UNIVERSITY OF LONDON

Artificial Intelligence (AI)

Policy

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University of London AI Policy

This policy is primarily concerned with generative artificial intelligence and related developments, but it also applies to other types of AI such as machine learning and our initial approach to any new emerging forms of AI.

The University of London is committed to innovation in the delivery of its strategy and mission. Artificial intelligence provides both opportunities and challenges for how we develop and deliver our educational programmes, our research and knowledge exchange activities and our commitment to public engagement in the arts and humanities. It also enables new ways of working and of the delivery of our internal and external facing professional services.

The University of London wishes to maximise the benefits of artificial intelligence whilst recognising that artificial intelligence technologies, their operational capabilities and the implications of these new and emergent technologies are constantly evolving. These technologies require us to consider the opportunities, benefits, and risks within developing legal and ethical and good practice frameworks.

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1.1 The University of London is committed to innovation in the delivery of its strategy and mission. Artificial intelligence provides both opportunities and challenges for how we develop and deliver our educational programmes, our research and knowledge exchange activities and our commitment to public engagement in the arts and humanities. It also enables new ways of working and of the delivery of our internal and external facing professional services.

1.2 The University of London wishes to maximise the benefits of artificial intelligence whilst recognising that artificial intelligence technologies, their operational capabilities and the implications of these new and emergent technologies are constantly evolving. These technologies require us to consider the opportunities, benefits, and risks within developing legal and ethical and good practice frameworks.

2. What do we mean by Artificial Intelligence (AI)?

2.1 This policy is primarily concerned with generative artificial intelligence and related developments, but it also applies to other types of AI such as machine learning and our initial approach to any new emerging forms of AI.

2.2 Generative AI is a subset of AI that specialises in creating new content based on patterns learned from existing data. Key aspects include:

- Content creation: generative AI can produce original text, images, audio, video, and other media.
- Creative applications: It is used for tasks like writing, art generation, music composition, and code synthesis.
- Underlying technology: generative AI often utilises deep learning techniques like GANs (Generative Adversarial Networks) and transformer models.

2.3 The University understands that the term Artificial Intelligence (AI) refers to the broader field of computer science focused on creating intelligent machines that can perform tasks requiring human-like intelligence. These include a wide range of technologies and approaches, including Machine learning; Natural language processing; Computer vision; Robotics; and Expert systems.

2.4 In general, these AI systems are designed to analyse data, recognise patterns, make decisions, and solve problems within specific domains. They excel at tasks like classification, prediction, and optimisation, and there are many benefits to be gained from their use for some tasks. There are also, as with generative AI, risks that must be mitigated and legal and ethical requirements that must be considered.

3. What principles has the University adopted?

3.1 The University therefore commits to an overarching set of principles based on its own work and that of the Russell Group. These principles are designed to support our intention to maximise the benefits of artificial intelligence in support of our strategy, mission, and values. They do so by providing a framework for our work and thinking in relation to the use of artificial intelligence:

3.2 The principles are as follows. The University will:

i. Work collaboratively with the Federation, our partners, and other stakeholders to maximise the benefits of AI and develop and share good practice as the technology and its application in education, research and service provision evolves.

ii. Support AI-literacy through learning and skills development for its students and staff.

iii. Ensure that our use of and approach to AI is clear, fair, and transparent.

iv. Adapt and keep under regular review its policies, practices, and services to ensure and promote the legal, ethical, and inclusive use of AI in all areas of its work.

v. Ensure we uphold and maintain the highest standards of academic rigour and integrity in education and research.

vi. Ensure that we are pro-active in monitoring, understanding, and mitigating discriminatory impacts arising from the use of AI and that we are engaged and innovative in using AI to enhance our commitments to equity and inclusion.

vii. Within the parameters of our mission, values and strategic commitments consider, understand, and take proportionate action to address the wider impacts of AI on society and the environment.

