

## 1. PURPOSE

To guide the ethical and responsible use of artificial intelligence (AI) at Holmesglen for operational purposes including teaching, learning and business functions.

## 2. SCOPE

Applies to all learners and employees.

This policy does not apply to applied research projects and outputs. Research approvals and ethics clearances are governed by the Research Policy.

## 3. POLICY STATEMENT

Holmesglen recognises the opportunities and challenges presented by AI and is committed to its ethical and responsible use. In alignment with our Vision 2030, we support the use of AI to improve the efficiency, effectiveness and experience of our administrative, business, teaching, learning and support activities.

Holmesglen acknowledges that ethical and responsible use of AI is achieving a balance between improvement and efficiencies, managing and mitigating risks to Holmesglen and its community and ensuring access and equity is maintained. Our employees and learners are supported to ensure that their use of AI is ethical, reliable, transparent, secure and skilful, and complies with applicable laws and regulations.

## 4. PRINCIPLES

### General principles

- 4.1. Holmesglen follows the *National Framework for the Assurance of Artificial Intelligence in Government* and relevant Victorian Government policy. We also embed *Australia's AI Ethics Principles* in its governance and management of AI use at Holmesglen.
- 4.2. Holmesglen regularly reviews, adapts and updates its policies, processes, decision-making and accountability structures, systems and risk management framework to ensure the effective governance of AI. We recognise that a combination of technical, people, educational, legal and leadership capabilities is required to achieve this, which requires the involvement of multiple business functions.
- 4.3. AI is used at Holmesglen to support teaching, learning and business functions and activities, including but not limited to:
  - a) making operations more efficient
  - b) identifying trends, issues, risks and opportunities or improving controls
  - c) responding to requests for information
  - d) protecting Holmesglen's physical and digital resources
  - e) highlighting potential academic misconduct
  - f) providing feedback, support or resources to learners
  - g) identifying learners who may benefit from support to improve their learning
  - h) improving the experiences and/or capabilities of Holmesglen learners and employees
  - i) recommending optimal allocation of campus facilities and reducing environmental impacts of our operations
  - j) marketing and recruitment activities, including assisting with selection processes and personalisation of content.

- 4.4. Holmesglen prioritises human-centred AI and uses AI tools to augment human capabilities. It does not use AI applications to make decisions about people.
- 4.5. Holmesglen ensures relevant employees maintain accountability for the outcomes and oversight of AI applications and documents these in its policies, procedures and guidelines.
- 4.6. Holmesglen informs individuals when they are engaging with AI applications to automate a function or process. Privacy and/or AI use disclosure notices include access and review mechanisms.
- 4.7. Holmesglen considers the equity, access and inclusion implications in endorsing the use of AI in its operations. This includes the potential for algorithmic bias and barriers to equitable access for employees and learners, regardless of abilities or access to resources. We ensure that the use of AI at Holmesglen does not discriminate against individuals or groups or impact social inclusion, fairness and impartiality.
- 4.8. Holmesglen applies a climate change lens to its use of AI, acts to minimise the environmental footprint of AI and assesses the environmental impact of AI operations within the Institute.
- 4.9. Holmesglen's ethical standards for the use of AI in teaching and learning are consistent with the use of AI in our business and administrative functions to ensure consistency across the Institute.

#### **Employee and learner use**

- 4.10. Use of AI must comply with Holmesglen's Information Security Policy, Privacy Policy, ICT Acceptable Use Policy and Code of Conduct.
- 4.11. Holmesglen provides guidelines to support learners and employees use AI tools appropriately. Appendix 1 contains general guidelines on AI use at Holmesglen.
- 4.12. Holmesglen supports our employees and learners to be skilful and ethical in their use of AI. We provide professional development and training in using AI in learning, assessment and workplace contexts and embed ethical considerations in programs and resources to foster informed and responsible AI use. Our capability development initiatives aim to balance maximising the potential of the technology, while making sure users fully understand how it works and the potential risks.
- 4.13. Use of Generative AI (Gen-AI) in academic contexts (eg assessment and learning activities) must follow Holmesglen's Academic Integrity Policy and Generative Artificial Intelligence Guidelines.
- 4.14. Breaches of this policy are to be reported and managed in line with the Code of Conduct and relevant conduct and discipline policies.

