

Artificial Intelligence (AI) and Use in Assessment Guidance

1.1

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Introduction

Gateway Qualifications supports responsible adoption of Artificial Intelligence (AI) to enhance teaching, learning and assessment while protecting integrity, validity and public confidence in qualifications. This guidance sets out clear expectations for acceptable and prohibited AI use across assessment design, delivery, marking/feedback, quality assurance and investigations. It also explains how this guidance relates to our Malpractice and Maladministration Policy and Procedure.

Generative AI offers opportunities (e.g., content creation, personalised feedback, innovative assessment methods, assistive technologies) and also presents risks (e.g., misinformation, bias, authenticity challenges, misuse). All AI use must remain consistent with good practice and must not enable unethical or improper use.

Regulatory Expectations

Gateway Qualifications is regulated by Ofqual, Qualifications Wales, and the Quality Assurance Agency (QAA). Each regulator has set clear expectations for the responsible, transparent and fair use of AI within assessment.

- **Ofqual** requires awarding organisations to maintain fairness, validity, assessment security, public confidence and appropriate innovation when considering AI use in qualifications. Its regulatory approach makes clear that AI cannot replace human judgment in marking and must not compromise the integrity of assessment decisions.

Useful link: [Ofqual's approach to regulating the use of artificial intelligence in the qualifications sector - GOV.UK](#)

- **Qualifications Wales** highlights both the opportunities and risks of AI. Its updated position statement emphasises the need to protect authenticity, public confidence, equality of opportunity, and to ensure that assessment processes remain secure and sustainable as AI capabilities evolve.

Useful link: [Our updated position statement on artificial intelligence | Qualifications Wales](#)

- **QAA** expectations for Access to HE Diplomas require providers to have clear and effective academic-integrity processes. QAA guidance on generative AI stresses the importance of ensuring that learners understand the acceptable and unacceptable uses of AI, and that providers have clear procedures for preventing, detecting, and addressing academic misconduct, including misconduct arising from inappropriate or undeclared AI use.

Useful link: [QAA advice and resources](#)

This guidance brings these regulatory expectations together into a single, practical framework to support Centres/Providers in using AI responsibly, maintaining assessment integrity, and ensuring fairness, transparency and learner/apprentice confidence across all qualifications.

Audience

This document is intended for:

- Recognised Centres (“Centres”) in relation to the offer of qualifications – including all Centre staff, associates, freelance staff and contractors
- Apprenticeship Training Providers (“Providers”) in relation to apprenticeship assessment – including all staff, associates, freelance staff and contractors
- Learners/Apprentices - to understand acceptable and prohibited AI use.
- Gateway Qualifications’ Board of Trustees and Committee members
- Gateway Qualifications’ staff
- Gateway Qualifications’ wider workforce – including consultants, qualification developers, assessment.

Scope

This guidance supports responsible, compliant and transparent use of AI across assessment design, delivery, marking/feedback, quality assurance and investigations. It applies to all Gateway Qualifications’ products (regulated and non-regulated) and should be read alongside our qualification specifications and other related documents including our policies and assessment guidance. Qualification-specific rules as detailed in our qualification specifications, relating to assessment and the permitted use of AI take precedence over this guidance.

Use of terminology: Centres and Providers

- Where guidance applies only to regulated qualifications, we use Centres.
- Where it applies only to Apprenticeship Assessment, we use Providers.
- Where guidance applies to both, we use Centres/Providers.

Definitions

- **Accessibility AI:** AI or assistive technologies used as part of reasonable adjustments for Learners/Apprentices with additional needs (e.g., text-to-speech).
- **Adverse Effect** - A situation that harms learners, affects our ability to deliver qualifications properly, lowers qualification standards, or damages public confidence. See full definition in the [Malpractice and Maladministration Policy](#) (Definitions section).
- **Artificial Intelligence (AI):** Artificial intelligence (AI) is technology that can carry out tasks normally requiring human intelligence. This includes systems that can

recognise patterns, process information, learn from data, make decisions, or generate content.

