

ITALIA CONTI

AI Policy

Version	2526-1.0
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Reviewed by:	Policy Steering Group
Approved by:	Policy Steering Group Board of Directors
Approval date:	16 th June 2026
Next review due:	16 th September 2026

This policy will be reviewed by the Policy Steering Group and the Board at least every three months. It may also be reviewed sooner where there are relevant legal or operational changes, or where issues arising from its implementation indicate that an earlier review is necessary.

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1. Purpose of the Policy

- 1.1. The purpose of this Artificial Intelligence Policy is to articulate Italia Conti's strategic intent and operational framework for the responsible adoption and ethical use of AI technologies across all areas of the organisation.
- 1.2. Artificial intelligence presents significant opportunities to enhance teaching, learning, creative practice and professional services; however, it also raises complex legal, ethical and practical considerations.
- 1.3. This policy exists to maximise the benefits of AI while mitigating risks.
- 1.4. It sets out clear objectives and guiding principles for the responsible deployment of AI tools, particularly generative AI such as ChatGPT, Microsoft Copilot and Gemini, as well as other forms of machine learning and advanced automation.
- 1.5. AI technologies and their implications are rapidly evolving; therefore, the policy is designed to be dynamic and responsive, mandating regular review and adaptation to reflect emerging developments, sectoral guidance and legal requirements.
- 1.6. A core objective of the policy is to align the use of AI with Italia Conti's broader quality assurance and governance frameworks and provides a reference point for staff, students, contractors and partners, clarifying expectations and responsibilities and ensuring coherence with other institutional policies, including data protection, academic integrity, research ethics, and IT security.

2. Scope

- 2.1. The policy covers the use of AI on organisation-owned devices and networks as well as on personal devices when AI is used for institutional purposes.
- 2.2. The policy applies to all forms of artificial intelligence, including generative AI models and related developments such as Microsoft Copilot, ChatGPT, Gemini and Claude, but it also extends to other types of AI.
- 2.3. AI use in teaching, learning and assessment, research and knowledge exchange, professional practice in the creative arts, administrative operations, marketing and communications, admissions, student support, safeguarding and governance is governed by this policy.
- 2.4. AI use in relation to plagiarism and academic misconduct is discussed at more length in the Academic Misconduct policy.
- 2.5. The policy covers AI-assisted communications, including drafting emails or other messages, as well as AI integrated into platforms that support decision-making or resource allocation.

- 2.6. Wherever AI tools are used to process personal data, confidential business information or intellectual property associated with Italia Conti, this policy applies irrespective of device, location or user status.
- 2.7. For the purposes of this policy, the term “staff” includes those who are staff members employed directly by Italia Conti; it also includes those who are providing services on a contracted or freelance basis, visiting professionals, or external contractors who provide services on behalf of Italia Conti. It also applies to trainees, volunteers and other individuals who work or provide services on behalf of Italia Conti, Associate Schools & Companies.
- 2.8. For the purposes of this policy,
- **Artificial Intelligence (AI)** refers to technologies, including machine learning and generative systems, that enable computers to perform tasks that typically require human intelligence. These technologies can generate content, analyse data, recognise patterns, and support decision-making processes.
 - **Generative Artificial Intelligence (Gen AI)** refers to algorithms and models that generate new content based (often mimicking human creativity). These outputs can be in a range of formats, including (but not limited to) text, images, sound, video, code, simulations, designs, animations, music compositions, data tables, synthetic data, diagrams, charts, etc.
 - **AI tools / AI systems** refer to applications or software that use artificial intelligence to generate content, process data or support decision-making.
 - **AI-assisted use** refers to the use of AI to support or enhance work where the user remains the primary author and retains responsibility for the final output.
 - **AI-generated content** refers to material produced substantially or entirely by an AI system in response to prompts or input.
 - **Authorised use** refers to the use of AI in accordance with this policy and institutional guidance.
 - **Unauthorised use** refers to any use that breaches this policy, including misuse of AI tools or use in ways that compromise academic integrity, data protection or professional standards.
 - **AI-supported decision-making** refers to the use of AI outputs to inform, but not determine, decisions made by staff

- **Sensitive or confidential data** refers to personal data, special category data, commercially sensitive information, intellectual property or any information classified as restricted under institutional policies.

