



<b>Policy covers:</b>	Use of generative AI (AI)
<b>Relevant to:</b>	Applicants, reviewers, and grant holders
<b>What is this?</b>	This policy explains how AI can and cannot be used in NICHHS-funded research and processes. It aims to ensure AI is used safely, transparently, and responsibly.
<b>Key points:</b>	<ul style="list-style-type: none"> <li>• AI use must be ethical, legal, and transparent</li> <li>• You must declare any use of AI in applications and outputs</li> <li>• Researchers remain fully responsible for all work produced</li> <li>• Reviewers and committee members must not use AI to assess applications</li> <li>• Use of data for commercial AI purposes requires NICHHS agreement</li> </ul>
<b>Last updated:</b>	December 2025
<b>Review cycle:</b>	Currently being reviewed. NOTE: this means the document below is illustrative.
<b>Applies from:</b>	Updates apply to current and ongoing awards unless stated otherwise

## NICHHS Policy regarding Use of generative artificial intelligence (AI)

Generative AI (AI)	AI is a broad label used to describe any AI that can be used to create new content such as text, images, video, audio, or code.
Applicant	The researcher who is named as Principal Investigator on an NICHHS research grant application. For purposes of clarity, this guidance applies to any member of the research team who contributes to the production of the application.
Institution (Host Institution)	The university, research organisation, company, or other body to which the Grant is awarded / with whom the applicant is employed.
Committee Members	Members of our grant decision making committee (Scientific Research Committee, SRC).
Expert reviewers	Any reviewer that agrees to review an NICHHS research grant application.

### Context

AI is a fast emerging and evolving technology, and we recognise AI tools present opportunities and bring benefits to the research environment by:

- facilitating creativity and the development of ideas,
- supporting neurodivergence, and
- reducing language barriers.

However, the use of AI tools in the funding application and assessment process also presents potential risks around:

- rigour,
- transparency,
- originality,
- reliability,
- intellectual property,
- copyright,
- bias
- data protection - confidentiality of information entered is not guaranteed, and
- the legal protectability of Intellectual Property. (See NICHHS IP policy for grant holders)

It is our duty to uphold the highest standards in research while delivering the greatest value from public funds by funding the best research. We recognise the need to strike a balance between benefitting from AI while managing the associated risks. This includes protecting against potential ethical, legal and integrity issues in the use of these tools.

**General.** As a member of the Association of Medical Research Charities (AMRC), we uphold the [Research Funders Policy Group Joint Statement](#) on the use of generative AI tools in funding applications and assessment.

**Applicant responsibilities.** AI should be used ethically and legally, with any outputs assessed and acknowledged appropriately.

- Applicants and their host organisations are responsible and accountable for the content of their funding applications.
- Applicants must adhere to Institutional guidance around the use of AI tools, and follow the guidance outlined in this policy.
- Applicants using outputs from AI tools will be responsible (and liable) for the use of those outputs.
- Applicants must be aware of and mitigate the potential for bias in AI-generated output and consider the risks involved in using these tools. Applicants must ensure this does not contain any information that is:
  - confidential and used without consent,
  - falsified,
  - fabricated,
  - plagiarised, and/or
  - misrepresented.
- It is the applicant's responsibility to ensure that:
  - all confidential information is protected. Sensitive or personal data must never be input into an AI tool without formal consent;
  - personal data is protected, and all legal requirements around data management and protection are met; and
  - copyrighted material is protected and only used with the copyright holder's consent.
- Applicants must ensure that AI-generated material is clearly declared, and not submitted without critical oversight.
- This information will not affect the assessment process unless the use of AI has been deemed excessive. Applications should reflect the applicant's own voice and ideas, and using AI to write an entire grant application is not acceptable.
- In line with Section 14.4, T&Cs, the Applicant must ensure that all inventions are conceived by a natural person (human). If AI is used to create IP, a "Human-in-the-loop" audit trail (e.g., prompt logs) must be maintained to prove human inventive contribution and satisfy UK patent laws.
- Open Access Disclosure: any substantive use of AI in the production of research outputs must be disclosed in the 'Methods' or 'Acknowledgements' section of the publication, per Section 12.6, T&Cs.

## Researcher responsibilities

- Researchers using outputs from these tools will be responsible (and liable) for the use of those outputs.

- If NICHHS is informed of an allegation of research misconduct arising from the use of generative AI during application and assessment that is partially or wholly upheld, we reserve the right to:
  - reject any application under consideration on which the individual is a named applicant or researcher;
  - prevent the individual from submitting any further funding applications for any period of time, including indefinitely;
  - require the removal of the individual from the funded project;
  - terminate any funding, and reclaim funds awarded; and
  - prevent the individual from being an expert reviewer or NICHHS SRC Committee member for any period of time, including indefinitely.

### **Committee Member and expert reviewer responsibilities**

- Our expert reviewers and Committee Members are selected for their expertise and experience in their field. We seek their knowledge and judgement of an application in relation to the assessment criteria, and value their unique perspectives.
- Committee Members and reviewers:
  - must not use AI tools as part of their assessment activities, i.e. to conduct expert review
  - by extension, must not release confidential material into AI tools;
  - must comply with relevant intellectual property and data protection legislation; and
  - must not take into account or speculate within their assessment whether AI has been used to develop an application, or allow this to influence their judgement of the quality of an application.
- Reviewers must not upload confidential grant application material into AI tools. Doing so constitutes a breach of confidentiality and may jeopardise the future patentability of the applicant's research.
- If a Committee Member/reviewer informs NICHHS that they have used AI to develop their assessment, the following action may be taken:
  - for reviewers, the review they have provided will not be used, and
- for Committee Members, the comments they have provided may not be used to inform the funding decision.

### **Data as a Tangible Asset**

In alignment with Section 14.8 of the T&Cs, Research Data generated via NICHHS funding is a tangible asset. The use of this data to train, validate, or test commercial AI/Machine Learning models requires the express prior written consent of NICHHS and the execution of a Revenue Sharing Agreement. Refer to related policies and procedures (see IP statement).

### **Research Integrity and Misconduct**

- The use of AI-generated "hallucinations" (e.g., fake references or fabricated data) will be investigated as research misconduct.
- Failure to comply with AI disclosure requirements or confidentiality rules may result in the termination of funding, reclamation of awarded funds, or exclusion from future NICHHS funding opportunities, as outlined in Section 12.1 of the T&Cs.

### **Grants programme more generally.**

- NICHHS does not currently use AI tools in managing any aspect of our grants process.
- This policy is effective as of March 2026 and will be updated periodically to reflect changes in IP law and international research standards.

- Where this changes, we will declare this, and update this policy accordingly.
- This policy forms part of the NICHHS Research Governance Framework. It should be read in conjunction with the General Terms and Conditions of our research grants, as well as specific policies regarding Conflict of Interest, Intellectual Property, Open Access, and our established positions on EDI and PPI.