# Artificial Intelligence (AI) Policy

**This Artificial Intelligence (AI) Policy has been approved and adopted in January 2026 and will be reviewed in January 2027**

**Committee Responsible: Risk & Audit Committee**

## Intention

The intent of this policy is to ensure that the adoption and use of Artificial Intelligence across our Trust's schools is purposeful, safe, and educationally enriching. We are committed to integrating AI in ways that enhance teaching and learning, increase efficiency, support staff and students, and uphold the highest standards of privacy, security, and transparency. AI will be used as a tool to supplement—not replace—high-quality teaching, equipping students with essential digital skills and preparing them for success in a rapidly evolving digital world. It will reduce teacher workload and ensure our systems and processes are efficient and impactful. Our approach will be guided by clear goals, robust training, and ongoing oversight, ensuring that AI is used responsibly and ethically to benefit our entire Xavier community.

## Definitions

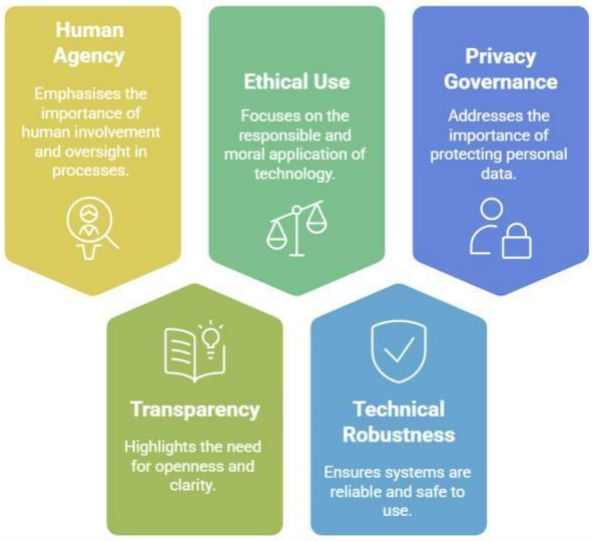
- **AI:** Artificial Intelligence, including machine learning, natural language processing (NLP), and large language models (LLMs).
- **LLM:** Large language models such as CoPilot/ChatGPT/Gemini/Claude which have Generative capabilities.
- **NLP:** Natural language processing such as Alexa / Siri - differs from the above and has fewer opportunities for bias and hallucination.
- **Image generation from LLM** - images can be created via text prompts which can be inappropriate or subject to bias.
- **Stakeholders:** Teachers, students, parents, administrative staff, and external partners.

## Objectives

- **Educational Enhancement**: To improve the quality of education and ensure that all children and young people leave Xavier equipped for adult life in a technologically evolving world.
- **Ethical Compliance**: To ensure ethical, legal and discerning use of AI.
- **Data Security**: To protect the privacy and data of all stakeholders.
- **Workload Reduction**: To utilise AI to reduce the administrative and academic workload of staff.
- **Innovation & Transformation**: To remain at the forefront of education by integrating AI to enhance and supplement the Xavier's mission to best support young people.

## Guiding Principles

There are 5 guiding principles underpinning this policy.




### Human Agency

- ✓ All decisions shall remain the responsibility of staff, leaders or governors.
- ✓ AI tools must be used to inform, not dictate, outcomes.
- ✓ Staff and students must be able to review, challenge or override AI outputs.
- ✓ Staff and students must be empowered to harness the benefits of AI.
- ✓ AI use must be supervised by a responsible adult in all educational settings.
- ✓ Clear roles and responsibilities for AI oversight must be defined at all levels.
- ✓ Concerns about staff or student use of AI must be addressed through existing behaviour, complaints, malpractice or safeguarding procedures.
- ✓ AI should enhance not replace human creativity.
- ✓ AI tools must align with curriculum objectives or desirable workload efficiency savings.
- ✓ Leaders must evaluate the pedagogical benefits of AI tools before implementation.

### Ethical Use

- ✓ AI must be used in a discerning manner that promotes fairness, protects individual rights, and avoids harm.
- ✓ Only approved AI tools may be used.
- ✓ All users must respect copyright and intellectual property laws.
- ✓ AI must not be used to impersonate, harass, or generate offensive content.
- ✓ Bias in AI outputs must be identified, challenged, and corrected.