3. **Data Protection and information Security**

- 3.1. Italia Conti has a legal and ethical duty to protect the personal data and confidential information entrusted to it. The responsible use of artificial intelligence therefore requires stringent adherence to UK data protection legislation, including the Data Protection Act (2018).
- 3.2. AI tools process large volumes of information and may collect, store or transmit data to external servers, posing significant privacy risks.
- 3.3. Where AI tools are used in ways that involve personal data, a Data Protection Impact Assessment must be conducted in consultation with the Data Protection team to assess risks and determine appropriate safeguards. This includes any use of AI that processes special category data, such as information relating to protected characteristics under the Equality Act 2010, for which an Equality Impact Assessment may also be required.
- 3.4. Under no circumstances should personal data, confidential business information, proprietary institutional content or privileged legal advice be entered into public AI tools without appropriate authorisation and controls.
- 3.5. Prohibited information includes, but is not limited to:
 - personally identifiable information about students, staff or stakeholders;
 - safeguarding or wellbeing records;
 - HR, disciplinary or grievance documentation;
 - financial data;
 - commercially sensitive information;
 - unpublished research or assessment materials;
 - contracts;
 - privileged communications with legal counsel;
 - intellectual property owned by the organisation or its partners;
 - any third-party content for which rights have not been granted.
- 3.6. Italia Conti prohibits the input of any sensitive or proprietary information into AI tools unless the tool has been approved by IT Services and appropriate contractual safeguards are in place. (See Section 5 for recommended generative AI resources)

- 3.7. No new AI software or services may be implemented without following established IT procurement and security procedures accessed through the IT Steering Group.
- 3.8. When engaging third-party AI providers, Italia Conti will assess their information security practices and ensure that contractual terms address data protection, confidentiality, intellectual property rights, data retention and deletion, and incident reporting.
- 3.9. The use of AI does not diminish accountability. Individuals remain responsible for the confidentiality, integrity and availability of any data they process, and they may be held personally liable for breaches of data protection law or institutional policy.
- 3.10. Appropriate safeguards will be in place to protect systems and data from unauthorised access or misuse, including alignment with existing IT security and data protection policies.
- 3.11. Any suspected or actual security incident or data breach arising from AI use must be reported immediately to the Data Protection Officer (DPO@italiaconti.co.uk)

4. **Governance and Accountability Structure**

- 4.1. Italia Conti recognises that the responsible use of artificial intelligence requires clear governance, defined accountability and effective oversight.
- 4.2. Ultimate authority rests with the Board of Directors, which receives assurance that the institution has “effective mechanisms in place for the effective and ethical use and management of AI and related developments”.
- 4.3. Strategic oversight of AI adoption and implementation lies with the Co-Principals and Senior Leadership Team (SLT). The SLT approves the AI policy, ensures its effective implementation across the organisation, makes informed strategic and operational decisions, delegates work appropriately and provides assurance and risk mitigation to the Board.
- 4.4. The Academic Quality Board (AQB) has delegated authority for academic matters and is responsible for ensuring that academic policies and procedures uphold academic integrity. It receives reports on opportunities, good practices and risks arising from the use or misuse of AI, directs action as needed, and considers advice from its subcommittees and Course Review Boards. Where AI use intersects with learning and teaching, assessment or research, the AQB will ensure alignment with external regulatory requirements and professional accreditation standards.
- 4.5. The Data Protection Officer and the Data Protection team oversee compliance with data protection legislation and advise on Data Protection Impact Assessments.

