

POLICY C35.0

ACCEPTABLE USE OF APPLICATIONS THAT UTILISE GENERATIVE AI.

1.0 INTRODUCTION

1.1 Context

In the provision of their business, including higher education, vocational education and bespoke courses for industry, Scentia and its subsidiaries, the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), recognise the increasing usage and benefits of Generative AI based technologies to support its teaching and learning, administrative and business activities.

Generative AI models and systems such as OpenAI ChatGPT and Google Bard have seen a surge in their adoption across businesses, companies are utilising this technology to streamline creative processes, generate personalised content, and enhance customer experiences. While Scentia supports adopting new technologies to aid our mission, we also understand the risks and limitations of such technologies.

1.2 Purpose

The purpose of this policy is to govern the responsible use of Generative AI to protect the interests of Scentia, workers, customers, and stakeholders, from the risks associated with the technology. It is a set of rules and guidelines that govern the responsible, ethical, and effective use of artificial intelligence technologies. It outlines acceptable behaviours, practices, and procedures related to developing, implementing, and using Generative AI systems. This policy focuses on ensuring the responsible use of Public and Private applications that use Generative AI.

1.3 Scope

This policy applies to:

- all non-academic and academic workers of Scentia whether full-time or fractional, continuing, fixed-term, contractors or casual;
- members of Scentia, AIM and ACHW Boards;
- volunteers who contribute to Scentia's activities.

This group will be referred to as “workers” throughout this document.

1.4 Scope Exceptions

This policy does not apply to students and customers of Scentia and its subsidiaries.

2.0 RESPONSIBILITIES

1. Workers are responsible for ensuring that they, and their contractors, partners, and customers, use applications that utilise Generative AI in compliance with this Policy and any other relevant policies or procedures.
2. Workers are responsible for the content generated using applications that utilise Generative AI. They must ensure that it aligns with Scentia's values, policies, and guidelines, and does not violate any legal or ethical standards.

3.0 POLICY

3.1 Principles

1. The use of applications that utilise Generative AI will largely be allowed while performing work for Scentia. Use should be limited to business-related purposes and in line with the values of the organisation.
2. The use of applications that utilise Generative AI for business purposes is only permitted if the application will not use the data Scentia feeds into the AI system to train the AI model. A log of approved applications is kept by the Scentia IT team. Workers must ensure new applications are reviewed by and approved by Scentia IT to ensure they adhere to this principle.
3. The use of Generative AI applications presents risks which include uncertainty about who owns the generated content, security/privacy concerns with inputting proprietary company information or sensitive information and accuracy of the content created which might be outdated, misleading or, fabricated. Scentia establishes a range of internal controls to manage the risks of misuse of Generative AI.
4. Workers using applications that utilise Generative AI must adhere to all applicable laws, regulations, and industry standards governing data protection, intellectual property rights, privacy, and ethical considerations, including Scentia policies and procedures.
5. Workers must protect their login credentials and ensure that their accounts on applications that utilise Generative AI are not accessible to unauthorised individuals.
6. All assets created using applications that utilise Generative AI must be professional and respectful. Workers must use AI chatbots in accordance with all Scentia's code of conduct and antidiscrimination policies. These technologies must not be used to create content that is inappropriate, discriminatory, or otherwise harmful to others or the company.

-
7. Workers should be mindful of potential biases that may arise from Generative AI applications. They must take steps to mitigate such biases and ensure that the generated content promotes fairness, inclusivity, and diversity.
 8. Workers may not share any confidential or sensitive information with applications that utilise Generative AI, including entering such information into Generative AI chatbots. Such information includes, but is not limited to:
 - commercially sensitive data and intellectual properties;
 - personally identifiable information such as names, emails, home address, TFN (Tax file number), passport number and driver's license number;
 - personal health and medical information;
 - passwords and login credentials; and
 - customer data.
 9. Scentia's Acceptable Use of ICT Facilities for Staff Policy applies when using applications that utilise Generative AI with company equipment.
 10. Non-compliance with this Policy and the Acceptable Use of ICT Facilities Policy and Procedure will be managed in accordance with the Discipline and Termination of Employment Policy and Procedure.
 11. All generated content must be properly cited, as must the use of AI generated content when used as a resource for company work, except for general correspondence such as email. All AI-generated content must be reviewed for accuracy before relying on it for work purposes. If a reliable source cannot be found to verify generated information, that information cannot be used for work purposes. Generative AI applications may produce content that is plagiarised from its knowledge base, including copyrighted works, no text generated or partially generated will be eligible to have a Scentia (or subsidiary company) copyright, trademark, or patent at this time.
 12. Workers must:
 - a. ensure that there is always human involvement when setting up applications that utilise Generative AI, and for the receipt and analysis of data and outputs generated.
 - b. not use Generative AI applications to spread false information, engage in deceptive practices, or create misleading content that may harm individuals, groups, or organisations.
 - c. be vigilant and maintain the confidentiality, integrity, and availability of applications that utilise Generative AI. Any vulnerabilities or suspected security incidents must be reported immediately to the IT Manager.

-
13. Workers who are using applications that utilise Generative AI for content that will be used for social media and blogs must comply with the Scentia Social Media policy.

4.0 DEFINITIONS

- **A Generative AI chatbot** is a type of conversational AI system that uses deep learning and natural language processing (NLP) techniques to generate human-like text responses in real-time. These chatbots can hold text-based conversations with users, understand user input, and generate contextually relevant responses.
- **Generative AI model:** The algorithm used to interpret, assess, and respond to data sets based on the training it has received.
- **Generative AI system:** The infrastructure that uses the AI model to produce output based on interpretations and decisions made by the algorithm.
- **Public AI:** An AI system that a vendor makes available to any user who wants access and that collects and uses their inputs to improve the algorithm's performance. Unlike private AI systems, public systems send data outside the organization.
- **Private AI:** A proprietary AI system developed and used by the organization, keeping data within the company or one that explicitly does not collect and use user inputs to improve the algorithm's performance.
- **Workers** - employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees and outworkers.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- Generative AI for Organizational Use: Internal Policy Checklist - Future of Privacy Forum (FPF)
- Acceptable Use of ICT Facilities for Staff Policy and Procedure
- Copyright and Intellectual Property Policy
- Information Cyber Security Policy
- Information Management Policy and Procedure
- Privacy of Staff Information and Records Policy
- Discipline and Termination of Employment Policy and Procedure
- Scentia Social Media Policy
- Staff Code of Conduct

6.0 POLICY OWNERSHIP

Policy Owner	Chief Technology Officer
Status	New Policy
Approval Authority	Scentia Corporate Board
Date of Approval	27 August 2024
Effective Date	6 September 2024
Implementation Owner	IT Manager
Maintenance Owner	IT Manager
Review Due	September 2027
Content Enquiries	<p>Steven Smith - CTO Email: ssmith@scentia.com.au</p> <p>Mike Kumar - IT Manager Email: mkumar@scentia.com.au</p>

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
35.0			New Policy