Dumfries and Galloway College
One step ahead

ARTIFICIAL INTELLIGENCE POLICY

Responsibility: Director Student Experience and Innovation

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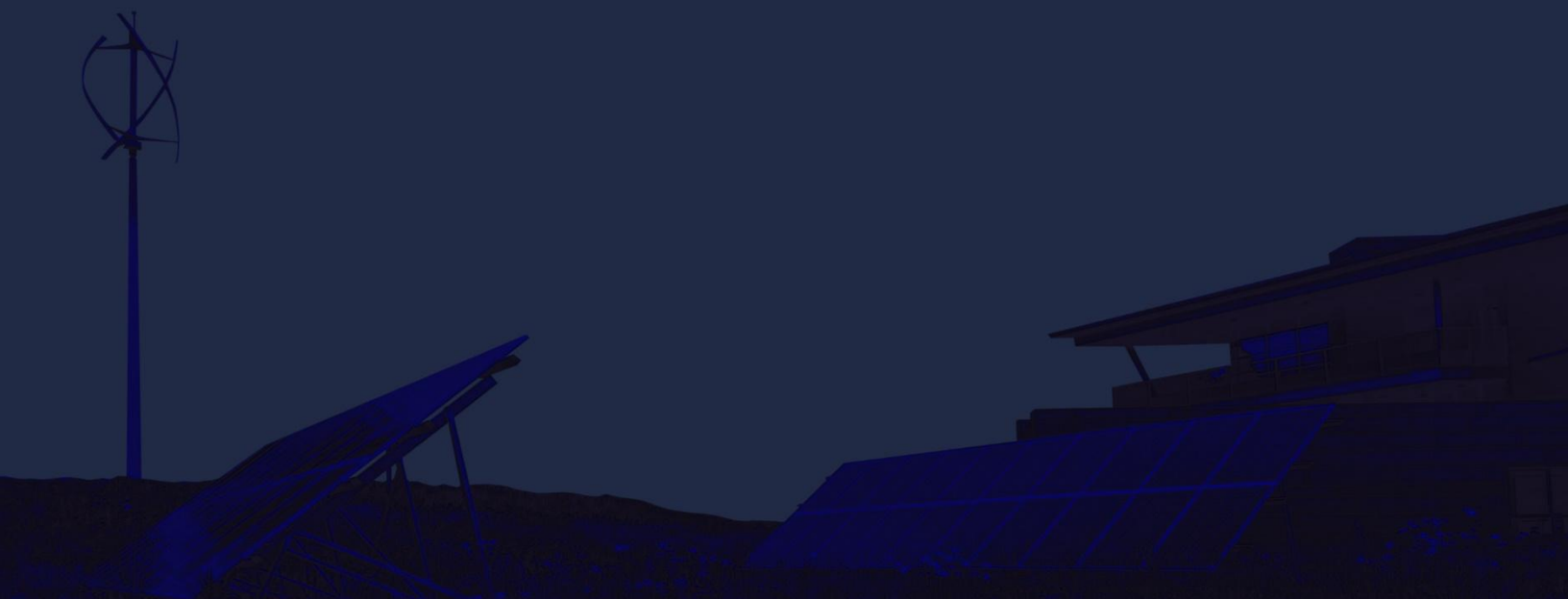

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Artificial Intelligence Policy

1. Purpose

The purpose of this policy is to set out the College commitment to the use of Artificial Intelligence (AI). We aim to help college staff and students navigate challenges and maximising the opportunities of AI. Our policy is centred around fair and responsible use of AI, giving a framework to provide students with the AI skills they need to thrive, and to allow college staff to take full advantage of AI in their daily activities.

2. *Scope*

This policy applies to all Dumfries and Galloway College sites, staff, students, and third parties using or engaging with College AI systems or data. It includes on-site operations, remote working, and online platforms. The policy is informed by Jisc, Department for Education (DfE), and Russell Group guidance.

3. *References*

- DGC AI Guide for Students
- DGC AI Guide for Staff
- Jisc – Principles for the use of AI in FE Colleges Principles for the use of AI in FE colleges - Jisc
- Scottish AI Tertiary Education Network (SCAITEN) – Statement of Principles
    - A sector-informed ethical framework for Scottish tertiary education, referenced to support values-based reflection alongside Jisc guidance and statutory governance requirements.
- DfE: Generative AI in Education (2023)
- UK Government AI White Paper

4. *Definitions*

AI	Artificial Intelligence - Refers to computer systems capable of performing complex tasks that historically only a human could do, such as reasoning, making decisions, or solving problems
DGC	Dumfries and Galloway College
Cyber Security	The practice of protecting systems, networks, and data from cyber threats, including hacking, unauthorised access, data breaches, and malicious misuse. Cybersecurity ensures the confidentiality, integrity, and availability of digital systems, including AI tools and platforms.

