The Perfect Storm

AI, assessment and a sector under pressure

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Executive summary

Assessment is the mechanism through which higher education demonstrates that learning has taken place and is the basis on which employers, regulators and the public place their confidence in a degree. The arrival of generative AI has placed unprecedented pressure on that mechanism. The questions it raises are no longer about the technology, but about the integrity of qualifications, the parity of student experience, and the conditions under which the sector can continue to assure academic standards.

If a single observation runs through these findings, it is one of variability – in student uptake, in staff confidence and attitudes, in institutional policies, in implementation across schools and modules, and in the treatment of students who use GenAI and those who don't. Variability is not in itself a failure. But where variability translates into inconsistency of experience for students on the same award, it becomes a risk to the conditions under which academic standards can be assured.

The report surfaces five key risks that follow from this:

1. **The validity of assessment design.** Where AI use cannot reliably be verified, what assessment is evidencing becomes harder to answer.

2. **Parity of student experience.** Students on the same award can encounter materially different rules and expectations between sites of delivery, modules and individual tutors. International students, students for whom English is a second language, and neurodivergent students are also disproportionately exposed to wrongful accusations and biased detection.

3. **Breakdown in trust between students and staff.** Students described fears of false accusations, adding deliberate errors to appear human, and reluctance to declare even legitimate GenAI use.

4. **Foundational skills and the meaning of a degree.** Concerns from students about foundational skills not being taught and about achieving qualifications without engaging substantively with their studies speak directly to what a degree stands for.

5. **The conditions under which providers can respond.** The assessment approaches the sector is reaching for can also be among the most resource-intensive available at a time of tightening budgets and rapidly changing tools.

The picture is not of a sector in crisis but a sector adjusting in real time to a fast-changing landscape. A gap exists between what providers have put in place and what students and staff experience day to day. It is in this gap that the risks to academic integrity and standards now most commonly lie. Closing that gap is the work the sector now must do.

A huge amount of work is already being done by the sector in response to the challenges posed by AI and to embrace its potential. These findings demonstrate how difficult sector-wide guidance or a sector-wide approach is to implement.

To support the sector in this, QAA is therefore committing to:

- Establishing an AI in Assessment Community of Practice
- Producing training and resources for QAA members
- Continuing to refresh and embed GenAI into our sector reference points
- Funding AI-related research through our Collaborative Enhancement Projects
- Providing bespoke, tailored support for English providers via our products and services.

Introduction

The arrival of generative artificial intelligence (GenAI) has placed unprecedented pressure on assessment as a means of evidencing learning. Tools capable of producing fluent, plausible, and increasingly sophisticated outputs in seconds are now freely available to every student in UK higher education. The implications for assessment are not marginal. They reach into how learning outcomes are written, how assessment is designed, how academic integrity is understood, how academic conduct is managed, and how trust is maintained between students, staff and institutions. They reach, ultimately, into what a degree stands for.

This is no longer a question about technology, but about the integrity of qualifications, parity of student experience, and the conditions under which the sector can continue to assure academic standards in an environment that is changing faster than higher education providers have previously been able to adapt.

Academic standards are the threshold levels of achievement against which qualifications are awarded. They are defined and protected through common sector reference points, such as the Framework for Higher Education Qualifications (FHEQ), The Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS), Subject Benchmark Statements, the UK Quality Code and the Academic Integrity Charter, and are maintained through the academic regulations and assessment practices of individual providers.

Academic integrity is the wider principle that underwrites all this. It is the expectation that the work submitted by a student is the student's own, produced honestly and in accordance with the conventions of their discipline. Without academic integrity, assessment cannot evidence learning, and standards cannot be assured.

GenAI complicates both. It blurs the boundary between a student's own work and the outputs of a tool, and it does so at a scale and speed that has no precedent in the history of higher education assessment. It raises questions that the sector's existing frameworks were not written to address: what constitutes original work in a context where AI is now deeply embedded; how providers can demonstrate that a graduate has achieved the learning outcomes their qualifications claim; how academic conduct should be defined, identified and managed; and how parity of experience can be maintained for students who use AI, students who don't, students who can afford the most powerful tools, and students who can't.

These are operational questions facing every higher education provider in the UK, and they are questions on which the maintenance of academic standards now depends.

Methodology

We pursued four strands of work:

Analysis of existing research on the subject of GenAI in higher education

Hearing the views of students through a series of online focus groups

Hearing from staff via online roundtable sessions to understand what is happening within providers

Drawing on evidence emerging from QAA external reviews over the past few years to see how institutions were reacting

Findings from all these strands have contributed to the themes covered in this report. Further details of the methodology used are included in the technical details section at the end of the report. Direct quotes from the staff and student sessions are included throughout the report to emphasise key points.

Themes arising from the research

One student described using GenAI to "augment" themselves rather than offload their work.

Student uptake of GenAI is high but not universal

Recent surveys suggest GenAI usage among students is now at a high level. The latest HEPI/Kortext[1] survey reports that 95% of undergraduate students are using GenAI, with 94% using it for work they will be assessed on. This marks a significant shift from the first survey in 2024[2], when 66% reported using GenAI and only 53% used it for assessed work. The students we spoke to recognised this trajectory in their own experience, describing rapid uptake and a clear normalisation of use even over the course of their own studies.

"I didn't know it existed for most of the first year and then by the end it was all you could see in lectures was AI." Student participant

The picture is more complicated than the headline figures suggest, however. Alongside this normalisation, our discussions identified pockets of students who have not engaged with GenAI and in some cases actively don't want to. We also heard from students who had initially adopted GenAI tools to support their work but had subsequently stopped, citing various environmental and ethical concerns, worries about declining cognitive function, or a loss of trust in the outputs they were getting. The phenomenon of students rejecting GenAI or reducing their use of GenAI tools was also identified in research conducted by Jisc[3] last year. Results from a survey of over 6,500 UK university students showed that 30% of respondents were not users of GenAI tools[4]. Therefore, the assumption that student usage is on a linear track toward 100% has been challenged consistently, both by sector data and by our research.

