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When Clarity Creates Interpretive Load: A Policy Document Analysis of Student GenAI Governance in Assessment Across the UK's G5 Universities

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Abstract. While institutional policies on regulating student generative AI (GenAI) use in assessment have multiplied in higher education, their soaring number may not guarantee effective governance. Previous studies have highlighted persistent barriers including violation of academic integrity, student overreliance, and assessment invalidity, whereas more internal factors around how policy per se can undermine prospective clarity and exacerbate governance dilemma are still underexamined. Therefore, this study interrogates existing issues around institutional GenAI-regulatory materials themselves. Employing the concept of 'interpretive load', this study examines the governance dilemma through a specific lens of how students bear the burden to navigate and understand the institutional policy architecture and language before starting assessments. Through a policy document analysis of a purposive sample of materials published by the UK's G5 universities, this paper identifies three issues – policy proliferation, policy fragmentation, and policy ambiguity. These three findings represent crucial mechanisms that progressively enable institutions to transfer responsibility for clarification to students, consequently placing interpretive load on students. Crucially, this paper concentrates on a relatively new notion of interpretive load, which implies ample scope for theoretical investigation and offers directions for future institutional policy making and research orientations within the field.

Keywords: Interpretive load, Generative AI, Assessment policy, Higher education, Policy document analysis

1. Introduction

As GenAI is increasingly integrated into higher education, this integration necessitates regulation to avoid arbitrary usage. Universities worldwide have therefore continually formulated and enacted institutional policies and guidelines to standardize student GenAI use and establish universal applicability across diverse disciplines [1, 2]. However, the soaring number of institution-wide policies might not guarantee effective governance, as recent literature has underscored persistent obstacles related to students and assessment, such as academic dishonesty, AI overreliance and assessment invalidity [3-5]. These obstacles have raised significant concerns around student GenAI regulation, constituting a governance dilemma.

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Nonetheless, this governance dilemma is not solely attributed to external factors concerning students and assessment design, but also to internal factors in the policies themselves. Despite aiming to inform students of responsible GenAI use, few GenAI policies in higher education truly incorporate student feedback in their wording, although students are directly affected by these policies [6]. These internal deficits make it difficult for students to comprehend policy details, thus leading to external issues of GenAI misuse and overuse [7, 8].

With emerging attention to these internal problems in policy framings, the promised clarity of these policies has also come under scrutiny. As Gonsalves argues, institutional policymaking on student GenAI governance aims to be clear, but its specific wording undermines that clarity by containing ambiguous statements that place an extra burden on students to interpret and comprehend these diverse and vague policies [9]. This additional pressure students need to address before starting assessments is conceptualized as 'interpretive load' [9].

Current literature has frequently discussed external factors in the GenAI governance dilemma, while research on internal impediments originating from the policy itself is emerging but under-investigated. Consequently, this study conducts a policy document analysis of a purposive sample of institution-wide materials from the UK's G5 universities, aiming to explore issues in the sampled institutional GenAI guidelines, particularly how they may impose interpretive load on students. This study seeks to inform future policy and research on achieving truly clear governance of student GenAI use in assessment in higher education.

2. Literature review

Existing institutional GenAI policies increasingly recognize both the opportunities and threats posed by GenAI in student assessment in higher education. However, meticulous consideration of GenAI use may not be clearly manifested in policy framings [6, 10]. First, as regulations proliferate, their content can overlap, and these documents frequently cross-reference other normative prescriptions, undermining the efficiency of policy implementation [11]. Additionally, institution-wide policies may frame GenAI governance differently compared to lower-scale guidance. Universities partially delegate autonomy to faculties, departments, courses and even instructors [12], forcing students to decide which guidelines to follow among numerous, often conflicting, institution-wide and faculty-specific policies [13]. Ultimately, the wording itself is often ambiguous: core terms may be defined with indeterminate descriptions or left undefined [9], and policies may provide multiple, inconsistent definitions for the same term, making prescriptions both punitive and vague [14].

