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Generative AI in UK Higher Education: A Narrative Review of Institutional Responses, 2022–2024

NICKI JAMES SHEPHERD
Centre for Research and Innovation, UK Research, Manchester, United Kingdom

Abstract- ***The advent of ChatGPT in November 2022 and the subsequent emergence of a myriad of generative artificial intelligence (GenAI) tools has created unprecedented challenges for governance, pedagogy and ethics in higher education institutions (HEIs) in the UK. This paper outlines the nature of institutional policy and guidance in the UK higher education sector in 2022-2024 to map the landscape and focus on how this policy and guidance supports the needs of disabled learners. A narrative review approach was used, using policies from the institutions, position statements from representative institutions (Russell Group and MillionPlus) and sector guidance from the Quality Assurance Agency (QAA), Jisc, AdvanceHE and the Office for Students, which have all been publicly available. Thematic analysis and categorisation of documents into typologies of responses were performed. Four predominant typologies of responses were found: prohibition, cautious integration, pedagogical reimagining and strategic silence. By mid-2024, cautious integration was the most common voice, emerging ahead of the most radical. In both typologies, there was little policy attention to the implications of GenAI for disabled learners with only just a few policy documents making any mention of disability provision, reasonable adjustments or inclusive design. Disability gap has been identified which is a big gap in the current guidance and institutional practices within the sector. Policy development and more research is needed that places the voices of disabled students at the centre of GenAI policy.***

Keywords: Generative AI, ChatGPT, UK Higher Education, Institutional Policy, Disability, Inclusive Pedagogy, Narrative Review

I. INTRODUCTION

In November 2022, OpenAI, the company responsible for ChatGPT, released the AI tool that has been a game-changer for the education-technology landscape. The tool has been used in public within weeks, and it soon garnered unprecedented attention from institutions globally, leading to a host of questions of academic integrity, assessment validity, and the future of learning (Dwivedi et al., 2023; Lo, 2023). The advent of large language models (LLMs) and the greater overall generative AI (GenAI) potential has posed a governance issue for UK higher education institutions (HEIs), as well as a potential pedagogical opportunity of significant impact. It's been an incredible rate of change and a very disorientating change for many institutions. A series of individual institutions, sector organisations and government bodies were forced to develop GenAI policy stances in the months after the launch of ChatGPT, which was in stark contrast to the culture of deliberation in the higher education policy-making process. There were also a number of quality assurance agencies, including the Quality Assurance Agency (QAA), Jisc, AdvanceHE and Office for Students (OfS), who published guidance documents throughout 2023, and there was variation in institutional response, from prohibitions to enthusiastic incorporation of QA into the curriculum (QAA, 2023; Jisc, 2023). In 2023, the Russell Group released its Principles on the Use of Generative AI in Universities, which was a significant effort to provide sector-wide framing for research-focused universities, but was clearly a principles-based (not prescriptive) document (Russell Group, 2023).

Nevertheless, the response by the UK HE sector to GenAI has been relatively under-researched, particularly with regard to the extent of its coverage of the sector. Previous reviews have tended to look at the global trends in AI policy (Moorhouse et al., 2023; Chan, 2023), assessment-specific concerns and risks to academic integrity (Cotton et al., 2024; Luo, 2024), or pedagogical opportunity in specific disciplinary or institutional contexts, rather than examining the policy landscape of the UK sector as a whole. Moreover, while there has been a growing

number of academic integrity and assessment redesign research and policy studies, the impact of GenAI on disabled learners, inclusive pedagogy, and reasonable adjustments provision has been studied and discussed comparatively less in the literature and in institutional guidance documents (Nartey, 2024).

This paper seeks to fill these gaps by conducting a narrative review of publicly accessible policy documents, institutional guidance and commentary from the sector published in the UK HEI sector in the period from November 2022 to December 2024. Integrate into the preceding or following sentence: 'The review draws on three complementary theoretical frameworks. To explore how and at what rate institutions have embraced, adapted or challenged the incorporation of GenAI technologies into their governance processes, we should first look through the lens of Rogers's (2003) diffusion of innovations (DOI) theory. Second, Ball et al.'s (2012) policy enactment theory highlights how sectoral policies are read, inflected and enacted in the institutional settings, where policies are not the same thing as they are in the policy text but are creatively adapted to local contexts, with their meanings being shaped by the local culture, priorities, and constraints. Third, Bacchi (2009) argues that the concept of the disability gap that was applied in the findings of this review is not only informative but also analytical, by directing the attention to a gap, a gap that is not expressed in policy documents.

