



QA Responsible Use Statement

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1. Introduction

At QA, including but not limited to QA Limited and QA USA, Inc. (together “QA”), our mission to empower our people to harness AI, technology, and human skills to drive transformation and shape the future in a changing world.

Our vision we leverage AI to create seamless, adaptive learning and client experiences, accelerating data-driven decisions that raise standards and drive performance.

Artificial Intelligence (“AI”) involves a form of technology where either software or a machine use data-driven methods to learn, adapt or perform tasks, some of which may replicate human-like behaviours while others extend beyond human capability.

The use of AI is becoming increasingly embedded across the services we deliver, supporting both internal operations and external services offered to our clients. At QA, AI plays a central role in enhancing learning experiences, improving outcomes, and supporting our clients with high-quality service. AI works alongside our people to strengthen and elevate the services we provide, rather than replace human judgment or expertise.

At QA we are committed to the responsible use of AI across our products, services and learning platforms. As AI becomes more deeply embedded in how we operate, we ensure its use aligns with global best practices, ethical standards and user trust. This commitment is reflected in our responsible use and ethical principles set out below.

QA is committed to ensuring **responsible use** of AI by:

- **Being transparent** where appropriate in disclosing when we are using AI within our services and/or where content is created by AI then
 - marking, where applicable, any content generated by AI as such; and
 - including any reference used by the AI in generating the content within footnotes.
- **Constantly improving and evaluating the use** of each deployed AI tool used. For example, for inaccuracies within the AI generated content, copyright and intellectual property infringement.
- **Adopting policies and procedures** to ensure appropriate measures are in place to ensure effective oversight of AI use. This includes providing employee training on responsible and proper use of AI.
- **Following government guidelines, legislation and advice** as applicable to ensure that AI usage by us follows any applicable laws and regulations. This includes regularly checking for any updates or changes made by a relevant authority.
- **Obtaining consent** where appropriate from clients and users for use of any of their data prior to any use of AI functions within the QA Group’s services. For example, certain AI functions may require tracking of a client responses to provide an enhanced service.
- **Collaborating** with experts and industry leaders to promote a culture of AI innovation within our organisation, including drawing on expert insights to ensure we continue to meet the latest governance and ethical standards in an ever-evolving landscape.

- **Having a client centric approach** to improve customer experiences, offering personalised learning pathways, experiences and being agile and responsive to trends, whilst protecting an individual's privacy.

2. Our AI Ethical Principles and Alignment with OECD AI Principles

To support our responsible use of AI we've developed a set of ethical principles which provide the framework for how we use, develop or implement AI throughout QA. These principles are carefully aligned with the internationally recognised **OECD AI Principles**, ensuring that our AI solutions are ethical, trustworthy and beneficial to all stakeholders.

Our 7 ethical principles are:

1. We will aim to ensure human oversight and explainability over AI.

We will aim to ensure that our AI is subjected to the appropriate direction, control and oversight by a human. We will develop AI which allows the end user to give appropriate feedback and provide relevant explanations.

2. We will aim to ensure fairness and representation in the input and output of AI.

We understand that AI algorithms and data sets can have the effect of reducing, reinforcing or reflecting unfair bias. We will seek to avoid any unfair bias within our AI systems by rigorously testing any AI applications which are used, implemented, or developed within QA.

3. We will aim to incorporate privacy and data governance into our application of AI.

We will aim to incorporate all relevant privacy policies and principles into any development, implementation, and use of AI applications to ensure that there are the appropriate safeguards and control over use of the data. We will aim to give the opportunity for notice and/or consent over any use of a user's data by an AI tool.



4. We will aim to be transparent in our use of AI.

We will seek to disclose when a user is interacting with an AI tool or where we have used any content created by an AI application.

5. We will aim to be accountable in our use of AI.

We have various mechanisms in place to ensure responsibility and accountability for AI used, implemented, or developed by QA, including redress mechanisms, for the duration of the AI's lifecycle.

6. We will aim to ensure the safety and security of AI's application.

We will continue to develop and incorporate processes into our monitoring and evaluating of AI to ensure that the AI is secure and reliable throughout the AI's lifecycle. We will ensure that any AI developed by QA has the necessary safeguards in place to ensure the AI is not used for harmful purposes.

7. We will take into account social and environmental factors in our development and application of AI.

We will seek to monitor and measure, to the extent reasonably possible, the social and environmental impact of all AI implemented, used, or developed by QA.

By aligning our internal ethical principles with the OECD AI framework, we ensure that our AI technologies meet the highest standards of trustworthiness, fairness and social responsibility.