4. What do these principles mean in practice?

4.1 Working collaboratively with the Federation, our partners and other stakeholders to develop and share best practice as the technology and its application in education, research and service provision evolves. The University will engage and collaborate with key stakeholders such as the Federation, our global partners, Recognised Teaching Centres, schools, employers, professional bodies who accredit degrees, AI experts, and leading academics and researchers, to help ensure an inter-disciplinary, international and multisectoral approach to addressing emerging opportunities and challenges and to promote the ethical use of generative AI.

Engagement and dialogue between staff (academic and professional) and students as well as academic partners, and business and industry (as partners and stakeholders) will be critical to establishing a shared understanding of the appropriate and ethical use of generative AI tools. Ensuring this dialogue is regular and ongoing will be vital given the pace at which generative AI is evolving.

4.2 Supporting AI-literacy through learning and skills development for its students and staff. Generative AI tools are capable of processing vast amounts of information to generate responses, but they have significant limitations. It is important that all students and staff understand the opportunities, limitations and ethical issues associated with the use of these tools and can critically evaluate and apply what they have learned as the capabilities of generative AI develop.

4.21 Developing AI Literacy:

(a) The University will provide guidance and training to help students and staff understand how generative AI tools work, how to critically evaluate their outputs, and where they can add value to work, research, and study and what their limitations are.

(b) By increasing AI-literacy, the University will:

- equip students with the skills needed to use these tools appropriately throughout their studies and future careers.
- ensure staff have the necessary skills and knowledge to deploy these tools to support student learning and adapt teaching pedagogies, as well as developing themselves.
- ensure that staff are able to adopt new research techniques and methodologies and are also able review and improve professional services in support of our all aspects of our work.

(c) The University will continue to develop resources and training opportunities, so that we are able to provide students with clear guidance on how to use generative AI to appropriately support their learning, teaching, assessment and research, and staff with clear guidance on how to appropriately support their research activities and professional service functions.

4.22 AI literacy requires an understanding of a range of legal and ethical issues (Please also see Section 5) which include:

(a) 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.

(b) Information Security: steps must be taken to protect the security of the University's computer systems and networks when AI is being used through corporate systems. This includes using appropriate security measures to protect against malicious attacks and ensuring that users are aware of the risks associated with using the technology. Similarly, the University will work with third-party suppliers to ensure that services used by the University are equally secure.

(c) Risk of bias and discrimination: generative and machine learning 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 AI tool's outputs.

(d) Inaccuracy and misinterpretation of information: data and information contained within generative AI tools is garnered from a wide range of sources, including those that are poorly referenced or incorrect. Similarly, unclear commands or information may be misinterpreted by generative AI tools and produce incorrect, irrelevant, or out-of-date information. Similarly, poor instruction/algorithm design can lead to significant output errors. Accountability for the accuracy of information generated by these tools when transferred to another context lies with the user or organisation.

(e) Ethics codes: users of AI tools should be aware that while ethics codes exist, they may not be embedded within all AI tools and that their incorporation, or otherwise, and effectiveness may not be something that can be easily verified or assessed.

(f) Copyright infringement/Plagiarism: generative AI tools in particular re-present information developed by others and so there is the risk of the content provided by such tools being plagiarised content and/or copyright infringement and of then being submitted or published by a user or organisation as their own. This includes artwork used by image generators that may have been included without the creator's consent or licence.

(g) Exploitation: the process by which generative AI tools are built can present ethical issues. For example, some developers have outsourced data labelling to low-wage workers in poor conditions.

4.3 Ensuring that our use of and approach to AI is clear, fair, and transparent. Generative AI should not be used to create unfair or inequitable conditions for students, staff, research participants, visitors, or other users of our services. The use of generative AI should be as transparent as possible, so that users have an understanding of how the technology and its algorithms are being deployed and whether any of their data held by the University is being used, and if so, how.

4.4 Adapting and keeping under regular review its policies, practices, and services to ensure and promote the legal and ethical use of AI in all areas of its work. The University, the Federation and the wider HE sector will need to regularly evaluate policies and guidance for staff and students relating to generative AI tools and their impact on teaching, learning, and assessment practices, our research and public engagement activities and our professional service.

