



AI Policy

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Policy Review

Version	Date	Change History	Reviewed By	Implementation Date:	Next Review Date
1	31/07/2025	Simplification and updated to better reflect roles and responsibilities and incorporating new policy lay-out	QD/BOD	01/08/2025	31/07/2026

1. Overview

Artificial Intelligence (AI) refers to the use of computer systems to perform tasks that typically require human intelligence, such as generating text, analysing data, making predictions, or interacting with users. Common examples include generative AI chatbots (e.g. ChatGPT, Gemini), automated marking tools, and image or code generators.

Professional Assessment Ltd (PAL) recognises that AI has the potential to enhance teaching, learning, qualification development, assessment, and administration. When used appropriately, AI tools can support greater efficiency,

consistency, and access to data-driven insight. However, they also introduce significant risks to assessment validity, authenticity, regulatory compliance, and ethical integrity, whether used by Learners, Centres, or PAL staff and contractors.

All AI use must be carefully controlled to ensure it supports, rather than undermines, the integrity of assessment.

Transparency is a core principle in PAL's approach: any use of AI must be clearly documented, traceable, communicated to relevant stakeholders (including Centres, regulators, and Learners/Apprentices where appropriate), and regularly reviewed. Final decisions that affect assessment design, marking, certification, or Centre risk ratings, if AI is used in any shape or format to determine or influence a decision must always be made by trained, qualified professionals, i.e. there will always be a human in the loop.

2. Policy Scope

The policy covers:

- AI in summative assessment
- AI in design and development of assessment instruments
- AI in marking, moderation, quality assurance, and data analysis
- AI in automating processes within PAL

This guidance should be read in conjunction with Professional Assessment Ltd (PAL's) Plagiarism, Cheating and Collusion policy, Maladministration and Malpractice Policy, Sanctions Policy, Adverse Effect Policy, Investigation Procedure and Data Protection and Privacy Policy.

3. Who is this Policy for?

This policy is for:

- All PAL personnel
- Contractors and partners (e.g. assessment developers, content providers).
- Centre Personnel to include Trainers, Assessors and Quality Assurance personnel
- Third Party Personnel to include Trainers, Assessors and Quality Assurance personnel
- Learners/Apprentices

Please note the term Assessors as used in this policy can apply to AO/EPA Assessors or Centre or Third Party Provider/College Assessors, all are subject to the content and principles of this policy, and both can face similar penalties and sanctions for poor practice in connection with the use of AI.

4. Purpose

The purpose of this policy is to describe PAL's approach to the deployment of AI in qualification and apprenticeship standards assessment design, development, delivery and determination of results and grades.

The policy also outlines what we expect from Centres and Learners and explains how PAL will respond to the misuse of AI in accordance with PAL policies and regulatory requirements and conditions.

The policy aims to:

- Encourage the **ethical, responsible, and transparent** use of AI across qualification development, delivery, assessment, and awarding.
- Uphold quality, validity, reliability, fairness, and regulatory compliance.
- Acknowledge that AI capabilities and risks are evolving — commit to regular review and updates of AI-related policies.

This policy has been developed in line with:

- [Ofqual’s approach to regulating the use of artificial intelligence in the qualifications sector](#) which provides guidance for AOs on the use of AI
- The JCQ guidance; [AI Use in Assessments: Your role in protecting the integrity of qualifications](#) which provides guidance for Centres on the use of AI.

5. Summary of Use of AI by Learners and Centres

Learners/Apprentices or Centre/Third Party staff may use AI tools to assist with teaching and learning, to explore new ideas, or to structure **formative** work. While AI tools can be beneficial when used for drafting, ideation, or research, they must never be used to generate summative assessment evidence¹, unless the qualification specification explicitly permits it.

Centres/Third Parties may use AI tools to support operational tasks.

Where Centres are permitted to mark assessments or conduct internal quality assurance, **AI tools may be used to identify plagiarism and to support review or comparison but must not replace human judgement**. Centres are responsible for detecting and managing misuse of AI in Learner work and for reporting concerns to PAL, where PAL is their AO. Like wise those Third parties that use PAL’s EP services should report to PAL any concerns they may have regarding the use of AI in any Apprentice’s submitted work or evidence to PAL.

PAL does use plagiarism software, which is also designed to detect AI usage, we also look at use of language, sentence construction, sequencing of words, use of Americanism’s and check references for submitted written work. Where we (PAL) have concerns or detect the misuse of AI we will report back to concerned Parties and we will refer to our Adverse Effect Policy, Investigation procedure and Sanctions policy to consider how we proceed. Suspected, alleged or proven malpractice will be notified to the regulator.

6. Summary of Use of AI by AO Staff, Contractors and Systems

As an Awarding/Assessment Organisation, PAL may use AI tools to support the design, delivery, and quality assurance of its qualifications and assessments. Potential areas of application include:

- Qualification and assessment design
- Marking, moderation, and quality assurance, as an aid but AI cannot be used as a sole marker, any decision must be made by a human and assessment reports should be created by the Assessor without the use of AI generative tools
- Operational processes (e.g. formatting, summarisation, scheduling)
- Analytics and data insights
- Remote proctoring² and monitoring

Examples of appropriate use of AI include drafting assessment tasks, identifying patterns in Learner/Apprentice data, formatting documents, and flagging anomalies in marking. AI tools may assist in these areas but must not automate any process that directly impacts Learner/Apprentice outcomes, certification decisions, or regulatory compliance. All AI use is subject to data protection safeguards, internal audit, and final review and sign-off by a qualified professional.