"I think a lot of people that I know got into their degree not wanting to use AI and then just as the degree progresses and as it becomes a lot more time-consuming, people start relying on it more and more, even if a lot of people initially didn't want to." Student participant

"I'm really passionate about sustainability and trying to prevent climate change from getting any worse. So, I stopped using generative AI at that point because I felt that any benefits I was getting from using generative AI did not outweigh the environmental consequences of using it." Student participant

Where students do use GenAI, the uses are varied and often considered. The most common applications, echoing work from Wonkhe[5] earlier this year and findings from the Jisc research, are structuring the format of essays or proofreading written work. We also heard about more subject-specific uses, including troubleshooting code, learning unfamiliar programming languages quickly, building revision plans, generating self-test quizzes, and making academic writing and assessment criteria more accessible. One student described using GenAI to "augment" themselves rather than offload their work.

Patterns of uptake also vary noticeably between subject areas. Participants in the arts and humanities were generally, though not universally, more cautious of, or opposed to, GenAI, often citing concerns about its impact on discursive critical thinking and writing as well as the impact on jobs in their fields. Those studying or teaching in the sciences and management subjects, and particularly in computer science, tended to be more enthusiastic and confident in identifying opportunities. Our groups were self-selecting, and no participant said they themselves had used GenAI to fully complete an assessment, but several said they knew of peers in their cohorts who had.

"I think that it's very disheartening when you put a lot of time and effort into something and then you message your friends saying, well, how long did it take you to do that? And they say, oh, four minutes." Student participant

The last point gives a sense of where the tensions around uptake actually sit. Some students raised concerns that they felt foundational skills, such as essay-writing and referencing, were no longer being taught sufficiently because students were now expected to use GenAI for them. And while most participants said they used GenAI because they wanted to, we also heard that some students felt they had to use it, both to keep up with workload and to keep up with what peers were doing. A number expressed the view that GenAI had "raised the bar" on what was expected of student work, with implications for how all students, whether they use the tools or not, are judged against that new baseline.

"If AI produces a really good piece of work and that work gets marked 90%, I feel subconsciously lecturers, or whoever it is, will mark everything against that new standard that's been created and work that humans create will not be considered perfect." Student participant

A number expressed the view that GenAI had "raised the bar" on what was expected of student work, with implications for how all students, whether they use the tools or not, are judged against that new baseline.

[1] HEPI and Kortext Student Generative AI survey 2026 – March 2026
[2] HEPI and Kortext Student Generative AI survey 2024 – February 2024
[3] Jisc Student Perceptions of AI 2025 - May 2025
[4] Student Experiences of Generative AI in UK Universities - StudentXGenAI Survey – forthcoming publication, see technical details section for more information
[5] Wonkhe x Kortext Educating the AI generation – April 2026

A further question, and one on which staff participants were genuinely split, is what to do about students who object to using GenAI on environmental, ethical or other principled grounds. Some providers had policies in place that meant GenAI use was permitted or encouraged but never required, preserving an option for students who wished to opt out. Others had introduced policies that required GenAI use, with no alternative route for 'conscientious objectors'. Even among those sympathetic to giving students a choice, a number of participants, both staff and students, questioned how realistic or fair it will be to maintain that position in a world that is increasingly building GenAI use into both higher education and the workplace.

"I'm not sure how long it will last before it becomes that anyone who uses AI has such an academic advantage that you have to use it if you want to do well, which I'm not looking forward to when that time comes, but I think that is on the horizon." Student participant

"For the vast majority of employers, there is a clear expectation the students will leave institutions with these skills. From a responsible point of view, as an institution, we have a clear expectation to make sure they can use AI responsibly, and I think we must teach students how to use AI effectively and responsibly for a whole bunch of reasons, including to help them do their assessments." Staff participant

Students aren't getting the training and support they need to be confident in their AI use

Questions of equity and fairness came up consistently across both staff and student groups, and they cut in more than one direction. Several student groups were identified by participants as facing a steeper learning curve in developing GenAI skills, such as mature students, those entering higher education from less traditional routes such as BTECs or foundation years, and neurodivergent students. But the same groups were identified as among those who stand to benefit most from GenAI tools, with the potential to narrow gaps in understanding academic concepts and unwritten academic "norms" that can otherwise be taken as givens.

"Within our institution, Disability Services have obviously been encouraging students with disability, like dyslexia, to use Grammarly and that's completely appropriate. But within the AI tool of Grammarly, you can also ask [it] to write. So, we've had lots of things like this about students with disability getting quite concerned. Am I allowed to use this? What do I have to say that I've done around this?" Staff participant

International students were a further recurring point of focus. They were widely identified by others as a group well-placed to benefit from GenAI tools, particularly for support with academic writing, but also as a group disproportionately at risk of being accused of academic misconduct, and with more severe consequences if they were charged. A number of staff and student participants felt that detection tools are biased against students for whom English is a second language, flagging higher rates of false positives and amplifying anxiety among students who have not used GenAI at all.

Underlying these specific equity concerns is a broader observation about capability. One computer science student made the point that differing levels of digital literacy, which is the basic competence one has for using digital tools, may be a more significant contributor to the digital divide than differences in access to premium tools.

Lack of training and guidance comes up in multiple quantitative sources: only 24% of participants to the Jisc Student Digital Experience Insights Survey[6] said they'd received training or support on the appropriate and effective use of AI; 49% of respondents to the 2026 HEPI/Kortext survey agreed they had been given support to improve their GenAI literacy skills; 41% of respondents to the StudentXGenAI survey agreed they were given enough guidance to use GenAI effectively in their studies, and only 23% agreed they were given enough guidance to use it effectively in their future careers.

