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Enacting generative AI policy in english further education colleges: tensions between national ambitions and institutional realities in vocational education and training (2023–2025)

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ABSTRACT

This paper critically examines how national policies promoting generative artificial intelligence (GenAI) are enacted within English Further Education (FE) colleges between 2023 and 2025, with a focus on vocational and technical education. Drawing on documentary analysis of national policy, regulatory texts and institutional materials, the study is informed by policy enactment theory and a social justice lens. The study identifies a persistent gap between ambitious national discourse (emphasising personalised learning, workload reduction and workforce preparation) and uneven institutional practices. Documentary sources on a small number of early-adopting FE colleges indicate benefits such as administrative time savings and enhanced feedback processes, but significant barriers remain, including limited access to professional development, concerns regarding assessment malpractice and unequal institutional capacity. Critical scholarship suggests that failure to enact technology with substantive policy, institutional and practitioner guidance can accentuate existing inequities, particularly in rural or under-resourced contexts. The paper supports arguments that GenAI, frequently framed as a democratising innovation in vocational education, may instead intensify structural divides without equity-oriented policy support, and concludes by proposing clearer regulatory guidance, capacity-building measures and differentiated funding as conditions for more just and sustainable GenAI integration in the FE sector.

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Generative AI; policy enactment; Further Education; vocational education and training; equity

Introduction

The rapid advancement of generative artificial intelligence (GenAI) has generated significant policy interest in its potential to reshape education systems and prepare learners for an increasingly AI-mediated economy. In

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England, this interest has been articulated through a developing body of guidance and regulatory commentary rather than a single, unified policy instrument. Key contributions include the Department for Education's guidance on generative artificial intelligence in education (DfE 2023, updated 2024), Ofqual's regulatory position on the use of artificial intelligence in qualifications (Ofqual 2024), and broader skills strategies emphasising digital and AI-related competencies within vocational pathways (DfE 2023; Skills England 2025a, 2025b). Collectively, these texts position GenAI as a means of supporting personalised learning, reducing teacher workload, and enhancing workforce readiness.

These policy ambitions align with wider reform agendas in post-compulsory education, including the Lifelong Learning Entitlement and the increasing integration of digital competencies into apprenticeship standards and occupational frameworks. However, despite the prominence of GenAI within national discourse, there remains limited empirical and analytical attention to how such ambitions are interpreted and enacted within Further Education (FE) colleges. This sector delivers the majority of vocational and technical education in England and FE colleges serve a diverse learner population, including a high proportion of adult learners, working-class students, and individuals with prior experiences of educational disadvantage, making the sector a critical site for examining the equity implications of emerging education technologies. Existing research on GenAI in education has focused predominantly on higher education, addressing issues such as academic integrity, assessment design, and feedback practices in universities (Bearman et al. 2024; Cotton, Cotton, and Shipway 2023), while comparatively little attention has been paid to vocational contexts, despite their distinctive pedagogical models, assessment regimes, and resource constraints. Empirical research on GenAI in vocational education remains limited. Scott and Dwight's (2025) survey of 60 vocational educators in England is one of the first studies to document how GPT-based tools are being used to support workload and teaching practice in vocational education (VE).

The paper addresses the following research questions:

- What ambitions for GenAI are articulated in English national education and skills policy documents between 2023 and 2025?
- How are FE colleges enacting these ambitions in practice?
- What tensions and equity implications emerge from gaps between policy discourse and institutional enactment in vocational education?

This paper makes three interrelated contributions to debates in vocational education and training. First, it mobilises policy enactment theory into the emerging field of generative AI in English further education,

conceptualising GenAI as a specific form of digital capital whose distribution is uneven across FE institutions and learner groups. Second, through a qualitative documentary analysis of national policy, regulatory texts and institutional documents produced between 2023 and 2025, it identifies key mechanisms through which gaps between ambitious national discourse and constrained institutional practices generate new enactment tensions in vocational curricula and assessment. Third, the paper advances an equity-oriented policy agenda for FE in England, outlining conditions under which GenAI might support rather than undermine social justice goals in vocational and technical education.

Literature review

This section reviews the literature relevant to the study across four interconnected strands. It first conceptualises GenAI in educational contexts, distinguishing it from earlier forms of educational AI. It then examines how GenAI is constructed within educational policy discourses, with particular attention to vocational education and training (VET). The section subsequently draws on policy enactment theory to explore how national policies are interpreted and enacted within FE contexts, before addressing issues of equity, digital capital, and inequality that frame the study's analytical lens.

Conceptualising generative artificial intelligence in education

The rapid emergence of GenAI has generated renewed conceptual and theoretical debate within educational research. While artificial intelligence has been present in educational systems for several decades (most notably through learning analytics, intelligent tutoring systems, and adaptive learning platforms), recent developments in large language models (LLMs) mark a qualitative shift in how AI interacts with teaching and learning processes (Holmes, Bialik, and Fadel 2019; Luckin et al. 2016). Generative artificial intelligence refers to systems capable of producing novel outputs such as text, code, images, audio, and multimodal content, typically through probabilistic modelling trained on large scale datasets. Tools such as ChatGPT exemplify this shift, as they move beyond classification or prediction to actively generating content that can resemble human reasoning and communication (Floridi et al. 2018; Williamson and Eynon 2020). This capacity distinguishes GenAI from earlier forms of educational AI, which primarily functioned as decision support or management tools rather than co-constructors of knowledge.