Generative AI	A type of AI that can create new content, such as text, images, or audio, often using large
Information Asset Owner (IAO)	Staff member responsible for managing specific sets of College data and overseeing the safe use of AI systems in their area.

5. Responsibility

It is the responsibility of the College to ensure we are committed to ensuring our students and staff have the skills they need to thrive in a world increasingly influenced by AI.

- The Information Governance Group (IGG) will review new AI use cases with input from relevant Information Asset Owners (IAOs), Digital Services Manager, and the Data Protection Officer. Where appropriate, the IGG may seek independent advice on high-impact or sensitive AI deployments.
- IAOs are responsible for conducting and signing off DPIAs, authoring privacy notices, and ensuring appropriate human oversight of AI systems within their remit.
- Learning & Teaching staff will provide training and awareness reference materials for students and may seek the input of relevant experts.
- Academic staff will communicate the requirements around AI use to students for coursework and assessment purposes, also based on the needs/advice of awarding bodies.
- All staff and students are responsible for using generative AI in an appropriate way. This includes not inputting personal or sensitive data, without specific College approval, and checking outputs against other sources for verification as applicable, before incorporating AI outputs into work or business activities.

6. Policy

Dumfries and Galloway College's approach to Artificial Intelligence is informed by sector-recognised ethical principles and national guidance, including those developed by Jisc and the Scottish AI Tertiary Education Network (SCAITEN).

The SCAITEN Statement of Principles provides a values-based ethical lens to support responsible innovation, transparency, and human-centred use of AI within tertiary education. These principles are used to inform reflection, dialogue, and good practice across learning, teaching, support services, and organisational use of AI.

The adoption of ethical principles does not replace or override statutory and regulatory requirements. All use of AI at Dumfries and Galloway College remains subject to UK GDPR, data protection law, cyber security requirements, Equality Impact Assessment, Data Protection Impact Assessments (DPIAs), and governance oversight through the Information Governance Group (IGG), as set out in this policy.

6.1 **Principle 1**:

DGC will place safe, ethical and responsible use of AI at the forefront of considerations. This principle aligns with the ethical expectations set out in the SCAITEN Statement of Principles, particularly in relation to transparency, fairness, accountability, and human oversight.

6.1.1 Safety, Security and Robustness

DGC will place the safety of students and staff at the forefront of the use of AI. This includes ensuring all systems are fully evaluated before use, are appropriate for the age group of the students.

DGC will ensure that all AI systems are protected against cybersecurity threats, including hacking, data breaches, and malicious misuse. To achieve this, state-of-the-art security measures such as encryption, secure authentication, and regular security audits will be implemented. Systems will be monitored for potential vulnerabilities, and updates or patches will be applied promptly to address emerging threats.

In the event of a cybersecurity incident involving AI systems, DGC will follow a predefined incident response plan. This will include isolating affected systems, notifying stakeholders, investigating the incident, and implementing

measures to prevent recurrence. Staff will also receive regular training to enhance their awareness of cybersecurity threats and best practices.

6.1.1.1 AI System Vulnerability Management

AI systems will undergo rigorous vulnerability assessments prior to deployment and during regular operation. These assessments will identify and mitigate risks, ensuring the systems remain secure against evolving cyber threats.

To support this, DGC will:

- Conduct periodic reviews of all AI systems to assess security performance and compliance.
- Apply updates, patches, and upgrades as a priority to address identified vulnerabilities.
- Train staff responsible for managing AI systems in cybersecurity best practices, ensuring they are equipped to safeguard against potential risks.

6.1.2 Transparency and Explainability

DGC will be transparent about their use of AI, and provide information on how, when, and for which purposes an AI system is being used. As well as aligning with the principles here, this also reflects the wishes and concerns of students expressed in the Jisc report on student perceptions of generative AI.

DGC will be open and transparent, ensuring students and staff understand when AI is used to create learning resources, support learning delivery or within the assessment and monitoring process. Where AI is used for assessment or monitoring purposes, or for any other use relating to personal data, this use will meet the requirements of data protection law by adhering to the data protection principles and rights, including transparency about the processing of personal data and the right to be informed.

