

# Artificial Intelligence (AI) Policy

## St. Michael's Catholic Grammar School



Approved by: Headteacher

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*A Voluntary Aided School in the Trusteeship of St. Michael's Catholic School Trustee, a  
Member of the Loreto Education Trust  
Founded by the Sisters of the Poor Child Jesus*

## 1. Aims and Scope

Here at St. Michael's Catholic Grammar School we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation. We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations.

Therefore, the aim of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole school community. This policy covers the use of AI tools by school staff, governors and pupils, including generative chatbots such as ChatGPT and Google Gemini.

This policy aims to:

- Support the use of AI to enhance teaching and learning.
- Support staff to explore AI solutions to improve efficiency and reduce workload.
- Prepare staff, governors and pupils for a future in which AI technology will be an integral part.
- Promote equity in education by using AI to address learning gaps and provide personalised support.
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils.
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR.

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## 2. Legislation and Guidance

This policy meets the requirements of and is based on guidance from:

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).
- The Information Commissioner's Office (ICO) on data protection and privacy, which is relevant when using AI tools that collect or process student data.
- The Department for Education (DfE) guidance, specifically "Generative artificial intelligence in education".
- The Joint Council for Qualifications (JCQ) guidelines on the use of AI in assessments.
- AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence.

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## 3. Definitions

This policy refers to both 'open' and 'closed' generative AI tools. These are defined as follows:

- **Open generative AI tools** are accessible and modifiable by anyone. They may store, share or learn from the information entered into them, including personal or sensitive information.
- **Closed generative AI tools** are generally more secure, as external parties cannot access the data you input.

Term	Definition
<b>Artificial Intelligence (AI)</b>	Technology that is already widely used in commercial and everyday applications and is anticipated to grow exponentially, impacting almost all industries including education.
<b>Generative AI</b>	AI technology that can be used to create new content, such as writing, audio, code, images, and video simulations, based on the large volumes of data on which it has been trained.
<b>Large Language Models (LLMs)</b>	A type of AI that can process and generate human-like text and other content. These are the core technology behind many generative AI tools.

#### 4. Regulatory principles

We follow the 5 principles set out in the AI regulation white paper.

Regulatory principle	WE WILL ...		
Safety, security and robustness	Ensure that AI solutions are secure and safe for users and protect users' data.	Ensure we can identify and rectify bias or error.	Anticipate threats such as hacking.
Appropriate transparency and explainability	Be transparent about our use of AI, and make sure we understand the suggestions it makes.		
Fairness	Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.		
Accountability and governance	Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI.		
Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology.	Respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.	

## **5. Roles and Responsibilities**

This policy applies to all staff, students, governors, volunteers, and contractors working on behalf of the school.

### **5.1 The Governing Body: The governing body will:**

Take overall responsibility for monitoring this policy and holding the headteacher to account for its implementation in line with the school's AI strategy.

Ensure the headteacher is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school.

Adhere to the guidelines below to protect data when using generative AI tools:

- Use only approved AI tools.
- Seek advice from the data protection officer/IT and the designated safeguarding lead, as appropriate.
- Check whether they are using an open or closed generative AI tool.
- Ensure there is no identifiable information included in what they put into open generative AI tools.
- Acknowledge or reference the use of generative AI in their work.
- Fact-check results to make sure the information is accurate.

### **5.2 Headteacher**

The headteacher will:

Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation.

Liaise with the DSL to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the school's child protection and safeguarding policy.

Ensure that the guidance set out in this policy is followed by all staff.

Review and update this AI policy as appropriate, and at least annually.

Ensure staff are appropriately trained in the effective use and potential risks of AI.

Make sure pupils are taught about the effective use and potential risks of AI.

Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO and data protection impact assessments.

### **5.3 Data Protection Officer (DPO)**

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI. Our DPO is Neil Hinnem and is contactable via his school email or phone extension.

### **5.4 Designated Safeguarding Lead (DSL)**

The DSL is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI.
- Updating and delivering staff training on AI safeguarding threats.
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE) and the school's child protection and safeguarding policy.
- Understanding the filtering and monitoring systems and processes in place on school devices.
- The school's DSL is Kat Heron and is contactable via school email or phone extension.

## **5.5 All Staff**

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- Use only approved AI tools. Authorised tools include the school's endorsed applications, such as those within Google Workspace for Education.
- Seek advice from the data protection officer/Deputy Headteacher as appropriate.
- Report safeguarding concerns to the DSL in line with our school's child protection and safeguarding policy.
- Check whether they are using an open or closed generative AI tool.
- Ensure there is no identifiable information included in what they put into open generative AI tools.
- Acknowledge or reference the use of generative AI in their work.
- Fact-check results to make sure the information is accurate.

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning and have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

## **5.6 Pupils**

Pupils must follow the guidelines set out in section 8 of this policy ('Use of AI by pupils').

## **5.7 Parents/Carers Parents/Carers are responsible for:**

Supporting the school's AI policy and discussing responsible AI use with their child.

Communicating with the school if they have concerns about AI use in their child's education.

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## **6. Staff and Governors' Use of AI**

### **6.1 Approved Use of AI**

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete, but cannot replace the judgement and knowledge of a human expert. Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it. Any member of staff or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it. Always consider whether AI is the right tool to use.

## **6.2 Process for Approval**

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload and should contact the relevant member of SLT to discuss any ideas they may have. SLT are responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from relevant staff, the DPO and data protection impact assessments.