In educational contexts, it is therefore analytically important to distinguish between artificial intelligence in education (AIED) and generative artificial intelligence. Traditional AIED research has focused on systems

that personalise learning pathways, automate assessment, or support monitoring and evaluation (Holmes, Bialik, and Fadel 2019). By contrast, GenAI directly intervenes in epistemic practices such as writing, problem solving, feedback generation, and knowledge representation (UNESCO 2023). As Bearman et al. (2024) argue, this shift destabilises established assumptions about authorship, assessment validity, and learner agency, particularly in high stakes educational environments.

Recent literature conceptualises the educational implications of GenAI across multiple analytical levels (e.g. Kasneci et al. 2023; Zhang and Wang 2024). At the micro level, research examines learner-AI interaction, including the use of GenAI as a learning companion, feedback generator, or scaffold for self-regulated learning (Kasneci et al. 2023). At the meso level, attention turns to institutional practices, including curriculum design, assessment regulation, and staff professional development. At the macro level, GenAI is framed within national skills strategies, labour market policies, and broader political economic agendas concerned with productivity and workforce transformation (Williamson and Eynon 2020). This study primarily engages with the meso and macro levels, focusing on how GenAI is conceptualised and enacted within vocational and technical education institutions.

Within VET, where questions of assessment credibility, occupational standards and employer trust are central, these dynamics are especially salient. Existing research highlights how innovation in VET is frequently mediated by regulatory and accountability frameworks, shaping how new technologies are interpreted and integrated into practice (Ecclestone 2018; Torrance 2017)

Conceptualising GenAI in education therefore requires moving beyond technical definitions towards an analysis of its social, institutional, and political dimensions. Rather than assuming that GenAI is inherently democratising, this study approaches it as a contested form of educational innovation whose effects depend on how it is governed, resourced, and enacted. This conceptual framing provides the foundation for the subsequent analysis of how national GenAI policies are articulated and enacted within English Further Education colleges, and with what implications for equity in vocational education.

Generative artificial intelligence and educational policy discourses

Building on the conceptual framing of GenAI introduced above, this section shifts the analytical focus from what generative artificial intelligence is to how it is discursively constructed within educational policy texts.

The rapid diffusion of GenAI has intensified global policy debates concerning the future of education, skills formation, and workforce

preparedness. Within contemporary policy discourse, GenAI is framed as a strategic technology capable of reshaping learning systems by personalising instruction, automating routine educational tasks, and enhancing productivity across institutions. Education, in this context, becomes not merely a site of technological adoption, but a central mechanism for equipping learners to participate in AI-enabled labour markets and knowledge economies. Critical scholarship on education policy and technology, however, cautions that such narratives are frequently underpinned by forms of technological solutionism, whereby complex pedagogical, institutional, and social challenges are regarded as problems amenable to technical fixes (Selwyn 2016; Williamson and Eynon 2020). In GenAI-related policy texts, optimism is often reinforced by claims that these technologies can simultaneously address persistent concerns such as teacher workload, learner disengagement, and skills mismatches (DfE 2023, updated 2024). As a result, GenAI is commonly presented as a scalable, neutral, and efficiency-enhancing intervention. Research on education policy processes consistently demonstrates, however, that policy technologies do not enter educational systems as stable or uniform solutions. Rather, they are discursively constructed, interpreted, and reshaped within existing institutional arrangements, professional norms, and accountability regimes (Ball, Maguire, and Braun 2012; Hardy and Lingard 2018). Policy discourses surrounding educational technologies often promise transformation at scale, yet their realisation is contingent upon local capacity, resourcing, and organisational mediation. Consequently, the effects of digital policy initiatives tend to be uneven, producing differentiated patterns of adoption and impact across institutions and learner groups.

The emerging literature on GenAI in education has, to date, focused on higher education contexts. Recent studies have explored issues including academic integrity, assessment redesign, and the pedagogical use of GenAI tools to support feedback and personalised learning in universities (Bearman et al. 2024; Cotton, Cotton, and Shipway 2023). While this body of work offers important insights into the risks and opportunities associated with GenAI, it provides limited analytical purchase for understanding vocational and technical education contexts, where pedagogical models, assessment practices, and institutional constraints differ substantially. VET occupies a distinctive position within education policy discourses due to its close alignment with occupational standards, applied learning, and employer engagement. Scholars have long argued that VET systems are particularly sensitive to shifts in skills policy, economic restructuring, and technological change (Billett 2011; Wheelahan 2015), while dense regulatory oversight renders vocational education especially sensitive to policy signals concerning risk, accountability and assessment credibility. Recent policy developments in England reflect these tensions. National strategies

increasingly position GenAI as central to the development of an ‘AI-ready workforce’ and to national productivity and growth agendas, implicitly framing vocational education as a key delivery mechanism for these ambitions. At the same time, regulatory discourses emphasise caution, particularly in relation to assessment validity, malpractice, and the ethical use of AI-enabled tools. This dual framing (simultaneously promotional and restrictive) creates ambiguity for institutions tasked with policy enactment. Existing research suggests that such ambiguity often results in conservative institutional responses, in which risk management and regulatory compliance take precedence over pedagogical experimentation, especially within high-stakes vocational assessment environments (Bearman et al. 2024; Torrance 2017). In vocational contexts characterised by high stakes assessment and external accountability, the framing of GenAI within policy discourse therefore plays a critical role in shaping how far institutions perceive innovation to be legitimate or permissible.

