Group Artificial Intelligence Governance Policy

1. Policy statement and application

1.1. The Group Artificial Intelligence Governance Policy applies to all UP Education Limited and UP Education Australia Pty Ltd (together, the "**Group**") employees, contractors, sub-contractors and volunteers, including all individuals working for the Group's various New Zealand and Australian entities ("**Group People**").

1.2. The Group Artificial Intelligence Governance Policy applies to students, and affiliates who engage with AI technologies in academic or administrative contexts. This includes the use of AI in curriculum development, learning design, assessment, teaching delivery, student support services, operational processes, and institutional decision-making.

1.3. This policy establishes the governance framework for the use of Artificial Intelligence (AI), with a particular focus on Generative AI (GenAI), across the UP Education group. Its primary purpose is to guide the ethical, transparent and strategic implementation of AI technologies in a manner that supports educational quality, upholds academic integrity, protects individual privacy, and aligns with the broader institutional mission.

1.4. This policy serves as a group-wide framework that individual divisions must adapt to meet their specific regulatory requirements while maintain alignment with UP Education's core principles.

1.5. This policy will be applied in line with relevant, current legislation including:

- **New Zealand:** New Zealand Qualifications Authority (NZQA) requirements, Education and Training Act 2020, Employment Relations Act 2000, Human Rights Act 1993

- **Australia:** Tertiary Education Quality and Standards Agency (TEQSA) requirements, TEQSA Act 2011, Higher Education Standards Framework, Fair Work Act 2009, Disability Discrimination Act 1992

2. Policy principles

2.1. The application of AI at UP Education is underpinned by a clear set of foundational principles designed to safeguard the integrity of educational outcomes and ensure the institution's leadership in adopting emerging technologies responsibly. Academic Integrity requires that all uses of AI respect the authenticity of student work and uphold the credibility of qualifications awarded by the institution.

2.2. **Transparency**
Ensures that the purposes, limitations and responsibilities associated with AI use are clearly communicated to all stakeholders.

2.3. **Equity and Inclusion**
Guarantees that AI tools are made available in a fair and accessible manner, ensuring that all learners, regardless of background or circumstance, can benefit equally from their application.

2.4. **Privacy and Safety**
AI tools must be implemented in compliance with data protection laws and institutional

protocols, with robust safeguards to prevent misuse, unauthorised access or the exploitation of personal information.

2.5. **Ethical use**
Insists that AI be deployed in ways that support and augment human learning, rather than displace the core pedagogical relationships between teachers and learners.

2.6. **Continuous Improvement**
UP Education systematically reviews the effectiveness of its AI strategy, making iterative adjustments in response to technological advances, regulatory change and stakeholder feedback.

3. Governance structure

3.1. The governance of AI within UP Education operates through a layered structure that incorporates both corporate oversight and academic leadership. At the strategic level, the Executive Leadership Team is responsible for articulating the overall direction of AI implementation across the organisation and ensuring that institutional priorities and values are reflected in AI adoption.

3.2. The Group Risk and Compliance Committee plays a critical role in identifying, managing and reporting risks associated with the deployment of AI technologies, particularly where these relate to legal obligations, regulatory compliance or reputational harm.

3.3. In the academic domain, the divisional Academic Boards are the primary bodies overseeing the use of AI in teaching, learning, research and student assessment. These boards hold ultimate accountability for academic quality and ensures that AI is integrated in a manner consistent with academic standards.

3.4. The Teaching and Learning Committees within each brand or business unit are responsible for designing, trialling and embedding AI within educational practice, while maintaining a continuous feedback loop with the Academic Board.

3.5. Course Advisory Panels provide expert input into how AI can support curriculum relevance and graduate employability, drawing on current industry practices.

3.6. The Academic Integrity Officers, working across campuses, are responsible for investigating and responding to breaches of academic conduct involving AI and for maintaining up-to-date records and reports on integrity matters.

4. Acceptable use of AI

4.1. AI may be used across UP Education to enhance the learning experience, increase operational efficiency, and support pedagogical innovation, provided that such use is transparent, ethical and appropriate to context. Within teaching and learning, AI can be used to support inclusive instruction and differentiated learning strategies. For example, generative AI tools may be used to personalise content delivery, offer real-time feedback to learners, and generate learning prompts or revision activities. Educators may also utilise AI to support lesson planning, engagement strategies, and moderation activities where human oversight remains the primary mode of delivery and judgment.

4.2. In the area of student assessment, AI may be used to assist students in developing ideas, exploring alternatives, or preparing drafts, but this use must be explicitly disclosed, and the final work submitted must demonstrate original understanding and meet the assessment criteria.

4.3. GenAI tools must never be used by staff or students for summative grading, competency decisions or high-stakes evaluations without human review. In operational settings, AI may be applied to automate administrative workflows, streamline customer service interactions, and enhance learning management systems, provided such systems remain auditable and aligned with institutional standards.

5. Prohibited use of AI

5.1. UP Education prohibits the use of AI in any manner that undermines the credibility of student learning or institutional assessment. Specifically, the use of AI to fraudulently complete academic tasks, to generate or submit work under false pretences, or to impersonate students in any way is not permitted.

