

OTHM Managing Use of Artificial Intelligence Centre Guidance



1. Introduction

Artificial Intelligence (AI) has the potential to enhance learning and improve efficiency across the education sector. However, its increasing accessibility also introduces new risks to the integrity and authenticity of assessment outcomes. OTHM is committed to ensuring that qualifications remain a fair and valid reflection of a learner's own knowledge, understanding, and skills.

This policy outlines OTHM's expectations for the ethical and transparent use of AI within education and assessment. The policy aims to uphold public confidence in OTHM qualifications and to support centres in adopting responsible and proportionate approaches to AI management.

2. Defining Misuse

OTHM defines misuse, in the context of Artificial Intelligence, as any action that undermines the integrity and authenticity of learner assessments. Misuse can involve intentional and unintentional activities that breach qualification standards and the expectations of independent work.

Examples of misuse include:

- Unacknowledged AI use: Submitting AI-generated content without proper acknowledgement, whether copied verbatim or paraphrased.
- Over-reliance on AI: Using AI tools to perform tasks that demonstrate understanding, analysis, or skill without demonstrating the learner's knowledge and abilities.
- Manipulating AI content: Altering AI-generated outputs to disguise their origin or falsely present them as original work.
- Misleading citations: Providing incomplete, fabricated, or unverifiable references to AI sources or outputs.
- Breach of assessment objectives: Using AI to address assessment criteria in ways that do not demonstrate independent understanding or competence.
- Unauthorised AI use: Employing AI tools in contexts where their use is prohibited, such as during closed-book examinations or other controlled assessments.
- AI sole decision-making: Using AI tools to independently generate answers, solutions, or creative content without learner contribution or validation.
- Falsification of declarations: Signing authenticity declarations while knowingly submitting AI-influenced work without acknowledgement.

These actions constitute malpractice as defined by OTHM and regulator frameworks, and they may attract sanctions or other monitoring activities (see OTHM Sanctions Policy).

3. Centre Policies

Approved Centres should update malpractice and maladministration policies to include definitions and examples of AI misuse, and guidelines on the acceptable and unacceptable use of AI tools. Policies should ensure that AI misuse is regarded as plagiarism, with clear consequences for learners.

4. Training and Awareness

Centres should provide targeted training sessions for staff and learners on the ethical use of AI, risks of misuse, and proper acknowledgement requirements. Centres should make use of AI and plagiarism-detection software wherever possible and ensure that assessors and IQAs are trained in their use and made aware of their limitations. Any software used for this purpose should be part of a broader approach to verifying authenticity of learner work.

5. Examples of Acceptable and Unacceptable Use

Acceptable Use:

- Using AI as a mind-mapping tool for generating ideas or structuring content with proper acknowledgement, where idea generation is not the focus of assessment.
- Utilising AI for basic language translation or grammar checking, provided it does not substitute the learner's skills or understanding.

Unacceptable Use:

- Submitting AI-generated responses as the primary or sole evidence for meeting assessment criteria.
- Using AI outputs without validation or acknowledgement.
- Relying on AI to generate answers, solutions, or creative outputs that bypass the learner's independent contribution.

6. Centre Guidance for Managing Misuse of AI

Centres should establish clear strategies for monitoring learner work for misuse of AI, but may consider the following guidance as appropriate.

Indicators in Written Work

- Sudden quality improvements: Assignments may display grammar, structure, or vocabulary levels inconsistent with those of a learner's prior work.
- Generic and formulaic tone: AI-generated responses often provide broad, un-contextualised statements without depth or nuance.
- Incorrect use of terminology: AI may misuse technical language or introduce irrelevant jargon.
- Outdated or inaccurate content: AI-generated submissions may reference outdated laws, policies, or practices.
- Inability to reference sources: AI use might lead to gaps in understanding, with learners unable to justify their arguments or identify sources used.

Strategies to Verify Suspected AI Use

- Conduct oral discussions: Engage learners in discussing or defending key submission elements to gauge understanding.
- Request supporting evidence: Ask learners for drafts, notes, or research plans demonstrating their thought process.
- Comparison to past work: Review prior assignments for discrepancies in style, analytical depth, or technical ability.
- Set a baseline: As part of the initial assessment process, ask learners to write a few paragraphs on a suitable topic. This can then be used to compare writing styles going forward.

Technological Tools

- AI detection software: Use tools such as Turnitin's AI Writing Detection, GPTZero, or Grammarly to analyse text for AI characteristics. AI detection tools can be helpful, but they should be used as part of a broader authentication strategy.
- Plagiarism checkers: Cross-check submissions against online sources and repositories to identify copied or generated content.

7. The Role of the Awarding Organisation

OTHM will continue to work with regulatory bodies to ensure policy consistency, and to incorporate sector-wide feedback into periodic updates to AI-related guidance documents and policies. OTHM will periodically provide webinars and sector updates on responsible AI use.

By adopting the guidance within this policy, Approved Centres can help safeguard the credibility of learner achievement and maintain compliance with regulatory requirements. OTHM will continue to review and update its approach as AI technologies and sector expectations develop, ensuring that learners, centres, and stakeholders are supported in navigating this changing landscape.

8. Regulatory References

- **A1:** Suitability for continuing recognition
- **A4:** Conflicts of Interest
- **A5:** Availability of adequate resources and arrangements
- **A6:** Identification and management of risks
- **A7:** Management of incidents
- **A8:** Malpractice and maladministration
- **B3:** Notification to Ofqual of certain events
- **C1:** Arrangements with third parties
- **C2:** Arrangements with Centres
- **D1:** Fitness for purpose of qualifications
- **D3:** Review approach
- **D7:** Making available information to help meet Teachers' needs
- **E4:** Ensuring an assessment is fit for purpose and can be delivered
- **G1:** Setting the assessment
- **G8:** Completion of the assessment under the required conditions
- **G9:** Delivering the assessment
- **H1:** Marking the assessment
- **H2:** Centre Assessment Standard Scrutiny where assessment is marked by a Centre
- **H5:** Results for a qualification must be based on sufficient evidence
- **I1:** Appeals process

9. Version Control

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1.0	November 2025	New
1.1	December 2025	Added Regulatory References