The University will monitor the effectiveness, fairness, and ethical implications of the integration of generative AI tools into academic and professional life and adapt its policies and procedures to ensure they remain valid as generative AI technologies evolve.

4.5 Ensuring we uphold and maintain the highest standards of academic rigour and integrity in education and research. The University will regularly review its academic practices, regulations, policies, procedures, and guidance to reflect the emergence of generative AI and sector wide good practice as it develops.

(a) The incorporation of generative AI tools into teaching methods and assessments has the potential to enhance the student learning experience, improve critical reasoning skills and prepare students for the real-world applications of the generative AI technologies they will encounter beyond university.

(b) Appropriate adaptations to teaching and assessment methods will vary by discipline, and protecting this autonomy is vital. All staff who support student learning should be empowered to design teaching and learning materials, developmental experiences, and approaches to assessment that incorporate the creative use of generative AI tools where appropriate and ethical. Professional bodies will also have an important role in supporting universities to adapt their practices, particularly in relation to accreditation.

(c) Ensuring academic integrity and the ethical use of generative AI will be achieved by cultivating an environment where students and staff can ask questions about specific cases of their use and discuss the associated challenges openly and without fear of penalisation.

(d) Being clear and transparent is critical to maintaining consistent and high standards of learning, teaching, and assessment and of research ethics, conduct, and integrity.

(e) The University will make it clear to students and staff where the use generative AI is inappropriate and are intended to support them in making informed decisions and to empower them to use these tools appropriately and acknowledge their use where necessary.

4.6 That we are pro-active in monitoring, understanding, and mitigating discriminatory impacts arising from the use of AI and that we are engaged and innovative in using AI to enhance our commitments to equity and inclusion.

(a) Use of positive action measures including Equality Impact Assessment, regular statistical analysis and action planning, and the development of staff and student AI and data literacy to enhance the critical use of novel AI tools and systems and tackle algorithmic discrimination. This will help ensure that potential risks are proactively understood and addressed.

(b) The University will also consider how best to respond to a likely proliferation of subscription services for AI tools which may sit behind paywalls or be restricted to paying subscribers. It will need to consider equity of access so that students and staff can access the generative AI tools and computing resources they need in support of their teaching and learning experiences and practices.

4.7 Within the parameters of our mission, values and strategic commitments consider, understand, and take proportionate action to address the wider impacts of AI on society and the environment. The University acknowledges that the use of AI can impact both positively and negatively on some of our other policy commitments and our approach to enabling social good and to environmental sustainability.

(a) The environmental cost of AI should be considered in the context of procurement decisions and cost benefit analyses of its potentially widespread adoption across the University.

(b) The University should remain alert and responsive to any unforeseen but significant social, ethical, or environmental impacts arising from its use of AI and take appropriate action where it is able, or it is required.

5. When must you seek advice before proceeding with AI work?

- You must read the following and seek advice as appropriate if you are going to be working with AI tools.

- Under no circumstances should you implement new AI software or an AI service (I.e., purchasing a service or solution for an institutional function) without following ITDS procedures.

- This does not preclude the use of freely available or personally purchased AI tools to enhance your productivity, however under no circumstances should personal data, confidential business information, proprietary UoL content (*our IP, whether owned solely or jointly, or IP licensed by us from a third party)*, or privileged legal advice be inputted into AI tools by UoL staff, students or partners without seeking advice and making sure appropriate controls are in place. UoL students and alumni must be made aware that they are prohibited from inputting proprietary UoL learning materials into AI tools unless exceptions (such as certain open access rights) apply.

5.1 Purchasing or contracting new software that utilises AI or implementing AI tools within existing applications.

Where should I seek advice?

- If you are planning to purchase or contract new software that utilises AI or implements AI tools within an existing application you should seek advice from the IT Security Team, via your ITDS Business Partner, who will conduct a security assessment.

Why must I seek advice?

- The University must take all reasonable steps to protect the security of its computer systems and networks when AI is being used through corporate systems. This includes using appropriate security measures to protect against malicious attacks and ensuring that users are aware of the risks associated with using the technology. Similarly, the University should work with third-party suppliers to ensure that services used by the University are equally secure.

