ARTIFICIAL INTELLIGENCE POLICY

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Summary

What is this document about?

This Policy defines the University's expectations for the responsible, transparent and ethical use of Artificial Intelligence (AI). It provides the foundation upon which all staff and student guidance is developed and ensures a consistent institutional standard.

Who is this for?

This Policy applies to all staff, students and other users of University IT systems and technology, services and data.

How does the University check this is followed?

Subject to UK legislation, AI-related activity within University systems may be monitored lawfully and proportionately to ensure compliance and maintain security.

Monitoring will take place within the terms permitted under the Regulation of Investigatory Powers Act (RIPA) 2000 and The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations) 2000 and the Investigatory Powers Act 2016.

Who can you contact if you have any queries about this document?

Any questions or concerns relating to the terms or implementation details associated with this Policy should be addressed to the Corporate Governance Team.

Executive summary

This Policy establishes the University's position on the use of AI. It exists to support and enable staff and students to use AI confidently and appropriately, while meeting statutory and regulatory obligations, upholding academic integrity, and protecting personal data and University services. It also helps the University realise the benefits of AI by setting clear expectations and safeguards.

1. Purpose

Artificial Intelligence is increasingly shaping how universities create knowledge, deliver education, and operate their core services. The University of Portsmouth recognises both the opportunities and the responsibilities associated with the use of AI. This Policy establishes a clear institutional framework within which staff and students can engage with AI confidently and appropriately. It sets out mandatory requirements, particularly for staff, to ensure that AI is used in a manner that is lawful, ethical and transparent, protects academic integrity, personal data and University services, and mitigates institutional risk. The Policy also provides a consistent foundation for guidance, decision-making and future development, enabling the responsible adoption of AI in alignment with the University's mission, values, and statutory and regulatory obligations.

The policy aims to:

a) establish clear requirements for the ethical, safe and responsible use of AI;
b) set out consistent principles governing the use of AI in teaching, learning, research and University operations;
c) define responsibilities and acceptable standards of conduct for staff and students when using AI;
d) safeguard personal data, academic integrity, fairness and wellbeing, and protect University systems and services;
e) provide a stable institutional foundation to support innovation, digital capability and the future development of AI-enabled activity across the University.

2. Scope

This Policy applies to all forms of AI, including but not limited to generative AI, large language models, machine learning systems, decision-support tools, automation technologies and AI functionalities embedded in enterprise platforms. It applies to the use of AI in the pursuit of any aspect of University business including the use of AI in the processing or use of University data or intellectual property.

For the purposes of this Policy, Artificial Intelligence (AI) refers to current computer-based systems designed to perform specific tasks that would otherwise require human intelligence, including generative AI tools. The Policy does not assume the existence of artificial general intelligence. This position will be reviewed as technologies, risks and regulatory requirements evolve.

3. Applicability

This Policy applies to all staff, students, governors, contractors, suppliers and other third parties who access or use University of Portsmouth systems, services or data. All those within scope are responsible for ensuring that their use of AI complies with this Policy and with related University policies, including those covering data protection, information security, academic integrity, research ethics and acceptable use. Where the policy says "must", the provisions are mandatory for every person who is in scope.

This Policy provides the overarching institutional framework for the use of AI across the University. Where additional policies, frameworks or guidance apply in specific contexts, such as assessment, research, professional practice or disciplinary requirements, those local provisions operate within, and must be consistent with, this Policy. This Policy supersedes any general guidance previously published by the University on the use of generative AI.

4. Definitions

The University adopts the following high-level definitions to ensure clarity and consistency in the use of forms of AI:

4.1 Artificial Intelligence (AI)

Artificial Intelligence (AI) refers to computer-based systems that carry out specific tasks which would normally require human judgement or intelligence. These tasks can include recognising patterns, understanding or generating language, making predictions, or supporting decisions. For the purposes of this Policy, AI refers to current task-specific systems (sometimes referred to as "narrow AI") and does not assume the existence of artificial general intelligence.

4.2 Generative AI

Generative AI is a type of AI that creates new content, such as text, images, audio, video or computer code, based on patterns learned from existing data. While these tools can be helpful, they may also produce information that is inaccurate, misleading, incomplete or biased, and therefore require careful human review before use.