- 4.6. The IT Manager and IT Steering Group evaluates, approves and manages AI software and services, ensuring cybersecurity and compliance with procurement procedures.
 - 4.7. A cross-functional AI Steering Group may be established to review emerging technologies, consider ethical implications, coordinate training and recommend updates to policy and practice.
 - 4.8. All staff, students, committees and working groups with specific responsibilities have a general duty to understand and engage with this policy and related policies and procedures, to attend training and development as appropriate, and to proactively consider, address or escalate new practices or issues arising from AI.
 - 4.9. Regular reports on AI use, risks, incidents and developments will be produced for the Academic Quality Board and Board of Directors, ensuring transparency and enabling informed decision making. Reports will be coordinated by the Quality Team with input from IT, Data Protection, HR and Safeguarding Leads as appropriate.
 - 4.10. This governance and accountability structure ensures that Italia Conti adopts AI in a manner that is ethical, secure, legally compliant and aligned with its mission and strategic objectives.
5. **Approved and Preferred AI Tools: Microsoft Co-Pilot within Office 365**
- 5.1. Italia Conti currently approves only one generative AI platform for use across its operations: **Microsoft CoPilot within the institution's Office 365 environment**. This tool is the preferred option for staff and students because it offers enterprise grade data protection and compliance features.
 - 5.2. The use of alternative generative AI platforms (for example, an Italia Conti Anthropic Claude account or similar tools) is permitted only where there is a clear and justifiable need that cannot be met by Microsoft Copilot. In such cases, authorised users must ensure that these platforms are used in a way that aligns with Italia Conti's data protection, confidentiality, and safeguarding requirements, and through registered Italia Conti accounts.
 - 5.3. Under no circumstances should sensitive, confidential, or personally identifiable information relating to students, staff, or the institution be entered into non-approved or external AI systems. Users remain responsible for ensuring that any output generated by alternative platforms is accurate, appropriate, and compliant with institutional policies.
 - 5.4. Where possible, Microsoft Copilot should remain the default choice, with other tools used cautiously, transparently, and in accordance with institutional guidance and relevant data protection legislation.

- 5.5. Microsoft acts as a **data processor**; it does not own the content created by users and does not use customer prompts or responses to train its foundation models.
- 5.6. Enterprise data protection (EDP) means that prompts and responses remain within the Microsoft 365 service boundary. These safeguards ensure that data remains private and that existing permissions, sensitivity labels and retention policies are respected.
- 5.7. Any output generated by CoPilot remains subject to existing policies on data protection, academic integrity and professional conduct; users must review and edit AI produced material to ensure accuracy, appropriateness and alignment with institutional values.
- 5.8. Other generative AI tools including public versions of ChatGPT, Gemini or similar services are not approved for processing Italia Conti data. They may be used for general brainstorming or non-sensitive tasks, but they must never be used to input or process personal data, confidential business information, assessment materials, intellectual property or any other information protected under the Data Protection Act 2018 or contractual obligations.
- 5.9. **Prohibited actions** include:
- Creating accounts or logging into AI services using personal credentials to handle institutional data.
 - Inputting any sensitive or confidential information—such as student or staff personal data, safeguarding records, HR files, financial information, disciplinary documentation, examination content or proprietary artistic works—into unapproved AI tools.
 - Using Co-Pilot or other AI services to make autonomous decisions or to circumvent institutional policies and procedures.
- 5.10. Provided that users review outputs and retain full responsibility for the content, **permitted uses** of Microsoft Co-Pilot include:
- drafting communications
 - summarising documents
 - generating ideas for teaching or artistic work
 - assisting with administrative tasks

6. Staff Use of AI for Communications

- 6.1. Italia Conti encourages staff to explore approved generative artificial intelligence tools as a means of enhancing efficiency and creativity in communication; however, these tools must not replace professional judgement, institutional tone or personal accountability.