## **6.3 Data Protection and Privacy**

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots. If personal and/or sensitive data is entered into an unauthorised generative AI tool, St. Michael's Catholic Grammar School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Google Workspace for Education products for which the school has subscribed are to be used whenever possible as they afford the greatest level of privacy and security.

## **6.4 Intellectual Property**

Most generative AI tools use inputs submitted by users to train and refine their models. Pupils own the intellectual property (IP) rights to original content they create, and this is likely to include anything that shows working out or is beyond multiple choice questions. Pupils' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright. Student work should only ever be uploaded to closed systems such as Google Workspace for Education.

## **6.5 Bias**

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications, which means fact and sense-checking the output. We will ensure we can identify and rectify bias or error by training staff in this area and regularly review our use of AI to identify and correct any biases that may arise. If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.

## **6.6 Raising Concerns**

We encourage staff and governors to speak to the headteacher in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment. Safeguarding concerns arising from the use of generative AI

must be reported immediately to the DSL in accordance with our school's child protection and safeguarding policy.

## **6.7 Ethical and Responsible Use**

We will always use generative AI tools ethically and responsibly and remember the principles set out in our school's equality policy when using generative AI tools. We will consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output and will fact and sense-check the output before relying on it.

Staff and governors must not:

- Generate content to impersonate, bully or harass another person.
  - Generate explicit or offensive content.
  - Input offensive, discriminatory or inappropriate content as a prompt.
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## **7. Acceptable Use of AI**

### **7.1 For Staff**

Staff may use AI to enhance their work, for example, with lesson planning, assisting to generate feedback, resource creation, assessment and administrative tasks. However, they must exercise professional judgment:

- All AI-generated output must be carefully reviewed for accuracy, bias, and quality.
- AI should be used to support, not replace, professional expertise and teaching skills.

### **7.2 For Students**

The use of AI by students must be age-appropriate and guided by staff:

- Students **below the age of 13** should not be encouraged to use free or open AI apps such as ChatGPT or Gemini. Those between 13 and 17 should only ever do so with consent of parents or guardians. Instead, work should incorporate closed, school-endorsed, apps, particularly those provided via Google Workplace for Education.
- Students are prohibited from using AI for cheating, plagiarism, or any form of academic dishonesty. Submitting AI-generated content as their own is a violation of academic integrity and will be subject to sanctions.
- When permitted, AI should be used as a tool for knowledge building, problem-solving, and creative exploration, not to avoid the learning process.

## **8. Use of AI by pupils**

We recognise that AI has many uses to help pupils learn. Pupils may use AI tools as a research tool to help them find out about new topics and ideas, and when specifically studying and discussing AI in

schoolwork, for example in IT lessons or art homework about AI-generated images. Where students are explicitly allowed or directed to use AI in their work they must acknowledge this by providing a citation or copy of the prompt used. All AI-generated content and tasks must be properly attributed and appropriate for the pupils' age and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, pupils may not use AI tools:

- During assessments, including internal and external assessments, and coursework.
- To write their homework or class assignments, where AI-generated text is presented as their own work.
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations).

This list of AI misuse is not exhaustive. Where AI tools have been used as a source of information, pupils should reference their use of AI, showing the name of the AI source and the date the content was generated. We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures.

Pupils must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully or harass another person.
- Generate or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils.
- Input offensive, discriminatory or inappropriate content as a prompt.

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## **9. Formal Assessments**

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments and will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments.

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## **10. Staff Training**

All staff will receive ongoing training on the use of AI in education to ensure they are kept up to date with developments in AI and can develop and improve their practice on a regular basis. This will include training on safe internet use, online safeguarding, and the ethical implications of AI. The Senior Leadership Team will be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI and for sharing good practice across the school.

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## **11. Referral to our Child Protection and Safeguarding Policy**

The school is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to sexual grooming, sexual harassment, sexual extortion, child sexual abuse/exploitation material, harmful content, harmful advertisements and promotions, and bullying. Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the DSL immediately. Any such incident will be dealt with according to the procedures set out in the school's child protection and safeguarding policy and child protection referral process.

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## **12. Breach of this Policy**

**12.1 By Staff** Breach of this policy by staff will be dealt with in line with our staff code of conduct. Where disciplinary action is appropriate, it may be taken whether the breach occurs during or outside of working hours, on an individual's own device or a school device, at home, at school or from a remote working location. Staff members will be required to co-operate with any investigation into a suspected breach of this policy and must report any breach of this policy to the headteacher immediately.

**12.2 By Governors** Governors found in breach of this policy will be subject to procedures as outlined in the Governors' Code of Conduct.

**12.3 By Pupils** Any breach of this policy by a pupil will be dealt with in line with our behaviour policy and, if required, our child protection and safeguarding policy. All student use of AI must be in line with established 'Acceptable use of ICT' rules.

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## **13. Monitoring and Transparency**

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by the Senior Leadership Team whenever there is a significant change to either AI use by the school or the associated risks of AI usage. This policy will be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations and will be shared with the full governing board at least annually.

The Senior Leadership Team is responsible for ensuring that the policy is followed and for monitoring the effectiveness of AI usage across the school. We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes, and feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

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## **14. Monitoring Arrangements**

The Senior Leadership Team is responsible for implementing and overseeing this policy. Given the rapid evolution of AI, this policy will be reviewed **biennially**, or more frequently if required, to align with emerging best practices, technological advancements, and changes in regulations.

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## **15. Links with other policies**

This AI policy is linked to our:

- Data Protection Policy
- Child Protection and Safeguarding Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Behaviour Policy
- Marking, Homework, Assessment and Reporting Policy