What we heard most consistently from students was that they want better training in how to use GenAI tools responsibly. They want that training to include consideration of the environmental and ethical issues associated with GenAI, so that they can make informed choices on whether or not to use it, can use it well if they choose to, and can develop the skills that they believe employers will expect of them when they go on into the workplace. This was echoed in the staff groups, with acknowledgement that too often up to now, the focus has been on just telling the students what they can and can't do without enough focus on how to use these tools.

"If you just put a ban on something, people will find a way around it. But if you teach people how to use it and teach them to understand, for example, the sustainable impacts, the impacts on cognitive function, if they can understand how to use AI in a way that is good and fair, then that is likely to be more successful than trying to police it." Student participant

"I think our biggest responsibility as educators is to facilitate students to learn how to use the tools effectively and critically." Staff participant

[6] Jisc Student digital experience insights survey 2024/25 – September 2025

Assessment redesign is underway, but resource constraints limit how far it can go

An increasing proportion of students have reported that the way they are assessed has changed in response to GenAI (32% in the 2024 HEPI/Kortext survey, rising to 65% in 2026), a finding which is corroborated by our research. AI has featured in a rapidly growing proportion of external QAA reviews, rising from around one in ten in 2023, to more than half in 2025. The review evidence captures a clear movement over that period from a reactive focus on misconduct toward the structural redesign of assessment.

Authentic assessment is the most frequently invoked response, appearing in named institutional projects, in features of good practice, in committee discussion and in staff development as an organising principle. Alongside authentic assessment, external QAA reviews describe a recurring cluster of approaches: oral and viva components introduced explicitly in response to GenAI; the submission of drafts and the demonstration of process; the practical demonstration of knowledge where written work is vulnerable; and assessment requiring students to use and then critically evaluate AI output. A near-routine operational feature in providers that have engaged with AI is the assessment declaration or coversheet, often accompanied by an assignment-level specification of permitted use. Two-lane and secure-versus-non-secure models also appear, though more often as institutional intention articulated in the shape of policy or guidance than as evidenced embedded practice. We have also seen assessment concerns surface through external examining, including observations that traditional essay assessment may need to change.

Our staff and student groups also mentioned all these adaptations. Staff raised concerns about approaches which rely on continuous assessment, both because of the additional anxiety such designs can create for students and because of the risk of a surveillance culture developing around them. Students themselves echoed this in places, describing process-based assessment as sometimes feeling like a check on whether they had cheated rather than as a demonstration of learning.

"The challenge is when you do the assessment of the process, students can often feel overwhelmed and they're constantly being assessed. And I think that what we're trying to juggle now is how do we get that balance where we are recording that, but students are not feeling they're constantly being assessed in almost every class." Staff participant

What emerged most strongly from the staff groups, however, were the resource and workload implications of this direction of travel. Many of the assessment approaches the sector is turning to in response to GenAI, such as assessment of process, more frequent assessment touchpoints, authentic assessment, oral and presentation-based components, vivas etc., all share a common feature: they require significantly more staff time to design, deliver and mark. Marking a process portfolio takes longer than marking a final essay; facilitating vivas for an entire cohort generally takes longer than reading their submissions; authentic assessment requires more individualised design and feedback than standardised tasks.

The resource and workload implications are not incidental to the move toward AI-resilient assessment. They are structural, with staff participants repeatedly raising questions as to how workload implications act as a constraint on how far and how fast their providers can move to address these issues. Practical concerns add to this picture: finding rooms that can accommodate large cohorts for in-person exams, building the time into staff workloads to viva large numbers of students, and embedding feedback on process documents as well as final outputs. Finally, we heard concerns that some of the approaches to assessment design in response to GenAI may have issues with accessibility and inclusion, such as verbal assessment approaches, surfacing inherent tensions in ensuring assessment redesign is both secure and inclusive.

"There was a kind of ripple of fear within the assessing community that we would be faced by this other kind of 70-page evidence that we're already a bit pressed for time and how we would do that" Staff participant

"I think my main concern is the speed of change accompanied with workload of the people who are trying to support these students and the cost of everything in higher education. all combined into one sort of bubble of what feels like a bit of a perfect storm." Staff participant

A further dimension is the level at which these adaptations are happening. Many are being made at the modular level or by individual staff, and the cumulative effect can be that students experience materially different rules, expectations and permitted uses of GenAI tools across a single programme of study. While some variation is legitimate, what students and staff described to us is something different: unstructured, individual-level variation within a single programme, where students cannot predict from one assessment to the next what is acceptable. This is the point at which well-intentioned individual adaptations begin to feed into the larger consistency problem this research has discovered. Without a coherent institutional framework holding them together, even good local responses can contribute to the gap between policy and practice that students experience day to day.

"What might be allowed on one course would not be acceptable on another? [Students] are getting mixed messages from the academic community. And when you've got provision that is delivered across multiple schools with different expectations, it's really difficult for students to keep up." Staff participant

Detection is losing credibility, and the language of policing is eroding trust

Provider approaches to GenAI use in assessment have shifted towards a permissive but often cautious position – one in which use is allowed in some forms, and prohibited in others, but where permission does not necessarily equal encouragement. The 2026 HEPI survey found that 36% of students agreed with the statement that they are encouraged by their institution to use GenAI while 36% disagreed – figures that capture the ambiguous middle ground in which many students now find themselves: not banned from using GenAI, but not actively supported in doing so either. This ambiguity exposes the lack of clarity many students are now faced with when it comes to the responsible and ethical use of GenAI in assessment.

Provider approaches to GenAI use in assessment have shifted towards a permissive but often cautious position – one in which use is allowed in some forms, and prohibited in others, but where permission does not necessarily equal encouragement.

Students want clarity. They want to know what tools they are allowed to use and when, and what will be overstepping into academic misconduct. Alongside the appetite for clearer permission and better training, students also want to see effective deterrents in place to stop those that do overstep from "getting away with it". This sits somewhat in tension with what appears to be the overall direction of the sector, which is away from detection and policing towards education and assessment redesign. However, this is a genuine and frequently expressed student concern – so, resolving that tension is something the sector will need to address.

