# **Artificial Intelligence Policy**

Policy Author: Head of Quality Date of Approval: September 2024

Approved By: SLT Policy Committee Reviewed: Annually

### **Our Mission**

To unleash potential, creating better futures for our learners, businesses and communities

### **Our Vision**

A **Truly Great College**, delivering inspirational learning and excellence through career focused education.

### **Our Values**

Learner and customer focused – ensuring they are at the heart of everything we do

Respectful – by valuing and treating all fairly and as individuals

Passionate – demonstrating energising, engaging and inspiring all to achieve their potential

Collaborative – always working together to achieve excellence and growth

Innovative – leading the way, seeking new ways to continually improve

Excellent – in learning, teaching and assessment; the key to our success



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## 1. Definition and scope

- 1.1 Artificial Intelligence (AI): this is technology that enables a computer to think or act in a more 'human' way. It does this by taking in data, and deciding its response based on algorithms.
- 1.2 In this policy, *generative* Al is being referred to. The Department for Education (2023) defines it as:
  - "Technology that can be used to create new content based on large volumes of data that models have been trained on. This can include audio, code, images, text, simulations, and videos."
- 1.3 AI literacy: this refers to the knowledge and skills needed to understand, interact with, and critically evaluate Artificial Intelligence (AI) systems. It involves being able to comprehend how AI technologies work, their potential impacts on society, and how to use them responsibly. Just as digital literacy encompasses the ability to use digital tools effectively, AI literacy enables individuals to engage with AI systems in a way that is informed, ethical, and reflective of their potential benefits and risks.
- 1.4 This policy draws upon advice from HM Government, Department of Education (DfE), Joint Council for Qualifications (JCQ), Advance HE, and from academics based in UK and international higher education providers.
- 1.5 This policy applies to the use of Al by all employees and learners at the College.

# 2. Principles

The following underlying principles have guided the procedures within this policy:

- 2.1 Al poses opportunities and challenges for the education sector. The College will make the best use of opportunities, build trust, and mitigate challenges to protect integrity, safety and security.
- 2.3 Al tools can make tasks quicker and easier. They generate routine information that would take a human much longer. Al meets the parameters set for it by users, therefore users need to be skilled in asking effective questions.
- 2.4 Using AI tools can improve comprehension and retention of key concepts, reduce frustration and motivate and engage the users (Chen, Chen and Lin 2020 and DfE 2023).
- 2.4 Having access to AI is not a substitute for having knowledge because humans cannot make the most of AI without knowledge to draw upon. We learn how to write good prompts for AI tools by writing clearly and understanding the subject; we sense check the results if we have a schema against which to compare them (University of Exeter 2023). AI is not a replacement for effective teaching, learning or professional development activities.
- 2.5 Information generated by AI is not always accurate or appropriate, so users need skills to verify, analyse, evaluate and adapt material produced by AI tools.
- 2.6 Al tends to be developed by a specific demographic; therefore, it could perpetuate a onedimensional view. Cultural differences and a range of voices may not be generated by Al tools. Users need to be aware of diversity and the potential for bias in Al output.



2.7 Personal and sensitive data entered into Al tools might be shared with unknown parties, posing a security risk and potential data breach.

# 3. Roles, Responsibilities and Procedures

### 3.1 Learners

- 3.1.1 Learners may use AI to support their studies, provided text generated is:
  - Checked for validity, accuracy, reliability and relevance.
  - Free from bias or prejudice and used with integrity.
  - Critically evaluated, like any other information source.
  - Referenced correctly in-text and in final references.

### **In-Text Citations**

- 3.1.2 The in-text citation must follow these rules:
  - State who used the Al tool.
  - Name the AI tool and the developer.
  - State what question was asked, and any additional parameters set.
  - State the year the question was asked/parameters set.
  - Explain that the full response appears in an appendix, and state which one ensure the appendix contains everything generated by the AI tool on this occasion.
  - Evaluate the Al response.
  - If text is taken directly from AI, quotation marks must be used. The text must be exact, including errors or use of American English.

### 3.1.3 In-text citation example 1:

When prompted by the author, ChatGPT responded to the question, 'What is a definition of academic integrity?' with the following:

"An ethical code or set of principles that governs honest and responsible behaviour." (OpenAl ChatGPT 2023)

A copy of the full response can be found in Appendix 1.

This definition does not explain what that code is, or what those principles might be, so is of limited use.

### 3.1.4 In-text citation example 2:

The author's used a different AI tool and specified that the definition should be specific to Higher Education settings. This returned the following response:

"Academic integrity in higher education refers to the ethical and moral framework that guides the behaviour of learners, faculty, researchers, and staff within colleges and universities." (Google Bard 2023).

