

Generative AI (GenAI) Policy

Process of ratification:	Academic Board
Executive Team Member Responsible:	Academic Dean
Individual Responsible:	Clare Miller, David Hilborn AI Working Group
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A. Preamble

This summary from the QAA (May 2023) sets out the situation (particularly with respect to text-based GenAI):

‘The rapid rise of Generative Artificial Intelligence software since OpenAI released ChatGPT in November 2022 has far reaching implications for higher education. From initial excitement about the potential for innovative approaches to teaching and learning, through concerns about academic integrity and cheating, to redesigning assessment with artificial intelligence in mind, the sector is grappling with how to adapt to a Generative Artificial Intelligence-enabled world.

‘Generative Artificial Intelligence tools are based on large language models (LLMs) such as ChatGPT and have been trained with vast databases to write coherent text in a particular style according to the instructions (prompts) given by the user. These LLMs are accessed through interfaces such as ChatGPT ... which have already found wide application in multiple workplaces and are increasingly being integrated into word-processing and other software tools, and will soon be as ubiquitous as predictive text and grammar-checking software.

‘In March 2023, OpenAI released GPT-4 which has a larger database, faster speed and improved performance across a range of measures, including factual accuracy, compared to GPT-3. The availability of these tools means that providers are already dealing with a significant number of hybrid submissions in which Generative Artificial Intelligence tools have been used as an assistive technology, to generate initial ideas, or to refine the final submission by correcting grammar/spelling, or removing redundant text to meet a word limit. We are aware that a variety of approaches have been adopted to date - for example, some providers have taken the decision to encourage students in their use of Generative Artificial Intelligence tools, while others have asked that students do not make use of it unless they are given explicit permission to do so.’¹

¹ <https://www.qaa.ac.uk/docs/qaa/members/maintaining-quality-and-standards-in-the-chatgpt-era.pdf>

For reference, in July 2023 the 24 Russell Group universities committed to the following principles on the use of generative AI tools in education:

1. Universities will support students and staff to become AI-literate.
2. Staff should be equipped to support students to use generative AI tools effectively and appropriately in their learning experience.
3. Universities will adapt teaching and assessment to incorporate the ethical use of generative AI and support equal access.
4. Universities will ensure academic rigour and integrity is upheld.
5. Universities will work collaboratively to share best practice as the technology and its application in education evolves.²

The Department of Education has also set out its position on the use of generative artificial intelligence in the education sector and various documents are linked at relevant points below.

B. Principles

General

1. Content-producing Generative Artificial Intelligence (GenAI) is set to play an ever-greater role in every part of our lives, including aspects we cannot predict. No educational institution can realistically isolate students from this rapidly-developing technology or prevent it impacting their educational experience – nor should we.
2. GenAI cannot be consistently detected since it generates unique text.³ Any tools built to detect its use are not sufficiently reliable to enable the enforcing of zero-tolerance policies, and educators cannot rely on detecting its use through stylistic clues. The diversity and rapid development of GenAI software means current detection techniques soon become obsolete.⁴ No educational institution can expect to stay ahead of the technology in such a way as to make zero-tolerance policies workable.
3. The rapid adoption and integration of AI tools, including GenAI, into a wide range of other software and online tools means that students may not even be aware of their use. For example, in using Microsoft Office programs and online tools such as Grammarly.
4. Not all students may be able to access or use GenAI tools. For example, there will be varying levels of IT-literacy and different access to digital tools depending on cost and availability.
 - a. Care must be taken to ensure that existing attainment gaps are not exacerbated as students use new tools for assessments.⁵
5. Students at other universities are being supported or permitted to use GenAI in assignments and this risks LST students being put at a disadvantage in assessment preparation, grading and skills-development.⁶
6. Like many other activities, using GenAI tools can have ethical implications. Students and employees should be given opportunity to explore these implications. In certain

² [rg_ai_principles-final.pdf \(russellgroup.ac.uk\)](https://www.russellgroup.ac.uk/ai-principles-final.pdf)

³ <https://arxiv.org/abs/2306.15666>

⁴ See e.g. Advance HE ‘the poacher will always be ahead of the gamekeeper’ <https://www.advance-he.ac.uk/news-and-views/higher-education-era-ai>

⁵ <https://wonkhe.com/blogs/towards-an-inclusive-approach-to-using-ai-in-learning-and-teaching/>

⁶ Examples: <https://www.monash.edu/student-academic-success/build-digital-capabilities/create-online/using-artificial-intelligence>

circumstances, as deemed appropriate by the relevant teacher, module leader, programme leader, line manager or management team, students and employees may be allowed to 'opt out' of GenAI-use on ethical and/or conscience grounds.

