Generative AI Procedure	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Data - Chief Operating Officer - Compliance Committee
Is the Procedure for internal use only (Non-disclosable) ?	Disclosable
Associated Policy Statements:	Our Colleagues - Chief Operating Officer Our Education - Pro-Vice Chancellor, Education Our Operations – Chief Operating Officer Our Research and Innovation - Pro-Vice Chancellor, Research and Innovation
Authorised Owner:	Chief Information Officer
Authorised Co-ordinator:	Head of Governance
Effective date:	18/12/2025
Due date for full review:	December 2026
Sub documentation:	TBC

Approval History

Version	Reason for review	Approval Route	Date
V1.0	New Procedure	Compliance and Data Committee	18/12/2025

1. Purpose

1.1. Generative Artificial Intelligence (GenAI) is redefining the way society, research, education, and professional practice evolve. At the University of Surrey, we are committed to leading its responsible and innovative application.

1.2. This procedure sets out how GenAI tools may be used within the University to support teaching, research, and operations, while protecting information, complying with legal and regulatory requirements, and maintaining academic and professional integrity.

1.3. We encourage the informed and responsible use of GenAI. Our aim is for all at the University to feel empowered to use GenAI in an informed and safe way and in line with our core values.

1.4. All users must read and understand this procedure before engaging with any form of GenAI during University work. Check the SURREYNET site for up-to-date information and guidance on the use of GenAI at the University - Artificial intelligence at Surrey | Surreynet

2. Scope and Exceptions to the Procedure

2.1. This applies to:

2.1.1. All University of Surrey employees, subsidiaries, contractors, visiting researchers and temporary employees

2.1.2. All GenAI use for university related work, teaching, research and administration

2.1.3. The design, development, or deployment of GenAI enabled products or services within the University context

2.2. This is the overarching procedure on GenAI at the University. Other AI related guidelines, support information, training material are produced from time to time and are available on the AI page on SURREYNET Artificial intelligence at Surrey | Surreynet

3. Definitions and Terminology

3.1. Generative AI: An AI system, tool, or facility that generates new outputs in a range of possible formats such as text, images, or sounds (including for example music, singing, voice narration).

3.2. Public/Open GenAI: AI services available via the internet that are not hosted or controlled by the University.

4. Procedural Principles

4.1. **Three Golden Rules**

4.2. Any use of GenAI tools at the University should be done following the University's three golden rules. ACT

4.3. **Accountable** - Take responsibility for GenAI-assisted work; apply human oversight and verify outputs.

4.3.1. Human oversight: GenAI tools are not always going to get it right and cannot be held accountable. It is essential to verify GenAI-generated results and understand the limitations of the tools being used.

4.3.2. Enhancing, not replacing: Use GenAI to increase efficiency and support human decision-making rather than replacing critical judgment. This ensures that expertise and context are applied to the results.

4.3.3. Environmental impact: Understanding the environmental footprint of GenAI tools encourages responsible usage and consideration of sustainability.

4.4. **Considered** – avoid inputting sensitive data into unapproved tools; assess bias and accuracy risks.

4.4.1. Protect Information: To reduce the risk of data breaches and misuse, personal, confidential, and commercially sensitive information (including Intellectual Property) must NOT be entered into GenAI tools—internal or external— unless they are approved by IT Services and meet the organisation's security and compliance requirements.

4.4.2. Mindful input: Being cautious about what you input into GenAI tools is crucial because GenAI generates responses based on its training data, which may not always be accurate or appropriate.

4.4.3. Bias awareness: Recognising and mitigating biases in GenAI models helps prevent discrimination and ensures fair outcomes.

4.5. **Transparent** – Clearly label and reference GenAI-generated content where applicable.

4.5.1. Transparency: About the use of GenAI fosters trust and accountability.

4.5.2. Referencing GenAI: Clearly labelling GenAI-generated content helps users understand the source and context of the information.

4.6. The use of GenAI tools at the University will be done so in line with the AI principles the University has adopted.

4.6.1. **Commitment to People-Centred AI**

4.6.1.1. The use of GenAI at the University must serve the interests of individuals and society, enhancing wellbeing, safety, and opportunity while empowering users with oversight and choice.

