

International Journal of Learning, Teaching and Educational Research
 Vol. 25, No. 9, pp. 572-591, September 2026
<https://doi.org/10.26803/ijlter.25.9.23>
 Received May 22, 2026; Revised Aug 12, 2026; Accepted Aug 14, 2026

Governing AI in Higher Education Research: A Spolskyan Language Policy Analysis of Vietnam's Scientific Integrity Regulation (Decision 2557/QĐ-BKHCN)

Thai Thi Thanh Tuyen , **Vu Thi Phuong Thanh*** 
 Faculty of Foreign Languages, Nguyen Tat Thanh University
 Ho Chi Minh City, Vietnam
 University of Foreign Languages and International Studies,
 Hue University, Hue City, Vietnam

Luu Nguyen Tram Nhung 
 Faculty of Foreign Languages, University of
 Finance – Marketing, Ho Chi Minh City, Vietnam

Citation :
 Tuyen, T, T, T., Thanh, V, T, P., & Nhung, L, N, T. (2026). Governing AI in Higher Education Research: A Spolskyan Language Policy Analysis of Vietnam's Scientific Integrity Regulation (Decision 2557/QĐ-BKHCN). *International Journal of Learning, Teaching and Educational Research*, 25(9), 572-591. <https://doi.org/10.26803/ijlter.25.9.23>

Abstract. The widespread adoption of generative artificial intelligence (GenAI) in higher education research and academic writing has led governments to develop regulatory frameworks governing its use. Despite growing attention to AI governance, no prior study has analyzed a national AI-integrity instrument in Southeast Asia through a language-policy lens. Addressing this gap, this qualitative, document-based study examines Article 16 of Vietnam's Decision No. 2557/QĐ-BKHCN, which outlines principles of scientific integrity and research ethics, through Spolsky's (2004, 2009) language policy framework. By conceptualizing AI-generated academic text, the study interprets the Decision as a form of top-down language management governing AI use. Using Critical Policy Analysis (CPA) and Critical Discourse Analysis (CDA), the study analyzes the six provisions of Article 16 in relation to Spolsky's three dimensions: language practices, language beliefs and ideologies, and language management. The findings indicate that the policy promotes an ideology of academic integrity in which AI is framed as a tool, thereby maintaining human responsibility for scholarly outputs. As empirical data on researchers' practices are not yet available, the study does not assess compliance. Instead, it identifies a potential gap between policy requirements and the rapidly changing use of AI by researchers in Vietnamese higher education. By comparing Vietnam's approach with international AI-governance frameworks, the study extends Spolsky's framework to AI governance and provides practical recommendations

*Corresponding author: Vu Thi Phuong Thanh; thanhvottp@ntt.edu.vn

for aligning legal compliance with responsible AI use, academic writing instruction, and digital literacy.

Keywords: language policy; AI governance; academic integrity; higher education; Vietnam

1. Introduction

The emergence of GenAI (AI) has transformed the landscape of scientific research, creating new challenges for research governance worldwide. Large language models (LLMs) are increasingly capable of drafting manuscripts, generating literature reviews, producing visualizations, and creating references that appear credible despite being inaccurate or entirely fabricated. In this context, the question of who or what is permitted to be recognized as an author of scientific knowledge has become not merely an ethical debate but a matter of state-level policy intervention.

In Vietnam, a recent policy response was introduced through Decision No. 2557/QĐ-BKHCN, issued by the Ministry of Science and Technology on 25 May 2026. Entitled *Guidelines on Scientific Integrity and Professional Ethics in Scientific Research and Technological Development* (Ministry of Science and Technology of Vietnam, 2026), the document includes Article 16, which specifically addresses the use of AI in scientific research. The provision outlines principles concerning AI-generated data and references, disclosure requirements, confidentiality obligations, and the responsibility of researchers for all outputs produced with AI assistance. As one of the first research-integrity instruments in Southeast Asia to address AI use in scientific research specifically, Article 16 provides a valuable case for examining how states respond to the challenges posed by AI-mediated knowledge production.

This paper argues that Article 16 can be productively analyzed not only as a science policy instrument but as an act of language management in the Spolsky's sense. When the state regulates what AI may or may not produce in the context of scientific writing, it is, in effect, governing academic discourse. In other words, it determines whose voice counts, what forms of textual production are legitimate, and under what conditions AI-generated language may enter the scholarly record. To explore this argument, the study adopts Spolsky's (2004, 2009) tripartite framework of language policy, which consists of language practices, language beliefs (ideology), and language management. While this framework has traditionally been applied to issues of multilingualism and language education, this study extends its application to the emerging context of AI-assisted scientific communication.

Although AI governance has attracted increasing scholarly attention, research remains limited regarding its discursive and language-policy dimensions. Existing studies have primarily examined AI governance from ethical (Hagendorff, 2024), regulatory (Hacker et al., 2023), and bibliometric perspectives (Goktas, 2024). However, little attention has been paid to how AI governance policies regulate language use and knowledge production. Furthermore, a search

of the language-policy and AI-governance literature returned no published study employing a language-policy framework to analyze AI governance in scientific research within the Southeast Asian context. This study seeks to address this gap by examining Article 16 through the lens of Spolsky's tripartite model and by addressing three research questions corresponding to its three analytical components:

RQ1: How does Article 16 of Decision 2557/QĐ-BKHCN govern AI-generated discourse in Vietnamese academic research as a form of language management?

RQ2: What language ideologies concerning AI, authorship, and scientific integrity are embedded in Article 16?

RQ3: What tensions between language management and language practice does the design of Article 16 render foreseeable, on what structural grounds, and how does the framework compare with international approaches to AI governance?

2. Literature Review

2.1 Spolsky's Language Policy Framework

Spolsky (2004) conceptualized language policy as consisting of three interrelated components: language practices, language beliefs (or ideology), and language management. Language practices refer to the observable patterns of language use within a speech community. Language beliefs (or ideology) denote the shared values, attitudes, and assumptions a community holds about language and its appropriate use. Language management involves any deliberate efforts by individuals, institutions, or authorities to modify language practices, typically through planning, regulation, or intervention (Spolsky, 2004, 2009).