Discussions of GenAI "misuse" and what constitutes academic misconduct brought out a range of challenges for the sector. A number of the students we spoke to expressed frustration that peers were using GenAI in ways their providers prohibited, but that the difficulty of proving such misuse meant they were rarely caught or sanctioned. Staff echoed this in places: that students need to be able to see that the rules put in place are enforceable in practice if those rules are to retain credibility.

Alongside this, we heard about the anxiety students felt about being wrongly accused of academic misconduct, even when they had not used GenAI at all. Some participants described knowing people who would deliberately add mistakes to their work so that it appeared more human.

"Honestly, AI makes assessment feel unfair, particularly if some students use it to enhance or generate work while others rely entirely on their own effort." Student participant

"We've had some students saying, I want to report that Joe Bloggs is using AI when they shouldn't do and things like that. So, I think there's a profound feeling of being cheated if colleagues are getting away with it in the student body. So again, I think that there needs to be a very positive and very public approach to use of AI, but it needs to be seen to be upheld." Staff participant

It is most commonly in terms of the discussion of this point that AI features in external QAA review reports, and almost every provider that has revised its position on AI has also revised its academic conduct procedure. We have seen the definition of misconduct widen to include inappropriate AI use, integrity policies updated to treat AI as a source, and conduct procedures restructured in response to changing case patterns, including a noted rise in cases involving GenAI.

Themes arising from the research

One provider's revised academic misconduct procedure now defines misconduct to include the inappropriate use of GenAI tools alongside traditional categories such as plagiarism and falsification of data; another has updated its style guide and academic integrity policy to include guidance on the use of GenAI as a source; a third has responded to rising numbers of misconduct cases involving GenAI by establishing an academic integrity oversight committee and appointing dedicated integrity offices in each school.

These developments illustrate the range of structural responses which external QAA review processes have identified.

On detection itself, external QAA review evidence shows a sector taking markedly different decisions, with some providers investing in detection tools as one element of a wider framework, and others explicitly declining to use them and relying instead on assessment design and close knowledge of their students. This divergence sits against a growing research base that has raised repeated concerns about the reliability of GenAI detection tools. A 2024 study by the University of Reading[7] submitted ChatGPT-generated answers across five undergraduate modules and found that 94% went undetected, and that on average those submissions scored half a grade higher than real student work. Analysis from the University of Manchester[8] has argued that reliance on detection is misaligned with the current educational landscape, and institutional testing elsewhere has reported high rates of false positives, with particular concerns about bias against international students, students for whom English is a second language, and neurodivergent students.

External QAA review judgements have generally accepted these differing approaches where they are coherent with wider integrity and assessment frameworks, rather than pressing providers towards a single approach. Where they have made recommendations, they have tended to concern procedural clarity and transparency rather than detection as such. The Academic Integrity Charter is also cited directly as informing institutional procedure, evidence that QAA's frameworks continue to shape practice in this area.

Our staff roundtables reflected this same diversity directly. Some participants focused on the need for detection, employing a range of techniques with varying levels of success and using assessment design to limit GenAI use. Others felt the "genie was out of the bottle" and that effective detection was a lost cause, with detection capability consistently lagging behind the tools it is intended to identify. These participants wanted to focus instead on what each assessment is meant to assess, with design oriented around enabling students to demonstrate learning. The resource demands of pursuing cases were also raised as a factor in this shift away from detection-led approaches, particularly where vivas or other verification steps are required as part of the process.

"The students who are cheating themselves out of the effort and the learning [need to be made] aware that that's what they're doing. They're not gaming a system. They're actually destroying their experience." Staff participant

The language of detection, misuse and prohibition was seen by some as setting students up to be fearful before they have even started, framing assessment as something to be policed rather than something to be learned through.

"It feels important to think in terms of not so much proving that a student has done something wrong as satisfying ourselves that they're engaging actively with the learning, that they're understanding the material, that they're meeting the learning outcomes, and that we're having an open dialogue about how they're getting there rather than necessarily calling out, pointing at things that individuals may or may not have done wrong." Staff participant

"I think [detecting GenAI related misconduct] can just about still be done, but it is [an] enormously time-consuming and resource-intensive process to consider all of that evidence and to come to that decision." Staff participant

A connected concern raised by staff was around terminology. The language of detection, misuse and prohibition was seen by some as setting students up to be fearful before they have even started, framing assessment as something to be policed rather than something to be learned through. This matters because of what students themselves told us about the experience of being on the receiving end of that framing: an anxiety around possible accusations, feeling discouraged from putting effort into outputs that GenAI use often makes redundant, and a reluctance to declare even legitimate GenAI use for fear of how it would be received. The cumulative effect is an erosion of the trust on which assessment ultimately depends.

"It's the terminology that we use that doesn't sit well with me. It's detect evidence, it's policing, it's blame, it's fear, it's proof, it's advocacy. It's very police and criminal chat, which is, I've got a law background and it's all, I feel like we're blaming students before they've even got, you know, it's like jumping on you. And that is going to cause so much fear of 'I've done something wrong before I've even submitted an assessment." Staff participant

[7] University of Reading, A real-world test of artificial intelligence infiltration of a university examinations system – June 2024

[8] University of Manchester, New Directions for Teaching and Learning, Contra generative AI detection in higher education assessments – September 2024

Staff capability is what determines whether policy translates into practice

A real standout theme running through both the student and staff groups was the variability in both staff confidence in the use of GenAI tools and staff attitudes towards them. While student usage is now recognised as being high (albeit subject to the variations pointed out above), staff usage and attitudes are markedly more diverse. Most participants in our roundtable sessions, though not necessarily in favour of the use of GenAI in higher education, were in agreement that the sector needs to engage more proactively with the challenges GenAI presents. Equally, most acknowledged that there remain significant numbers of staff at their providers who are either 'putting their heads in the sand' when it comes to GenAI or are actively opposed to it.