Explainability in this context refers to explaining how the AI system makes its decisions.

6.1.3 Fairness

DGC will ensure AI systems used will be fair, including considering issues around bias, data protection and privacy and accessibility. This will be built into the procurement and selection process of AI tools used at DGC so that staff and learners are not , disadvantaged through the use of inappropriate or ineffective AI tools.

6.1.4 Accountability and Governance

As with any IT system, AI systems must have a clear governance structure, with a defined line of accountability for their use. This includes ensuring that cybersecurity is a critical component of AI governance, with designated roles and responsibilities for oversight.

Regular reviews will evaluate the cybersecurity performance of AI systems, ensuring that they comply with data protection regulations, safeguard user data, and mitigate risks effectively. Governance structures will include measures to monitor AI system performance and ensure the systems adapt to evolving threats or challenges.

6.1.5 Contestability

AI systems in colleges are likely to be increasingly used in a way that directly impacts on outcomes for students. This includes, for example, if used to assist in marking, exam proctoring, or the use of AI detection in assessment processes. Linked to the requirement to ensure fairness in the processing of personal data, DGC will ensure students and staff have clear guidance on how to contest the output of any AI system, if they feel they have been unfairly disadvantaged.

6.2 **Principle 2:**

DGC will support students to develop the skills they need to make appropriate use of AI tools in their studies and thrive in an AI enabled workplace and wider world

6.2.1 AI Skills and Literacy

AI is evolving at a rapid pace, and therefore, while teaching students to use the AI tools of today is valuable, this needs to be supplemented to include a broader AI literacy, to enable students to critically evaluate tools of the future. Advice from the department for education supported by guidance from UNESCO, provides an understanding of the limitations, reliability, and potential bias of generative AI, the impact of technology, including disruptive and enabling technologies and creating and using digital content safely and responsibly.

6.2.2 AI Workplace Literacy

Whilst many AI skills in use in education translate directly to the workplace, a broader understanding of where AI fits into the workplace will also be needed, for example the understanding of data privacy and cyber security issues.

DGC will work with employers, initiatives and key stakeholders to ensure their students are acquiring the AI skills needed.

6.2.3 AI Citizens and the Wider World

As well as preparing our students for studies and work, we will help them become AI Citizens equipped to navigate the use of AI in their everyday lives. AI is becoming embedded into the services we all use on a daily basis, and is impacting on broader societal issues, such as our democratic processes, climate and environment, and the way we consume and share information. We will ensure the students have the critical AI skills to navigate this world safely and confidently.

6.2.4 Assessment for an AI Enabled World

Authentic and relevant assessment, both formative and summative need to be aligned to this aim. DGC will work with awarding bodies, to move towards a consistent approach for the use of AI in assessments, with the aim of making assessments authentic and relevant to an AI enhanced workplace and society, for all students.

6.3 **Principle 3:**
DGC will ensure staff have the skills to maximise the value of AI to help reduce workload and support effective learning and teaching

6.3.1 Saving Time

Initial pilots and reports, including by and Department for Education, are showing that the promise of this technology in helping staff save time is being born out in practice.

Alongside making tasks quicker, activities that were challenging before because of time constraints become possible. Examples include improved differentiation for students, using AI to create resources in multiple ways and using AI to create formative assessment resources and materials.

We aim to ensure this benefit is felt by all staff, by providing access to the AI tools they need (subject to the approval process), and the training they need to take advantage of them which will improve their wellbeing.

6.3.2 New Learning and Teaching Opportunities

We are already seeing examples of how AI can present new learning and teaching opportunities. Many of these are gathered in the Department for Education's Generative AI in education Call for Evidence: summary of responses, and include, for example, providing guidance on coding, helping students optimise designs in engineering subjects, creating interactive simulations in sciences, and creating interactive conversations in language learning, ideas generation for English, and step by step explanations in maths.

6.4 **Principle 4:**

DGC will aim to ensure all students have access to AI tools they need

6.4.1 Equality of Access to AI Tools

AI tools have the potential to improve equality, for example by providing proof reading and feedback expertise to all, and by enabling students to obtain resources in a format and time that supports them. However, this will only be possible if access is available to all those who can benefit from it. Whilst there is a perception that generative AI is free to access, those that have the means to pay often have access to a much wider range of tools and will be at a significant advantage. Similarly, we will work to ensure access isn't restricted

for students with learning difficulties and/or disabilities. DGC will work to level this playing field as much as possible.

