

## Policy for the use of Artificial Intelligence

Policy Owner:		Title: Director of Digital Technology Services	
Approved by:		Committee/individual: Information Governance and Cyber Security Oversight Group (IGCSOG)  Date: 30 <sup>th</sup> Jan 2024	
Directorate\team:		Directorate: Digital Technology Services  Team: Digital Architecture  Contact details: Head of Digital Architecture	
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### Policy Statement

The use of Artificial Intelligence has the potential to enhance the productivity of staff and enable efficiencies in the way that people in the University work. As AI based services are becoming widely available and are being integrated into a range of tools available to members of the University it is important that users can use them safely and well.

This policy will be regularly reviewed to ensure it reflects the [growing maturity of the University in its use of AI](#), and as new services become available in the market, to make sure that it remains up-to-date and relevant for the environment the organisation works within. This approach will enable the policy to remain relevant in a fast-changing environment and support the University effectively.

This early version of the policy is intended to enable the University to begin to explore the early use of AI and make use of it while taking account of the risks. It forms part of a collection of related policies covering [student use and academic integrity](#), [research ethics](#) and, in this policy, the use of AI for University activity.

This version of the policy is most relevant to the use of AI as a separate tool assisting users rather than something embedded into business processes or tools. As more integrated uses emerge this policy will be updated. The policy is based on a set of Principles that can be found in Appendix 1. The structure of the principles is shown here.

Objectives	Innovation	Efficiency	Skills
Principles	Conduct	Legality	Fairness
	Accountability	Transparency	Contestability
Underpinning Principles	Security	Sustainability	Knowledge

## Objectives

The policy objectives support the current maturity of the University in using AI.

- The University is able to innovate using Artificial Intelligence to enhance the student experience and/or staff efficiency and productivity and enable research.
- The University can identify opportunities for efficiencies that take advantage of AI tools and are able to realise benefits of adopting the tools.
- University staff develop skills in the use of Artificial Intelligence and can discuss, select and appropriately and confidently use AI based tools and technologies.

## Purposes

The purposes of this policy are:

- To provide guidance to staff on how AI can be used for University activity.
- To provide guidelines and rules that enable staff to safely explore and experiment with AI.
- To enable University staff to choose and use AI based services appropriately and safely.
- To support the University in developing maturity and understanding in the use of AI and related technologies.

## Scope

The policy applies to the procurement, development, deployment, and use of AI across all University activities, including the use of suppliers, contractors and collaborative partnerships.

This policy applies to everyone working for or on behalf of the University including:

- employees of the University,
- members of the Board of Governors and other Committee members,
- employees directly or deemed employed by subsidiary or associated companies,
- employees directly or indirectly employed by overseas offices and branches,
- associate lecturers,
- casual workers employed by the University,
- agency staff working for the University,
- students undertaking work experience placements at the University.

This policy applies to:

- Private AI services owned, developed, or purchased by the University.
- Public AI services whether free or paid for.

## Policy Details

The University has developed and agreed the following guidance.

1) Staff must:

- follow other University policies relevant to the activity being undertaken,
- consider the impact of their use of AI before deciding to develop, procure, deploy or use AI tools,
- undertake responsible procurement where AI tools are being offered,
- obtain ethical approval for research activity,

and staff should:

- take into consideration any relevant codes of practice and sector specific guidance.

Relevant Principle: Conduct

We use AI ethically and responsibly and in line with University policies, procedures, and contracts.

2) Staff must:

- comply with all applicable laws and regulations, including data protection legislation, IP and copyright laws, and the Equality Act,
- not upload any personal data (as defined by GDPR) to public AI services, whether free or paid for,
- not upload any confidential information to public AI services,
- complete data protection impact assessments and equality impact assessments where required,

and staff should:

- be aware of any guidance issued by the University on compliant use of AI,
- be aware that laws may change as this is an area of emerging regulation'
- seek advice from University specialist services where they are unsure of the legal/compliance requirements.

Relevant Principle: Legality

We ensure that our use of AI use is in line with applicable law.

3) Staff must:

- not use AI for decision making unless human supervision is in place,
- not use AI for decision making regarding student and staff recruitment and assessment,

and staff should:

- be mindful of ethical issues related with Equity, Equality, Diversity and Inclusion and where the AI-based solution can have a societal impact.
- conduct equality impact assessments where appropriate and consider the potential impact of AI on all stakeholders and users,

- ensure they have applied an appropriate level of consideration to the benefits, risks, and potential impacts of any deployment of AI,
- endeavour to be aware of the input data and algorithm underpinning the AI, which may result in biased outputs, and attempt to mitigate against this.