3. Governance and Oversight

We have implemented a structured AI Governance Framework to ensure ethical design, deployment and ongoing monitoring. Key features include:

- An internal AI Governance Committee
- Internal AI policy for all staff to comply with
- Staff training in responsible AI use and bespoke training for specific AI tools
- Due diligence processes and oversight for all third-party AI tools and vendors.
- All AI tools and initiatives must be reviewed and approved by the QAI team, who maintain central visibility and oversight before any onboarding, trials, or use take place.

4. AI Across Our Services and Products

At QA we use both generative AI ("Gen AI") and traditional AI ("Traditional AI") collectively referred to as "AI".

- **Gen AI** is learning models that can generate high-quality text, images, and other content based on the data they were trained on. Examples: GPT, Eia
- **Traditional AI** usually refers to standard AI such as Machine Learning models. Examples: Smart Assessments and the Content Recommendations where we use users' consumption and the exam questions' to support the features.

We use this AI to enhance experiences, improve outcomes and increase efficiency across multiple parts of our organisation. Below is a high-level overview of where AI is applied.

5. What AI do we use AI in Our Services?

5.1. AI in our Live Learning Services- i.e. Virtual or Classroom

There is currently no AI in our learning services, but we plan to integrate Ela into some products in the coming months. AI is currently focused on our digital platform rather than on live virtual or classroom delivery learning services. Over time, we plan to integrate our learning assistant Ela and other AI capabilities more broadly across our learning services, always in line with our governance and Responsible AI principles.

5.2. AI in Apprenticeships

Within our apprenticeships, we provide apprentices with access to our QA Platform (as described below), which includes AI capabilities. Aside from the AI integrated in our platform, there is currently no other AI available through our apprenticeship offerings.

5.3. AI in our Digital Platform

QA Limited employs a range of AI technologies across its Learning Platform, with a strong emphasis on privacy, security, and transparency. The AI technologies used are divided into three main categories:

1. Products and Features Based on Generative AI (GenAI)

· Technology and Integration

QA utilises Generative AI (GenAI) technologies powered by out-of-the-box Large Language Models (LLMs), such as GPT, which are provided by third-party vendors such as OpenAI. These LLMs are integrated into our platform via secure APIs, meaning QA does not train, fine-tune, or otherwise modify the underlying models.

· Data Provided to LLM

- User-activity information: Data concerning user input and ongoing dialogue within the platform is shared with the LLMs to support relevant responses.
- Content information: Contextual details such as course titles, descriptions, and transcripts are supplied to help the AI generate accurate and context-aware answers.
- Instructions: Explicit guidance is given to the LLMs to ensure correct interpretation of data, reliable response generation, avoidance of inappropriate content, and prevention of hallucinations.

· **Privacy and Security**

QA Limited places strong emphasis on privacy. No personally identifiable information (PII) is intentionally transmitted to the LLMs. Users are reminded not to include PII or any sensitive data in their interactions. No personally identifiable information (PII) is intentionally transmitted to the LLMs. Users are reminded not to include PII or other sensitive data in their interactions. We implement technical and procedural safeguards to minimise and detect any accidental sharing of PII with external AI providers.

· **Purpose and Application**

The integration of Generative AI systems aims to generate helpful responses, provide contextual assistance, and enhance user experiences through intelligent, conversational interfaces. These systems are designed to improve engagement and support across QA's platform.

· **GenAI Products Summary:**

- Learning Assistant (ELA): An AI chatbot built into select courses that helps learners with course material and answers questions using large language models and course transcripts.
- Lab Assistant (ELA): This AI chatbot available in hands-on labs supports labs by offering personalised feedback and troubleshooting advice during coding exercises.
- Simulation Labs: These labs feature AI-simulated characters and provide immersive real-world training scenarios that help develop both technical and soft skills.
- Internal Course Recommendation Tool: This is an internal tool which suggests courses to stakeholders based on customer requirements and training objectives, using GenAI to generate recommendations.

2. Products Based on Traditional AI/Machine Learning (ML)

· **Technology and Model Management**

QA Limited utilises standard machine learning libraries, such as scikit-learn in Python, integrated within its secure, cloud-based architecture. All AI and machine learning models are constructed, trained, and managed internally by QA's own teams.

· **Data Used for Training:**

- User activity information: Includes details about the content users engage with (titles, descriptions, difficulty levels, transcripts, etc.).
- Content information: Refers to information regarding the available content within the library.
- Minimal PII for platform security: In certain instances, a limited amount of user information is combined with behavioural data to bolster platform security.

· **Privacy:**

With the exception of select internal security features, personally identifiable information (PII) is not used to train or operate other algorithms.

- **Purpose:**

These systems assist with content recommendation, analyse user engagement, and offer other functionalities that enhance the learning experience. Internal security features aim to identify and restrict misuse of platform resources by evaluating user attributes and behaviour. These features function discreetly and target specific user groups.