4.3 Large Language Models (LLMS)

Large Language Models (LLMs) are a form of generative AI designed to work with written language. They can be used to summarise, translate, re-phrase, analyse or draft text. However, LLMs may produce confident-sounding but incorrect information and can reflect bias or outdated material.

4.4 Machine Learning (ML)

Machine Learning is a technique used within AI systems that allows them to improve their performance by learning from data rather than being explicitly programmed for every task. This Policy refers to machine learning only where it forms part of an AI system in use.

4.5 Embedded AI tools

Many digital tools and services used by the University include AI features as part of their standard functionality. These embedded AI tools may operate automatically or in the background within commonly used systems such as office software, learning platforms, research tools or administrative systems. Users must be aware when AI features are being used, understand the implications for data protection and privacy, and ensure that use of such tools complies with this Policy.

4.6 Emerging AI tools

Emerging AI tools are new or developing technologies whose capabilities, limitations and risks may not yet be fully understood. The use of such tools requires particular caution and may be subject to additional governance, approval or risk assessment under this Policy.

4.7 AI Council

The AI Council acts as the University's overarching AI assurance body, providing a coordinated view of AI-related opportunity, risk, ethics and governance across the institution. It oversees the effectiveness of AI governance arrangements, ensuring that risks and opportunities are appropriately owned and managed through existing academic, research, operational and corporate governance structures and advises UEB where gaps, conflicts or emerging issues require institutional action.

5. Principles for responsible AI use

The University adopts the following principles to establish a clear, consistent and responsible foundation for the use of AI across teaching, learning, research, operations and professional practice. These principles are intended to support informed and confident engagement with AI, while safeguarding individuals, the institution, and wider societal interests. Where appropriate, brief examples are included to illustrate how the principles may be applied in practice.

5.1 Human-centred use

AI must support, not replace, human judgement. Staff and students remain accountable for all decisions, outputs and academic or professional work generated with the support of AI. *For example, AI may assist with drafting or analysis, but responsibility for the final content, conclusions or decisions always rests with the individual*

5.2 Transparency and openness

AI use must be declared clearly and honestly. Individuals are responsible for ensuring that others understand when, how and to what extent AI has contributed to their work, decisions or processes. Disclosure should be proportionate to the context and purpose of the work, recognising that appropriate acknowledgement will differ, for example, between assessed student work, research outputs, professional documentation, and routine administrative or communications tasks. *For example, where AI has been used to support assessment, research outputs or formal professional documentation, this contribution should be disclosed in line with relevant guidance.*

5.3 Ethical and responsible practices

AI must be used in ways that are ethical, lawful and aligned with the University's values. This includes avoiding harm, discrimination, bias, misleading outputs or practices that compromise integrity. *For example, AI tools should not be used to generate or reinforce discriminatory content or to circumvent established ethical safeguards.*

5.4 Fairness, equity and inclusion

AI tools must be used in ways that promote fairness, mitigate bias and support inclusive education, research and services, in line with the University's values and commitment to equality, diversity and inclusion. The adoption and use of AI must take account of differences in access, digital confidence and support, and should not create avoidable or unjustified disadvantage for members of the University community. *For example, the use of AI in teaching or assessment should be designed with due regard to students' access to tools and support, and accompanied by appropriate alternatives, guidance or adjustments where needed.*

5.5 Critical engagement and accuracy

AI outputs must always be critically evaluated. Users must verify accuracy, avoid over-reliance, and remain alert to limitations such as hallucinations, outdated training data and implicit bias. Responsible use also includes recognising when AI is not appropriate, particularly where learning, skill development or professional judgement is the primary objective. *For example, reliance on AI to complete formative learning tasks or develop core professional skills may undermine learning outcomes rather than support them.*

5.6 Accountability and oversight

Meaningful human oversight must be maintained in all contexts where AI is used. Automated decision-making must not be used for decisions that significantly affect individuals without approved governance, appropriate safeguards and review.