Despite growing policy attention, there remains limited research examining how GenAI policy discourses are interpreted within FE colleges in England. Given the central role of FE institutions in vocational skills formation, and their distinctive structural and regulatory conditions, this constitutes a significant gap in the literature. Addressing this gap requires moving beyond policy intentions to examine how discursive constructions of GenAI are translated, mediated or constrained within institutional settings

By situating GenAI within the literature on educational policy discourses and vocational education, this study responds directly to this gap, providing a critical analysis of how national ambitions are translated, or disrupted, within the everyday realities of FE colleges.

Policy enactment in further education and vocational contexts

Research on education policy consistently demonstrates that policy processes do not operate in linear or deterministic ways (Cavers 2018; Liu and Hardy 2023). Rather than being implemented as intended by policymakers, policies are interpreted, negotiated, and enacted within complex institutional settings shaped by material resources, organisational cultures, and professional values. Ball, Maguire, and Braun’s (2012) policy enactment framework conceptualises policy as a dynamic process in which texts are translated into practice through the situated actions of actors operating within specific contexts. This perspective has been particularly influential in understanding why policy reforms frequently produce uneven outcomes across educational institutions.

Within VET, policy enactment is further complicated by the sector’s hybrid positioning between education, labour markets, and regulation. FE

colleges in England operate under multiple, and sometimes conflicting, policy pressures: they are expected to deliver high quality teaching, meet regulatory requirements, respond to local employer needs, and contribute to national economic strategies. Scholars have shown that this multiplicity of demands often leads to selective or strategic enactment, where institutions prioritise compliance and risk management over innovation, particularly in contexts of limited funding and heightened accountability (Avis 2016; Hodgson and Spours 2014). Empirical studies of FE reform highlight how structural constraints shape institutional responses to policy change. Chronic underfunding, high teaching workloads, and staff shortages are persistent features of the English FE sector, limiting organisational capacity for sustained pedagogical innovation (Keep 2018). In such contexts, new policy initiatives (particularly those requiring investment in professional development or digital infrastructure) are often layered onto existing practices rather than embedded in transformative ways. This results in what has been described as ‘surface compliance’, where policies are acknowledged rhetorically but enacted minimally in practice (Arshad and Riddell 2011).

Assessment regimes play a particularly significant role in shaping policy enactment within vocational education. VET qualifications are closely tied to external regulation, awarding bodies, and employer trust, making assessment integrity a central concern for FE institutions. For instance, awarding bodies such as City & Guilds set detailed examination and malpractice regulations for centres, reinforcing highly standardised and tightly controlled assessment processes, designed to protect the perceived fairness and defensibility of results (City & Guilds 2025). Research indicates that when innovations are perceived to threaten the credibility of assessment outcomes, colleges tend to adopt precautionary approaches that constrain experimentation (Ecclestone 2018; Torrance 2017).

Leadership and organisational mediation are critical in determining how policies are enacted. Studies of FE leadership suggest that middle managers and senior leaders translate national directives into locally acceptable practices (Gleeson, Davies, and Wheeler 2015), understood as policy brokering. Where leaders possess the time, expertise, and strategic vision to support innovation, policies are more likely to be enacted substantively. Conversely, in colleges experiencing financial instability or inspection pressure, enactment tends to be risk-averse and tightly controlled. This helps explain why early adopters of digital innovation often emerge in better resourced institutions with stronger leadership capacity.

Recent scholarship on digitalisation in FE reinforces these patterns. Research on technology adoption in vocational settings shows that initiatives are often driven by individual enthusiasts rather than institutional strategies (Fawns, Aitken, and Jones 2021; Selwyn 2022). While such ‘AI champions’ can catalyse innovation, reliance on individual agency can

exacerbate inequalities between institutions, as access to expertise remains uneven. Without coherent frameworks and sustained investment, digital innovation risks remaining fragmented.

Taken together, this literature suggests that the enactment of GenAI policy in FE colleges cannot be understood simply by analysing policy texts or technological affordances. Instead, it must be examined through the interplay of regulatory environments, institutional capacity, leadership mediation, and professional practice. Policy enactment theory provides a lens for analysing how national ambitions are reshaped by local conditions and how gaps emerge between policy rhetoric and institutional realities. This research highlights GenAI not as a standalone intervention, but as a policy object interacting with structural challenges in vocational education. Understanding these processes is essential for assessing the practical and equity implications of GenAI integration within the FE sector.

Equity, digital capital, and inequality in vocational education

Questions of equity have long been central to debates about VET, particularly in systems such as England's where vocational pathways have historically been positioned as lower status alternatives to academic routes. Research consistently shows that FE colleges disproportionately serve learners from working-class backgrounds, adult returners to education, and those with prior experiences of educational disadvantage (Bathmaker 2017; Hodgson and Spours 2014). As a result, policy reforms introduced into the FE sector have significant implications for social mobility, participation, and distributive justice.

