POLICY IN RELATION TO THE SAFE USE OF GENERATIVE AI (GenAI)

1. Purpose and Scope

This policy outlines the University of Westminster's approach to the ethical and safe use of Generative Artificial Intelligence (GenAI) systems. It emphasises our commitment to enhancing human creativity and productivity through GenAI, positioning these technologies as assistants rather than replacements for human ingenuity. Our approach advocates for GenAI to act as a creative partner, enriching the capabilities of our students, colleagues, and partners. Emphasising transparency, equity, security, accuracy, and privacy, we aim to harness GenAI in alignment with our core values, ensuring it catalyses human-centred innovation.

The policy should be read with the University's 'position' statement on using GenAI. It applies to all students. colleagues, third-party suppliers, and partners engaged in using or developing such systems within or on behalf of our institution. A principal purpose of the policy is to provide a framework within which GenAI is used at the university and help support students and colleagues in the widespread use of GenAI across work in the university, industry, commerce, and the professions.

2. Definitions

For this policy, GenAI is defined as an AI system that generates new outputs in various possible formats such as text, images, sound or video (including, for example, music, singing, voice narration). Some specific current examples of such GenAI systems include ChatGPT, Bing AI, Google Gemini, Jasper and Synthesia.

3. Ethical Considerations

All users [1] of GenAI must consider their work's ethical and legal implications. This includes being mindful that GenAI systems can generate harmful, misleading, biased, or discriminatory content. GenAI must not be used to promote discrimination, bias, or harm. The following AI ethics principles will guide the use of GenAI at the University:

3a. Fairness: GenAI should not be used to create unfair or inequitable conditions for users and participants.

3b. Transparency: GenAI should be as transparent as possible in all use case scenarios so that users understand how the technology and its algorithms are being deployed and if and how any of their university data is being used. Users should be explicitly aware of when GenAI is being used, for what reason, and for what purpose.

3c. Accountability: Those who use or deploy GenAI will act professionally and be accountable for any potential negative impact.

3d. Respect for privacy: The use of GenAI should respect the privacy of users and should not be used to collect, store, access or share their data without their consent. This includes not generating a likeness of others in images, videos, audio, or written form without consent.

3e Inclusiveness: GenAI systems and outputs should empower everyone, serving to help combat the possibility of discrimination.

3f Reliability: The output from GenAI systems should be as valid and reliable as possible.

[1] Users may include students, colleagues, research participants, data subjects or researchers.

The University will provide both online and face-to-face training opportunities for all stakeholders that are focused on ethical considerations in relation to the use of GenAI (see section 10 below).

4. Data Privacy and Information Security

The University undertakes to protect the privacy of users[2] when using and training GenAI. This includes not collecting storing, accessing or sharing personal data without consent and using or ensuring appropriate security measures to protect data from unauthorized access (see below). All data used in the development and operation of GenAI systems must respect the privacy and rights of individuals involved and be securely transmitted, stored and managed in accordance with the University of Westminster's Data Protection Policy and relevant data protection laws. In the case of the development of GenAI systems by researchers for research and the creation of datasets to train such a system, this should also be done in accordance with the University's Research Data Management Policy.

The University will take all reasonable steps to protect the security of its computer systems and networks when GenAI is being used through corporate systems. This includes using appropriate security measures to protect against malicious attacks and ensuring that users know 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.

5. Usage Guidelines

GenAI must be used responsibly and not used to deceive or falsify deliberately. This includes checking as far as possible that outputs are accurate and non-biased. Inappropriate uses, such as creating deep fakes[2] or generating misleading content, are strictly prohibited, other than when creating deep fakes for an integral component of a specific taught curriculum.

All users must always clearly disclose the use of GenAI when sharing or publishing generated content or when generated content contributes significantly to producing a written output. Concerning student coursework, the university is committed to developing various authentic approaches to assessing students' attainment of sought learning outcomes. However, Students who use GenAI in their coursework must ensure it is permissible (see University Advice to Students on GenAI and Procedures Relating to Academic Misconduct and Diversity and the Dignity at Work and Study Policy).

Colleagues who use GenAI in their research and/or to help teach their discipline must ensure that the use is permissible and that they are open about the use of GenAI. The University will provide training support to all stakeholders and maintain a library of critical resources to support understanding of the appropriate use of GenAI tools and systems (see section 10 below).

6. Risk Tolerance and Ownership

The University of Westminster recognises the need to define its risk tolerance for using GenAI. A balanced approach will be adopted, considering the potential benefits and the associated risks. GenAI systems that negatively affect safety or fundamental rights (see Fundamental rights in AI – What to consider) or raise significant ethical issues in research and knowledge exchange activity will be considered high risk. GenAI systems considered a high risk should not go into production without remediation. Residual risks should be escalated to the University Senior Information Risk Officer, namely the University Secretary and Chief Operating Officer, for formal acceptance and auditing purposes in accordance with the University risk management methodology.