- ✓ Staff and students will be trained to use AI safely and to critically evaluate AI generated content.
- ✓ All AI use must align with the Trust's safeguarding, equality, behaviour and IT acceptable use policies.

**Privacy Governance**

- ✓ No personal or sensitive data may be entered into unauthorised AI tools.
- ✓ All AI tools must be vetted for GDPR compliance by the DPO.
- ✓ Data Protection Impact Assessments (DPIAs) must be completed for new AI tools.
- ✓ Staff must be trained on data privacy risks associated with AI.
- ✓ Breaches of data privacy involving AI must be reported and investigated immediately through the appropriate channels.
- ✓ Students and parents must be informed about and consent to their data being used in AI systems (as appropriate for age).
- ✓ Staff and students will receive annual training on data protection (GPDR) to ensure they understand the law and their rights.
- ✓ Parental or student consent will be sought where necessary for legal compliance.
- ✓ Age restrictions[1] surrounding data consent will be adhered to.

**Transparency**

- ✓ AI-generated content used in the classroom should be clearly labelled and attributed *[this serves to build trust, promote mutual disclosure of AI use and initiate meaningful dialogue between teachers and students].*
- ✓ Parents, students, and staff must be informed when AI is used to support teaching and decision-making.
- ✓ A central record of approved AI tools must be maintained and shared.
- ✓ The Trust's AI policy must be accessible and regularly updated.
- ✓ Feedback from stakeholders must be gathered to inform ongoing AI use.
- ✓ Staff must promote openness about when AI has been used including in planning, communication or assessment.

**Technical Robustness**

- ✓ Only tools that meet security and reliability standards may be used.
- ✓ AI tools must be regularly reviewed for safety, accuracy, and resilience.
- ✓ Staff must report data breaches, technical issues or errors in AI systems in a timely and effective manner.
- ✓ AI tools must be tested in controlled environments before full rollout.

[1] See Appendix for further details.

- ✓ Cybersecurity risks (e.g. hacking, impersonation) must be considered and minimised in all AI use.
- ✓ Safeguarding risks linked to AI (e.g. deepfakes, grooming) must be proactively addressed.
- ✓ Online filtering and monitoring systems must be kept up to date to ensure the highest level of data security.
- ✓ Appropriate oversight mechanisms are in place for data collection, storage, processing, and use.

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## Education & Training

Education and training are essential to ensure all stakeholders understand how to use AI ethically, safely, and effectively. Training will be tailored to each group's role and responsibilities and will reinforce the principle that AI should enhance—not replace— critical thinking, creativity, and problem-solving.

### Students

Students will be encouraged to think hard, use their own brains, and apply AI as a tool to support—not replace—their learning and problem-solving. Students will:

- Be prepared for changing workplaces.
- Learn how AI works, including generative AI, large language models (LLMs) and image generation.
- Include online safety teaching in the curriculum and how to protect against harmful or misleading content.
- Understand ethical issues such as bias, misinformation, plagiarism.
- Understand environmental impacts of AI and associated digital technologies and how they can impact wellbeing.
- Develop discernment in using AI to support learning, not shortcut it.
- Explore how AI can aid research, revision, creativity and problem solving.
- Recognise the risks of over-reliance on AI and how misuse can hinder learning.
- Raise awareness and understanding of protecting intellectual property rights.
- Encourage the safe and responsible use of digital content.
- At KS4 and KS5 understand the importance of the "student declaration of authenticity" required for all coursework/controlled assessment/NEA submissions, including the consequences of signing it falsely.

Training will be embedded throughout the curriculum but particularly within computing, PSHE, careers education and Form Time where appropriate.

### Staff

Staff will be empowered through training to make informed, critical decisions about when and how to use AI—ensuring it enhances teaching, reduces workload, and increases efficiency without compromising professional judgment or pedagogical intent.
Staff will:

- Receive training on approved AI tools and their safe, ethical use.
- Learn to critically evaluate whether AI should be used in a given context.
- Explore how AI can reduce workload while maintaining educational quality.
- Grow in confidence with their own use of AI systems and their ability to use them to enhance student learning.
- Learn to supervise student use of AI and guide them in responsible practices.