- **Academic misconduct:** A specific form of learner/apprentice malpractice. It refers to any action by a Learner/Apprentice intended to gain an unfair advantage or misrepresent their work. For the purposes of this guidance, academic misconduct is deemed malpractice and includes, but is not limited to:
 - **plagiarism** – presenting another person’s work or ideas as one’s own without proper attribution
 - **collusion** – unauthorised collaboration between Learners/Apprentices on individual assessments
 - **contract cheating** – submitting work completed by a third party, including essay mills or paid services
 - **impersonation** – arranging for another person to complete an assessment on the learner’s behalf
 - **misuse of generative AI** – using AI tools to produce work that does not reflect the learner’s own understanding, or failing to declare or acknowledge AI assistance where required
- **AI-assisted marking:** Use of AI tools to support assessors in drafting feedback or highlighting features/patterns. A human assessor remains accountable for all marks and feedback.
- **Assessor:** A person who uses assessment criteria to make judgements about the level of attainment a Learner/Apprentice has demonstrated in an assessment.
- **Authentication:** Processes to confirm that assessment evidence is the Learner/Apprentice’s own work, produced under the required conditions.
- **Generative AI:** Models that generate new content (text, images, audio, video) based on prompts and training data.
- **Malpractice:** Intentional or reckless actions that breach rules, cause unfairness, or compromise the integrity of assessments or qualifications. This also includes failing to report concerns or failing to cooperate with Gateway Qualifications’ investigations. See full definition in the [Malpractice and Maladministration Policy](#) (Definitions section).
- **Maladministration:** Mistakes, poor processes, or unintentional errors caused by carelessness, inexperience, or incompetence. See full definition in the [Malpractice and Maladministration Policy](#) (Definitions section).
- **VARCS Principles of Assessment:** A set of core principles used to judge whether assessment evidence is fit for purpose. When considering any use of AI in learning or assessment, Centres must ensure it does not compromise:
 - Validity – the assessment measures what it is intended to measure.
 - Authenticity – the work is demonstrably the learner’s/apprentice’s own.
 - Reliability – assessment decisions are consistent and can be replicated.
 - Currency – evidence reflects current skills, knowledge or practice.
 - Sufficiency – enough evidence is provided to meet the required outcomes.

Responsibilities

- **Gateway Qualifications:** Set and maintain this guidance document, ensuring alignment with regulatory requirements from Ofqual, Qualifications Wales, and QAA for Access to HE. It monitors compliance through quality assurance activities, investigates malpractice, and applies sanctions where necessary. Gateway

Qualifications reviews and updates these principles at least annually or when regulatory guidance changes.

- **Centres/Providers:** Responsible for training staff on ethical and compliant AI use and for communicating acceptable and prohibited AI practices to Learners/Apprentices. Centres/Providers must maintain audit trails of AI use in assessment design, delivery, marking, and feedback, and ensure the confidentiality of assessment materials is protected.
- **Assessors and IQAs:** Ensure the authenticity of Learner/Apprentice evidence and apply professional judgement when reviewing AI-assisted outputs against the mark scheme. They document when and how AI is used in marking or feedback, monitor for bias to ensure fairness, and use detection tools responsibly as part of a holistic approach, never as sole evidence.
- **Learners/Apprentices:** Submit authentic work produced under the required conditions and declare any AI use, including the tool used, its purpose, and its relevance to the assessment or job role. Learners/Apprentices follow all Centre/Provider rules on acceptable and prohibited AI use.

Related Documents

- [Centre Guide to Internal Assessment](#)
- [Equity Diversity and Inclusion Policy](#)
- [Malpractice and Maladministration Policy and Procedure](#)
- [Sanctions Policy](#)
- [Safeguarding Policy](#)

Other Reference Documents

- [JCQ AI Use in Assessments](#)
- [Using AI in education: support for school and college leaders - GOV.UK](#)
- [Artificial intelligence – The Ofqual blog](#)
- Ofqual resources: [Classroom discussion guide - AI and coursework v2.4.pdf](#)
- Ofqual resources: [SLT briefing pack- AI and coursework integrity v2.5.pdf](#)

How to Use This Guidance

This document provides principles and practical guidance to support the responsible and compliant use of Artificial Intelligence (AI) in assessment across all Gateway Qualifications' products and services. It is designed to be used by staff involved in assessment design, delivery, marking, internal quality assurance (IQA) and, where relevant, by learners and apprentices.