Overall, existing research has emphasized persistent external problems and increasingly recognized internal issues with the policies themselves. Despite emerging discussions on policy-based problems, current literature pays limited attention to how specific policy framings complicate student comprehension and create a burden for students when they decipher policy narratives before starting assessments. Therefore, this paper investigates how institution-wide GenAI policies themselves can problematise student GenAI governance and potentially create interpretive load, providing evidence to inform future policymaking and research.

3. Method

To explore issues around institutional GenAI guidelines, particularly their potential production of interpretive load, this study employed policy document analysis. This method is well suited to in-depth textual analyses of how specific policy frameworks and narratives create complexity and ambiguity for student interpretation [15].

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This study purposively collected a sample of policy documents from the UK's G5 universities: Oxford, Cambridge, Imperial College London (IC), University College London (UCL), and the London School of Economics and Political Science (LSE). These policies are publicly available and regularly updated, ensuring a current and accessible corpus. The five universities represent prestigious, research-intensive institutions in UK higher education; their GenAI regulations are therefore exemplary and likely to shape wider governance discourses [16]. Although research on top-ranking universities has emerged worldwide, case studies focusing on UK higher education, particularly the G5, remain limited [17]. This study thus draws on an influential yet under-researched corpus, without claiming general representativeness for the entire UK higher education sector.

4. Results

4.1. Policy proliferation: navigating an expanding governance architecture

To promote and simultaneously regulate GenAI integration into higher education, all the G5 universities have enacted multiple interconnected documents. As Table 1 shows, these institutions provide both GenAI tool guidance and training resources. These materials embed links to institutional support, helping students effectively harness the potential of GenAI in their assessments. These universities deploy distinctive approaches to choosing GenAI platforms, varying from full autonomy to recommending a specific application, and they commonly direct students to further explanatory materials.

Table 1. Available institutional GenAI support at the G5 universities [18-22]

University	GenAI tool guidance	Training resources
Cambridge	No restriction on which tool to utilize, only the appropriate and inappropriate uses of the chosen tool	N/A
IC	Safe and easy access to multiple GenAI models through a single interface	short, IC-produced training experience for all students
LSE	For permitted use in assessments, students are encouraged to use Microsoft Copilot for its enhanced data privacy and security protections	a course aims to develop student AI literacy and further develop their skills of appropriate GenAI use
Oxford	University access to secure, enterprise-level ChatGPT Edu, Google Gemini, Microsoft Copilot Chat, Notebook LM; key uses and caveats of these tools	N/A
UCL	Microsoft Copilot as the recommended GenAI model to be used in assessment	Introductory course: Generative AI and academic skills

Regulatory materials from the G5 universities aim to manage student GenAI usage, rendering them prescriptive. As Table 2 shows, all the G5 universities formulate explicit GenAI principles on its restrictive usage in assessment.

Table 2. Institution-wide regulations on student GenAI use in assessment [23-27]

University	Brief introduction
Cambridge	Use of GenAI tools in summative assessments, with references to misconduct penalties

DOI: 10.54254/2753-7048/2026.37261

Table 2. (continued)

IC	GenAI principles based on IC core values, with references to institutional strategies and Russell Group guidance
LSE	Redesign of assessments to govern student GenAI use, with references to institutional three-position framework and flexible explanations
Oxford	What students must be aware and comply to around GenAI use in summative assessment, with references to misconduct procedures and related policies
UCL	How to effectively and responsibly engage GenAI in education and assessment, with references to library guides, three-position framework and misconduct policies

However, the frequent cross-references to other sources place a burden on students to determine the relevance between the policy and its inserted links. The policy documents in Table 2 all make reference to other prescriptive frameworks, ranging from administrative misconduct procedures to academic strategies and stratification of permitted GenAI in assessment. Such interconnections between instructional materials progressively enlarge the GenAI governance architecture, without guaranteeing that students can navigate them clearly. As a result, students must shoulder additional stress to comprehend and interpret prescriptive policies that are essential for determining what GenAI use is permitted in their assessments.

