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Artificial Intelligence (AI) Usage Policy	DEP001	V1

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LEAD PERSON	Group Director of Digital Education and Artificial Intelligence		
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ARTIFICIAL INTELLIGENCE (AI) USAGE POLICY

Policy Statement

Activate Learning recognises the transformative potential of artificial intelligence (AI) and commits to harnessing it for educational excellence and business efficacy.

The AI policy aims to govern the use of AI to:

- Foster innovation in teaching and learning
- Incorporate AI in business practices to develop efficiencies
- Ensure ethical and responsive AI use of Bring Your Own (BYO) AI tools
- Oversee the development of AI tools to support staff and students

This policy aligns with Activate Learning's commitment to empowering learning. At the heart of this are the principles of our Learning Philosophy and values which ensures our staff and learners have access to cutting-edge technology and training, developing their digital knowledge, skills, and mindsets**.**

Purpose

The AI policy intends to set out Activate Learning's approach to the use of Artificial Intelligence (AI) including guidelines and rules for the use of AI tools. Activate Learning's aim is to maximise the benefits of AI while reducing risks and ethical concerns.

- Integrate AI into teaching, learning, and assessment
- Integrate AI into research and administrative processes
- Promote data-driven decision-making
- Safeguard privacy and fairness

The use of AI aligns with our group's vision to achieve far-reaching, progressive change and impact through learning. Providing talent for business and transforming lives through our Learning Philosophy by empowering every learner to reach their full potential.

Scope

This policy applies to all AI use within and on behalf of Activate Learning:

- All staff and students
- AI related activities across all departments
- Processes involving data collection, analysis and deployment of AI solutions

Responsibilities

As users of BYO AI tools and services, we are all responsible for:

- Protecting the information, we share online
- Following relevant policies and procedures
- Ensuring advice, guidance and training is applied in operation

Group Director of Digital Education and AI is responsible for:

- Setting up an AI Committee and Steering Group to govern and steer adoption of AI tools across the organisation including new AI development
- Implement and train appropriate AI tools to support teaching, learning and assessment.
- Explore how AI can promote organisational efficiency.

Directors, managers and team leaders are responsible for:

- Ensuring their teams follow this policy and relevant procedures and guidelines, and

- Ensuring their teams maintain data protection when using BYO AI tools

Digital Education Services and AI Team are responsible for:

- Ensuring tools developed maintain data protection and strictly adhere to our organisational policies and procedures
- Providing advice, guidance and training about the use and/or misuse of AI

Commitment Statement

Activate Learning commits to:

- Safe, ethical and legitimate use of AI
- Transparency in AI decision making
- Regular guidance and training for staff and students
- Continuous improvement of AI solution development

AI Applications

A list of recommended AI tools, and applications which can be used, can be found on the HERE. This list is amended regularly, and applications may be removed at any time. It is your responsibility to check in advance of using any AI in the workplace that your chosen application is suitable for use. Please contact the Digital Education Services and AI team with any concerns or comments you may have regarding the use of any of the listed AI applications.

New AI application and tools can be suggested. There will be an approval process for the usage of these apps which will include the evaluation of the tools in terms of security and data protection regulations.

Use which is permitted

You may use Generative AI for the following tasks provided that any information gathered or content generated is only generated, reviewed and used in accordance with the rules as set out in this Policy. Examples include, but is not limited to the following:

- Drafting and editing documents
- Producing presentations, slides and charts, podcasts, videos
- Generating content for social media posts, website articles and think pieces
- Brainstorming ideas
- Research assistance
- Analysing non personal data to extract data insights.
- Automating or streamlining repetitive administrative tasks

When you use AI-based features, you understand and agree that:

- The content may not always be accurate. You should not rely on the content produced as the sole source of truth or factual information, or as a substitute for support and professional advice.
- You must evaluate the content for appropriateness and accuracy for your use before sharing out content.

Use which is not permitted

This section outlines the types of text that are prohibited from being inputted into the textbox of any BYO AI chatbot, including copyrighted material, personal information, hate speech, illegal activity, explicit content, misinformation, and malicious code.

- **Copyrighted Material:** Text from copyrighted books, articles, songs, online documentation, code repositories or other media without permission.
- **Personal Information:** Names, addresses, phone numbers, health-related data, national insurance numbers, or any other personally identifiable information.
- **Hate Speech:** Content promoting hate, discrimination, or violence against individuals or groups based on certain characteristics.
- **Illegal Activity:** Text that encourages or promotes illegal activities, such as drug use, hacking, or other criminal behaviour.
- **Explicit Content:** Graphic violence, pornography, or other adult content.