Understanding “must” and “could”

Throughout this guidance, we use:

- **“Centres/Providers must”** to indicate mandatory requirements that Centres or Providers are required to follow.

These reflect regulatory obligations, the Gateway Qualifications' Malpractice and Maladministration Policy, and essential measures needed to protect assessment integrity. We will monitor compliance through our quality assurance activities.

- **“Centres/Providers could”** to indicate additional considerations or recommended good practice.

These actions are not mandatory, but Centres/Providers may choose to adopt them to strengthen their approach, improve consistency, or reduce risk.

This distinction helps Centres/Providers clearly understand what is required and where they have flexibility in implementing local procedures.

Relationship with qualification-specific requirements

Gateway Qualifications offers a wide range of products including qualifications and apprenticeship assessment, each with its own rules on:

- how assessments must be set
- the conditions under which assessments must be taken
- what types of evidence are permitted
- what constitutes acceptable support or assistance.

This guidance applies across all qualifications (including bespoke accreditation) but does not override qualification-specific instructions as detailed in the qualification specification.

Centres/Providers must therefore always refer to the relevant qualification specification, standard specification, assessment guidance and any additional documentation (e.g., Centre Guide to Internal Assessment), as these take precedence where requirements differ.

Principle 1: Maintain Assessment Integrity

Case Usage – How AI Can Be Used in This Context

AI tools can support learners and staff in multiple ways, such as:

- helping learners brainstorm ideas, restructure paragraphs, or refine grammar
- assisting learners to generate images, data, code, or alternative explanations
- helping assessors identify themes or patterns in learner/apprentice work
- supporting centres to draft assessment materials, outlines or stimulus content (where permitted)

While these uses can improve efficiency and accessibility, they also create opportunities for AI-generated content to closely resemble authentic learner/apprentice evidence, particularly in written, portfolio-based, or unsupervised assessment contexts.

What the Risk Is

Improper, excessive or undeclared use of AI introduces a range of risks that directly threaten the integrity, fairness and credibility of assessment outcomes. These risks affect Learners/Apprentices, assessors, centres and the qualification system as a whole.

Validity Risk

- AI-generated responses may bypass the intended demonstration of knowledge, skills, behaviours or competence.
- This fundamentally undermines assessment validity, as the learner/apprentice has not evidenced the skills, knowledge or behaviours the assessment is measuring.

Authenticity Risk

- AI tools can generate full or partial assessment evidence, including written content, imagery, code, data and reflections. When AI-generated material is submitted as a learner's own work, authenticity is compromised, making it difficult to confirm that the learner/apprentice has genuinely met the required learning outcomes.
- All submitted learner/apprentice work must be demonstrably their own, and undeclared AI involvement constitutes malpractice.

Reliability Risk

- When assessment tasks are predictable, generic or rely on widely available prompts (e.g., standard essays, descriptive tasks or generic case studies), AI tools can easily generate sophisticated, high-quality responses.
- This weakens the ability of the assessment to differentiate between learners, reduces validity, and increases the burden on assessors to authenticate work.
- If assessors cannot distinguish AI-generated content from genuine learner/apprentice work, they may be unable to make reliable judgements. This threatens the consistency of marking decisions and may lead to unfair or inaccurate outcomes across cohorts.

These risks are significantly heightened in:

- unsupervised tasks completed independently
- portfolio-based assessments
- extended written tasks without checkpoints or draft stages

In these contexts, AI use may be harder to detect, easier to disguise, and more likely to influence the content of the final submission without assessor oversight.