6.4.2 Equality Access to Data and Devices

There are some foundational issues that limit access to AI, including data capabilities and devices. We acknowledge this, and again will work towards levelling access as much as possible.

6.5 **Principle 5:**

DGC will ensure academic integrity is maintained, whilst allowing students to develop the skills they need

6.5.1 A College Wide Approach

DGC working with awarding organisations will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI. A mixed approach for this is needed, with clear guidance, well designed assessment and appropriate use of AI detection tools being core.6.5.2 Clear Guidance to Students

DGC will provide clear guidance to students on appropriate use of AI in their assignments. This includes general principles and guidance, along with more specific guidance at assessment level. Jisc have a template of guidance to help with this.

6.5.2 Appropriate Use of Technology such as AI Detection

Whilst AI detection tools may have a part to play in maintaining academic integrity, they are by no means a full solution. As co-creation of content becomes the norm, and authentic assessment incorporate AI aligns to this, any use of AI detection and what actually is being detected needs clear guidelines. There is a risk AI detection can unfairly discriminate and can compound existing bias, therefore, users of AI detection need a clear understanding that such systems cannot conclusively prove text was written by AI, generate false positives, and are easy to defeat. Where they are used, staff will be given training and guidance to help understand these limitations.

6.6 **Principle 6:**

DGC will Work Collaboratively and Share Practice

DGC supports the call for collaboration between universities, students, schools, FE colleges, employers, sector and professional bodies.
The size and speed of change means we will be stronger if we work together. Best practice is still emerging, and we will work together to share what works, and what doesn't. This includes contributing to events, to Jisc's library of good practices, and looking outside the college sector, to learn from and share ideas with businesses, universities and schools.

7. Distribution

All Staff
Repository

8. Revision Log

Revision Log		
Date	Section	Description
23.04.26	Throughout	New policy

THIS FORM TO BE UPDATED WHENEVER THERE IS A CHANGE IN ANY SYSTEM DOCUMENT				
Document Name	Document Owner	Revision Number	Date of Issue	Date of Withdraw
Artificial Intelligence Policy	Director of Student Experience and Innovation	1	23.04.26	

Appendix 1 – Equality Impact Assessment

Document:	Artificial Intelligence Policy
Executive Summary:	This policy outlines Dumfries and Galloway College's commitment to the responsible and effective use of Artificial Intelligence (AI) for both staff and students. It aims to provide a clear framework for embracing the benefits of AI while ensuring its ethical and safe application across all College activities. The policy aligns with best practices, such as Jisc guidelines, and reflects the College's mission to prepare students for an AI-enabled future while empowering staff to enhance their daily operations with AI technologies. Key objectives include ensuring fairness, safety, and transparency in AI usage, promoting AI literacy for students and staff, and providing equal access to AI tools and resources. The policy covers the governance and accountability of AI systems, student skill development for an AI-driven workplace, and maintaining academic integrity while adapting to the new capabilities AI offers. Dumfries and Galloway College is committed to fostering a collaborative environment that encourages sharing AI-related best practices with other institutions, employers, and the broader community. The ultimate goal is to prepare students and staff to navigate the rapidly evolving AI landscape confidently and responsibly.

Duties:

1: Eliminate discrimination, harassment and victimisation

2: Promote equality of opportunity

3: Promote good relations

* Human Rights to privacy and family life, freedom of thought and conscience, education, employment

PSED Impacts

	Commentary
Age	Consideration of age restrictions in AI tool licensing and differential access to technology among students and staff of different ages.
Disability	Commitment to inclusive design and AI tools that support accessibility (e.g., screen readers, alternative formats). Training materials will be designed inclusively.
Gender	No negative impacts identified. College will monitor for bias in AI tools and outputs that may inadvertently reinforce gender stereotypes.
Gender Based Violence	AI tools and datasets will be assessed for bias or inappropriate assumptions about gender identity.
Gender identity/ reassignment	AI tools and datasets will be assessed for bias or inappropriate assumptions about gender identity.
Marriage/civil partnership	No impact anticipated.
Pregnancy/maternity	No impact anticipated. AI use in assessment or attendance tracking must account for statutory protections.
Religion or Belief	AI tools must avoid assumptions or exclusionary practices based on belief systems. No adverse impact identified with current policy design.
Race	Risk of bias in AI-generated content or datasets is acknowledged. Mitigations include staff training and careful tool selection.
Sexual Orientation	No negative impacts identified. All language and content will remain inclusive.