This review deliberately has a limited scope. International comparisons, although instructive, are not included as only UK HEIs are included. All documents are considered if they are publicly available, no internal guidance that is not published on the institutional websites is considered. The time period 2022–2024 is the time window of the initial institutional response and early consolidation. It is recognised that the sector is a rapidly changing landscape and this review is now a part of an on-going policy dialogue which remains to be completed.

The review is guided by three research questions:

- What changes at policy and guidance level have been seen in the UK higher education sector in the last two years (2022-2024) regarding generative AI?
- What are the key response typologies that can be found throughout the sector?
- How the implications for disabled learners and inclusive practice are covered in institutional responses to GenAI?

II. METHOD

A. Review Design

A narrative review approach has been used in this paper. Narrative reviews are especially suited to the task of describing and synthesizing a field, as opposed to searching a large academic literature in a strictly replicable fashion, (Grant and Booth, 2009) in their influential typology of 14 review types. Unlike a systematic review, a narrative review is not limited by the use of a set of search strings, explicit inclusion and exclusion criteria of material to be included in the selected databases or reporting protocols following the PRISMA guidelines but relies on the expertise and informed judgement of the reviewer to identify, select and synthesize the material of interest (Grant & Booth, 2009). The present paper's aim of mapping is well suited for this approach, as it aims not to test an empirical hypothesis but rather to characterise the landscape of institutional response to GenAI.

It is important to state that this is a narrative review and not a systematic review. There are significant methodological challenges to conducting a systematic review of UK HEI policy documents, in that they are not indexed in academic databases, the organisation and accessibility of institutional websites is vastly different, and many institutions have had multiple changes to their AI policy over the course of the review. The narrative approach allows for purposive sampling of a wide, diverse and heterogeneous group of document types while allowing for recognition of the selectivity inherent in the strategy.

B. Data Sources and Search Strategy

The identification of documents was accomplished in four major ways.

- June to November 2024, the websites of a purposive sample of UK HEIs were searched for

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publicly available AI policy pages, academic integrity guidance, student facing information on acceptable use of the tools and staff development resources on pedagogy using GenAI. The sample covered all types of institutions, from Russell Group research intensive universities to post-92 teaching focused universities, specialist arts and conservatoire institutions and smaller HE providers.

- Secondly, there was systematic searching of the websites of the main sector organisations in the UK, such as the QAA, Jisc, AdvanceHE, the Office for Students, the Russell Group and MillionPlus. All publicly available guidance documents, position statements and briefings were retrieved for the period November 2022 to December 2024.
- Thirdly, commentary, case studies of the use of GenAI within institutions, and policy analysis were sought across sector press sources such as Research Professional, the Times Higher Education Supplement and Wonkhe.
- Fourthly, to find empirical and conceptual papers that explicitly addressed UK HEI policy response to GenAI, the academic literature was searched on Google Scholar and the Scopus database for the following search terms: "generative AI" AND "higher education" AND ("policy" OR "institutional response" OR "UK").

Table 1: Summary of Data Sources Included in the Narrative Review

Source Category	Types of Documents	Period	Volume
UK HEI Websites	AI policy documents, student guidance, assessment regulations, staff handbooks	2022–2024	~85 institutions sampled
UK Sector Bodies	Position statements, sector guidance, briefings (QAA, Jisc, AdvanceHE, OfS, Russell Group, MillionPlus)	2022–2024	6 bodies; 18 documents
Sector Press	Commentary, analysis, institutional case studies (Wonkhe, THES, Research Professional)	2022–2024	Selected articles
Academic Literature	Peer-reviewed papers on UK HE GenAI policy and practice	2022–2024	14 papers

C. Analysis

The documents retrieved were read and analysed by theme and typological categories were inductively developed through iterative reading of the document corpus as a whole (Bearman et al., 2023). The initial coding framework was generated in the first round of reading and was further enhanced and developed in two further iterations of coding. In response to the third research question documents were also specifically analysed for any explicit or implicit mention of disabled learners, inclusive pedagogy, reasonable adjustments, Disabled Students' Allowance (DSA), Universal Design for Learning (UDL) or assistive technology.