A central feature of Spolsky's framework is its recognition that these three components exist in a dialectical relationship. Language management does not necessarily produce immediate changes in language practices, particularly when policy interventions conflict with established beliefs and norms. On the other hand, shifts in language practices may gradually reshape language beliefs even without formal policy intervention. Spolsky (2009) further developed the concept of *language managers*, noting that while anyone can influence the language choices of others, language management is usually associated with people or documents that have institutional or legal authority. This aspect of the framework makes it particularly useful for examining state-led policy interventions such as Decision No. 2557/QĐ-BKHCN.

While Spolsky's model has been applied extensively to multilingual education, family language policy, and national language planning, its application to non-traditional domains remains limited. This study extends the framework to the context of AI-assisted scientific writing, arguing that its tripartite structure provides a useful lens for understanding how states regulate the production and circulation of AI-generated academic discourse.

Two clarifications guard against over-extension. First, Spolsky's model was developed to analyse choices between linguistic varieties, while Article 16 regulates the source and disclosure of text. We therefore adapt the framework to treat generative AI output as a language practice that can be managed through policy. Second, we draw on later developments, including Spolsky's (2019) work on self-management and non-linguistic forces, Shohamy's (2006) covert policy mechanisms, Johnson's (2013) critical policy discourse analysis, and Ricento and Hornberger's (1996) layered model. Together, these perspectives help explain the Law → Decree → Decision → institutional-code structure.

2.2 Academic Discourse as a Language Domain

The concept of *domain* originates with Fishman (1972) and was subsequently transmitted into language-policy scholarship by Spolsky (2004); it refers to recognizable social contexts, such as home, school, or workplace, within which distinct language norms operate. Academic research can be understood as a particular domain, characterized by specialized genres, citation conventions, authorship norms, and evaluative criteria that collectively determine what counts as legitimate scholarly communication (Hyland, 2015).

Hyland (2015) emphasized that academic writing is not merely a means for conveying research findings but a social practice through which disciplinary communities construct knowledge, negotiate authority, and establish credibility. Extending this argument, Canagarajah (2002) noted that dominant norms in international academic publishing are largely shaped by Anglophone traditions, creating unequal conditions for scholars whose linguistic and educational backgrounds differ from these expectations. From this perspective, access to the discursive norms of academic English becomes a form of scholarly capital.

Recent development of AI writing tools has introduced new considerations for these dynamics. When a large language model produces text that mimics the conventions of academic prose, it challenges foundational assumptions about authorship, originality, and intellectual contribution. As a result, questions have emerged regarding the role of AI-generated language in scholarly communication, particularly in relation to authorship, originality, and accountability. From a language policy perspective, these developments raise the issue of whether, and under what conditions, AI-generated text may be incorporated into legitimate academic practice. Article 16 of Decision No. 2557/QĐ-BKHCN understood as an attempt to address these questions through formal policy intervention.

2.3 AI-Generated Text and Authorship

The debate over AI authorship in scientific publishing has intensified since the release of ChatGPT in late 2022. Concerns have been raised following evidence that LLMs can produce references that appear credible but do not correspond to actual sources (Gravel et al., 2023). At the same time, the growing use of AI tools in manuscript preparation has prompted academic publishers and professional organizations to clarify their positions on the role of AI in scholarly communication (Ganjavi et al., 2024). A simpler, more succinct version is: In February 2023, the Committee on Publication Ethics (COPE) stated that AI tools

cannot be recognised as authors because they cannot take responsibility for submitted work, manage conflicts of interest, or enter into copyright agreements (COPE, 2023). Similarly, Springer Nature, Elsevier, and other major publishers adopted policies requiring transparent disclosure of AI use while prohibiting AI from being listed as an author (Ganjavi et al., 2024).

These policy responses reflect a broader ideological position in which authorship is understood as inseparable from accountability. The criteria of the International Committee of Medical Journal Editors (ICMJE, 2024) require that authors make substantial intellectual contributions, draft or critically revise the manuscript, approve the final version, and accept responsibility for the work. AI, as a non-legal entity, cannot fulfill the accountability criterion. As the analysis in this study demonstrates, a similar understanding of authorship and accountability is reflected in Article 16 of Decision No. 2557/QĐ-BKHCN.

2.4 Language Policy in Emerging Economies

A growing body of scholarship documents how researchers and graduate students in emerging, non-Anglophone economies rely on AI-based writing and translation tools as a coping strategy for the linguistic demands of English-medium publishing (Baldauf & Jernudd, 1983; Canagarajah, 2002; Kirkpatrick, 2010). For these scholars, generative AI functions less as a shortcut than as a means of participation in a scholarly system that privileges native-like academic English. From this perspective, AI adoption is a response to longstanding linguistic inequality rather than simply a threat to research integrity. However, disclosure requirements may disadvantage non-Anglophone authors who rely on AI tools for language support. Section 5.3 returns to this tension in the Vietnamese context.

Language planning research has traditionally focused on macro-level interventions undertaken by states and other institutional actors, although more recent scholarships have emphasized the importance of examining language planning activities at the local level (Baldauf, 2006). In many Southeast Asian countries, language-related norms continue to be shaped primarily through state policies and regulatory frameworks. Discussing language-in-education policy across ASEAN member states, Kirkpatrick (2010) observed that such policies are often influenced by concerns relating to national identity, economic development, and participation in global English-speaking networks.

The Vietnamese context reflects the continuing importance of state-led policy intervention. The Law on Science, Technology and Innovation (Law No. 93/2025/QH15) introduced scientific integrity and professional ethics as matters subject to formal legal regulation (National Assembly of the Socialist Republic of Vietnam, 2025). These provisions were subsequently elaborated through Decree No. 262/2025/NĐ-CP, which assigned responsibility to the Ministry of Science and Technology for developing implementation guidelines (Government of the Socialist Republic of Vietnam, 2025). Decision No. 2557/QĐ-BKHCN was issued within this broader regulatory framework.