**Relevant Principles: Fairness and Contestability**

We will actively work to ensure that our use of AI is fair and reasonable and does not discriminate against individuals or groups on the basis of any protected characteristic.

We ensure that AI is used appropriately and provide routes for stakeholders to ask questions about our use of AI.

**4) Staff must:**

- use AI in ways they are prepared to justify and explain,
- take responsibility for their actions when using AI,
- ensure they have checked that any AI generated content that they are planning to use adheres to this policy and the AI principles,

and staff should:

- seek advice from the University's specialist support services (e.g. DTS, Information Governance, IP, copyright) to inform their decisions to use AI.

**Relevant Principle: Accountability**

The University and its staff endeavour to live up to the expectations of our stakeholders and accept responsibility for our use of AI.

**5) Staff must:**

- be able to provide clear, accurate and meaningful information about the use of AI to explain how (and if necessary, why) it is being used. Where users are required to interact with AI or it is important for fairness, the information should be proactively made available to those users.

And staff should:

- ensure that notices to flag that material has been created by AI are provided so that it is clear where AI has been used in the production or communication of content.

**Relevant Principle: Transparency**

We are open and honest about our use of AI and provide clear, accurate, and meaningful information about how, where, and where necessary why, we use AI. This is not intended to explain why an AI provided specific output.

## Underpinning principles

In addition, while making use of AI, staff should be mindful of:

- Safety and security of University data, and contact specialist University support service, for example Information Governance, DTS, or the Library for advice if unsure.

- Sustainability and climate impact and consider the value of the use of AI for tasks. The impact of the rapid growth in the availability and the use of AI on the environment is hidden from users and many AI providers are consuming increasing amounts of electricity and water to power and cool datacentres.
- The need for staff to retain the knowledge and capability to perform tasks that might be transferred to AI in case tasks need to be brought back to the University.

## Exceptions

The University acknowledges that AI and our maturity of the use of AI is developing and staff may develop ideas and use cases that go beyond the bounds of and challenge the principles of this policy. In these cases, the Deputy Vice Chancellor (Strategy and Operations) shall consider requests for exceptions. Agreed exceptions shall be recorded by DTS and periodically reviewed by the Information Governance and Cyber Security Oversight Group (IGCSOG).

## Roles

- **Information Governance and Cyber Security Oversight Group (IGCSOG)**
  - To consider and approve any amendments to the policy.
  - To monitor the effectiveness and appropriateness of the policy.
  - To approve the AI policy.
- **DVC (Strategy and Operations)**
  - If there is a business case for using AI in a way that would fall outside these principles, the DVC (Strategy & Operations) has responsibility for considering and approving any exceptions.
- **Director of DTS**
  - Reviewing and maintaining the policy.
  - Communication of the AI Policy to staff.
- **Teams and role-holders that provide specialist advice to staff (including Digital Skills Team, IT Security Team, Information Governance Service, IP and Commercialisation Manager, Legal Services) AI Advisory Group or Community of Practice?**
  - To monitor AI related guidance, regulation, and codes of practice in their respective areas.
  - To publish guidance as appropriate.
  - To provide advice to staff on the suitability of tools, effective use of AI, and compliance matters.
- **Directors/Deans of Colleges**
  - To ensure awareness of and compliance with this policy in their respective directorates and colleges.
- **All staff**
  - To comply with the policy requirements and principles.

## Definitions used within the policy

### Artificial Intelligence (AI)

Computer systems or online services able to perform tasks normally requiring human intelligence, such as visual perception, speech recognition, decision-making, and translation between languages.

### Generative Artificial Intelligence

Artificial intelligence capable of generating human-like text, images, or other media, using models trained on existing data.

### **Public AI services**

AI services that are available to users on the public internet whether free or paid for (e.g ChatGPT Plus). These services typically retain data input for further training and may use it in responses to future requests by any user.

### **Private AI services**

AI services that are restricted to particular groups of users, for example members of the University and require access to be granted. These services will protect data from being shared with other users outside the organisation so are safer to use.

### **Confidential information**

Confidential information comprises:

- Commercially sensitive information.
- Information which the University has a contractual obligation to protect and not to disclose.
- Information which could impact on the health and safety of individuals.
- Information which could affect the security of the University's IT network, estate, finances or other assets.
- Information provided in confidence by another organisation/party.
- Information which could negatively impact the University/the reputation of the University.