Training will be delivered through CPD sessions and digital learning modules.

### Parents

Parents will receive guidance to help them understand how AI can support their child's learning, while also recognising their responsibility to encourage independent thinking, ethical use, and safe, purposeful engagement with AI. Parents will:

- Be provided with information on how AI is used in school and how it can support learning at home.
- Learn about ethical use, risks of over-reliance, and how to monitor AI use at home.
- Encouraged to discuss AI with their children and promote responsible use that supports learning and development.

Training and awareness will be offered through parent evenings, newsletters, and online resources.

### Governors

Governors will be supported to understand their role in holding school leaders to account for delivering effective AI education and training to staff, students, and parents— ensuring it aligns with the Trust's values, safeguarding responsibilities, and strategic aims.
Governors will:

- Receive training on the strategic and ethical oversight of AI use in schools.
- Understand the risks, benefits, and legal responsibilities associated with AI.
- Learn how to evaluate the impact of AI on learning, safeguarding, and data protection.

Training will be delivered through governance briefings and policy review sessions.

### School & Trust Leaders (including SLT / Digital Lead)

School and Trust Leaders are responsible for ensuring that their schools deliver high quality education and training on AI to all stakeholders—aligning with the policy's objectives to promote

safe, ethical, and purposeful use of AI across teaching, learning, and operations. School and Trust leaders will:

- Understand the strategic, ethical, environmental and legal responsibilities of AI use in education.
- Lead on the implementation of AI tools in line with identified curriculum goals and workload efficiencies.
- Ensure staff, students, and parents receive appropriate training and support.
- Involve students and their parents in decisions about the use of AI and digital technologies in school.
- Evaluate the impact of AI on learning, safeguarding, and operational effectiveness.
- Oversee the approval process for new AI tools, including DPIAs and safeguarding checks.

Training will be delivered through collaborative work, CPD sessions and digital learning modules.

## Societal and Environmental Wellbeing

### Our Commitment

Our Trust is committed to using AI and data technologies in a way that promotes societal and environmental wellbeing. We understand that these technologies have the potential to impact not only our community but also the broader society and environment.

### Promoting Societal Wellbeing

We strive to use AI and data technologies in a way that benefits society.

This includes:

- Ensuring that the use of these technologies does not harm individuals or society.
- Considering the social and emotional wellbeing of learners and teachers in the use of these technologies.
- Involving students and their parents in decisions about the use of these technologies.
- Using data to support teachers and school leaders in evaluating student wellbeing and monitoring this use.

### Promoting Environmental Wellbeing

We are mindful of the environmental impact of AI and data technologies. We strive to use these technologies in a way that is sustainable and environmentally friendly. This includes considering the energy use of these technologies and seeking ways to minimise their environmental footprint.

## Implementation

Implementation of all AI tools will be carefully considered in three phases.

### Pilot Phase

- AI tools are first tested in a controlled environment, with risks and benefits carefully considered.

### Roll Out Phase

- Full implementation follows a successful pilot, with evaluation of outcomes.
- All relevant staff (not just teaching staff) receive appropriate training.

### Review Phase

- Ongoing monitoring and review ensure AI tools remain effective and safe.
- Feedback from students, staff, and parents will be gathered to assess the benefits and limitations of AI in enhancing the curriculum and/or reducing workload.
- Adjustments and improvements will be made based on evaluation findings to ensure the optimal integration and utilisation of AI in line with the Trust's aims and the evolving needs of the curriculum and/or support services.