Among the provisions contained in the Decision, Article 16 is of relevance to the present study because it specifically addresses the use of AI in scientific research. The article establishes rules governing the use of AI-generated content, researcher responsibility, and disclosure requirements. As such, it provides a useful site for examining how the state seeks to regulate emerging forms of AI-mediated academic communication. From a language policy perspective, Article 16 represents an instance of formal language management in which state authorities intervene to define the conditions under which AI-generated language may be incorporated into scientific discourse.

3. Theoretical Framework

Spolsky's framework distinguishes three interrelated components – language practices, language beliefs (ideology), and language management. Table 1 summarizes the analytical mapping of these three components onto the Vietnamese AI-governance context.

The dialectical relationship among the three components is central to the analysis. The study examines not only the internal structure of Article 16 (management) and its ideological foundations (beliefs) but also the anticipated tension between regulatory intent and the evolving realities of AI use in Vietnamese research institutions (practices).

Table 1: Mapping Spolsky's framework to AI governance in Vietnamese academic discourse

Spolsky's Component	Application to Article 16	Illustrative text in Article 16 (Vietnamese / English gloss)
Language Practices	Actual researcher use of AI tools in writing, data analysis, translation	Inferred from practice; not named in the text (e.g., AI used for drafting, analysis, and translation)
Language Beliefs/Ideology	Normative assumptions about authorship, integrity, and AI's discursive status encoded in the policy	"chỉ được coi là công cụ hỗ trợ" – "only considered a support tool" (Provision 5)
Language Management	Regulatory provisions: prohibitions, disclosure mandates, accountability structures	"Không sử dụng..." – "Shall not use..." (Provisions 1-2); "cung cấp đầy đủ..." – "fully disclose..." (Provision 3)

This study applies Spolsky's (2004, 2009) tripartite language policy framework to analyze Article 16 of Decision 2557 as an act of governing AI-generated academic discourse. The framework is operationalized as follows:

Language Practices correspond to the actual, on-the-ground patterns of AI use in academic writing among Vietnamese researchers. These practices include using AI tools to draft manuscripts, generate literature reviews, translate between Vietnamese and English, polish academic prose, and produce data analyses.

Before the issuance of Decision 2557, these practices were largely unregulated and unevenly documented.

Language Beliefs/Ideology refer to the normative assumptions about scientific authorship, integrity, and the status of AI-generated text that are encoded within the policy itself and circulate within the Vietnamese academic community. The key ideological question is whether AI is understood as an autonomous discursive agent capable of producing knowledge or as a subordinate instrument under human control. As this analysis demonstrates, Article 16 unequivocally adopts the latter position.

Language Management encompasses the specific regulatory provisions of Article 16: the prohibitions, obligations, and accountability structures that the state deploys to shape and constrain AI-related academic practices. This includes directive language (“*shall not*,” “*shall provide*,” “*is only considered as*”) that explicitly intervenes in the discursive choices available to researchers.

4. Methodology

4.1 Research Design

This study employs a qualitative research design that combines CPA with CDA. CPA examines how policies construct social problems, assign responsibility, and embed ideological assumptions through their linguistic and structural choices. CDA, as developed by Fairclough (1995), focuses on how language in official texts reflects and reinforces power relations. Together, the two frameworks allow for a close reading of policy texts at both the regulatory and ideological levels. As a purely text-based, qualitative CPA, the study interprets the policy’s design rather than measuring its uptake.

The choice of these analytical tools follows from the theoretical commitments of Spolsky’s (2004) framework. Because language management cannot be understood in isolation from language ideology, an analysis of Decision 2557 must examine not only what the policy mandates but also the assumptions embedded in how those mandates are expressed. CPA provides the structural lens for reading how the policy constructs problems and allocates responsibility, while CDA supplies the linguistic tools to surface the ideological assumptions that underlie the text’s formal regulatory content.

To situate the analysis in its policy context, we draw on the Decision’s own promulgating text. Decision 2557 states that it was issued to guide “*scientific integrity and professional ethics in scientific research and technological development*,” pursuant to the Law on Science, Technology and Innovation (2025) and Decree 262/2025 (Ministry of Science and Technology of Vietnam, 2026; see Appendix). This official framing — locating AI use within a binding national integrity regime rather than a voluntary code — provides the documentary context against which the following analysis reads Article 16.

4.2 Data Sources

The primary data source is the full text of Decision No. 2557/QĐ-BKHCN (Ministry of Science and Technology of Vietnam, 2026), with particular focus on Article 16 (*“Scientific integrity and professional ethics when using artificial intelligence”*) and its six provisions. Contextual analysis draws on the broader Decision text, including the definitional provisions (Article 2), the violation categories (Article 3), and the prevention, responsibility, and violation-handling provisions (Chapter III and Section III.6 of the Guidance).

Supplementary data sources include international AI-governance documents used for comparative analysis: the COPE Position Statement on Authorship and AI Tools (2023); the UNESCO Recommendation on the Ethics of Artificial Intelligence (2022); the ALLEA European Code of Conduct for Research Integrity (2023 revision). These documents were selected because they represent the most widely cited international frameworks governing the intersection of AI, authorship, and research ethics.

The primary text was obtained from the official Ministry of Science and Technology portal and cross-checked with the version on thuvienphapluat.vn for accuracy. The international frameworks are open-access documents available through their official websites. The Singapore Statement on Research Integrity (2010) was excluded because it predates LLMs and does not address AI. The authors translated Article 16 into English, with the translation verified by a second Vietnamese English bilingual researcher. The translation followed Vietnamese legal conventions, with the English version used only to clarify the original Vietnamese text.

