

Generative Artificial Intelligence (GAI) policy

Policy number: POL162

Table 1: Policy reference

Item	Description
Lead Officer (Post)	Head of Corporate Systems Compliance
Responsible Office/ Department	Corporate Governance
Responsible committee and officer	QAEC
Review Officer (Post)	Head of Corporate Systems Compliance
Date policy approved	13/03/2024
Date policy last reviewed and updated	13/03/2024
Date policy due for review	Every 2 years
Date of Equality Impact Assessment	27/03/2024
Date of Privacy Impact Assessment	DPIA screening: 20/03/2024, no DPIA required.

Table 2: Policy summary

Item	Description
Overview	Generative Artificial Intelligence (GAI) tools and sites have the potential to significantly enhance and potentially revolutionise the way in which we learn, teach, conduct research, and carry out professional duties. The use of GAI within these contexts must be governed by considerations for ethics, privacy, and legislation.
Purpose	The policy discharges UHI's moral and legal duty to ensure that it complies with relevant legislation and maintains its general duty of care to its students.
Scope	All FE and HE learning and teaching staff, learning and teaching support staff, researchers (LTR staff) and all students.
Consultation	GAI SLWG Director of Corporate Governance, UHI Director of IT and Digital Infrastructure (ITDI), UHI University Archivist and Records Manager, UHI Data Protection Officer QAEC Academic Council
Implementation and monitoring	The University and academic partners are individually responsible for ensuring that the policy and procedures are followed in their own institution.
Risk implications	This policy will reduce risks associated with the use of Generative Artificial Intelligence tools and sites. Failure to adhere to the policy:

Item	Description
	<ol style="list-style-type: none"> 1. Legislative: risk of the university not meeting the requirements of relevant data protection and Copyright laws. 2. Reputational: risk of damage to the reputation of the University. 3. May disadvantage students. Insert.
Link with strategy	Learning and Teaching Enhancement Strategy (LTES)
Equality Impact Assessment	27/03/2024
Privacy Impact assessment	DPIA screening: 20/03/2024, no DPIA required.

1. Policy statement

The University of the Highlands and Islands (UHI) is committed to embracing new technologies that can enhance the quality of education and the overall student experience. Generative Artificial Intelligence (GAI) has the potential to revolutionise the way in which we learn, teach, conduct research, and carry out professional duties. The use of GAI within these contexts must be governed by considerations for ethics and privacy. GAI is subject to bias and discrimination, and there are serious concerns about the potential for unauthorised access to sensitive data. As such, it is essential that use of GAI is implemented in a responsible and ethical manner, guided by the principles of transparency, accountability, sustainability, and privacy.

Only [UHI approved GAI tools](#) may be used. The policy of non-proliferation of technologies applies to GAI tools.

2. Definitions

Algorithm: in computing, this is a set of instructions enabling machines to carry out tasks.

Artificial Intelligence (AI): a broad field of computer science that focuses on developing machines and computer systems capable of performing tasks that would typically require human intelligence.

Chatbots: can handle routine administrative tasks such as answering student inquiries, providing course information, and assisting with enrolment procedures. They can be available 24/7, reducing the burden on administrative staff and improving the overall student experience.

Generative Artificial Intelligence (GAI): a category of AI that includes chatbots and Large Language Models (LLMs) that generate content (text, images, audio, movies, music, computer code etc.,) by responding to questions and/or instructions (called prompts) from users.

Large Language Models (LLMs): An Artificial Intelligence algorithm that is trained on large amounts of data, enabling it to generate what appears to be coherent content, despite having no understanding of the content it is generating.

LTR staff: for the purposes of this policy, “LTR staff” refers to UHI and UHI Partnership learning and teaching staff, learning and teaching support staff and staff researchers. Any use of GAI for non-learning and teaching professional services staff will be regulated in a separate policy.

Prompts: instructions or questions input into GAI tools to obtain generated content, e.g. text, images, audio, movies, music, computer code etc.

3. Purpose

This policy governs the use of Generative Artificial Intelligence (GAI) tools and sites for all University partnership LTR staff and students. Any use of GAI for non-learning and teaching professional services staff will be regulated in a separate policy.

This policy is guided by [UHI Principles on the use of Generative AI tools](#).

4. Scope

This policy applies to UHI, the UHI Partnership LTR staff and all students. Any use of GAI for non-learning and teaching professional services staff will be regulated in a separate policy.

5. Exceptions

None.

6. Notification

The policy will be published on UHI’s website and SharePoint Policies area.

LTR staff will be made aware of the policy, principles and associated guidance through team meetings and information being cascaded from senior management teams.

Students will be made aware of the policy at induction, in unit, module and programme related information, (including programme handbooks) as appropriate, and (where appropriate) the VLE.

7. Roles and responsibilities

QAEC is responsible for approving the policy and ensuring its legal compliance.

Principals and Senior Management Teams are responsible for overseeing operational compliance with the policy, and cascading information to appropriate teams.

UHI Deans and Associate Deans are responsible for cascading information to appropriate teams.