## Accountability

### Trust Leaders

- Set the strategic direction for AI use and ensure compliance across all schools.
- Facilitate collaboration across schools to share best practice and promote consistency.
- *Example: Approving the Trust-wide AI policy and ensuring regular reviews.*

### School Leaders (including SLT / Digital Leads)

- Approve and monitor AI initiatives within their school.
- Ensure staff are trained and AI use aligns with school aims and safeguarding.
- Ensure the curriculum teaches students about AI, including:
    - What AI and generative AI are, including LLMs, NLPs and image generation from LLMs.
    - Ethical issues such as bias, plagiarism, and misinformation (at KS4-5 this will include specific information on the use of AI in NEAs and exam board malpractice processes and consequences). o Data security, privacy, consent and their rights o How AI can support learning (e.g. research, revision, creativity).
- How AI can be misused and potentially hinder learning or safety.
- Support parents in understanding AI including how their children can use AI to enhance learning; ethical use and the negative impacts of becoming over reliant on AI.
- *Example: Introducing a short section on AI into parent information evenings.*
- *Example: Embedding AI literacy into computing, PSHE, or digital citizenship lessons; Overseeing the rollout of a new AI tool and ensuring all staff complete training.*

**Data Protection Officer (DPO) or School Based Data Protection Officer**

- Vet AI tools for UK GDPR and data protection compliance; advise on privacy risks and respond to breaches.
- Support school leaders in safely trialling and exploring AI tools.
- *Example: Conducting a Data Protection Impact Assessment (DPIA) before a new AI tool is adopted.*

**Designated Safeguarding Lead (DSL)**

- Monitor and advise on safeguarding risks related to AI; respond to safeguarding incidents involving AI.
- *Example: Updating staff on new safeguarding risks linked to AI, such as deepfakes.*

**IT Hub/Network Manager**

- Ensure AI tools are technically robust, secure, and integrated safely into the school's IT infrastructure.
- *Example: Testing and approving the technical deployment of an AI-powered learning platform.*

**Staff**

- Use only approved AI tools, supervise student use, and report concerns or incidents.
- *Example: Checking AI-generated lesson content for accuracy before using it in class.*

**Students**

- Use AI tools responsibly and ethically, following school guidelines, report misuse or concerns.
- *Example: Citing the use of any AI-generated content used in homework assignments.*

**Parents**

- Stay informed about how AI is being used both in their child's education and outside of school.
- Raise concerns with school leaders if needed.
- Take full responsibility for monitoring the use of AI at home; ensuring it is used in a discerning manner and with integrity.
- *Example: Attending an information session about AI use in the curriculum. Ensure AI is not being used to complete homework (unless the task encourages it).*

### Governors

- Hold school leaders accountable for safe and effective AI use.
- *Example: Reviewing and approving the annual evaluation of AI's impact on learning and safeguarding.*

## Misusing AI Tools – At Secondary & Post-16 Level

### Preventing Misuse (by students)

Misuse of AI tools can happen both accidentally and intentionally. Alongside education and training of the above-mentioned stakeholders, schools will consider taking the following actions to prevent the misuse of AI tools:

- Restricting access to online AI tools on school devices and networks, especially on devices used for exams and assessments.
- Setting reasonable deadlines for submission of work and providing students with regular reminders.
- Allocating time for sufficient portions of students' work to be completed in class under direct supervision, where appropriate.
- Examining intermediate stages in the production of students' work to ensure that work is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages.
- Introducing classroom activities that use the level of knowledge and understanding achieved during lessons to ensure the teacher is confident that students understand the material.
- Engaging students in verbal discussions about their work to ascertain that they understand it and that it reflects their own independent work.
- Refusing to accept work that is suspected to have been generated through misuse of AI tools without further investigation and sanction where appropriate.
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models.
- Ensure students receive and understand the JCQ "Information for Candidates" documents for NEAs and coursework, which outline expectations for authenticity and referencing.

### Identifying Misuse (by students)

Staff members will continue to use the skills and observation techniques already in use to assure themselves that students' work is authentically their own when attempting to identify a misuse of AI tools. When reviewing students' work to ensure its authenticity, especially for coursework/NEA, staff members will need to be aware of, and look out for, potential indicators of AI use, which include:

- A default use of American spelling, currency, terms and other localisations.