Staff development on AI is among the more frequently occurring features in external QAA review reports. Almost every provider which addresses AI also describes related training, and external QAA reviews routinely confirm it is taking place. It appears across a wide spectrum, from substantive pedagogic development delivered through centres for learning and teaching, to AI's inclusion in mandatory training, induction and appraisal cycles. Where staff development has been substantive and evenly distributed, we have tended to identify good practice; where it has been uneven, or where capability and confidence vary markedly between individuals, it has more often featured in recommendations as an area for ongoing development. External QAA reviews clearly identify the variability that our roundtables and focus groups describe: inconsistent staff awareness of institutional guidance across schools, and the variability reported by students in the support available for using AI across faculties, departments and disciplines.

Our roundtables told a similar story about the variability of approaches to staff training. Many participants described initiatives put in place to address the disparity in staff capabilities, but several also expressed frustration that such training is not always well attended. The pace at which the tools themselves are changing was a further concern: training risks being out of date by the time staff are able to engage with it. And in the current climate of tightening budgets and expanding workloads, there is widespread acknowledgement that the resource and capacity simply isn't there for staff to engage with GenAI to the extent that is needed.

"We also have to recognise that many staff don't have the AI skills yet, and in some cases the students are ahead of us in that respect." Staff participant

"My experience is that only the keen beans come to our in-person sessions, leaving a large audience of 'I've had no training." Staff participant

Where staff development has been substantive and evenly distributed, we have tended to identify good practice; where it has been uneven, or where capability and confidence vary markedly between individuals, it has more often featured in recommendations as an area for ongoing development.

This variability matters because confidence in using GenAI and willingness to incorporate it into assessment design tend to go hand in hand. Building staff literacy in this area is, as a number of participants observed, essential to effectively operationalising institutional policies, and without it, the gap between policy and practice that students experience day to day will be difficult to close. Much as some institutions have introduced optionality for students who do not wish to use GenAI on ethical or environmental grounds, institutions may need to consider how they support staff who are similarly minded not to incorporate it into their assessments. Whether that is a defensible position to hold in the longer term, for staff or for students, is part of a wider question this report raises about how realistic principled 'opt-out' becomes in a sector increasingly built around GenAI use.

"I would argue a bit that it's not pro or anti. I would argue that it's training. It's that some staff know how to use it and some staff don't. So, the ones that know how to use it and how to teach it and are interested in it critically and not necessarily pro, but… the others who don't know that much are either throwing out phrases like just put it into ChatGPT, which is really not on, or they're not using it at all." Staff participant

Themes arising from the research

Training emerged as the single biggest ask, both for staff themselves and as a wider acknowledgment that more is needed to address the issues of variability in confidence and capability that are highlighted by this report. Participants connected this directly to what they had been describing about variability in staff attitudes and confidence: training needs to build both the literacy to engage with GenAI critically, such as understanding what it is and isn't capable of, as well as the ethical and practical considerations it raises, and the competency to incorporate it effectively into teaching and assessment. These factors, they observed, tend to go hand in hand with confidence, and confidence in turn shapes what staff are willing to do at the level of assessment design.

"How ready staff are to adopt AI within assessments very much correlates with how confident they feel with AI themselves." Staff participant

Inconsistent practice is undermining AI policy across the sector

Perhaps surprisingly, not all providers we engaged with already have a policy or guidance document in place on the use of GenAI in assessments. Many told us they were currently developing their position, often in co-creation with students, which was an approach welcomed by both the staff and student groups. Some providers have deliberately taken their time, acknowledging that the pace at which the technology is developing makes it difficult to settle a fixed position. One staff participant described their provider as having moved quickly to put a policy in place, initially being seen as a trailblazer, only now to feel left behind by responses to more recent developments elsewhere. The ability of guidance to keep pace with the technology was a concern raised consistently across both staff and student groups. Many noted that their policies are subject to annual review to try to manage this, but the speed of internal approval in providers could frustrate these attempts at agility.

"There's that challenge of things just moving so quickly, but even when you try and be proactive, you're still having to be reactive in a sense because things are just moving so quickly." Staff participant

We heard from a number of providers that they had initially put in place an "emergency response" aimed at "securing" assessments against GenAI use, and that they were now in the process of more holistic curriculum redesign to work out how most effectively to incorporate GenAI going forward.

The dominant institutional pattern external QAA reviews capture is similar: a rapid development of policy and guidance, usually beginning with academic integrity and broadening into assessment, alongside a deliberate shift over the period from prescriptive rules towards principles-based guidance, reflecting a recognition that detailed rules date quickly as the technology advances. AI is increasingly visible in governance too, with explicit references appearing in committee terms of reference and oversight roles, and increasingly featuring as a consideration in programme approval processes. External QAA reviews also show the lag involved, with working groups in some cases only recently convened or frameworks developed but not yet disseminated to schools at the point of review.

Where AI is concerned, students experience the unevenness of implementation before they experience the policy itself...

The student experience of the application of these policies is where the picture becomes most uneven. Our analysis of existing research highlighted inconsistency in this area: although the HEPI/Kortext survey showed an increase over time of students agreeing that their provider has a clear policy on GenAI use in assessed work (63% in 2024 rising to 81% in 2026), the Jisc report on student perceptions of AI noted student frustration with inconsistent guidance. In our focus groups, we heard from students that even where there was a seemingly clear policy in place, they found it confusing to understand what they are and aren't allowed to do with GenAI tools when it comes to assessment. This is exacerbated when different parts of the same provider operate under different policies, particularly for students on joint degrees, but even where a single overarching framework is in place, or where students study in a single subject area, the conflicting opinions and attitudes of individual staff members described previously mean that students are unclear between one assessment and the next what is acceptable.