Line managers are responsible for supporting relevant staff to follow the policy in their day-to-day role.

Relevant staff are responsible for following the policy in their day-to-day role and highlighting any operational challenges that arise.

The Head of Corporate Systems Compliance is responsible for developing the policy, accommodating any legislative changes, and submitting the policy to Academic Council and Partnership Council for endorsement.

8. Legislative framework

[Copyright, Designs and Patents Act 1988.](#)

[Data Protection Act 2018.](#)

[Freedom of Information \(Scotland\) Act 2002.](#)

[Section 61 Code of Practice 61 on Records Management.](#)

[The Strategic Framework for a Cyber Resilient Scotland.](#)

9. Related Policies, Procedures, Guidelines and Other Resources

[Academic Standards and Quality Regulations.](#)

[Acceptable Use Policy.](#)

[Copyright Policy.](#)

[Data Protection Policy](#).
[Freedom of Information and Environmental Information Regulations Policy](#).
[Learning and Teaching Enhancement Strategy](#).
[Research Policy and Ethics](#).
[Student Conduct Policy](#).
[UHI Intellectual Property Policy](#).
[UHI Partnership Bring Your Own Device Policy](#).
[UHI Partnership Information Security Policy](#).
[UHI Partnership Retention and Disposal Policy](#) (staff access).
[University Records Management Policy](#) (staff access).
[UHI Principles on the use of Generative AI tools](#).
[Staff guidance on the use of Generative AI](#).
[Student guidance on the use of Generative AI](#).

10. Procedures

This policy is to be read and applied in conjunction with [UHI's Generative AI guidance for LTR staff](#), [Student guidance on the use of Generative AI](#) and [UHI's Principles on the use of Generative AI tools](#). All use of GAI tools must comply with [UHI's Acceptable Use Policy](#). LTR staff and students conducting research must comply with [UHI's Research Policy and Ethics](#).

GAI tools may not be used to generate harmful content or messages with the intent to harm others, spread false information, or engage in unethical activities. Use must be informed by professional ethical standards.

Use of GAI: GAI tools or chatbots may only be used by researchers, learning and teaching staff and learning and teaching support staff. GAI may not be used for learning and teaching administrative work, or other “professional service records”, e.g. writing exam board minutes. GAI may not be used by professional services staff. Any use of GAI for non-learning and teaching professional services staff will be regulated in a separate policy.

Copyright

LTR staff and students must comply with [UHI's Copyright Policy](#). GAI generated work may include unacknowledged or incorrectly cited and referenced copyrighted or licensed work. Content generated by GAI tools must be verified against reliable sources before using or sharing such information.

GAI referencing

LTR staff and students must reference their use of GAI tools as follows.

1. LTR staff and student use of GAI to help inform work, research etc., but not directly quoted or paraphrased in such work. For every GAI tool used:
 - a. list the tool name and version;
 - b. list the name of the company that owns the GAI tool;
 - c. list the tool URL;
 - d. state how you use the GAI tool;
 - e. state if you or someone else wrote the prompt(s) (if someone else, provide their details);
 - f. provide the date you used the GAI tool and
 - g. state how the GAI answers helped you with your work.

2. LTR staff and student use of GAI content (paraphrase, directly quote from or input GAI generated content into your work, course work or assessment). Clearly cite and reference such content as personal communication using the appropriate UHI referencing system.

Generated AI tools' terms, conditions, and privacy policies

LTR staff and students must:

- read, understand, and accept the terms, conditions, and privacy policies of GAI tools before using them; and
- know how to control cookies and trackers that GAI sites place on their devices as explained on UHI's [External web site disclaimer](#).

Accounts and passwords

UHI has approved several GAI tools that require you to sign up with an email address and create a password.

- For study and work purposes, (where an email address is required) use your UHI email address to sign up. **Do not use** your university password to log in to any external account.
- You must use a strong, unique password, that is only used to access that tool **and no other system**. The password must comply with [UHI policy - strong password information](#).
- GAI accounts created using UHI email addresses may not be used for personal or matters unrelated to UHI.

Student use of generative AI (GAI)

You will be informed by your tutor/lecturer if and how you may use GAI for your studies and assessed work. **Note:**

- If you have not been told anything about the use of GAI, then its use is not permitted.
- If you have not been given information on, and do not understand, the ethical use of GAI, you may not use it.
- If you are not certain if you may use it, check with your tutor/lecturer first.

You must not submit content created by GAI as your own work, this is plagiarism.

You may not use GAI to alter, paraphrase or edit content that has been written by someone else. For example, you may not input content from a journal or book into a paraphrasing tool and submit the generated content as your own work.

You must acknowledge that you have used GAI in your submitted course work and/or assessments as follows:

1. If you use GAI to help you with your course work or assessment but **did not submit** anything created by GAI in your submission, for every GAI tool you used you must follow the instructions in the Referencing section, point 1 above.
2. If you paraphrase, directly quote from or input GAI generated content into your course work or assessment, you must follow the instructions in the Referencing section, point 2 above.