Centres/Providers must:

Assessment Design

Where Centres use AI to support the creation of assessment materials:

- Centres must ensure that tasks align with learning outcomes, maintain required demand, are free from factual errors or bias, and remain secure.
- AI-generated content must never be used without thorough human quality assurance, and centres remain fully responsible for the validity and confidentiality of all assessment materials.
- All AI-generated content must be reviewed, adapted and validated by appropriately qualified staff.
- Refresh assessment briefs regularly to avoid predictable tasks that AI could easily complete.
- Avoid setting tasks that can be answered using generic AI prompts.
- Where Centres deliver units on using AI, set clear criteria on which elements may include AI-generated work, and which must be learner-produced.

Human Judgement and Assessor Accountability

- Ensure assessment decisions are always made by qualified human assessors.
- Ensure any AI-assisted marking or feedback outputs are subject to thorough review by qualified human assessors, who must always make the final assessment decision.
- Ensure assessors review and take responsibility for any AI-assisted outputs used in marking or feedback.

Authentication

- Implement learner/apprentice authentication measures, including declarations.
- Follow our Malpractice & Maladministration Policy when authenticity concerns arise.

Assessment Security and Data Protection

- Maintain secure handling of assessment materials to prevent uploading to public AI systems.

Centres/Providers could:

Assessment Design

- Refresh assessment tasks frequently to reduce predictability and mitigate AI-generated responses.

Authentication

- Use in-class drafting (where permitted), progress reviews or observations to support authenticity checks.
- Retain drafts or versions of learner/apprentice work to support authenticity checks.

Assessment Security and Data Protection

- Use controlled or internally hosted AI tools (if available) to reduce data leakage and improve consistency.

Example (Misuse)

Scenario:

A learner completing a reflective assignment uses an AI tool to generate full paragraphs describing personal experiences they did not actually have. The writing appears polished and detailed but does not match the learner's previous work or draft submissions.

Risk:

This compromises authenticity because the learner/apprentice has submitted evidence they did not produce. It also undermines validity, as the assessment requires personal reflection on real experience.

Principle 2: Provide Clear Guidance and Prevent Misuse

Case Usage – How AI Could Be Used in This Context

Learners, apprentices and staff increasingly use AI tools in everyday study, workplace tasks and digital workflows. AI could be used to:

- support learning (e.g., clarifying concepts, generating examples, summarising information)
- assist writing and assessment preparation (e.g., outlining, drafting, grammar enhancement, translation) where this does not conflict with the skills being assessed.
- support efficiency for staff (e.g., drafting learner/apprentice feedback, generating teaching materials, analysing patterns across submissions)
- provide accessibility support (e.g., text-to-speech, speech-to-text, simplification of text)

Where Centres determine that AI use is appropriate, these uses can enhance learning, accessibility and efficiency, provided they are carefully controlled, transparently declared, and do not pose risks to the VASCR principles.

However, without clear local rules, inconsistent messaging or limited staff knowledge, AI use can drift into:

- over-reliance
- inappropriate support
- partial or full automation of assessed work
- breaches of controlled conditions
- accidental malpractice

This makes explicit guidance and proportionate controls essential.

What the Risk Is

If AI use is unclear, ambiguous or poorly communicated, the risks include:

Authenticity and Malpractice Risk

- Learners/Apprentices may unintentionally (or deliberately) allow AI to generate, or rewrite assessed work, compromising authenticity and breaching assessment conditions.
- This aligns with concerns raised by our regulators that inappropriate, undeclared AI use constitutes malpractice and threatens the integrity of qualifications.
- Lack of clarity increases the number of borderline cases and suspected malpractice incidents, placing significant strain on centres/providers.

Fairness and Consistency Risk

- Inconsistent or unclear messaging about AI use can lead to unequal application of rules across different tutors, delivery teams, cohorts or assessment contexts.