There are in effect two tests they may be navigating: what is acceptable according to the rules, and what is acceptable to the person who will mark their work – and these two are not always the same.

"Module leader X, on the same programme at the same level of study is doing a completely different thing from module leader Y. Somebody's getting into trouble for plagiarism or academic misconduct on module Y, not on module X. It's just incredibly confusing for our students." Staff participant

"Individual tutors have so much power in this discourse in making students embrace or hide from AI." Staff participant

This is the single most recurring concern in external QAA review judgements. Where AI is concerned, students experience the unevenness of implementation before they experience the policy itself, and external QAA reviews have repeatedly identified inconsistency across schools, faculties, modules and individual tutors as an area requiring urgent and ongoing development.

The gap external QAA reviews highlight is therefore not an absence of policy but a gap between policy and consistent practice, which corroborates directly what students told us in our focus groups.

It was acknowledged in our staff roundtables that provider-level policies, while providing clarity for students in principle, are difficult to operationalise consistently because of different requirements at subject level and different attitudes from staff. In the absence of a provider-level policy, however, what tends to emerge are multiple, potentially conflicting positions at faculty, department or even module level, which further complicate the picture for students.

"We as an institution have been awaiting the institution's policy, the institution's stance on the use of AI. And in the absence of that, it has felt partially devolved to individual colleagues, both academic and professional services. So, we have all felt a little bit lost in waiting for some sort of absolutes to come out of the sector or from the institution to be very clear about what can and can't be used." Staff participant

External factors also complicate matters. We heard from both staff and students that courses accredited by Professional, Statutory and Regulatory Bodies (PSRBs) can be more restricted in how they are allowed to assess, leading to less innovation in assessment types. Providers delivering courses on behalf of other providers can find themselves having to reconcile multiple approaches to meet the demands of different awarding bodies, which again contributes to confusion for students. A related issue was raised by staff in the context of work-based learning and placements: students going out on placement may find themselves actively encouraged to use AI within the work environment, while at the same time being more restricted in their use of AI back at their provider.

"We have had students going out on placement and being encouraged to use AI within that work environment whilst we might not be permitting its use to the same extent." Staff participant

The issue of environmental sustainability was raised a number of times, particularly within the student groups, who noted the apparent disconnect between their institution's sustainability commitments and the institutional adoption of GenAI.

The sector wants support, not regulation

In our roundtable sessions, staff were asked specifically whether they felt some form of support at the sector level was needed. Most participants wanted it, but there was real variation in what they thought would be most helpful and how practical it would be to deliver. Some saw sector-level guidelines as useful for aligning provider-level guidance to a central reference point, an option particularly appealing to participants working with multiple awarding bodies and limited or non-existent guidance from those bodies. Several participants suggested this could happen through Subject Benchmark Statements, building on QAA's existing work, or as something resembling sector-level benchmarks of expected graduate attributes around AI. Others were more cautious, citing the pace at which the technology is changing and the practical difficulty of sustaining sector-level resources.

One participant was explicit about how any sector-level work should be structured. Sector guidance should be principles-led, putting the onus back on the institution to demonstrate how it reflects those principles in its own practice. That framing aligns with the broader shift the report has highlighted, away from prescriptive rules and towards principles-based approaches as the technology continues to develop.

A number of participants looked to sector bodies, and to QAA specifically, to provide training resources, with one participant noting that staff at their institution were actively waiting for sector-led guidance as a first port of call. A related but distinct ask was for sector bodies to work together, given the scarcity of resource in the sector and the inefficiency of a situation in which every provider is working separately on the same set of problems.

There was no appetite for formal regulation in this area. That is a significant finding in its own right. The sector is asking for support, convening, practice-sharing and principled framing, not rules. The strongest single sector-level ask was for forums and structured sharing of practice, including a request that sector bodies work together rather than each doing similar work separately. Several participants also raised the value of looking beyond the UK to learn from sector responses in, for example, Australia, Canada and the Nordic countries.

Looking forward

The findings set out in this report set a clear agenda for the period ahead. The impact of GenAI on assessment is an issue that touches every part of UK higher education, and addressing this issue will require a cross-sector response. This will mean sector-level support, action at provider level, and the kind of collaboration across the sector that staff and students have consistently asked for. Below, we outline the actions QAA will take forward in response to the issues identified in this report, followed by areas where individual providers should now focus their attention.

What QAA will take forward

An AI in Assessment Community of Practice. We will be establishing an AI in Assessment Community of Practice, bringing together staff working on assessment design, academic integrity and AI policy across UK higher education. The community will offer a sustained, sector-wide forum for sharing emerging practice, surfacing common challenges and developing shared resources, addressing both the request for practice-sharing opportunities and the concern raised by participants that one-off resources tend not to be sustained over time.

Training and resources for QAA members. Training emerged as the single strongest **need** across both staff and student groups. GenAI will be a cross-cutting theme of our 2026-27 membership offer, which will include training resources and guidance for providers, with a focus on supporting both staff literacy and practical competency to incorporate it into teaching and assessment, while protecting academic standards and integrity. We will also continue to support the development of student-facing resources, such as the suite of toolkits developed by QAA's Student Strategic Advisory Committee (summer 2026), which provides accessible, student-developed guidance on academic integrity in a GenAI context.

Refreshing sector reference points. We will continue to update our established sector reference points to reflect the impact of GenAI. The refresh of the **Academic Integrity Charter**, planned for academic year 2026-27, will take account of how academic integrity has evolved in light of GenAI, among other developments, and reflect current practice in the sector. **Subject Benchmark Statements** will continue to be updated to provide discipline-sensitive positioning, with GenAI embedded as a cross-cutting theme as they are revised. We welcome continued engagement from providers, staff, students and sector partners in shaping both refreshes.

