

AI Governance Policy

1. Purpose and scope

- 1.1. This policy sets out the ethical principles that govern the use of artificial intelligence (AI) across Queen Mary's research, education and administrative activities. It provides the University-wide foundation for existing Queen Mary guidance and establishes the principles and minimum expectations that apply across the University.
- 1.2. This policy applies to all staff and students across all faculties, schools and professional services.
- 1.3. Responsibilities under this policy should be applied according to an individual's or team's role in selecting, developing, managing or using an AI-enabled system. Individual users are responsible for how they use and rely on AI outputs, while responsibility for the design, performance and governance of institutional systems sits with the relevant system or service owner.
- 1.4. This policy supports the implementation of Queen Mary's AI Strategy by establishing the common principles within which AI priorities, investments and activities will be developed and delivered.
- 1.5. These are University-wide principles. They provide a common foundation but are not intended to operate as a uniform, one-size-fits-all framework. Faculties, schools, institutes, departments and directorates should apply them in ways that reflect their particular activities, disciplines, regulatory environments and student and staff populations.
- 1.6. For example, a biomedical research team working with patient data, a humanities department exploring generative AI as a creative tool and a professional services function automating administrative workflows will each need different local procedures. However, those procedures should be consistent with the same seven principles.
- 1.7. Faculties, schools, institutes and professional services directorates may determine how the principles are applied in their own settings, provided their arrangements are consistent with this policy and any University-wide AI standards. Local arrangements must comply with applicable laws, University policies and mandatory institutional safeguards.

- 1.8. This policy applies to all uses of AI—generative and non-generative—whether provided or approved by Queen Mary or used independently, across research, teaching, learning, assessment and professional services.

2. Relationship to existing policies, guidance and legal obligations

- 2.1. This policy complements, and must be read alongside, existing Queen Mary policies, procedures, guidance, legal obligations and regulatory requirements, including those relating to academic integrity, data protection, intellectual property, information security, equality, procurement, employment and research governance. It does not replace or override those requirements, but provides the University-wide principles through which AI use should be interpreted and governed.
- 2.2. Operational requirements for proposing, approving, procuring, developing and managing AI-enabled systems are set out in the relevant Queen Mary policies and supporting guidance. Any proposed exception to established governance, software, data protection, information security or procurement requirements must be considered through the relevant University exception, risk or governance process and escalated where appropriate.
- 2.3. Where existing policy or guidance is silent or ambiguous on the use of AI, the principles in Section 3 should be applied directly.

3. Governing Principles

3.1. Accountability

- a) Individuals and teams remain accountable for how they use, manage or rely on AI, in accordance with their role and level of control. This responsibility cannot be transferred to, shared with, or diminished by the AI system involved. AI cannot be an author and cannot bear responsibility for errors or harms.
- b) Examples in practice:
- Education: Where AI is used for educational purposes, individuals and programme teams are accountable for decisions informed by AI and for ensuring that any outputs used in teaching, learning, assessment or student support are accurate, appropriate to the context, and aligned with intended educational objectives.
 - Example: A lecturer uses an AI tool to develop feedback comments on a set of student assignments. Before releasing the feedback, the lecturer reviews and

edits the AI-generated comments to ensure they are accurate, aligned with the assessment criteria, and appropriate to the individual student's work. The lecturer remains accountable for evaluating the student work, and the final feedback provided to students.

- Research: A post-doctoral researcher, who is assigned the task of data analysis, uses LLM-generated code to analyse a large quantity of experimental data. They check the code and analysis results to verify accuracy, while the principal investigator double checks the verification before publication and confirms that appropriate human review has occurred.
- Operations: Where an institutional AI system is used, individual users are accountable for how they use and rely on its outputs, while the relevant system or service owner is responsible for its design, performance and governance.