- Where staff interpret permitted or prohibited AI use differently or communicate expectations inconsistently, learners may receive contradictory guidance, resulting in:
 - unfair differences in what support is allowed
 - confusion about acceptable practice
 - inadvertent misuse of AI by learners who believe they are following instructions
 - inconsistencies in how malpractice is identified or escalated

Centres/Providers must:

Clear Rules and Communication

- Publish a clear policy on AI use (standalone or within an assessment policy) and provide guidance for learners/apprentices.
- Explicitly state when AI use is permitted, restricted, or prohibited.
- Include AI expectations in learner/apprentice induction and programme handbooks.
- Explain AI use referencing requirements (see example in the box below).
- Define what constitutes AI misuse and malpractice, referencing Gateway Qualifications' Malpractice and Maladministration Policy.
- Ensure information is communicated to Learners/Apprentices and staff before an assessment begins.
- Explain potential consequences of improper use, including sanctions.

Recording AI Use

Centres/Providers must ensure that any permitted use of AI by learners/apprentices or staff is formally recorded. This enables transparency, supports IQA/EQA sampling, and ensures assessment decisions remain aligned with the VASCR principles.

Learners/apprentices must record their AI use by providing, as a minimum:

- the tool used (e.g., ChatGPT, Copilot)
- the purpose of use (e.g., idea generation, translation, accessibility support)
- the extent of use (e.g., summarising notes, drafting structure, checking grammar)

How declarations must be recorded:

- within the assessment submission itself (e.g., a short declaration at the end),

Staff must also record:

- any AI-assisted marking or feedback
- the extent of AI involvement
- confirmation that a qualified assessor reviewed and made the final judgement

All declarations must be stored with the assessment evidence and be available for sampling.

Staff Training and Consistency

- Train assessors, IQAs, tutors and administrators on:
 - permitted and prohibited AI use
 - identifying AI misuse
 - how to escalate concerns
 - limitations, bias, hallucinations and risks in AI outputs
 - their responsibilities in reporting malpractice
- Ensure consistent messaging across staff.

Use of Detection Tools

- Use AI-detection software only as supportive information, never as standalone proof.
- Supplement any detection flags with:
 - comparative performance analysis
 - draft review
 - questioning or interview
 - assessor's professional judgement
 - verification against known learner/apprentice ability
- Retain detection reports as part of the evidence base if an investigation is required.

Malpractice Investigation and Reporting

- Treat suspected misuse of AI as potential malpractice.
- Investigate impartially and thoroughly in accordance with Gateway's Malpractice and Maladministration Policy.
- Escalate and report suspected cases to Gateway Qualifications as required.
- Keep clear and complete records of concerns, evidence and outcomes.

Centres/Providers could:

Learner Induction and Ongoing Communication

- Provide scenarios/examples to help learners understand permitted vs prohibited use.
- Offer briefing sessions before assessment windows.
- Create dedicated FAQs for learners and staff. These could address common grey areas (e.g., "Can I use AI to paraphrase my own work?", "Can assessors use AI in feedback?").

Supporting Transparency and Declarations

- Provide short exemplar declarations for permitted AI use.
- Introduce 'Teach-back' activities for Learners/Apprentices to explain to staff where AI can and can't be used, how to declare AI use.

Assessment Practice and Staff Recording

- Provide templates for staff to record AI-assisted marking activities.
- Publish worked "good vs poor" examples of AI-assisted work.

Internal Quality Assurance and Risk-Based Controls

- Develop local risk assessments to focus controls on vulnerable areas.
- Build internal quality assurance prompts referencing AI risk. For example, IQAs could ask:
 - “Has the assessor confirmed what AI tools were used in drafting feedback, if any?”
 - “Is the learner’s declared AI use appropriate and consistent with task conditions?”
 - This strengthens internal reliability.
- Use low-stakes, formative assessments to practise permitted AI use.

Staff Training

- Offer staff “micro-CPD” on AI limitations, bias and hallucinations.
- Support staff to safely explore AI tools and build confidence in their use.

Example (Misuse – AI-Generated Portfolio Evidence)

Scenario

An apprentice is compiling their portfolio and is unsure how much support they can receive from AI tools. Their tutor gives informal, inconsistent advice, leading the apprentice to assume that using AI to “tidy up” or “speed up” their evidence is acceptable.

The apprentice begins inputting workplace tasks, reflections, and project descriptions into an AI tool and uses the generated text—often highly polished, generic, and overly technical—as their portfolio evidence. Some pieces describe practices or processes not used in their workplace, and others reference responsibilities the apprentice has never held.

