



# Lady Manners School

## Artificial Intelligence (AI) Policy

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***Through our shared school values, we aim for all students to thrive, feel included and aspire to grow as individuals who contribute to society with empathy, integrity and positivity.***

This document will be reviewed annually by the Governors' Curriculum and Students Committee and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here: <https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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### 1. Introducing our Artificial Intelligence Policy

- 1.1 Artificial Intelligence (AI) technology is already widely used in both commercial and everyday applications, and its influence is anticipated to grow exponentially, impacting almost all industries and job sectors including education. Generative AI refers to technology that can be used to create new content based on large volumes of data that models have been trained on from a variety of works and other sources. Generative AI is a rapidly evolving and increasingly freely available technology generating writing, audio, codes, images and video simulations. Whilst this offers opportunities for schools and their students, it also increases risk.
- 1.2 AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. This policy establishes guidelines for the responsible and effective use of AI within our School. By embracing AI technology, we aim to:
- Enhance academic outcomes and educational experiences for students
  - Support teachers in managing their workload more efficiently and effectively
  - Educate staff and students about safe, responsible and ethical AI use
  - Incorporate AI as a teaching and learning tool to develop staff and students' AI literacy and skills
  - Prepare staff and students 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
  - Improve and streamline school operations to minimise cost and maximise efficiency.

- 1.3 All users of AI will comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We will prioritise the safeguarding of our students and their online safety and will not knowingly use any AI technology that puts their safety or privacy at risk. Staff will not allow or cause intellectual property, including students' work, to be used to train Generative AI models without appropriate consent or exemption to copyright.
- 1.4 We recognise that the technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. We recognise the leadership in the education sector provided by the Department of Education and the guidance set out in their [Statement on Generative Artificial Intelligence in Education](#). This AI policy has been informed by that guidance. As guidance and technology changes the policy therefore will need to remain under regular review. This policy will therefore be reviewed annually.
- 1.5 We will be transparent and accountable about the use of AI technology so that stakeholders, including staff, students, parents and other partners understand where and how AI is used and who is responsible. Any stakeholder feedback or questions about the use of AI will be considered and responded to appropriately.
- 1.6 By adhering to this policy, we aim to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all involved.

## **2. Equalities Statement of Intent**

Lady Manners School welcomes a diverse population of both students and staff. In order to consolidate and build upon this diversity, equality of opportunity and the absence of unfair discrimination is at the core of all the school's activities. The school will not unfairly discriminate in the recruitment or general treatment of staff or students.

The school is committed to promoting and developing equality of opportunity in all its functions and will seek to do this by:

- communicating its commitment to equality and diversity to all members of the school community;
- maintaining systems for implementation, monitoring, evaluation and review;
- treating acts of discrimination and other contraventions of this policy as a disciplinary offence.

The Governing Board has responsibility for ensuring that the school operates within the legal framework for equality and for implementing the policy throughout the school. In addition, each member of the school community is responsible for preventing unfair discrimination or harassment or victimisation which it is within their

control to prevent; and challenging or reporting such inappropriate behaviour if it occurs.

### **3. Scope and Responsibilities**

- 3.1 This Policy applies to all staff, including temporary staff, consultants, governors, volunteers, and contractors, and anyone else working on our behalf. It is also applicable to students, but this group will require support and guidance from staff as part of their learning.
- 3.2 All staff are responsible for reading and understanding this policy before using any AI technology.
- 3.3 All leaders are responsible for ensuring their staff team read and understand this policy before using AI technology and that they follow this policy, including reporting any suspected breaches of it.
- 3.4 There are a number of staff in the school who are key contributors to AI policy and development:
  - Miss J Picknell (Deputy Headteacher) and Mrs K Mortimer (TLR3 holder for Enhancing QFT through Technology), act as leads for our school regarding the use of AI technology, monitor compliance with this policy and work with other staff to communicate, promote and regulate AI use, providing or arranging for training to be given where necessary.
  - Our Data Protection Officer is responsible for advising us about our data protection obligations in relation to AI use.
  - Our Network Manager provides technical support and guidance on the operation of AI.
  - The Governing Board will be responsible for the governance of AI.
- 3.5 Training will emphasise how AI can augment staff roles, providing them with more time and resources to focus on tasks such as personalised instruction, student engagement, and critical thinking.
- 3.6 By combining the benefits of AI technology with professionals' expertise, experience, and professional judgment, we can create a collaborative and effective educational environment that maximises the benefits of both human and AI capabilities.
- 3.7 This policy also links to other school policies, including the Data Protection Policy, IT Security and Acceptable Usage Policy, Homework Policy and Examination Policy and should be read in conjunction with them.

