ARTIFICIAL INTELLIGENCE POLICY AND PROCEDURE

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Policy Lead	Academic Dean
Approving Authority	Board of Directors
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Relevant legislation or external requirements	National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) (NC: 2.1.8, 3.3, 6.1, 6.3, 6.4, 8.5, 8.8, 8.22,) Higher Education Standards Framework (Threshold Standards) 2021 (HESFs: 2.1.2, 2.1.3, 2.4, 3.3, 5.2, 5.3.7, 6.3.2d-g, 7.2.2) Australian Privacy Principles Privacy and Personal Information Protection Act 1998 (NSW) (PPIP Act) Privacy and Personal Information Protection Regulation 2014 (2014-549) Privacy Code of Practice (General) 2003 (NSW)
Related ASA Documents	Cyber Security Framework Student Assessment Policy Student Assessment Procedure Academic Integrity Policy Academic Integrity Procedure Information Technology Policy and Procedure Privacy Policy and Procedure

1. Purpose

This document outlines the responsible and beneficial use of Artificial Intelligence (**AI**) at the ASA Institute of Higher Education (**ASA**). AI offers numerous educational opportunities, and this policy and procedure aims to guide its integration in ways that enhance learning while upholding ethical standards, student welfare, and the authenticity of assessment. This policy makes clear the extent and acceptable use of AI for all stakeholders, students, academic, and non-academic staff.

While Generative AI (**GenAI**) presents considerable issues as regards academic integrity, specifically when used to circumvent the learning process by illegitimate content creation, it can also be used ethically and productively to complement and enhance many aspects of the learning process. Staff and students should be instructed on the benefits and limitations of AI tools and, more specifically, students should be provided the pathways required to develop the skills necessary to work with AI technology in a safe and ethical manner. By introducing emerging technologies, including GenAI, into our suite of courses and routine organisational practices, and embedding it with best practice as regards academic integrity, ASA seeks to ensure that our students will be workplace relevant for the future, with accompanying values and ethical consideration.

2. Scope

This document applies to all ASA applicants, students, staff, directors, officers, external appointees on any ASA board or committee, volunteers, and contractors.

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3. Principles

This Policy is based on the following principles supported by the NSW Government Artificial Intelligence Ethics Policy, the Australian Framework for Generative AI in Schools, and the International Center for Academic Integrity:

- **Teaching and Learning** - Generative AI tools are used to support and enhance teaching and learning.
- **Honesty** - It is critical that individuals are honest about what is their own work and what is not. This means that use of GenAI should be acknowledged and made transparent.
- **Trust** - GenAI is known to 'hallucinate' and is not credible as a source. While it can produce accurate outputs that are useful in a variety of ways, we cannot automatically trust that the content it provides us is reliable. This means that we need to critically analyse outputs from GenAI before using them.
- **Fairness** - To ensure fairness (at the classroom, programme, discipline, and/or institute level), clear guidelines for how and when AI technology can and cannot be used (for both students and staff) should be available and applied consistently.
- **Respect** - Respect for the learning process means that GenAI tools are not used in any way that bypasses intended learning, only in ways that enhance it. We respect our own potential by placing value in developing new knowledge and skills and recognising and taking pride in our own contributions. We respect others by being honest and transparent about our use of GenAI.
- **Responsibility** - Individuals are responsible for the work they produce. This means that individuals using AI-generated content need to analyse it to ensure that it is accurate and unbiased. This is one of several ways AI and human-generated content differ; AI cannot take responsibility for what it produces. Critically engaging with AI tools, rather than accepting all content produced by them as accurate, encourages learning and maintains the credibility of the individual producing the work.
- **Courage** - It takes courage to learn how to use new and unfamiliar technologies, and to persevere in the ethical use of AI tools, staying true to the values of academic integrity, rather than taking shortcuts that may be easier but that bypass vital learning.
- **Privacy, Security and Safety** - Students and others using generative AI tools have their privacy and data protected.