4.6.2. **Ethical Standards**

4.6.2.1. All use, and development must be lawful, transparent, and respectful of human dignity, in line with the UN Sustainable Development Goals and the UK's AI governance principle**s.**

4.6.3. **Promoting Inclusion & Diversity**

4.6.3.1. The University values diversity in GenAI development and use and will actively promote inclusive collaboration across disciplines, backgrounds, and experiences. Teams engaged in GenAI related work must foster equitable participation to ensure GenAI tools and systems are fair, representative, and beneficial, avoid reinforcing bias or discrimination, and be accessible to all.

4.6.4. **Ensuring Responsible and Sustainable Deployment**

4.6.4.1. GenAI technologies must be deployed responsibly and safely, with clear consideration of their societal and environmental impact. Engagement with internal and external stakeholders, including staff, students, policymakers, industry, and the public will be integral to shaping responsible GenAI practices and outcomes.

4.6.5. **Embedding Transparency and Accountability**

4.6.5.1. Clearly disclose when GenAI has contributed significantly to an output, ensure traceability, and take responsibility for decisions informed by AI.

4.6.6. **Establishing Responsible Governance & Oversight**

4.6.6.1. Follow University and regulatory frameworks for the ethical use of AI, including risk assessment, approval, and monitoring of GenAI use. This includes recognising that any use of GenAI in research involving personal data requires prior ethics approval.

4.6.7. **Fostering Lifelong Education and Adaptability**

4.6.7.1. The University will promote continuous learning and the integration of evolving best practices in GenAI across its community. Staff will be supported through training and awareness programmes to remain informed about current developments in GenAI ethics, safety, and regulation, ensuring adaptive and responsible innovation.

4.7. **Approved tools**

4.8. The University helps protect our data and systems by maintaining a list of approved tools that meet our security and compliance standards. Before using any GenAI or digital tool, staff must check that it appears on this approved list, regardless of how they access it — via software, web platform, mobile applications, or embedded operating system feature.

4.9. Users are accountable for ensuring that any built-in or default GenAI functionality on device is approved for handling University data and configured in line with security and compliance requirements.

4.10. If you wish to propose a new tool or enable a GenAI feature for University use, please ensure it first goes through the appropriate assessment process — including a Vendor Risk Assessment (VRA) and a Data Protection Impact Assessment (DPIA) — before contacting IT Services. Once assessments are complete, requests can be submitted via the IT Service Desk for review and implementation. Any GenAI-related tools, e.g. AdBlock, Grammarly, Adobe Flash, or software should only be installed, connected, or enabled on University devices or networks once approved through this process.

4.11. Any AI generated code for use within approved systems needs to be reviewed in line with established code review practices before deployment.

4.12. **User responsibilities**

4.13. When using GenAI tools, you are responsible for:

4.13.1. Policy adherence: Follow all relevant University policies and guidance including the above ACT guidance.

4.13.2. No prohibited data: Avoid entering Personal, Restricted and Confidential data prohibited data into any Public/Open GenAI system.

4.13.3. Purpose alignment: Use approved tools only for purposes consistent with your role and organisational objectives.

4.14. **Data protection & privacy**

4.15. All use of GenAI tools must comply with applicable UK Data Protection legislation and University policies. For definitions of personal, restricted and confidential, and for detailed handling requirements, see the Data Protection Guidelines.

4.16. **Expected behaviours and example misuse cases**

4.17. All members of the University community share responsibility for using GenAI tools in ways that protect information and uphold our security standards. To support this, please avoid the following practices:

4.17.1. **Misuse of GenAI**: Including, but not limited to:

4.17.2. Plagiarism or submitting AI generated work as your own without proper attribution.

4.17.3. Amplifying bias or producing discriminatory, harmful, or unsafe outputs.

4.17.4. Misrepresenting AI generated content as wholly human authored.

4.17.5. Generating content that breaches legal, ethical, or University standards.

4.17.6. **Inappropriate purpose**: Using GenAI for activities unrelated to legitimate University business, teaching, learning, or approved research using University provided facilities.

4.17.7. **Safeguarding on personal devices**: Users are accountable for safeguarding University data when using personal devices. Using personal devices or personal accounts to conduct University business via GenAI tools without explicit approval is prohibited.

4.17.8. **Uncontrolled code use**: Introducing code generated by GenAI systems into the University's general technology environment is prohibited unless it has undergone prior review and approval in line with established code review practices. In isolated teaching environments (e.g., sandboxed labs or controlled learning platforms), GenAI generated code may be used where explicitly authorised and subject to appropriate safeguards.