### **4. Use of AI by Staff**

- 4.1 Staff are permitted to explore and utilise AI-based tools and technologies to assist in managing their work. Examples of such tasks may include marking and feedback, report writing, lesson planning, professional development and

facilities management. AI can provide valuable support while still incorporating professional judgment and expertise.

- 4.2 AI tools will be used responsibly, ensuring they complement staff professional judgment and expertise, without replacing them.
- 4.3 Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used.
- 4.4 Staff will receive appropriate training and support to effectively integrate AI into their work including professional development opportunities focused on AI tools and their effective integration into school administrative and teaching practices. Training and support will be planned as part of staff personal development reviews and appraisals or on an as-needed basis. Staff have a responsibility to identify any training and development needs to ensure they adhere to this policy and should discuss these with their line manager.
- 4.5 AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, AI-based platforms can suggest specific topics or learning activities. Teaching staff are permitted to use these suggestions as a starting point, incorporating their professional expertise to customise the lesson plans and make necessary adjustments to ensure student learning objectives are met.
- 4.6 AI tools can be utilised to automate certain aspects of marking of student work, such as multiple-choice or fill-in-the-blank assessments. Teaching staff can use AI-powered marking software to speed up scoring fact-based responses to objective questions, providing more time to support students individually.
- 4.7 Teaching staff can also use AI to identify areas for improvement in more subjective written answers. Teaching staff will review and verify AI-generated marks or feedback to ensure accuracy, and add their professional judgment, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.
- 4.8 Teaching staff can also support students to gain feedback on their work themselves using AI, replicating peer assessment processes. This will allow students to receive instant personalised and valuable feedback and improvement strategies on their work, helping to identify misconceptions and gaps in knowledge, as well helping them develop more structured or creative writing. It is important that teaching staff play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.
- 4.9 Teaching staff can use AI to assist in writing student reports, ensuring accuracy and efficiency while maintaining their professional judgment. Where AI has been used to support with report writing, the staff member will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.

- 4.10 Staff can use AI as a starting point to gather relevant information and identify patterns in student attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each student's progress. By using AI responsibly in student progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on students' academic achievements and overall development.
- 4.11 Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws.
- 4.12 An AI factsheet for staff is available as **Appendix 1** and is also in the staff handbook.

## **5. Use of AI by Students**

- 5.1 As part of child protection and safeguarding policies and processes, the school will ensure that its students will continue to be protected from harmful content online, including that which may be produced by AI technology and that any AI tools used are assessed for appropriateness for individual students' age and educational needs. We will ensure that staff are aware of the risks of AI which may be used to generate harmful content including deepfake and impersonation materials.
- 5.2 Students will be permitted to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis, and creative expression.
- 5.3 A culture of responsible AI use will be fostered through engaging students in conversations about data privacy, bias, safeguarding, and the social impact of AI applications.
- 5.4 Students will be taught not to enter personal, sensitive or confidential data into Generative AI tools including their personal email addresses.
- 5.5 AI education will be incorporated into the curriculum to provide students with an understanding of AI's capabilities, limitations, and ethical implications. Guidance will be provided on identifying reliable and trustworthy AI sources and evaluating the credibility and accuracy of AI-generated information.
- 5.6 AI tools and technologies will be integrated into teaching and learning activities across various subjects and year groups, providing students with hands-on experience and opportunities to develop AI literacy and skills.

## **6. Potential Misuse of AI**

- 6.1 Students will receive education on responsible and ethical AI use, including the potential risks and consequences of relying solely on AI tools to complete

assignments, coursework, or homework. Students will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.