5.2 Using AI in the development or delivery of teaching, learning or assessment.

Where should I seek advice?

- You should seek advice from Academic Service Managers (UoLW) or SAS registry in the first instance. You may also need to seek advice from other teams listed in this section depending on the nature of the planned use of AI. All material developments *(i.e., significant changes to currently agreed norms or practices)* should be reviewed and approved as usual through the agreed academic governance routes.

Why must I seek advice?

- In order to ensure that new practices are ethical, legal and help maintain the highest standards of academic rigour that the University is committed to.

5.3 Undertaking research that may involve or be impacted by AI

Where should I seek advice?

- If you are planning to undertake research that may involve or be impacted by AI, you must seek and follow advice from the research services team (research.ethics@london.ac.uk), and if seeking external funding potentially also from the relevant funder.
- You should also utilise the research ethics policy, guidance and procedures including the research ethics self-evaluation document and any other relevant guidance that may be provided from time to time.

Why must I seek advice?

- Any use of generative AI tools must be accompanied by critical analysis and oversight on the part of the user.
- Generative AI has tremendous potential to enhance, transform and/or disrupt academic work. The potential for innovation and creativity must be balanced by a careful and critical approach applied to any emerging technology.
- Seeking advice will support the responsible, appropriate, and informed use of AI tools and ensure academic and research integrity.

5.4 Using AI in a function that uses Personal Data (data which relates to an identified or identifiable living human being)

Where should I seek advice?

- If you are planning to gather, store, or use personal data you should engage with the Data Protection (DP) team. They will guide you through the necessary steps which may include conducting a Data Protection Impact Assessment (DPIA).
- If you are planning to gather, store or use data relating to characteristics protected under the Equality Act 2010 *(Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex (gender), Sexual orientation)* you may also need to conduct an Equality Impact Assessment.

Why must I seek advice?

- Use of Personal data with AI tools must comply with the requirements of relevant data protection legislation, primarily that of the Data Protection Act 2018 and UK General Data Protection Regulation.
- Risks of using personal data within AI tools involve fair use of personal data, accuracy of data, lack of transparency, appropriate safeguards for sharing personal data internationally, and security of personal data.
- AI currently carries a significant risk of bias in its outputs which can lead to discriminatory impacts.
- Failing to comply with data protection legislation in relation to the use of personal data within AI can result in action by the regulator (primarily the UK's ICO).
- Please see further advice at: Guidance on AI and data protection | ICO

5.5 Confidential business information belonging to UoL or shared with UoL by a third party

Where should I seek advice?

- You should exercise caution and discretion if you wish to enter information which is clearly, or likely, confidential business information belonging to the University, or which has been shared with the University for specific purposes. You should review any NDA or contract terms on confidentiality before taking action and seek advice from the UoL contract owners if in doubt or for University information seek advice from your manager in the first instance. We would not expect advice from professional advisers including tax

advice to be shared on an AI tool. Please note that AI tool in this section refers to a public AI tool and not a closed-circuit purpose built internal-only AI tool.

Why must I seek advice?

- Commercial and reputational risk to us if it is confidential information only pertaining to UoL.
- Further risks include those of a legal claim or compensation where this is confidential information shared under an agreement with a third party.

5.6 Proprietary UoL content (our Intellectual Property) or the content (their intellectual property) of third parties.

Where should I seek advice?

- Content owned by the University of London (our intellectual property) should not be shared without checking the impact on our business and our rights with the UoL department creating, commercialising, or using the UoL content. If in doubt, please check with Legal Services.
- Content that is owned by a third party (their intellectual property) but with whom we have no arrangement for use of sharing into an AI tool should not be shared without checking the contract terms or seeking advice from the UoL contract owner. If necessary we may need to communicate with the content owner. Where content ownership is unclear, check with the UoL contract owner who may refer this to Legal Services. Please note that AI tool in this section refers to a public AI tool and not a closed-circuit purpose built internal-only AI tool.

Why must I seek advice?