A copy of the full response can be found in Appendix 2.

This refers to frameworks, and who they apply to, but does not specify what those frameworks might contain, so requires further research to define.

3.1.5 Table 1 below contains analysis of examples used in paragraphs 3.1.3 and 3.1.4, to show how each part of the text in the examples meets the citation rules.



Table 1: Analysis of examples

| Text   | How it meets the in-text citation rules   |
|--|---|
| When prompted by the author  | States who used the AI tool.  |
| ChatGPT responded  | Names the Al tool.  |
| 'What is a definition of academic integrity?'  | States what question was asked.   |
| specified that the definition should be specific to Higher Education settings.                               | States what additional parameters were set.   |
| "An ethical code or set of principles that governs honest and responsible behaviours."                       | As the exact text is taken from AI, quotation marks have been used, and the text includes use of American English (e.g. 'behavior' instead of 'behaviour'). |
| (OpenAl ChatGPT 2023)  | Names the Al tool and the developer. States the year.   |
| A copy of the full response can be found in Appendix 1.  | Explains that the full response appears in an appendix, and states which one.   |
| This definition does not explain what that code is, or what those principles might be, so is of limited use. | Begins to evaluate the Al response.   |
| does not specify what those frameworks might contain, so requires further research to define.                | Begins to evaluate the Al response.   |

## Final Reference List

- 3.1.6 When compiling the final reference list, AI is treated as personal communication. The following information is required for Harvard style referencing of personal communication with AI:
  - Name of AI tool and developer
  - Year (in brackets)
  - Medium of the communication
  - Receiver of the communication
  - Day and month of communication
- 3.1.7 Final reference list example 1:

OpenAI (2023) ChatGPT online response to (name of author), 2nd April.

3.1.8 Final reference list example 2:

Google Bard (2023) Bard online response to (name of author), 3rd April.

- 3.1.9 If AI is used and not referenced, it will be treated as cheating under the College's Plagiarism Policy. It is the learner's responsibility to ensure AI is correctly referenced and that the information gained from AI tools is accurate and used appropriately in the work submitted.
- 3.1.10 If there is an over-reliance on AI, without critical analysis or evaluation, the student will not be considered to have "independently met the marking criteria and therefore will not be



rewarded." JCQ (2023). It is the learner's responsibility to ensure the evidence submitted for assessment demonstrates that they have met the criteria independently of their use of Al.

#### 3.2 Teachers/Tutors

- 3.2.1 Teachers/Tutors must teach learners critical AI literacy, so they have the skills to use it responsibly, ethically and appropriately. This supports learners in preparing for workplaces which are constantly changing. Learners must be able to use emerging technologies by understanding:
  - benefits and limitations
  - reliability and validity
  - potential bias
  - organisation and ranking of information on the internet
  - online safety to protect against harmful or misleading content
- 3.2.2 The following are examples of strategies used by Teachers/Tutors to encourage open and transparent use of AI by Learners:
  - Making the Al policy, and learners' responsibilities under this policy, clear to them during induction, as well as throughout the duration of their programme.
  - Encouraging learners to use AI for feedback on their formative assessments, and then to discuss the value of the AI output with their peers.
  - Asking learners to critique and edit an Al-generated answer, solution, or translation.
  - Openly modelling the ethical, appropriate and critically evaluative use of Al during their teaching, familiarising learners with these tools.
  - Asking learners to reflect on the extent to which AI has been useful for a task/unit and the extent to which a human was needed.
  - Using AI to analyse and draw conclusions from a data set, then discussing the strengths and weaknesses of the output.
  - Getting AI to create experimental design and data collection for research, then comparing with Learners' own approaches.
  - Discussing Al hallucinations (where Al generates false information and presents it as fact), explaining why it might seem plausible.
  - Setting an Al-generated artistic element, e.g. logo design, where learners explain their choice of prompts.
  - Asking Al to identify key themes in reflective logs and asking learners to reflect on and respond to these themes.
  - Asking learners to include an Al-generated literature review and provide a critique.
  - Asking learners to post prompts for advice and solutions for simulations, with critique of results
  - Asking Al to create a structure for a report, paper, article or other written document.
  - Writing clear assignment briefs that include analytical and evaluative use of AI in the tasks.