Skills development

7. AI tools are likely to be part of a student's future professional life. Understanding how to use these tools effectively and appropriately will be a key professional skill.⁷

*'Developing critical artificial intelligence literacy alongside other foundational academic skills, such as correct citation and referencing and critical thinking, is important for two reasons. First, because we anticipate that if it is not already a key graduate attribute, it very soon will be. Secondly, students will enter tertiary education with considerable prior experience of these tools without necessarily having the background to use them responsibly.'*⁸

8. Students should be supported to use GenAI tools appropriately, effectively and safely. They should be taught to employ these tools in ways which will enrich and support their education, while being mindful of their weaknesses. For example:
 - a. GenAI writing tools are excellent at collating and summarising material, structuring and writing text, and paraphrasing. GenAI is also useful for turning prompts into images, video and audio.
 - b. However, GenAI tools can produce material which is inaccurate, biased, out of context, or out-of-date.
9. GenAI tools can make certain tasks quicker and easier, but should not replace the judgement and deep subject knowledge of a human expert.⁹
10. GenAI tools can produce unreliable information, therefore any content produced requires academic judgement to check for appropriateness and accuracy.¹⁰
11. Using GenAI is not a substitute for knowledge in long-term memory. To make the most of GenAI, one needs to have the knowledge to draw on. A person can only:
 - a. learn how to write good prompts if they can write clearly and understand the domain they are asking about.
 - b. sense-check the results if they have a schema against which to compare them.¹¹
12. Learning how to effectively express ideas and arguments in writing is a key academic and professional skill. In addition, writing helps develop understanding and aids recall. Students should be supported to develop their own writing skills and these should be assessed appropriately.
13. Research, summarisation and analysis are key academic and professional skills. It is unclear how great a role AI tools will play in supporting these skills in future. Nevertheless,

⁷ https://www.qaa.ac.uk/docs/qaa/members/maintaining-quality-and-standards-in-the-chatgpt-era.pdf?sfvrsn=2408aa81_10

⁸ <https://www.qaa.ac.uk/docs/qaa/members/reconsidering-assessment-for-the-chat-gpt-era.pdf>

⁹ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

¹⁰ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

¹¹ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

students should be taught to employ these skills effectively, both with and without AI assistance.

14. Critical evaluation, already a key skill, will grow in importance as AI-generated content becomes more common. Students must be taught to assess all written work and other media for accuracy, reliability and relevance. This will include both online and published material.
15. GenAI tools will be most effective when used to support rather than replace one's own writing. Research, evaluation and writing skills will continue to be key.

Assessing skills and learning outcomes

16. Programmes should assess quality of written English and other professional skills. However, it is not necessary for every module to assess *all* skills, including writing skills.
 - a. Learning outcomes for some modules may be met by students making use of GenAI tools for some aspects of an assignment. For example, in assignments where GenAI is used to support writing, students may be primarily assessed in their evaluation or presentation skills.
17. Closed book written or oral exams, or equivalent practical exams, remain the most secure way to assess recall and writing skills without use of digital technology.
18. A variety of assessment approaches and formats is best practice in all programmes. The challenges posed by GenAI offer 'a generational incentive for ... programme and module teams to review and, where necessary, reimagine assessment strategies.'¹²
19. Students should be supported to develop AI-literacy alongside academic writing skills; hybrid approaches are likely to be the future.

*'Developing discipline-relevant academic writing skills that allow learners to demonstrate their ability to acquire and synthesise knowledge remains an important element ... Hybrid submissions of coursework that combine the output from Generative Artificial Intelligence tools with the learner's own work are already commonplace. In the short-term, allowing hybrid submissions in which the contribution of Generative Artificial Intelligence is fully acknowledged and is in keeping with institutional policies and guidelines, is a useful transitional arrangement as providers plan for the near future in which Generative Artificial Intelligence is embedded in the licensed software used by staff and students.'*¹³

Academic Misconduct and Integrity

20. Using GenAI to generate the final text of an assignment is comparable to asking another person to write an assignment or acquiring it from an 'essay mill' website, and should be treated in the same way, according to the Academic Misconduct Policy. These offences may be difficult to detect but where discovered should attract heavy penalties, being considered deliberate 'cheating'.
21. To ensure transparency and integrity with regard to submitted work, any use of GenAI in student assignments should be clearly indicated to markers.