- A default use of language or vocabulary which might not appropriate to the working/qualification level or individuals' ability.
- A lack of direct quotations and/or use of references where these are required or expected.
- Inclusion of references which cannot be found or verified.
- Inconsistent or missing references to sources, especially where referencing is expected or required by the subject specification.
- A lack of reference to events occurring after a certain date, reflecting when an AI tool's data source was compiled.
- Instances of incorrect or inconsistent use of first-person and third-person perspective where AI generated text has been left unaltered.
- A variation in the style of language evidenced in a piece of work, if a student as taken specific portions of text from an AI tool and then amended it.
- A lack of graphs, data tables or visual aids where these would normally be expected.
- A lack of specific, local or topical knowledge.
- Content being more generic in nature.
- The inadvertent inclusion of warnings or provisos produced by AI tools to highlight the limits of its ability or the hypothetical nature of its output.
- The submission of pupil work in a typed format, where this is not usual, expected or required.
- The unusual use of several concluding statements throughout the text, or several repetitions of an overarching essay structure within a single lengthy essay.
- The inclusion of confidently incorrect statements within otherwise cohesive content.

Staff members will remain aware that AI tools can be instructed to employ different languages and levels of proficiency when generating content, and some are able to produce quotations and references.

Where necessary, the school may make use of programmes and services that are able to analyse content and determine the likelihood that it was produced by AI, such as:

- OpenAI Classifer
- GPTZero
- The Giant Language Model Test Room (GLTR)
- Grammarly
- Turn It In

### Public Examinations & Assessments

The school will continue to take reasonable steps to prevent malpractice involving the use of generative AI, following the directives of the examining bodies, the JCQ, Ofqual and DfE.

The Exams Officer will ensure that the school website and/or exam/NEA policy documents address appropriate and inappropriate use of AI tools with regard to examinations and NEAs.

Students will be made aware of the appropriate and inappropriate uses of AI tools prior to commencement of any NEA, and the consequences of its misuse. Students will be made aware that it is not acceptable to submit work that has been produced with an AI tool, and of the school's approach to plagiarism and malpractice. Students will also be made aware of the risks of using AI tools to complete exams and assessments, which include:

- Submitting work that is incorrect or biased.
- Submitting work that provides dangerous and/or harmful answers.
- Submitting work that contains fake references.
- Submitting work that is not 100% their own (which is deemed as plagiarism)

Students will only be permitted to use AI tools to assist with assessments where the conditions of the assessment permit the use of the internet, and where the student is able to demonstrate that the final submission is the product of their own independent work and thinking. Staff will provide adequate guidance and support for students on the use of AI in assessments and what will be deemed as misuse.

AI-generated content must be clearly acknowledged and referenced if used during permitted stages of NEAs or coursework. However, students must understand that AI generated content alone cannot be credited, as it does not demonstrate independent understanding.

Teachers must not use AI tools as the sole marker of student work. All marking must be based on professional judgment and assessment criteria.
Centres must have a malpractice policy that explicitly addresses AI use, including what constitutes misuse, how it should be acknowledged, and the consequences of malpractice.

## Linked Policies

The following school level policies should be read in conjunction with this policy.

- Child Protection and Safeguarding Policy
- Behaviour Policy
- Acceptable Use of IT Policy
- Online Safety Policy
- Mobile Phone Policy
- Staff Code of Conduct
- Examinations / NEA Policies including Malpractice Policy
- Data Protection Policy
- Privacy Notices

## Appendix 1

# Age Restrictions

The following information is taken from the UK GDPR regulations, summarising the key considerations with regards to AI and consent.

| Age | Key Considerations | Consent Requirements | Notes |
|---|---|---|---|
| **Under 18** | All individuals under 18 are considered children.<br>Data must be processed fairly, transparently, and securely. | Must be given special protection when processing personal data.<br>Consent is only one lawful basis for collecting/processing data—others may be more appropriate. | Children have the same rights as adults to access, rectify, erase, and object to processing.<br>Automated decision making that significantly affects children should be avoided. |
| **0–12 years** | Considered a child under UK GDPR. | Parental consent required for online services relying on consent. | Must ensure parental responsibility is verified. |
| **13–17 years** | Still considered a child under UK GDPR. | Can provide their own consent for online services (ISS) relying on consent. | Organisations must ensure clear, age-appropriate privacy notices and education that empowers young people to make sensible decisions regarding data sharing. |