Additional Considerations

Care experienced	Policy recognises potential digital poverty. Access to AI tools and devices is being addressed through inclusion strategies.
Carers	Flexibility in training delivery and access to AI-supported learning will support those with caring responsibilities or returning to education.
Mental Health	Students and staff with mental health needs will not be required to use AI tools in ways that create undue stress. Guidance will promote responsible use.
Socio-economic status	Digital divide is acknowledged as a key equity issue. Steps include device provision, free tools, and fair procurement.
Veterans	Flexibility in training delivery and access to AI-supported learning will support those with caring responsibilities or returning to education.
Human Rights*	AI usage will respect the right to privacy, freedom of thought and conscience, and access to education and employment. All processing will be compliant with UK GDPR and relevant equality law.

Lead Officer:	Director of Student Experience and Innovation		
Date initiated:	30/06/2025		
Consultation:	HEFESTIS Jisc		
Research:			
Signature	Kate Glendye	Date	30/06/2025

Appendix 2 - Acknowledgements

- The Russell Group's principles on the use of generative AI tools in education for providing a template for principles of AI in education
- The Department for Education's 'Generative artificial intelligence (AI) in education' lays the foundation for expectations of colleges
- The UK Government's AI white paper 'A pro-innovation approach to AI regulation' provides us with principles for safe and responsible use of AI
- Jisc 'A Generative AI Primer' lays out the main challenges and opportunities of AI in education
- Generative AI in education Call for Evidence: summary of responses,

Appendix 3 – AI Deployment Decision-Making Matrix

Assessment Area	**Low-Risk Use** (e.g., idea generation)	**Moderate-Risk Use** (e.g., learning tools)	**High-Risk Use** (e.g., assessment, decision-making)
Examples	Chatbot for spelling suggestions	AI feedback on writing style	AI flagging plagiarism, assessment scoring
Processes Personal Data?	No	Possibly	Yes
Impacts academic progress or wellbeing?	No	Possibly	Yes
Outputs directly affect staff workload?	No	Yes	Yes
Used in assessment or learner profiling?	No	Indirectly	Yes – directly impacts outcome
DPIA Required	No	Yes (if any personal data is involved). DPIA screening is required.	Yes (mandatory)
IAO Review Required?	No	Yes	Yes
IGG Review Required?	No	Yes	Yes – prior to any deployment
Student/Staff Training Required?	Optional	Recommended	Mandatory

Independent Advice Required?	No	Optional	Strongly recommended

Approval Flow

Low-Risk Tools – Can be approved by local teams with informal record-keeping.

Moderate-Risk Tools – Must be reviewed by the IAO and noted with the IGG.

High-Risk Tools – Require DPIA, privacy notice, IAO sign-off, and full IGG approval. External advice may be sought.

Appendix 4 – SCAITEN-Jisc-DGC Alignment Table

Ethical / Practice Theme	SCAITEN Statement of Principles (Summary)	Jisc Principles for AI in FE	How this is implemented at DGC
Human-centred use	AI should enhance, not replace, human judgement	AI should support learners and staff, not undermine autonomy	Human oversight required for AI systems; accountability assigned to IAOs; IGG oversight for moderate and high-risk use
Transparency	Institutions should be open about where and how AI is used	Transparency around AI use, limitations, and outputs	Clear communication to staff and students when AI is used; privacy notices and DPIAs where personal data is involved
Fairness & bias	AI should not entrench inequality or discrimination	Consider bias, inclusion, and accessibility	Equality Impact Assessment; bias considered during procurement; staff training and tool evaluation
Accountability	Clear responsibility for AI systems and outcomes	Governance structures required	Defined governance via IGG, IAOs, Digital Services Manager, and Data Protection Officer

Privacy & data protection	Respect privacy and data rights	Compliance with data protection law	Mandatory DPIAs for relevant AI use; UK GDPR compliance; no personal data entered into AI tools without approval
Contestability	Individuals should be able to challenge AI-assisted decisions	Safeguards around assessment and decision-making	Clear routes for students and staff to contest AI outputs, particularly where outcomes are affected
Skills & literacy	Build critical understanding of AI's role in society	Develop AI literacy for learners and staff	AI literacy embedded in curriculum, staff development, and student guidance
Responsible innovation	Encourage experimentation within ethical boundaries	Proportionate, risk-based adoption	AI Deployment Decision-Making Matrix; risk-based approval and phased implementation
Collaboration & sector learning	Share learning across tertiary education	Sector collaboration encouraged	Engagement with Jisc, EIS, HEFESTIS, and sector networks; sharing emerging practice