- IP risks: Publishing our proprietary content online (whether wholly owned, jointly owned, or licensed from a third party) puts it into the public domain. There is a risk that this action breaches the terms of our agreements with others, such as by facilitating use of the materials by unauthorised users. This can include copying, distributing, or even selling our work without our consent. This in turn may require us to spend resources on managing the situation including issuing take-down notices of the material and engaging in legal processes.
- All of the above carry with them risks of reputational and financial damage to the University.

5.7 Privileged legal advice.

- Privileged and confidential legal advice should not be shared externally including sharing it on an AI tool. Please note that AI tool in this section refers to a public AI tool and not a closed-circuit purpose built internal-only AI tool.

Where should I seek advice?

- You should always seek advice from the Legal Services team before inputting any advice labelled as privileged and confidential into an AI tool.

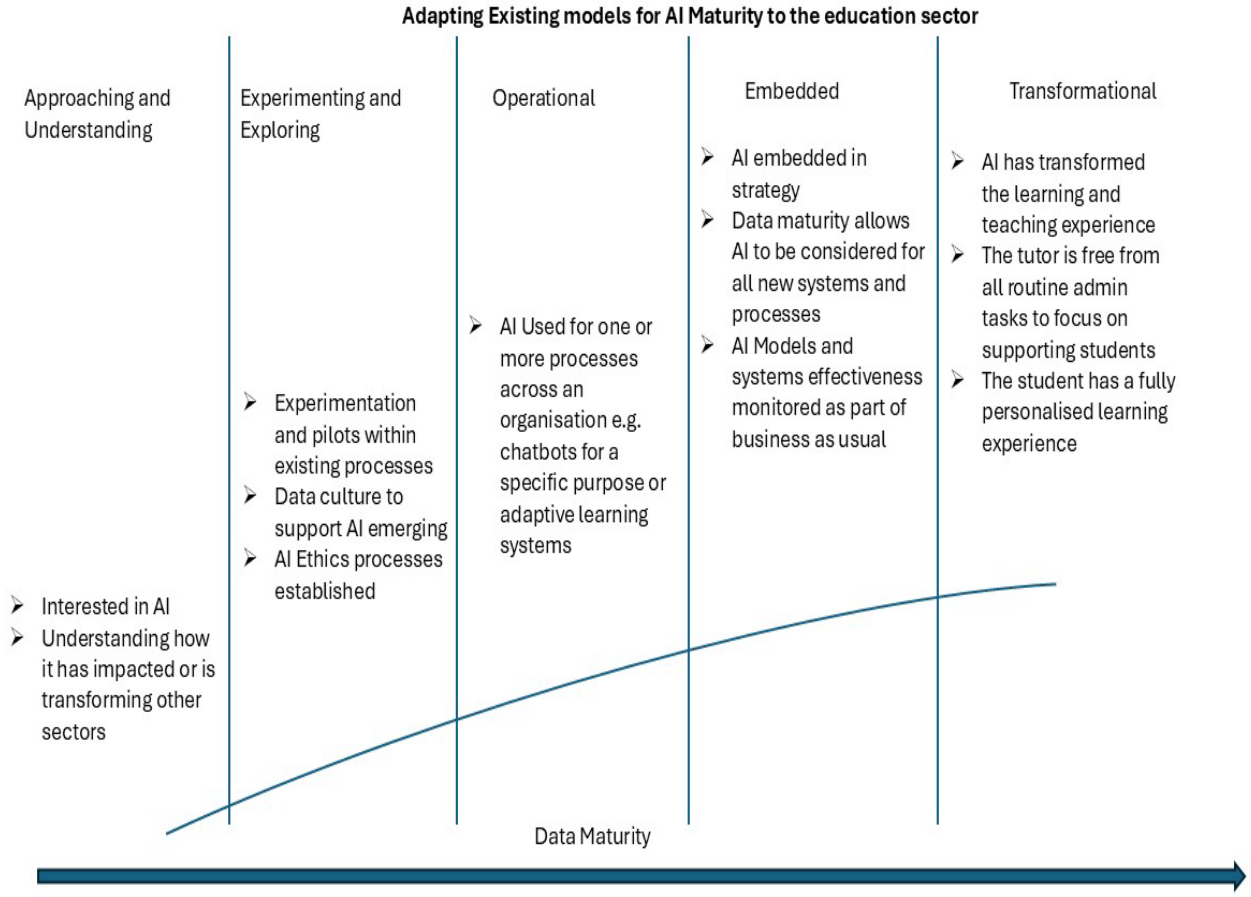
Why must I seek advice?