- 6.2 Teaching staff will emphasise the importance of critical thinking, creativity, and originality in student work, discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations will be communicated to students regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.
- 6.3 Key messages are delivered in Computing lessons and the Year 8 skills programme, and re-emphasised in all subjects where students are completing work for external grading.
- 6.4 The school will follow and adhere to any rules or guidance on the use of AI in assessments given by the Joint Council for Qualifications or individual Exam Board requirements see <https://www.icq.org.uk/exams-office/malpractice/artificial-intelligence/> and <https://www.icq.org.uk/exams-office/blogs/updated-the-jcq-guidance-on-ai-use-in-assessments/> for further information.
- 6.5 Teaching staff will employ various assessment methods to evaluate student understanding and ensure that they have genuinely grasped the subject matter. This may include class discussions, oral presentations, practical demonstrations, written reflections, and project-based assessments. By utilizing diverse assessment strategies, teaching staff can verify students' comprehension beyond what AI tools can assess, promoting deep learning and authentic student engagement.
- 6.6 Teaching staff will educate students on the potential misuse of AI by those seeking to deceive or trick students into actions that they would otherwise not contemplate, for example interaction with others who are not who they claim to be but who can imitate who they claim to be using AI technology.

## 7. Ethical Use of AI

- 7.1 The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Whether staff are using AI for teaching or school administrative purposes, or with students who will make use of this technology, they should be mindful of, and instruct students about, the following considerations:
  - 7.1.2 Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socioeconomic background.
  - 7.1.3 Accuracy - information may be inaccurate when generated so any content should be fact-checked.

7.1.4 Currency - some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

## 8. Data Protection implications of using AI

- 8.1 Staff and students should be aware that any information entered into a Generative AI model is no longer private or secure. Staff and students must not enter any personal information (personal data, intellectual property or private information, including commercially sensitive information, such as contracts) into any Generative AI model. Staff should make themselves aware of and inform students about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.
- 8.2 Staff who wish to utilise AI tools must ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required and follow the school Data Protection Policy and Data Protection Impact Assessment Process.
- 8.3 When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out.
- 8.4 Any DPIA or assessment of the data protection aspects of the use of AI will include:
- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.
  - What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.
  - A clear indication where AI processing and automated decisions may produce effects on individuals.
  - Consideration of both individual and allocative harms (for example, where the harm results from a decision to not permit a student to take a certain subject at GCSE or A Level) and representational harms (for example, selecting groups of students for different interventions results in gender or racial bias).
  - How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.
  - An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
  - If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy in order to justify the use of the AI tool in the DPIA.
  - If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
  - Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
  - The potential impact of any security threats.



- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders.
- Whether processing is intentionally or inadvertently processing special category data- there are many contexts in which non-special category data is processed, but infers special category data (for example, where a postcode infers a particular race).
- A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

## **9. Cyber Security**

9.1 Our school will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to the Data Protection Lead, the Network Manager and Data Protection Officer.
- Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.
- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and students to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

## Appendix 1

### Lady Manners School: Artificial intelligence (AI) in school Factsheet

#### T & L Principles

AI has potential as a tool for learning; it is not a replacement for teaching. The 'buzz' of the classroom (a social environment) is part of learning. Teaching the curriculum to young people requires far more than delivery of knowledge: a teacher uses many skills and kinds of understanding to connect with their students. A government DfE blog states: 'Teachers are irreplaceable, and AI could never be a substitute for teachers' professional judgement and the personal relationship they have with their students.'<sup>1</sup>

#### AI isn't new but now it brings new challenges

Artificial intelligence (AI) is the use of computer systems to solve problems and make decisions. It's already a part of everyday life - such as personalised suggestions on social media, shopping sites or route-planning apps.

However, the technology is developing rapidly and throwing up many new applications and challenges for schools. For example, we are familiar with students copying and pasting internet content and we are good at using search engines to trace it and prove their plagiarism; now it may be more difficult to detect this kind of cheating.

Using AI is already part of our lives. Many of our students are familiar with AI chatbots and already interact with them with ease. They are, however, less familiar with related issues such as data protection, reliability and the differences between AI tools.