5.2. Students are not allowed to present AI-generated outputs as their own original work without full acknowledgement and citation. Similarly, the use of AI to assist in contract cheating, unauthorised collaboration, or to fabricate evidence in support of assessment requirements constitutes a serious breach of academic integrity.

5.3. Moreover, no AI system may be used to make or influence high-stakes academic or operational decisions—such as student progression or certification—without clear human oversight.

5.4. Finally, the training of AI systems using institutional or personal data without explicit and informed consent is strictly prohibited.

6. Academic integrity and misconduct

6.1. Any breach of academic integrity involving AI will be managed in accordance with the institution's established misconduct procedures.

6.2. Academic integrity includes but is not limited to maintaining the authenticity of student work, providing proper attribution for all sources—including AI-generated content—and avoiding deceptive or dishonest practices. A breach may occur when a student uses generative AI to complete assessments without acknowledgement, collaborates inappropriately with others using AI tools, or submits work that does not reflect their own learning.

6.3. When a suspected breach occurs, the matter will be referred to an Academic Integrity Officer for investigation. The student will be given the opportunity to respond to the allegation and may provide evidence in support of their position. If misconduct is confirmed, outcomes may range from educational interventions, such as additional training and resubmission of work, to more serious consequences, including failure of the assessment task, re-enrolment in the unit, or further disciplinary proceedings. All outcomes will be recorded in the student management system, and repeat breaches may result in escalation.

7. Training and capacity building

7.1. UP Education will ensure that both staff and students are supported to engage with AI technologies competently and ethically. All academic staff will complete training in AI literacy, with a focus on responsible integration, assessment design, and mitigation of algorithmic bias. A suite of professional development resources, including AI use guides and exemplar case studies, will be made available and updated regularly to reflect sector best practices.

7.2. Students will be introduced to the appropriate use of AI during orientation, through a mandatory AI awareness module delivered via the institution's learning management system. This module will cover core topics including AI capabilities and limitations, ethical guidelines, referencing protocols, and the risks associated with misuse. Student understanding of these principles will be reinforced through formative activities and ongoing support by teaching staff.

8. Privacy, security and date ethics

8.1. All uses of AI within UP Education must comply with applicable data protection legislation, including the Privacy Act 1988, Privacy Act 2020 (New Zealand), the Australian Privacy Principles and the New Zealand Privacy Principles. Before any AI system is implemented, a privacy impact assessment will be conducted to ensure that data collection, storage and processing meet institutional security standards. AI tools must not collect, share or retain personally identifiable information without the explicit consent of the data subject. Students and staff must be advised not to input sensitive data into third-party platforms, including health, financial, or confidential personal information.

8.2. AI solutions deployed at scale must be evaluated for their security credentials, vendor practices, and ethical safeguards, with preference given to systems that do not use institutional data for model training or commercial gain.

8.3. Ongoing monitoring will be undertaken to ensure that no AI technology compromises the integrity, safety or confidentiality of institutional operations.

9. Monitoring and evaluation

9.1. The implementation and impact of this policy will be monitored through a central AI metrics dashboard. This dashboard will provide quarterly reports to the Academic Board and the Group Risk and Compliance Committee, capturing data on academic integrity incidents involving AI, feedback from staff and students on AI usage, and any emerging risks or opportunities.

9.2. Performance data will include comparative analysis of student engagement, assessment outcomes, and course completion rates before and after the integration of AI tools. Particular attention will be paid to the distribution of benefits and risks across student equity cohorts, ensuring that AI deployment does not exacerbate existing disadvantage.

9.3. Periodic surveys will be conducted to measure satisfaction and literacy levels among both learners and educators, with results informing policy refinement and staff development priorities.

10. Continuous improvement and policy review

10.1. This policy is a living document and will be reviewed annually, or more frequently where necessary, in response to changes in legislation, emerging technologies, or significant feedback from stakeholders.

10.2. The review process will be led by a cross-functional committee consisting of representatives from technology, academic leadership, compliance, teaching and learning, and student services.

10.3. Policy revisions will be documented, approved by the relevant Academic Board, and disseminated through formal institutional channels.

11. Implementation and accountability

11.1. Responsibility for the implementation of this policy rests with the Divisional CEOs, who will oversee the development of supporting procedures, systems, and guidelines.

11.2. The divisional Academic Boards are accountable for ensuring the integrity and academic rigour of AI applications in teaching and learning. Operational leaders across divisions will ensure that staff are appropriately trained and that compliance is monitored locally. Educators are expected to integrate AI in a manner that reflects both educational best practice and institutional values. Students are accountable for using AI tools ethically, honestly, and in accordance with the principles set out in this policy.

11.3. Through this policy, UP Education reaffirms its commitment to providing a high-quality, future-ready education in which emerging technologies are leveraged to empower students, enhance teaching, and safeguard the integrity of its qualifications.

Policy Owner	UP Group Chief Technology Officer
Approved By	UP Group Chief Executive
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*Unless otherwise indicated, this procedure will apply beyond the date of next review.