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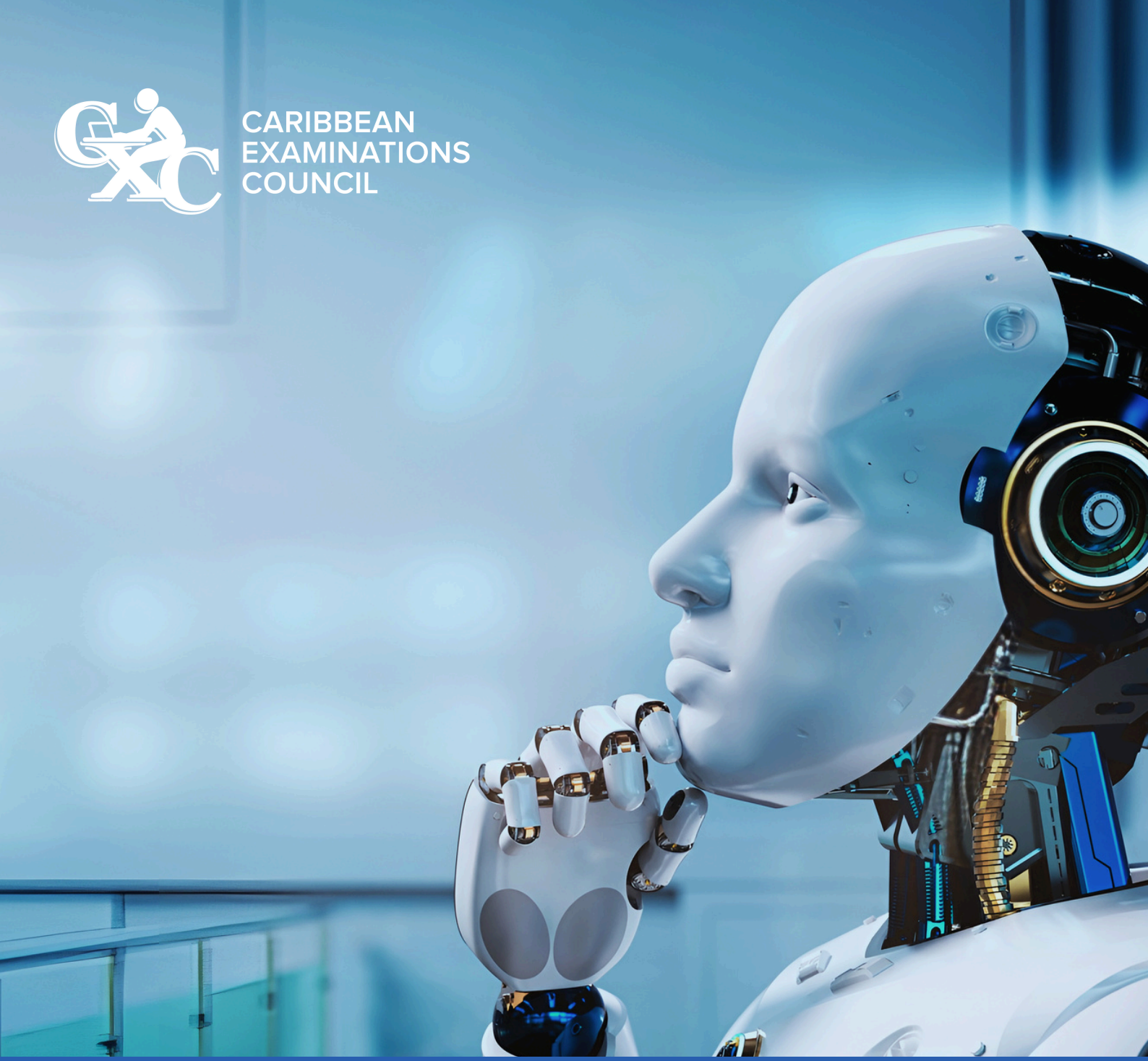

CXC© Responsible Generative Artificial Intelligence Policy Framework for the Regional Secondary Education System