¹ AI references must always be cited and quoted, but for example the use of AI and prompts should not be exclusively used to produce a piece of evidence. Reports, essays, written assignments and projects and presentations are particularly susceptible to AI misuse and PAL and Centres will need to ensure they have appropriate safeguards in place to guarantee the authenticity of evidence as produced by Learners/Apprentices.

² Note PAL currently does not use proctoring

6.1 Examples of AI Tools

Some of the AI chatbots currently available include:

- ChatGPT
- Jenni AI
- Jasper AI
- Writesonic
- Bloomai
- Microsoft Co-Pilot³

There are also AI tools which can be used to generate images, such as:

- Midjourney
- Stable Diffusion
- Dalle-E 2 (OpenAI)

Software often contains embedded AI, such as Microsoft's Co-Pilot which poses additional risk as Learners/Apprentices may not be aware of its misuse and dependent on the version used, there are additional security risks regarding who can access or see conversations, searches and prompts.

7. Guiding Definitions and Concepts

To support consistent understanding across all users, this section defines key terms used throughout the policy. Definitions reflect common usage in the education and assessment sector, aligned with regulatory expectations.

Artificial Intelligence (AI)

The use of computer systems to perform tasks typically requiring human intelligence, such as recognising patterns, generating content, making predictions, or analysing data. AI includes both general-purpose tools and sector-specific applications.

Generative AI

A subset of AI that can produce content such as text, images, code, or audio in response to user prompts. Examples include ChatGPT, Copilot, Gemini, Claude, and DALL-E. Generative AI may support assessment or learning design but also carries risks to authenticity and validity if misused.

Automated Marking / Scoring

The use of AI tools to assign marks or grades to Learner/Apprentice responses without human intervention. This may include rule-based systems (e.g. MCQ marking) or machine-learning tools for open responses. Where AI is used for open resources, it is expected that a human expert makes any final assessment or grading decisions.

Learning Analytics / Adaptive Learning

AI tools that monitor Learner/Apprentice progress and tailor content or support based on performance data. These may be used to personalise formative learning experiences but must not interfere with summative assessment conditions unless specifically permitted.

Human-Supported vs Automated Decision-Making

A key distinction in this policy is between tools that assist professionals (e.g. summarising trends, drafting content for review) and those that automate decisions (e.g. assigning grades, generating final evidence). Typically, only the former AI tools should be used for summative assessments, recognising that MCQ tests use automated marking based on specific criteria, generated by the test/exam maker.

³ Copilot offers a free, capable version (formerly Bing Chat) with web access, while also offering a Pro version for deeper Microsoft integration. Users of the free version should check security settings and adjust the privacy settings to disable data training, turn off personalization, and regularly clear your conversation

Risks and Evolving Landscape

Whether used by Learners/Apprentices, Centres, or the Assessment Organisation (AO), AI tools carry the following risks:

- Inaccuracy: AI-generated content may include false, biased, or misleading information
- Fabrication: AI can produce fictitious references or citations that do not exist
- Bias: AI tools can reflect or amplify societal or data-driven bias
- Poor use of prompts or agents that create incomplete reports, or build in user bias
- Lack of transparency: Many AI models do not explain how responses are generated⁴
- Inauthenticity: Work produced may not reflect the true ability or understanding of a Learner/Apprentice or any individual using AI
- Security and privacy risks: AI tools may not be compliant with data protection standards
- Regulatory non-compliance: Use of AI in certain assessments may contravene Ofqual's General Conditions (e.g. J1.8 Authentication, A6 Risk, A8 Malpractice)

As AI technology continues to evolve, so too will its role and risks within assessment. PAL is committed to:

- Ongoing review of internal and Centre/ Third Party-based AI use in assessment design and delivery and programme delivery where used
- Providing clear guidance to all PAL personnel and stakeholders
- Maintaining the authenticity, validity, reliability and fairness of all assessments

8. Tool Transparency and Accountability

PAL recognises that many widely used AI tools (e.g. ChatGPT, Gemini, Copilot) are developed by commercial organisations using opaque training data and proprietary algorithms. This limits the ability of educators and regulators to fully assess how content is generated, and may introduce hidden risks such as untraceable bias, inaccuracy, or ethical breaches.

Where PAL or Third Parties/Centres choose to use third-party AI tools, outputs must be treated with appropriate caution. PAL encourages use of tools with transparent training data, published ethical frameworks, and clear safeguards to protect learners and qualification/ assessment standards.

PAL acknowledges that AI is already a common tool used by many in a professional and/or social context, therefore, to deny its use or prohibit its use is not an effective way of managing the risks AI may pose, so we do expect our stakeholders to have a coherent plan for how and when AI can be used and the safeguards, they have in place to prevent misuse.

SECTION A: Learner/Apprentice Use of AI

A.1 Use of AI by Learners/Apprentices

When AI tools are used appropriately, they can support Learners/Apprentices to engage with assessment tasks more confidently, helping them to plan, prepare, reflect and refine their work. In summative assessments AI may be used as part of a wider process to develop ideas and structure thinking. **However, the final evidence submitted for assessment must always represent the Learner's/Apprentice's own, authentic work.**

Learners/Apprentices may use AI freely to support their learning, for example asking AI to explain a topic in simpler terms, provide examples or generate practice questions for revision. In terms of formative assessments Centres should have their own guidelines but Learners/Apprentices may be permitted to use AI to generate ideas and organise thoughts, structure projects, proofread drafts or review teacher/trainer/assessor formative feedback. They should not be allowed to submit AI generated responses for summative assessment.

⁴ It is essential you ask AI to provide information on references it uses and check those references and ask how it has processed information and arrived at decisions

Acceptable uses of AI in summative assessment will vary depending on the subject content and the assessment methods. Learners/Apprentices should refer to their Centre's/Provider/College guidance and PAL's guidance regarding the use of AI. Where a Learner/Apprentice is not sure about the use of AI, they should seek guidance from their Centre/provider/College or they can contact PAL, as the AO directly.

