

	Policy on the Use of Generative AI and LLMs	Code: POL-ITS-3
		Version: 01
		Last version date: 1/12/2025

1. Introduction and Purpose

The rapid emergence of generative artificial intelligence (AI) technologies -particularly large language models (LLMs)- is transforming the way scientific institutions operate, both administratively and in research. This policy establishes IRB Barcelona's framework for the responsible, secure, and transparent use of AI tools across all domains of activity. It seeks to:

- Promote innovation while safeguarding data confidentiality and Intellectual Property (IP).
- Provide clear rules on the appropriate use of AI tools.
- Ensure scientific uses of AI align with the Research and Data Management IRB Barcelona policy.

2. Scope and Applicability

This policy applies to all members of and their activities at IRB Barcelona where AI tools, including LLMs, are used. Its scope includes both general (non-scientific) and scientific applications, with distinct responsibilities and conditions for each category.

Specifically, the Policy applies to:

- All IRB Barcelona members, including laboratory, research platform and administration members, including those external or affiliated members under a visiting/affiliation agreement. It also applies to external collaborators operating under IRB Barcelona frameworks.
- Any and all types of AI tools and services, including but not limited to:
 - Public and free web-based models (e.g., ChatGPT free)
 - Licensed platforms integrated in productivity suites (e.g., Gemini, ChatGPT Teams/Pro, Microsoft Copilot, DeepL Pro)
 - AI-assisted development tools (e.g., GitHub Copilot)
 - Internally deployed or custom-trained models

Two main areas of usage:

- Scientific usage: Covers research-related applications such as publication writing, data analysis, model development, and code generation. These uses must align with the legal, ethical, and strategic requirements of each research project, particularly regarding DMPs and IP protection.
- Non-scientific usage: Applies to any other tasks not included above. Emphasis is placed on data confidentiality and use only within secured, authorized environments.

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Use of AI in both domains must comply with IRB Barcelona's internal policies, legal obligations, and commitments to transparency, security, and data stewardship.

3. General Principles

All use of AI tools at IRB Barcelona -whether scientific or non-scientific- must adhere to the following foundational principles, which safeguard institutional integrity, data protection, and scientific credibility:

- **Confidentiality**
No sensitive, identifiable, or proprietary information may be entered into AI tools unless those tools are covered by agreements that explicitly guarantee data protection, non-retention, and confidentiality.
- **Ownership and Intellectual Property (IP)**
- The use of AI must not compromise IRB Barcelona's rights over its data, code, scientific results, or any outputs derived from research. Trained models or outputs must respect existing IP agreements with funders, partners, or other third parties.
- **Compliance with Data Management Plans (DMPs)**
- In research contexts, AI usage must follow the rules and restrictions defined in the applicable DMP, including data sharing, anonymization, and ethical approvals.
- **Human Oversight and Responsibility**
- All AI-generated outputs—whether text, data, code, or visual material—must be critically reviewed and validated by a human before being included in formal communications, publications, or decisions.
- **Transparency and Traceability**
- When applicable, the use of the AI tool must be disclosed transparently in scientific outputs, in accordance with the transparency, disclosure, and acknowledgment requirements established by publishers, journals, and funding bodies.
- **Security and Risk Awareness**
- AI tools must be used in a way that does not introduce information security vulnerabilities. Tools or platforms must be vetted for compliance with institutional security standards.
- **Proportionality and Purpose Limitation**
- AI should be used to assist, not replace, human judgment. Its use must be proportionate to the task and aligned with the mission of the Institute.
- **Environmental Responsibility**
For responsible AI use, its environmental consequences must be a key consideration, rooted in the principle of proportionality to minimize its energy footprint. This means ensuring that the energy consumed by AI systems is commensurate with the benefits they provide, avoiding excessive resource use

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for marginal gains.

These principles apply regardless of the type of AI tool used or whether it is deployed internally, licensed, or accessed via third-party platforms.

4. Non-Scientific Use of AI Tools

This section establishes guidelines for the use of AI tools by IRB Barcelona members in non-research contexts. The goal is to encourage responsible and secure use of AI technologies while protecting IRB Barcelona's data, confidentiality, and professional standards.

4.1 Permitted Uses

AI tools may be used to support general tasks, even when involving sensitive or protected content, such as (but not limited) to:

- Drafting internal communications or procedural documents
- Translating public-facing institutional materials
- Formatting or refining texts (e.g., minutes, agendas)
- Summarizing documentation for internal use

These uses are permitted only when the AI tool is accessed through a platform that meets both of the following conditions:

- Provides explicit guarantees regarding confidentiality, non-retention, and non-use of inputs for model training, and
- Covered by a formal contract or data protection agreement with IRB Barcelona.

