## **BROWNEDGE ST MARY'S CATHOLIC HIGH SCHOOL**



# AI Policy

| Approved by Full Governing Body    |                     | Date: December 2025        |
|------------------------------------|---------------------|----------------------------|
| Signature of Head Teacher/Chair of | Governors:          | Date:                      |
| Policy amended by: N Oddie         | Date: December 2025 | Review Date: December 2027 |

## Let Your Light Shine

If we love others, we live in the light. 1 John 2:10

Inspired by our Gospel Values, we have a shared responsibility to

- create an environment of welcome, love and respect for each member of our learning family.
- develop the unique gifts and talents of all, striving for excellence in everything we do.
- live out our commitment to love, service and justice in the local and global community.
- nurture the journey of faith and discovery for all
- celebrate and reflect on the love of God which is at the heart of all we are.

#### 1. Aims

1.0 At Brownedge St Mary's, 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. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

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

#### 1.1 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

### 2. Legislation

This policy reflects good practice guidelines/recommendations in the following publications:

- Al regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence
- > Generative artificial intelligence (AI) and data protection in schools, published by the Department for Education (DfE)

This policy also meets the requirements of the:

- > UK General Data Protection Regulation (UK GDPR) the EU GDPR was incorporated into UK legislation, with some amendments, by <u>The Data Protection</u>, <u>Privacy and Electronic Communications (Amendments etc) (EU Exit)</u> <u>Regulations 2020</u>
- > Data Protection Act 2018 (DPA 2018)

## 3. 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<br>Ensure we can identify and rectify bias or error<br>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 Al   |
| 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 Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment |

## 4. Roles and responsibilities

#### 4.0 Al Lead

Our generative AI lead is Mrs Oddie. They are responsible for the day-to-day leadership, ownership and management of AI use in the school.

#### 4.1 Governing board

The governing board 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 AI tools responsibly and apply professional judgement when selecting AI tools for governance tasks, ensuring no identifiable pupil or staff data is entered into open AI platforms.
  - Seek advice from the data protection officer / IT / Al lead and the designated safeguarding lead, as appropriate
  - o Check whether they are using an open or closed generative AI tool
  - o Ensure there is no identifiable information included in what they put into open generative AI tools
  - o Acknowledge or reference the use of generative AI in their work
  - o Fact-check results to make sure the information is accurate

## 4.2 Headteacher

The headteacher will:

- > Take responsibility for the day-to-day leadership and management of AI use in the school
- > 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 Al 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 every two years
- > Ensure staff are appropriately trained in the effective use and potential risks of Al
- Make sure pupils are taught about the effective use and potential risks of Al
- Sign off on approved new AI tools, taking into account advice from the DPO and data protection impact assessments

## 4.3 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 Mr John Burrows

## 4.4 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 Al
- > 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 Miss Chloe Mellor

## 4.5 All staff

As part of our aim to reduce staff workload while improving outcomes for pupils, we encourage staff to explore opportunities to use AI tools in ways that support efficiency and enhance teaching and learning. Any use of AI must follow the guidelines set out in this policy.

To protect data and ensure responsible use, staff must:

- Use their professional judgement when selecting AI tools, ensuring that no identifiable pupil or staff data is entered into any platform
- Seek advice from the DPO or AI Lead where necessary
- Report safeguarding concerns to the DSL
- Understand whether the tool is open or closed, and apply appropriate caution
- Acknowledge or reference the use of generative AI where appropriate
- Fact-check outputs for accuracy, bias and suitability
- Use the appendix checklist to support decision-making where helpful

All staff play a role in helping pupils understand both the benefits and limitations of AI and in developing pupils' ability to critically evaluate AI-generated content.

#### 4.6 Pupils

Pupils must follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

## 5. Staff and governors' use of Al

## 5.1 Use of Al

We are committed to helping staff and governors reduce workload and enhance professional practice through the responsible use of AI. Staff may use AI tools at their professional discretion to support planning, teaching, assessment and administration, provided no identifiable pupil or staff data is entered and all outputs are checked for accuracy, bias and appropriateness.

Where helpful, staff are encouraged to use the checklist in Appendix One to support decision-making. All can accelerate certain tasks, but it must never replace professional judgement or the expertise required for teaching, assessment or pastoral care.

The quality and accuracy of any work produced with AI remains the responsibility of the individual who uses it. AI-generated content used for planning or resource creation should be clearly attributed where appropriate and only shared with colleagues once reviewed for accuracy.

Always consider whether AI is the right tool for the task; its availability does not mean it is always appropriate.

