ROYAL ACADEMY OF MUSIC

EQUALITY IMPACT ASSESSMENT

Department	Senior Management Team (SMT)
Policy	AI Policy: The Use of Generative Artificial Intelligence (GAI) and Academic Practice

Description

This Equality Impact Assessment (EIA) evaluates the potential effects of implementing a GAI policy on the protected characteristics as defined by the Equality Act 2010. The aim is to ensure that the policy promotes equality and does not inadvertently disadvantage any group.

The Academy's aim is to develop a policy and set of procedures to frame, regulate and monitor student use of GAI in relation to academic, composition and artistic development related activities and one which mitigates ethical, practical and legal (IPR) risks. A paper prepared for consideration by Academic Board was received on 27 June 2024, and covered the following areas: Definitions, Principles, Regulations, Documentation, Information, Advice, Guidance and Training.

It was agreed that the policy should cover translation tools and generative tools, but not software programmes that have in-built checking or default layout tools e.g. Microsoft Word or Sibelius.

It was agreed that the policy should be based on the following principles:

- Setting out and communicating as clearly as possible Academy expectations about the use of GAI;

- Training all students and staff on the risks and the use of GAI by giving concrete examples of good and bad practice;

- Policing the misuse of GAI through our Academic Malpractice policies and procedures.

This paper considered by Academic Board informed the Academy's draft GAI policy which was circulated for discussion on 5 September 2024.

The policy includes a Regulations section which states *"The use of Artificial Intelligence is not in itself academic misconduct however it may be classified as a form of academic misconduct if you have submitted work as your own without clearly stating which AI tool has been employed and how it has been used in your submission."*

The following documentation will be modified to reflect the principles detailed in the policy:

- Guidance on the submission of student work for assessment
- Academic Malpractice Regulations

It was agreed that a training programme and embed teaching on the use of GAI should be introduced for staff and students in the 2024/25 academic year.

Could the policy have an adverse impact on equality in relation to the following protected characteristics as defined by the Equality Act 2010?

Age
Disability
Gender re-assignment
Marriage or civil partnerships
Pregnancy and maternity
Race
Religion or belief
Sex
Sexual orientation

Like all sources of material GAI can contribute to good academic practice, poor academic practice, and academic malpractice. The policy states that the key factor in the use of GAI materials is how the user can demonstrate ownership of the materials they have used (i.e. how they have understood the materials, made defensible choices in how they have used them, and been transparent about their processes.

The policy should not have any direct adverse impact on the protected characteristics. However, the following should be taken into account:

- Care should be taken to ensure that student information, guidance and training is appropriate for all levels of student understanding, cultural background and the level of English language skills of international students.

- GAI systems may not always recognize or accommodate specific disabilities, leading to potential exclusion or disadvantage students with such conditions. This can be mitigated by discussion and use of reasonable adjustments as part of Personal Learning Plans (PLPs).

- Bias against the protected characteristics could be evident within AI algorithms, which could perpetuate racial stereotypes or discrimination. This could be mitigated by discussion in the guidance and training provided to students.

- The lack of cultural sensitivity in GAI outputs could offend or exclude certain religious groups. This could be mitigated by discussion in the guidance and training provided to students.

- Although socio economic status isn't a specific protected characteristics within the Equality Act, there is good evidence that lower socio-economic groups are disproportionately represented by individuals with protected characteristics. There is a possibility that students with better finances would be able to employ more sophisticated AI software, sitting behind paywalls and subscriptions, and would therefore be at a greater advantage. Although this is difficult to address, or mitigate, within a specific policy it is important that we raise staff awareness of potential of this issue.

Does this policy provide opportunities to make a positive impact on equality?

Yes, the policy does provide an opportunity for a positive impact on equality in the following ways:

- Verification of use of translation tools should have a positive impact and the English Language Support department feel that this transparency will allow international students to feel more comfortable in use of both translation and GAI tools.

- Having a defined policy and process will help to eliminate the disproportionate detection of Academic Malpractice cases related to international students, where the use of AI may be the case of a genuine misunderstanding of legitimate academic practice. Anecdotal themes emerging from Academic Malpractice meetings report that a number of international students simply do not see the use of GAI as a malpractice issue, e.g. "everyone is using it".

