

Using AI with *confidence*

A guide to the marking and feedback of summative
assessment in centres

Why this guidance matters

As AI tools become more accessible, many centres are exploring how they can support marking and feedback. This guide is here to help you use AI confidently and effectively – in ways that enhance your work and uphold the quality of assessment.



What this guide offers

It provides practical advice for teachers and centre leaders on integrating AI into marking processes for summative assessments. Our aim is to support you in using AI to reduce workload and improve efficiency, while maintaining high standards in teaching, learning and assessment.

This guidance applies to qualifications where centre staff mark learner work, with internal quality assurance and external oversight from City & Guilds. It complements qualification specifications, which must always be followed.

We've aligned this guidance with current advice from the Joint Council for Qualifications (JCQ), Office for Qualifications and Examinations Regulation (Ofqual), and Department for Education (DfE).

Our approach

We understand the challenges that centres and assessors face when it comes to marking and feedback workloads. AI has the potential to ease this burden – and we want to help you to make the most of it.

We support centres in adopting AI tools to assist with marking and feedback, and we believe in its potential to bring positive change across education. To help you get started, this guide sets out four key challenges to consider when introducing AI into assessment processes:

1. Accuracy and quality
2. Privacy
3. Transparency
4. Knowing your learners.

Each section lists a set of requirements that centres must follow when using AI assistance, alongside further examples of best practice, to get the most from AI while maintaining high standards.

1

Accuracy and quality



The challenge

The adoption of AI systems in the marking and feedback processes of centre-marked assessments could lead to a reduction in the accuracy of marking and the quality of feedback provided to learners.

The use of AI in marking and feedback raises important considerations around accuracy and quality. Ofqual's policy paper (2024) makes clear that AI must support – not replace – human judgement. Assessors remain fully accountable for the marks and feedback they give, even when using AI tools. Current generative AI models can produce errors, inconsistencies and biased outputs. For example, they may misinterpret the task or learner response, overlook parts of the mark scheme, or introduce gender and cultural bias from training data.

To ensure learners receive accurate marks and meaningful feedback, assessors must review all submissions in full and critically evaluate AI outputs for factual accuracy, bias and alignment with assessment criteria. While this may reduce some of the timesaving benefits, it ensures assessors retain control and uphold quality. In line with JCQ guidance (2025), AI can complement marking and feedback when used responsibly. City & Guilds will continue to monitor centre-marked assessments for accuracy, quality and IQA evidence – whether completed solely by humans or with AI support.



Requirements – centres *must*:

- ensure assessors are trained in the ethical and effective use of AI systems that support marking and IQA processes, with clear accountability for final marks and feedback
- provide guidance on resolving discrepancies between assessor judgement and AI output, including escalation routes
- ensure that centre-based assessors review each learner submission to confirm the accuracy and quality of AI-generated outputs
- monitor AI outputs for errors, bias and inconsistencies, using diverse datasets and regular audits
- have a managed service-level agreement in place where third-party software is used.



Best practice – centres *could*:

- document pre-testing of AI systems to show they produce accurate marks and high-quality feedback
- use AI tools that adapt based on assessor and IQA corrections.
- apply AI to support assessor and IQA work, such as identifying patterns that inform training
- standardise AI use across assessors through shared prompts, procedures and opportunities to build trust
- evidence continuous improvement and share learning to support staff development.



2

Privacy



The challenge

The adoption of AI systems in the marking and feedback processes of centre-marked assessments could lead to the leakage of learner, centre, and City & Guilds data, non-compliance with UK GDPR regulations, or breach of copyright law.

AI systems vary in how they process and store data, so centres must manage their use carefully to protect personal information and maintain the integrity of qualifications.

Some generative AI tools may use prompts and outputs to train their models. Even where this risk is controlled, processing learner data through AI may not comply with UK GDPR or could breach learners' (DfE 2025) and/or City & Guilds's copyright.

Despite these concerns, AI can support centres in managing large volumes of assessment efficiently. The following guidance will help ensure data privacy is upheld when using AI in marking and feedback.



Requirements – centres must:

- provide staff with access to AI systems that minimise the risk of data leakage involving City & Guilds, centre, or learner data
- provide staff training on safe AI use to prevent data leakage, including anonymising data, handling sensitive prompts, recognising threats and reporting breaches
- apply their data security protocols to AI marking and feedback software
- comply with UK GDPR regulations when using personal learner data, including:
 - a clear privacy statement covering the use of learner data in this way
 - transparent communication with learners and carers about AI use, benefits, risks and data rights
 - mechanisms to uphold GDPR protocols (such as responding to a data leak, the right to be forgotten, and the right of access)
- **not** use learners' original work to train AI models without permission from the learner and their carer, unless a copyright exception applies (DfE 2025)
- obtain consent from City & Guilds before allowing AI models to ingest City & Guilds intellectual property.

3

Transparency



The challenge

The adoption of AI systems in the marking and feedback processes of centre-marked assessments could lead to learners and carers losing sight of who is reviewing and appraising the work.

When AI is used in marking and feedback, learners and carers need clarity about who is reviewing the work and the balance of work being done between the assessor and the AI system. Transparency is essential to maintain public confidence and ensure assessment validity – both priorities for Ofqual (2024).