### **Personal data**

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Pseudonymising is not sufficient to stop datasets being classified as personal data, only full anonymisation (permanent destruction of identifier keys and potential redaction/generalising of any qualitative data) does this.

### **Intellectual property**

All intangible assets in which Intellectual Property Rights exist or can be obtained, including (without limitation) the intellectual creativity that is the basis of inventions, designs (including semiconductor topography), trademarks and service marks, written works, software, musical compositions, recorded media, databases, trade secrets and know-how.

### **Intellectual Property Rights**

Any and all rights (registrable or otherwise, wherever in the world they may apply) pertaining to Intellectual Property where such rights establish, for a party vested with them, a valid basis for legal proceedings against unauthorised users of corresponding Intellectual Property. Intellectual Property Rights shall include (without limitation) patent rights, design rights, semiconductor topography rights, trademark and service mark rights, copyright, database rights, geographical indication rights and plant breeders' rights.

## **Associated Documents**

[Data Protection Guidance](#)

[Data Protection and Freedom of Information section of University website](#)

[Data Protection and AI](#)

[DTS policies](#)

[AI and Research Integrity](#)

[AI and Academic Integrity](#)

[Code of Behaviour](#)

## **References**

[A Maturity Model for AI in Tertiary Education](#)

[Power Hungry Processing](#)

## Appendix 1. OBJECTIVES AND PRINCIPLES FOR STAFF USE OF ARTIFICIAL INTELLIGENCE

Objective	Related Hallam Values	Rationale
<b>Innovation</b>  We encourage the use of AI to innovate and to support our transforming lives agenda.	<b>Innovation</b> We encourage curious minds and creative solutions which can bring positive change in real-world settings.  <b>Ambition</b> We believe that everyone can make an impact and our role is to encourage and inspire each individual to be the best they can be.	<ul style="list-style-type: none"> <li>• We need to ensure that staff are able to experiment and innovate.</li> <li>• The University should be able to take advantage of the opportunities that AI may offer and use AI to drive improvements in the workplace support our Transforming Lives agenda.</li> <li>• As a Higher Education Institution and research active university, we need to be forward-looking, embrace opportunities, and reflect our Hallam Values of Innovation and Ambition in our approach to AI.</li> <li>• There is a risk that the University may get 'left behind' or miss opportunities by not being sufficiently ambitious or innovative.</li> <li>• It is difficult to understand the risks and issues if we do not experiment and explore and are just looking at AI at theoretical level.</li> </ul>
<b>Efficiency</b>  We use AI to improve working practices and processes to improve productivity and gain efficiencies.	<b>Innovation</b> We encourage curious minds and creative solutions which can bring positive change in real-world settings.	<ul style="list-style-type: none"> <li>• Being able to work more efficiently through the careful adoption of AI tools will enable staff to focus on higher value, more engaging work by reducing the amount of repetitive or lower value work that is done.</li> <li>• More efficient ways of working with support from technology will contribute to financial sustainability objectives and our accountability for the use of public funds.</li> <li>• Efficient ways of working will improve the student and staff experience.</li> </ul>
<b>Skills</b>  We encourage and support staff to develop their skills to assist them in engaging with AI tools and the opportunities that they offer.	<b>Ambition</b> We believe that everyone can make an impact and our role is to encourage and inspire each individual to be the best they can be.  <b>Innovation</b> We encourage curious minds and creative	<ul style="list-style-type: none"> <li>• Continuous development of AI related skills and literacy will support and enable staff to engage with and work with AI safely and confidently.</li> <li>• Upskilling staff will enable innovation and collaboration.</li> <li>• There is a risk that staff will not be able to make informed decisions about their use of or deployment of AI if they lack knowledge and awareness of the technology and associated terminology.</li> <li>• There is a risk that staff will not be able to bid for contracts and funding, participate in sector discussions and initiatives, or join collaborative projects with other organisations if they lack the necessary skills, knowledge, and awareness of AI.</li> </ul>



