



AELP Submission: #114

**AELP's response to DfE's Call for
Evidence relating to generative AI
in education**

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Introduction

The Association of Employment and Learning Providers (AELP) is responding to the Department for Education's Call for Evidence relating to the use of generative AI in education. This is an emerging area of knowledge, technology, and skills which AELP is taking a keen interest in understanding the potential impacts and benefits for our members and their learners. AELP has in partnership with Ufi VocTech Trust has considered AI within recent research as well as having keynote speeches and workshops on AI at our National Conference.

1. Have you or your institution used generative AI in an educational setting? If so, could you briefly describe the ways it was used, and the specific tools used.

Whilst AELP haven't directly used generative AI tools in an education setting, we are fully aware that our members are increasingly exploring, how AI tools can support their teaching and delivery to learners. There is also significant discussion regarding the use of AI tools by learners particularly in relation to assessed work and how providers should manage the use.

Examples of how members have used AI within their teaching:

- Using AI to create specific notebooks for learners with code, instructions, data, and reading materials.
- AI-generated individualised learning plans based on learner responses.
- Augmenting the learning process and providing supplementary information.
- Identifying knowledge gaps and providing personalised support.
- Faster feedback and standardised assessment with AI marking tools.
- Using AI to support recruitment and matching of students to programmes and employers.

2. What were the main challenges you faced in using generative AI and how did you address these?

Not applicable for AELP to answer.

3. What was the result of your use of these tools, including any impacts?

Not applicable for AELP to answer.

4. How do you think generative AI could be used to improve education?

AELP believe that generative AI could enable the personalisation of learning plans more efficiently and potentially support tutors make workloads more manageable. For example:

- making marking quicker giving them more time to support learners individually.
- Simulations (particularly enhancement of AR and VR models - Metaverse Learning are looking at this already)
- Content creation (allowing trainers to content on teaching and training rather than making PowerPoints and things)

- Virtual mentors and coaches - not a replacement for a human but could enable enhanced learner support in unsociable or remote settings.

5. What subjects or areas of education do you believe could benefit most from generative AI tools?

AELP held roundtable sessions both on teams and in person during the first half of the year, during this session's members highlighted areas which they believe generative AI be beneficial. Providers suggest that generative AI could support tutors to create personalised learning plans for learners. We expect the adoption of AI will take different lengths of time depending on the sector current generative; for example, AI technology may already be helping in things like legal, creative, etc but is likely to take longer to bed in to areas like construction. Within construction and similar sectors AI is likely to become more visible over time in through its use in simulated training experiences.

It has also been highlighted how AI tools can provide learners with virtual mentors in addition to traditional tutor engagement with providers envisaging that this will support flexible learning particularly outside of normal working hours.

AI has been usefully used as support for those where English is a second language as tools like ChatGPT are able to sense check grammar, sentence structure and conciseness and make suggestions as to how to improve this.

6. What are your main concerns about using generative AI in educational settings?

As the use of generative AI continues to grow there are concerns developing about how its use in the workplace will be balanced with ensuring academic integrity within qualifications and identifying learner's competency effectively. This is particularly pertinent for work-based learning programmes such as skills bootcamps and apprenticeships especially with the launch of MS co-pilot happening in the coming months. When co-pilot is launched it is going to be difficult to avoid using generative AI whether this is within a workplace or educational setting.

This means that bodies such as the Institute for Apprenticeships and Technical Education (IfATE), Office for Students, Ofqual and Ofsted need to provide a clear steer to the sector how AI can be used and where is it acceptable to use it, in addition to DfE's [published position on AI in education](#) published in March 2023. There also needs to be consideration about how the use of AI is balanced alongside the need for providers to ensure that academic integrity isn't compromised by learners committing malpractice. This is going to be an ongoing issue which providers will have to manage especially with the speed of development which is happening within AI technology. Providers have responded by updating their malpractice policies but additional guidance from regulatory bodies would be appreciated to ensure that providers are on the right lines. However, the impact of AI isn't solely limited to issues of malpractice, the sector starts thinking very quickly about how AI gets used within their existing delivery models, they are in danger of having those models completely undermined. Providers are already considering how educational pedagogy will need to alter to accommodate AI's introduction. This needs to happen urgently as otherwise learners will be unprepared for the realities of the workplace and real life.

AELP is concerned how the potential change to assessment techniques for example, increased use of professional discussions used to combat the use of AI, will affect the sector given the current recruitment crisis which is being experienced. Members have suggested that current assessment methods will need to change. We expect professional discussions will be used more frequently to check the actual understanding of learners in addition to written assessments, providers are likely to

require additional tutors to manage workloads. As budgets are tight and staff in some sectors in short supply this could present a real challenge for the viability of providers in coming years. However, providers can see that there will be benefits at the same time particularly relating to feedback and creating standardised assessments.

7. If at all, have these concerns impacted your use of generative AI? Please explain how.

Not applicable for AELP to respond to.