4.3 Analytical Procedure

The analysis proceeded in three stages. First, the six provisions of Article 16 were coded according to the three components of Spolsky’s framework, identifying which provisions constitute acts of management, which encode ideological positions, and which implicitly reference existing practices. Second, the lexicogrammatical features of the normative language in Article 16 were examined in the Vietnamese source text – attending to the bare-verb imperative (e.g., *“không sử dụng”*), the *“không / không được”* contrast, the deontic scale of Vietnamese legal drafting (*“phải, không được, được, cần”*), and classificatory terms – rather than to English modal auxiliaries, with the authors’ English rendering serving only as a gloss. Third, the provisions of Article 16 were compared with the international frameworks listed above to identify convergences, divergences, and distinctive features of the Vietnamese approach.

Table 2 operationalizes this procedure, linking each micro-linguistic feature to the analytical question it addresses across the textual, discursive-practice, and social-practice dimensions of Fairclough’s (1995) model.

Table 2: Operationalising Fairclough's (1995) three dimensions against Article 16

Analytical dimension	Textual/discursive feature examined in Article 16	Guiding question and macro-level inference
Text (micro-linguistic)	Bare-verb prohibitions ("không sử dụng"); disclosure verbs ("cung cấp"); the deontic marker "được" (Provision 5); the classificatory phrase "chỉ được coi là công cụ hỗ trợ".	Which provisions prohibit, mandate, or classify, and with what normative force? Infers the strength and type of each act of management.
Discursive practice	Genre of ministerial guidance; delegation of enforcement to institutional codes; disclosure framed as researcher self-report.	How is the text produced, circulated, and enacted, and by whom is it interpreted? Infers where discretion and enforcement reside.
Social practice	AI positioned as tool not agent; exclusively human accountability; the "Party and State" framing (Provision 6); the disclosure burden on non-Anglophone authors.	What ideologies of authorship, integrity, and language does the policy naturalize, and whose interests does it serve? Infers the policy's language ideology.

4.4 Positionality

The researchers are lecturers and applied linguists based in Vietnam with direct experience of the institutional contexts in which Decision 2557 will be implemented. This insider perspective affords familiarity with the practical realities of AI use in Vietnamese academic settings, though it also necessitates reflexive attention to potential bias in interpretation.

This positionality carries specific interpretive commitments. As Vietnamese applied linguists whose publications are governed by Decision 2557, we are directly affected by the disclosure requirements. Our insider perspective drew our attention to Provision 5 and the greater burden these requirements may place on non-Anglophone authors. We also read the reference to "*Party and State*" in Provision 6 as politically meaningful rather than incidental. We treat these commitments as a resource for interpretation while remaining alert to the risk of over-identifying with the policy's own framing.

5. Findings and Discussion

The findings are organized to address the three research questions in turn. Section 5.1 addresses RQ1 by examining Article 16 as language management. Section 5.2 addresses RQ2 by examining the language ideology reflected in the policy. Sections 5.3 and 5.4 address RQ3 by examining potential tensions between policy and practice and comparing Vietnam's approach with international frameworks.

5.1 Language Management in Action: The Regulatory Architecture of Article 16 (RQ1)

Article 16 consists of six numbered provisions, each addressing a distinct aspect of AI-related research conduct. Within the structure of the Decision, the article is situated in the model code of conduct included as an appendix to the Guidance, a template that funding agencies and research institutions are expected to adopt and adapt as internal policy. The Guidance itself is characterized as a framework document, meaning that implementation is left to individual organizations rather than mandated uniformly. An examination of the language and structure of the six provisions shows that they are organized around three regulatory functions: prohibition, obligation, and classification of conduct.

Provisions 1 and 2 establish prohibitions targeting the most serious forms of AI misuse. Provision 1 states: *“Shall not use artificial intelligence to create fake data, fake images, or fictitious references”* (Ministry of Science and Technology of Vietnam, 2026, Art. 16.1). Provision 2 extends this to: *“Shall not use unverified materials generated by artificial intelligence as references.”* In the Vietnamese source, Provisions 1 and 2 are framed not with a modal auxiliary but with a bare negated verb, *“không sử dụng”* (lit. ‘not use’). Vietnamese legal-normative style conveys imperative force through the bare verb and genre convention rather than through modals, so the English *“shall not use”* is a gloss chosen to render this deontic force.

Read in the original, the bare-verb prohibition functions as an absolute proscription, leaving no room for contextual interpretation or discretion. Notably, the deontic marker *“được”* (to be permitted) appears in Provision 5 and nowhere else in Article 16, evidence that Provision 5 performs classificatory rather than prohibitive work. These provisions directly target the practices that have provoked international concern, in particular the phenomenon of AI hallucinations producing plausible but nonexistent citations (Gravel et al., 2023).

Provision 3 shifts from prohibition to obligation, requiring researchers to *“provide complete information about the name of the tool, version, and scope of artificial intelligence use during the scientific research process; shall clearly indicate research content that is entirely generated by artificial intelligence.”* This disclosure mandate is the most operationally detailed provision in Article 16. It specifies three elements of disclosure: tool identification, version specificity, and scope delineation. The language *“provide complete information”* imposes an affirmative duty rather than a negative restraint.

Provision 4 addresses data governance: *“Shall not upload confidential or unpublished data to artificial intelligence platforms in violation of legal regulations.”* This provision connects AI use to the broader framework of data protection law, recognizing that the act of inputting research data into commercial AI systems constitutes a form of disclosure that may breach confidentiality obligations.

Provision 5 is arguably the most ideologically significant. It states: *“Artificial intelligence is only considered as a support tool, and the user must bear final responsibility for all content, products, and materials generated by artificial intelligence.”* The classificatory phrase *“chỉ được coi là công cụ hỗ trợ”* (only considered as a support

tool) performs a crucial discursive function: it forecloses the possibility of AI being recognized as an author, co-creator, or independent intellectual contributor. By defining AI exclusively as an instrument, the provision preserves the integrity of human authorship as the foundational norm of the scientific domain.