Critical sociological perspectives emphasise that educational reforms do not operate on a level playing field. More recently, the concept of digital capital has been used to capture inequalities in access to digital technologies, skills, and institutional support that shape learners' capacity to benefit from educational innovation (Selwyn 2022). Moreover, Ragnedda and Ruii (2020) have pointed towards digital capital as people being competent with digital resources in order to negotiate the digital economy. The same authors point to frameworks to enable policy that can tackle the digital divide that exists between those with access, hardware and knowledge (digital capital) and those who lack it.

In this paper, digital capital is conceptualised as an antecedent condition rather than an outcome of GenAI engagement. Digital capital refers to the accumulation of digital competencies, access to technological resources, and digitally mediated social practices that individuals can mobilise to generate advantage. We employ the concept both descriptively, to acknowledge unequal distributions of digital resources among young people, and explanatorily, as a mechanism through which

differential engagement with GenAI may be understood. Students entering AI-mediated educational environments with lower levels of digital capital may face barriers to effective use, critical evaluation, and strategic deployment of GenAI tools, thereby risking the amplification of existing educational inequalities. Therefore, within this framework, GenAI can be understood as an emergent form of digital capital, one that may differentially advantage institutions and learners who already possess the resources and expertise to engage with it effectively. Importantly, this study does not position digital capital as something generated through GenAI use itself; rather, it is treated as a pre-existing resource that shapes students' opportunities to benefit from AI-enabled learning environments. We perceive it as a condition and use the term descriptively and in an explanatory fashion to show how unequal digital capital may intensify inequity.

Empirical research on digital inequality in education suggests that technological innovations often reproduce, rather than disrupt, existing social hierarchies (Kizilcec and Lee 2022). Studies of educational technology adoption demonstrate that learners from more privileged backgrounds are better positioned to exploit new tools, while those with limited digital access or support experience fewer benefits or face additional risks (Selwyn 2016). In vocational contexts, these dynamics are intensified by the applied nature of learning and the reliance on institutional infrastructure, industry-standard technologies, and staff expertise. In the context of GenAI, emerging scholarship raises concerns that unequal access to AI tools, professional development, and institutional guidance may exacerbate stratification within and between FE colleges (e.g. Selwyn 2022; Williamson and Eynon 2020). Well-resourced institutions are more likely to experiment with GenAI, develop internal expertise, and integrate AI literacy into curricula, thereby accumulating symbolic and practical advantages. Conversely, colleges operating under financial constraint (particularly those in rural or socioeconomically disadvantaged areas) may adopt more restrictive or defensive approaches, limiting learners' exposure to GenAI and its associated skills. Such divergence risks creating uneven vocational trajectories in an increasingly AI-mediated labour market.

Nancy Fraser's (1997) concept of participatory parity provides a useful lens for analysing these dynamics. From this perspective, social justice requires not only formal access to education, but the material and cultural conditions necessary for individuals to participate on equal terms. Applied to GenAI in vocational education, participatory parity highlights the importance of equitable access to AI tools, transparent assessment practices, and meaningful opportunities to develop AI-related competencies. Without such conditions, learners in under-resourced FE contexts may be structurally excluded from the benefits that GenAI policies purport to offer.

Assessment practices represent a particularly acute site of equity concern. Research on assessment reform suggests that when new technologies are introduced without clear guidance and support, disadvantaged learners are often disproportionately penalised, either through heightened surveillance or restrictive rules that limit legitimate learning support (Bearman et al. 2024; Ecclestone 2018). In vocational education, where assessment is closely tied to progression, certification, and employability, inconsistent or overly cautious approaches to GenAI may have long-term consequences for learner outcomes.

Equity considerations extend beyond learners to include institutions themselves. Research on further education highlights substantial variation in colleges' capacity to respond to policy innovation, shaped by differences in funding levels, leadership stability, and access to professional development (Ball, Maguire, and Braun 2012; Bathmaker 2017; Keep 2018). When national policies assume uniform institutional capacity, they risk reinforcing what has been described as a 'Matthew effect', whereby institutions with greater resources are better positioned to benefit disproportionately from reform initiatives (Merton 1968; Selwyn 2016). In this sense, equity-oriented policy analysis must attend not only to individual learners but also to the structural positioning of FE institutions within the education system.

This literature suggests that GenAI is not merely a technical tool but a socio-political intervention with distributive consequences. Without explicit equity safeguards, the integration of GenAI into vocational education risks deepening existing inequalities under the guise of innovation. This insight reinforces the need to analyse GenAI policy enactment in FE colleges through a social justice lens, examining who gains, who loses, and under what conditions. By foregrounding issues of equity and digital capital, this section establishes a critical foundation for analysing the empirical material in the subsequent sections. It underscores that the success of GenAI in vocational education cannot be judged solely by efficiency gains or innovation rhetoric but must be assessed in terms of its contribution to fair participation and just outcomes.

Methodology

Research design

This study adopts a qualitative documentary policy analysis to examine how national policies promoting GenAI are enacted within English FE colleges. Documentary analysis is particularly appropriate for research concerned with policy enactment, as it enables systematic examination of how policy texts articulate ambitions, construct problems, and anticipate institutional responses, without assuming a linear translation from policy to practice

(Ball, Maguire, and Braun 2012; Bowen 2009). Given the recent emergence of GenAI in education, and the evolving nature of policy guidance, this approach allows for a critical analysis of policy discourse and institutional interpretation across a defined period (2023–2025).