- 6.2. Staff members remain the sole authors of all communications and are legally and professionally responsible for any messages disseminated under their name, regardless of whether AI assisted in drafting them.
- 6.3. AI can help brainstorm, organise or refine text, but it must never be the author of public facing communications.
- 6.4. AI should be viewed as a supportive mechanism only as generative output is susceptible to bias, mistakes and misinformation. Therefore, every AI generated draft must be carefully reviewed for factual accuracy, tone, intent and ethical integrity before being finalised
- 6.5. Staff must ensure that the tone of the communication aligns with Italia Conti's style and values, and that the message genuinely reflects the sender's intent.
- 6.6. When using AI for communications, staff must maintain an active role in thinking and decision making; "AI should help you think rather than think for you".
- 6.7. Communications involving confidential, personal, or sensitive matters (including, but not limited to, safeguarding concerns, student or staff wellbeing, complaints, disciplinary matters, or legal issues) must be authored and reviewed directly by the responsible staff member.
- 6.8. Generative AI tools may be used only in a limited, supportive capacity (for example, to assist with structure or drafting), and must not be used to produce complete communications in these contexts. Any AI-assisted content must be substantially reviewed, amended, and verified by the author to ensure accuracy, appropriateness, and compliance with institutional policies and professional standards.
- 6.9. Under no circumstances should identifiable or sensitive information be entered into non-approved AI systems. Staff retain full responsibility and accountability for the content, tone, and decisions reflected in all final communications.
- 6.10. Staff must be mindful of potential bias and discrimination embedded in AI generated content. AI tools are trained on large datasets containing societal biases and may produce language or imagery that reinforces stereotypes or excludes marginalised groups.
- 6.11. If AI contributes substantially to the content of an internal communication, document, or process beyond minor editing or drafting support staff should disclose this to colleagues so that accountability is clear.

7. **Academic Integrity and Student Use of AI**

- 7.1. AI tools can offer opportunities for learning, ideation and language support, but they are not substitutes for original thought, independent research or academic skill development.
- 7.2. Italia Conti encourages students to develop critical understanding of AI technologies, including their limitations and potential biases, and to discuss any use of AI with their tutors.
- 7.3. The use of generative artificial intelligence tools by students is governed by existing regulations on academic misconduct and plagiarism, and any breach of those regulations will be treated as a serious offence.
- 7.4. Students may only use AI tools for coursework if their programme or module leader has explicitly permitted such use, and any contribution from AI must be acknowledged and cited in accordance with the Italia Conti Academic Misconduct policy, and the Academic Misconduct regulations relating to their individual awarding body or partner university.
- 7.5. Where an assignment or learning activity does permit AI use, students must provide a full record of prompts and outputs and must critically evaluate the accuracy, validity and relevance of any AI-generated material.
- 7.6. Students remain wholly responsible for the work they submit and for ensuring that it is free from inaccuracies, bias, copyrighted material and ethical breaches

8. **Staff Use of AI in Learning, Teaching, Assessment and Reporting**

- 8.1. The deployment of artificial intelligence tools in learning, teaching, assessment and reporting must be grounded in rigorous professional judgement and transparency. AI technologies may assist with content generation, lesson planning, feedback, assessment design and administrative processes, but they are not substitutes for human expertise. Staff remain fully accountable for the accuracy, quality and integrity of educational activities and must exercise discernment when using AI tools.

9. **Teaching and Learning**

AI tools can support educational innovation by generating examples, suggesting alternative explanations, drafting teaching materials or facilitating interactive dialogue. Staff are encouraged to explore these capabilities to enhance student learning, recognising that AI will be pervasive in future workplaces. When integrating AI into teaching, tutors should:

- **Maintain human oversight and accountability.** AI output should never be presented to students without careful review. Faculty remain responsible for

all instructional decisions and must verify AI-generated content for accuracy, relevance and alignment with learning outcomes

- **Be transparent about AI use.** Instructors should disclose when AI has been used to develop course materials, activities, feedback or examples. Students should be informed about how AI supports their learning and be encouraged to ask questions.
- **Promote critical thinking and AI literacy.** AI should be used to stimulate independent thought rather than supply ready-made answers. Staff should model critical engagement with AI outputs, discuss biases and limitations, and guide students in evaluating AI-generated information
- **Use institutionally licensed tools and read terms carefully.** When choosing AI tools to support teaching, staff must consider data protection, privacy and security. Italia Conti endorses the use of Co-Pilot as part of the institutional licence which generates text and images without retaining personal data or using it to train models.
- **Design teaching activities that encourage engagement beyond AI.** Tutors should continue to choose tasks that require students to apply knowledge, interpret real-world data, create artifacts, solve problems or reflect on personal and professional contexts - activities that AI cannot easily replicate.

10. Assessment

Assessment design must uphold academic integrity and ensure that evidence of student achievement is authentic, robust and equitable. AI presents opportunities to streamline assessment design and feedback.

