

**Imperial College Union
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Steps Toward an ICU AI/LLM Policy**

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Decisions: To consider

Background

1. The use of Artificial Intelligence (AI) and Large Language Models (LLMs) has risen rapidly in recent years. According to a survey by the Higher Education Policy Institute¹, up to 95% of university students in the UK engaged with AI this academic year. Policies regarding AI use therefore impact the education and wellbeing of the vast majority of students at Imperial College.
2. ICU currently has no mentions of AI/LLMs in any of its policies.
3. Existing Imperial College policy consists of the following:
 - a. Generative AI Principles² outlining Imperial College's approach to using AI in line with the Core Values³;
 - b. Generative AI Guidance⁴ and an Introduction to Generative AI⁵ course, which provide advice on how to access existing support services and use AI appropriately, including how to write acknowledgements and fact check;
 - c. Code of Practice 8 – Use of Artificial Intelligence⁶ which provides details on Data Protection requirements relating to the use of AI/LLMs;
 - d. Copyright Guidance for Students⁷ which states: *"While you are encouraged to use [teaching materials] to support your learning, you do not have the right or permission to make these available to others. Therefore, you should not upload teaching materials to websites, online AI tools, cloud-based LLM services (e.g. AI chatbots or code-analysis platforms) or share them on social media."* The university has since developed dAlsy⁸, an internal AI platform which is approved for use of unrestricted data;
 - e. ICT Sustainability Roadmap (2026-2031)⁹ which includes AI as one of four themes and outlines plans for research on AI's environmental impact and mitigations thereof, as well as plans to set up a Professional Services AI working group in 2026;
 - f. Additional recommendations and regulations per Faculty, per Department¹⁰, and in some cases per module or per assignment¹¹;
 - g. An AI Vision¹² which is has been under development with OTs.
4. While no university-wide research has been conducted as of yet, a recent coursework which resulted in a high number of AI-related plagiarism allegations prompted a survey of Year 2 EIE students (available upon request)¹³. 79% of the cohort (seventy students) replied:
 - a. 21% reported that they found AI guidance unclear, and 74% did not realise an AI declaration had been required in the coursework's policy¹¹.
 - b. 68% of respondents reported stress or anxiety [MA2.1], and 80% had concerns about procedural fairness [A(3)]. Students also expressed concern about *"inconsistent expectations and enforcement"* and worries that avoiding AI may disadvantage them in curved grading environments.

5. AI/LLMs have been found to negatively affect the wellbeing of some users¹⁴.
 - a. The World Health Organisation¹⁹ recognises generative AI as a “*public mental health concern*”, with ongoing research into how AI can be used appropriately to avoid harm.
 - b. There have been many reported incidents of AI use worsening psychosis¹⁵ or encouraging harmful behaviours¹⁶, including self-harm¹⁷, and current attempts to make models safer with guardrails can still be unreliable¹⁸.
 - c. In recent years, the prevalence of generative AI usage has contributed to increased AI-based sexual abuse²⁰. This has contributed to fear, shame, anxiety, damage to relationships and careers, and other issues among users.
6. AI/LLM use poses significant risks to the environment, the net effects of which are not conclusively understood^{21,22}.
 - a. AI/LLMs have very high energy consumption requirements for both training and operation^{23,24}.
 - i. Generating an image using an LLM takes at least as much energy as charging your phone, with less efficient models using up to 500 times that amount²⁵.
 - ii. Electricity use from AI data centres globally in 2026 is predicted to exceed that of Canada, the country with the sixth highest electricity demand in the world²².
 - iii. Data centres heavily rely on fossil fuels to meet severely fluctuating instantaneous energy demand²².
 - b. The manufacturing of hardware, as well as energy production and cooling for the operation of data centres, poses high demand for water throughout their life cycle. Cooling alone is estimated to consume approximately 560 billion L per year (1.2-1.9 L/kWh), or about 520 mL per query²⁶.
 - c. Data centres for AI/LLM training and operation place a high demand on critical minerals^{22,27,28}. Mining and purification of these materials, as well as recycling of e-waste, is highly energy intensive and polluting²⁹.
 - d. The number of data centres is projected to increase rapidly to support the increasing demand for AI/LLMs, leading to further demands on undeveloped land. For example, three data centres have already been approved and/or constructed on the Buckinghamshire green belt³⁰.
7. AI/LLM use also raises ethical concerns:
 - a. AI/LLMs are trained on large data sets which are often sourced from illegal and extra-legal means. Many literary and visual artworks have been scraped off the internet without permission or compensation, particularly impacting small-scale artists who do not have the resources to monitor the use of their art or sue multi-billion dollar corporations^{31,32,33}.
 - b. Many models have high risk of hallucinations and have been shown to amplify demographic biases and misinformation, which are only inconsistently mitigated at present³⁴. These inadequacies have real-world consequences, including impacting trust of other media and exacerbating systemic inequalities³⁵.

Council is asked to discuss the following points. This consultation will serve as the starting point for the development of the Union’s policy on AI/LLMs which will be brought back to Council at a later date.

1. How should the Union and the University tackle the environmental concerns surrounding AI/LLM use?
2. How could training be developed to effectively enable students and student leaders to handle the environmental, ethical, wellbeing and privacy concerns associated with AI/LLMs? Who should receive this training? Who should deliver it?

3. How far do you agree with this statement? *“Decisions on governance, policy, or values should never be made by or solely informed by AI/LLMs, especially in academic institutions.”* What would be appropriate measures to ensure that AI/LLMs are used ethically, if at all, in the development of policy at the Union?
4. (How) should ICU and Imperial ensure that it/the University does not engage in practices that devalue the work of artists, authors and academics in the AI-era?
5. What stance would you like to see the Union take on AI/LLM use internally and when lobbying the university?
6. How should the University react to the use of AI by academics when setting coursework/exams and by students when completing coursework/exam preparation?
7. How should the University and Union support students with mental health/abuse concerns associated with AI/LLM use?
8. What are the major knowledge gaps that need filled in order to develop effective ICU policies and/or mitigation plans surrounding AI use and its effects on the student body?
9. Were you aware of the above Imperial policies (in the Background)? What should be prioritised in communications/what is not widely adhered to in the student body? How can the communication of policy be improved for better awareness and adherence?

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