D. Limitations

There are obvious limitations in the narrative approach to the subject which can be clearly recognized and stated. This review remains a 'snapshot' review as it is not possible to review all UK HEIs' guidance on AI and the review is based on what can be seen and accessed online. The sampling of institutions and documents is a purposive sampling and it is impossible to avoid selection bias. In addition, as the landscape of GenAI is constantly changing, certain policies identified during data collection may have been updated, removed or replaced since then. These restrictions are recognised all the way through and findings are offered as a sign of the sector's trajectory in the direction of responses and not as a complete and definitive audit.

III. FINDINGS

A range of different but recognisable approaches to GenAI in the UK higher education sector were identified in the review conducted between 2022-2024. Based on an analysis of institutional policy documents, sector guidance and sector and scholarly analysis, four main typologies of responses were found: prohibition, cautious integration, pedagogical reimagining, and strategic silences. These typologies

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are not exclusive at the sector level: on the contrary, many institutions have changed their position on both types of typologies over the two-year period under consideration, in most cases towards more openness and more differentiated governance. Yet, they are meaningful variations in types of institutional interactions that bring to light shape of the sector's developing dynamics with GenAI.

The distribution of institutions across typologies is illustrated in Figure 1, which shows that by the end of 2024, a cautious integration became the dominant stance for the institutions across the sector, whereas prohibition was a progressive step and was mostly of a transitional nature. Even though it was not so apparent in its form, strategic silence was a very evident and important aspect of the landscape, especially for smaller and more specialist institutions.

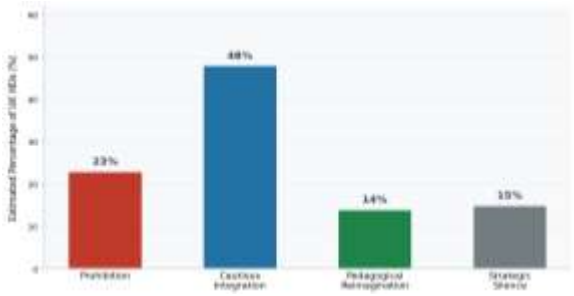

Fig 1: Distribution of UK HEIs Across GenAI Response Typologies (2022–2024)

A. Prohibition

The initial reactions from institutions to ChatGPT often focused on outright banning the tools or on significant limitations on their use in the assessed work. A number of UK HEIs announced blanket or near blanket bans on the use of AI tools by students in the first few weeks after the launch, instead, stating that the use of AI was a natural extension of existing policies on plagiarism (Cotton et al., 2024; Wilson, 2025 This initial response, while administratively expedient, proved difficult to sustain in practice. This was a natural and initially perhaps only logical way to do things in an institution that was putting in place a system of assessment which hadn't been created with GenAI in mind. The depictions of student use of AI tools as synonymous with academic dishonesty or fraud are common in institutional communications in this period, but have been complicated by later scholarship and policy discourse on the issue (Luo, 2024; Bearman & Ajjawi, 2023). This framing of academic integrity often also masked more complex issues regarding the acceptability of using AI in certain ways, when, and for whom.

Wilson (2025) has analysed the development of policies on AI at UK universities, and their findings lead to a clear picture of the disproportionate number of universities taking a prohibition stance in the early stages (January-March 2023) and the many that subsequently changed their stance as the practical issues and conceptual problems associated with a blanket prohibition became clear. The use of AI-generated text has proven challenging to reliably detect, the increasing sophistication of GenAI writing tools, widespread understanding that there are legitimate academic and assistive uses of these technologies and the potential for inequitable enforcement all led to a slow, but definite, across-the-board trend towards a softer stance on the issue as a governance response.

B. Cautious Integration

By mid-2024, thoughtful integration was becoming the preferred path in most parts of the UK HE sector; an approach that recognised the inevitability of GenAI in students' academic experience and sought to steer its use through graduated systems of permission, disclosure and transparency, and through differentiation in context and assessment. The Principles on the Use of Generative AI in Universities by the Russell Group (2023) offered a strong and widely-cited framework for this approach, outlining key principles focused on academic integrity, the rigorous application of the technology, and the need for careful guidance for students, rather than blanket prohibitions or uncritical acceptance.