Provision 6 is a catch-all clause allowing funding agencies and research organizations to supplement the article with additional provisions consistent with Party and State regulations, thereby embedding Article 16 within the broader Vietnamese governance architecture.

Overall, Article 16 regulates AI use in research through a combination of explicit prohibitions and procedural obligations. The provisions begin with the most serious threats to research integrity, namely the fabrication and falsification of research outputs using AI. They then address disclosure requirements, data confidentiality, and the principle that AI should serve only as a support tool. This ordering suggests that the policy is primarily concerned with preventing misconduct rather than enabling AI use in research. However, Article 16 does not specify sanctions for individual violations. Enforcement details are left to institutional discretion, which allows for flexibility but may result in uneven application across organizations.

5.2 Ideology Embedded in Policy: AI as Tool, Not Agent (RQ2)

Article 16 takes a clear stance on the role of AI in scientific writing. It treats AI as an instrumental tool rather than as a discursive agent capable of producing knowledge claims. This is not an incidental policy choice but a deliberate act of classification, one that shapes how AI-generated text is understood, evaluated, and legitimized within the Vietnamese scientific community.

By designating AI as “*only*” a “*support tool*” (Provision 5), the policy draws a clear ontological boundary between human researchers and AI systems. Human researchers are positioned as discursive agents who propose, create, evaluate, and bear responsibility for their work. AI, by contrast, is denied such agency. It produces outputs but does not “*author*” them. This binary maps directly onto the accountability framework that underpins the Decision. Under Article 21, individual researchers bear responsibility for maintaining integrity throughout the research process, including the duty to declare their use of AI tools. This responsibility, the policy makes explicit, cannot be delegated to a non-human entity.

This stance resonates with the positions adopted by international bodies, though it is not identical to them. COPE’s (2023) position statement similarly excludes AI from authorship on the grounds that AI cannot take responsibility, manage conflicts of interest, or consent to publication terms. However, the COPE position is articulated as a recommendation from a voluntary professional organization. Article 16, by contrast, is part of a ministerial template issued under a statutory mandate (Government of the Socialist Republic of Vietnam, 2025, Art. 7). Funding agencies and research organizations are directed to adopt and operationalize this template as binding internal rules. The Vietnamese approach thus translates an

emerging international norm into a state-sponsored regulatory instrument. It is stronger than a voluntary guideline in its institutional anchoring, though it acquires binding force only through institutional adoption.

The ideological implications extend to the concept of scientific integrity itself. Decision 2557 defines scientific integrity as requiring “*uprightness, honesty, responsibility, fairness, and transparency*” (Art. 2.1). These are inherently human virtues. By anchoring integrity in moral attributes that only persons can possess, the policy implicitly excludes AI from the domain of those capable of bearing integrity. AI cannot be “*upright*” or “*honest*”. It can only be used honestly or dishonestly by human agents. This anthropocentric framing reinforces the tool-agent distinction encoded in Provision 5.

What Article 16 does not say is equally revealing, as silences in policy texts deserve analytical attention. The provision does not acknowledge any positive epistemic contribution that AI might make to the research process. It says nothing about AI’s capacity to identify patterns in large datasets that human cognition might miss, or its potential to help researchers from non-Anglophone backgrounds produce publication-ready English. In ideological terms, the policy constructs AI as a site of risk and obligation, not of empowerment. This risk-oriented framing contrasts with the more balanced discourse found in some international documents. UNESCO’s Recommendation (2022), for instance, acknowledges both the potential benefits and the risks of AI, calling for governance that encourages beneficial uses while guarding against harmful ones. Article 16, by contrast, is weighted more heavily toward prevention.

This ideological orientation may also reflect the broader political context in which Vietnamese science governance operates. The Decision explicitly references the “*regulations of the Party and the State*” (quy định của Đảng, Nhà nước) as the boundary within which institutional codes must be developed (Art. 16.6). This dual reference to both the Communist Party of Vietnam and the state apparatus situates AI governance within a political framework in which the state’s role as guardian of public knowledge norms is taken for granted. In more decentralized governance systems, this role might instead be contested or negotiated.

5.3 The Gap Between Management and Practice (RQ3)

The most significant analytical challenge posed by Spolsky’s framework lies in the relationship between management (what policy prescribes) and practices (what researchers actually do). Empirical data on Vietnamese researchers’ AI practices following Decision 2557 are not yet available, given the recency of the policy. However, several structural features of the implementation environment suggest that a substantial gap between the two is likely to emerge.

First, the disclosure obligation in Provision 3, while detailed in its requirements, depends entirely on researcher self-reporting. Unlike plagiarism, which can be partially detected through text-matching software, the use of AI to draft portions of a manuscript, refine arguments, or generate initial data analyses is often invisible in the final output. This creates what might be termed a *verifiability deficit*.

The policy mandates disclosure, but the mechanisms for detecting non-disclosure remain underdeveloped, and automated AI-detection tools are themselves unreliable and prone to high false-positive rates (Weber-Wulff et al., 2023).

Second, the rapid evolution of AI capabilities outpaces the policy's specificity. Article 16 does not distinguish between different categories of AI use, such as using AI for grammar correction versus using it to generate entire sections of a paper. This lack of granularity may create interpretive ambiguities. A researcher who uses an AI tool to translate a Vietnamese-language draft into English may view this as a routine language task not requiring disclosure, while a strict reading of Provision 3 would appear to require it.

Third, institutional capacity for implementation varies considerably across Vietnam's research sector. The Decision acknowledges this variation by functioning as a *"framework document"* (tài liệu khung) that allows individual organizations to develop their own internal codes. However, this delegated approach risks producing uneven implementation. Well-resourced national universities may establish robust AI-governance protocols, while smaller institutions may lack the expertise or infrastructure to do so.