The principles underpin all aspects of the intersection of Artificial Intelligence throughout the academic and operational aspects of ASA. These principles correspond and correlate directly with our overarching academic integrity principles, and are reflective of our commitment as an education provider of merit.

4. Definitions

Term	Definition
artificial intelligence (AI)	Artificial intelligence refers to the ability of systems or computers to do things that would normally require human intelligence. AI is used in many products and services we use daily, from search engines to smartphone assistance.
data	Data is raw, individual facts that need to be processed. When data is processed, combined with other data, organised, structured or presented in a given context, it is referred to as information.

Term	Definition
device	Device refers to any electronic equipment that is able to connect to the internet and complete teaching and learning activities. Devices include laptops, tablets and notebooks. Whilst mobile phones can perform some tasks, they do not meet the minimum requirements for study use.
generative artificial intelligence (GenAI)	GenAI can understand instructions and produce or deliver meaningful content. It uses the data it was trained on to generate new data that has similar characteristics. Generative AI products are widely available, and they are expected to keep changing and improving quickly. Currently, the most popular generative AI tool is ChatGPT.
hallucination	Incorrect or misleading results that AI models generate. These errors can be caused by a variety of factors, including insufficient training data, incorrect assumptions made by the model, or biases in the data used to train the model.
Learning Technologies	Digital systems and tools enabling learning and teaching.
Unsupported Technologies	All online and mobile technologies including software, hardware and networks which allow user participation and interaction, which are not supported by ASA's information technology provisions.

5. Policy Statement

Artificial Intelligence (AI) presents a wealth of opportunities balanced against risks for society, particularly in the workplace. ASA acknowledges the importance of adopting AI as a valuable and innovative tool in assisting it to deliver its strategies, albeit in a safe and responsible manner. At ASA, with our focus on continuous improvement, as well as our focus on keeping our graduates industry relevant, we have embraced AI into our BAU. The following indicates the usage of AI at ASA, with policy and operational implications.

5.1 Learning and Operational Functions

At ASA, AI may be used to support a number of teaching, learning and operational functions and activities, including but not limited to:

- making operations more efficient and consistent
- protecting ASA resources
- highlighting potential cheating and academic integrity concerns
- providing appropriate feedback to students
- identifying at-risk and high-achieving students to improve learning outcomes and provide additional support
- engaging in student support activities
- improving the quality of student and staff experiences
- identification of study pathways towards identified career goals
- streamlining of campus facilities and operations
- marketing activities such as personalisation, and
- improving speed and agility to identify issues, opportunities or improve organisational responses.

5.2 AI use with students

The purpose of integrating AI into student learning is to enhance educational experiences, foster critical thinking, and prepare students for the digital age. AI tools can empower teachers to become facilitators of learning in innovative ways.

AI should be used judiciously, enhancing education without diminishing the value of human interaction. AI should complement traditional teaching methods and not replace essential teaching roles. Responsible use of AI with students entails providing appropriate guidance, educating students about AI's limitations and benefits, and fostering critical thinking skills to evaluate AI-generated outputs. The following conditions must be satisfied for AI to be used with students:

- AI tools must align with the planned curriculum and support student learning.
- The use of AI must ensure student privacy and comply with data and child protection regulations.
- Generative AI tools are used in ways that are inclusive, accessible, and equitable for students with disability and from diverse backgrounds.
- AI-generated content should be integrated in a way that enhances traditional teaching methods and student engagement.
- AI-generated content must not compromise the authenticity of assessment tasks.
- Ethical considerations such as algorithmic bias, transparency, and fairness must be taken into account. Teachers should guide students in understanding the potential implications of AI-generated decisions.
- Licensing and copyright implications for AI-generated content should be taken into account. Teachers and students should ensure proper attribution and referencing of AI-generated work, and be aware of the copyright requirements associated with AI.
- Teachers using AI tools should be mindful of technical aspects, including secure login, responsible account creation, and appropriate sharing of information generated by AI.
- Teachers and students should understand the data being collected, how it is processed, and the purposes for which it is used. Transparency about data usage ensures informed participation.