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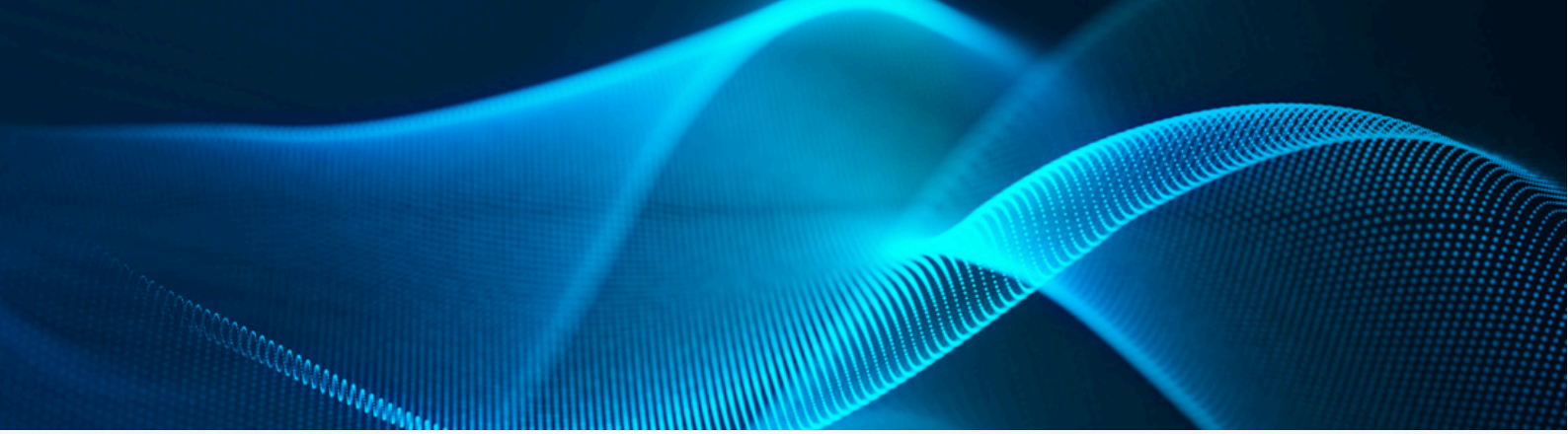
Contents

FOREWORD	1
ACKNOWLEDGEMENT	4
BACKGROUND	5
THE IMPACT OF ARTIFICIAL INTELLIGENCE	9
Teaching	9
Learning	9
Assessment	9
POLICY ADOPTION FRAMEWORK	12
A Responsible Generative AI Policy	12
Harmonisation of Policy and Data Structures	12
Configuration of AI Technology for Regional Context	12
Research AI Application within the Education System	12
Monitor Compliance and Incident Resolution	12
Policy Impact Evaluation on Educational System Outcomes	12
Policy Review and Revision	12
POLICY OBJECTIVES	13
RESPONSIBILITIES	15
Regional	15
National	15
POLICY STATEMENTS	17
Preserving Academic Integrity	17
Ethical and Inclusive AI Education	17
Curriculum Integration	18
Teacher Training and Professional Development	18
Fairness and Bias Mitigation	18
Data Privacy and Security	18
AI Infrastructure and Resources	18
Human Oversight/Involvement	19
Psychosocial Impact	19
Assessment	19
IMPLEMENTATION ARRANGEMENTS	25
Phase I: Policy Development	25
Phase II: Qualification & Assessment Management	25
Phase III: Monitoring and Implementation	25
CONCLUSION	26
REFERENCES	27



Foreword

In its 50th year as one of the most consequential institutions of the regional integration movement, the Caribbean Examinations Council stands in the vanguard of efforts to ensure that our beloved region is not left behind in the rapid proliferation of the technological marvels of the 5th Industrial Revolution.

The pace of the accelerating momentum of innovative technologies like [1]Artificial Intelligence (AI) on all aspects of life, work and learning has been astonishing, fraught with risks and opportunities.

The World Economic Forum Future of Jobs Report 2025 has projected that 41% of companies are likely to replace existing jobs with AI by 2030, identifying AI and Big Data skills as the #1 requirement for employers. In the face of these realities in the labour market, UNESCO proffered a compelling theme for International Day of Education (January 24, 2025): *AI and Education: Preserving Human Agency in a World of Automation*.

As an agile knowledge organisation, CXC® recognizes the need to future proof its operations and educational offerings in the context of this global milieu. CXC® will therefore continue to respond rapidly to the technological advancements by embracing new forms of work as an exemplary digital enterprise, meeting the needs of our many stakeholders through the full digitalisation of our qualifications and assessment systems, as well as the rollout of new generation technology and science programmes and a Generative AI Policy framework for the regional Secondary Education system.