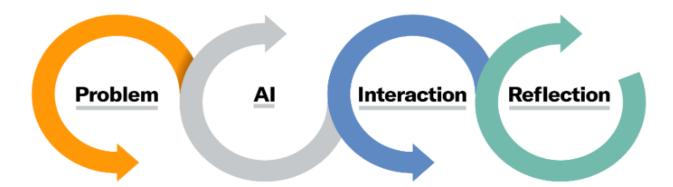
Some examples are shown in table 2 below:

Table 2: Examples of how to include AI in assignment briefs.

| Example of a task  | Adapted task to include planned student use of Al   |  |
|--|---|--|
| Business: Examine the methods organisations use to monitor employee performance.                         | Organisations use a range of methods to monitor employee performance. Compare and contrast the methods used by an organisation of your choice to those generated by Artificial Intelligence (AI).  • Is anything missing from the AI response and why do you think this might be?  • What are the benefits and limitations of using AI to assist Human  |  |
| Health and Social Care: Produce a care plan for the service user in case study 1, giving justifications. | Resources practitioners in writing policies and procedures?  Use an Al tool of your choice to generate a care plan for the service user in case study 1. State the name of the tool, the question prompts used and any additional questions or parameters set.  Evaluate the output:  • How accurate is the plan produced by Al?  • Has Al missed any key points?  • As a human, would you have produced something similar, better or worse? Why?  Evaluate the process:  • What benefits and limitations does using Al have for planning care?   |  |
| Teacher Training: Write a Scheme of Work for a unit you are about to teach in your placement.            | Use AI to produce a Scheme of Learning(SoL) for a unit you are about to teach in your placement. State the name of the tool, the question prompts used and any additional questions or parameters set.  Remember, you must <i>not</i> enter student data into the AI tool as it would be a breach of GDPR.  Evaluate the AI response:  • Could you teach the AI-generated SoL without making any adaptations? Justify your answer.  • How could you improve the SoL generated by AI? Justify your suggestions for improvement.  • What are the benefits and limitations of using AI for planning teaching and learning? |  |

 Using the PAIR framework (Acar 2023) to support Learners in developing AI skills, as shown below:





# Formulate the problem.

Identify the core problem, its components, and constraints.

## Select suitable Al tools.

Explore and identify the most suitable generative AI tools for your problem.

# Interact with the Al tools.

Experiment with different ways to interact; critically evaluate outputs and integrate them to tackle the problem.

## Reflect on the experience.

Evaluate how the generative AI tool helped or hindered problem solving; reflect on your feelings when collaborating with generative AI.

3.2.3 Tutors must familiarise themselves with each individual assessment and awarding body guidance, and make it clear to the learners whether they can and how they may use AI. Sometimes, AI tools can be used in an assistive role.

Learners may be permitted to use AI tools for specific defined processes within an assessment. AI tools can be utilised to enhance and support the development of specific skills in specific ways, as advised by the tutor and required by the specific assessment

3.2.4 Teachers/Tutors must ensure they are aware of possible Al-related assessment issues and how to make assessment more resilient to avoid academic misconduct. Some examples are shown in Table 3 below.

Table 3: Al-related assessment issues and solutions

| Assessment<br>Method | How is it susceptible to Al-related misconduct?   | Ways to make assessment more resilient.  |
|----------------------|---|--|
| Essay                | <ul> <li>Al-generated text could be copied/pasted and presented as the learner's own work.</li> <li>Misconduct is more likely when tasks are broad or generalised.</li> </ul> | <ul> <li>Use centre-devised briefs which are topical, current and specific, or require the creation of original content.</li> <li>Apply knowledge to real-world problems.</li> <li>Include personal reflections on learning in the brief.</li> <li>Ask for commentary or annotation on drafts.</li> <li>Ask for specific reading lists, resources and papers to be used which are not freely available outside the College.</li> <li>Include a requirement for some original research in the brief.</li> </ul> |
| Presentation         | <ul> <li>Could use Al to<br/>generate a script</li> <li>Al-generated voice<br/>or hologram could<br/>deliver a virtual<br/>presentation</li> </ul>                            | <ul> <li>Include interactive elements as part of the presentation, e.g. questions, demonstrations, discussions.</li> <li>Learners include a personal reflection on the task.</li> <li>Group presentation.</li> </ul>   |