¹² <https://www.qaa.ac.uk/docs/qaa/members/reconsidering-assessment-for-the-chat-gpt-era.pdf>; see also 'Positioning assessment differently in a world of AI'

<https://www.youtube.com/watch?v=bQR7ObyBjTo&list=PLAbF8wnSF-e9NtkDroMxrZaXYQhD0Wxv8&index=7>

¹³ <https://www.qaa.ac.uk/docs/qaa/members/reconsidering-assessment-for-the-chat-gpt-era.pdf>

22. Appropriate use of GenAI tools within permitted parameters is allowed and may be considered good practice.

C. Policy

C.1 Assessments

23. Unless otherwise specified in a module's assessment instructions, students may use GenAI tools in assignments to assist with some tasks, for example:

- a. Researching and summarising publicly available information. Only tools which include links to sources should be used, and these should be checked;
- b. Revising their own knowledge on a topic, e.g., summarising key information;
- c. Developing their own understanding of concepts or applying discipline knowledge in new contexts;¹⁴
- d. Collating, summarising or analysing uploaded material where this is their own work or empirical data;
- e. Generating initial ideas, e.g. drafting lists, plans or structures that can be adapted based on their own understanding of the topic;¹⁵
- f. For revision, such as generating topic summaries in their first language or revision questions based on their own notes;
- g. Supporting their preliminary understanding of complex texts;
- h. Automatic transcription (e.g. of interviews or videos used in research);¹⁶
- i. Proofreading

24. GenAI should not be used by students to:

- a. Produce large parts – or the whole – of an assignment or other submission (such as discussion forum posts) from a prompt.
- b. Transform notes, draft text, or writing in another language, into academic English;
- c. Produce summaries of another author's work and present this as their own work;
- d. Substantially change the style, format or content of a draft assignment so that the AI-edited/rewritten version bears little resemblance to their own previous draft.

25. Where a student seeks to upload data, audio or text – either their own or another person's – to a GenAI tool, they should ensure that appropriate steps are taken to ensure privacy and data security.

- a. Where possible, GenAI tools that do not use user input to train their models, or which have the option to 'opt out' of using user data, must be used.¹⁷

¹⁴ <https://about.open.ac.uk/policies-and-reports/policies-and-statements/gen-ai/generative-ai-students>

¹⁵ OU guidance <https://about.open.ac.uk/policies-and-reports/policies-and-statements/gen-ai/generative-ai-students>

¹⁶ See point 25.

¹⁷ Current examples include CoPilot, NotebookLM, Claude, Gemini and logged-in ChatGPT accounts.

- b. Uploaded data must have identifying information removed, including for audio transcriptions.¹⁸
 - c. Particular care must be taken to ensure that copyrighted text, audio or images are not used to train GenAI models without the permission of the rights-holder.
 - d. If in doubt students should seek advice from their supervisor or module leader.
- 26. Teaching staff must ensure that assessment instructions include clear guidelines for AI use, particularly where this varies from the general guidelines above. This may include guidance on which tools may be used and how.
- 27. Students must ensure that final work submitted for assessment is demonstrably their own. If any sections of their work are reproduced directly from AI generated responses/media, those elements must be clearly identified by the student, either verbally for oral presentations and examinations, on the cover sheet provided for written assessments (see Appendix), or in any other media appropriate to the particular assignment. Failure to disclose use of A.I. may affect the student's grading, and/or may be construed as Academic Misconduct, with penalties applied accordingly in proportion to the extent of undisclosed or inappropriate A.I. usage.¹⁹
- 28. Submitted work remains the responsibility of the student who has submitted it. Students must ensure that their work has been checked for accuracy and sources have been referenced appropriately. GenAI tools cannot be blamed for content errors or academic misconduct.
- 29. For written assignments, GenAI use must be acknowledged on the title page This should include the names of the tools used. Failure to do so will constitute academic misconduct.
 - a. For written assignments, a cover-page template will be provided to students, with a tick list indicating types of use, e.g. No Use /Outline/First Draft/Research Support/ Paraphrasing.
 - b. Additional explanatory comments/self-reflection should be provided by students.
 - c. This A.I. declaration should be included on all written submissions, even if no use of A.I. has been made. In this case the student can write 'No Use'.
 - d. As in Paragraph 27 above, use of A.I. for assignments in non-written media (e.g. viva voce exams, verbal presentations, videos, visual submissions) should be declared in the medium appropriate to that assignment (e.g. orally in verbal exams and presentations, in the credits on a video, or as a caption or accompanying text for a visual submission).
 - e. Declared GenAI use within permitted parameters will not be penalised by markers.
 - f. Declaring appropriate use of A.I. tools may inform feedback to students and shape any future study support they receive.
- 30. For Music and Worship assignments involving Studio A.I. tools, an A.I. Usage Log must be included within the final submission. This log should document the following:
 - a. A.I. Tools Utilised: A comprehensive record of the specific software or platforms employed.