- Legal advice privilege protects (written or oral) confidential communications between a lawyer and a client for the purpose of giving or receiving legal advice. Legal advice privilege also protects documents which reflect such a communication. This is on the basis that there exists, at the centre of that relationship, an obligation of confidence which the legal adviser owes his client, either in respect of confidential communications passed between them, or in relation to documents which may later form part of that party's 'brief' in adversarial litigation.
- This special protection, enabling a client to retain confidentiality in relation to certain communications, is known as 'legal professional privilege'.

- Disclosing such documents by loading them up to a tool that puts them into the public domain may mean that we lose our privileged protection. It may also potentially put lawyers at risk reputationally or otherwise as this has an impact on them as professionals operating under a regulated body.
- Accordingly, documents containing legal advice from our internal legal team or from our external legal advisors should not be shared on AI tools.

6. How will the University monitor its approach to Artificial intelligence?

The University will use JISC AI maturity model for tertiary education and its supporting tool kits to assess and enhance progress with its adoption of AI in order maximise the benefits of artificial intelligence in support of our strategy, mission and values.



7. Who is responsible for what?

7.1 Board of Trustees – the Board has ultimate responsibility/accountability, which it discharges by:

- receiving assurance from time to time that the University has effective mechanisms in place for the effective and ethical use and management of AI and related developments.
- approving policy and procedure as and when required by regulation or statutory duty.

7.2 Vice-Chancellor's Executive Group –

- approves the University's policy on AI and related developments.
- ensures this policy is implemented effectively across the University.
- makes informed strategic and operational decisions and delegates work in the context of this policy and related developments.
- provides assurance as required to Audit and Risk Committee and the Board of Trustees

7.3 Academic Board

- has oversight of and ensuring that the University's academic policies and procedures ensure academic integrity, research good conduct and robust ethical considerations.
- receives reports on and directs action in relation to opportunities, good practices and any risks arising from the use or misuse of AI.
- receives and considers advice from its sub-committees on how developments in AI are being considered and addressed.

7.4 Staff, functions, or groups/ committees with specific responsibilities have a general responsibility in this area. They are responsible for:

- ensuring they understand engage with this policy and **all** related policies and procedures,
- attending training and development in this area as appropriate; and
- pro-actively considering, addressing, or escalating developments, new practices or issues arising within their areas of responsibility when impacted by AI.
- pro-actively seeking advice and following procedures when engaging with or seeking to develop new activities involving AI.

7.4 All members of our staff have a general responsibility in this area. Staff are responsible for:

- ensuring they understand engage with this policy and **all** related policies and procedures,

8. Useful Resources *(Please note that as this is a rapidly developing area this section will be revised on a regular basis).*

Regulation, development, and controls

- EU AI Act: first regulation on artificial intelligence | Topics | European Parliament (europa.eu)
- AI maturity toolkit for tertiary education - Jisc
- AI and data protection risk toolkit | ICO
- AI Guidance – NCSE
- JUST AI | Ada Lovelace Institute

Research

- How we work in artificial intelligence – UKRI
- https://ukrio.org/ukrio-resources/ai-in-research/
- Living guidelines on the RESPONSIBLE USE OF GENERATIVE AI IN RESEARCH (recommendations for researchers, pp6-7)
- Braid UK - BRAID UK

Education

- Quality Compass: Navigating the complexities of the artificial intelligence era in higher education (qaa.ac.uk)
- Generative Artificial Intelligence (qaa.ac.uk)

Impacts

- https://hbr.org/2024/07/the-uneven-distribution-of-ais-environmental-impacts
- https://www.coe.int/en/web/inclusion-and-antidiscrimination/ai-and-discrimination