[1] *AI is the catch-all phrase for software capable of performing tasks that usually require human intelligence with built-in algorithms that can adapt to and learn from mistakes. As an offshoot of the wider AI family, Generative AI specifically imitates creativity, generating text, images and even music, but with a controlled level of randomness embedded into its algorithms that allows it to see patterns in data that are purely inconsequential, and thus, with the potential for making mistakes.*

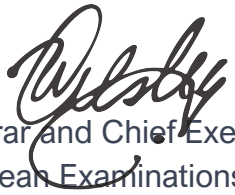
This CXC® Responsible Generative Artificial Intelligence Policy Framework for the Regional Secondary Education System seeks to capitalise on the opportunities to support our schools to make quantum leaps in improved education and learning outcomes. It lays out the strategic measures necessary to ensure its benefits are maximised while its risks are mitigated.

Approved by the CXC® Board of Governors at its Annual Meeting of Council on 6 December 2024, this policy framework offers a structured approach to the successful implementation of Generative AI in the learning and learning facilitation process in our secondary schools, which is scalable at the lower levels of the education system. We anticipate the enthusiastic embracing of this policy framework by the Ministries of Education, School Administrators, Teachers and Students, as we work towards the goal of equipping secondary schools in every Caribbean state with practical Generative AI Policies and Guidelines that will improve their respective school performance and student achievement.

The Caribbean region, with its unique challenges and opportunities, is well poised to harness the potential of AI to drive sustainable development and societal progress. CXC® is relying on its over four decades of partnership and collaboration with the region's Education establishment to make this initiative work in a sustainable way.

We are confident of these possibilities.

Wayne Wesley, PhD, CMgr



Registrar and Chief Executive Officer
Caribbean Examinations Council

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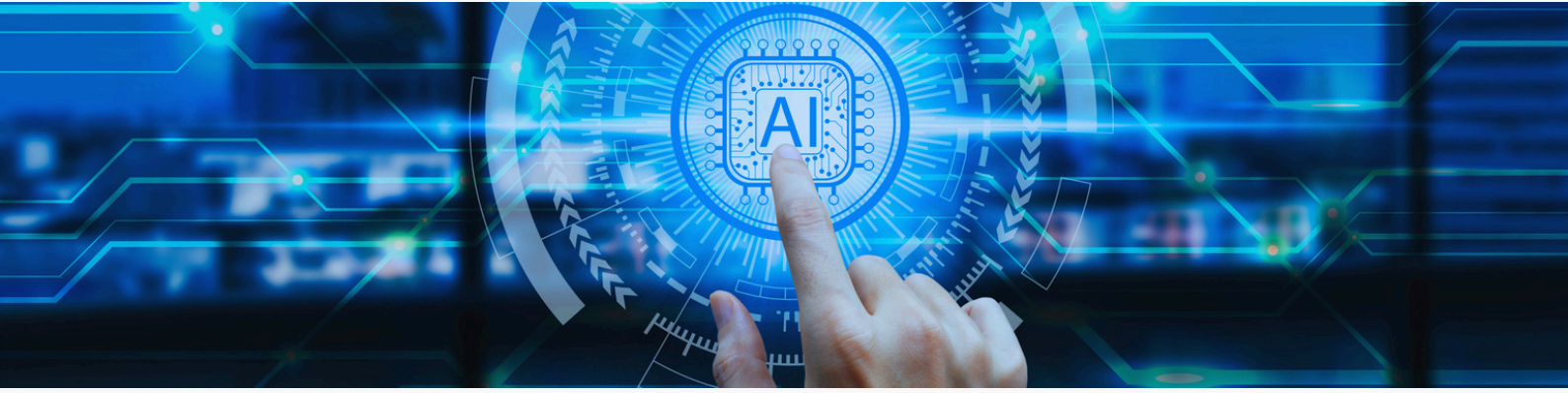
CARICOM Secretariat (HRD and ICT4D desks)
Caribbean Association for National Training Agencies (CANTA)
Caribbean Association of Principals of Secondary Schools (CAPSS)
CARICOM Council for Human and Social Development (COHSOD)
Caribbean Union of Teachers (CUT)
Commonwealth of Learning (COL)
Dr Ruth Baker-Gardner, Lecturer/Undergraduate Coordinator - Academic Integrity Expert, Department of Library and Information Studies, The University of the West Indies
Inter-American Development Bank (IADB)
Regional Ministers of Education and Permanent Secretaries
UNICEF



Background

In recent years, the proliferation of the application of Artificial Intelligence (AI) in various sectors, including Education, has created the need for responsible and structured approach to AI implementation.

According to the UNESCO Caribbean AI Policy Roadmap 2023[1], the Caribbean region holds promising opportunities to leverage AI for development across various sectors and needs to embrace these frontier technologies to stave off continued slow economic growth rates of 2.3% - 2.6% predicted for the region.