Fourth, the linguistic dimension of the management-practice gap deserves attention. Vietnamese researchers who publish internationally typically write in English, often with varying degrees of proficiency. For these researchers, AI-based language polishing and translation tools are not luxuries but necessities for participation in global academic discourse (Canagarajah, 2002). Article 16's requirement to disclose all AI use creates a dilemma. Transparent disclosure of AI-assisted language editing could signal to international reviewers that the author's English proficiency is limited, potentially disadvantageous to the very researchers whom AI language tools were meant to assist. This unintended consequence illustrates the complexity of regulating AI in a multilingual academic context and connects the policy to longstanding concerns about linguistic inequality and epistemic injustice in global publishing (Baldauf & Jernudd, 1983; Canagarajah, 2002). AI mediation between languages may be indistinguishable from the kind of editorial assistance that has long been accepted in academic publishing.

These anticipated gaps echo a pattern well documented in language policy research. Formal management interventions frequently meet resistance or modification when they confront existing practices and beliefs that have their own momentum (Spolsky, 2009). The challenge for Vietnamese science governance will be to develop not only the institutional infrastructure but also the interpretive guidance needed to convert regulatory text into a workable research culture. Such a culture must distinguish between AI use that threatens integrity and AI use that democratizes access to global academic participation.

5.4 Vietnam in Global Context

Situating Article 16 within the international context of AI governance for research reveals both points of convergence and distinctive features of the Vietnamese approach.

The convergences are substantial. Article 16's prohibition on AI-generated fabricated data aligns with the ALLEA European Code of Conduct for Research Integrity (2023), which identifies fabrication and falsification as primary research misconduct regardless of the means employed. Its disclosure requirement mirrors the COPE (2023) position that authors must be transparent about how AI tools were used. Its emphasis on human accountability echoes the UNESCO Recommendation on the Ethics of Artificial Intelligence (2022), which asserts that humans must remain responsible for decisions and actions influenced by AI systems. At the level of principle, Vietnam's policy participates in an emerging global consensus.

The divergences are equally instructive. Unlike the COPE position, which operates as a voluntary guideline for the publishing industry, Article 16 is issued by a ministry under statutory authority as part of a national guidance framework. This gives it an institutional anchoring that publisher guidelines lack. The contrast reflects the distinctive role of the state in Vietnamese knowledge governance, where research institutions are predominantly public and operate under government oversight.

Beyond this, Article 16 is embedded within a broader integrity framework that includes procedures for reporting and handling violations, as well as a national digital platform for recording integrity breaches (Section III.7 of the Guidance; Government of the Socialist Republic of Vietnam, 2025, Art. 8). This institutional architecture gives Vietnam's AI governance provisions a potential enforcement infrastructure that many international guidelines lack. The COPE position, for example, relies on individual journals and publishers to implement its recommendations, with no centralized monitoring or sanctions system.

The comparison should also include the reference points the policy itself names. The Guidance was drafted with reference to international experience from Europe, several OECD states, and – notably – China and Singapore. China's Interim Measures for the Management of Generative AI Services (Cyberspace Administration of China, 2023) and Singapore's Model AI-Governance Framework for Generative AI (Infocomm Media Development Authority & AI Verify Foundation, 2024) offer the closest state-anchored analogues, while the EU AI Act (European Union, 2024) represents the most developed supranational regime. Set against these, Article 16 is distinctive less for being early than for embedding AI rules within a binding national research-integrity instrument rather than a sectoral or voluntary code.

Table 3 sets Article 16 against these instruments, classified by legal force, to clarify what is distinctive about Vietnam's state-anchored model.

Table 3: Article 16 in comparison with international AI-governance instruments

Instrument (jurisdiction)	Type / legal force	Stance on AI authorship and disclosure	Relation to Article 16
Vietnam – Article 16, Decision 2557 (2026)	Statutory national research-integrity guidance (binding)	AI a support tool only; mandatory disclosure; human accountability	Focal case
COPE (2023)	Voluntary industry guideline	AI cannot be an author; use must be disclosed	Convergent in principle; Vietnam adds statutory force
UNESCO (2022)	Intergovernmental recommendation (non-binding)	Human oversight and accountability; broad AI ethics	Broader remit; Vietnam narrower, research-specific
ALLEA (2023)	Voluntary code of conduct	Fabrication/falsification = misconduct	Convergent; Vietnam embeds it in national law
EU AI Act (2024)	Supranational statutory regulation	Risk-based; transparency duties for generative AI	Most developed regime; Vietnam sector-specific, integrity-anchored
China – Interim Measures (2023)	State administrative regulation	Provider obligations; content and labeling rules	Closest state-anchored analog; named in the Guidance
Singapore – Model Framework for GenAI (Infocomm Media Development Authority, & AI Verify Foundation, 2024)	Voluntary government framework	Trusted-ecosystem principles; provenance	Named reference point; voluntary vs Vietnam's binding instrument

One notable absence in Article 16, compared with some international frameworks, is any explicit reference to algorithmic bias, AI-generated misinformation beyond the research context, or the environmental costs of AI use. The UNESCO Recommendation (2022) addresses these broader concerns, reflecting a more expansive conception of AI ethics. Article 16's narrower focus on research integrity may reflect the Decision's specific statutory mandate rather than indifference to wider concerns. Nevertheless, the provision does not engage with the full spectrum of issues that characterize the global AI ethics discourse.

Vietnam's approach also offers a distinctive contribution to international discussions. By incorporating AI governance into a national scientific integrity regime with statutory grounding, Vietnam demonstrates that emerging economies need not simply adopt international guidelines wholesale but can integrate global norms into locally authoritative regulatory instruments. This

model may prove relevant for other developing nations seeking to balance openness to AI innovation with the protection of research integrity.