During assessment, the work is submitted to Turnitin to check for AI use and identifies a high % is AI generated. The score flags a risk that prompts human investigation by an Assessor and the Assessor notes that several pieces of evidence do not match the apprentice’s job role, contain terminology far beyond their level, and lack detail about the employer’s actual procedures. The apprentice is unable to explain key elements of the portfolio, cannot relate statements back to their workplace, and contradicts what has been submitted.

Risk Explanation

The apprentice has submitted AI-generated content as if it were their own work. This compromises authenticity and reliability, undermines the validity of the assessment, and may result in malpractice investigations. Reliance on AI also prevents the apprentice from demonstrating the required knowledge, skills, and behaviours, and creates a risk of unfair advantage over peers who complete evidence independently.

Principle 3: Be Compliant

Case Usage – How AI Can Be Used in This Context

AI systems used within education and assessment settings may support staff and Learners/Apprentices in a wide range of ways, including:

- drafting learning materials, lesson content or assessment resources
- generating examples, explanations or structured outlines
- producing feedback drafts for assessors to refine
- transforming or reformatting text for accessibility
- automating administrative tasks such as scheduling, summarising or collating information
- providing learner/apprentice support via translation, text simplification or content clarification
- identifying broad themes or trends across cohorts for internal quality assurance

When used appropriately and with clear safeguards, these applications can improve efficiency, accessibility and consistency.

However, many commonly used AI tools are not designed for handling educational assessments, confidential materials or personal data, and therefore create significant compliance risks if used without adequate controls.

What the Risk Is

The use of AI in assessment and learning introduces multiple legal, ethical and data-protection risks that centres must manage carefully to remain compliant with statutory requirements and regulatory expectations.

Data Protection Risk

- Most publicly available AI tools process user inputs externally and may store or reuse data for training purposes.
- Entering personal data, sensitive information, or assessment content into these systems can breach the Data Protection Act 2018, UK GDPR, and the ICO's expectations on lawful, transparent processing of data.
- The ICO has highlighted that organisations must ensure AI systems are privacy-protective, transparent and accountable when used in education settings.
[\[ofqual.blog.gov.uk\]](https://www.ofqual.blog.gov.uk)

Confidentiality and Assessment Security Risk

- Assessment briefs, learner/apprentice evidence, or internal quality assurance materials uploaded into AI tools may be retained or repurposed by the model, compromising confidentiality and future assessment security.

Bias and Equality Risk

- AI outputs may contain bias, stereotyping or non-inclusive content.
- This can particularly disadvantage learners from specific groups or protected characteristics, conflicting with duties under the [Equality Act 2010](#).
- Regulatory commentary highlights that AI systems can amplify discriminatory patterns if not reviewed carefully. [[ofqual.blog.gov.uk](#)]
- Learners with greater access to advanced AI, better digital literacy or paid premium tools may gain unfair advantage over peers.

Accessibility Risk

- Some AI-generated content may present barriers for learners with disabilities (e.g., overly complex language, poor structure, inaccessible formats).
- Conversely, over-reliance on AI tools may exclude learners who have limited digital access if centres do not provide alternative options.

Inclusivity and Transparency Risk

- Many AI tools operate as “black box” systems, making it difficult to verify how outputs were produced or what data was used.
- This can undermine transparency and accountability, both of which are required expectations within qualification regulation.

Where These Risks Are Highest

Compliance risks increase when:

- Staff are unaware that entering personal or confidential data into AI tools is prohibited.
- free/public AI tools are used for assessment-related tasks.
- Learners/Apprentices submit personal reflections or sensitive information into AI systems.
- Centres/providers lack oversight of which AI tools are being used and by whom.
- Staff use AI to review learner/apprentice evidence or generate feedback without checking data-protection implications.