Rather than treating policy documents as neutral representations of intent, this study conceptualises them as social and political artefacts that are interpreted, negotiated, and recontextualised within local institutional settings. This aligns with the policy enactment framework, which foregrounds the interaction between policy texts, contextual conditions, and actors in shaping educational practice (Ball, Maguire, and Braun 2012).

Data sources and selection

The documentary corpus comprised publicly available materials produced between 2023 and 2025 and was assembled to capture both national policy ambitions and institutional responses within the FE sector. The corpus was purposive rather than exhaustive, and it was organised around three broad categories of sources.

First, national policy and regulatory texts were included to represent the main policy actors shaping GenAI discourse in English education. These included Department for Education guidance on generative artificial intelligence in education (DfE 2023, updated 2025), Ofqual's approach to regulating the use of artificial intelligence in qualifications (Ofqual 2024), and Skills England strategy documents on workforce development and digital skills (Skills England 2025b), within which AI literacy is framed as an emerging priority rather than a standalone GenAI policy.

Second, sector-level interpretive and contextual materials were included to capture broader narratives about AI readiness, digital capacity, and the conditions shaping institutional engagement with GenAI. These comprised Ofsted's early adopters study on AI in FE (2025), together with relevant sector-wide reviews produced by Jisc and the Gatsby Charitable Foundation.

Third, institutional materials were drawn from a purposive sample of six FE colleges in England. Colleges were selected to reflect variation in geographic location, size, specialism, and approach to digital innovation, in order to capture how situated institutional conditions mediate policy enactment across different FE contexts. For each college, publicly accessible strategic plans, digital or AI strategies, and related policy documents were collected, alongside the corresponding Ofsted inspection report published within the analytical timeframe. Pseudonyms (College A – F) are used to preserve the analytical focus on patterns of enactment rather than the identities of individual institutions. A summary of the sampled colleges is provided in [Appendix](#).

Taken together, these sources provide a focused multi-level corpus through which to examine how GenAI is articulated in national discourse, mediated through regulatory and sectoral texts, and interpreted within institutional settings.

Analytical procedure

The analysis adopted a thematic and interpretive approach informed by Braun and Clarke's (2006) framework, adapted for document-based analysis rather than empirical qualitative fieldwork. The process began with repeated reading of national policy, regulatory, and institutional documents to build familiarity with the corpus and to identify recurring narratives, assumptions, and points of tension. Rather than systematic line-by-line coding, the analysis was guided by a set of sensitising concepts drawn from the theoretical framework (e.g. policy ambition, risk management, enactment gaps, digital capital, and equity), alongside themes that became salient through engagement with the texts. These analytic categories were used to organise and interpret patterns within and across document sets (national policy, regulatory guidance, and institutional materials), supporting an examination of how GenAI-related issues were framed and prioritised.

Attention was directed to:

- tensions between innovation and regulation
- differences in institutional capacity and readiness
- the implicit and explicit treatment of equity and disadvantage

The resulting themes were interpreted through the combined lenses of policy enactment theory and social justice perspectives, foregrounding questions about whose interests are served, which learners are imagined, and how risk and responsibility are distributed. This analysis is illustrative rather than exhaustive or empirical, aiming to develop a critical reading of how GenAI-related policies are articulated and positioned within the FE sector.

Ethical considerations

All materials analysed in this study consist of publicly available policy and regulatory documents, alongside anonymised examples of routine institutional communications. No personal or directly identifiable data were collected, and the ethical risk associated with the study is therefore minimal.

All potentially identifying details have been removed to preserve organisational anonymity and avoid attribution to specific individuals or settings. In line with commonly accepted guidance on research using publicly

available and anonymised documentary sources, formal ethics committee approval was not sought.

Limitations

As a documentary analysis, this study is constrained by its reliance on secondary data and publicly available sources, which are typically produced for regulatory or accountability purposes and may therefore offer incomplete representations of practice (such as unreported GenAI experimentation or informal adoption challenges). The findings should therefore be read as indicative rather than exhaustive, especially with changing dynamics such as AI technologies. Accordingly, the claims advanced in this paper are appropriately cautious: the analysis identifies indicative patterns and tensions in the enactment of GenAI policy in FE, rather than offering comprehensive or generalisable accounts of practice across the sector. While Ofsted's early adopters study offers valuable sector-specific insight, the absence of primary interviews limits the depth and diversity of institutional perspectives, particularly regarding underrepresented college contexts or specific learner groups. Future research could address these constraints through empirical studies involving interviews with FE leaders, teachers, and learners, alongside longitudinal analyses of GenAI-related outcomes.

Findings

National policy ambitions for generative AI

This section analyses how enactment is represented and rationalised in policy and sector guidance texts, rather than directly observed practice. As with many preceding technologies, discourse around GenAI is framed as a potential catalyst for reform in vocational education and training, but this framing is articulated through different emphases across national policy, regulatory, skills, and sector-support documents.