- 10.1. **Human grading and feedback.** AI must not be used to mark student work or provide evaluative feedback. AI tools must not be used to upload student work or to produce marks or feedback. All grading must be conducted by the tutors who can interpret student work in context and apply professional standards.
- 10.2. **Assessment design that circumvents the use of AI.** Staff should design assessments to focus on authenticity, creativity, credibility and academic rigour. Tasks should be aligned with learning outcomes and emphasise skills and applications that are difficult for AI to replicate, such as critical analysis, personal reflection, live performance, collaborative problem-solving or interpretation of unique data. Assessments could offer a balanced mix of synchronous (real-time) and asynchronous components and avoid an over-reliance on coursework tasks that are vulnerable to AI misuse.

11. AI-Generated Formative and Summative Feedback

Generative AI (Microsoft Co-Pilot) may assist tutors by drafting qualitative comments that align with assessment rubrics and criteria; however, such use demands strict safeguards to protect academic integrity, fairness and data privacy. When generating formative or summative feedback, staff must adhere to the following requirements:

- **Retention of human judgement:** AI-generated feedback is never a final product. Human reviewers must evaluate AI suggestions, edit them for accuracy, tone and relevance, and ensure that they reflect the specific performance of the student. AI cannot replicate professional judgement and should not be relied upon to make evaluative determinations. Staff remain fully accountable for the feedback they provide to students.
- **Alignment with rubrics and criteria:** Prompts used to generate feedback must explicitly reference the assessment rubric and learning outcomes so that AI outputs relate to the criteria being assessed. Tutors should design prompts that elicit constructive, criterion aligned comments and discourage generic or nonspecific language. AI generated feedback should emphasise strengths, areas for improvement and actionable next steps, always in the context of the rubric.
- **Accuracy and accountability:** AI tools may produce plausible but incorrect statements. Staff must check every AI drafted comment against the student's work and correct any inaccuracies. Feedback should be evidence based and cite specific aspects of the student's performance.
- **Avoidance of bias:** As AI systems can amplify existing prejudices, staff must scrutinise AI generated feedback for potential bias or discriminatory language. Comments should be inclusive, equitable and sensitive to individual learning needs. Staff should edit or discard AI outputs that perpetuate stereotypes or unfair assumptions.
- **Prompt engineering and disclosure:** Tutors should experiment with different prompts to elicit useful feedback, and they should document the prompts used. Where AI contributes substantially to feedback, staff should disclose to colleagues or line managers that AI assistance was used, ensuring transparency and accountability
- **Consistency with assessment policies:** AI assisted feedback must reflect and reinforce academic integrity policies and must not contravene the prohibition on using AI to mark the work.
- **Bespoke feedback.** Tutors should ensure that feedback to students is still bespoke, individual, diversified and rigorous when drafted or refined by generative AI.

12. Use of AI for Assessment Summarising Student Feedback

AI can be a helpful tool for synthesising large volumes of qualitative data, such as student feedback or programme evaluation comments, but it must be used under strict conditions:

- **Summarising, not evaluating.** AI may be used to summarise qualitative student comments but must not be used to generate evaluative statements about teaching effectiveness or actions for course development action plans. Judgements, opinions and conclusions must rely solely on human insight and discernment. AI generated summaries serve as one input for reviewers, not a final or whole evaluator process.
- **Anonymisation of data.** Only anonymised comments may be entered into AI tools. Reviewers must remove any personally identifiable information from student feedback before using AI and must comply with data classifications and privacy obligations.
- **Use of approved tools.** Italia Conti requires the use of Microsoft Copilot as the platform for summarising qualitative feedback because it ensures security and confidentiality and does not use data to train models.

