

Artificial Intelligence Usage Policy

PURPOSE

This policy outlines Keystone Training Groups' guidelines for the appropriate and responsible use of Artificial Intelligence (AI) and Generative AI (GenAI) technologies by staff and students.

The policy applies to all forms of AI, including general AI and Generative AI technologies used for educational and operational purposes. This includes any current or future AI technologies developed for similar purposes, even if not yet created at the time of this policy's writing.

SCOPE

This policy applies to all Keystone RTO staff and students and relates to:

- **Students:** Correspondence, assessments, projects, or any other written, visual, or digital content produced as part of their training or assessment. This includes work submitted through the RTO's learning management system or other approved platforms.
- **Staff:** Correspondence, documents, social media content, and any other written media created by staff either for the company's use or on behalf of, and/or for use by clients of the company.

This policy should be read in conjunction with the **Academic Integrity Policy**.

POLICY STATEMENT

Keystone is committed to:

- Leveraging AI and GenAI technologies to enhance educational outcomes, streamline operations, and foster innovation
- Ensuring ethical and responsible use of AI and GenAI by staff and students, while maintaining academic integrity and legal compliance
- Upholding core values of fairness, transparency, and accountability in all AI and GenAI applications
- Managing risks associated with AI use, including privacy, data protection, intellectual property, discrimination, and academic dishonesty
- Creating a positive environment where AI and GenAI contribute to the growth and development of students and staff, ensuring the integrity of the company.

POLICY

Legal and Regulatory Compliance (Staff Only)

All staff use of Artificial Intelligence (AI) and Generative AI (GenAI) within Keystone RTOs must comply with the following legal and regulatory requirements:

- **Intellectual Property Laws:** Ensure that AI and GenAI usage does not infringe upon copyrights, patents, or other intellectual property rights.
- **Privacy and Data Protection Laws:** Safeguard personal information and ensure compliance with privacy and data protection regulations.
- **Anti-Discrimination and Equal Opportunity Laws:** Prohibit the generation of content that is discriminatory, offensive, or violates equal opportunity principles.
- **Ethical Guidelines:** Adhere to established ethical principles and guidelines for AI and GenAI usage, including transparency, fairness, and accountability.

Risks and Detrimental Effects (Staff Only)

The use of AI and GenAI presents potential organisational, educational, and ethical risks. Staff must consider and manage these risks before integrating AI into training, assessment, or administrative activities.

Risks include:

- **Privacy:** Breaches of personal data, learner records, or staff information due to interaction with third-party AI tools not governed by Australian privacy laws.
- **Confidentiality:** Disclosure of sensitive RTO materials, such as assessment tasks or commercial information, through prompts or training data submitted to AI platforms.
- **Ethics and Morality:** Ethical concerns regarding fairness, integrity, and accountability in the use of AI, particularly in assessment and decision-making.
- **Contractual Obligations:** Potential breaches of licensing, copyright, or third-party agreements when using or reproducing AI-generated content.
- **Consumer Protection:** The risk that AI-generated responses may mislead students or result in non-compliance with advertising, enrolment, or assessment requirements.
- **Inclusivity:** The possibility of biased, non-inclusive, or culturally unsafe content being generated by AI tools, particularly in relation to gender, race, or disability.
- **Misinformation and Inaccuracy:** AI tools may produce factually incorrect, outdated, or fabricated information (“hallucinations”), which could misinform learners or compromise assessment validity.
- **Intellectual Property Infringement:** AI-generated content may unintentionally breach copyright by reproducing protected material, exposing the RTO or student to liability.
- **Dehumanisation of Content:** Overreliance on AI tools may remove personalisation, empathy, and context, leading to content that is impersonal, inappropriate, or culturally insensitive.
- **Academic Misconduct:** Unauthorised use of AI in assessments may result in breaches of academic integrity, including plagiarism, misrepresentation, collusion, or contract cheating. Students may fail to meet competency requirements if submitted work is not their own or lacks authenticity.
- **Diminished Learning Outcomes:** Excessive or improper use of AI may hinder the development of essential critical thinking, problem-solving, and communication skills expected of competent graduates.
- **Assessment Integrity:** AI can be used to generate answers, complete assessments, or falsify evidence in ways that compromise the reliability and authenticity of assessment outcomes.

Student Usage

Students are expected to act with honesty, transparency, and accountability when using AI tools as part of their learning.