The Department for Education's guidance on generative AI (DfE 2023, updated 2025) constructs the technology in strongly opportunity-oriented terms, explicitly stating that it can help the education workforce by 'reducing some of the administrative burdens that hard-working teachers, staff and school leaders face in their day-to-day roles' and by supporting 'feedback and tailored support' in schools and colleges. It also presents generative AI as potentially useful for 'lesson and curriculum planning,' 'creating educational resources,' 'administrative tasks,' and 'supporting personalised learning,' while noting that 'evidence is still emerging' on the benefits and risks of pupil and student use. Although the guidance refers to barriers such as 'connectivity,' it does not

substantively differentiate between institutions with uneven levels of digital capacity, infrastructure, or readiness. As a result, the document advances an expansive vision of GenAI's potential while leaving the material variability of enactment across FE colleges only partially addressed.

Ofqual's regulatory approach (2024), by contrast, adopts a more precautionary stance, foregrounding 'fairness for students,' 'maintaining validity of qualifications,' 'protecting security,' and 'maintaining public confidence,' while still leaving room for 'enabling innovation.' The guidance emphasises that generative AI creates new risks for assessment, especially in non-exam assessment, where coursework and other out-of-exam tasks are described as 'potentially placed under more pressure.' It is also explicit that using AI as a sole marker 'does not comply' with Ofqual's regulations and that AI as a sole remote invigilator is 'unlikely to be compliant,' because such uses risk undermining human judgement, authenticity, and the secure conduct of assessment. In this respect, Ofqual frames AI less as a general pedagogical opportunity than as a technology whose use must remain bounded by evidential assurance, regulatory oversight, and protection of qualification credibility.

Skills-related policy discourse further positions AI literacy as part of wider workforce readiness, though not primarily through a standalone FE policy text. Skills England's AI skills tools package (2025a) classifies AI capability into 'technical,' 'responsible and ethical,' and 'non-technical' domains, and states that the tools are intended to help employers, educators, and policymakers 'assess AI skills, plan training, and support responsible adoption of AI across all sectors.' It also identifies 'AI literacy' and 'prompt writing' as core competencies across job levels, suggesting that AI capability is not confined to technical specialists but distributed across entry, mid, and managerial roles. In this framing, FE colleges are implicitly positioned as key sites for developing an AI-capable workforce, with responsibility extending beyond curriculum delivery to broader forms of workforce preparation and upskilling.

Jisc's FE guidance echoes this wider policy discourse, but translates it into more practical expectations around staff development and institutional safeguards (JISC, 2025). Its 2025 staff guidance states that it is intended to help staff use AI 'safely, ethically, and confidently' and argues that equipping staff with the skills and knowledge to use AI well 'should be at the heart of every college's approach.' At the same time, the guidance repeatedly emphasises human oversight, data protection, accessibility, copyright, and accuracy, requiring staff to check outputs for 'factual accuracy and bias' and to avoid entering confidential data into tools without appropriate institutional controls. Jisc therefore reinforces a dual message already visible elsewhere in the policy landscape: generative AI is presented as beneficial for efficiency,

teaching, and learner support, but only where colleges can build the staff capability and governance arrangements necessary for responsible use.

Institutional enactment in FE colleges

The prominence of early adopter institutions in regulatory and policy-facing texts introduces a degree of early adopter bias. This can obscure the conditions that make experimentation possible in the first place and can understate the pressures FE colleges work under, including financial constraints, staff capacity, and reputational concerns linked to inspection. Jennings and Brett (2025) make a similar point in showing that uptake tends to be concentrated in more progressive institutions, although they also note that colleges approach innovation in different ways. Some use GenAI for quick operational purposes, while others take a more exploratory approach and invest more time in shaping prompts and context.

Across the sampled FE colleges, institutional documents more often stress risk than pedagogical opportunity. Concerns about malpractice, plagiarism, and regulatory compliance are prominent, and these concerns often appear in guidance that restricts or discourages the use of GenAI in assessed work, sometimes without much parallel discussion of teaching use or staff development. In some cases, AI is dealt with mainly through an Academic Misconduct Policy (College E 2024) or through College D's AI Policy (2024), where the main emphasis is on protecting academic integrity. In others, there is a somewhat more developed response, including steering groups, working groups, or formal Guidance on Artificial Intelligence (College F 2024), suggesting that some colleges are trying to manage the issue rather than simply close it down.

A smaller group of colleges place GenAI within broader institutional planning. College A's AI Policy (2025), for example, refers to the possible value of generative AI for both institutional management and student learning, and it links this to staff training. College B gives AI a similarly strategic place through its Digital & Artificial Intelligence Strategy (2025), which suggests longer-term planning rather than a purely reactive response. College C sits somewhere in between. Its Digital Strategy (2025) aims to create a transformative digital learning environment, but GenAI itself is not discussed in much detail and is folded into a wider digital capability agenda. Overall, the sample points to uneven enactment across FE colleges, ranging from more strategic engagement to more cautious forms of control.

Tensions and equity implications

The divergence between national ambitions and institutional realities gives rise to significant tensions, particularly in relation to equity.

Rather than demonstrating realised inequities, the analysed materials point to emerging risk trajectories through which GenAI-related policy enactment may reproduce or intensify existing inequalities within the FE sector. Across the documents analysed, the enactment of GenAI appears closely tied to differences in institutional capacity, with some providers depicted as having considerably more room to manoeuvre than others.

