UNIVERSITY OF
FORWARD
THINKING
WESTMINSTER

# University of Westminster AI Policy in Relation to the Safe and Ethical Use of Generative AI (GenAI)

## Executive Summary

This policy outlines the safe, ethical, and effective use of Generative AI (GenAI)[1] at the University of Westminster. It recognises the potential of GenAI as a transformative tool for learning, teaching, and research, while establishing clear guidelines to protect privacy, uphold academic integrity, and encourage responsible innovation. All GenAI applications must undergo a thorough review in consultation with the relevant compliance teams to ensure they meet legal, ethical, and security standards.

The University encourages the use of GenAI when it is transparent, ethical, and contextually appropriate. All users[2] should disclose any use of GenAI where it makes a substantive contribution to any outputs and verify the accuracy of AI-generated content.

To support the University's commitment to AI literacy, training and resources will be provided to help students and colleagues adapt to this evolving technology.

## 1. Purpose and Scope

This policy sets out the guidelines for the use of Generative Artificial Intelligence (GenAI) systems[1] by the University of Westminster and should be read in conjunction with the **University's position statement on the use of GenAI** and the **Guidance on the Use of Generative AI for Students**.

The policy applies to all students, colleagues, third-party suppliers, and partners involved in using or developing GenAI systems within or on behalf of the University. The aim of these guidelines is to support the safe, ethical, and responsible use of GenAI, while also helping students and colleagues adapt to its growing role in teaching, learning, industry, commerce and professional practice.

## 2. Definition

For the purposes of this policy, Generative Artificial Intelligence (GenAI) is defined as an AI system that generates new outputs in a range of possible formats such as text, images, code, or sounds (including, for example, music, singing, or voice narration). Examples

[1] This relates to systems that are either accessible publicly or only through secure internal interfaces.
[2] Users may include students, colleagues, research participants, data subjects or researchers.

include ChatGPT, Claude, Microsoft Copilot, Gemini, Grammarly Go, Adobe Suite AI tools, Grok, and Eleven Labs.

## 3. Ethical Considerations

All users of GenAI must consider the ethical and legal implications of their work. GenAI systems can generate harmful, misleading, biased, or discriminatory content, and they must not be used to promote discrimination, bias, or harm. The following principles guide GenAI use at the University:

### 3.1 Fairness

GenAI must not be used to create unfair or inequitable conditions. Any suspicion of AI misuse in an academic context must be based on clear, verifiable evidence from or related to the submitted work itself, not from student engagement patterns, attendance, or perceived ability. The University is committed to minimising the risk of bias-driven misconduct allegations, particularly for students from widening participation backgrounds.

### 3.2 Transparency

GenAI use should be as transparent as possible in all use case scenarios3. Users must be explicitly informed when GenAI is being used, the reason for its use, and its intended purpose. When personal data is processed, appropriate privacy notices must be published and accessible to data subjects.

### 3.3 Accountability

Those who use or deploy GenAI are responsible for acting professionally and are accountable for any intentional or potential harm or misuse.

### 3.4 Respect for Privacy

GenAI must not be used to collect, store, access, process, or share personal data without a valid lawful basis under UK GDPR, DPA 2018, and the UK's Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR). While consent is one lawful basis for processing, it is not the only one; other bases, such as legitimate interests or contractual necessity, may also apply.

### 3.5 Inclusiveness

GenAI systems and outputs should empower everyone and help combat discrimination.

---

[3] Use case scenarios may include, for example:
a) colleagues or students using third-party publicly accessible GenAI systems such as ChatGPT;
b) a researcher developing a GenAI system;
c) a research participant who is asked to interact with, or whose data is being incorporated into, an in-university developed GenAI system;
d) an individual staff member or student whose data is being added to a corporate GenAI system.

### 3.6 Reliability

GenAI outputs should be as valid and reliable as possible.

### 3.7 Environmental and Digital Sustainability

The University is committed to ensuring that its use of GenAI aligns with its institutional sustainability goals.

Third-party providers of GenAI services should have published sustainability and ethical commitments, including the use of renewable energy and verified targets for carbon reduction and water preservation. The University recognises that cloud-based AI operations consume energy and resources, and it will work with its suppliers to ensure that such impacts are minimised, transparently reported, and offset where possible.