Where the use of AI involves the processing of personal data or is likely to result in high-risk processing, a Data Protection Impact Assessment (DPIA) must be completed in accordance with data protection legislation and relevant guidance before such use is approved or implemented. *For example, AI-supported tools may inform, but must not replace, human decisions relating to progression, assessment outcomes, recruitment or disciplinary action.*

5.7 Data protection and security

AI use must comply with data protection legislation and relevant University policies. Personal, confidential or sensitive information may only be processed using approved AI tools that meet University security, privacy and governance requirements, as defined in the University's data protection, information security and records management policies and associated guidance. *For example, personal data must not be entered into public or unapproved AI platforms.*

5.8 Academic integrity

AI must be used in a way that upholds academic integrity. The use of AI does not override existing requirements relating to authorship, intellectual property, publication, attribution or plagiarism, all of which continue to apply. Users must not misrepresent AI-generated content as their own work, and assessment design must support verification of authorship. *For example, AI-assisted content that is submitted without appropriate attribution may constitute academic misconduct.*

5.9 Research ethics and professional standards

AI-supported research and professional practice must be transparent, methodologically robust and compliant with ethical review processes, disciplinary norms, data governance requirements and funder or regulator expectations. Researchers and professionals must document and justify how AI has contributed to their work. *For example, the use of AI in data analysis or interpretation should be clearly described and justified within research methodologies.*

5.10 Continuous improvement and adaptation

The University will monitor, evaluate and adapt its approach to AI in response to emerging developments, risks, opportunities and legislation.

5.11 Environmental responsibility

AI adoption must take account of environmental sustainability and the University's sustainability commitments. The use of AI should be proportionate and necessary, avoiding excessive or unnecessary computational activity where simpler or lower-impact alternatives are sufficient. *For example, AI should not be used where a conventional search or manual process would meet the same need with lower environmental impact*.

6. Examples of acceptable and unacceptable AI use

This section provides practical examples that illustrate how the University's principles of responsible AI use should be applied in day-to-day academic, research and professional services activity. These examples are not exhaustive but provide guidance on where AI use is appropriate, where caution is required, and where use is prohibited.

6.1 Acceptable Use

Acceptable uses of AI include activities that support learning, research, productivity or accessibility without compromising integrity, privacy or compliance. Examples include:

- Using AI to generate ideas, drafts or structured outlines to support thinking.
- Using AI to generate appropriate images, music or sound or other digital assets.
- Using AI to summarise complex concepts for personal understanding.
- Enhancing accessibility through AI enabled tools (e.g., captioning, text-to-speech, simplification tools).
- Using AI for formative feedback or reflective support, where permitted by assessment guidance.
- Using AI supported research tools for coding, modelling, transcription, or initial data exploration with full documentation and transparency.
- Employing AI to support literature searches, thematic analysis or structuring methodologies.
- Using approved AI tools that comply with ethical review, data governance and funder requirements.
- Drafting emails, reports or communications using AI as a productivity aid, provided outputs are appropriately reviewed by a human.
- Using AI in administrative tools (e.g., scheduling support, automated insights) where they are embedded into approved systems.
- Employing AI powered cybersecurity or analytics tools governed by institutional approval.

6.2 Unacceptable use

The following uses of AI contravene the principles of responsible use and are therefore prohibited as they compromise academic integrity, data security, fairness or legal compliance:

- Submitting AI generated content as original student work.
- Using AI to generate entire assessments or submissions.
- Circumventing assessment requirements or misrepresenting AI assisted work as independent effort.
- Uploading identifiable student work, research data or confidential University information to public or unapproved AI tools or using personal AI software subscriptions to perform work tasks for the University.
- Using AI systems that store, process or transfer data outside University-approved environments - meaning systems or platforms that have not been assessed and approved under the University's information security and data governance arrangements.
- Using AI detection tools, which are unreliable and may produce discriminatory or inaccurate outcomes.
- Using AI to influence decisions that significantly affect individuals (e.g., grading, selection, appeals, HR decisions) without appropriate human oversight.
- Deploying AI in ways that introduce bias, discrimination or harm.
- Allowing AI to operate autonomously in significant decision making without institutional approval.

- Using AI in any way that compromises the integrity, reliability or continuity of university operations, services or decision-making processes.