5.3 AI Risks

All AI systems exist on a spectrum of risk, ranging from low-risk (not automated, often non-operational, does not contain personal or sensitive data and does not have direct impacts on individuals) to high-risk automations (highly autonomous, normally operational AI systems with minimal controls that could impact individual and institutional safety and wellbeing). All ASA platforms will be assessed and managed in accordance with the NSW Artificial Intelligence Assurance Framework.

5.4 Ethical systems usage of AI

The ethical principles for the use of AI are applied at each phase of the AI system lifecycle. The lifecycle stages include:

- problem identification and requirements analysis
- planning, design, data collection and modelling
- development and validation (including training and testing stages)

- deployment and implementation
- monitoring, review and refinement (including when fixing any problems that occur) or destruction (removal of the system from use).

5.5 Training and Reliability

AI systems must only operate in accordance with their primary purpose or objective as outlined as part of the approval process. Where a change to the primary purpose is needed, this requires a separate risk assessment and endorsement.

Where AI is used by ASA to automate a function, process or decision that may impact staff, students or others, this must be specifically identified in the relevant privacy and/or AI use disclosure notice, which must include a review or enquiry mechanism.

5.6 Privacy

Where personal information is captured, used or stored by an AI system the business owner must complete a privacy impact assessment. This must be approved and managed in line with the requirements of the *Information Technology Policy and Procedure* and *Privacy Policy* and information security classifications.

Use of biometric identification must be treated as processing sensitive personal information (refer to *Information Technology Policy and Procedure* and *Privacy Policy* for more details).

Data used to develop algorithms or AI systems, and any data generated, shared, managed and/or recorded as part of an AI system's operation or algorithm, is considered corporate data and must be managed in line with the *Information Technology Policy and Procedure* and *Privacy Policy.* This requirement applies to the full system lifecycle and to the lifetime of the data, whichever is the longer.

6. Relevant HESFs

This Policy and the associated Procedure comply with the Higher Education Standards Framework (Threshold Standards) 2021. The following are relevant excerpts and specify that:

Standard 2.1 Learning Environment – Facilities and Infrastructure

2. Secure access to electronic information and adequate electronic communication services is available continuously (allowing for reasonable outages for maintenance) to students and staff during periods of authorised access, except for locations and circumstances that are not under the direct control of the provider.
3. The learning environment, whether physical, virtual or blended, and associated learning activities support academic interactions among students outside of formal teaching.\

Standard 3.3 Learning Resources and Educational Support

2. Where learning resources are part of an electronic learning management system, all users have timely access to the system and training is available in use of the system.
3. Access to learning resources does not present unexpected barriers, costs or technology requirements for students, including for students with special needs and those who study off campus

Standard 2.4 Student Grievances and Complaints

1. Current and prospective students have access to mechanisms that are capable of resolving grievances about any aspect of their experience with the higher education provider, its agents or related parties.

2. There are policies and processes that deliver timely resolution of formal complaints and appeals against academic and administrative decisions without charge or at reasonable cost to students, and these are applied consistently, fairly and without reprisal.
3. Institutional complaints-handling and appeals processes for formal complaints include provision for confidentiality, independent professional advice, advocacy and other support for the complainant or appellant, and provision for review by an appropriate independent third party if internal processes fail to resolve a grievance.
4. Decisions about formal complaints and appeals are recorded and the student concerned is informed in writing of the outcome and the reasons, and of further avenues of appeal where they exist and where the student could benefit.
5. If a formal complaint or appeal is upheld, any action required is initiated promptly.

Standard 3.3 Learning Resources and Educational Support

1. The learning resources, such as library collections and services, creative works, notes, laboratory facilities, studio sessions, simulations and software, that are specified or recommended for a course of study, relate directly to the learning outcomes, are up to date and, where supplied as part of a course of study, are accessible when needed by students.
2. Where learning resources are part of an electronic learning management system, all users have timely access to the system and training is available in use of the system.
3. Access to learning resources does not present unexpected barriers, costs or technology requirements for students, including for students with special needs and those who study off campus.
4. Students have access to learning support services that are consistent with the requirements of their course of study, their mode of study and the learning needs of student cohorts, including arrangements for supporting and maintaining contact with students who are off campus.