- **Misinformation:** Deliberately false or misleading information, such as impersonation of another individual, or organisation.
- **Malicious Code:** Text that includes or suggests malware, viruses, or harmful software.

Considerations, Risks and Limitations

Generative AI tools process vast amounts of data to generate responses, but they have significant limitations. It's crucial for students and staff to understand the opportunities, limitations, and ethical issues related to using these tools. As generative AI capabilities evolve, users must be aware of the following aspects:

- **Privacy and data considerations**: whether a generative AI tool is designed to learn directly from its users' inputs or not, there are risks to privacy and intellectual property associated with the information that students and staff may enter. If sensitive or personal information or even commercially confidential information is entered into the AI tool, it could be shared on a wider basis overtly or indirectly as the AI tool learns. Users must be aware of the risk of data breaches or privacy violations and exercise caution with the data that they input into the AI tool.
- **Potential for bias**: generative AI tools produce answers based on information generated by humans which may contain societal biases and stereotypes which, in-turn, may be replicated in the generative AI tool's response. This can affect decision-making, recommendations, and user experiences. Biased AI can lead to unfair outcomes, reinforcing existing inequalities. Users must be aware of this and critically evaluate AI-generated content.
- **Inaccuracy and misinterpretation of information**: data and information contained within generative AI tools is gathered from a wide range of sources, including those which may be poorly referenced or incorrect. Unclear commands or information may also be misinterpreted by generative AI tools and produce incorrect, irrelevant or out-of-date information. This means that accountability for the accuracy of information generated by these tools when transferred to another context lies with the user.
- **Ethics codes:** users of generative AI tools should be aware that while ethics codes exist, they may not be embedded within all generative AI tools. Some AI tools may not transparently communicate whether they adhere to specific ethics codes. Users might find it challenging to verify this information independently.
- **Plagiarism:** generative AI tools re-present information developed by others and so there is the risk of plagiarised content and/or copyright infringement being submitted by a user as their own, and artwork used by image generators may have been included without the creator's consent or licence.
- **Equity and inclusion:** AI technologies have the potential to perpetuate or exacerbate existing biases. The costs and limitations associated with some tools also mean that access and therefore the benefits may not be available to everyone.
- **Accurate content:** AI is being increasingly used to create content and images that appear legitimate but could be used in a negative way. AI is also being used to simulate contact and conversations. This is a safeguarding risk and has the potential to cause harm.
- **Age Restrictions**: Creators impose age restrictions to ensure fairness and safety for example:
    - Microsoft CoPilot – Activate Learning IT account holders must be over 18 years old to use Microsoft CoPilot in a secure way
    - Google Gemini - users must be over 18 years old
    - ChatGPT - users must be over 13 years old, but if they are under 18, written consent from a parent or carer must be provided to Open AI (the creators of ChatGPT).

Misuse of AI

Activate Learning employs Turnitin and the expertise of its staff to monitor potential misuse of AI in student assessments.

Any violation of this policy may be treated as a disciplinary issue. For students, misuse of AI could lead to the rejection of their assessment, potentially affecting their program completion.

Activate Learning's Assessment and Verification Policy includes guidelines on the use and misuse of AI in assessment submissions. These guidelines help students and staff understand AI and the rules set by the Joint Council for Qualifications (JCQ) and Awarding Organisations regarding AI tools in assessment submissions.

The use of AI in student work must be properly identified and referenced. Examples of AI misuse by students include:

- Copying or paraphrasing sections of AI-generated content, making the work no longer their own.
- Copying or paraphrasing entire responses of AI-generated content.
- Using AI to complete parts of the assessment, resulting in work that does not reflect their own efforts.
- Failing to acknowledge the use of AI tools when they have been used as a source of information.
- Incomplete or poor acknowledgment of AI tools.
- Submitting work with intentionally incomplete or misleading references or bibliographies.

Work submitted for assessments must be the students' own. This means ensuring that the final product is in their own words, not copied or paraphrased from another source such as an AI tool, and that the content reflects their own independent work.

Students and apprentices are expected to demonstrate their own knowledge, skills, and understanding as required for the qualification in question, as outlined in the qualification specification.

Any use of AI that prevents students from independently demonstrating their own attainment is likely to be considered malpractice. (JCQ, jcq.org.uk/exams-office/malpractice/artificial-intelligence/, 2023)

The individual staff are responsible for any misuse of AI tools or for using applications that fall outside the list of recommended apps. This accountability extends to ensuring compliance with organisational guidelines and safeguarding against the misuse of AI tools.