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[2] A deepfake may be a video of a person whose face or body has been digitally altered to appear to be someone else, typically used maliciously or to spread false information. It should be noted that there may be circumstances where deepfakes may be generated for legitimate teaching and/or learning purposes.

The responsibility for initial assessment of risks rests with the individuals or teams who will be directly involved in supporting or using the GenAI system concerned. Further information on the Risk Assessment Process is available via this link. The responsibility for assessing novel use cases will be designated to the appropriate oversight body (Ethics Committee for University Research and Knowledge Exchange or the relevant College Teaching Committee). In the case of using GenAI by Professional Services, ethical oversight will be provided by the Professional Services Director's Group.

7. Use Cases and Restrictions

To mitigate risks associated with GenAI use, the University of Westminster will classify use cases according to whether they are appropriate to be considered through a Self-Assessment and notification route or whether they require more formal committee scrutiny and approval. Some indicative use cases covering learning and teaching and research are shown as examples in this list of GenAI Use Cases.

It can be anticipated that most proposed uses conducted in internal facing, secured corporate tools and systems are likely to be categorised within the Self-Assessment and Notification category. It is also intended that as we advance, the GenAI Use Case table will be regularly updated as new low-risk use cases emerge. However, it can also be anticipated that some use cases, even if they use internal facing systems, may need scrutiny by the relevant ethics body.

8. Authority for Decision Making

The authority to make decisions regarding the uses of GenAI that require formal scrutiny, rests with the relevant Ethics or other Group. These groups, comprising representatives from relevant departments and key stakeholders, will be responsible for evaluating proposed use cases, approving new applications, assessing risks, monitoring compliance, and addressing ethical concerns related to GenAI. For teaching this would normally be the relevant College Teaching Committee. For research, the relevant groups would be the University or College Research and Knowledge Exchange Ethics Committees. For Professional Services activities this will be the Professional Services Director's Group.

9. Information Sharing

9a. Disclosure to Students, Employees, and Third Parties: The University of Westminster recognizes the importance of transparency and open communication. Therefore, information about the use of GenAI should be disclosed to students, employees, and relevant third parties. Such disclosure should include the nature of the GenAI system being used, the purpose for which it is being used, and any potential impact on individuals' data or privacy.

9b. Disclosure Requirements: Students and employees who use GenAI to generate content through systems or software that they would not be expected to be using within their subject context and/or the guidance of their tutors, must disclose this fact when submitting or sharing the generated content. They should clearly indicate that GenAI was involved in the creation process.

9c. Employee Monitoring: The University reserves the right to monitor the use of GenAI by employees to ensure compliance with this policy. Employees and students should be aware that the use of GenAI, and particularly external public facing systems, without due consideration of the legal and ethical implications of their work, may result in disciplinary action. Any suspected misuse of GenAI should be reported in the first instance by email to GenAI@westminster.ac.uk

10. Training and Awareness

The University of Westminster is committed to promoting the use of GenAI in ethical ways through training and awareness programs. All users of GenAI are required to complete a training program on the ethical use of AI. This training program will cover topics such as the responsible use of GenAI, ethical considerations, privacy, data protection, and compliance with this policy. For colleagues (academic and professional services) courses geared towards the use of GenAI in teaching, learning and wider working practices will be provided. For students, sessions covering ways of using GenAI to support independent and personalised learning will be offered.

11. Monitoring and Auditing

The University of Westminster will periodically monitor the use of GenAI to ensure compliance with this policy. Audits will also be carried out by relevant departments (e.g., Learning Innovation and Digital Engagement for the virtual learning environment and Information Systems and Services for Microsoft Office 365) to assess adherence to ethical guidelines and identify areas for improvement.

12. Review and Updates

This policy will be reviewed at least bi-annually, or more frequently, if necessary, to ensure it remains relevant and up to date with technological advancements and legislative changes. Recommendations for updates or improvements to the policy may be submitted to either the University Research and Knowledge Exchange Ethics Committee for University Research and Knowledge Exchange activity or the relevant College Teaching Committee (for teaching related matters) or the Professional Services Director's Group (for corporate services matters).

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 GenAI should be read in conjunction with all other University information management policies, which are reviewed and updated as necessary to maintain an effective Information Security Management System to meet the University's business needs and legal obligations, and the University's Code of Practice Governing the Ethical Conduct of Research

15. Publishing Policies

This policy is published on the University website at https://www.westminster.ac.uk/about-us/ouruniversity/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.

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