Learners should understand how AI is used at their centre, how fairness is ensured (Jisc 2024), and how to raise concerns if they believe AI has led to unfair outcomes (Ofsted 2024a). Clear communication also helps reassure stakeholders that AI supports, rather than replaces, human judgement.

Being open about AI use helps assessors verify outputs, supports City & Guilds's quality assurance, and builds trust. Centres can embed this transparency into assessment policies, learner communications, and City & Guilds interactions.



Requirements – centres *must*:

- clearly explain how AI is used in marking and IQA within the centre's assessment policy, including what is and isn't acceptable
- inform City & Guilds of any use of AI assistance during external quality assurance
- proactively and regularly communicate with learners and carers about the role of AI in marking and feedback, and how assessors remain accountable
- ensure learners can raise concerns or complaints if they believe AI has led to unfair outcomes.



Best practice – centres *could*:

- offer learners the option to opt in or out of AI-assisted marking, with clear records to support delivery staff
- include a statement of AI use in the marking and feedback record, showing how the assessor has verified outputs
- use AI tools that explain how outputs align with the mark scheme, helping assessors verify accuracy
- be transparent about how AI quality checks are carried out, including IQA processes and bias monitoring.



4

Knowing your learners



The challenge

The adoption of AI systems in the marking and feedback processes of centre-marked assessments could lead to a negative impact on staff and learner relationships.

Assessment plays a vital role in helping teachers understand their learners and guide their progress. Ofsted highlights that “leaders and teachers use assessment well” to check understanding, inform teaching, and support strong relationships (Ofsted 2024b).

Using AI to support marking and feedback can save time, but it must not weaken the connection between teachers and learners. The best teachers use assessment to understand learners’ strengths, needs and goals – insight often gained through regular marking and feedback.

AI-assisted marking is not the same as fully automated systems. When used well and clearly explained to learners and carers, it can support effective teaching and maintain strong relationships. The following guidance helps centres use AI in ways that preserve this essential connection.



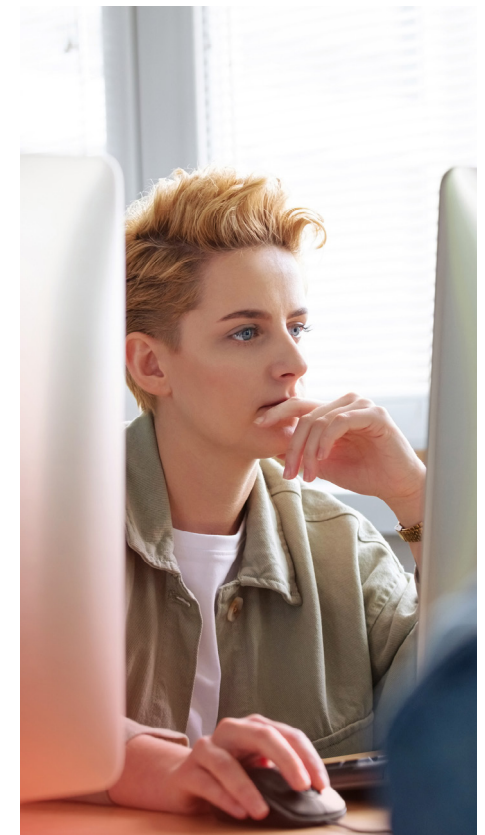
Requirements – centres *must*:

- monitor use of AI to ensure it does not negatively affect teacher–learner relationships
- train assessors on the pedagogical impact of AI-assisted marking
- clearly communicate with learners and carers that teachers remain accountable for all marking and feedback
- ensure AI-generated feedback is accessible to all learners, including those with additional needs
- regularly gather and act on feedback from teachers, learners and carers – especially for those with specific needs
- be transparent about the balance between human and AI input in marking and feedback.



Best practice – centres *could*:

- carry out an impact assessment to identify and mitigate any potential negative effects of AI use on learners.



References

DfE (2025) Policy Paper: Generative artificial intelligence (AI) in education. Available at: <https://www.gov.uk/government/publications/generative-artificial-intelligencein-education/generative-artificial-intelligence-ai-in-education>. Accessed 11/02/25.

Jisc (2024) Student perceptions of generative AI. Available at: <https://repository.jisc.ac.uk/9571/1/student-perceptions-of-generative-ai-report.pdf>. Accessed 13/04/2026

JCQ (2025) AI Use in Assessments: Protecting the Integrity of Qualifications. Available at: <https://www.jcq.org.uk/knowledge-hub/ai-use-in-assessments-your-role-in-protecting-the-integrity-of-qualifications/>. Accessed 20/05/25.

Ofsted (2024a) Ofsted's approach to artificial intelligence (AI). Available at: <https://www.gov.uk/government/publications/ofsteds-approach-to-ai>. Accessed 13/04/2026

Ofsted (2024b) Further Education and Skills Inspection handbook. Available at: <https://www.gov.uk/government/publications/further-education-and-skillsinspection-handbook-eif>. Accessed 01/11/24.

Ofqual (2024) Ofqual's approach to regulating the use of artificial intelligence in the qualifications sector. Available at: <https://www.gov.uk/government/publications/ofquals-approach-to-regulating-the-use-of-artificial-intelligence-in-thequalifications-sector>. Accessed 29/10/24.



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