Your tutor/lecturer may also ask you to provide a list of your prompts, the GAI responses, and the details in point 1 above, as an appendix to your assessed work. Make sure you keep detailed records each time you use GAI for course work or assessed work.

You **may not** put any course materials or assessment questions into GAI tools.

If you use material created by GAI in work you submit for assessment and do not acknowledge this or (where appropriate) cite and reference it correctly as described in the Referencing section above, this is plagiarism as you will be using work that you did not create yourself. This is a form of academic misconduct.

If you are in any doubt, or have questions regarding this policy, you must contact your tutor/lecturer or Personal Academic Tutor (PAT) **prior to using GAI**.

Learning and Teaching staff use of generative AI (GAI)

LTR staff must comply with UHI's Generative AI Policy and [UHI's Acceptable Use Policy](#). Researchers must comply with [UHI's Research Policy and Ethics](#). Any use of GAI for non-learning and teaching professional services staff will be regulated in a separate policy.

LTR staff may only use [approved GAI tools](#) for work purposes. These are also listed on the [Artificial intelligence](#) (staff access) of the [Staff Resources index](#) (staff access).

For work purposes, LTR staff may not sign in to any GAI tool using a Facebook or Google account. LTR staff must sign in using their UHI email and password unique to that service and may not sign up to any GAI tools that have not been approved.

All use of GAI must be acknowledged as specified in the Referencing section above.

Note: be aware that any content that LTR staff curate, create or produce using GAI will potentially make that same content (in 'as is' or further amended form) available to other users of GAI. This requires careful consideration of the appropriate point at which the refinement of content to create a specific resource is to be taken forward without any further use of GAI.

LTR staff may not use GAI generated content or resources in unreviewed and/or unrefined form (that is, in the form originally generated by GAI) for learning and teaching purposes, unless their review of that content has confirmed it can be used 'as is.' Such content must be acknowledged as specified in the Referencing section above.

LTR staff may not disseminate or submit for publication in any form (including blogging, short articles, journal papers, book chapters) any written scholarly or research publications that have been generated by GAI. While GAI generated content can inform research and scholarship, the published work of staff must be original and the direct result of their own individual or collaborative writing (not withstanding normal academic conventions of referencing and citing other sources).

The following **may not** be included as GAI prompts or partial prompts or input into any chatbot:

1. UHI and UHI Partnership records.
2. Personal data.
3. Sensitive or confidential information about UHI, the UHI Partnership, students, clients, or colleagues.
4. Student work.
5. Commercially sensitive information.
6. Research proposals.
7. Research data. Research data analysis should be conducted using dedicated data analysis applications.
8. Material copyrighted by third parties.
9. Items listed in the policy guidance.

This is not an exhaustive list, for more information, and what constitutes a learning and teaching record, consult the policy guidance.

GAI tools may not be used to transcribe interviews and meetings. Recording and transcribing must comply with [UHI's recording policy and instructions](#).

Use of GAI with students

LTR staff will determine student use of [UHI approved GAI tools](#) in their units or modules. **Note:** if it is decided that GAI may not be used for assessment, then use of authentic assessment is recommended.

Students must be informed if and how they can use [UHI approved GAI tools](#) at induction, in unit, module and programme related information, (including programme handbooks) as appropriate, and (where appropriate) in UHI's Virtual Learning Environment. Students must be directed to this policy, the [Student guidance on the use of Generative AI](#) and [UHI's External web site disclaimer](#). LTR staff should familiarize themselves with the information in the [Student guidance on the use of Generative AI](#).

If use of GAI is permitted for assessed work:

1. LTR staff should decide if they wish to see evidence of how students used GAI. For example, students may be asked to provide all prompts and answers to each prompt in an appendix to their submitted work.
2. As required for all assessments, the appropriate coversheet containing the GAI statement must be used:
 - a. [Assessment coversheet SQA](#).
 - b. [Assessment cover sheet undergraduate](#).
 - c. [Assessment cover sheet postgraduate](#).

To ensure compliance with legislation and fulfil their duty of care, LTR staff may only ask students to use [approved GAI tools for teaching and research](#), **providing** students have attained the minimum age for the use of the technology. Students must be directed to the relevant privacy notice and terms and conditions prior to use.

LTR staff may not:

- request or require their students to sign up for non-approved GAI accounts in the context of their programme of studies or associated learning, teaching, assessment, or research activities; or
- suggest that students create non-approved GAI accounts to support their university work; or

- require students to use GAI tools if they have not attained the minimum age specified in the terms and conditions of use.

Use of GAI detectors

Due to the flaws of GAI detectors, such as generating false negatives and positives, their bias, and the failure to provide supporting evidence, coupled with the speed of the development of GAI tools, UHI is not using a GAI detector. LTR staff may not submit student work to any AI detector.

11. Version control and change history

Table 3: version control and change history

Version	Date	Endorsed by	Amendments	Author
0	05 March 2024	QAEC	N/A	Andy Brown