This cautious integration position is often accompanied by a range of overlapping characteristics, including: clear, explicit statements that GenAI tools can be adopted for some uses, but not others; the obligation to attribute, cite, or disclose the use of GenAI in academic work; differences in the rules around acceptable use across various modules, assessments, disciplines, and/or levels of study; and continued willingness to review and revise

guidance as the technology evolves and as collective knowledge about its use increases (QAA, 2023; Jisc, 2023).

In the study by Arowosegbe et al., (2024) on perceptions of generative AI use in UK higher education, higher education institutions that were at the cautious end of the spectrum with regard to the use of generative AI often faced situations where the policies were unclear or ambiguous, with varying rules being applied across modules and departments, which led to uncertainty about acceptable use. This is certainly in line with the seminal finding of Ball et al. (2012) that policy texts are implemented unevenly, where local interpretive communities enact different versions of the same guidance in relation to the institutional cultures, resource availability, and priorities of their respective institutions.

C. Pedagogical Imagination

A more positive and empowering community of institutions looked to GenAI not as a threat to be contained or a risk to be carefully managed but as an opportunity for a radical rethinking of pedagogy. Some of the typologies identified involved deliberate curriculum redesign to embed AI literacy as a graduate attribute that came along with critical thinking and communication, or the intentional integration of AI literacy into the learning and assessment process itself (as opposed to the learner's final output) (Bearman & Ajjawi, 2023; Chan, 2023). Institutions in this category were more likely than other institutions to be in the post-92 sector and more likely than other institutions to be specialist HEIs with creative, technical and professional HEIs also showing signs of this orientation in some faculties or programmes. The pedagogical reimagination approach was inspired by the rising body of literature on how higher education should be reconceived in the age of GenAI in terms of its purpose, the types of human thinking and creativity it should foster, and the ways that learning and achievement should be measured and demonstrated in an AI-enabled environment (O'Dea, 2024; Bower et al., 2024; Bozkurt et al., 2023).

AdvanceHE has developed resources and guidance to assist academic staff to re-design curricula for the AI era, and clearly identifies AI literacy as part of a 21st century ‘graduate capability framework' alongside critical thinking and disciplinary expertise. A pro-active framing that is in line with Rogers's (2003) characterization of ‘early adopters’ as the people and institutions that see the innovative potential in a new technology and strive to make it happen, as opposed to simply tolerating its presence or opposing its diffusion.

D. Strategic Silence

The fourth typology was the one that was least apparent by its nature but was analytically significant because we could not find at the time of data collection any published policy or guidance about GenAI by institutions for which we had no publicly accessible record of any existing policy or guidance with respect to GenAI. Bacchi's (2009) idea of policy silence is taken here as a marker not of an administrative void or oversight but of an enactment – one that, however tacitly, tells the student and staff members that the school has not decided on an informed and communicated policy for a technology that is already at work in academic practice.

Strategic silence was disproportionately linked to smaller, more recent and specialist institutions, whether arts conservatoire, niche technical HEIs, or smaller higher education providers, all of which may not have had the organisational structure, time and resource for policy development, or relevant specialist expertise to develop quick and authoritative guidance (Wilson, 2025). In some cases, it seemed that institutions were tacitly following guidance provided by the sector bodies (QAA or Jisc) rather than creating their own resources and were not making a point of signposting this to their own communities of students and staff.

Students and staff who are forced to make decisions about GenAI without institutional direction will have significant consequences, most of which will be negative. When the guidance or interpretation of sector-level guidance is not institutionalised, this can leave people to make their own decisions and judgements, creating exactly the sort of inconsistencies, uncertainties and inequities that

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Arowosegbe et al. (2024) noted as a major worry for learners in the sector.

Table 2 offers a comparative summary of the four typologies of responses, together with the dominant framing, the temporal pattern and the estimated prevalence of the responses across the sector.

Table 2: Summary of GenAI Response Typologies in UK Higher Education (2022–2024)