Centres/Providers must:

- Ensure all AI tools used within assessment or learning processes comply with UK GDPR and the Data Protection Act 2018, safeguarding personal and sensitive data.
- Implement secure practices when using external AI platforms, including:
 - avoiding input of any personal learner/apprentice data
 - checking platform privacy/security documentation
 - anonymising data wherever possible
 - restricting use to authorised staff only
 - using encrypted or institutionally approved systems
- Maintain audit trails documenting when, where and how AI tools are used for assessment or learning.

- Monitor AI-generated content for bias, discriminatory language or non-inclusive examples.
- Ensure that the use of AI does not disadvantage learners with disabilities or limited digital access, providing alternative formats or non-digital routes where needed.

Centres/Providers could:

- Adopt centre-approved AI tools that offer enhanced privacy and data controls (e.g., enterprise versions).
- Use encrypted or institutionally procured platforms for staff workflows involving any sensitive or assessment-related content.
- Conduct periodic internal compliance audits to check how AI tools are being used across teaching, learning and assessment activities.
- Maintain a local register of AI tools used within the centre, including their purpose, risk rating, and approval status.
- Develop staff-facing guidance on safe prompting, data minimisation, and avoiding high-risk tool behaviours (e.g., uploading evidence or personal data).
- Provide staff with decision trees or quick-reference guides on whether a tool is compliant for a given use case.

Example (Misuse – Vocational Qualification Assessment Evidence Entered into AI Tool)

Scenario

A learner on a Level 3 vocational qualification uploads their workplace logbook — including supervisor comments, client details and assessment criteria — into a public AI tool to “improve the written quality” before submitting it as evidence. The AI rewrites several sections and stores the uploaded material.

Risk

This breaches data protection and confidentiality requirements, as personal and assessment-related information has been shared with an uncontrolled system. It also compromises assessment security and authenticity, as AI-generated text has replaced genuine learner evidence.

Principle 4: Support Transparency and Accountability

Case Usage – How AI Can Be Used in This Context

AI tools may be used by learners, apprentices, assessors, IQAs, tutors, EQAs and administrative staff during:

- Learning and teaching (e.g., simplifying text, generating examples)
- Assessment preparation (e.g., drafting ideas, checking grammar)
- Marking and feedback (e.g., drafting comments, summarising themes)
- Quality assurance (e.g., analysing sampling patterns, summarising findings)
- Administration (e.g., automating communication or organising documentation)

These uses can improve clarity, efficiency and consistency but only when transparent, well-documented, and supported by clear accountability.

Without this, AI use becomes difficult to monitor and can undermine trust in assessment decisions.

What the Risk Is

A lack of transparency or poor record-keeping can create several risks:

Lack of Auditability

- If Learners/Apprentices do not declare when AI has been used (where required by the centre/provider policy), centres/providers cannot confirm that submitted evidence is the learner's own work or show how authentic assessment decisions were made.
- This becomes a problem during IQA/EQA sampling, because the centre cannot show whether AI use was appropriate, proportionate, or subject to human oversight.

Reduced Trust

- Staff, Learners/Apprentices, IQAs, EQAs and regulators may lose confidence in assessment decisions if it is unclear where AI has been used.
- A perceived lack of transparency can undermine belief in the fairness of assessment outcomes, even when decisions are sound.

Inconsistent accountability

- Without clear documentation and reporting lines, it becomes difficult to identify:
 - who used AI
 - for what purpose
 - whether their use complied with centre and awarding-organisation policy
- This leads to gaps in responsibility, unresolved issues, and inconsistent decision-making.

Ineffective quality assurance

- When AI use is not visible, IQAs and EQAs are unable to check:
 - whether assessors applied human judgement
 - whether feedback aligns with required criteria
 - whether AI use influenced assessment outcomes
- This limits the effectiveness of internal and external quality assurance processes.

Inability to investigate concerns

- If a learner/apprentice challenges a grade, or if authenticity questions arise, the centre needs a clear record of:
 - what AI assistance was used
 - how it was overseen
 - how decisions were made

Without transparent documentation, investigations take longer, are less reliable, and may lead to incorrect findings.