- **Traditional AI/ML Products Summary:**

- Content Recommendations: Personalised learning suggestions are provided based on user activity and course details using traditional AI models.
- Skills Assessment and Personal Training: User skills are estimated from assessments and lab outcomes to recommend tailored training materials.
- Internal assessment content generation tool: This AI-powered internal tool creates multiple-choice questions from training materials to streamline assessment creation.
- Internal platform security tool: An internal feature that identifies potentially abusive users by analysing user and behavioural patterns to protect platform resources.

3. Internal AI Tooling & Observability

- **Technology and Integration**

Internal observability and debugging platforms, including solutions from third-party vendors, are implemented exclusively within development and sandbox environments. These tools enable the monitoring, debugging, and analysis of AI-driven features prior to production release.

- **Data Provided to Tooling:**

- Developer-generated input: Only test data created by developers is used for testing and debugging.
- Anonymized sample data: If sample data is needed, it's anonymised and contains no real user information.
- No customer PII: Customer PII or live user data is never sent to these tools.

- **Privacy:**

The tools are not permitted in production and have strict controls to ensure only non-sensitive, anonymised, or developer-generated data is utilised.

- **Purpose:**

They offer centralised visibility into every stage of the AI pipeline, help with debugging, and support improving the quality and reliability of AI features prior to release.

- **Internal Tooling Summary:**

Internal observability platform: This platform is used for monitoring and debugging AI features exclusively within development environments and does not handle any customer PII.

· Key Points

Separation of Approaches: There is a clear split between generative AI (using external LLMs) and traditional AI/ML (managed internally).

- **Data Handling:** Both approaches use user activity and content information; PII is strictly excluded unless absolutely necessary for platform security, and even then, only minimal information is used for internal purposes.
- **Security and Privacy:** Customers have security options, including opting out. There is a strong emphasis against sharing PII with external AI providers. Internal security features are not visible to customers and are limited to certain user groups.
- **No Internal LLM Training:** For GenAI products QA do not train or fine-tune LLMs; they are used directly via API, and no PII is sent to third-party providers.
- **Internal Model Training:** All model training and management for traditional AI/ML is conducted internally, ensuring control over both data and algorithms. With the exception of limited internal security features, PII is excluded from both training and inference for these models.
- **Internal AI Tooling:** Internal observability and debugging tools are restricted to development and sandbox environments. No customer personal data or live user data is sent to these tools; only anonymised or developer-generated data is used for testing and evaluation. These tools are not active in production and are not approved for handling actual customer data.

6. Frequently Asked Questions (FAQ)

1. How is the use of AI governed in QA?

- Use of AI within the QA Group must be in line with the QAI ethical principles, which are compliant with the OECD AI principles and applicable laws.
- Any personal data used within AI must be compliant with the ICO's data guidelines.
- We have a cross-functional AI Governance Committee that meets at least once a quarter which analyses and evaluates our use of AI within the QA Group.

2. What if a client does not want to use a certain AI product or features in our services?

- Certain AI products and features can be turned off for clients, such as our Ela, but others are core for the features within the platform and/or services, for example Smart Assessments.
- However, turning off any of our AI products and features may affect the learning journey of the client and their users as it limits the services which QA are able to provide. We want you to have the highest and best service so we hope you permit us to use AI to accentuate your learning experience and deliver value to you.

3. How does QA use your data in AI on our platforms?

- QA Group uses data on users' interactions on our platforms (“**Platform Data**”) to interact with

Traditional AI.

- This Platform Data helps our Traditional AI to help develop, improve, and provide our services.
- All data used in our Traditional AI products or features is pseudonymised or aggregated wherever possible, and we minimise the use of personal data.

The only exception is a small number of internal security features (such as our malicious user detection capability), which use basic PII (e.g. email address) alongside behavioural data to protect the platform from abuse. These internal features are not customer-facing and are limited to specific user groups.

- QA uses data in our Gen AI features, such as chat history, for internal business purposes, to ultimately provide our services to you and indeed a better, and more high quality and bespoke user experience. These purposes include, but are not limited to, ensuring compliance with terms of use; for partners, such as exam bodies; and to help develop, improve, and provide our services.
- For the avoidance of doubt, any content, materials, answers or other collateral which is inputted by a learner into our Platform is **not** integrated into Gen AI.
- We have various processes and procedures in place to seek to ensure that content inputted, and output generated by Gen AI comply with our QAI ethical principles, applicable law and/or guidance issued, for example that the Gen AI outputs are fair and representative.

4. What does QA do with client content uploaded onto QA platforms?

- If a client uploads content to the platform for use by themselves or their company's users, our Traditional AI will analysis this content to personalize the experience for the client and its users in order to support their learning journeys. Clients may request that their uploaded content be excluded from personalized experience.
- All use of any client content is limited to the client or the client's company and its users only.