Furthermore, the G5 universities weave punitive elements into GenAI governance. Cambridge, Oxford, and UCL explicitly link GenAI misuse to academic misconduct, with consequences including penalties and expulsion. These administrative regulations are framed in an arcane tone and are highly detailed, such as Cambridge's 96-page chapter and Oxford's 41-page procedures [28-29]. Therefore, students need to spend extra time and energy, i.e. interpretive load, not only harnessing university-offered opportunities, but also navigating an increasingly expansive, highly prescriptive, and inherently punitive GenAI governance architecture.

4.2. Policy fragmentation: distributing interpretive authority to layers

GenAI policies from the G5 universities also decentralize authority to define local regulations. Universities can not only enact institution-wide GenAI guidance, but also delegate authority to lower layers such as faculties and departments to interpret their local regulations. However, as the governance structure varies among the G5 universities, there emerge two patterns regarding the extent to which local-specific guidance should be prioritized (Table 3). Cambridge and Oxford, where colleges are separate legal entities, use more definite language, such as 'should' and 'always', to directly inform students that they should follow discipline-specific guidance when they are confused about GenAI use in their assessment. By contrast, institutions with lower-level faculties, IC, LSE, and UCL, appear more eclectic about fragmented guidelines, using probabilistic modal verbs such as 'may' or setting a default baseline to make institutional and layer-specific guidelines compatible with one another to regulate GenAI usage.

Table 3. Policy narratives on fragmented interpretive authority [19, 21, 23, 25, 27]

University	Exact content (emphasis added)
Cambridge	'Students should always review local guidance from their department or faculty as well as information in the assignment itself'
Oxford	'Always follow any advice and guidance of your tutors or supervisors, and of your department or faculty, and/or college, on what is appropriate in your subject area'

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Table 3. (continued)

LSE	'Assessments need to be redesigned… Departments may consider implementing one or more of the following observed assessment approaches'
IC	'Departments may take differing views on how GenAI is best applied in teaching and assessment environments. It is recommended that you speak with staff to establish how GenAI might interact with your programme'
UCL	'If you are unsure about what constitutes acceptable use of GenAI in an assessment, ask for clarification from the module leader. If no explicit instructions are given, the default for assessments should be that you use GenAI in an assistive role while making sure that the final submission is still substantially your own work'

Despite these differences, all five universities recognize the importance of local guidelines. Faculties, departments, programmes, and even individual module leaders are authorized to issue their own instructions, dispersing policymaking authority across multiple layers. This fragmentation forces students to navigate numerous, potentially conflicting prescriptions. Although policy documents sometimes indicate priority or compatibility, the layered structure ultimately shifts the burden onto students, who must decide which rules to apply to a given assessment.

In specific policy language, the transfer of responsibility for reconciling fragmented interpretive authority to students is directly stipulated. Many GenAI policies use absolute wording that positions students as 'ultimately' or 'fully' responsible for everything they submitted [18, 21, 30]. Consequently, students are held accountable for identifying relevant prescriptions from an extensive governance architecture, which is primarily constructed by numerous fragmented layer-specific GenAI policy materials without sufficient student voice.

Regulations on acknowledging GenAI use offer a clear example of how the G5 universities render students responsible. As Table 4 illustrates, the five institutions all perceive GenAI acknowledgement as indispensable in academic work, evidenced by frequent linguistic choices of 'should' and 'must'. However, for LSE and Oxford, their policies are deficient in providing students with concrete procedures and examples for declaring GenAI use in assessment [20, 21]. For Cambridge, IC, and UCL, despite provision of guidelines and instances on acknowledging GenAI, coexistence of institution-wide materials and diverse subject-adapted instructions can confuse students about which normative policy to follow, particularly for cross-disciplinary courses and assignments [18, 31, 32]. Given these situations, students are still accountable for deciphering insufficiently explained and widely distributed GenAI documents.