¹⁸ For more on this see point 25.

¹⁹ JCQ guidance https://www.jcq.org.uk/wp-content/uploads/2024/02/AI-Use-in-Assessments_Feb24_v3.pdf

- b. Purpose: A concise explanation of the rationale for using each tool in relation to the task at hand.
 - c. Workflow and Justification: A detailed account of how the tool was integrated into the student's creative or academic process, elucidating its contribution to the outcome.
- 31. Programme teams must creatively review assessment strategies across their programmes. Possible strategies include reducing assignments susceptible to misuse of GenAI tools, reducing redundancy in meeting level outcomes, diversifying assessment formats, enhancing cross-programme synthesis, increasing application in real-life settings.²⁰
 - a. Some assignments may involve deliberate use of GenAI tools in structured and creative ways. This will help students develop AI-literacy and critical skills.
- 32. Written assignments should normally be designed to ensure that students are not able to rely too heavily on GenAI tools (except where this use is part of the assessment task). This might include requiring personal reflection or creative presentation, and/or ensuring that questions are sufficiently specific/detailed to make it difficult for a GenAI tool to respond fully.
 - a. Teaching staff should check how popular GenAI tools, for example ChatGPT, respond to their assignment titles and guidance.
- 33. Additional modes of assessment – alongside written coursework – such as structured interviews, presentations, tasks and viva voce examinations, should be considered for formative or summative assessments in some modules.²¹
 - a. Students may be asked to describe and defend their written work or may be questioned on their understanding of key principles.
- 34. Where a module seeks to assess recall and/or writing skills *without any use of AI tools*, this should be done by written or oral examination.
 - a. At least one core module at each level of an undergraduate programme should be assessed by unseen written exam.
- 35. Where a student with a disability is allowed to use a laptop to write an exam, invigilators should ensure that this is not connected to the internet and, if using Microsoft Word or an equivalent word-processing programme, that 'Text Predictions' (or equivalent tools) are switched off.
- 36. Programme Leaders and Executive Team members should familiarise themselves on a regular basis with published guidance regarding A.I. use, for example the JCQ guidance 'AI Use in Assessments: Protecting the Integrity of Qualifications'²² and take reasonable steps to prevent misuse of AI in assessments.

²⁰ See suggestions and table at <https://www.qaa.ac.uk/docs/qaa/members/reconsidering-assessment-for-the-chat-gpt-era.pdf>; also Reading University's 'A-Z of Assessment Methods' https://sites.reading.ac.uk/curriculum-framework/wp-content/uploads/sites/35/2022/03/A-Z_of_Assessment_Methods_FINAL_table.pdf; Exeter University's 'Generative AI and Assessment Matrix' <https://documents.advance-he.ac.uk/download/file/document/10640>; Lydia Arnold's 'Assessment Top Trumps' <https://lydiaarnold.net/2022/11/14/expanded-assessment-top-trumps/>;

²¹ See more at <https://www.qaa.ac.uk/docs/qaa/members/reconsidering-assessment-for-the-chat-gpt-era.pdf>