#### **Procurement, development and integration of AI**

- 4.15. Procurement, development and integration of AI applications require additional approval prior to implementing requirements under the Financial Management Rule, Procurement and Tendering Rule and Asset Management Rule and associated policies and procedures. This ensures that organisational and individual risks specifically related to AI use are identified, assessed and managed prior to implementation or integration.
- 4.16. Holmesglen assesses proposals to procure, develop or integrate AI applications and implements risk-based decision-making that:
  - a) recognises a continuum of risk exists depending on the functionality and autonomy of the application and its impact on individuals and their rights that requires proportionate risk controls and treatments
  - b) ensures the primary purpose of an AI application is clearly identified and a legitimate business or educational need exists for its use
  - c) clearly identifies accountabilities for communications, training, development, deployment, monitoring, review, reporting and oversight

- d) ensures users are informed of the purpose, scope, limitations and methodologies that underpin the technology
  - e) assures applications are auditable and traceable to track and report impact
  - f) complies with privacy and data protection obligations when personal information is used to train an AI model, is captured in an AI application or AI is used to infer information about individuals.
- 4.17. Ethical principles for the use of AI are applied at each stage of the system lifecycle including, design, data and modelling, verification and validation, deployment, operation, monitoring and retirement/decommissioning.
- 4.18. Holmesglen may restrict access to Generative AI (Gen-AI) applications from Institute supplied ICT resources where information security, privacy, intellectual property, equity and/or integrity risks are identified, including acting on guidance issued by government agencies and regulatory bodies.
- 4.19. Holmesglen monitors the use of AI applications by employees and learners to ensure harm and misuse is avoided wherever possible.

## 5. ACCOUNTABILITIES

Action	Accountability
<p>Approve this policy and oversee its implementation.</p> <p>Establish and chair the AI Governance Committee.</p> <p>Report to the Board on the effectiveness of AI governance and risk management in Institute operations.</p>	Chief Executive
<p>Develop institutional knowledge and insights about the use, management and control of AI in teaching, learning and business operations.</p> <p>Assess and evaluate the impact of AI applications on employees, learners and communities in general.</p> <p>Monitor the review, adaption and update to policies, procedures and systems to reflect emerging developments in AI and current organisational maturity.</p> <p>Monitor operational risks related to AI use.</p>	AI Governance Committee
<p>Monitor award integrity risks and the implementation of Generative AI action plans relating to teaching, learning and applied research.</p>	Council of Education and Applied Research
<p>Ensure policies, procedures and guidelines related to teaching, learning and applied research are reviewed and maintained for AI use.</p> <p>Report to the Council of Education and Applied Research on AI risk management related to teaching, learning and applied research.</p> <p>Oversee the development, implementation, monitoring and review of Generative AI action plans relating to teaching, learning and applied research.</p> <p>Ensure learners are informed and supported in the ethical and responsible use of AI.</p>	Executive Director Education and Applied Research
<p>Ensure the Institute's Capability Framework and its implementation supports employees to use AI safely, ethically and responsibly, while promoting the innovation potential of AI to enhance work and learning.</p>	Executive Director People, Global Relations and

Action	Accountability
<p>Support information asset owners and/or custodians to assess information security, intellectual property and privacy risks of proposed AI applications.</p> <p>Approve the use of AI as part of an identified business activity or technology solution before the procurement, development and/or integration of AI applications.</p> <p>Respond to high-risk AI system procurement or development by engaging or establishing external or internal review bodies, advisory bodies or AI risk committees as relevant.</p>	Chief Information Officer
<p>Obtain approval from the CIO for the procurement, development or integration of AI applications prior to implementing procurement and asset management procedures in accordance with financial delegations.</p> <p>Conduct a privacy impact assessment to inform the procurement, development or integration of AI applications and regularly update these as the scope, risks, purpose, context and nature of the AI technology changes.</p> <p>Ensure the ongoing management, governance and monitoring of AI in systems once implemented.</p>	Information asset custodians in consultation with Technology Services Department and information asset owners and stewards as appropriate
<p>Develop and maintain knowledge and skills in the ethical and responsible use of AI.</p> <p>Ensure information entered and outputs of AI applications preserves privacy, intellectual property and information security. Where commercial Generative AI tools are used, ensure personal and corporate confidential information is not input and that outputs maintain Holmesglen's intellectual property rights.</p> <p>Check the accuracy of AI outputs prior to use.</p> <p>Identify AI influenced or generated outputs and explain these to end users.</p>	All employees and learners