Table 4. Policy narratives on acknowledging GenAI use in assignment [18, 20, 21, 31, 32]

University	Exact content (emphasis added)
Cambridge	'You may use AI to support your studies… Any AI use in assessed work must be declared'
IC	'You should include a statement to acknowledge your use of GenAI tools for all assessed work, in accordance with guidelines from your department or course team'
LSE	'… how students should acknowledge the use of GenAI in their assessments'
Oxford	'You must make a formal declaration of any permitted AI-use in the format prescribed by your assessment setter'
UCL	'The use of GenAI must be acknowledged in any piece of academic work where it has been used as a functional tool to assist in the process of creating the academic work, such as drafting ideas and planning or structuring written materials'

DOI: 10.54254/2753-7048/2026.37261

4.3. Policy ambiguity: interpreting undefined terminology with burden

When students ultimately reach the stage to interpret specific policy terms, they are required to address terminological ambiguities. Initially, the same terminology is defined inconsistently, such as the term 'GenAI'. In Table 5, the same university presents distinct definitions of GenAI in their policies. These varying definitions, despite being enacted during similar periods by the same university, reveal either a different scope or a changing emphasis on GenAI.

Table 5. Definitions of GenAI in Cambridge and UCL's policies [22, 27, 30, 33]

University	Exact content (emphasis added)
Cambridge	1. 'a system which uses computer systems with some qualities of human brain to produce content such as text or images' (Adapted from Cambridge dictionary) 2. 'typically describes any type of AI which can be instructed to produce content… both standalone GenAI tools and GenAI features in software and systems'
UCL	1. 'a specific type of AI that can generate seemingly new or original content, in response to a prompt, which can normally be inputted using natural language' 2. 'a technique in artificial intelligence in which outputs such as text, images, code, music, and video are generated by software'

Ambiguities of terminology exist not only in inconsistent definitions of the same term, but also in vague or even absent definitions. For instance, when stipulating the extent to which students should harness and declare GenAI use in assessment, the precise boundaries remain vague. While universities aim to clarify how students should use GenAI in a restrictive manner, their policy details can complicate students' comprehension.

As shown in Table 6, institutional regulations remain vague on how and which categories of GenAI use require declaration, and they blur operational boundaries among different layers of permitted GenAI deployment. Moreover, GenAI policies of the G5 universities might leave core terms undefined. In LSE's observed assessment policy, the fundamental term 'observed assessment' lacks a clear definition [25]. Oxford stresses that principles of 'integrity, honesty and transparency' underpin GenAI guidance, whereas terminological explanations are absent throughout the policy [26]. Consequently, ambiguous narratives inherent in policy terminologies require students to independently interpret these ambiguities, including inconsistent, vague, and absent definitions. Such ambiguities increase the likelihood that students will misinterpret guidance, and students themselves bear punitive consequences if they misinterpret or misapply GenAI guidance.

Table 6. Policy content on student utilising and declaring GenAI [18, 31, 34, 35]

University	Policy content (emphasis added)
Cambridge	'Any AI use in assessed work must be declared… Unacknowledged AI-generated content may be treated as academic misconduct'
IC	For declaration, students should include 'brief description (single sentence) of the way in which the tool was used'
LSE	3 positions on GenAI use in assessment Position 1: No authorized use of GenAI in assessment Position 2: Limited authorised use of GenAI in assessment Position 3: Full authorised use of GenAI in assessment

DOI: 10.54254/2753-7048/2026.37261

Table 6. (continued)

UCL	3 categories for GenAI use in assessment Category 1: GenAI tools cannot be used Category 2: GenAI in an assistive role Category 3: GenAI in an integral role Tasks like 'translating content' appear in both Category 2 and 3

5. Discussion

5.1. Responsibility transfer through three mechanisms

This analysis of the policy documents reveals the existence of responsibility transfer. Admittedly, the original aim of GenAI guidance is to clarify effective student use of GenAI in assessment without compromising academic integrity standards [36]. Nevertheless, current GenAI policies of the G5 universities may shift responsibility from institutions to students, requiring students to bear the interpretive load in navigating vague policy language within an increasingly complex and decentralised GenAI governance architecture.