The Vietnamese case also raises a broader question for the field of language policy. As AI increasingly mediates the production of specialized discourse in domains such as law, medicine, and science, will states assume the role of discourse regulators? Spolsky (2009) noted that language management is most effective when it aligns with existing beliefs and practices. The long-term success of Article 16 will hinge on which of two outcomes unfolds. One possibility is that the Vietnamese academic community internalizes its underlying ideology, namely, that AI is a tool and that human authorial accountability is non-negotiable. The other is that the practical convenience and competitive advantages of AI-assisted research gradually erode the normative boundaries the policy seeks to establish. This tension between top-down management and bottom-up practice is precisely the dynamic that Spolsky's framework was designed to capture. Its application to AI governance reveals new dimensions of the framework's analytical power.

5.5 Pedagogical Implications for Higher Education

Beyond its regulatory function, Article 16 has direct consequences for teaching and learning in Vietnamese higher education. Because undisclosed AI use is considered misconduct, academic writing programmes must teach students how to disclose AI use, verify sources, and distinguish between acceptable language support and prohibited AI-generated content. This repositions digital and AI literacy from an optional skill set to a core component of research-methods and English for Academic Purposes (EAP) curricula.

The policy is especially consequential for graduate education, where students produce a large share of AI-assisted manuscripts under supervision. Supervisors become front-line interpreters of the policy, responsible for modeling disclosure and for distinguishing acceptable language mediation from fabrication in theses and dissertations, while assessment regimes will need transparent criteria for permissible AI use. In this sense Article 16 operates not only as a research-integrity instrument but as a *de facto* curriculum policy that reshapes how academic writing is taught, supervised, and assessed.

5.6 Limitations and Future Research

The study has limitations that must be acknowledged. As a text-based policy analysis, it cannot assess actual compliance with or impact of Article 16. The analysis does not include empirical data on Vietnamese researchers' AI practices, whether before or after the policy's implementation. The recency of Decision 2557 means that its long-term effects remain unknown.

Future research should address these limitations through empirical investigation. Survey and interview studies of Vietnamese researchers would provide data on actual AI use practices, enabling a fuller assessment of the management-practice gap identified in this analysis. Longitudinal studies tracking institutional responses to the Decision's framework-document model would illuminate the processes through which regulatory text is translated (or fails to be translated) into organizational culture. Comparative studies examining AI-governance

provisions in other ASEAN nations would situate the Vietnamese case within a broader regional context. Future work should also evaluate the effectiveness of integrating AI into EAP instruction under restrictive disclosure regimes, and trace how institutions translate this framework document into internal codes.

5.7 Recommendations

Several actions follow from the analysis. First, the Ministry and relevant institutions should provide guidance that distinguishes between AI use for grammar and translation support and AI use to generate substantive content. This would prevent legitimate language support from being treated as fabrication. Second, because disclosure depends on self-reporting, institutions should develop proportionate verification and disclosure mechanisms rather than rely on unreliable AI-detection tools.

Third, policy should explicitly address the position of non-Anglophone researchers, for whom AI translation is a condition of participation in global publishing, so that transparency does not become a penalty. Fourth, capacity-building and model institutional codes should be provided to smaller institutions to reduce uneven implementation. Finally, for teaching and learning, institutions should integrate AI-literacy and disclosure norms into academic-writing and EAP instruction and into graduate research supervision and thesis assessment, so that the policy shapes classroom practice rather than remaining a compliance document.

6. Conclusion

This study has applied Spolsky's (2004, 2009) language policy framework to the governance of AI in scientific research, using Vietnam's Decision 2557/QĐ-BKHCN (2026) as the focal case, and treating Article 16 as an act of language management within the academic discourse domain. The analysis yielded three findings. First, Article 16 is a carefully structured regulatory intervention that combines absolute prohibitions, affirmative disclosure obligations, and a foundational classificatory claim about AI's status as "*a support tool*" only. Its directive language leaves little ambiguity about the policy's normative intent. Second, the policy encodes a specific ideology of scientific integrity in which authorship, responsibility, and moral agency are exclusively human attributes. AI is denied discursive agency and positioned as an instrument for which human researchers bear complete accountability.

This stance aligns with international norms such as COPE's (2023) position, while translating them into a state-sponsored regulatory template that institutions adopt as binding internal rules. Third, the anticipated gap between management and practices constitutes the primary challenge for the policy's effectiveness. This challenge stems from the policy's dependence on self-disclosure, the absence of granular distinctions among types of AI use, and the delegation of implementation to heterogeneous institutions. The study makes two contributions. Theoretically, it extends Spolsky's framework beyond multilingualism and education into the governance of AI-mediated discourse in specialized knowledge domains. Practically, it shows how a national regulatory

instrument in a developing country can integrate global AI ethics norms into a locally authoritative system. As generative AI continues to transform the production of scientific knowledge, contextually sensitive policy analysis attentive to the policy environments of the Global South will become increasingly necessary.

7. Acknowledgments

We acknowledge Nguyen Tat Thanh University, Ho Chi Minh City, Vietnam, for supporting this study.

We also acknowledge University of Finance – Marketing, Ho Chi Minh City, Vietnam, for supporting this study.

Our gratitude is further extended to the University of Languages and International Studies, Hue University, Hue City, Vietnam, for providing the academic environment in which the authors pursue their doctoral studies.

The authors wish to acknowledge the use of ChatGPT (OpenAI) in the preparation of this paper. The tool was used solely to improve the language and grammar of the manuscript. The authors reviewed and verified all text produced with its assistance, and the paper remains an accurate representation of the authors' work and intellectual contributions.