The following are permitted on any assessment where access to a computer is permitted, unless there is specific guidance that says otherwise:

- Using AI as a research tool – with appropriate citing and referencing
- Using spelling and grammar tools to identify mistakes

Other acceptable uses will depend on the nature of the assessment and the use of AI in the workplace. Example of these include (with appropriate citing and references):

- Generating computer code
- Comparing documents
- Generating outputs for human critique and application
- Generating pictures, audio clips, music, presentations, diagrams, graphs

AI must not be used in a way that replaces the Learner's/Apprentice's own knowledge, skills, or decision-making. All final assessment evidence must reflect the Learner's/Apprentice's independent understanding, experience and judgement, not the output of an AI tool.

Learner/Apprentice work must be generated in accordance with Ofqual's General Conditions of Recognition, particularly condition J1.8:

"Authentication"

A process under which evidence generated by a Learner in an assessment is confirmed as having been generated by that Learner (or identified and confirmed as being that Learner's contribution to group work) and as being generated under the required conditions."

Learner's/Apprentice's use of AI must therefore be transparent and must not replace the Learner's/Apprentice's own contribution. Final submitted work must be the Learner's/ Apprentice's own and demonstrate independent understanding. Care must be taken when using built in AI features, for example in Microsoft Word, or Grammarly as these tools may automatically generate, rephrase, or summarise content without clearly distinguishing it from the Learner's/Apprentice's original work.

Any work submitted for assessment must be:

- Authored by the Learner/Apprentice
- Reflective of the Learner's/Apprentice own voice, understanding, and performance
- Appropriately referenced, including any use of AI tools or other research sources

A.2 AI Misuse and Malpractice

Any use of AI that results in:

- A false representation of the Learner's/ Apprentice's experience, knowledge or skills
- A breach of assessment conditions
- Unfair advantage or unauthorised support

...can be considered **malpractice**

This includes, but is not limited to:

- **Plagiarism - submission of work that includes content generated by an AI tool without proper acknowledgement**, in a way that **falsely presents that content as the Learner's/Apprentice's own original work**. For example:

- Copying or paraphrasing AI-generated content, as a result of using prompts or agents or uploading work with the specific purpose of AI augmenting the work in content and style so the work is no longer representative of the Learner's/Apprentice's voice
- Failing to acknowledge the use of AI tools when used as a source of information, or poor validation of resources and references
- Incomplete or poor acknowledgement of AI tools
- Submitting work with intentionally misleading references or bibliographies
- Cheating – for example using AI during a closed-book or invigilated exam⁵
- Fabrication – Using AI to generate false evidence, for example false work based evidence for a portfolio.
- Collusion – for example using AI to rewrite, or summaries another person's work

The Learner/Apprentice should be responsible for the content of their work and in submitting any work for assessment they are confirming its authenticity, and their work will be accepted as authentic at the point of submission.

If plagiarism or other misuse is detected⁶, by either Centre/ Third Party personnel or PAL staff, firstly it must be reported to PAL and PAL's Responsible Officer and the Learner/Apprentice will be subject to investigation and sanctions can be applied, which depending on the circumstances may include:

- a downgrading of results
- a fail being issued
- a refusal to certificate the Learner/Apprentice

If plagiarism results in downgrading results, typically a resit or resubmission is not permitted. It is at the discretion of the AO whether resits or resubmissions are allowed in any other circumstances where malpractice is identified.

Any costs associated with a permitted resubmission will be the responsibility of the Centre/ Third Party, and PAL will reserve the right to amend any Qualification/Apprenticeship Standard and/or Centre/Third Party risk rating where there is a case of proven malpractice.

Centres must advise the AO of any cases of plagiarism on discovery in whatever format it presents.

Cases of identified or proven malpractice will be considered notifiable events for the appropriate regulator. Learners/Apprentices should also be aware that some employers may wish to take their own disciplinary action where there is proven malpractice, this may be particularly relevant to those qualifications that in effect provide a License to Practice.

A.3 Acknowledging the Use of AI

Learners/Apprentices must acknowledge any use of AI tools in their assessment submissions. This includes naming the tool used, describing how it was used, and referencing any content it provided in line with academic standards. Centres must ensure Learners/Apprentices understand how to do this and retain evidence to support authenticity.

Unacknowledged and unreported use of AI may be considered malpractice by the Learner/Apprentice and will be judged as a minimum as maladministration by the learner/Apprentice and Centre/third Party.

A.4 Translators

Learners/Apprentices are responsible for ensuring that all work submitted is their own, and that it reflects their authentic understanding and use of language.

⁵ The use of secure test platforms should minimise the misuse of AI, but may not completely eradicate such events occurring

⁶ PAL is aware of the potential of false positives in plagiarism software and investigations therefore may include review of other work undertaken by the Learner/Apprentice, comparative evaluation of other assessments (if any) they have undertaken or submitted for the particular qualification/standard and where appropriate discussions with the Centre or employer who may be able to provide useful insights about the evidence in question and their knowledge of the individual.

PAL recognises that some Learners/Apprentices may use translation tools (e.g. Google Translate, DeepL) to support their comprehension of tasks or resources, this is acceptable during learning and formative assessment activities, but any work submitted for summative or synoptic assessment must demonstrate the learner's/Apprentice's understanding and be representative of their voice and presented in the native language pertaining to the assessment.

PAL qualifications and apprenticeship standards are assessed in English unless a specific reasonable adjustment has been approved (e.g. British Sign Language or Braille). Automated translation tools must not be used to bypass language requirements.