13. Accountability and Responsibility

- 13.1. Italia Conti recognises that artificial intelligence can support decision making and enhance operational efficiency, but it must never be allowed to obscure human accountability or undermine professional or ethical standards. Responsibility for any action, decision, or communication remains with the individual or department using AI.
- 13.2. Staff must ensure that AI is used in accordance with institutional policies, legal requirements, and ethical standards. They are accountable for verifying the accuracy and appropriateness of AI outputs before they inform any decision.
- 13.3. Staff must record how AI has influenced decisions and be prepared to explain those decisions to affected parties. Transparency extends to disclosing significant AI contributions to communications, teaching materials, or assessments, so that accountability is clear and potential errors can be traced and rectified.
- 13.4. AI must be treated as a tool that informs human judgement rather than replaces it. Decisions that affect individuals' rights or wellbeing, such as admissions, grading, disciplinary actions, performance evaluations or resource allocation, must be made by authorised staff who critically assess AI recommendations

- 13.5. The institution will establish processes for reporting concerns about AI use, investigating potential misuse, and implementing corrective actions.
- 13.6. Italia Conti ensures that AI is used responsibly, transparently and in ways that enhance human decision making rather than diminish it.
- 13.7. The institution reaffirms that AI does not absolve individuals or departments from responsibility; rather, it magnifies the need for diligence, critical judgement, and ethical reflection in all AI enabled activities.

14. Reporting Concerns and Misuse

- 14.1. Italia Conti encourages an open culture in which staff, students, contractors and visitors can raise concerns about artificial intelligence without fear of reprisal. Prompt reporting of suspected misuse, breaches of policy, ethical issues or unintended consequences is essential to maintain the integrity and safety of AI tools.
- 14.2. Reports should be made as soon as concerns arise and should include sufficient detail to allow the matter to be investigated.
- 14.3. Examples of reportable issues include disclosure of sensitive data to unapproved AI systems, discriminatory or biased outputs, unauthorised use of AI to make or inform high stakes decisions, use of unapproved tools, attempts to circumvent data protection measures, and any incident that could harm individuals or the institution.
- 14.4. AI tools must not be used to bully, harass, humiliate, intimidate, threaten, impersonate, defame or target another person or group. This includes the creation, manipulation or sharing of AI-generated text, images, audio, video, deepfakes, voice clones or other synthetic content intended to cause harm, distress, embarrassment, exclusion or reputational damage.
- 14.5. Any such misuse may constitute a breach of the relevant Student and/or Staff Code of Conduct and may lead to disciplinary action under the relevant policy, including but not limited to the Disciplinary Policy and/or the Harassment, Sexual Misconduct and Violence Policy.

15. Reporting Channels

Individuals may choose from several reporting routes, depending on the nature of the concern and their role;

- **Line Manager:** Concerns about day-to-day use of AI in teaching, research or administration should be raised with the relevant line manager, who will

determine whether the matter should be escalated to a senior manager or committee.

- **AI Steering Group:** Formal concerns about the design, deployment or impact of AI systems should be referred to the AI Steering Group
- **Academic Quality Board:** Staff and students should report concerns about AI use in student work, teaching or assessment to the Academic Quality Board.
- **IT and Data Protection Teams:** If the issue involves data privacy, security or use of unapproved tools, it must be reported immediately to the IT Services Department and the Data Protection Officer. Staff must not attempt to resolve data breaches themselves; expert intervention and evaluation is required.
- **Whistleblowing:** Italia Conti provide an anonymous reporting channel (speakup@italiaconti.co.uk) for individuals who wish to report concerns confidentially.

16. Investigation and Resolution

- 16.1. Upon receiving a report, the responsible officer will acknowledge receipt and undertake a preliminary assessment to determine whether the matter falls within the scope of the AI policy. If so, an investigation will be conducted, which may involve the AI Steering Group, Data Protection Officer, HR, Academic Quality Board or other relevant departments. The investigation will ascertain the facts, evaluate the risk, and recommend corrective actions.
- 16.2. Investigations will be carried out promptly, impartially and confidentially, consistent with fair procedures. The complainant and any affected parties will be informed of the outcome, subject to data protection and confidentiality constraints. Where an investigation confirms misuse or policy violation, the institution will take appropriate remedial and disciplinary action in accordance with existing procedures (e.g., staff or student disciplinary codes).

17. External Reporting and Escalation

In cases where AI use may have legal implications (for example, violations of data protection law, discrimination law or intellectual property law), the Data Protection Officer or nominated SLT member will determine whether an external report is required to regulatory authorities. Institutional obligations under the UK GDPR, may necessitate notification to the Information Commissioner's Office and will be handled in line with the Data Protection Policy.

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