In this analysis, a small group of colleges are interpreted as having the digital capacity and strategic space to experiment with GenAI, invest in staff capability, and develop local expertise (for example, College A and College B), thereby accumulating what can be conceptualised as digital capital that enhances their ability to innovate and adapt. By contrast, other colleges, often described in the documents as operating under financial or organisational pressure, and in some cases serving highly disadvantaged communities (for example, College D and College E) seem to have more limited technical and human resources to engage meaningfully with GenAI, resulting in slower or more restricted adoption.

These disparities have direct implications for learners, particularly as FE colleges disproportionately serve working-class adults, learners with prior educational disadvantage, and those seeking reskilling or upskilling later in life. Where GenAI adoption is limited, such learners may be denied access to tools that could support personalised learning, formative feedback, and flexible study practices. As a result, policies framed as democratising risk reproducing, and potentially intensifying, existing educational and social inequalities.

These dynamics become especially visible when early adopter narratives are treated as implicit benchmarks for good practice. Where regulatory and policy discourse foregrounds innovation without equivalent attention to institutional starting points, resource baselines, or workforce conditions, colleges with limited capacity are positioned as lagging rather than structurally constrained. These risks reframing inequality as institutional failure rather than as a predictable outcome of uneven policy enactment.

This tension sits uneasily alongside the equity-oriented rhetoric present in national policy discourse. Rather than functioning as a universally accessible leveller, GenAI emerges in this analysis as a potentially stratifying technology: offering clear benefits where resources and expertise are available, while risking the deepening of stratification across the FE landscape where they are not. This concern aligns with wider warnings in international policy discussions, including the US Department of Education's (2023) report on AI, which cautions that quality management is necessary if disadvantaged students are not to fall further behind as existing gaps widen at scale.

Discussion

This discussion brings together the findings to clarify the paper's three related contributions to debates in vocational education and training. It considers how policy enactment theory helps to make sense of the uneven distribution of GenAI-related digital capital across FE institutions, examines the ways in which gaps between national discourse and local practice generate tensions in curriculum, assessment, and staff development, and identifies the conditions under which GenAI may support rather than undermine social justice in English further education.

Building on Ball, Maguire, and Braun's (2012) theory of policy enactment, the findings suggest that GenAI has become a distinctive policy object within FE. Its technical opacity and regulatory uncertainty do not simply mirror existing inequalities between institutions; they also intensify them. National policy discourse in England, expressed through a fragmented set of texts such as DfE (2023, updated 2024) and the AI Skills report for the UK Workforce (Skills England 2025a), presents GenAI in ambitious and often optimistic terms. Yet the analysis shows that its enactment in FE colleges is shaped by contextual constraints, especially differences in resources, staff expertise, institutional cultures, and perceptions of regulatory risk. In this respect, situated realities are not passive backdrops to policy. They are active filters through which national ambitions are translated into uneven and often restrictive practices. In resource constrained settings, limited access to professional development, uncertainty around assessment integrity, and competing organisational priorities all affect how GenAI is understood and used. As a result, many colleges respond cautiously, giving greater priority to risk management than to pedagogical experimentation. This interpretation is consistent with Jennings and Brett (2025), who show that meaningful implementation requires time, experimentation, contextual understanding, and intermediary support. It also resonates with Scott and Dwight's (2025) survey of vocational educators, where GPT tools are used mainly for rapid resource and assessment generation, alongside concerns about output quality and the possible erosion of professional judgement.

The findings suggest that GenAI may function as a new form of digital capital in vocational education, whose uneven distribution risks reproducing social inequality. The results align with the arguments put forward by Kizilcec and Lee (2022), who argue that without intentional design for fairness, technological innovations risk perpetuating existing social hierarchies rather than dismantling them. Access to GenAI tools, staff confidence in their pedagogical use, and institutional capacity to experiment safely all contribute to the accumulation of what can be conceptualised as digital capital. Colleges with greater financial and human resources appear better positioned, in the analysed material, to convert GenAI into educational

advantage, while under-resourced and rural institutions risk exclusion from these emerging benefits. For learners, particularly working-class adults, career changers, and those with prior educational disadvantage, this uneven access threatens to widen existing disparities in vocational outcomes. Without targeted intervention, these dynamics undermine Nancy Fraser's (1997) principle of participatory parity. When learners are systematically denied access to technologies that enhance feedback, flexibility, and skill development, their capacity to participate on equal terms in vocational pathways is compromised.

Overall, this discussion suggests that the central issue is not simply whether GenAI has transformative potential, but who is able to make use of that potential, and under what conditions. Policy ambition, without corresponding investment in institutional capacity and equity-oriented safeguards, risks entrenching rather than alleviating inequalities in vocational education. This reinforces the central argument of the paper: GenAI in FE is a double-edged sword, capable of both innovation and exclusion, depending on how policy enactment is supported and governed, or neglected.

Conclusion and recommendations

This paper has critically examined the enactment of national policies promoting GenAI within English FE colleges between 2023 and 2025. Drawing on policy enactment theory and a social justice lens, the analysis suggests that while national ambitions for GenAI in vocational and technical education are expansive and rhetorically compelling, their translation into institutional practice remains partial, uneven, and deeply shaped by contextual inequalities. The resulting enactment gaps carry significant risks for equity, particularly within a sector that serves a high proportion of disadvantaged, adult, and working-class learners.