	<p>solutions which can bring positive change in real-world settings.</p> <p><b>Collaboration</b> We nurture a supportive culture where working together is a part of everyday learning and problem-solving.</p>		
Principle	Related Hallam Values	Rationale	Implications
<p><b>Conduct</b></p> <p>We use AI ethically and responsibly and in line with University policies, procedures, and contracts.</p>	<p><b>Integrity</b> We cultivate an environment of openness, authenticity, and compassion where everyone can thrive.</p>	<ul style="list-style-type: none"> <li>• To maintain the University's reputation</li> <li>• To minimise risk</li> <li>• To ensure that outputs can be used safely.</li> <li>• To ensure that our stakeholders and members of the public have confidence in the University.</li> <li>• To uphold ethics and integrity</li> <li>• To stand up to scrutiny by the public and by professional bodies and regulators.</li> <li>• Staff must operate within the terms of their employment contract.</li> <li>• There may be sector-specific codes of practice that staff should take into account for particular activities.</li> </ul>	<p>Staff must:</p> <ul style="list-style-type: none"> <li>• follow the AI and other related University policies.</li> <li>• take responsibility for their use of AI.</li> <li>• operate within their employment contract.</li> <li>• consider the impact of their use of AI before deciding to develop, use, procure, or deploy AI tools.</li> <li>• undertake responsible procurement.</li> <li>• obtain ethical approval where required.</li> </ul> <p>Staff should:</p> <ul style="list-style-type: none"> <li>• take into consideration any relevant codes of practice and sector specific guidance.</li> </ul>
<p><b>Legality</b></p> <p>We ensure that our use of AI use is in line with applicable law.</p>	<p><b>Integrity</b> We cultivate an environment of openness, authenticity, and compassion where everyone can thrive.</p> <p><b>Inclusion</b> We speak up for equality and diversity so that every</p>	<ul style="list-style-type: none"> <li>• To ensure legal compliance</li> <li>• The University has a low-risk appetite for legal compliance/is risk averse in relation to legal compliance.</li> <li>• To reduce the risk of legal challenge, fines, enforcement activity</li> <li>• To reduce the risk of reputational damage</li> <li>• Laws in other countries/jurisdictions may apply if our AI activity falls within their scope.</li> <li>• Each country/region is currently developing or considering its regulatory approach to AI and</li> </ul>	<p>Staff must:</p> <ul style="list-style-type: none"> <li>• comply with all applicable laws and regulations, including data protection legislation, IP and copyright laws, the Equality Act.</li> <li>• not upload any personal data (as defined by GDPR) to public AI systems, whether free or paid for</li> <li>• not upload any confidential information to open AI systems;</li> </ul>

	single person can feel they belong in our community.	<p>these laws will be subject to updates and may not be consistent.</p> <ul style="list-style-type: none"> <li>• There may be sector-specific laws and regulations.</li> <li>• UK applicable laws include: <ul style="list-style-type: none"> <li>– Data protection law (UK GDPR and Data Protection Act 2018) – includes the requirement to comply with data protection principles and conduct DPIAs where required.</li> <li>– IP law</li> <li>– Copyright law</li> <li>– Equality Act</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Complete data protection impact assessments and equality impact assessments where required.</li> </ul> <p>Staff should:</p> <ul style="list-style-type: none"> <li>• be aware of any guidance issued by the University on compliant use of AI,</li> <li>• be aware that laws may change as this is an area of emerging regulation'</li> <li>• Seek advice from University specialist services where they are unsure of the legal/compliance requirements.</li> </ul>
<p><b>Fairness</b></p> <p>We will actively work to ensure that our use of AI is fair and reasonable and does not discriminate against individuals or groups on the basis of any protected characteristic.</p>	<p><b>Inclusion</b></p> <p>We speak up for equality and diversity so that every single person can feel they belong in our community.</p> <p><b>Collaboration</b></p> <p>We nurture a supportive culture where working together is a part of everyday learning and problem-solving.</p>	<ul style="list-style-type: none"> <li>• AI output cannot be assumed to be free from bias and needs to be reviewed to ensure it does not discriminate against groups or individuals.</li> <li>• Our commitment to diversity, fairness and against conscious &amp; unconscious bias need to be reflected in and supported by use of AI tools and technologies.</li> <li>• Use of AI should be appropriate and proportionate to the task and aim for equitable outcomes.</li> </ul>	<p>Staff must not:</p> <ul style="list-style-type: none"> <li>• use AI for decision making unless human supervision is in place.</li> <li>• use AI for decision making regarding student and staff recruitment and assessment.</li> </ul> <p>Staff should:</p> <ul style="list-style-type: none"> <li>• be mindful of ethical issues related with Equity, Equality, Diversity and Inclusion and where the AI-based solution can have a societal impact.</li> <li>• ensure they have applied an appropriate level of consideration to the benefits, risks, and potential impacts of any deployment of AI and conduct equality impact assessments where appropriate.</li> <li>• endeavour to understand the input data and algorithm underpinning the AI, which may result in biased outputs, and attempt to mitigate against this.</li> </ul>
<p><b>Accountability</b></p> <p>The University and its staff endeavour</p>	<p><b>Integrity</b></p> <p>We cultivate an environment of openness, authenticity, and</p>	<ul style="list-style-type: none"> <li>• Legal responsibility for the use of AI rests with the University. The University will support the use of AI and take responsibility for the outcomes as long as policies are followed.</li> </ul>	<p>Staff must</p> <ul style="list-style-type: none"> <li>• use AI in ways they are prepared to justify and explain.</li> </ul>