The University will periodically conduct a Digital Sustainability Assessment of its centrally provided GenAI systems to evaluate their environmental footprint where possible, including emission intensity and efficiency improvements. Findings will inform procurement decisions, service reviews and awareness raising around sustainable digital practice. This approach will help ensure that the deployment of AI contributes positively to operational efficiency and innovation, while remaining consistent with the University's environmental responsibility.

## 4. Data Privacy and Information Security

The University is committed to safeguarding user privacy in the development and deployment of GenAI systems. All data must be handled in accordance with the University's Data Protection Policy and relevant laws to ensure secure transmission, storage, and management. To achieve this, the following key principles must be adhered to:

### 4.1 Lawful Basis

Processing personal data through GenAI systems must have a valid legal basis under UK GDPR, DPA 2018, and PECR.

### 4.2 Notices

Clear and accessible privacy notices must be provided whenever personal data is processed.

### 4.3 DPIA

Data Protection Impact Assessments (DPIAs) are mandatory for AI systems that process personal data.

### 4.4 Security

Effective technical and organisational measures must be implemented to protect data from unauthorised access, breaches, or attacks.

### 4.5 Research Data

GenAI systems and related datasets used in research must comply with the University's Research Data Management Policy.

## 5. Usage Guidelines

GenAI must be used ethically, responsibly, and in accordance with the principles of academic integrity and honesty. It must not be used to deliberately deceive, manipulate, or falsify information. All outputs generated by GenAI should be scrutinised for accuracy, reliability, and potential bias before sharing or publishing. Any use of GenAI to create harmful content, such as deepfakes[4], misinformation, or misleading representations, is strictly prohibited. Users must take full accountability for the content they generate, and any intentional or unintentional harm caused by GenAI use must be addressed and rectified promptly.

### 5.1 Disclosure of GenAI Use

Users must disclose the use of Generative AI when it makes a substantive or material contribution to academic, research, or professional outputs, for example, formal submissions, assessments, publications, or work representing the University.

Disclosure is not required for routine use of AI tools, such as for drafting emails, checking grammar, or generating ideas, provided the user maintains authorship and takes full responsibility for the final content.

To support transparency and authorship verification, users may optionally use tools like the Grammarly Authorship system available through the University's Grammarly Authorship licence.

### 5.2 Creative Disciplines

In creative and practice-based disciplines (e.g., Music, Art, Media), Generative AI may be employed as a creative tool, compositional aid, or research resource, except where its use is explicitly and justifiably restricted. All AI-generated content or contributions must be appropriately referenced to acknowledge the role of Generative AI in the creative process. This practice promotes transparency and upholds academic integrity within creative work.

### 5.3 Intellectual Property

The University retains ownership of all intellectual property (IP) created using Generative AI (GenAI) through its corporate systems (e.g., Microsoft Office, Blackboard VLE), unless an alternative arrangement has been explicitly agreed upon in writing.

[4] A deepfake may be defined as a video of a person in which their face or body has been digitally altered so that they appear to be someone else, typically used maliciously or to spread false information.

### 6. Risk Management and Compliance

All proposed work using AI tools or systems that are currently not part of existing systems or are new (i.e. not part of the current set of tools provided and supported by the university) must undertake a preliminary risk assessment. Following this, all proposals for the procurement and use of new systems must be discussed with Information Compliance (email dpa@westminster.ac.uk) and with Cybersecurity at Westminster (by logging a service desk ticket)

**Risk Classification:**

- **High-risk**: GenAI systems that affect safety, fundamental rights, or process personal data; AI-assisted research involving personal data.
- **Low-risk**: AI-assisted research with no personal data; use of approved corporate systems for routine tasks.

**Notification**:
High-risk implementations must be notified to the University's Risk and Resilience Manager, and Information Compliance Team.

**Consultation**:
Approval bodies must consult with compliance functions (Information Compliance, ISS, Records Management, Research Management, etc.) before granting approval.

**Record Keeping**:
All approved AI system implementations must maintain comprehensive records of AI usage.

**Remediation**:
High-risk systems must not go into production without remediation. Any residual risks must be escalated for formal acceptance and audit.