With Generative AI poised to raise global GDP by 7% in the next 10 years, AI could help the Caribbean overcome the challenges that continue to plague the region such as crime, poverty, and weak healthcare and education systems. The document further posits a definition for AI policy as public policies that maximise the benefits of AI, while minimising its potential costs and risks. In addition, it outlines a two-fold level of responsibility of governments as follows:

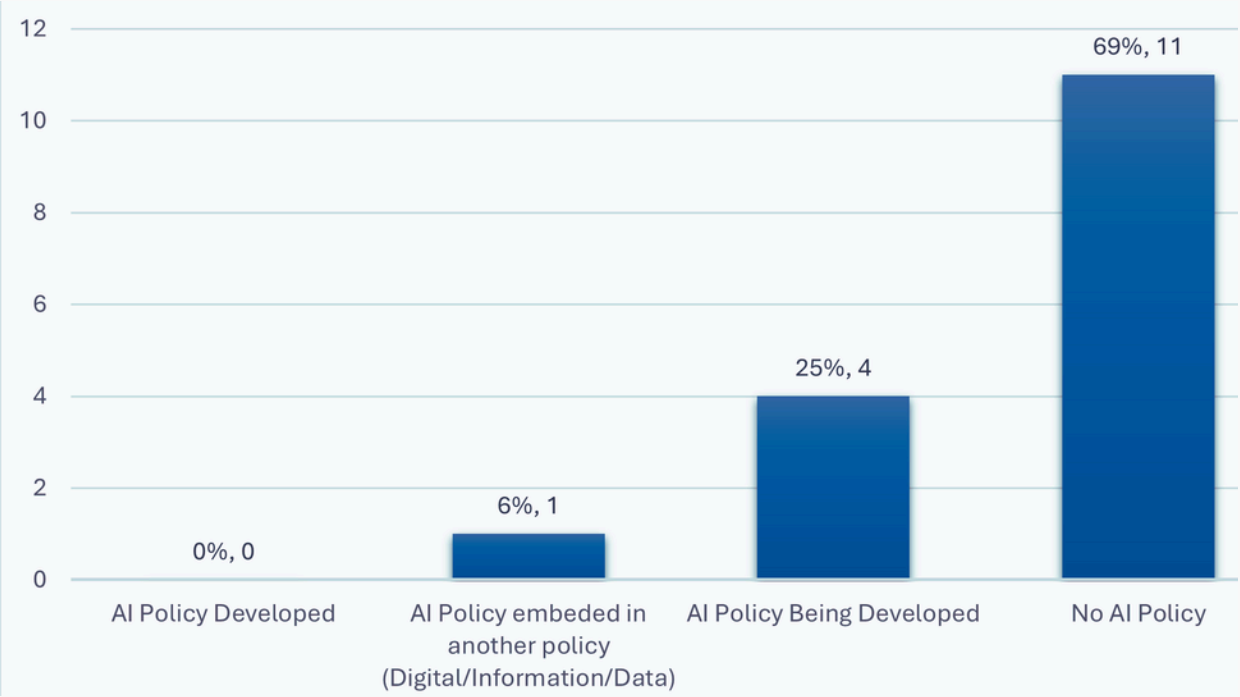
1. Governments should **invest** in the development and adoption of AI to secure its many benefits for the economy and society.
2. Governments need to also **respond** to the economic and societal challenges brought on by advances in AI.

While there are general policy frameworks available such as those developed by the UNESCO, ISO[2] and others, these are not specific to the various nuances expected at the respective levels of the Regional Education System, i.e., primary, secondary, and tertiary. Efforts have been made at the tertiary level, with the University of Guyana[3] developing and making available their AI in Education Policy. Other universities such as The University of the West Indies and The University of Trinidad and Tobago are currently working on the development of their AI policy. However, not much is being done at the primary or secondary levels.

The need for the policy was supported by the results of a survey conducted to ascertain the AI policy development status among 16 Ministries of Education across the Caribbean Region. Figure 1 summaries the responses obtained by the survey in November 2024.

According to the results, the Ministries are at varying levels of development with none (0%) having a developed AI Policies. Specifically, 6% of respondents (1 Ministry - Jamaica), indicated that their AI policy will be embedded in another policy for governing digital/information/data for the secondary school system. 25% of respondents (4 Ministries - Antigua and Barbuda, Belize, Guyana, and Trinidad and Tobago) indicated that their AI Policy is being developed while the majority 69% of respondents (11 Ministries) have not started the process of development. These Ministries include, Anguilla, Barbados, Cayman Islands, Dominica, Grenada, St Vincent and the Grenadines, St Lucia, The Virgin Islands (British), Kitts and Nevis, Montserrat, and Turks and Caicos Islands.