Examples of acceptable environments include:

- Google Gemini when used within IRB Barcelona's institutional agreement with confidentiality warranties
- ChatGPT Teams/Pro under IRB Barcelona's contracted license

These environments ensure that sensitive content is not stored, reused, or exposed to external processing pipelines, and remain under full IRB Barcelona data governance.

4.2 User Responsibility

- All users are expected to apply critical judgment and perform manual review of AI-generated outputs before dissemination or further use.
- No AI tool should be used to create, summarize, or share confidential information unless explicitly approved under IRB's secure framework.
- For questions about platform compliance, users should consult IRB Barcelona Barcelona's Legal Office, Innovation Department or IT Department before

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proceeding.

5. Scientific Use of AI Tools

This section addresses the use of AI tools, particularly LLMs, in the context of scientific research conducted at IRB Barcelona. It aims to support responsible innovation in research while safeguarding data confidentiality, IP and compliance with each project's data management obligations.

5.1 Permitted Uses

Researchers may use AI tools to support scientific tasks such as:

- Drafting or editing parts of manuscripts, grant proposals, or reports
- Summarizing literature or identifying relevant publications
- Assisting in code generation or computational workflows
- Exploratory data analysis or hypothesis generation (non-decisional)

The use of scientific content or research data in AI tools is subject to specific precautions:

- Researchers must verify that the use of any scientific data or algorithms in an AI tool does not breach confidentiality, compromise IP, or violate the conditions of:
 - Project-specific agreements or consortium rules
 - The corresponding DMP
 - Ethical approvals or material/data transfer agreements, especially important in the case of using personal data (i.e. genomic cohorts from repositories or biobanks).

AI can be used in these contexts provided that:

- The tool is accessed in a controlled environment under an IRB Barcelona-approved agreement (see section 4)
- All outputs are verified by the researcher before being submitted, published, or shared
- When applicable, the use of the AI tool must be disclosed transparently in scientific outputs.
- Use of LLMs to process, summarize, or draft materials based on non-public data is only allowed in platforms that:
 - Are governed by IRB Barcelona contractual agreements with warranties of confidentiality and data isolation
 - Do not retain or reuse inputs for model improvement

5.2 Prohibited Uses

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The following practices are explicitly prohibited:

- Using public or free AI tools (e.g., ChatGPT Free, Gemini unauthenticated) to process unpublished data, draft manuscripts, internal reports, or confidential protocols
- Copy-pasting grant applications, experimental designs, or code with protected dependencies into AI tools without guaranteed contractual protection
- Over-relying on AI-generated content in scientific reasoning, without critical human validation
- Any other action or activity that compromises the ownership and confidentiality of IRB data.

5.3 Use of AI in Publication and Disclosure

When AI tools have contributed to a scientific work:

- Researchers must explicitly acknowledge the use of AI in the methods or acknowledgements section, where appropriate
- All final responsibility for scientific claims, text, and data rests solely with the researchers

5.4 Researcher's Responsibilities

- Researchers are responsible for understanding the contractual status of any AI tool used
- They must ensure that any content processed by AI is compliant with institutional, ethical, and project-specific data use rules
- In case of doubt, researchers must consult with the Legal Department, Competitive Funding Strategy and Scientific Management Department, Innovation Department or Information Technologies Services Department

6. Security and Confidentiality Controls

Ensuring the security and confidentiality of data is a critical requirement for the use of AI tools at IRB Barcelona. All members must adopt practices that protect institutional information, comply with data protection regulations, and prevent unauthorized exposure of sensitive content.

6.1 Secure Handling of Scientific and Operational Data

- All data used for training or inference in AI tools must be:
 - Stored in secure, institutionally managed environments (IRB Object storage/MINio, IRB google Drive)

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- Transmitted using encrypted protocols where applicable
 - Anonymized or pseudonymized if required by the DMP or ethical approvals
- Backup, storage, and logging systems used in AI workflows must comply with IRB Barcelona’s IT security standards.

6.2 Prohibited Practices

The following actions are explicitly prohibited:

- Using AI tools without knowing or verifying the provider’s data retention and reuse policies
- Uploading IRB Barcelona data into free, consumer-facing LLMs (e.g., ChatGPT Free, Gemini unauthenticated)
- Sharing API keys or credentials for IRB Barcelona accounts across external systems
- Allowing third-party tools to store or log IRB Barcelona content without formal authorization

7. Coordination and Compliance

All members are responsible for ensuring that AI usage is aligned with this policy and does not compromise IRB Barcelona’s data protection obligations under the GDPR, Spanish data protection law, or institutional policies.

In case of uncertainty about the legal or technical compliance of an AI tool or use case, users must consult with the Legal Department, Competitive Funding Strategy and Scientific Management Department, Innovation Department or InformationTechnologies Services Department

Any incident involving potential data leakage or improper use of AI must be reported immediately through the appropriate internal channels.

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Summary of Changes

Version	Date	Description of the modification
01	1/12/2025	Creation of the document