Implementation, Oversight and Monitoring

Activate Learning reserves the right to monitor use of AI applications on its systems and to monitor other activity for potential misuse of AI by students or staff.

Any questions or issues arising from using AI should be referred to the AI Committee.

The AI Committee will advise the Group Executive Team (GET), Group Leadership Team (GLT) and Education Leadership Team (ELT) on the use of AI applications, ensuring alignment with technical developments and ethical guidelines and principles.

Any complaints or challenges about Activate Learning's use of AI or anything pertaining to this Policy should be addressed through the Complaints Policy and Procedure.

Audits of the use of AI systems will be conducted to assess their impact, identify potential issues, and ensure compliance with ethical standards.

References

This policy should be read in conjunction with the policies and guidance identified below, all policies can be found on SharePoint:

- Information Security and Data Protection Policy
- Acceptable Use Policy
- Assessment and Verification Policy
- Safeguarding and Child Protection Policy
- Refer to the UK National AI Strategy[1] and ICO's AI and Data Protection Guidance[2].

Appendices

Acceptable Use AI Guidance Table

Developing an acceptable AI use guidance in education for teachers, students and all business staffs involves considering ethical, privacy, and inclusivity aspects to ensure responsible deployment of AI technologies. Guidance is essential also to steer organisations, policymakers, and developers in the development and implementation of AI systems.

By implementing and adhering to this guidance, staff, teachers and students can benefit from the positive aspects of AI while ensuring ethical considerations and responsible use in the learning environment.

1. Transparency and Explainability	2. Fairness and Equity	3. Privacy Protection	4. Student and Staff Empowerment	5. Ethical Use and Inclusivity	6. Security and Data Governance	7. Feedback Mechanisms	8. Collaboration and Co-Creation	9. Educational Equity	10. Continuous Monitoring and Ethical Oversight
Understandable AI Systems - Ensure that AI applications used in education are designed to be transparent and provide explanations for their decisions and recommendations, especially in assessment and grading systems	Bias Mitigation - Regularly assess and mitigate biases in AI algorithms, particularly in applications related to student assessments, grading, and recommendations, to prevent discriminatory outcomes.	Informed Consent: Obtain clear and informed consent from students and teachers before collecting, processing, or sharing any personal data through AI applications.	Educational Value: Prioritise AI applications that enhance the educational experience, support personalised learning, and provide valuable insights to both teachers and students.	Adherence to Educational Values: Ensure that AI applications align with educational values, promoting fairness, inclusivity, and respect for diversity.	Secure Data Handling: Implement robust security measures to protect student and staff data from unauthorised access or breaches.	User Feedback Loops: Establish mechanisms for teachers and students to provide feedback on AI-driven features, allowing for continuous improvement and addressing concerns.	Collaborative Development: Involve teachers, students, and educational stakeholders in the development and decision-making processes of AI applications to ensure they meet the specific needs of the educational community.	Resource Allocation: Use AI to identify and address disparities in resource allocation, ensuring that educational resources and opportunities are distributed equitably.	Ethical Review Boards: Establish ethical oversight committees within educational institutions to review and assess the ethical implications of AI use in education.
User-Friendly Interfaces: Develop user interfaces that allow teachers and students to easily understand and interpret AI-driven insights without requiring advanced technical knowledge.	Diverse Data Representation: Ensure that AI models are trained on diverse and representative datasets to avoid perpetuating existing biases and inequalities	Data Anonymisation: Implement robust data anonymization techniques to protect the privacy of individuals while still allowing for valuable insights.	Training and Support: Offer training sessions and ongoing support to teachers and students to ensure they understand how AI tools work and can maximize their benefits.	Accessibility: Develop AI tools that are accessible to students with diverse needs and abilities, ensuring that technology does not create disparities in educational opportunities	Data Governance Policies: Establish clear policies for data governance, including encryption, secure storage, and responsible data sharing practices	Adaptation to User Needs: Ensure that AI applications can adapt to the evolving needs and preferences of teachers and students based on user feedback.	Co-Creation Initiatives: Encourage collaborative initiatives where educators and students actively contribute to the design and improvement of AI tools.	Closing Achievement Gaps: Leverage AI applications to identify and address factors contributing to achievement gaps among diverse student populations	Periodic Audits: Conduct regular audits and assessments of AI applications to ensure ongoing adherence to ethical standards and educational values. Retain our commitment to providing students with skilled tutors.