3.2. **Transparency and Honesty**

- a) Substantive use of AI must be disclosed with sufficient information to explain how it materially contributed to the work or decision. The level of detail required should reflect the nature of the use, the context in which it occurred and the information reasonably available to the person concerned. Undisclosed substantive AI use that misreports the origin of work is a matter of academic and research integrity. The origin of intellectual content must never be misrepresented. AI-generated analysis, text, or hypotheses (or any other substantive use) must not be presented as original human contributions without disclosure.
- b) Examples in practice:
 - Education: A student uses AI to support aspects of an Amber or Green assessment task in accordance with the relevant assessment requirements. They complete an AI use declaration form identifying the tools used, how they were used, and the extent of their contribution to the final submission.
 - Education: An educator who uses AI to generate elements of a case study or learning resource should indicate the role AI played in creating the material and remains responsible for its accuracy, quality and suitability for students.
 - Research: A research team uses an LLM to identify and extract themes in interview transcripts as a step in developing a conference paper. The methods section of the resulting article identifies the AI tool used, the model version, and nature of the task completed by it, alongside an explanation of how members of the team reviewed and incorporated the model's suggested themes.

- Operations: Where AI materially contributes to an operational output (e.g. a committee paper, correspondence, administrative outcome), its involvement must be appropriately recorded or communicated.

3.3. **Data, Confidentiality and Intellectual Property**

- a) AI must be used in ways that protect personal, confidential and commercially sensitive information, and the intellectual property of Queen Mary and others. Where Queen Mary data is used to train, test, configure or evaluate an AI system, this must be authorised by the relevant data owner and comply with data protection, information security, research governance, contractual and intellectual property requirements. Sensitive, confidential or personal data must be anonymised, de-identified or otherwise protected where required.
- b) Examples in practice:
 - Education: Educational data (eg. student assessment work) must not be used to train, test, configure or evaluate an AI system without authorisation from the relevant data owner and compliance with data protection, information governance and other applicable requirements.
 - Example: An educator wishing to analyse and visualise National Student Survey (NSS) data for their programme must not upload quantitative or qualitative survey data to an AI tool that has not been approved for that purpose.
 - Research: A faculty member agrees to review a conference paper for a department colleague. Rather than using an LLM to assist with the review, they do not upload the unpublished manuscript, extracts, or confidential review comments to an AI platform to protect confidentiality and the authors' intellectual property.
 - Operations: If using Queen Mary data to test, develop or deploy processes through AI systems, seek explicit permission of the data owner and ensure compliance with University Data Protection Policy before handling the data.

3.4. **Rigour and Development**

- a) AI-assisted work must meet the same standards of quality, accuracy and rigour as work carried out without AI, including standards of reproducibility where relevant. Users must apply appropriate checking, challenge, critique and confirmation before relying on AI-assisted work, sharing it with others or using it to inform decisions. AI should support, rather than replace, the development and use of knowledge, skills, critical thinking and independent judgement by researchers, staff and students.

b) Examples in practice:

- Education: AI-assisted teaching, learning and assessment activities must meet the same standards of quality, accuracy and academic rigour as those undertaken without AI. Users should critically evaluate and verify AI outputs before relying on them and should use AI in ways that support, rather than replace, the development of subject knowledge, disciplinary skills, critical thinking and independent judgement.
- Example: A lecturer uses AI to help generate examples and learning activities for a teaching session. Before use, they review the content for accuracy, relevance and inclusivity, make any necessary amendments, and align it with the intended learning outcomes. Professional and pedagogic judgement remain central to the design of the learning experience.
- Research: A doctoral researcher reads and critically synthesises the literature for their dissertation before using an AI platform to sense-check their draft for gaps or inconsistencies, evaluating any suggestions against the original sources. Their supervisor asks them to explain their interpretation of key sources and justify which AI-generated suggestions they accepted or rejected, keeping independent understanding and scholarly judgement central to the process.
- Operations: Staff must check, challenge and confirm AI-assisted work before sharing it or using it to inform an operational decision.