6.3 Use requiring caution and due diligence

Certain uses of AI require consultation with relevant teams (e.g. LIS Information Security, Corporate Governance, the Department of Research & Innovation, or Research Ethics) because they involve higher-risk scenarios, including risks to individuals, the University, or its compliance with legal, regulatory or ethical obligations. These include, but are not limited to:

- Using AI systems to input, upload, analyse, process or otherwise enable access to data that could identify a living individual (including personal data and special category data as defined in data protection legislation), or to other sensitive information such as commercially confidential material, intellectual property or unpublished research data. Such use should be referred for appropriate information governance and data protection review before proceeding
- Using AI in assessment design, or to modify assessment modes, marking approaches or progression decisions.
- Testing, piloting or adopting new AI systems or third-party tools that have not yet been assessed or approved by the University, including any use that may involve access to University data, systems or environments. Such activity should be discussed with the area's IT Business Partner in the first instance to determine the appropriate assessment, approval and implementation route
- Using AI-driven or automated decision-making systems that could influence the student journey, staff recruitment or HR decisions, or the eligibility, availability or prioritisation of University services

6.4 Roles and responsibilities

The following roles ensure effective governance and responsible adoption of AI across the University:

6.5 Staff

Staff are responsible for:

- Using AI in a responsible, transparent and lawful manner, in compliance with this Policy and related University policies.
- Completing required training or development activities related to the use of AI, where mandated for specific tools, roles or activities.
- Exercising professional judgement and remaining accountable for all work, decisions and outputs that are supported by AI, ensuring that academic integrity, data protection and professional standards are upheld.
- Using AI proactively and appropriately to enhance efficiency, quality and effectiveness within their role, where supported by approved tools and guidance.
- Supporting students and colleagues to understand responsible AI use, including setting clear expectations and modelling good practice.
- Seeking advice or approval before using AI in higher-risk contexts and refraining from use where it is prohibited or where required safeguards are not in place.

6.6 Students

Students are expected to:

- Use AI ethically, in compliance with this Policy and in line with assessment requirements.
- Acknowledge all use of AI, and any contribution it has made, in academic work in accordance with University and programme-level guidance.

- Seek clarification where the use of AI is unclear, restricted or prohibited.

6.7 University Executive Board (UEB)

- Provides strategic oversight of AI use across the institution.
- Approves the AI Policy and major changes to AI related governance.
- Ensures AI use aligns with institutional mission, values and legal obligations.
- Appoints the AI Council.

6.8 AI Council

- Advises UEB on emerging AI risks, opportunities and institutional readiness.
- Oversees implementation of the Policy and development of supporting guidance.
- Coordinates cross University activity on AI governance, training and standards.

6.9 Digital Board and Library & Information Services

- Maintains the University's digital and architectural standards relating to AI enabled systems.
- Oversees the procurement, technical design and assurance of AI enabled solutions.
- Ensures AI deployments align with enterprise architecture, interoperability requirements and long-term sustainability.
- Evaluates AI-related security, privacy and technical risks and provides assurance and advice to inform approval and decision-making by the appropriate business owner or University governance body
- Provides guidance on safe use of AI systems.

6.10 Corporate Governance

- Maintains the official record and version control of the AI Policy.
- Leads on formal policy review cycles and ensures appropriate approval routes.
- Provides guidance on compliance, documentation and interpretation.
- Ensures compliance with data protection legislation when AI tools process personal data.
- Supports Data Protection Impact Assessments (DPIAs) for AI-supported activities.

6.11 Academic Registry and CADI

- Supports integration of AI expectations into assessment policy and academic governance.
- Provides guidance on academic integrity and appropriate use of AI in learning and teaching.

6.12 Department for Research & Innovation

- Advises on responsible use of AI within research practices, funding and ethics.
- Provides guidance on academic integrity and appropriate use of AI in research and innovation activities.

6.13 Human Resources

- Ensures staff have access to appropriate training, development and support to build the skills, knowledge and confidence required to use AI responsibly, working in collaboration with Library & Information Services, academic schools and other relevant teams.
- Supports capability-building through training, professional development and recruitment.

- Works with Digital Board, AI Council and LIS to identify emerging skills needs.

6.14 Faculties, Schools & Professional Services

- Implement the Policy within local contexts.
- Provide discipline specific guidance and ensure staff awareness.
- Support students and colleagues in understanding responsible AI use.

7. Violations and enforcement

Violations of this policy may result in formal disciplinary action, removal of access rights, or referral to legal authorities, as appropriate. Suspected misuse of AI or information security incidents arising from the use of AI must be reported immediately to the university's **IT Service Desk** (extension 8888) and / or the **Information Security Team**.

8. Policy Review

This Artificial Intelligence Policy is a controlled document and is subject to regular review to ensure continued relevance, legal compliance, and alignment with the university's operational needs and information security requirements.