Centres/Providers must:

- Publish information for staff and Learners/Apprentices on how AI is used in assessment and learning.
- Provide clear guidance on referencing AI-generated content where permitted.
- Communicate monitoring and review processes so staff and learners understand how AI use will be overseen.
- Ensure that AI use by staff remains subject to human oversight and accountability.

Centres/Providers could:

- Centres/providers could have designated staff who on a regular basis ensure that the above points are followed.
- Include AI usage statements in IQA sampling records.
- Nominate an AI lead to oversee compliance.
- Conduct annual refreshers on AI and assessment for staff.
- Provide FAQ resources for learners and staff.

Example (Transparency – Access to HE Learner Declaration Not Recorded)

Scenario

An Access to HE learner uses an AI tool to check grammar and improve clarity in their essay. They verbally tell their tutor they used AI support, but the centre has no process for recording learner/apprentice declarations. When the Moderator later reviews the sample, they query an unusual change in the learner's writing style. The centre cannot evidence whether AI use was permitted, declared, or reviewed.

Risk

Because the centre did not keep a clear record of the learner's AI declaration, the Moderator cannot see how AI was used, whether it complied with centre policy, or whether assessor judgement was applied correctly. This lack of transparency undermines accountability, makes quality assurance more difficult, and may result in the centre receiving actions for insufficient evidence of compliance.

Review Arrangements and Monitoring

Gateway Qualifications will review these principles regularly to ensure they remain effective and relevant as technology develops. Reviews will include:

- Monitoring changes in AI capability and assessment practice, including emerging risks and opportunities.
- Sector trends and best practices to anticipate future developments.

Centres/Providers will be supported through updated resources and communications to help them apply these principles as technology and regulatory expectations evolve.

Regulation

These principles apply to all Gateway Qualifications' qualification offers as regulated by

- **Ofqual**, regulator for qualifications, exams and tests in England, with the exception of Access to HE Diplomas
- **Qualification Wales**, the independent regulator of non-degree qualifications in Wales
- The **Quality Assurance Agency (QAA)**, the regulatory body responsible for the national framework of the Access to HE Diploma in England, Wales, and Northern Ireland

Legal and Regulatory References

Ofqual General Conditions of Recognition

Qualifications Wales Standard Conditions of Recognition

A6 Identifying risks

A7 Management of incidents

A8 Malpractice and maladministration

D7 Making available information to help meet Teachers' needs

G8 Completion of the assessment

G9 Delivering the assessment

H2 Centre Assessment Standards Scrutiny where an assessment is marked by the Centre

H5 Results for a qualification must be based on sufficient evidence

J1.8 Definitions (Assessor)

QAA

Access to HE Licensing Criteria (until 31/07/2026): 51, 95, 96-103, 110

Access to HE Conditions (from 1st August 2026): Condition E3: Academic misconduct (including generative artificial intelligence)

Gateway Qualifications' documents and guidance

- [Quality & Compliance - Gateway Qualifications](#)
- [Centre Guide to Internal Assessment](#)
- [Malpractice and Maladministration Policy and Procedure](#)

Other guidance

- [AI Use in Assessments: Protecting the Integrity of Qualifications - JCQ Joint Council for Qualifications](#)
- [Ofqual's approach to regulating the use of artificial intelligence in the qualifications sector - GOV.UK](#)
- [Using AI in education: support for school and college leaders - GOV.UK](#)

Contact us

If you have any queries about the contents of this document, please contact:

Telephone: 01206 911211
 Email: enquiries@gatewayqualifications.org.uk
 Post: Gateway Qualifications, Gateway House, 6 Tollgate Business Park,
 COLCHESTER, CO3 8AB

Revision History

Revision Date	Version	Updated By	Summary of Changes
July 2026	1.1	Quality Improvement Administrator	Regulatory Expectations (QAA – page 4) wording updated for clarity.
May 2026	1.0	Head of Quality and Standards	New document created.



enquiries@gatewayqualifications.org.uk
www.gatewayqualifications.org.uk

Tel: 01206 911 211

Gateway Qualifications, Gateway House,
3 Tollgate Business Park, COLCHESTER CO3 8AB

Charity Registration No. 1114282.

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