²² <https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/>

37. Appropriate, effective and safe use of GenAI tools will be covered in Study Skills sessions.

C.2 Other Use of GenAI

38. Employees may make use of GenAI tools for tasks such as the following:

- a. Researching and summarising publicly available information. Only tools which include links to sources should be used and these should be checked.
- b. Summarising or paraphrasing uploaded material where this is their own work or comes from a published source. Where another's work is used, this should be appropriately referenced.
- c. Summarising and analysing data, with appropriate permissions and attention to privacy and data security (see C.3 below).
- d. Summarising and analysing institutional documents, with appropriate permissions (see C.3 below).
- e. Producing an outline, structured template or draft of a document, such as a policy or report.
- f. Paraphrasing their own writing.
- g. Making a transcript of a recorded meeting using integrated tools in Zoom or Teams, and summarising or analysing this transcript, e.g. for the purpose of creating minutes.
- h. Producing or editing images, audio and video for internal use or publication, with appropriate permissions (see below).
- i. Developing code, such as Excel formulae or website plugins.

39. Where employees are uploading institutional data or other internal materials to an A.I. programme or app, e.g. to produce summaries or analysis, this use should be checked with their line manager to ensure GDPR compliance. Where there is any query about safe use of data this should be sent to the Director of Finance and Administration.

40. In whichever ways GenAI tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it.²³

41. Use of GenAI tools must be acknowledged in written documents during the drafting and consultation process, but the final published version (e.g., policy or report) does not need a comment regarding the drafting process. References should be added as normal.

42. Where GenAI tools are used to produce images or media, this should be done appropriately, safely and with the required permissions:

- a. Where GenAI tools are used to produce images or media based on the image or voice of an LST employee, former employee, student or alumni member, explicit written consent must be obtained both before use and before publication (after

²³ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

reviewing final version). No person may be coerced or otherwise pressured into giving consent for such use, and may withdraw their consent at any time.

- b. GenAI tools must not be used to produce images or media based on the image or voice of an identifiable person outside LST, such as a public figure—except in the following circumstances:
 - i. Use in creative or satirical work where it is clear that the produced image or media is fictional;²⁴
 - ii. As part of a research project, lecture or presentation, showing an example of such media created by another person or organisation, with credit duly given;
 - iii. Where individuals cannot be identified, for example in a blurred crowd scene or showing only hands;
 - iv. Or, where explicit written permission has been obtained from the relevant party.
- c. Where GenAI tools are used to produce images or media, their use must be acknowledged.

43. All staff must ensure that material uploaded to GenAI follows the guidelines on IP and privacy set out below. Failure to do so may result in disciplinary action.

C.3 Intellectual Property (IP) and Privacy

44. AI-generated media is usually understood to be uncopyrighted and in the public domain. In UK law an ‘Author’ must be a person, yet there is provision for a programmer to be recognised as the creator. The balance of creative rights is yet to be established in court and therefore employees should employ any AI-generated material with caution.²⁵

- a. The IP of written work or media produced with assistance from GenAI is presumed to rest with the person who publishes the final work. This does not include references to other source material or media, which should be attributed in the normal way.
- b. However, students or employees should not seek to publish or otherwise claim IP of media or written material which is solely written by GenAI.

45. Most generative tools will use the inputs submitted by users to further train and refine their models. IP can only be used to train AI if there is consent from the rights holder or an exemption to copyright applies.²⁶

- a. When in doubt consult the Director of Finance and Administration.

²⁴ This is assumed to fall under fair use.

²⁵ Middlesex University guidance, <https://unihub.mdx.ac.uk/study/copyright/ai>

²⁶ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

46. Since an AI stores and learns from the data it is given, any data entered should not be identifiable, in accordance with the principles of the GDPR.²⁷
- a. Identifiable data includes names, images, voice and other types of identifying information.
47. Student work should not be used to train GenAI models, without appropriate consent or exemption to copyright.²⁸
- a. Students own the IP rights to original content they create.
 - b. Written consent must be given for any use of student work to train GenAI models.

²⁷ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

²⁸ <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education> . Needs expanding. Not sure what this clause means

Appendix 1: Example Cover Sheet

How does the author of Acts make use of Agrippa and Bernice as characters in his drama (Acts 25-26)?

Joe Bloggs

TH5

5 November 2024

2997 words

Dr Cor Bennema

TH5204 Acts

AI Declaration

I used AI in the following ways in preparing this assignment:

- *Research*
- *Proofreading*

Details of AI use:

I used ChatGPT to help find some initial information about Agrippa and Bernice (though I checked this in my reading) and to check some words I didn't understand in articles. I also used Grammarly to proofread my essay, though I did not use all its suggestions.