8. Are there specific subjects or areas of education where you believe generative AI should not be used? Why.

AELP believes that AI will be present in all subjects in time however that the impact and type of use will be different depending on the subject area. For example, from discussions held during AELP's recent sector forums members have suggested that impact on Land based industries sector is likely to be less than the Finance, Legal and Accounting due to the nature of the work they undertake. When considering areas where AI shouldn't be used in education it is important to remember AI doesn't currently, have the ability to question as humans do, this means topics where answers/actions vary depending on circumstances may not be suitable for generative AI's use. A prime example of this would be safeguarding activity where AI should not be relied upon. It is essential to be aware of AI's limitations when using ChatGPT and other language models. They should be employed responsibly and with a clear understanding of their capabilities to avoid potential risks and misinterpretations. Continual research and development aim to address some of these limitations, but complete human-like AI understanding and reasoning remain a challenge for the field.

9. If any, what are your views regarding ethics, data privacy and security when using generative AI in education?

Ensuring that AI is used in an ethical manner needs to be a focus for providers both in how their staff use its functions but also ensuring that learners are taught how to use AI in an ethical way. This is where the formulation of clear guidelines code of practice would be helpful.

A further consideration of AI's use within the education setting relates to intellectual property and who owns the content that AI creates/ contributes too? Particularly if the thoughts and theories within research or work are your own but tutors or learners use AI to help format work. Turnitin for example has been developed to detect AI's use but it can't detect what it helped do to the piece of work.

A final concern in this area is related to confidentiality and the implications of using AI with confidential information. How is information given to a generative AI application stored and used by the platform in the future? This again requires users to receive training about when it is and isn't appropriate to use an AI tool.

10. How do you see the role of generative AI in education evolving in the future?

AELP believes the use of generative AI tools in education will become more widespread and frequent. As a result, there is an urgent need to revisit theories of education for example is the regurgitation of facts in exam-based environments really going to help you in the real world to critically examine answers given by AI? The sector needs to accept AI is here and that it will be used.

Practitioners need to be supported to adapt the styles of education we use and embrace AI, rather than just trying to stop it subverting what we do now.

The first step in supporting providers to do this starts with the department providing the sector with the tools to use AI effectively. For instance, supporting research into new pedagogical methods and the creation of guidelines to ensure that generative AI is used in a responsible manner.

11. What support do education staff, pupils, parents or other stakeholders need to be able to benefit from this technology?

For generative AI to be beneficial to education staff, pupils, parents, or other stakeholders there needs to be support in the following areas:

- Reduction of digital poverty and improved availability of high-speed WIFI; at present those without digital devices or who must rely on mobile data will be disadvantaged.
- Support to develop increased expertise within the generative AI area.
- Receive training as to how to use AI responsibly and effectively. This should include training and awareness sessions for parents to support pupils at home.
- Additional funding to enable providers to roll out AI across their educational setting.
- Financial support to add AI related content into the curriculum and to support the additional costs associated with AI in terms of delivery.

12. What activities would you like to see the Department for Education undertaking to support generative AI tools being used safely and effectively in education?

As per the recommendations in the recently published joint AELP and UFI VocTech research report, entitled [“Future-ready vocational education - Harnessing Technology for Success”](#) outlines the need to promote the ethical use of AI in education call on the Department for Education to provide actionable guidelines including specific examples which will enable providers to implement guidelines in their organisations in a consistent manner.

Particularly within work-based education it is vital that providers and awarding organisations receive guidance relating to the use of AI in assessment. particularly in apprenticeships where learners are expected to be learning on the job and so will in many organisations be using AI regularly. AELP would request that DfE instruct the IFATE to provide guidance to the External Quality Assurance organisations regarding End Point Assessment and AI's use within apprenticeships.

Members have highlighted that a funded CPD offer relating to AI would be invaluable as they look to change their ways of working and upskills employees to use the technology. As this is an emerging area, widespread expertise is limited in a lot of organisations. AELP and UFI VocTech are currently working on joint plans for CPD activity in this area and would be happy to work with the department on developing them further over the coming months. Please contact Paul Warner – Director of Strategy and Business Development (pwarner@aelp.org.uk) to discuss opportunities further.

13. Is there anything else you would like to add on the topic of generative AI in education?

Whilst AELP are generally positive about the opportunities about generative AI and its use in the education sector but remain cautious about its widespread use as there are still a lot of unknowns. This is broadly the picture from our members, with some excited about the opportunities but others are apprehensive and are mindful of the unknowns are tempering their use. There is a concern about the sectors ability to keep up with the speed of development to ensure they are training individuals in line with needs of employers.

Within the sector this is a topic that is at the forefront of people's minds and had grabbed their attention. This has been highlighted both at our National Conference where both workshops AELP held were full and we had a lot of discussion and excellent engagement and during our sector forums where discussions have been frequent and varied amongst the different attendees. There's real momentum behind this subject currently which needs to be maintained to ensure learners get the best experience possible from their programmes.

About the Association of Employment and Learning Providers (AELP)

The Association of Employment and Learning Providers (AELP) is a national membership body, proudly representing its many member organisations. AELP members support thousands of businesses and millions of learners in England by delivering a wide range of training, vocational learning, and employability programmes. For further discussion please contact AELP:

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