Learners/Apprentices must not:

- Submit AI-translated content without review or revision
- Use translation tools to generate full answers or written content
- Allow translation tools to “stand in” for their own language skills or subject understanding

Important: Some AI detection systems may incorrectly flag translated content as artificially generated. Learners should revise translated material in their own words and retain notes or drafts where possible to support authenticity if questioned.

SECTION B: Use of AI in Teaching, Learning, and Formative Assessment

AI tools are increasingly used in education settings to support teaching, learning, assessment preparation, and feedback. When used responsibly, AI can help Centres, Third Party Providers/Colleges improve efficiency, support Learner/Apprentice understanding, and enhance the delivery of programmes. However, any use of AI that compromises the integrity of assessment, either by enabling malpractice or by undermining the role of assessors, or the assessment process, is not permitted.

Centres and Third Party Providers and Colleges have a critical role to play in ensuring that both Learners/Apprentices and staff understand when AI use is acceptable and when it is not.

B.1 Teaching and Learning

AI tools are increasingly used in education settings to support teaching, planning, and resource development. When used thoughtfully, AI can improve efficiency, support learner engagement, and enhance curriculum delivery. However, Organisations should be aware of the risks and ensure that AI use does not diminish the role of the teacher or compromise educational quality and academic integrity.

Examples of permitted uses:

- Using AI to generate scaffolded resources or discussion prompts
- Drafting lesson ideas or enrichment activities
- Supporting accessibility by adapting content formats (e.g. rephrased text)
- Creating revision materials or flashcards
- Using AI to create suggested reading lists or enrichment prompts
- Using AI to enhance presentations by use of AI created imagery or media clips

Points for Caution:

- AI-generated content such as worked examples, model answers or explanations should always be checked by a qualified subject specialist before use
- Content produced by AI should be reviewed for accuracy, appropriateness, and alignment with the qualification or curriculum by a subject specialist
- AI should not be relied on to replace teacher/trainer insight or pedagogy

Organisations are encouraged to develop internal guidance to support teaching/training staff in identifying appropriate and inappropriate use of AI, and to share good practice across teams.

B.2 Formative Assessment

Formative assessment helps learners understand their progress and guides teaching strategies. AI tools can support formative activities by generating questions, providing feedback suggestions, or highlighting patterns across groups of Learners/Apprentices, but only when used with human oversight.

Examples of permitted uses:

- Use AI to generate draft questions or low-stakes quizzes that are reviewed by teaching/training staff before use
- Use AI tools to help generate draft formative feedback that is adapted and personalised by Teachers/Trainers/Assessors
- Use adaptive learning platforms to provide tailored revision content or highlight knowledge gaps
- Use AI to analyse group-level progress and inform future teaching

Points for Caution:

- Feedback provided to Learners/Apprentices should be reviewed against relevant learning/assessment outcomes and criteria, evidence based and where 1;1 feedback is provided, this should be tailored to the individual's concerned needs
- Centres/ Third Party Providers/Colleges should avoid relying on AI for assessment judgements, even in formative contexts
- Learners/Apprentices should not submit AI-generated work as evidence of their own understanding, even for formative activities, this means they must be guided on acceptable AI use from programme outset
- Centre, Third Party Providers/Colleges quality assurance sampling should include scrutiny of AI use by Learners/Apprentices/ Teachers/Trainers/Assessors

Organisations are encouraged to develop internal guidance on the use of AI in teaching/training, learning formative assessment and summative assessments.

SECTION C: AI Use in Summative Assessment and QA

Summative assessment determines final grades or outcomes. The expectations for authenticity and independent evidence are highest here. Any AI use must be strictly controlled, this applies equally to Centre assessments and any assessments undertaken by the AO.

AI tools may be used to support, but not replace, human judgement and all final decisions must be made by a qualified human assessor and appropriately quality assured and/or moderated dependent on the qualification or apprenticeship standard specification and AO's CASS.

AI use must be transparent, documented, and subject to quality assurance. Systems or tools used must be secure, appropriate for qualification/apprenticeship level, and regularly reviewed.

Assessors and IQA should not rely on AI for marking, grading or the authoring of assessment reports, in addition to potential assessment breaches and maladministration, any inclusion of personal information may also contravene data privacy and protection legislation. Where AI generated Assessment or IQA reports are detected, this should be reported at Centre level and the AO notified, both parties should establish to their satisfaction the impact of this maladministration and the action to be taken.

9. Detecting AI Misuse in Learner/Apprentice Work

9.1 Signs of Misuse

Assessors must remain vigilant for signs of inappropriate AI use in summative assessments. All written work, such as reports, portfolios, presentations, or case study responses, should be reviewed to establish the responses are representative of the Learner's/Apprentice's experience, knowledge and understanding and skills.

Checks may include:

- Searching phrases or extracts using Google or other search engines
- Running the work through a recognised plagiarism or originality checker (e.g. Turnitin, Grammarly, Unicheck)
- Comparing the style, structure, and language to other pieces of work by the same Learner/Apprentice
- Reviewing consistency with the Learner's/Apprentice's broader performance profile
- Comparing work submitted by Learners/Apprentices on the same programme or working with the same trainer/assessor — this may indicate that AI-generated content (e.g. a model answer, scaffold, for example) was shared by the trainer/assessor or circulated informally between Learners/Apprentices.