to live up to the expectations of our stakeholders and accept responsibility for our use of AI.	compassion where everyone can thrive.	<ul style="list-style-type: none"> <li>Staff should be prepared to stand by their decision to use AI and the results and ensure they have the appropriate knowledge and skills.</li> <li>If something goes wrong, we will communicate honestly with stakeholders and learn lessons for the future.</li> <li>Staff misconduct routes should be followed if policies are not adhered to.</li> </ul>	<ul style="list-style-type: none"> <li>take responsibility for their actions when using AI.</li> <li>ensure they have checked that any AI generated content that they are planning to use adheres to this policy and the AI principles.</li> </ul> <p>Staff should</p> <ul style="list-style-type: none"> <li>seek advice from the University's specialist support services (e.g. DTS, IG, IP, copyright) to inform their decisions to use AI.</li> </ul>
<b>Transparency</b>  We are open and honest about our use of AI and provide clear, accurate, and meaningful information about how, where, and where necessary why, we use AI.	<b>Integrity</b> We cultivate an environment of openness, authenticity, and compassion where everyone can thrive.	<ul style="list-style-type: none"> <li>To ensure that individuals know when and why they are interacting with AI or AI generated content.</li> <li>To allow individuals to make informed decisions about information from the University.</li> <li>To promote public and stakeholder trust and confidence in University services and information</li> <li>To minimise consequences of inaccurate output from AI tools</li> <li>To promote awareness of the use and benefits of AI tools in the University</li> </ul>	<p>Staff must</p> <ul style="list-style-type: none"> <li>Be able to provide clear, accurate and meaningful information about the use of AI to explain how (and if necessary why) it is being used. Where users are required to interact with AI or it is important for fairness, the information should be proactively made available to those users.</li> </ul> <p>Staff should</p> <ul style="list-style-type: none"> <li>Ensure that notices to flag that material has been created by AI are provided so that it is clear where AI has been used in the production or communication of content.</li> <li>Note that this is not intended to explain why an AI provided specific output.</li> </ul>
<b>Contestability</b>  We ensure that AI is used appropriately and provide routes for stakeholders to ask questions about our use of AI.	<b>Integrity</b> We cultivate an environment of openness, authenticity, and compassion where everyone can thrive.  <b>Ambition</b> We believe that everyone can make an impact and our role is to encourage and	<ul style="list-style-type: none"> <li>AI will be new to many staff and many of our students and other stakeholders who may have questions about our use of AI.</li> <li>Innovation and experimentation will benefit from opportunities for challenge, review, and learning lessons.</li> <li>The technology and our understanding of it are developing, as is the regulatory landscape and the use of AI will need to be revisited as the technology and law changes.</li> </ul>	<p>Staff must not:</p> <ul style="list-style-type: none"> <li>use AI for making automated decisions about humans.</li> <li>use AI for decision making regarding student and staff recruitment and assessment.</li> <li>use AI for decision making unless human supervision is in place.</li> </ul>

	inspire each individual to be the best they can be.	<ul style="list-style-type: none"> <li>We should be open to challenge of whether particular use of AI is an appropriate solution or could be improved as our maturity in using the technology improves.</li> </ul>	
Principle	Related Hallam Values	Implications	
<b>Safety/Security of University Data</b>	Underpins other principles and values	<ul style="list-style-type: none"> <li>Staff must follow relevant policies and procedures, particularly those relating to IT security, data protection and IP.</li> <li>Staff should seek advice from the University's specialist support services (e.g. DTS, IG, IP, copyright) to inform their decisions to use AI.</li> </ul>	
<b>Sustainability</b>	Underpins other principles and values	<ul style="list-style-type: none"> <li>Staff should take into consideration the environmental impact of the use of AI models and the University's ambitions and objectives for net zero.</li> </ul>	
<b>Knowledge</b>	Underpins other principles and values	<ul style="list-style-type: none"> <li>The need for staff to retain the knowledge and capability to perform tasks that might be transferred to AI.</li> <li>Staff should use AI to develop capability and experience alongside any productivity benefits and be willing to share and improve their practice.</li> </ul>	