Funding collaborative, AI-related research through QAA's Collaborative Enhancement Projects. QAA's Collaborative Enhancement Projects fund sector-led research and practice development for QAA members. GenAI and its impact on assessment will continue to be a priority focus of the scheme, with projects supporting providers to investigate emerging questions collaboratively for the sector's benefit. This responds directly to the repeatedly expressed need for cross-sector collaboration as a means of addressing common problems rather than individual providers working in isolation. Recent QAA funded projects include 'Using AI to accelerate innovation in assessment' led by The London School of Economics and Political Science, 'AI literacy and authentic assessment' led by Oxford International Digital Institute, 'Artificial intelligence in the workplace – impact on learning and assessment' led by University of Brighton, and 'Transnational perspectives on ethical uses of generative artificial intelligence in assessment' led by King's College London.

Bespoke and tailored support for English providers. For providers in England, QAA offers bespoke, tailored support on many of the issues raised in this report. We work directly with institutions to develop policy, strengthen assessment practice, and address academic integrity, with delivery shaped around each provider's context – from hands-on support for individual teams to workshops for academic and professional services, and strategic briefings for executive boards. Providers interested in this support can contact us at UKservices@qaa.ac.uk.

What providers can do

Many providers across the sector have already done substantial work in response to GenAI – developing policy, redesigning assessment, training staff – and we recognise the good work that is being done. The picture continues to evolve rapidly, and providers are working through this challenge in real-time. What our evidence highlights is the existence of a gap between policy and consistent practice, and that closing it is the most pressing issue the sector must now resolve. The following points are areas we suggest providers continue to prioritise where work is already being done, and act on urgently where it is not:

- **Invest in substantive staff and student training.** Training emerged as the single strongest need emphasised by both groups. The training need is not only on how to use GenAI, but on how to use it well, including the ethical, environmental and cognitive considerations that students themselves want to engage with. Where training has been substantive, well-resourced and evenly distributed, external QAA review evidence has consistently identified good practice; where it has been uneven, the gap between policy and consistent practice has widened.
- **Build student voice into policy from the outset.** Co-creation with students in the development of AI policy and guidance was repeatedly identified as a feature of good practice in external QAA reviews, and was strongly endorsed by both staff and student participants. Providers developing or refreshing their AI policies may wish to consider how student voice is built into that process from the outset, rather than added at the end.
- **Address consistency of student experience as a priority.** Consistency of student experience across schools, modules and individual tutors emerged as the single most recurring concern in both external QAA review evidence and our direct engagement. Providers may wish to consider how their policies are operationalised in practice, and how variations between disciplines and modules, some of which are legitimate,
  are communicated to students in ways that don't provoke confusion.
- **Sign up to the Academic Integrity Charter and engage with its 2026-27 refresh.** The Charter is a public commitment to the principles that underpin the integrity of assessment, and signals shared standards across the sector. The evidence in this report suggests Charter signatories find it a useful reference point in developing their own academic integrity procedures, and the forthcoming refresh will make it more directly applicable to a GenAI context.

Technical details

Analysis of existing research

An initial review of existing surveys and research relating to the impact of GenAI on assessment in higher education was used to inform the lines of inquiry for the focus groups and roundtables, recognising and drawing on the research already conducted in this area. In addition to previously published work, we were given access to results from the StudentXGenAI survey, a survey of around 7,000 students at seven institutions across the UK conducted by researchers at Edinburgh Napier University in September to December 2025.

Research included in our analysis:

- HEPI and Kortext Student Generative AI survey 2026 – March 2026
- HEPI and Kortext Student Generative AI survey 2025 – February 2025
- HEPI and Kortext Student Generative AI survey 2024 – February 2024
- Jisc Student Perceptions of AI 2025 - May 2025
- Jisc Student digital experience insights survey 2024/25 – September 2025
- Wonkhe x Kortext Educating the AI generation – April 2026
- Gow, S., Illingworth, S. and Fabian, K. (2026). Student Experiences of Generative AI in UK Universities – StudentXGenAI Survey. Edinburgh Napier University, Department of Learning and Teaching Enhancement and Centre for Higher Education Research. Leverhulme Trust Funded Project.

Student focus groups

We held three online focus groups with students in April 2026. Participants were self-selecting, following an open call across the sector.

Across the groups, 26 students from 18 different providers actively participated. Students at providers in all four UK nations took part (17 from providers in England, four from Northern Ireland, four from Scotland and 1 from Wales). While not aiming to be proportionally representative, the split across categories shows that we heard from a diverse range of voices.

- Level of study: 20 undergraduate students, 6 postgraduate students
- Student status: 19 students with a representative position e.g. sabbatical officer
- Nationality: 21 students from the UK, 5 international students
- Broad subject area: 12 from arts and social sciences, 9 from sciences, 4 from management-related subjects.

Staff roundtables

We held three online roundtable events open to QAA member providers in April and May 2026. Again, participants were self-selecting following a call out to member institutions. Each roundtable was split across three smaller groups in order to give all participants the chance to share their views. In total, there were 74 active participants from 54 different providers. We had representation from all four UK nations: 48 participants from providers in England, three from Northern Ireland, 16 from Scotland and seven from Wales. There were representatives from a range of different provider types: universities, colleges, specialist providers and franchise providers.

In addition to the main roundtable events, we gathered further insight from the sector via a session at QAA's Assessment and Feedback Virtual Roadshow in March. This was open to both members of QAA and non-members. The 13 participants were asked to share how they saw GenAI impacting on assessment at their provider. All participants were from different providers, including two international providers.

Thematic analysis of QAA review reports

To assess how institutions were responding to the emergence of GenAI in assessment, we conducted a thematic analysis of 173 review reports published between 2023 and the present day. The starting point of 2023 was chosen on account of the launch of ChatGPT in November 2022, as reviews conducted in the immediate aftermath were unlikely to capture substantive institutional responses to GenAI. Reports from 2023 onwards offered a more reliable window into how the sector was beginning to engage with the challenge.