4.18. **Integrity & ethics**

4.19. When using GenAI in research:

4.19.1. **Disclosure**: Disclose any use of GenAI tools in work produced and particularly in research proposals, publications, and outputs, in line with University Policy.

4.19.2. **Ethical review**: Ensure AI assisted generated output complies with ethical review processes and relevant legislation.

4.19.3. **Verification**: Verify the accuracy and originality of AI generated content before inclusion in any outputs.

4.19.4. Rights and licences: Ensure training data and model use respect copyright, licensing, and consent requirements, and that ethical considerations are applied where GenAI is used to create, modify, or represent real people.

4.20. **Compliance**

4.21. Breaches of this procedure may result in disciplinary action in line with University procedures.

4.22. **Monitoring**: Use of GenAI tools on University systems, networks or accounts is subject to the University's Acceptable Use Procedure and in accordance with the University's Monitoring Procedure and applicable law.

4.22.1. **Passive monitoring** may include the routine logging of access, usage patterns, and system events to ensure security, compliance, and operational integrity.

4.22.2. **Targeted monitoring** may be undertaken where there is a specific compliance, security, or investigative need, and may include reviewing the content of prompts and responses.

4.23. All monitoring will be conducted lawfully, proportionately, and in line with data protection requirements.

4.24. **Third party risk**

4.25. Before engaging external GenAI providers, ensure contracts include:

4.25.1. **Data** handling and retention: Terms aligned with University's data policy.

4.25.2. **Training restrictions**: Prohibitions on using University data for model training without explicit consent.

4.25.3. **Bias and transparency**: Commitments to bias mitigation and transparency.

5. Governance Requirements

5.1. **Implementation: Communication Plan**

5.1.1. The procedure will initially be communicated in line with the communications plan developed by the AI Operations Task and Finish group working with Market and Communications and HR Organisational Development. It will ensure all staff are aware of the procedure and will provide additional guidance and training. The SURREYNET AI Intranet page will be used for sharing of such information.

5.2. **Implementation: Training Plan**

5.2.1. Initial training advice, guidance, and materials on the use of the University's approved GenAI tools are being developed under the AI Operations Task and Finish Group. Once implemented, these resources will be maintained through established University governance and operational structures.

5.3. **Sustainability**

5.3.1. Environmental sustainability will be embedded within all University AI decision-making and governance. Recognising the high energy and water demands of AI technologies, the University will actively assess and report on the environmental impact of AI tools and services, using available Management Information and energy data. This information will guide decisions in partnership with the Head of Sustainability and other key stakeholders. The University will also promote responsible and efficient AI use by training staff to understand the environmental cost of AI activity and to make informed choices that minimise impact.

5.4. **Review**

5.4.1. This procedure will be reviewed annually, or sooner in response to regulatory changes, to remain aligned with emerging GenAI advancements and ethical considerations. The University will continue to adapt its approach to GenAI governance, ensuring that our research and training reflect the highest ethical and societal standards.

5.5. **Legislative Context and Higher Education Sector Guidance or Requirements**

5.5.1. The University will monitor development nationally and internationally regarding AI governance as this is still an emerging and maturing area, such as the EU AI Act.

6. Stakeholder Engagement and Equality Impact Assessment

6.1. The procedure has been developed with input from the AI Operations Task and Finish group with representatives from across the University and with engagement with the Surrey Institute for People Centred AI. An impact assessment will be completed before final submission for approval.

6.2. An Equality Impact Assessment was completed on 11/12/2025 and is held by the Authorised Co-ordinator.

6.3. Procedure communicated to all subsidiaries on 10/12/26.

6.4. Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact
Governance	Review of draft procedure	N	18/11/2025	Kelley Padley, Governance Officer
H&S	Review of draft procedure	N	18/11/2025	Matt Purcell, Director of H&S
Sustainability	Review of draft procedure	N	18/11/2025	Martin Wiles, Head of Sustainability
Academic Freedom of Speech	Review of draft procedure	N	18/11/2025	Josh Andresen, AFFE Sub-Committee rep
Operations Committee	Review of draft procedure	N	16/9/2025	Will Davies
PVC Education	Review of draft procedure	N	10/12/2025	Annika Bautz
PVC Research and Innovation	Review of draft procedure	N	10/12/2025	Lisa Collins