AI may assist with understanding concepts or improving communication, but assessments must demonstrate the student's own competence.

Acceptable use

Students may use AI and GenAI tools for educational purposes within the context of their course. Student assessment responses must reflect their understanding of knowledge evidence, not their ability to use AI tools.

Students may use AI tools to:

- Check grammar or structure
- Explore or clarify ideas and terminology
- Summarise complex information for study purposes
- Support reflection or draft preparation.

When AI is used:

- The student must acknowledge the tool (e.g. "Generated using ChatGPT for grammar suggestions")
- All content must be reviewed, verified, and rewritten in the student's own words
- Submissions must reflect the student's authentic understanding and skills.

Unacceptable use

Students must not use AI and GenAI in activities that are unethical, illegal, or violate intellectual property rights, or generate or complete their assessment submissions unless the assessment or Assessor has given written permission.

Student assessment responses must reflect their understanding of knowledge, evidence, and not their ability to use AI tools.

Students must not:

- Submit AI-generated content as their own work
- Use AI to complete or substantially generate assessment responses
- Employ AI to falsify evidence or impersonate another individual
- Use AI to produce or distribute offensive, discriminatory, or misleading material.

Undeclared or misleading use of AI constitutes academic misconduct and will be managed under the **Academic Misconduct Procedure**.

Assessors may use plagiarism or AI-detection tools to confirm authenticity.

Staff Usage

Staff may use AI and GenAI tools to support administrative, training, assessment, and quality assurance activities, provided such use aligns with organisational policies, ensures data privacy, and upholds educational integrity.

The use of AI must not replace professional judgement, breach confidentiality, or compromise the authenticity of assessment or training content.

Appropriate applications

Staff members may use AI and GenAI tools for the following purposes:

- Drafting educational materials or outlines for review
- Conducting research or summarising information sources
- Enhancing operational efficiency (e.g. data organisation or routine communication)
- Staff remain accountable for validating the accuracy, relevance, and appropriateness of any AI-assisted content.

Staff must ensure that any content generated using AI or GenAI tools complies with intellectual property rights, including copyrights and other protections.

Ownership and attribution

The intellectual property rights for content generated using AI or GenAI tools remain with Keystone. Staff-generated content is owned by Keystone, and the company retains the right to use or publish such content for educational or promotional purposes, with appropriate attribution.

Compliance and Breaches

All students and staff are required to comply with this policy and adhere to the guidelines herein. Compliance with all relevant legal, regulatory, and ethical requirements is mandatory.

Consequences of misuse

Non-compliance with this policy may result in disciplinary actions, which may include:

- **Students:** Warnings, academic penalties, loss of privileges, or termination of enrolment, depending on the severity of the violation as per the **Academic Misconduct Procedure**.
- **Staff:** Disciplinary action as per the **Performance Management Procedure**.

Quality Management

This policy forms part of our **Quality Management System (QMS)**. It is reviewed annually in accordance with the **Internal Audit Procedure** and is supported by ongoing quality assurance activities. Additional reviews may occur based on risk, feedback, or regulatory change.

Records related to this policy must be maintained as per the **Records Management Policy**. Documents must be version-controlled, stored in approved systems, and retained for audit, compliance, and quality assurance purposes.

Non-compliances, risks, issues and improvements are recorded and addressed in line with the **Continuous Improvement Policy**. Staff must submit a **Continuous Improvement (CI) Request** to raise concerns or suggest improvements.

RESPONSIBILITIES

Chief Executive Officer (CEO)	<ul style="list-style-type: none"> • Ensure that this policy aligns with strategic goals, operational needs, and legal compliance requirements across all Keystone RTOs • Ensure all staff, students, and relevant stakeholders are informed about the policy, their obligations under it, and the consequences of policy violations.
Quality and Compliance Manager	<ul style="list-style-type: none"> • Ensure this policy is enforced consistently across all Keystone RTOs. • Regularly audit the use of AI tools to ensure compliance with the policy and take corrective action when required. • Provide training and resources to staff and students on the ethical use of AI and the expectations outlined in the policy. • Conduct an annual review of the policy to ensure it remains current with legal, technological, and industry developments.
Managers	<ul style="list-style-type: none"> • Oversee the implementation of this policy across all teams. • Ensure staff are aware of their responsibilities and expectations are consistently reinforced.
Trainers and Assessors	<ul style="list-style-type: none"> • Implement this policy during assessments, coursework, and all student interactions involving AI. • Inform students about the responsible use of AI, including the importance of academic integrity, at the start of each course. • Identify and report any potential AI misuse or violations of the policy to management.
Students	<ul style="list-style-type: none"> • Use AI responsibly in alignment with this policy and academic integrity guidelines. • Seek clarification where unsure about the use of AI in training and assessment activities.