#### 5.2 Process for approval

Staff are welcome to suggest new ways of using AI with pupils to improve outcomes or support learning. Such proposals should be discussed with the headteacher, who is responsible for approving any AI tools or uses involving pupils, taking into account safeguarding, data protection advice and relevant risk assessments.

## 5.3 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, Brownedge St Mary's will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy.

#### 5.4 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. 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. Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

#### 5.5 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. This means fact and sense-checking the output.

We will ensure we can identify and rectify bias or error by training staff in this area.

We also 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.

#### 5.6 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.

## 5.7 Ethical and responsible use

## We will always:

- > Use generative AI tools ethically and responsibly
- Remember the principles set out in our school's equality policy when using generative AI tools
- > 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
- > 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

## 6. Educating pupils about AI

Here at Brownedge St Mary's, we acknowledge that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI.

In KS3, pupils will be taught to:

- > Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- > Recognise inappropriate content, contact and conduct, and know how to report concerns

## Pupils in KS4 will be taught:

> To understand how changes in technology affect safety, including new ways to protect their online privacy and identity

How to report a range of concerns

By the end of secondary school, pupils will know:

- > Rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- > Online risks, including the importance of being cautious about sharing personal information online and of using privacy and location settings appropriately to protect information online. Pupils should also understand the difference between public and private online spaces and related safety issues
- > The characteristics of social media, including that some social media accounts are fake, and / or may post things which aren't real / have been created with AI. That social media users may say things in more extreme ways than they might in face-to-face situations, and that some users present highly exaggerated or idealised profiles of themselves online
- > Not to provide material to others that they would not want to be distributed further and not to pass on personal material which is sent to them. Pupils should understand that any material provided online might be circulated, and that once this has happened there is no way of controlling where it ends up. Pupils should understand the serious risks of sending material to others, including the law concerning the sharing of images
- > That keeping or forwarding indecent or sexual images of someone under 18 is a crime, even if the photo is of themselves or of someone who has consented, and even if the image was created by the child and/or using Algenerated imagery. Pupils should understand the potentially serious consequences of acquiring or generating indecent or sexual images of someone under 18, including the potential for criminal charges and severe penalties including imprisonment. Pupils should know how to seek support and should understand that they will not be in trouble for asking for help, either at school or with the police, if an image of themselves has been shared. Pupils should also understand that sharing indecent images of people over 18 without consent is a crime
- > What to do and how to report when they are concerned about material that has been circulated, including personal information, images or videos, and how to manage issues online
- About the prevalence of deepfakes including videos and photos, how deepfakes can be used maliciously as well as for entertainment, the harms that can be caused by deepfakes and how to identify them
- > That social media can lead to escalations in conflicts, how to avoid these escalations and where to go for help and advice
- > How to identify when technology and social media is used as part of bullying, harassment, stalking, coercive and controlling behaviour, and other forms of abusive and/or illegal behaviour and how to seek support about concerns
- > How information and data is generated, collected, shared and used online
- > That websites may share personal data about their users, and information collected on their internet use, for commercial purposes (e.g. to enable targeted advertising)
- > That AI chatbots are an example of how AI is rapidly developing, and that these can pose risks by creating fake intimacy or offering harmful advice. It is important to be able to critically think about new types of technology as they appear online and how they might pose a risk

## 7. Use of AI by pupils

We recognise that AI can help pupils learn when used safely and appropriately. Pupils may use AI functions built into search engines (such as Google's AI-supported search mode) for supervised research. AI may also be used during specific learning activities, such as computing tasks or art projects involving AI-generated images.

However, many AI tools require age verification or parental consent and cannot be universally restricted across all platforms. Pupils must therefore understand clearly what is and is not permitted in school and take responsibility for following these expectations.

To maintain academic integrity, pupils may not use AI tools:

- During internal or external assessments
- To generate homework or classwork that is submitted as their own
- To produce answers, explanations or solutions without teacher guidance

Any unreferenced use of AI is considered plagiarism. When AI is used as a research source, pupils must reference the tool and date of generation.

Pupils must never use AI to generate harmful, offensive, discriminatory or inappropriate content, including impersonation, harassment or inappropriate images.

#### 7.1 Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on Al use in assessments.

## 8. Use of Al by staff

Al tools are permitted for staff use and can support tasks such as lesson planning, resource creation, anonymised administrative drafting, brainstorming and idea development. Their use should enhance efficiency, creativity and teaching practice, while remaining aligned with the school's educational values. All must never replace human interaction or professional judgement in matters requiring staff expertise or care.

Staff may use AI tools at their professional discretion, provided no identifiable pupil or staff data is entered and all outputs are checked for accuracy, bias and appropriateness. Human oversight must remain central at all times. Any AI tool used directly by pupils, or incorporated into pupil activities, must be approved by the school.