Figure 1: Responses obtained from a survey conducted to ascertain the AI policy development status among 16 Ministries of Education across the Caribbean Region.



Consequently, the **Caribbean Examinations Council (CXC®)** has authored the development a Regional Policy for Responsible Generative AI for the Secondary Education System to encourage and foster equitable and effective education. The policy is geared towards facilitating the creation of a regulatory framework to standardise the adoption of Generative AI within the secondary education system. In addition, it will provide a structure for the harmonisation of the teaching, learning, and assessment processes to cover capacity development and tooling, data governance, academic integrity, monitoring, and compliance.

CXC® will also implement its own AI operational policy to ensure conformity to what is being recommended to ministries of education. Further, while there are regional development priorities that may be considered using AI frameworks, the urgency of having a regional policy for the secondary education system cannot be underestimated or not addressed swiftly, particularly noting how students and teachers are using Generative AI in teaching, learning and assessment across the regional education ecosystem. It is important to note that while emphasis is being placed on the secondary education system, the general tenets of the policy will be applicable to the primary education system.

The Impact of Artificial Intelligence

Digital innovation, while not the panacea, has proven to be efficient and effective in alleviating many of the challenges that characterised the pre-pandemic systems of teaching, learning, and assessment. It is undeniable that perhaps the most acute evidence of the influence of digital innovation in Education is the impact of AI on teaching, learning, and assessment.

The impact of AI on teaching, learning, and assessment includes but is not limited to the following:

1. Teaching

(a) Redesign of qualifications and curricula to cover crucial principles and concepts.
(b) An additional source of content material.
(c) The need for teachers to keep abreast with technological developments.
(d) Facilitates dynamism in educational delivery approaches.
(e) A means of developing learners' analytical skills in performing. comparative and critical thinking assessments.

2. Learning

(a) The need to balance competencies with appropriate content coverage.
(b) Development of crucial competencies.
(c) Access to information not readily available.
(d) Facilitates independent enquiry and pre-class preparation.
(e) Facilitates the creation of adaptive personalized learning experiences.

3. Assessment

(a) Greater attentiveness to the appropriate use of formative and summative assessments strategies.
(b) Adherence to assessment principles in the recognition of competencies.
(c) Vigilance regarding the design of assignments.
(d) Requires discernment of learners' abilities by educators.
(e) Increased capability to generate related sample questions and responses.
(f) Enhances assessment preparation and associated components.
(g) Facilitates the creation of adaptive assessments for personalized evaluation.

Digitalised educational systems allow for the development of critical and complex competencies not possible with traditional manual or paper-based approaches. With the explosion of Generative AI (Gen AI), content knowledge has now become ubiquitous, hence the need for greater emphasis on the development of competencies – particularly higher-order competencies or cognitive abilities[4]– which drive creativity and innovation. Notwithstanding the positive impact of Gen AI, there are some concerns regarding the efficacy of its use.

These include, but are not limited to:

(i) access to information of varying quality;
(ii) the promulgation of disinformation;
(iii) AI governance issues;
(iv) negation of cognitive development;
(v) 'fear' of human replacement or obsolescence[5];
(vi) increase academic integrity issues;
(vii) failure to maintain, or absence of, current and relevant legal and regulatory frameworks to ensure appropriate use of Gen AI; and,
(viii) potential privacy invasion.

Therefore, as Gen AI is contemplated, it is crucial that safeguards are considered for academic integrity, intellectual laziness[6], and information verification/validation. AI can and should be embraced as a powerful educational resource while protecting the integrity of the teaching, learning, and assessment process.

Policy Adoption Framework

The UNESCO AI and Education guidance for policymakers[7] quoted from the work of Holmes et al., 2018b, 2019, stating that it is important to acknowledge at the outset that the use of AI for learning and assessment also raises various concerns that are yet to be properly addressed. These include concerns about their approach to pedagogy, the lack of robust evidence for their efficacy and potential impact on teachers' roles, and broader ethical questions. Therefore, it is important that the embrace and engagement of Gen AI in the regional secondary school system be established on the same construct as follows:

1. A Responsible Generative AI Policy – Human-centred development must be the anchor, allowing for capacity development of critical stakeholders such as administrators, teachers, and students. Crucial to this is to ensure students are literate and numerate to harness the benefits of AI.