A targeted search approach was applied across all reports, with each reviewed for specific references to "artificial intelligence", "GenAI", and "Gen-AI" in order to extract evidence of institutional approaches to the technology.

The 173 reports spanned the full range of QAA's review activity, covering providers across the UK and internationally, and encompassing sixteen distinct review types, including Annual Monitoring for Educational Oversight, International Quality Review, Quality Enhancement Review, Education Oversight Review, Tertiary Quality Enhancement Review, Gateway Quality Review, Enhancement-led Institutional Review, International Programme Accreditation, and several other review types.

Limitations

The focus groups and roundtables conducted for this project involved self-selection of participants. We were careful in our communication plan to promote the opportunity to take part as widely as possible, with coverage across the four UK nations and using the communication channels of key sector bodies (for example the UK Quality Council, mission groups and national bodies) as well as through QAA specific channels. Within both staff and student groups we had participation from each of the nations.

We recognise that those choosing to participate in the groups are likely to be more engaged with the debates around GenAI than the average student or staff member and have taken that into account within our analysis. In the student groups we heard from both users and non-users of GenAI tools. In the staff groups, participants tended to be engaged with the work of addressing the challenges and opportunities presented by GenAI. We did not hear directly from any staff members who said they were actively opposed to the use of GenAI within higher education and so we recognise that this will have influenced our findings.

The methodology we have used, combining qualitative findings from the groups with existing quantitative data and thematic analyses of external QAA institutional review work, allows us to cross reference our findings to avoid highlighting what may be very isolated views.

Glossary of terms

- **Academic Integrity Charter:** A QAA framework setting out the principles underpinning academic integrity in UK higher education. Higher education providers can sign up to the Charter as a public commitment to those principles. A refresh of the Charter is planned for the 2026-27 academic year.
- **Academic integrity:** A commitment, even in the face of adversity, to six fundamental values of honesty, trust, fairness, respect, responsibility and courage. It implies compliance with ethical and professional principles, standards and practices by individuals or institutions in education, research and scholarship. The opposite of academic integrity is unethical practices such as plagiarism, collusion, contract cheating or academic misconduct.
- **Academic standards:** These are the standards that providers set and maintain for the award of their academic credit or qualifications, which may exceed the threshold standards. Individual providers are responsible for defining their own academic standards by setting the pass marks and determining the grading/marking schemes and any criteria for classification of qualifications that differentiate between levels of student achievement above and below the threshold academic standards. Providers use national reference points, such as the UK Quality Code, the threshold standards within the Frameworks for Higher Education Qualifications, and relevant Subject Benchmark Statements, to set their academic standards. Degree-awarding bodies are always responsible for the academic standards of their courses, which may exceed the threshold needed for a qualification. (See also 'threshold academic standard'.)
- **Authentic assessment:** Assessment designed to mirror real-world tasks, processes or professional contexts, rather than relying on traditional written exam or essay formats.
- **Conscientious objector:** In the context of this report, students or staff who decline to use GenAI on principled grounds.
- **FHEQ (Framework for Higher Education Qualifications):** The sector-wide reference point that sets out the levels of qualifications awarded by higher education providers in England, Wales and Northern Ireland.
- **FQHEIS (Framework for Qualifications of Higher Education Institutions in Scotland):** The equivalent framework for Scotland, setting out the levels of qualifications awarded by Scottish higher education providers.
- **Generative AI (GenAI):** AI systems capable of producing text, images, code or other outputs in response to user prompts. Distinct from other forms of AI such as learning analytics, adaptive learning systems and administrative automation.
- **PSRBs (Professional, Statutory and Regulatory Bodies):** Bodies that accredit, recognise or regulate professional qualifications and the higher education courses leading to them.
- **Process-based assessment:** Assessment that evaluates the process by which work was produced i.e., through drafts, version histories, reflective accounts or comparable evidence, rather than the final product alone.
- **Product-based assessment:** Assessment that evaluates the final output a student submits, such as an essay or a report, without reference to how it was produced.
- **Programme-level assessment:** Assessment designed coherently across a programme of study, rather than module-by-module, with the intention of evidencing the learning outcomes of the programme as a whole.
- **Secure and non-secure assessment:** A categorisation of assessment by the conditions under which they are delivered. "Secure" assessment is delivered under controlled conditions, such as invigilated exams, in-class assessment or verbal assessment. "Non-secure" assessment is delivered under conditions that cannot be controlled in the same way, such as essays or coursework produced at home and submitted online.
- **Subject Benchmark Statements:** QAA sector reference points that describe the nature and characteristics of qualifications in particular subject areas, supporting consistency across UK higher education.
- **Two-lane assessment (also referred to as open/closed lane assessment):** A model in which a programme of study deliberately includes two parallel forms of assessment: in the context of GenAI, this refers to one lane in which GenAI use is either permitted or required, and one in which it is restricted or prohibited.
- **UK Quality Code for Higher Education:** A sector wide reference point setting out the expectations all higher education providers should meet in respect of academic standards, quality and the student experience.
- **Viva (viva voce):** A verbal examination in which a student is questioned about their work, often used as part of postgraduate assessment or as a verification step in academic conduct procedures.

Participants

QAA would like to thank and acknowledge the contributions of all participants that took part in our focus groups and roundtables for their candid and considered responses.

The following people consented to be named as participants: Matt Brindley-Sadler, Dr Dom Conroy, Richard Dudley, Dr Samer Gharib, Dr Zoe Handley, Daniel Indi Te, Omayma Jabri El, Airidas Kacenas, Emma Lewis, Sam Mason, Mórrigan McEvoy, Cerys McGrath, Laura Milne, Alan Naky, Babiker Omer, William Pein, Vikki Pinkerton, Professor Samantha Pugh, Naomi Spence, Dr Cornelia Tschichold, Caroline Turnbull, Dr Yanning Yang.

Published – July 2026

Registered charity numbers 1062746 and SC037786

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