The findings point to a persistent disjuncture between policy aspiration and institutional capacity. National policy texts frame GenAI as a transformative and democratising force, promising personalised learning, reduced teacher workload, and enhanced workforce readiness. However, in practice, many FE colleges lack the resources, training, and regulatory clarity required to enact these ambitions in sustained and pedagogically meaningful ways. Instead, GenAI is often approached defensively, with institutional responses dominated by concerns over assessment integrity and compliance rather than innovation. As Ofsted (2025) warns, 'the biggest risk is doing nothing'; yet this study argues that uncoordinated or inequitable action may be equally problematic.

The analysis also suggests that, without targeted support, GenAI risks reinforcing existing structural inequalities across the FE sector. Colleges with greater financial and organisational capacity are better positioned to

experiment, develop expertise, and accumulate digital capital, while rural and under-resourced institutions struggle to move beyond minimal or restrictive engagement. For learners, this uneven enactment threatens participatory parity, limiting access to emerging forms of support, feedback, and skill development that are increasingly valued in AI-mediated labour markets.

To address these challenges, the paper advances the following policy and practice recommendations:

Professional development support

The findings suggest a strong case for more sustained support for staff development in relation to GenAI, particularly in colleges serving disadvantaged or rural communities. Greater investment in staff confidence, pedagogical capability, and critical AI literacy could help institutions move beyond predominantly risk-averse responses towards more informed and context-sensitive forms of implementation.

Clearer vocationally grounded regulatory guidance

The analysis indicates that colleges may benefit from clearer and more vocationally grounded guidance on the use of GenAI in assessment. Closer alignment between Ofqual, awarding organisations, and FE providers could help reduce institutional uncertainty and limit the proliferation of highly restrictive local interpretations that are shaped more by anxiety than by pedagogical reasoning.

Diagnostic tools for institutional readiness

The patterns identified in this study support exploration of practical frameworks that could help FE colleges assess their readiness for GenAI adoption, identify gaps in infrastructure and expertise, and plan contextually appropriate responses. Such tools may be particularly valuable in a sector characterised by uneven capacity and differing contexts.

National pilots supporting 'AI champions'

The findings also suggest that colleges may benefit from structured support for staff who can act as 'AI champions', including through pilot activity, peer learning, and cross-college experimentation. In under-resourced settings, such roles may provide a practical means of building internal capability without assuming that innovation will emerge evenly across institutions.

Equity-focused resource allocation

This analysis strengthens the case for more explicit attention to inequality in the distribution of resources for GenAI-related development. Shared regional infrastructure, targeted support arrangements, or differentiated funding approaches could help reduce the risk that access to GenAI-enabled innovation becomes shaped primarily by geography or institutional advantage.

Cross-sector knowledge sharing

The study suggests that more structured collaboration between FE colleges, employers, awarding organisations, and early adopters may support the circulation of practice-based knowledge across the sector. Such collaboration could also help reduce duplication of effort and make it easier for colleges with fewer internal resources to engage with emerging practice in more informed ways

Considering equity impact assessment

The findings support closer and more explicit attention to the equity implications of GenAI adoption in vocational education. One implication is that colleges and policymakers could benefit from using an equity impact assessment approach when introducing GenAI-related practices or tools, with attention to accessibility, bias, staff capability, and unintended consequences for disadvantaged learners. Such an approach would align with established public policy practices and institutional precedents, such as Equality Impact Assessments (EIAs) under the UK Equality Act 2010. This would provide a more systematic way to assess who benefits, who is excluded, and where additional support may be needed.

Finally, this study highlights important directions for future research. Longitudinal empirical studies are needed to examine the impact of GenAI on learner outcomes in vocational education, including retention, progression, and employment trajectories. In addition, qualitative research incorporating the voices of practitioners, learners, and institutional leaders would deepen understanding of how GenAI is experienced on the ground and how policy enactment unfolds over time.

In conclusion, GenAI holds considerable promise for vocational education in England, but realising this promise requires more than aspirational policy discourse. Without such systemic intervention, GenAI risks becoming another layer of stratification within an already uneven FE landscape: a technology whose benefits accrue disproportionately to institutions and learners who are already advantaged. A deliberate shift from ambition to capacity-building, and from universal rhetoric to targeted support, is

essential if GenAI is to contribute to a more just and inclusive future for Further Education.

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Appendix. Sampled FE colleges

Pseudonym	Category	Brief Neutral Description	Document Type	Year	Key Evidence
College A	Development-oriented	College with an explicit AI policy that recognises generative AI and refers to staff development	AI Policy	2025	'recognise the potential for Artificial Intelligence (AI), particularly Generative AI ... ' + staff training
College B	Development-oriented	Specialist college with a formal Digital & Artificial Intelligence Strategy	Digital & AI Strategy	2025	Strategy title explicitly references Artificial Intelligence
College C	Digital-focused	College with a strong digital transformation strategy and limited explicit reference to generative AI	Digital Strategy	2025	'create a transformative digital learning environment'
College D	Integrity-focused	College with a formal AI policy emphasising academic integrity and responsible use	AI Policy	2024	Emphasis on academic integrity and plagiarism prevention
College E	Integrity-focused	College where AI is addressed primarily through academic misconduct procedures	Academic Misconduct Policy	2024	Focus on plagiarism and academic misconduct
College F	Guidance-focused	College providing formal guidance on safe and appropriate AI use	Guidance on Artificial Intelligence	2024	Official guidance document