2. Harmonisation of Policy and Data Structures – Crucial for comparative research and evaluation.

3. Configuration of AI Technology for Regional Context – Content must be culturally relevant and, as far as possible, minimise bias.

4. Research AI Application within the Education System – Adopt an investigative/ research posture to ascertain evidence-based information for optimal policy decision-making regarding appropriate interventions for full adaptation.

5. Monitor Compliance and Incident Resolution – Adopt a learning and risk mitigation approach through a robust quality management system with checks and balance guided by best practices with appropriate disaster recovery and optimisation systems across the region.

6. Policy Impact Evaluation on Educational System Outcomes - An assessment of the long-term consequences of the adaptation of AI and its effectiveness on the teaching, learning, and assessment process.

7. Policy Review and Revision – AI Technology is rapidly changing and requires that AI policies be kept abreast of the new developments to ensure adequate governance oversight and control and maintaining policy relevance and currency.

Policy Objectives

CXC® recommends that the aim of such a policy should be to strengthen the governance oversight to harness the benefits of AI across the region by establishing a standardised framework to:

1. enhance the teaching, learning and assessment process in creating a modernised and engaging development experience (Cognitive, Social, and Cultural);

2. guide the prudent adaptation of AI for appropriate and relevant interventions;

3. increase the efficiency and effectiveness of the regional secondary education system to support improved performance outcomes; and,

4. provide a basis for the prioritisation of financial investment for infrastructure and capacity development.

Responsibilities

CXC® recommends that in establishing a policy framework in AI for the regional secondary education system, several policy actors should be duly considered as they are to be impacted by the policy. They are:

1. Regional

(a) The Council of Human and Social Development Education who are to ensure harmonisation of the regional AI policies at the tertiary, secondary, and primary levels of the education system.

(b) The Caribbean Examinations Council is an executing body for implementing the secondary education AI governance framework and deploying or administering AI tools in qualifications and assessments. In addition, provide capacity building in rudiments of AI tools and academic integrity vigilance.

(c) The Caribbean Association of Principals of Secondary Schools (CAPSS) is crucial in cultivating an enabling environment that is conducive to the adoption of AI.

(d) The Caribbean Union of Teachers (CUT) is positioned to support and advocate for the constructive and ethical adoption of AI tools by teachers and their national unions across the educational system in the region.

(e) The University of the West Indies to accept and embrace AI at the tertiary level and develop educational professionals in the responsible adoption of AI in secondary education.

2. National

(a) The Ministries of Education to endorse and introduce national policy/regulations, as well as providing resources for AI adoption in the educational system and in schools to support curriculum design, teaching, learning, and assessment practices.

(b) The National Committees of CXC® to advocate and support the ethical adoption of AI in the respective countries' educational system.

(c) The National Assessment, Accreditation and Training Authorities/Agencies to value and promote the ethical use of AI in education at the secondary school level.

(d) National universities, teachers' colleges, community colleges and vocational institutes to accept and embrace AI at the post-secondary and tertiary levels, and train teachers and administrators in education programmes in the responsible adoption of AI in secondary education.

Policy Statements

Consistent with UNESCO's AI competencies for both teachers[8] and students[9], the key principles and considerations[10] that should be incorporated in this regional AI policy for the secondary education system includes:

1. Preserving Academic Integrity

CXC® notes that academic integrity is a concern for users of AI and so it is important for preservation within the regional education ecosystem. Academic integrity[11] refers to the ethical principles and values that guide students, researchers, and scholars in their academic work, ensuring that their actions and outputs are honest, trustworthy, and respectful of others' intellectual property. Maintaining academic integrity[12] involves considering the following factors:

(a) Honesty – Be truthful and transparent in their work, acknowledging sources and avoiding deception.

(b) Originality – Produce original work, avoiding plagiarism and properly citing others' ideas. This does not relate to teaching and learning activities in preparation for examinations but to ALL work submitted for assessment and determination of the award of a grade or recognition of competence.

(c) Respect – Recognise and respect the intellectual property rights of others.

(d) Responsibility – Taking ownership of one's personal actions and the consequences.

(e) Fairness – Treat others fairly and equally, avoiding unfair advantages.

(f) Trustworthiness – Maintain confidentiality and handle sensitive information with care.

(g) Accountability – Be answerable for one's personal actions and the impact on the academic community.

2. Ethical and Inclusive AI Education

(a) Equity – Distributive efficiency to ensure that AI education reaches all students, regardless of socioeconomic background or location.