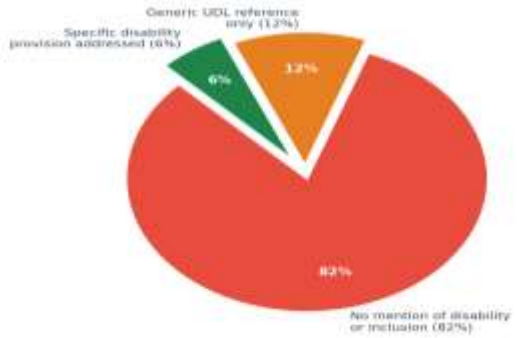
Typology	Description	Dominant Framing	Temporal Pattern	Est. Prevalence
Prohibition	Blanket or near-blanket restriction on student GenAI use in assessed work	Academic integrity risk; GenAI as cheating	Predominantly Jan–Mar 2023; most later revised	~23% (early period)
Cautious Integration	Conditional use; attribution/disclosure requirements; context- and module-specific rules	Risk management and transparency	Dominant position by mid-2024	~48%
Pedagogical Reimagination	GenAI as transformative pedagogy; AI literacy as graduate attribute; redesigned assessment	Opportunity, transformation, and future-readiness	Emerging; growing through 2024	~14%
Strategic Silence	No publicly accessible institutional policy or guidance	Absent or deferred institutional response	Persistent across full 2022–2024 period	~15%

E. The Disability Gap

The clear conclusion of cross-typological analysis is not any of the four response positions themselves but rather what is lacking from each: the near-universal lack of substantive and specific discussion relating to the implications of the GenAI policy for disabled learners. In the documents considered there was no mention of disabled students, no reference to reasonable adjustments provision, no reference to Disabled Students' Allowance (DSA), or no mention of assistive technology, and when it did these were only generic statements which didn't go far enough to provide disabled learners and staff with the specific guidance they needed.

As shown in Figure 2, only a few policy documents from institutions mentioned disability provision at all. Inclusion was often referred to in very generic or minimal terms (such as Universal Design for Learning (UDL) principles) or as general, institutional statements of equality and diversity, rather than in terms of the specific governance requirements and support needs of disabled students.

Fig 2: Extent of Disability and Inclusion Coverage in UK HEI GenAI Policy Documents (2022–2024)



This is important as regards the proactive, anticipatory, duty to make reasonable adjustments that the Equality Act 2010 imposes on UK HEIs (higher education institutions), the duty being to ensure that, when designing all policies and services, HEIs consider the needs of disabled students. There are real educational opportunities to be found in the applications of GenAI technologies with disabled learners in higher education; for example, text-to-speech and speech-to-text integration, reformatting content for dyslexia, content summarisation to reduce the cognitive load, and extended and scaffolded writing assistance are among the documented applications that hold potential for real (Luckin & Cukurova, 2019; Holmes et al., 2022).

However, there are new and largely unexamined equity issues that follow the use of the same GenAI

tools and have important implications for practice. Are there any unintended consequences of institutional restrictions on the use of AI that may impact students' ability to use tools that are equally as effective as AI as their formal reasonable adjustments? If some tools for producing AI-supported writing are regarded as legitimate assistive technology when provided as part of a DSA, are other similar tools for supporting writing used by other students – academic misconduct? Such questions are not only "consequential but urgent" and as this review will show, they are not fully answered in the current UK HEI policy.

Bacchi (2009) argues that institutional policy documents do not "just ignore these questions" but that it is a problem representation in which disabled learners are seen as not part of the primary audience of the governance of GenAI. Academic integrity policies that exclude, in practice, or seem to be exclusionary because they focus on the concerns and experiences of the notional, non-disabled 'average' student, could be as such (Luo, 2024).

IV. DISCUSSION

The results of this narrative review shed light on some key and interrelated aspects of the UK HE Sector's response to GenAI in 2022-2024. The picture, viewed from a range of theoretical perspectives (diffusion of innovations, policy enactment and policy silence) is of rapid but uneven change, a general trend from prohibition to tentative inclusion, with significant variation within the sector and a clear absence across all typologies of consideration of the needs and rights of disabled learners and a failure of policy to address them.

The diffusion of innovations model of Rogers (2003) is a useful model for understanding the overall diffusion of the sector. Based on this typological distribution, at the end of 2024 the UK HE sector was situated in the early majority stage of adoption with regard to cautious integration in the adoption curve and a substantial minority was still in the laggard or strategic silence end of the curve. Though smaller in number, the first-of-their-kind pedagogical reimaginations are also potential innovation 'champions' whose body of experience and evidence can influence sector-wide evolution over the coming years. But the diffusion of innovations model has a number of limitations as an explanation in this context: Rogers's (2003) model focused primarily on products and innovations, and was not constructed to do much with the contested, value-laden, and highly political nature of policy adoption in complex institutional settings.