3.5. **Equity and Inclusion**

- a) AI must be used in ways that guard against and minimise the reproduction or amplification of discrimination, harm or bias in outputs affecting students, staff, research participants or the communities Queen Mary serves. AI systems are trained on data that may reflect existing and historical inequality, prejudice and under-representation. Although bias-mitigation measures can reduce these risks, they cannot eliminate them completely. AI systems must therefore be used with appropriate scrutiny and care.
- b) Responsibility for identifying and mitigating bias remains with the individuals and teams deploying or relying on AI systems. The existence of bias within an AI system does not reduce human accountability for decisions or outcomes arising from its use. Where AI materially informs a decision affecting an individual, an appropriate human owner must be able to explain, review and, where necessary, challenge the decision or output.
- c) Queen Mary will consider who has access to the tools, training and infrastructure needed to use AI responsibly. The University will seek to provide equitable access according to need, while recognising that the provision

required may differ across disciplines, roles and activities.

d) Examples in practice:

- Education: AI should be used in ways that promote equitable, inclusive and accessible learning experiences. Educators should critically evaluate AI outputs for potential bias, stereotyping, under-representation or other forms of unfairness and should not rely on AI-generated recommendations without appropriate human review and judgement. Consideration should also be given to ensuring that students have equitable access to the tools, support and guidance required to engage with AI-enabled learning and assessment activities.
- Example: A lecturer uses AI to help develop case studies and teaching materials for a module. Before using the content, they review it for potential bias, stereotypes, cultural assumptions and gaps in representation, making revisions where necessary to ensure that the materials reflect diverse perspectives and provide an inclusive learning experience. The lecturer remains responsible for the final educational content and its suitability for students.
- Research: A research team uses an LLM to suggest sources for the literature discovery task of a research project and checks whether its recommendations overlook relevant non-English scholarship or research from the Global South. The team then supplements the suggestions through independent searches to avoid reinforcing a narrow or unrepresentative evidence base.
- Operations: Where AI materially informs a decision affecting a student or member of staff, an appropriate and named human owner must be accountable and able to explain, review and challenge the decision or output.

3.6. Sustainability

- a) AI should be used only where it is appropriate and adds sufficient value. Individuals and teams should consider the potential social and environmental impacts of their use of AI and avoid unnecessary or disproportionate use, particularly where it requires significant computational resources. Queen Mary will also consider sustainability when procuring, developing and approving AI systems and services.

b) Examples in practice:

- Education: AI may be used in education where it supports teaching, learning, assessment or student support in ways that provide clear educational benefit. Educators and students should consider whether AI is the most appropriate tool for the task, avoid unnecessary use, and make proportionate choices that balance educational value with the potential social and environmental impacts

of AI technologies.

- **Example:** An educator is designing lecture materials and considers using AI to generate images and videos to enhance engagement and learning. Ultimately, they decide to use AI only where it adds clear educational value, while drawing on existing resources and professional expertise where these are sufficient. This ensures that AI is used purposefully and proportionately, rather than by default, and helps to minimise the environmental impact associated with its use.
- **Research:** A research team considers hundreds of training runs on a large GPU cluster to improve a large image-classification model's benchmark accuracy from 95.0% to 95.1%, without evidence that the gain would be meaningful beyond noise and improve any practical application. After calculating the potential compute cost, it decides that the limited public-interest benefit does not justify the environmental cost and instead conducts a smaller, targeted set of experiments.
- **Operations:** Sustainability should be considered when Queen Mary procures, develops or approves AI systems and services. Appropriate use of AI tools for personal productivity and other delivery should be considered when making tools available for staff to use.