(b) Inclusivity – Address the digital divide by providing access to AI tools and training for marginalised communities.

(c) Ethics – Teach and guide students about AI ethics, academic integrity, bias, and responsible use.

3. Curriculum Integration

(a) Teaching

(i) AI Literacy – Integrate AI concepts into existing subjects.
(ii) Clear indication of AI-generated content in course materials.
(iii) AI-generated work is properly cited and referenced.
(iv) Use AI to augment, not replace, human instruction.

(b) Learning

(i) Literacy and Numeracy – Targeted interventions to ensure the acquisition of foundational competencies to communicate and calculate.
(ii) Use AI-generated resources as supplements, not replacements, for human learning.
(iii) Develop critical thinking skills to evaluate AI-generated content.

4. Teacher Training and Professional Development

(a) Capacity Building – Education and training of teachers on incorporating AI tools into their teaching methods, and academic integrity vigilance.

(b) Pedagogical Approaches – Equip educators with strategies for integrating AI effectively.

5. Fairness and Bias Mitigation

(a) Awareness of and address biases to prevent discriminatory outcomes.

6. Data Privacy and Security

(a) Student Data – Establish guidelines for collecting, storing, and using student data in AI applications in line with the relevant national legal and regulatory frameworks.

(b) Consent – Ensure informed consent from parents/guardians for AI-related activities involving students' data.

7. AI Infrastructure and Resources

(a) Hardware and Software – Invest in AI infrastructure (computers, software, and other digital devices).

(b) Utilities Infrastructure – Account for adequate internet connectivity and energy consumption requirements.

(c) Device equity – Ensuring that suitable devices are available to all communities.

8. Human Oversight/Involvement

(a) Teacher Supervision – Teachers should guide AI activities and interpret results.

(b) Explainability – Ensure AI decisions are understandable to educators and students.

(c) Validation/Verification – Use human evaluation and oversight to validate/verify AI-generated content for decision-making on assessment outcomes.

(d) Performance Judgement – Ensure that students' performance is moderated by teachers and that mark schemes and allocation mechanisms are quality assured.

9. Psychosocial Impact

(a) Context – AI support systems are shaped by the data that were used to train them. Given the historical digital divide, care must be taken to ensure that the use of technologies reflects the regional and national social, cultural, and behavioural context.

(b) Interface – The adoption of generative AI shall not reduce the humanity of our education system and will not substitute for the teacher-student-parent interaction that is required for holistic development of the Caribbean citizen.

(c) Impact – Ensure the wellbeing of our society, guarding all stakeholders from unintended impacts of the application of AI.

Assessment

Adherence to the principles of assessment is of utmost importance in the design and grading of assignments within the era of AI, which necessitates a new assessment construct that emphasises continuous feedback and the learner's process, effort, and engagement with the assignment. The principles of validity, fairness, reliability and equivalence are key in the assessment process. Validity ensures that the skills and content to be measured are clearly defined and the instruments developed are the ones best suited to measure these clearly defined skills and content as outlined in the syllabus or any document with specified course of study.

Fairness ensures that the assessment process used does not create an advantage or disadvantage to the learner. Reliability ensures that the assessment has the level of consistency required. Equivalence is ensured by adhering to the content and assessment guidelines in a given syllabus or related standard.

The new paradigm, which allows for students to use AI to complete assignments requires a shift in focus from the assessment of final product only to the overall growth and development of the learner. Consequently, essential is the maintenance of the regular, formative assessments that give students ongoing feedback and support throughout the learning process, helping them to improve and learn continuously, as well as the use of summative assessments. This requires a greater focus on the assessment construct that should be utilised to validate learners' competence, encourage authentic learning and minimise AI's impact on assessment integrity.

The Key Principles for Adherence

(a) **Assignment Design:**

Assessments must encourage learners to think critically, analyse information, and articulate their thoughts in a detailed manner. To ensure that students demonstrate their competence rather than their ability to use AI, assessment design should emphasise human skills as follows:

(i) Creativity and originality.
(ii) Critical thinking and analysis
(iii) Communication and collaboration.
(iv) Emotional intelligence and empathy.
(v) Ethical reasoning and decision-making.
(vi) Discernment of ambiguity, uncertainty, or conflicting information.