DEFINITIONS

Academic Integrity	The commitment to honest, fair, and responsible conduct in educational activities, including the completion of assessments, submission of original work, and acknowledgment of sources.
Academic Misconduct	Behaviour that breaches the principles of academic integrity, including plagiarism, cheating, use of unauthorised assistance (such as AI tools where not permitted), falsification of records, or misrepresentation of one's work.
Artificial Intelligence (AI)	The simulation of human intelligence by computer systems and software, capable of performing tasks such as problem-solving, content generation, decision-making, and language processing. Examples include generative tools like ChatGPT, Grammarly, and AI-assisted writing or coding tools.
AI-Assisted Work	Content that has been created or edited with the use of AI tools. The user remains responsible for reviewing, validating, and ensuring compliance with academic and ethical standards.
Assessment Authenticity	The requirement that assessment evidence must be the student's own work, demonstrating their skills and knowledge. RTOs must verify authenticity through direct evidence, observation, or supplementary validation (e.g. questioning).
Disclosure	A student or staff member informing the RTO when AI has been used to assist in completing work. Disclosure does not necessarily imply misconduct but may be required for transparency or compliance.
Generative AI	A subset of AI technologies that generate new content (e.g. text, images, code, audio) based on prompts or existing data. In an RTO context, this includes tools that may assist students or staff in creating assessment responses, feedback, or training materials.
Plagiarism	Presenting another person's work, ideas, or generated content (including from AI tools) as one's own without proper acknowledgment. This includes copying, paraphrasing, or reusing AI-generated text without attribution where required.
Referencing	The practice of acknowledging the original sources of information, ideas, words, or data used in a piece of academic work, by clearly and consistently documenting them using an accepted referencing style.
Registered Training Organisation (RTO)	A training provider registered by a state or national regulatory body, authorised to deliver and assess nationally recognised training in Vocational Education and Training (VET).
Staff	Refers to all individuals employed or engaged by the RTO (either directly or under contractual arrangements) who contribute to the operations, delivery, support, or management of training and assessment services.
Student	Person receiving training and/or assessment services provided by an RTO, or by a third-party on their behalf, and includes learners, participants, candidates and trainees.
Warning	A formal notice given to a learner or staff member following a breach or suspected breach of policy, particularly on a first occurrence, outlining the concern and steps required to rectify the issue.

RELATED DOCUMENTS

Internal

Policies	<p>Academic Integrity Policy</p> <p>Assessment System Policy</p> <p>Code of Conduct</p> <p>Diversity and Inclusion Policy</p>
Procedures	<p>Academic Misconduct Procedure</p> <p>Assessment Procedure</p> <p>Instructional Design Procedure</p> <p>Performance Management Procedure</p> <p>Training Delivery Procedure</p>
Guides	<p>AI Integration and Compliance Guidelines</p> <p>Student Handbook</p> <p>Trainer and Assessor Handbook</p>
Forms and Templates	<p>Academic Misconduct Report Form</p> <p>AI Detection Tool Report</p> <p>AI Usage Acknowledgement Form</p> <p>Disciplinary Action and Outcome Report</p> <p>Student Warning Notice</p>
Systems	<p>Canvas LMS</p> <p>Quality Management System (QMS)</p> <p>Risk Register</p> <p>Student Management System (SMS)</p>

External

Legislation	<p>National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025 (1.4a, 1.4b)</p> <p>National Vocational Education and Training Regulator Act 2011</p> <p>Privacy Act 1988</p> <p>Australian Privacy Principles</p> <p>Competition and Consumer Act 2010</p> <p>Copyright Act 1968</p> <p>Fair Work Act 2009</p> <p>Notifiable Data Breaches (NDB) Scheme</p> <p>Intellectual Property Laws</p>
Resources	<p>TEQSA: Assessments and academic integrity</p> <p>TESQA: Gen AI knowledge hub</p> <p>TEQSA: Artificial intelligence: advice for students</p>