3.7. **Proportionality**

- a) Governance controls and documentation requirements should be calibrated to the risk posed by a particular AI use rather than applied uniformly. Low-risk, everyday uses should not carry the same governance burden as high-risk or high-stakes applications. The assessment should consider three factors: the scale, scope and likelihood of potential adverse impacts; whether the AI system plays a core, decision- or content-shaping role or a peripheral, assistive role; and the vulnerability of those affected, including whether they are in positions of heightened dependence, marginalisation or exposure to harm. It should also take account of risks identified through University policies, institutional risk processes, regulatory requirements and professional standards.
- b) Examples in practice:
 - **Education:** An educator uses AI to generate discussion points for a seminar. As the AI is being used in a low-risk, assistive role and the content is reviewed by the lecturer before use, only proportionate oversight is required. By contrast, where AI is used within assessment or to inform marking or grading processes, the potential risks and consequences are greater and therefore require enhanced governance, transparency and human oversight.
 - **Research:** A research group applies lightweight checks to the LLM-assisted

formatting of a bibliography, but requires detailed methodological documentation, independent validation, and ethics scrutiny when the use of an AI platform substantively informs the analysis of sensitive participant data, which includes data collected from research subjects who are members of a historically marginalised demographic group. The difference in governance approaches reflects the system's role in shaping findings, the potential harms, and the vulnerability of participants.

- Operations: A low-risk, everyday use should not require the same governance and documentation as an AI system that materially informs decisions affecting students or staff

4. Applying the Principles Proportionately and Locally

- 4.1. These principles are horizontal by design: every faculty, school, department, and professional services directorate is expected to interpret and apply them to its own context, rather than treating them as a fixed checklist to be applied identically everywhere. Local implementation should specify, for the activities most common in that context, what disclosure looks like in practice and what level of documentation and oversight is proportionate.
- 4.2. Contextual adaptation may specify and strengthen local requirements; it may not reduce protections or displace requirements arising from University-wide policy, law, research ethics, data protection, information security, equality and accessibility, academic integrity, procurement, or employment policy.
- 4.3. The scope for local interpretation will vary across the University. In some Professional Services functions requirements may be more tightly prescribed by institutional policy, regulatory obligations, professional standards or approved enterprise systems. In these circumstances, University-wide or functional requirements take precedence over local interpretation.
- 4.4. Students and staff who have concerns about using AI should discuss these with their tutor, supervisor or line manager in the first instance. Concerns should be considered respectfully, with advice, support or referral to the relevant University team provided where appropriate.
- 4.5. Where uncertainty arises, individuals and teams should seek advice from the relevant AI champion, academic or service lead, policy owner or specialist University team, such as JRMO, ITS or the Queen Mary Academy.

5. Iterative Governance and Review

- 5.1. This policy, and the guidance that sits beneath it, are living documents. They will be reviewed and updated on a regular cycle to remain responsive to feedback from students and staff, technological change, emerging evidence, and evolving regulatory requirements.
- 5.2. This policy is owned by the AI Strategy Group and will be reviewed at least annually, with lighter-touch updates to supporting guidance made more frequently.
- 5.3. Iterative consultation and engagement with students and staff will be included in revision and updating processes. Local implementation arrangements should include accessible routes for reporting concerns about the accuracy, bias, performance or unintended impacts of AI systems and outputs.
- 5.4. Significant or recurring concerns should be escalated through the relevant University governance and risk processes. Ongoing feedback and proposals for revision may also be submitted through Faculty Research Committees, education governance structures, Professional Services leadership routes, Directors and policy owners, QMSU, the Ideas Forum, or directly to the JRMO and AI Strategy Group.

Policy information and document control

Policy title	AI Governance Policy
Version number	Version 1
Related policies and procedures	Other policies referenced in this policy can be found here on the website: www.qmul.ac.uk/policy
Superseded policies	None
Approval level	AI Strategy Group
Approval date	21 October 2026
Effective date	26 October 2026
Next review due	October 2027
Policy owner	AI Strategy Group
Policy contact	

Version control

Version	Date	Reason for updates/Summary of key changes
1	October 2026	New policy