## 6. DEFINITIONS

Term	Meaning
Artificial Intelligence (AI) system	Holmesglen uses the OECD definition (revised November 2023) of AI as a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment.
Generative Artificial Intelligence (Gen-AI)	The creation of content across a wide range of mediums, including text, images, music and programming code, based on instructions or prompts provided by a user and informed by large datasets.
Public AI tools	An AI tool available publicly either as a free service or by subscription. Public tools include applications like ChatGPT, Gemini, DALL-E, Jasper, Copy.ai, Grammarly and Microsoft Copilot etc.

## 7. CONTEXT AND/OR REFERENCED DOCUMENTS

### Internal

Academic Integrity Policy  
Asset Management Rule  
Code of Conduct  
Generative Artificial Intelligence Guidelines  
Financial Management Rule  
ICT Acceptable Use Policy  
Information Security Policy  
Privacy Policy  
Procurement and Tendering Rule  
Research Policy  
Risk Management Rule

### External

National Framework for the Assurance of Artificial Intelligence in Government (2024)  
Australia's Artificial Intelligence Ethics Framework (2019)

## 8. REVIEW

- 8.1 This policy must be reviewed no later than three years from the date of approval.
- 8.2 The policy will remain in force until such time as it has been reviewed and re-approved or rescinded. The policy may be withdrawn or amended as part of continuous improvement prior to the scheduled review date.

## 9. VERSION HISTORY

Version Number	Date	Summary of changes
1	August 2024	New policy

## Appendix 1: Generative AI use guidelines

Would you stand up in the cafeteria and shout about your students' performance or confidential information about your team members? Of course not! But uploading content to a public Gen-AI tool or chatbot means that you might do something similar.

Ever asked ChatGPT to respond to an email by copying and pasting the original email into the prompt? How about asking it to write a message announcing some internal matter to your department? Now imagine someone at another Institute asks ChatGPT to "summarise current student complaints at Holmesglen" and your name, the name of one of your students and all the details of a complaint they made are included in the output.

The morale of this story – follow the **six rules for AI use at Holmesglen**:<sup>1</sup>

1. **Keep information safe:** Don't enter, copy/paste or upload any confidential, personal or sensitive details or non-public information about Holmesglen, our learners or employees into public AI tools.
2. **Double-check:** Don't trust anything AI tools say without checking if it's correct.
3. **Be honest:** Let people know when you're using AI and explain how it's being used.
4. **Know the rules:** Check if there are any rules or conditions about using AI (eg from funding arrangements, licenses, contracts or service agreements)
5. **Report problems:** Tell [cyber.security@holmesglen.edu.au](mailto:cyber.security@holmesglen.edu.au) if you notice any security or privacy issues.
6. **Follow specific guidelines:** Stick to any additional guidelines about using AI specific to your work.

### Gen-AI do's and don'ts

Do	Don't
<ul style="list-style-type: none"><li>▪ <b>Only input publicly available content</b> into Gen-AI tools, unless using a tool authorised or customised by Holmesglen for secure and internal use.</li><li>▪ If you need to provide context or examples in your prompt, to safeguard privacy and security:<ul style="list-style-type: none"><li>– Use generic terms or placeholders eg [student name], not personal details</li><li>– Generalise scenarios – frame your prompt in broad or hypothetical context rather than detailing specific, real-life situations</li><li>– Include concepts, ideas or general information (eg historical facts, general knowledge) instead of specific data</li><li>– Exclude sensitive data – never include non-public information about Holmesglen or any confidential or sensitive data</li><li>– Anonymise – if using case-studies or examples, replace specific details with generalised descriptions or fictional names</li></ul></li><li>▪ Ensure information or prompts entered in Gen-AI tools are accurate and without biases (eg gender, cultural biases or stereotypes)</li></ul>	<ul style="list-style-type: none"><li>▪ Enter any content in prompts that shouldn't be in the public domain, including information that:<ul style="list-style-type: none"><li>– is confidential or sensitive</li><li>– is personal information (including health information)</li><li>– may breach another person's intellectual property rights</li></ul></li><li>▪ Rely on Gen-AI as the only input to your work (it is just one input). It should not replace your own research, analysis and content development</li><li>▪ Trust that the information provided is unbiased or accurate</li><li>▪ Use Gen-AI tools for complex or sensitive queries where local context and nuance is critical</li><li>▪ Ask these tools to answer a question you cannot independently validate the answer to –you need the required knowledge to decide whether it can be trusted or contains bias</li><li>▪ Copy and paste sections of Gen-AI content into your work without consideration of what your obligations are in relation to attribution and intellectual property</li></ul>