8. References

- All European Academies [ALLEA]. (2023). *The European Code of Conduct for Research Integrity* (Revised ed.). ALLEA. <https://allea.org/code-of-conduct/>
- Baldauf, R. B., Jr. (2006). Rearticulating the case for micro language planning in a language ecology context. *Current Issues in Language Planning*, 7(2–3), 147–170. <https://doi.org/10.2167/cilp092.0>
- Baldauf, R. B., Jr., & Jernudd, B. H. (1983). Language of publications as a variable in scientific communication. *Australian Review of Applied Linguistics*, 6(1), 97–108. <https://doi.org/10.1075/aral.6.1.06bal>
- Canagarajah, A. S. (2002). *Geopolitics of academic writing*. University of Pittsburgh Press. <https://doi.org/10.2307/j.ctt5hjn6c>
- Committee on Publication Ethics. (2023, February 13). *Authorship and AI tools: COPE position statement*. <https://publicationethics.org/guidance/cope-position/authorship-and-ai-tools>
- Cyberspace Administration of China. (2023). *Interim measures for the management of generative artificial intelligence services* [生成式人工智能服务管理暂行办法]. <https://www.chinalawtranslate.com/en/generative-ai-interim/>
- European Union. (2024). *Regulation (EU) 2024/1689 of the European Parliament and of the Council laying down harmonised rules on artificial intelligence (Artificial Intelligence Act)*. *Official Journal of the European Union*, L, 2024/1689. <http://data.europa.eu/eli/reg/2024/1689/oj>
- Fairclough, N. (1995). *Critical discourse analysis: The critical study of language*. Longman.
- Fishman, J. A. (1972). *The sociology of language: An interdisciplinary social science approach to language in society*. Newbury House.
- Ganjavi, C., Eppler, M. B., Pekcan, A., Biedermann, B., Abreu, A., Collins, G. S., Gill, I. S., & Cacciamani, G. E. (2024). Publishers' and journals' instructions to authors on use of generative artificial intelligence in academic and scientific publishing:

- Bibliometric analysis. *BMJ*, 384, e077192. <https://doi.org/10.1136/bmj-2023-077192>
- Goktas, P. (2024). Ethics, transparency, and explainability in generative AI decision-making systems: A comprehensive bibliometric study. *Journal of Decision Systems*. Advance online publication. <https://doi.org/10.1080/12460125.2024.2410042>
- Government of the Socialist Republic of Vietnam. (2025, October 14). *Decree No. 262/2025/NĐ-CP detailing and guiding the implementation of a number of articles of the Law on Science, Technology and Innovation on information, statistics, evaluation, digital transformation and general matters* [Nghị định số 262/2025/NĐ-CP].
- Gravel, J., D'Amours-Gravel, M., & Osmanliu, E. (2023). Learning to fake it: Limited responses and fabricated references provided by ChatGPT for medical questions. *Mayo Clinic Proceedings: Digital Health*, 1(3), 226–234. <https://doi.org/10.1016/j.mcpdig.2023.05.004>
- Hacker, P., Engel, A., & Mauer, M. (2023). Regulating ChatGPT and other large generative AI models. In *Proceedings of the 2023 ACM Conference on Fairness, Accountability, and Transparency* (pp. 1112–1123). ACM. <https://doi.org/10.1145/3593013.3594067>
- Hagendorff, T. (2024). Mapping the ethics of generative AI: A comprehensive scoping review. *Minds and Machines*, 34(4), Article 39. <https://doi.org/10.1007/s11023-024-09694-w>
- Hyland, K. (2015). *Academic publishing: Issues and challenges in the construction of knowledge*. Oxford University Press.
- Infocomm Media Development Authority, & AI Verify Foundation. (2024). *Model AI governance framework for generative AI*. <https://aiverifyfoundation.sg/wp-content/uploads/2024/05/Model-AI-Governance-Framework-for-Generative-AI-May-2024-1-1.pdf>
- International Committee of Medical Journal Editors. (2024). *Recommendations for the conduct, reporting, editing, and publication of scholarly work in medical journals*. <https://www.icmje.org/recommendations/>
- Johnson, D. C. (2013). *Language policy*. Palgrave Macmillan. 10.1057/9781137316202
- Kirkpatrick, A. (2010). *English as a lingua franca in ASEAN: A multilingual model*. Hong Kong University Press.
- Ministry of Science and Technology of Vietnam. (2026, May 25). *Decision No. 2557/QĐ-BKHCN: Guidelines on scientific integrity and professional ethics in scientific research and technological development* [Quyết định số 2557/QĐ-BKHCN ban hành Hướng dẫn về liêm chính khoa học và đạo đức nghề nghiệp trong nghiên cứu khoa học và phát triển công nghệ]. <https://mst.gov.vn/van-ban-phap-luat/25415.htm>
- National Assembly of the Socialist Republic of Vietnam. (2025, June 27). *Law on Science, Technology and Innovation, Law No. 93/2025/QH15* [Luật Khoa học, công nghệ và đổi mới sáng tạo số 93/2025/QH15].
- Ricento, T. K., & Hornberger, N. H. (1996). Unpeeling the onion: Language planning and policy and the ELT professional. *TESOL Quarterly*, 30(3), 401–427. <https://doi.org/10.2307/3587691>
- Shohamy, E. (2006). *Language policy: Hidden agendas and new approaches*. Routledge.
- Spolsky, B. (2004). *Language policy*. Cambridge University Press. 10.1017/CBO9780511615245
- Spolsky, B. (2009). *Language management*. Cambridge University Press. 10.1017/CBO9780511626470
- Spolsky, B. (2019). A modified and enriched theory of language policy (and management). *Language Policy*, 18(3), 323–338. <http://dx.doi.org/10.1007/s10993-018-9489-z>

- UNESCO. (2022). *Recommendation on the ethics of artificial intelligence*. United Nations Educational, Scientific and Cultural Organization.
<https://unesdoc.unesco.org/ark:/48223/pf0000381137>
- Weber-Wulff, D., Anohina-Naumeca, A., Bjelobaba, S., Foltýnek, T., Guerrero-Dib, J., Popoola, O., Šigut, P., & Waddington, L. (2023). Testing of detection tools for AI-generated text. *International Journal for Educational Integrity*, 19, Article 26.
<https://doi.org/10.1007/s40979-023-00146-z>
- World Conference on Research Integrity. (2010). *Singapore Statement on Research Integrity*.
<https://wcrif.org/guidance/singapore-statement>