However, these aspects of institutional life are much more salient in the policy enactment theory of Ball et al. (2012) and the analysis has focussed on how institutional actors do not just follow policies that are imposed upon them but actively interpret, challenge and rework policies in local contexts already saturated with other values, priorities, cultures and constraints. The substantial differences in how the shared principles of the Russell Group (2023) are being applied, as documented by Arowosegbe et al. (2024), is exactly the type of “local” interpretation variation in policy enactment theory predicts, and straight adoption models would find difficult to explain.

This is the disability gap observed in Section 3.5 – arguably the most important of this review – and is one that calls for ongoing efforts with the framework outlined by Bacchi (2009). The absence of a policy document is no innocent or neutral, but rather an expression of and a reinforcement of specific assumptions, priorities, and understandings about a problem that may be as significant as what is explicitly stated in a policy document. Most UK HEI GenAI policies implicitly assume that 'the student' is normatively non-disabled, effectively mirroring a kind of 'normative exclusion' that has been called out by disabled learners and disabled scholars when the design of educational policies and environments fails to meet the needs of disabled learners (Holmes et al., 2022).

This gap in the implications is also ethical and legal. The Equality Act 2010 duty on institutions is to make anticipatory reasonable adjustments and is a duty to consider the needs of disabled students in the design of institutional policies and services, rather than waiting for disabled students to identify their needs.

The lack of awareness of many institutions in relation to the need for a policy that takes account of their current reasonable adjustments obligations would seem in many instances to be a significant failure to meet this anticipatory obligation.

The large and expanding number of disabled students in UK higher education is also of crucial practical concern, the size of this group of disabled students in UK higher education has grown significantly on the sector in recent years, and there are important practical implications for this sector. Disabled students who are using GENAI based assistive technologies in their approved access plan may find themselves in a real 'tight spot' when it comes to difficult institutional policies that lack clarity and fail to account for assistive use as well as academic dishonesty that prohibition or 'cautious integration' policies are intended to stop. These students and their disability support practitioners are not given clarity because of the lack of explicit and substantive institutional guidance on this distinction.

V. CONCLUSION AND IMPLICATIONS

The purpose of this narrative review is to have charted the typologies of institutional responses to generative AI in UK higher education during the timeframe 2022-2024 which included: prohibition, cautious integration, pedagogical reimagining, and strategic silence. By mid-2024, cautious integration had become the dominant institutional stance in the sector, as a wide cross-section of the sector had come to accept that GenAI is an inevitable part of students' academic experiences, while they continue to grapple with its impact on academic integrity, assessment validity, and what it means to be a student author.

The key issue highlighted by the review is not so much the typological distribution itself but rather the cross-typological disability gap – the widespread absence of the specific and consequential impact of the governance of GenAI tools on disabled learners, inclusive pedagogy, and the provision of reasonable adjustments under UK equalities laws. This is a major shortcoming in the governance of GenAI in UK HE today, and has real-world implications for the many, and rapidly growing, disabled students in the sector.

The results have definite implications for Policy and Research. The need at policy level is clear – there is a pressing requirement for guidance that is explicit and substantively addresses the intersection of governance of GenAI and disability provision, and this guidance needs to be developed by sector bodies, such as the QAA, Jisc, AdvanceHE and the OfS. This guidance should address the anticipatory reasonable adjustments requirements set out in the Equality Act 2010, the possibilities of GenAI as an assistive and inclusive technology and the genuine dangers of poorly thought out governance arrangements that could be harmful to disabled learners. As part of their duties and not as an incidental to institutional AI strategies, disabled students' needs must be considered and addressed.

This review demonstrates a clear need for the research community to undertake future research in a systematic and rigorous method, namely a systematic scoping review of the evidence base surrounding GenAI use with and for disabled learners in higher education, including both the potential benefits of GenAI as an assistive and inclusive technology and the risks that may result from poorly designed governance frameworks. The lack of this research is important for equity, inclusion and the achievement of disabled student's legal rights in an AI-enhanced education system.

In more general terms the review highlights that institutional policy should also pay attention to the things that it systemically ignores, as well as what it ignores. Just as with any other policy, inclusive pedagogy and equitable governance can't be imposed on GenAI policy as an afterthought, but are meant to be incorporated into the design of how AI is governed in a responsible and equitable way in higher education. But a disability gap that has been identified is fundamentally a design failure – one that the UK higher education sector has the power to correct and one that the sector has the responsibility to correct – and one that must be done with urgency.

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