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|--|---|---|
| Online exam                              | <ul> <li>Could generate text and copy/paste.</li> <li>More likely to occur if questions are based on information recall, summaries of concepts, essays or opinion questions.</li> </ul>   | <ul> <li>Exam questions must test critical thinking, reflection, and analysis.</li> <li>Ask for personal examples in exam responses.</li> <li>Use scenario-based questions.</li> <li>Ask problem-solving questions.</li> <li>Ask for specific learning activities from the unit to be referred to in the answer.</li> <li>Ensure that access to online Al tools is restricted on centre devices used for exams and where necessary according to specific assessment guidelines.</li> </ul>  |
| Reflective<br>Logs                       | Learners could copy<br>and paste Al-<br>generated text into<br>their logs.  | <ul> <li>Include a peer review session as part of formative assessment, which Learners must respond to in their log.</li> <li>Get Learners to write about personal work experience in their log.</li> <li>Include a section in the log on how learning might be applied to different contexts.</li> </ul>   |
| Reports<br>based on<br>Practical<br>Work | <ul> <li>Learners could copy and paste AI - generated text or data into reports.</li> <li>More likely when generic report formats are used, the emphasis is on data collection and analysis, there is limited observation of practical work.</li> </ul> | <ul> <li>Supervised practical work can help ensure the authenticity of data collected.</li> <li>Assign unique or tailored practical work to each student.</li> <li>Require detailed discussion of methodology used, the process, and results collected.</li> <li>Use group work and collaboration during practical work.</li> <li>Use peer review and assessment when writing reports.</li> <li>Include a presentation or professional discussion as well as a report.</li> </ul>   |
| Portfolio of<br>Evidence                 | Learners could copy<br>and paste Al-<br>generated text,<br>images and designs<br>into portfolios.   | <ul> <li>Focus on real-world problem-solving in assignments.</li> <li>Use creative tasks that draw upon personal experiences.</li> <li>Include commentary, annotation and documenting processes, alongside justification for the approach taken.</li> <li>Include self-assessment, reflection tasks and peer review.</li> <li>Examine intermediate stages in the production of work to ensure that it is underway in a planned and timely manner and that work submitted represents a natural continuation of earlier stages.</li> <li>Encourage portfolios that include a range of assessment methods and evidence types.</li> </ul> |

3.2.5 Learner submissions can be run through AI detectors, such as OpenAI Classifier, GPT Zero or GLTR, but these are not always accurate or reliable. They base their scores on the predictability of words and may give lower scores where text has been subsequently adapted.



They should be used alongside other methods for checking authenticity in a holistic approach to academic misconduct.

- 3.2.6 Some indications that a submission may have been generated using AI include:
  - use of American spelling, currency, terms and other localisations
  - use of language or vocabulary which might not be appropriate to the qualification level
  - lack of direct quotations and/or references where these are required/expected
  - lack of graphs/data tables/visual aids where these would normally be expected
  - · references which cannot be found or verified
  - lack of reference to events occurring after a certain date
  - incorrect/inconsistent use of first-person and third-person perspective
  - difference in the language style used when compared to that used by a learner in the classroom or in other previously submitted work
  - submission of learner work in a typed format, where their normal way of working is handwritten
  - inclusion by learners of warnings or provisos produced by AI to highlight the limits of its ability, or the hypothetical nature of its output
  - use of a conclusion or statement that does not logically follow from what was previously said
  - lack of specific local or topical knowledge
  - content of a generic nature rather than relating to the learner themself, the task or scenario
- 3.2.7 Teachers/Tutors must make sure learners understand submission and declaration forms cover the use of AI in the evidence they have submitted. This should be pointed out during induction, with reminders at each assessment point during the course.
- 3.2.8 Al tools can be used in the production of learning resources, plans and documents, provided the following points are considered:
- (i) Teachers/Tutors must carefully check their own Al-generated materials to protect learners from potentially harmful, inaccurate or biased content.
- (ii) In many cases, a given tool will not have been trained on the English curriculum and AI can only return results based on the dataset it has been trained on. Teachers/Tutors cannot assume that AI output will be comparable with a human-designed resource that has been developed in the context of the College's curriculum.
- (iii) The quality and content of the final document, plan or resource remains the professional responsibility of the teacher who produces it, and the College.
- 3.2.9 Teachers/Tutors can use Al tools to generate assessment feedback to learners, providing it is motivational, specific, developmental and personalised for the learner. Al may be able to do this but should always be checked as the lecturer knows the individuals best and how they might respond to feedback. Al can be effectively used to give instant feedback to Learners on formative assessment tasks, e.g. online quizzes.
- 3.2.10 In order to protect learners and staff, personal and sensitive data must *never* be entered into AI tools. This would be a breach of GDPR.
- 3.2.11 If a lecturer believes AI has been used without crediting it as a source of information, the Malpractice and Maladministration Policy and the Plagiarism Policy should be followed. The



lecturer needs to report it as a suspected case of cheating to the Programme Leader and Lead IQA for further investigation.