<sup>1</sup> Adapted from University of Sydney, AI Guardrails, in Liu, D and Bridgeman, A. *Frequently asked questions about generative AI at Sydney*. University of Sydney. Retrieved August 19, 2024, from <https://educational-innovation.sydney.edu.au/teaching@sydney/frequently-asked-questions-about-generative-ai-at-sydney/>

<sup>2</sup> Adapted from Victorian Department of Government Services, *Draft Gen-AI Policy* and Eager, B. *Responsible use of AI Chatbots: Data Upload Guidelines for Academic Researchers*. Retrieved 19 August 2024, from <https://broneager.com/responsible-use-of-ai-chatbots>

Do	Don't
<ul style="list-style-type: none"> <li>▪ Critically assess all AI-generated outputs and validate their quality and accuracy with other sources</li> <li>▪ Be ethical and transparent about the use of these tools and attribute where Gen-AI outputs have contributed to content</li> <li>▪ Maintain a record of the Gen-AI generated content where it is incorporated into official Holmesglen documents</li> <li>▪ Use privacy-enhancing options in tools where available. For example, ChatGPT allows users to opt out of their data being used to train the vendor's model</li> </ul>	<ul style="list-style-type: none"> <li>▪ Create AI content for distribution which incorporates copyrighted material without permission from the owner.</li> <li>▪ Upload student work without their permission.</li> </ul>

### Public Gen-AI use scenarios

Follow the six core rules to make sure your use is appropriate. Always use Gen-AI as a tool to enhance what you do, not as a replacement for your own expertise or critical thinking.

Appropriate use examples	Inappropriate use examples
<ul style="list-style-type: none"> <li>▪ Brainstorm ideas</li> <li>▪ Research a topic you are familiar with – and then fact check with reliable sources before being relied upon</li> <li>▪ Ask for explanation of complex concepts as a starting point for deeper research – not as sole source of information</li> <li>▪ Summarise or analyse a large public domain document into several dot points or paragraphs</li> <li>▪ Simulate question and answer sessions for an upcoming presentation or develop a list of FAQs for general or generic topics or from publicly available content</li> <li>▪ Help lesson plan or develop assessment rubrics for learning topics or against publicly available standards (eg units of competency)</li> <li>▪ Refine generic content to make it clearer or more suitable for a particular audience or context</li> <li>▪ Suggest an alternative phrasing, check grammar etc</li> <li>▪ Identify potential sources of information, models or approaches that may be useful to apply to a situation</li> <li>▪ Develop generic source code</li> </ul>	<ul style="list-style-type: none"> <li>▪ Copy and paste an email and asking the tool to write a response</li> <li>▪ Upload a spreadsheet with personal information and ask the tool to identify data trends</li> <li>▪ Critique, analyse or summarise a draft official document that has not been released to the public</li> <li>▪ Translate an email or confidential document from another language</li> <li>▪ Superimpose people into a photo or video</li> <li>▪ Debug proprietary source code</li> <li>▪ Upload a student's assessment without their permission</li> <li>▪ Make assessment decisions</li> <li>▪ Upload handwritten notes of a meeting that identifies people or Holmesglen proprietary information</li> <li>▪ Upload a WebEx/Teams etc recording and create a summary of the meeting (you can do this within WebEx or other application if AI tools have been integrated).</li> <li>▪ Upload photos or videos of people without their permission and create new content</li> </ul>