Standard 5.2 Academic and Research Integrity

1. There are policies that promote and uphold the academic and research integrity of courses and units of study, research and research training activities, and institutional policies and procedures address misconduct and allegations of misconduct.
2. Preventative action is taken to mitigate foreseeable risks to academic and research integrity including misrepresentation, fabrication, cheating, plagiarism and misuse of intellectual property, and to prevent recurrences of breaches.
3. Students are provided with guidance on what constitutes academic or research misconduct and the development of good practices in maintaining academic and research integrity.
4. Academic and research integrity and accountability for academic and research integrity are maintained in arrangements with any other party involved in the provision of higher education, including placements, collaborative research, research training and joint award of qualifications.

Standard 5.3 Monitoring, Review and Improvement […]

7. The results of regular interim monitoring, comprehensive reviews, external referencing and student feedback are used to mitigate future risks to the quality of the education provided and to guide and evaluate improvements, including the use of data on student progress and success to inform admission criteria and approaches to course design, teaching, supervision, learning and academic support.

Standard 6.3 Academic Governance[…]

2. Academic oversight assures the quality of teaching, learning, research and research training effectively, including by:

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d. maintaining oversight of academic and research integrity, including monitoring of potential risks
e. monitoring and initiating action to improve performance against institutional benchmarks for academic quality and outcomes
f. critically evaluating the quality and effectiveness of educational innovations or proposals for innovations
g. evaluating the effectiveness of institutional monitoring, review and improvement of academic activities, and […]

7.2 Information for Prospective and Current Students […]

2. Information for students is available prior to acceptance of an offer, written in plain English where practicable, accompanied by an explanation of any technical or specialised terms, and includes:
a. information to assist in decisions about courses or units of study, including the course design, prerequisites, assumed knowledge, when and where courses/units are offered, application dates, arrangements for recognition of prior learning, standing credit transfer arrangements, pathways to employment and eligibility for registration to practise where applicable
b. information to assist in planning for and participation in educational and other activities, including contact points, advice about orientation and induction, delivery arrangements, technical requirements for access to IT systems for online activities, timetables, access to learning resources, avenues to participate in decision making and opportunities to participate in student representative bodies
c. information to outline the obligations of students and their liabilities to the higher education provider including expected standards of behaviour, financial obligations to the higher education provider, critical deadlines, policies for deferral, change of preference/enrolment and leave of absence, particular obligations of international students, disciplinary procedures, misconduct and grounds for suspension or exclusion
d. information to give access to current academic governance policies and requirements including admission, recognition of prior learning, transition, progression, assessment, grading, completion, qualifications, appeals, academic integrity, equity and diversity, intellectual property and withdrawal from or cancellation of enrolment
e. information to facilitate access to services and support including the types of services available such as educational resources including English language support, personal support services, cultural support and ancillary services, hours of availability, how to access services and emergency contact details where applicable
f. information to assist in resolution of grievances, including an explanation of processes for resolution of grievances and complaints and internal and external appeals processes, guidance on how to participate in the processes and sources of assistance including advocacy, and
g. information to assist international students studying in Australia if applicable, including indicative costs of living and studying in Australia, accommodation options, arrangements for health care and, where applicable, schooling obligations related to school-aged dependants (including the possibility that school fees may be incurred). […]

7. Version Control

This Policy and Procedure has been reviewed and approved by the ASA Board of Directors as at June 2024 and is reviewed every year.

This Policy and Procedure, is published and available on the ASA website https://www.asahe.edu.au/policies-and-forms/.

Change and Version Control				
Version	**Authored by**	**Brief Description of the changes**	**Date Approved:**	**Effective Date:**
2024.1	Academic Dean	New policy and procedure developed to address the emerging technology, including the risks and opportunities posed by this advance. The document outlines the implications and operational concerns the AI presents and acknowledges our adoption into our BAU.	27/06/2024	01/07/2024