

NORD ANGLIA AI POLICY

JUNE 2023

Policy Name: Nord Anglia Education AI Policy

Description: Guidance and instructions for all colleagues on using AI. This policy is **mandatory** for all colleagues and applies to AI tools.

Version	Amendments	Issue Date	Issued By
1.0	First version written and published	29 June 2023	MAC and IT

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OVERVIEW

AI tools offer teams new ways for working, by helping create, edit, translate and analyse content and information. As these technologies develop, it's important we learn how to best use them but it's essential we use them responsibly. Tomorrow's AI enabled students may very well graduate to a world where AI enabled research, authoring and decision making are key professional skills. In addition, AI can be an enabler to support decision making both in the educational context and also in the commercial running of our family of schools. Some education technology being used in schools has AI features, including OpenAI and ChatGPT.

While there are many free or 'freemium' AI tools, caution should be taken when using these as it is likely the data you input into these is being kept by the AI tool's owner and is being used to 'train' the AI. Free tools aren't limited to the large language models like ChatGPT and Bard; there are hundreds, with more being released every week.

When we're using AI tools, it's important we adopt a consistent approach to protecting information relating to our students, families, colleagues, schools, organisation and third parties. This policy – and in particular, the checklist below – sets out that approach.

<p>There are currently seven popular uses for AI tools. The top five are most applicable to Nord Anglia:</p> <ol style="list-style-type: none"> 1. Text 2. Video 3. Image 4. Speech 5. Research 6. Code 7. Analysis & Modelling 	<p>There are a number of risks that need to be managed when using AI. These include the following risks:</p> <ul style="list-style-type: none"> • Security • Privacy • Legal (including confidentiality/intellectual property) • Regulatory • Ethical <p>Content generated by AI can be unreliable due to bias, inaccuracies, and outdated information. Generative AI output may resemble copyright protected work.</p>
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SECURITY, PRIVACY, LEGAL & REGULATORY

There are **four data types** that we're prohibited from providing to free AI tools.

<p>Personally Identifiable Information ('PII') / Personal Data in relation to our students, their families, colleagues, or any person associated with us (e.g., names, addresses, ID numbers, location data, religion, health information, etc.). If you are unsure what is personal data, please contact the Compliance Team.</p>	<p>Company-owned confidential or business sensitive information (e.g., financial information, FTE or EVA data, forecasts, budgets, due diligence information, future plans, strategy, market reviews and reports commissioned by NAE, etc.)</p>
<p>School and organisation names (e.g., inputting our schools' names or Nord Anglia's into the tool, information that could be attributed/identifiable back to a particular school or Nord Anglia)</p>	<p>Third party-owned confidential information (e.g., any materials from or information about our collaborations with UNICEF, MIT and/or Juilliard, information received under a non-disclosure or confidentiality agreement with a third party, etc.)</p>

ETHICS, USER RESPONSIBILITY AND COMPLIANCE

- An overarching principle is that we must use AI responsibly and ethically. The Institute for Ethical AI in Education, which we co-funded, provides an ethical framework for use in education. Further information is available [here](#).
- When deciding to use AI tools to facilitate the work you do, remember that you are responsible and accountable for the content generated by those tools.
- This guidance complements existing obligations for all colleagues in Nord Anglia's existing [Data Protection](#), [Child Safeguarding](#), and [Acceptable Use](#) policies and the [Code of Conduct](#) – all of which are available [here](#). **We would strongly recommend** you review these documents again and the related training on these areas (which can be found on NAU [here](#)).
- All colleagues are expected to comply with this policy and report any concerns to their manager.

COMMERCIAL OR PAID AI TOOLS

When considering purchasing commercial AI tools, please ensure you follow the above policies and that Nord Anglia's procurement processes are followed, including use of a relevant IT supplier due diligence questionnaire, completing a Data Privacy Impact Assessment, and approval by the Regional IT Director or Group CTO.

FURTHER RESOURCES

The value of outputs from AI relies on the design of appropriate prompts and refinements; skills that can be developed. Users need to be familiar with these skills and should develop them to optimise outputs. There is a growing set of materials on the use of AI in NAU [here](#).

CHECKLIST: ALWAYS FOLLOW THESE STEPS WHEN USING FREE AI TOOLS AT WORK.

STEP 1 - *Before using the AI free tools, ask yourself:*

1. Is accessing this tool prohibited in the country in which I'm based? This could be due to it being prohibited by your local government and/or the tool's licence restricting use in a country (e.g. ChatGPT is prohibited in China and the licence does not authorise use in China).
2. Am I using my work email address to log in the AI tool for work purposes? (You **always** need to use your work email address)
3. Have I disabled chat history and model training in its data settings/controls section? This should **always** be done because it gives us additional protections if you accidentally input/provide prohibited data.
 - a. ChatGPT: to make sure you've done this, check the instructions [here](#)
 - b. Bard: to make sure you've done this, check the instructions [here](#)
 - c. Other AI tools: you are responsible for confirming and ensuring this is done.
4. If I'm inputting or providing any data / information into the AI tool, have I checked whether it's okay to provide or is it prohibited? See the four prohibited data types in the table above.
5. If I'm unsure whether something is prohibited data or information, would I be concerned if the inputted data / information was made publicly available and accessible by any member of the public?

If **YES**, then the information is most likely prohibited data and information and should not be inputted into the AI tool.

6. If I'm still unsure about the data /information after answering the 5 questions above, take these steps:
 - a. Check with your manager.
 - b. If you still need further guidance:
 - i. About Personal Data or PII, check with the [Compliance](#) Team.
 - ii. About company-owned or third-party owned confidential information, check with Legal (your regional or central team).

STEP 2 - After the AI tool generates the content, ask yourself:

1. Have I personally reviewed all of the content that has been generated to ensure its quality and accuracy?
2. Have I checked the list of sources/references from where the relevant content has been compiled/generated (you can ask the tool to do this if needed) and made a reasonable attempt to verify and validate the content (as accurate, as not copying someone else's work, etc.)?
3. Have I confirmed to my manager that I have followed this policy and has my manager signed it off?

Remember:

- These services should be used as tools to *facilitate* the work you already do – therefore, the content generated should be seen as a good “first draft” that you review, refine and ultimately finalise.
- Exercise discretion and reasonable fact-checking and verification of content generated by the AI tool. For example, ChatGPT's abilities are limited by the chatbot's own knowledge base and can just make up references, so this should be validated. The content generated can be biased depending on where it sources its information from.
- In the absence of a straightforward answer, some AI tools are primarily designed to be *predictive* (about the next likely word in a sequence) rather than accurate.

KEY POINTS TO REMEMBER

- If the data concerned is not something you would ever want to see published/disclosed subsequently, don't input it into a free AI tool.
- Never assume it's okay to publish content because it's been generated by AI. It may be partially or entirely inaccurate, or poorly written, or all of these.
- You've always got to apply the same standards, reviews and approvals for publishing content from AI tools that you would for content you've written.

COMPLIANCE WITH THIS POLICY

Procedures and policies outlined in this policy, and in any related policy, may be reviewed and changed at any time. Failure to comply with this policy may result in disciplinary action being taken.

ENDS