9.2 Detection Tools and Methods

There are also computer detection tools to identify potential AI misuse:

- OpenAI Classifier: <https://openai.com/blog/new-ai-classifier-forindicating-aiwritten-text/>
- GPTZero: <https://gptzero.me/>
- GLTR: <http://gltr.io/dist/>
- Turnitin Originality: <https://www.turnitin.com/products/originality>

Note detection tools accuracy is not a 100%- estimates suggest the best tools are 84% accurate and free tools can have error rates of 35% +

9.3 What are the Common f9.4 laws of AI Detectors

False Positives:

Human-written text can sometimes exhibit patterns that resemble AI output (like low "perplexity" or "burstiness"), leading to it being flagged as AI-generated.

False Negatives:

Newer AI models are increasingly sophisticated at mimicking human writing, including personal reflection and nuanced arguments, making it harder for detectors to identify them.

Evolving Technology:

The rapid development of AI language models means detection tools constantly struggle to keep up with new generations of AI-generated content.

Text Modification:

Methods used to make AI text more undetectable, such as intentionally adding typos or poor grammar, can make the text appear suspicious or inappropriate for its intended purpose.

9.4 Oral assessment and alternative evidence

Where authenticity is in doubt, Assessors/ Quality Assurance may conduct additional checks such as oral questioning or supplementary assessment tasks. Any action must align with the qualification/apprenticeship specification and PAL's Malpractice and Plagiarism Policy⁷. The learner/Apprentice cannot present alternative assessment or provide further evidence in any formal summative assessment activity.

⁷ Or Centre's Malpractice and Plagiarism Policies that should be aligned to PAL's

Reporting procedures

Any legitimate concerns about the authenticity of a Learner's/Apprentice's work, or about the misuse of AI by Learners/Apprentices, Assessors or other Centre/Third Party staff, must be reported to PAL reporting requirements are the same for PAAL personnel and Third Party personnel.

Internal quality assurance⁸ process should ensure:

- That any AI-related anomalies are flagged early
- That cases are investigated in line with PAL's investigation procedures
- That outcomes are recorded and reported to PAL promptly
- That support and training are implemented to prevent recurrence

If any plagiarism investigation is inconclusive, either PAL or the Centre under the direction of PAL should review the quality assurance process and review other similar assessments to detect any similarities or anomalies across assessments. PAL may also in these cases make recommendations for further enhancement of the Centre's quality assurance sampling activities, or where PAL has the role of IQA, review PAL's sampling strategy, which may also extend to EQA sampling and CASS. PAL's Responsible Officer will advise the Regulator of such events and intended actions, which will have been approved by the Quality and Standards Committee and PAL's Board.

If the Centre does not have access to plagiarism checking software (and PAL recommends you consider such software) The AI Centre guidance produced by provides a checklist for Tutors/Trainers/Assessors and IQAs to use, to consider whether a Learner/Apprentice has used AI in fashion that constitutes non-compliant practice.

If concerns of AI misuse are raised by PAL staff either as part of their EQA processes or on an externally marked or moderated assessment PAL will follow its investigation procedure and Maladministration and Malpractice policy.

Note for PAL personnel, if PAL has concerns about how PAL personnel are using AI or if it is identified they are using non-approved AI tools, or using AI tools for tasks that PAL is clear should be human created and authored they will be subject to PAL's Maladministration and Malpractice and Disciplinary procedures and for associates and consultants, where they have breached the terms of their service level agreement, their agreements can be terminated with immediate effect.

SECTION D: Marking, Moderation and External Quality Assurance

AI tools can offer efficiencies and insights when used to support assessment processes, but they must never undermine the principles of validity, reliability, and fairness. **All final assessment outcomes must be determined by trained, qualified professionals — not by AI alone and this means assessment reports and gradings must be authored by humans and not be completed by using AI prompts or total reliance on AI generated rubric-based assessments.**

This section outlines how AI may be used to support marking, moderation and external quality assurance (EQA), both by Centres and by PAL as the Awarding/Assessment Organisation (AO).

D.1 Acceptable Use of AI in Marking and Assessment Support

AI tools may be used to support, but not replace, human judgement. Examples of valid support uses include:

By Centres and AO Assessors:

- Checking spelling and grammar to assist with the clarity of written feedback- AI must not be used to author assessment records, such occurrences breach assessment security and raise potential data privacy breach issues and will be treated as malpractice

⁸ This applies to approved Centres and PAL's Quality team where they undertake a IQA function

- Use of approved AI generated rubrics, subject to additional human checking

By IQAs and EQAs:

- Analysing trends in assessor judgements across Centres- EQAs
- Identifying potential risk indicators in marking consistency- IQAs/EQAs
- Supporting cohort comparison and sampling strategy development-IQAs/EQAs
- Highlighting anomalies between Centre and AO-issued grades or pass rates-IQAs/EQAs

In all cases:

- **Final decisions must be made by a qualified human assessor, IQA, moderator, or EQA**
- **AI use must be transparent, documented, and subject to quality assurance- Learners/Apprentices should know that AI can be used in assessment, providing it is used as detailed in this policy and their work and data are secure**
- **Systems or tools used must be secure, approved by PAL⁹ or the Centre as appropriate, appropriate for qualification/apprenticeship level, and regularly reviewed**

AI Must Not Be Used To:

- Assign marks or grades without assessor oversight or approval
- Override professional human judgement in determining Learner/Apprentice competence- for the purpose of reviewing borderline cases and results a second professional should be used to evaluate assessment judgements
- Replace direct engagement with Learner/Apprentice evidence (e.g. summarising portfolios before review and only referring to the summary)
- Filter, prioritise, or discard Learner/Apprentice evidence prior to human judgement
- Make decisions about Learner/Apprentice certification or progression
- Automate moderation adjustments without human input
- Automatically determine Centre risk ratings or EQA outcomes

Any such use risks invalidating assessment outcomes and breaching Ofqual's General Conditions of Recognition.