5. Can QA ensure that our users of their AI products or features do not input or include any of our confidential or proprietary information in the AI?

- We cannot fully oversee what our client's and/or their users input into our Platform or any of our AI products. Client's and user's interactions and content inputted into our AI products and features is entirely at their own risk and liability.
- Clients will need to ensure that they have policies and procedures in place which govern what their users of our AI may input into our AI models.

6. Do QA's AI systems make decisions without human involvement?

QA's AI systems are primarily used to support learning and decision-making, not to fully automate it.

- In most cases (e.g. course recommendations, Ela, skills assessments), AI suggests content or provides guidance, and learners, tutors, or managers remain responsible for decisions.

- For internal security features (such as malicious user detection), AI may flag potentially abusive activity, but actions taken on those flags are subject to human review and internal processes.

Our AI Governance and Responsible AI frameworks require appropriate human oversight proportionate to the risk level of each AI product.

7. Is personal data used in QA's AI models?

We follow a data minimisation approach and avoid using personal data in AI wherever possible.

- For Generative AI features (such as Ela), we do not intentionally send personally identifiable information (PII) to third-party LLMs (e.g. OpenAI GPT). We remind users not to include PII in their prompts and use safeguards to minimise accidental disclosure.
- For most Traditional AI/ML features (such as content recommendations and skills assessments), we use usage and content data, not PII, to train and operate models.
- The only exception is a small number of internal security features, such as a malicious user detection capability, which use basic PII (e.g. email address) together with behavioural data to identify and restrict abuse of platform resources. These tools are internal-only and not visible to customers.

All AI products must comply with our Responsible AI and data protection requirements.

8. How does QA prevent bias in your AI systems?

We design and operate AI systems to reduce the risk of unfair bias:

- Our Responsible AI principles require that AI outputs must not be discriminatory, biased, or unfair, and that known fairness risks are identified and mitigated where possible.
- During design and testing, we review training data and outputs for patterns that might indicate systematic bias (for example, consistently favouring or disadvantaging particular groups).
- For higher-risk or customer-facing AI products, we use ongoing monitoring and periodic reviews to identify emerging issues and adjust models, prompts, or safeguards as needed.

No AI system can be guaranteed bias-free, but we actively work to identify, document, and mitigate fairness risks.

9. Can I understand how QA's AI made a decision?

Our goal is to make AI-supported outcomes understandable and explainable, especially where they may affect learning or business decisions.

- For features like content recommendations or skills assessments, we can typically explain the main factors influencing an outcome (e.g. prior activity, course difficulty, assessment responses).

- For Generative AI features (such as Ela), we use prompts and guardrails that encourage the AI to provide clear reasoning or references where appropriate (for example, pointing back to course content).
- Internally, each AI Product has an AI Product Card that documents its intended use, inputs/outputs, and known limitations, which supports explainability.

10. What happens if QA's AI system makes an error?

We recognise that all AI systems can make mistakes. When they do:

- Users can report issues or harmful outputs through feedback mechanisms built into our products or via our standard support channels.
- Reported issues are reviewed by the relevant product and data/AI teams, who may correct data, adjust prompts, retrain or tune models, or add additional safeguards.
- For higher-risk AI Products, we run recurring AI risk, compliance, and product reviews to track errors, assess impact, and prioritise fixes.

Our Responsible AI and Governance frameworks require clear ownership and remediation processes for AI-related issues.

11. Does QA use third party AI tools?

Yes. We use carefully selected third-party AI providers where they add value and meet our security and compliance standards.

- For Generative AI, we use out-of-the-box Large Language Models (LLMs) from vendors such as OpenAI, accessed securely via API. These models are not trained or fine-tuned on QA data unless explicitly documented.
- We also use third-party tools for observability and debugging of AI pipelines in controlled development and sandbox environments only; they do not process live customer data or PII.
- All AI vendors are subject to our vendor risk assessment and governance processes, including security, privacy, and Responsible AI considerations.

Details for specific vendors, such as OpenAI, are documented in our internal AI vendor pages.

12. Will I be informed if AI systems change?

Yes. QA will inform you when AI-related changes affect your service or require you to take action. AI model and feature updates are governed by QA's formal change management process, which includes notifying relevant clients as applicable.

For the multi-tenant QA Group Learning Platform, routine updates may occur without proactive notice; however, if an update impacts your users or requires configuration on your side, QA will provide advance notice via in-product messages, website notifications, or email.

13. How can I provide feedback or raise concerns?



We encourage feedback on all AI-powered features. You can:

- Use any in-product feedback tools (for example, thumbs-up/down or feedback forms) where available.
- Contact us via your usual QA account manager or support channel, clearly indicating that your query relates to an AI feature.

Feedback and concerns are routed to our product, data, and governance teams and are considered as part of our ongoing AI risk, compliance, and product review