- Revised regulations, marking descriptors with emphasis on independent thinking and originality of ideas and specific student guidance will bring clarity for all students, including international students, on how GAI can be used legitimately within assessments.

- Having a defined policy will be particular helpful for students with PLPs for whom use of GAI can be a useful study tool.

What evidence has been considered? What consultation has been undertaken?

- The development of a GAI policy was included as an agenda item for discussion at both Undergraduate and Postgraduate Programme Board meetings throughout the 2023/24 academic year.

- The development of a policy was discussed at the combined Undergraduate and Postgraduate Academic Studies staff meeting; summer term 2023/24.

- A policy development paper was received and approved by Academic Board on 27 June 2024.

- The draft policy was reviewed at an all staff meeting on 5 September 2024.

- Analysis of academic malpractice data was undertaken, with particular reference to cases related to student use of GAI.

- Further review and consideration of policy implementation and development will be built into the BMus 2024/25 Periodic Programme Review.

- The Equality and Rights Alliance paper 'An analysis of the introduction of socio-economic status as a discrimination ground'

- The following documents were also consulted in the drafting of the policy:

HEI Policies
https://oue.fas.harvard.edu/ai-guidance
https://academic.admin.ox.ac.uk/ai-in-teaching-and-assessment
https://provost.mcmaster.ca/office-of-the-provost-2/generative-artificial-intelligence-2/task-force-on-generative-ai-in-teaching-and-learning/provisional-guidelines-on-the-use-of-generative-ai-in-teaching-and-learning/
https://www.plagiarism.admin.cam.ac.uk/what-academic-misconduct/artificial-intelligence
https://libguides.usc.edu/generative-AI/scholarship-research#:~:text=Currently%2C%20USC%20does%20not%20have,the%20use%20of%20generative%20AI.
https://uit.stanford.edu/security/responsibleai
https://communitystandards.stanford.edu/generative-ai-policy-guidance

Other Policies
https://www.ukmusic.org/wp-content/uploads/2023/07/UK-Music-Policy-Position-Paper-on-Artificial-Intelligence.pdf

Research Literature
https://www.mckinsey.com/bem/our-insights/the-impact-of-generative-ai-on-black-communities
https://academic.oup.com/pnasnexus/article/3/6/pgae191/7689236
https://hopelab.org/teen-young-adult-perspectives-generative-ai/
https://slejournal.springeropen.com/articles/10.1186/s40561-023-00276-4
https://www.tandfonline.com/doi/full/10.1080/09540091.2024.2353630
https://www.mdpi.com/2413-4155/6/1/3
https://www.ofcom.org.uk/internet-based-services/technology/gen-z-driving-early-adoption-of-gen-ai/

https://www.agilitypr.com/pr-news/public-relations/ai-super-users-new-research-asserts-that-about-one-sixth-of-the-general-population-uses-generative-ai-every-day-are-you-among-them/
https://www.bcg.com/publications/2023/how-people-create-and-destroy-value-with-gen-ai
https://educationaltechnologyjournal.springeropen.com/articles/10.1186/s41239-023-00411-8?

Actions agreed as a result of this EIA

The policy has the potential to significantly benefit various equality groups by promoting inclusivity and accessibility. However, careful implementation and ongoing monitoring are essential to mitigate any negative impacts.

The following actions will be reviewed, and progress/completion reported to the Belonging Committee.

Action	Who	Timescale	Progress
Ensure staff/student training includes review of the potential bias of AI logarithms against the protected characteristics.	All staff who deliver training	2024/25	
Create an AI good practice SharePoint resource to minimize the potential for bias against the protected characteristics.	Working Group	2024/25	
Monitor and report on effectiveness of staff/student training.	UGPB.PGPB, Academic Board	2024/25	
Monitor Academic Malpractice data, in relation to the use of GAI.	Quality Assurance Officer &, Heads of Programmes	2024/25	
Build a review of the implementation of the GAI policy into the BMus 2024/25 Periodic Programme Review.	Head of UG Programmes & UGPB	2024/25	

EIA approved: 14 October 2024.