3.2.12 If there is over-reliance on AI to the extent that the lecturer decides the learner has not *independently* demonstrated the assessment criteria, the work submitted will *not* be awarded a pass and should be referred for resubmission. The lecturer's feedback must clearly explain how the use of AI contributed to the referral, so the learner is aware of how to improve their use of AI in future.

### 3.3 Programme Leaders

- 3.3.1 Programme leaders need to monitor induction activities, learning resources, plans and documents produced by Teachers/Tutors using AI, for appropriateness and accuracy. They need to ensure Teachers/Tutors are following the most recent version of the policy and are aware of their responsibilities.
- 3.3.2 Use of AI should be included on the agenda for regular discussion at Programme Team Meetings to support a collaborative approach to ethical use of AI.
- 3.3.3 If a need for Professional Development relating to AI amongst team members is identified, Programme Leaders must notify the Head of Quality Improvement and Head of Teaching, Learning & Assessment so this can be arranged.
- 3.3.4 Use of AI must be included in onboarding processes. Programme Leaders must also ensure their team members have undertaken mandatory GDPR training and updates.
- 3.3.5 Where cases of cheating by using AI are suspected, Programme Leaders should advise Teachers/Tutors in their team and ensure the Head of Quality Improvement and Lead IQA are aware of each case, supporting the resulting investigation where necessary.

### 3.4 Internal Quality Assurers (IQA)

- 3.4.1 IQAs must be aware of all issues relating to use of Al above, so they can support high quality, ethical assessment processes and consistent practice in the College. Monitoring the appropriate use of Al in assessment is an important part of the internal verification process.
- 3.4.2 The Lead IQA, along with the Head of Quality Improvement, will investigate and recommend outcomes for any breaches of the Academic Misconduct Policy that involve AI.

### 3.5 All Employees

- 3.5.1 All employees need to be vigilant with regards to cyber security, particularly as Al could increase the sophistication and credibility of attacks (DfE 2023).
- 3.5.2 Employees may use AI in their own work, provided:
  - No private or sensitive data is entered into AI tools
  - Al tools are credited and referenced correctly (see paragraphs 3.1.2 to 3.1.8)
- 3.5.3 Any employee who suspects AI has been used by learners inappropriately should report this to the Head of Quality Improvement and Lead IQA for further investigation.



### 3.6 Ethical Use of Al Tools and Data Protection (GDPR Compliance)

- 3.6.1 Personal Data Protection: Users must avoid inputting personal, sensitive, or identifiable data into AI tools unless explicit consent is obtained and the data is required for a legitimate educational or business purpose. This is in compliance with the General Data Protection Regulation (GDPR) principles of data minimisation and purpose limitation.
- 3.6.2 Consent and Transparency: Individuals whose data is entered into AI systems must be informed about how their information will be used, stored, and processed. Users of AI should obtain explicit consent from individuals before using their personal data in AI-generated tasks or outputs.
- 3.6.3 Data Security: Al tools used in the College should adhere to strict security standards to ensure that personal data is protected from breaches, hacking, or misuse. This includes ensuring that Al providers implement encryption and data security protocols to protect all processed data.
- 3.6.4 Avoidance of Sensitive Data: Sensitive personal data (such as health records, financial information, or information that can directly identify an individual) must not be input into Al tools without explicit permission from the individual. Failure to adhere to this could result in a breach of GDPR and disciplinary action under the College's Malpractice & Maladministration Policy.
- 3.6.5 Data Controller Responsibilities: Users who input personal data into AI systems must act as responsible data controllers, ensuring that all actions comply with GDPR. The College, as a data controller, is accountable for ensuring AI use follows GDPR guidelines, and any breaches should be reported to the Data Protection Officer immediately.
- 3.6.6 GDPR and Al Providers: When using third-party Al tools, the College must ensure that the Al provider complies with GDPR, especially regarding cross-border data transfers outside the EU. The College will review Al vendors' data protection measures and only use tools that meet GDPR standards.

### 4. References & Linked Policies

Acar, O.A. (2023) Are Your Learners Ready for Al? A 4-step framework to prepare learners for a ChatGPT world. *Harvard Business Publishing: Education*, June 15 2023. Available at https://hbsp.harvard.edu/inspiring-minds/are-your-Learners-ready-for-ai?

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Malpractice & Maladministration Policy



# Plagiarism Policy

Assessment Marking & Feedback Policy

# 5. Review

This policy will be periodically monitored in light of legislative, regulatory, codifiable or necessary changes, and in any event, formally reviewed and revised, if necessary, on an annual basis in July/August