Centre/ Third Party Provider/College Responsibilities

Where Organisations choose to use AI tools to support internal marking or standardisation, they must ensure:

- The tool is used to support, not replace, assessor judgement
- All assessors understand when and how AI can be used appropriately
- All AI-assisted marking processes are documented and auditable and subject to IQA sampling
- Any impact on marking decisions can be justified through human rationale
- Learners/Apprentices are informed where AI is used in the process (e.g. for feedback or error-checking)

AO Responsibilities – External Assessments, Quality Assurance and Moderation

PAL may use AI tools to support moderation and quality assurance of Centre-delivered and AO-marked assessments.

This includes:

- Supporting sampling strategies based on identified risk patterns
- Highlighting marking inconsistencies for human moderation
- Reviewing language complexity or tone across feedback and outcomes
- Tracking changes in cohort/centre/qualification/apprenticeship standard performance over time

PAL will not use AI to:

- Mark external assessments without human moderation or sign-off
- Determine pass/fail outcomes without human intervention

⁹ Use of free versions of generative tools such as ChatGPT and Co-pilot are not encouraged. PAL personnel (to include associates/consultants) must check what AI tools are permitted when working for PAL. Centres AI policies or guidance should make clear the use of AI and approved AI tools

- Override human professional judgement during moderation or EQA

All AI-supported processes are overseen by experienced assessment professionals and reviewed regularly to ensure they align with regulatory requirements.

D.2 Documentation and transparency

Where AI tools are used to support marking or standardisation, users must ensure:

- The tool is used to support, not replace, assessor judgement
- All AI-assisted marking processes are documented and auditable
- Any impact on marking decisions can be justified through human rationale
- Learners are informed where AI is used in the process (e.g. for feedback or error-checking)

SECTION E: Qualification and Assessment Development

AI tools can offer valuable support in the design of qualifications and assessments, improving efficiency, creativity, and accessibility. However, all content must continue to meet regulatory, occupational, and quality standards. Human oversight remains essential to ensure that AI-generated outputs are accurate, valid, and appropriate for the qualification/apprenticeship level and context.

AI may be used to support the design of qualifications, assessments, and supporting materials in the following ways:

- Brainstorming draft performance outcomes, topic areas, or content structure
- Creating first drafts of multiple-choice or knowledge-based questions for review, or used for supporting the creation of distractors
- Suggesting varied task types or formats to support accessibility or on-demand delivery
- Identifying potential duplication across units, knowledge, skills or qualifications/apprenticeship standards
- Rewording content for clarity, tone, or level appropriateness
- Generating examples or case studies to inform human-authored content
- Suggesting ideas for formative or practice assessment activities such as quizzes
- Summarising external standards, frameworks, or regulatory documents to support internal understanding
- Refining marking tools
- Comparing content – for example comparability between apprenticeship assessment plan versions
- These uses must always be treated as a starting point. All outputs must be reviewed, validated, and approved by a qualified individual prior to use in a live context

AI Must Not Be Used To:

- Write final versions of assessment instruments without human review
- Draft high-stakes or competency-based tasks without appropriate subject expert involvement
- Replace subject matter experts in interpreting occupational or professional requirements
- Generate assessment content that has not been reviewed against cognitive demand, assessment objectives, or validity principles
- Automatically map content to regulatory frameworks or qualifications without verification
- Determine grading criteria or thresholds without evidence and expert judgement
- Create final versions of model answers or mark schemes without human authoring and sign-off

The inappropriate use of AI in assessment design may lead to invalid, unreliable or unfair assessments and will be treated as a breach of quality standards.

E.1 Documentation and oversight

All content generated with the support of AI must be:

- Reviewed and signed off by an appropriately qualified subject matter expert
- Checked for factual accuracy, language level, clarity, and relevance to the qualification/apprenticeship standard
- Evaluated against the principles of validity, reliability, comparability and fairness

- Documented with clear indication of any AI input in the drafting process

Where AI is used to support content development, teams must be able to demonstrate that the final outputs were human-led and compliant with relevant regulatory and occupational requirements.

E.2 Designing to Reduce AI Risks

Where assessments are being designed or reviewed, developers must also consider how task types and assessment conditions can reduce the risk of inappropriate AI use by Learners/Apprentices. This may include:

- Incorporating personalised, observed time-bound assessments
- Use of AO run test Centres
- Stress testing platforms/firewalls to check robustness and vulnerability to hacking and malware
- Ensuring Learners/Apprentices, through guidance and support materials know what the AO considers legitimate assistive technology and in terms of summative assessment what AI is permitted and will work with platforms, and which tools may be barred or incompatible with the AO software
- Including as assessment activities professional discussion or viva to verify understanding
- Using contextualised, workplace-specific or scenario-based tasks
- Avoiding generic tasks that could easily be completed using AI without real understanding

PAL staff and consultants and contractors involved in qualification or apprenticeship assessment design must:

- Follow approved development processes, including sign-off by qualified specialists
- Advise PAL, prior to starting any commission if they are using AI to support the work, this will allow PAL to determine whether AI has a place and the safety and security of the intended software
- Document the use of AI tools, where applicable, as part of the development audit trail
- Ensure any AI-assisted content is reviewed through internal quality assurance procedures
- Avoid introducing AI content into specifications or assessments that has not been independently validated
- Remain up to date with current guidance on the ethical and effective use of AI

Where inappropriate use of AI has been flagged or requests for AI have not been made and approved PAL reserves the right to review any service level agreements or contracts and if required ask for new work to be submitted at no cost to PAL.