(b) **Assessment Development**

Based on the foundation of accepted assessment principles, the approach to the design of assessments and assignments should ensure originality and academic integrity in Assessment

(i) Authentic Assessment – Design assessments that mirror real-world scenarios such as case studies, presentations, and portfolios, requiring students to apply critical thinking, problem-solving, and creativity.
(ii) Continuous Assessment – designed to facilitate assessment for learning and assessment as learning as students are encouraged to be engaged in enquiry-based learning.
(iii) Written Assessments – Encourage nuanced responses, making it harder for AI to provide canned responses. Design assignments that require students to analyse, evaluate, and create rather that just recall information.
(iv) Performance-based assessments – Combine multiple skills, such as research, analysis, and presentation. Encourage students to work on projects that solve real world problems, fostering creativity and practical application of knowledge.

(v) Collaborative work – Foster teamwork, discussion, and peer review. Implement peer review systems where students assess each other's work, promoting collaborative learning and critical evaluation skills.

(vi) Reflective components – Promoting self-awareness and responsibility by asking students to justify their thought process, decisions, and outcomes.

(vii) The utilisation of the CXC® Regulations to enforce the maintenance of academic integrity principles in Assessment.

(viii) The enhancement and improved management of academic integrity in assessment at the Secondary and post-secondary levels.

(c) **Standards and Guidelines for the Use of AI in Assessment**

The development of standards and guidelines to manage the use of AI in assessment will include but not limited to:

(i) The adoption of an appropriate Assessment Structure to guide the use of AI in Assessment.[13]

(ii) The accepted utilisation of different types of assessments to form the best judgement about learners' assignments in line with principles 1 and 2 above the adherence to quality system requirements to facilitate the maintenance of assessment principles and appropriate related decisions on learners' competence.

(d) **The development and maintenance of current and relevant legal and regulatory framework to manage appropriate use of Gen AI in CXC®'s Assessment Process.**

This framework will include the requirements of:

(i) candidates in the completion and submission of all assessment components; and,

(ii) stakeholders in the administration, marking and grading of all assessment components

10. Assessment Facilitation for Exceptionalities

AI presents tremendous possibilities to create more equitable and inclusive assessment processes that empower individuals with exceptionalities (physical impairment or Special Education Needs) to reach their full potential.

(a) Appropriate and relevant Assessment

(i) Tailored Assessments – AI can adapt assessments to the specific needs and abilities of everyone, ensuring fairness and accuracy.

(ii) Flexible Formats – AI can offer a variety of assessment formats, such as audio, visual, or tactile, to accommodate different learning styles and sensory needs.

(iii) Dynamic Difficulty Adjustment – AI can adjust the difficulty level of assessments in real-time, ensuring that individuals are challenged but not overwhelmed.

(b) Improved Accessibility

(i) Accessibility Features – Harness the power of AI to incorporate accessibility features like screen readers, speech-to-text, and text-to-speech, making assessments more inclusive for individuals with visual or auditory impairments.

(ii) Alternative Input Methods - Harness the power of AI to enable individuals to use alternative input methods, such as eye tracking or voice commands, to complete assessments.

(iii) Universal Design for Learning - Harness the power of AI to help create assessments that are accessible to all learners, regardless of their abilities or disabilities.

Implementation Arrangements

CXC®, as the primary agency, will work with ministries of education and other regional and national stakeholders across the regional secondary education system, to facilitate the requisite managed engagements, discourses, and project-based implementation arrangements with Member States and Associate Member States of CARICOM. This may take place in three phases:

Phase I: Policy Development

CXC® proposes to work directly with CARICOM-COSHOD, Member and Associate Member States of CARICOM through their ministries of education as the country focal point to ensure that requisite national education policies or sector plans are articulated with the regional framework for AI in secondary education and are harmonised with CXC's policy architecture.

Phase II: Qualification & Assessment Management

As **CXC®** continues its managed implementation of secondary-level education qualifications offerings with respect to lower and upper secondary schools, it will ensure that **CXC®** planned and budgeted AI tools be incorporated in syllabus and assessment development and implementation.

Phase III: Monitoring and Implementation

As **CXC®** rolls out its qualifications and assessments across Member States and Associated Member States of CARICOM, monitoring of the implementation of AI applications against the principles and standards will be carried out to ensure ethically adopted and quality use of AI in curricula design, teaching, learning, and assessment.

Conclusion

The overall aim of the development of this policy is to harness the potential of generative AI while ensuring its responsible use in teaching, learning, and assessment. Cognisant of the reality that as the technology evolves, so does its impact on education. Also, while it has the potential to enhance the learning experiences, it also raises important questions about ethics, privacy, and fairness. Consequently, this policy is committed to fostering an environment of strong governance, academic excellence, honesty, and integrity. In addition, the policy will outline guidelines for the ethical and effective utilisation of responsible generative AI in the regional secondary education system.

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