## 7. Use Cases and Restrictions

Use cases for GenAI are classified into two categories: those suitable for self-assessment/notification and those requiring formal committee scrutiny and approval.

**Self-assessment/notification**: Most uses within internal, secured corporate tools are likely to fall into this category.

**Formal scrutiny**: Some use cases, even with internal systems, may require ethics body scrutiny before approval.

The **GenAI Use Case table** will be regularly updated as new use cases emerge.

## 8. Authority for Decision Making

The authority to make decisions regarding the use of GenAI technologies that require formal scrutiny lies with the relevant **Ethics Group**. These groups, are composed of representatives from key departments and relevant stakeholders, and have the responsibility to:

- **Evaluate proposed use cases** of GenAI to ensure they meet the University's standards.
- **Approve new GenAI applications** and ensure their alignment with university values, legal requirements, and ethical guidelines.
- **Assess potential risks**, including privacy, security, and compliance concerns.
- **Monitor ongoing compliance** with university policies and regulations related to the use of GenAI.
- **Address any ethical or regulatory issues** that arise from GenAI usage and make adjustments as necessary.

This process ensures that all decisions about GenAI use are transparent, ethically sound, and legally compliant. Decisions will be made in consultation with compliance teams, including Information Compliance, ISS, LIDE and Records Management, to guarantee all aspects of risk and legality are fully considered.

## 9. Information Sharing

In line with its commitment to transparency and ethical use of GenAI technologies, the University of Westminster ensures that all stakeholders are informed about how GenAI is employed. The following principles outline the requirements for transparency, disclosure, and monitoring related to the use of GenAI:

### 9.1 Transparency

The University of Westminster is committed to being open about its use of GenAI technologies. Information about how GenAI is used, including its purpose and any impact on privacy or personal data, must be shared with students, employees, and relevant third parties. This ensures everyone understands the implications of GenAI.

### 9.2 Disclosure

Students and employees must disclose the use of Generative AI when it makes a material contribution to academic, research, or official outputs that are assessed, published, or publicly shared. Disclosure is not required for incidental or background use in routine professional activities such as correspondence, scheduling, or administrative communication.

### 9.3 Monitoring

The University may monitor the use of GenAI to ensure compliance with this policy. Misuse of GenAI may result in disciplinary action. Any suspected misuse should be reported to GenAI@westminster.ac.uk.

## 10. Training and Awareness

- All users must complete mandatory training on the ethical use of GenAI, covering responsible use, privacy, data protection, and compliance.

- Training is required for all staff (including experienced lecturers) and all students upon joining the University.
- Training programmes must be measurable, with defined learning outcomes.
- The University is committed to developing AI literacy for both students and staff, including through online modules and best practice sharing.

## 11. Monitoring and Auditing

The University will periodically monitor GenAI use to ensure compliance with this policy. Audits will be conducted by relevant departments to assess adherence and identify opportunities for improvement.

## 12. Review and Updates

This policy will be reviewed annually, or more frequently, if necessary, to ensure its relevance and compliance with technological advancements and legislative or policy changes. Recommendations for updates may be submitted to the following bodies:

**University Research and Knowledge Exchange Ethics Committee**

**College Teaching Committee**

**Professional Services Director's Group**

## 13. Policy Approval and Implementation

This policy is approved by the University Executive Board (UEB) and will be implemented by the schools and professional services departments, working closely with relevant support services.

## 14. Related Policies

This policy forms part of the Information Security Management System (ISMS) at the University of Westminster. The Policy for the Safe and Ethical Use of Generative AI should be read alongside all other relevant University information management policies, which are regularly reviewed and updated to ensure the ISMS remains effective in supporting the University's business needs and legal obligations.

This policy is also aligned with the Code of Practice Governing the Ethical Conduct of Research, ensuring the responsible and ethical use of GenAI in academic and research activities. For a full list of related University policies and documents, please refer to the University of Westminster Policies and documents A-Z

## 15. Publishing Policies

This policy is published on the University website at https://www.westminster.ac.uk/about-us/our-university/corporate-information/policies-and-documents-a-z and can be requested in

a range of formats e.g. Word, PDF, plain text and alternative formats such as large print or Braille.

Last updated: 01/10/2025
Next review date: 31/03/2026