SECTION F: Operational and Strategic Use of AI

F.1 Use of AI in Operations

AI tools may be used by PAL staff to streamline routine operational tasks, including:

- Proofreading and formatting documents such as specifications, reports, or assessment instruments
- Summarising regulatory guidance to support staff understanding and internal implementation
- Drafting emails, templates, or reports for human review

These uses are permitted where they support efficiency or clarity but must not introduce automated decision-making that affects assessment outcomes, regulatory compliance, or stakeholder communications without sign-off from a qualified person.

F.1 Use of AI in Analytics

PAL may use AI-enabled systems to analyse Learner/Apprentice, Centre, or qualification/apprenticeship standard performance data. This includes:

- Identifying patterns or trends in results or marking
- Highlighting anomalies or areas of risk for further investigation
- Supporting continuous improvement of qualification/ apprenticeship assessment design and delivery

Any insights generated by AI must be reviewed and interpreted by a qualified staff member. AI outputs may inform, but must not replace professional judgement in regulatory reporting, Centre monitoring, or qualification review.

The use of internal data must be carried out in accordance with PAL's Data Protection and Privacy policy.

Please refer to SECTION D: AI Use in Summative Assessment and QA (Marking, Moderation and External Quality Assurance) and SECTION G: Approved Tools and Data Security

F.2 Use of AI in Remote Proctoring / Invigilation

Where remote proctoring is used as part of PAL's assessment model, AI tools may support:

- Monitoring of screen activity, keystrokes, or behaviour for potential breaches
- Flagging of unusual patterns for human review

In line with Ofqual guidance AI proctoring is used as a supporting tool only. PAL remains responsible for ensuring that all proctoring practices, where used are fair, proportionate, and fully compliant with regulatory requirements and data protection law.

SECTION G: Approved Tools and Data Security

PAL recognises that the use of AI brings additional responsibilities in protecting personal and sensitive data, particularly where systems are used to analyse Learner/Apprentice data, support operational processes, or enable remote proctoring.

PAL recommends that Centres and Third Party Providers/Colleges have protocols regarding what AI tools can be used by personnel and how data security will be assured.

AI systems can introduce new risks that must be carefully managed. These include:

- Unintended or excessive data sharing, especially when using free, publicly accessible platforms
- Security vulnerabilities within generative AI tools or remote proctoring systems
- Lack of control over data once entered into externally hosted or opaque systems
- Inconsistent or unreliable outputs when data used is inaccurate, incomplete, or poorly structured
- Analysis additionally affected by the quality of prompts or use of agents, with self-curated or available as part of the AI package

To mitigate these risks, PAL applies the following safeguards to all AI use.

G.1 Limiting Data Sharing

PAL personnel must not enter any confidential, identifiable, or assessment-related information into free AI platforms (e.g. ChatGPT or CoPilot). This includes:

- Draft assessment materials (even in early form)
- Learner or Centre datasets
- Regulatory submissions or sensitive correspondence
- Only appropriate, non-sensitive content may be processed using public AI tools, PAL personnel must check with PAL regarding use and Centres should have a reflective process

G.2 Differentiating Tools by Task

PAL permits different tools depending on the confidentiality and risk level of the task, so for example

Staff may use free or general-use AI tools where no personal data, regulated content, or confidential material is involved:

- ChatGPT – free version
- Microsoft CoPilot – free version
- Jenni AI
- Writesonic
- Jasper AI
- BloomAI

These tools may be used for drafting, summarising content, or research that is already in the public domain and can **only be used when data sensitivity and task risk are low.**

AI image generation tools are permitted only for general design, creative, or illustrative work:

- Midjourney
- Stable Diffusion
- DALL·E 2 (OpenAI)

Image generation tools must not be used to create content that misrepresents individuals or qualifications, assessments or that could compromise brand reputation or regulatory compliance.

Centres/ Third Parties should have their own process for AI usage approvals.

For PAL AI usage approval: Support services and Assessors (this includes associates) should gain approval from the Assessment/Account Managers or Business Operations Director or the Support Services Lead.

The quality team (this includes associates should seek approval from the Business Operations Director or Qualifications Director. The Development team and this includes any consultants should seek approval permission from the Qualifications Director.

For confidential or regulated tasks, only authorised and secure tools may be used:

- ChatGPT – paid version
- CoPilot – paid version

Use of other AI tools for confidential tasks must be explicitly approved, and only where appropriate safeguards (e.g. data processing agreements) are in place, by a PAL Director as intonated above, in the absence of the Business Operations Director or Qualifications Director, the MD or Director of Audit and Compliance approval can be sought.

The compilation of assessment records would be regarded as a confidential task and currently PAL prohibits the use of AI for authoring assessment records.

PAL personnel must follow any specific platform access or data tagging protocols issued for these tools, PAL will issue guidance for any AI generated data analysis, which will include who has authority to use the tools and data, sharing of data, storage of data and signing off and checking of data analysis accuracy.

G.3 Usage Protocols and Controls

To ensure AI-supported outputs are reliable and traceable:

- All data entered into AI tools must be complete, accurate, and appropriately tagged

Where AI tools are connected to organisational datasets or systems, explicit safeguards must be in place, including:

- Defined data access permissions
- Encryption or tokenisation where applicable
- Logging and audit of data use or access points

These controls are essential for maintaining data integrity and security.

G.4 Audit

Regular internal audits will check:

- That only approved tools are in use
- The data protection measures are being consistently applied

Any concerns or anomalies will be investigated in line with PAL's approach to investigations and in conjunction with this policy, PAL's Maladministration and Malpractice policy, alongside PAL's data privacy and protection policy confidentiality policy and anti-bribery and corruption policy.