Closed generative AI tools provide greater security and data protection because they operate within protected environments rather than storing or learning from user inputs. Open tools may store data, learn from prompts or process information outside the UK. For this reason, the school strongly encourages the use of closed generative AI wherever possible, particularly when working with curriculum materials, internal documents or content that could identify individuals. We advise all members of staff to ensure that settings on "Open" generative platforms are set to not share your data to train any models. This means, for example in ChatGPT, turning the "model improvement for everyone" setting to OFF.

At present, Microsoft Copilot offers the most secure environment for staff use. Open tools such as ChatGPT and Google Gemini may also be used with caution, following a clear risk assessment to ensure safeguarding, data protection and filtering requirements are met.

Al must never be used to:

- Make or influence pupil assessment grades
- Draft or submit safeguarding concerns or referrals
- Write staff performance appraisals or confidential HR reports

These tasks require human oversight and professional judgement.

## 9. Staff training

We are committed to ensuring that all staff develop a confident, informed, and responsible understanding of AI as it evolves. To support this, AI awareness and safe practice will be embedded within the school's wider programme of digital literacy and online safety training. Annual safeguarding and safe internet-use training will include specific guidance on the opportunities and risks associated with AI, including data protection, bias, misinformation, and the responsible use of generative tools.

Ongoing professional development will be coordinated by the SLT in collaboration with the AI Working Party and CPD Lead. They will ensure staff have regular access to high-quality CPD opportunities—both internal and external—including briefings, workshops, online modules, and subject-specific development sessions. These opportunities will be reviewed annually to ensure they reflect current best practice and emerging technologies.

The school will remain up to date with national guidance, research, and sector-wide developments by engaging with recognised educational bodies, professional networks, and local authority or trust-led digital learning groups. Good practice will be shared through termly staff meetings, and peer-led training, ensuring new insights and strategies are accessible across departments. Staff will be encouraged to trial AI tools within a safe, ethical framework and to share reflections to support continuous improvement and collective professional growth.

## 10. 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
- > 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.

## 11. Breach of this policy

#### 11.1 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. This may involve providing us with access to:

- The generative AI application in question (whether or not it is one authorised by the school)
- > Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the headteacher immediately.

### 11.2 By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy.

## 12. Monitoring and transparency

Al 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 Headteacher whenever there is a significant change to either Al use by the school or the associated risks of Al usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

The policy will be shared with the full governing board at least every two years.

All teaching staff are expected to read and follow this policy. The Headteacher is responsible for ensuring that the policy is followed and will monitor the effectiveness of Al 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. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

## 13. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Safeguarding/child protection policy
- Teaching and Learning policy including Homework Policy
- > Behaviour policy

- Staff code of conduct
- > Pupil, Staff and Governors Acceptable Use Policy
- Online safety policyEquality policy

## **AI Use Checklist for Staff**

Use this checklist each time you choose an AI tool to support your work.

| 1. Purpose  |
|---|
| <ul><li>□ I have a clear educational or workload-reduction purpose for using AI.</li><li>□ AI is the right tool for this specific task.</li></ul>   |
| 2. Data Protection  |
| <ul> <li>□ I am not entering any personal, sensitive, or identifiable pupil data.</li> <li>□ I am not entering sensitive staff information.</li> <li>□ I understand whether the tool is "open" or "closed".</li> </ul>  |
| 3. Accuracy & Professional Oversight  |
| <ul> <li>□ I will check the AI output for accuracy, bias, and appropriateness.</li> <li>□ I remain fully responsible for the final content.</li> <li>□ I am willing to acknowledge that AI assisted this work if shared.</li> </ul>   |
| 4. Ethics & Safeguarding  |
| <ul> <li>□ The AI use is safe, ethical, and aligns with safeguarding expectations.</li> <li>□ The task does <b>not</b> involve assessment judgments, safeguarding reports, or HR matters.</li> <li>□ The tool cannot accidentally generate harmful or inappropriate content.</li> </ul> |
| 5. Compliance with School Policy  |
| <ul><li>☐ My use aligns with school AI policy and GDPR responsibilities.</li><li>☐ If pupils will use the tool, it is school-approved and age-appropriate.</li></ul>  |
| 6. Impact on Learning   |
| ☐ This use of AI enhances learning, support, or efficiency. ☐ It does not reduce pupil independence, thinking, or skill development.  |
| <ul> <li>If all boxes are ticked → It is appropriate to use the AI tool.</li> <li>If any box is NOT ticked → Reconsider or seek advice before using AI.</li> </ul>  |