The responsibility transfer consists of three mechanisms. Initially, policy proliferation provides the setting. The G5 universities enact materials on both supportive opportunities and punitive prescriptions, following the wider trend of balancing innovation and integrity [3, 37]. While proliferating policies progressively build an expanding governance architecture, this architecture is not necessarily accompanied by clarity, thus creating confusion for students [6]. Subsequently, fragmented layer-specific policies symbolise the occurrence of responsibility transfer. By distributing interpretive authority to local levels, the G5 universities may not construct a sufficiently clear sequence of which layer's guidance should be prioritised, consequently transferring the burden of reconciling potentially inconsistent institution-wide and discipline-specific guidelines onto students alone. Ultimately, responsibility transfer is visualised in ambiguous narratives, where terminology is inconsistently defined across materials, provided with indeterminate definitions, or left undefined. This finding echoes earlier observations on linguistic vagueness in higher education GenAI policies [9, 14]. Such ambiguities thus demonstrate precisely how responsibility transfer impacts students as they undertake assessments.

Considering these three mechanisms, responsibility transfer is situated in an expanding architecture constructed by proliferation, takes place through the decentralisation of interpretive authority in fragmentation, and is evidenced by textual ambiguities. Therefore, the G5 universities' materials suggest ostensible clarity but instead place interpretive load on students, who are held responsible for unclear guidelines and who face punitive consequences of GenAI misuse.

5.2. Theoretical and practical implications

This study adopts the concept of interpretive load and contributes to its theoretical exploration. Compared to earlier studies centring on students' non-compliance, interpretive load highlights a novel internal understanding of the GenAI governance dilemma that policies themselves may be essentially problematic [9, 38]. Specifically, this study weaves interpretive load into the process of responsibility transfer, suggesting how this transfer is achieved through three observed mechanisms and can produce interpretive load that substantially undermines policy clarity.

From a practical perspective, this study suggests that university governance on student GenAI use in assessment should concentrate more on providing pragmatic procedures and concrete examples in

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relevant guidelines and ensuring all policies are clearly communicated to students to avoid responsibility transfer. Additionally, assessment redesign should be promoted to align with rapid GenAI developments. Therefore, institutions should encourage practical policy formulation and subsequent implementation. Ultimately, higher education institutions should prioritise student needs through regularly negotiating with students on assessment instructions and allowing flexibility rather than keeping policies highly prescriptive and punitive.

5.3. Limitations and future research

Despite the contributions made in this study, it also acknowledges its limitations and suggests further research orientations. First, it focuses on textual documents and does not capture the perspectives of students who are directly affected by these policies; qualitative work, such as interviews and surveys, could explore whether and how students themselves experience regulatory guidelines as a source of interpretive load. Second, the corpus is confined to the UK's G5 universities, which, while exemplifying research-intensive institutions, cannot represent the sector as a whole. Broadening the sample to include, for instance, other Russell Group universities, and conducting comparative analyses on non-research-centred specialised colleges would strengthen the findings. Third, drawing solely on publicly available institution-wide materials entails two omissions: internal documents accessible only to enrolled students, which might clarify ambiguities in public policies, remain unexamined, as do the details of fragmented discipline-specific guidelines. Closer investigation of these is warranted. Finally, given the rapid pace of GenAI development and the resulting policy adaptations, this study is a time-bound snapshot and does not claim to be conclusive. Longitudinal research is needed to track how institutional policies change over time, and specifically whether the interpretive load placed on students persists, diminishes, or disappears.

6. Conclusion

Considering the current governance dilemma of GenAI in student assessment, focusing solely on students' negative usage and its impact may be insufficient. This study hence presents an internal examination of how institutional GenAI policies themselves can undermine prospective clarity and contribute to students' interpretive load. Drawing on a purposive sample of public policy materials enacted by the UK's G5 universities, this study has demonstrated three issues concerning policy proliferation, fragmentation and ambiguity. These observed themes function as mechanisms to jointly enable institutions to transfer interpretive responsibility to students, thus producing interpretive load that students must address before starting an assessment. Crucially, this exploration of how institutional regulations aiming for clarity may instead create interpretive load has theoretically expanded the relatively novel concept of interpretive load, provided valuable contributions to GenAI policymaking in UK higher education, and guided further research directions for this field.

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