G.5 Review of Approved Tools

PAL will regularly review its approved AI tools to reflect:

- Evolving platform capabilities
- Changes in security features or licensing models
- Regulatory updates or industry best practice

No unapproved tools may be used for PAL-related work without formal review and approval. Where possible, PAL and its Centres/Third Parties should favour AI tools with clear information about their training data, data handling, and ethical safeguards.

Section H: Training and Support

To ensure responsible, informed, and confident use of AI:

PAL will provide training and guidance to its employed and engaged personnel on appropriate and ethical AI use, including:

- Tool selection and permissions
- Data handling and tagging
- Identifying misuse or overreliance

PAL will also share with PAL Centres and Third Parties basic guidance including:

- What AI use is permitted or prohibited in delivery and marking
- How to identify, investigate, and report misuse
- Expectations for Learner/Apprentice support and referencing

Centres and Third Parties are expected to provide Learners/Apprentices with accessible guidance and resources, helping them:

- Understand what constitutes appropriate AI use
- Acknowledge tools used and reference them correctly
- Avoid malpractice and maintain academic integrity

Guidance will be updated regularly to reflect regulatory changes, new technologies, and emerging risks; however, we recommend Centres are responsible for the professional development and training of their personnel in the use of AI.

Section I: Governance and Oversight

The use of AI in qualification design, assessment, marking, moderation, and operational processes must never compromise the principles of validity, reliability, authenticity, fairness, or regulatory compliance.

PAL's governance arrangements seek to ensure that all AI use, whether by PAL staff, Centres, Third Parties or Learners/Apprentices, is ethical, transparent, and properly controlled.

I.1 Oversight and Accountability

- All AI use must be documented, traceable, and auditable. This applies to both PAL internal processes and Centre/ Third Party-led activity
- Centres must maintain internal records of how AI tools are used in assessment delivery, marking, and Learner/Apprentice support
- PAL will monitor AI use across its qualifications/ Apprenticeship Standards through existing quality assurance, moderation, and audit procedures
- Suspected misuse or unauthorised AI activity will be investigated under PAL's Malpractice and Maladministration Policy

I.2 Risk Management

A risk-based approach will be applied to the review of AI use by Centres/ Third Parties and by PAL staff, ensuring greater scrutiny where:

- New or untested AI tools are used
- Assessment decisions are affected
- There are known risks to authenticity or regulatory compliance

AI-related risks will be assessed as part of:

- Qualification and assessment development
- Centre monitoring and approval
- Quality and Standards Committee reviews
-

I.3 Regulatory Transparency

PAL will record how and where it uses or permits the use of AI by Centres/ Third Parties and Learners/Apprentices.

This includes being clear about:

- Whether AI has been used in assessment design or development
- Which tools have been permitted for use by Centres
- How AI outputs are reviewed, validated, or moderated

PAL will report material changes in AI use or policy to Ofqual in line with General Conditions of Recognition (e.g. A6, A8, J1.8).

Section J: Ethical and Equity Considerations

The integration of AI across assessment, qualification development, and operational processes offers significant opportunities, but also introduces important ethical considerations.

Key issues to consider include:

J.1 Data privacy and security

AI tools often require large datasets to function effectively. If used without appropriate safeguards, they may expose Learner/Apprentice data to unauthorised access, breaches, or misuse. All AI use must be subject to the same data protection expectations as any other processing activity, including compliance with UK GDPR.

J.2 Digital divide and access inequality

Learners/Apprentices and Centres may have differing access to digital tools, internet connectivity, and AI-capable devices. Without mitigation, this can create unequal opportunities with some learners/apprentices having a distinct advantage or benefit from AI-driven learning, support, or administrative systems. The AI inequity may also impact on accessibility arrangements, so PAL and Centres need to consider access to information and resources in a range of viable formats that allows for wide participation.

J.3 Potential for bias or misinformation from AI outputs

AI models reflect the data they are trained on, which means they can reinforce existing social, cultural, or occupational biases. There is also a risk that AI tools may return inaccurate or fabricated content, especially when prompted for factual or technical information. These risks must be accounted for when AI is used in the creation of assessment materials, guidance, or supporting formative Learner/Apprentice feedback.

J.4 Over-reliance on AI reducing critical thinking

Known as *cognitive offloading*, this occurs when Learners/Apprentices or any individual defer too frequently to AI, particularly in early stages of planning, writing, or decision-making. This can lead to reduced retention, weaker reasoning skills, and a diminished ability to respond to unfamiliar or complex problems. For example, where employees use AI to complete repetitive or automated tasks, long-term capability gaps may emerge. From a

regulatory standpoint, this may impact on the continuity of service and the resilience of internal processes (see General Condition of Recognition A6).

However, it's important to balance this concern with the recognition that AI can also free up human capacity. When used appropriately, offloading routine or low-value tasks can allow more time for creativity, reflection, and high-level analysis. Clear policies and guidance can help promote this balance.

J.5 Environmental impact of excessive AI use

While individual AI usage may seem low-cost, systemic reliance on AI can contribute to broader environmental harms, particularly if tools are used unnecessarily or inefficiently. Ethical AI implementation includes considering sustainability, and reserving use for tasks where it genuinely adds value.

10. Monitoring and Review

This policy is reviewed as a minimum on an annual basis

11. Regulatory References

PAL is required to establish and maintain compliance with regulatory conditions and criteria. This policy relates to Ofqual General Conditions of Recognition: Identification and management of risks A6; Malpractice and Maladministration A8; JI.8 Authentication

PAL will review this policy when Ofqual's new apprenticeship regulatory framework is issued in 2026.

Date Created: 31st July 2025

Last Review:

Next Review: 31st July 2026

Person Responsible for review: Qualifications Director/ Business Operations Director

This Policy has been agreed by the PAL Board