In July 2023 the Russell Group universities drew 5 guiding principles: 'The five guiding principles state that universities will support both students and staff to become AI literate; staff should be equipped to help students to use generative AI tools appropriately; the sector will adapt teaching and assessment to incorporate the "ethical" use of AI and ensure equal access to it; universities will ensure academic rigour and integrity is upheld; and share best practice as the technology evolves.'<sup>2</sup>

If we are to prepare our students for the future, some engagement with AI, in our learning environment, will be necessary - particularly for the sixth form.

#### What's generative AI?

Generative AI takes a written prompt and runs it through an algorithm to generate new, 'natural'-seeming content. Tools include:

- Chatbots such as ChatGPT, Google Gemini and Grammarly GO, which generate text
- Text-to-image programs like DALL-E and Midjourney, which create images

AI tools are still being developed. They have limitations such as producing biased, inaccurate or inappropriate content. Some AI chatbots can produce fake references. A

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<sup>1</sup> <https://educationhub.blog.gov.uk/2023/12/06/artificial-intelligence-in-schools-everything-you-need-to-know/>  
Accessed 09-04-24

<sup>2</sup> <https://russellgroup.ac.uk/news/new-principles-on-use-of-ai-in-education/> Accessed 09-04-24

limitation of ChatGPT was that its training data cut off in 2021; now it is later (GPT 3.5 is January 2022 & GPT-4Turbo is April 2023).<sup>3</sup>

Chatbots are familiar and easily accessible to most of our students - for example on Snapchat. It is easy to ask an AI copilot to help you with your homework.

## Policies

Please see the following policies which reference AI:

- The AI Policy
- The Examinations Policy: The [Joint Council for Qualifications](#) classifies AI misuse - where a student submits AI-written work as their own - as malpractice. We have updated our definitions of plagiarism to make this clear. In October 2023 all KS4 and KS5 students, and curriculum leaders, were sent a digital copy of the JCQ NEA Information for Candidates, updated to include AI chatbots (p 3).<sup>4</sup>
- Homework Policy

## Explain our rules on AI use to students

Students should know that using AI without crediting it is not allowed in exams, coursework or any work that's internally assessed to count towards a qualification. Students should be reminded of this when they have exams and coursework coming up. This is more likely to be the case for vocational subjects and the Sixth Form curriculum. Some of our students are already using AI for NEA: Computer Science A level students use software that has AI built in to create code. This makes it even more important that staff provide clarity and guidance on what is and is not acceptable.

For coursework subjects, teachers can have an open dialogue with students about how and when AI tools can be used to support learning, and when it shouldn't be used. JCQ have produced excellent resources for students and staff about AI and Assessments.<sup>5</sup> These will be available on Moodle for staff use on the Teaching and Learning page.

In the interests of transparency and setting a good example, teachers should be open about when they have used AI tools for lessons.

The ethics of AI tools is a topic covered in the GCSE ICT course.

Using AI-generated content for learning can develop students' critical skills by helping them make judgements on style, content, reliability and trustworthiness.

Where possible, teachers should support students to find age-suitable tools and resources and use them appropriately, without relying on them too much (DfE policy paper, page 5) Teachers might:

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<sup>3</sup> Cut-off dates checked 02.07.24

<sup>4</sup> [https://www.jcq.org.uk/wp-content/uploads/2023/08/IFC-NE\\_Assessments\\_2023\\_FINAL.pdf](https://www.jcq.org.uk/wp-content/uploads/2023/08/IFC-NE_Assessments_2023_FINAL.pdf)

<sup>5</sup> <https://www.jcq.org.uk/wp-content/uploads/2024/02/JCQ-AI-poster-for-students-2.pdf>  
<https://www.jcq.org.uk/wp-content/uploads/2024/02/JCQ-AI-information-sheet-for-teachers-1.pdf>  
<https://www.jcq.org.uk/media-centre/jcq-videos/>

- Use a KS3 PSHE or computing lesson to teach students how and when to use an appropriate tool
- Recommend to students AI tools which provide their sources (rather than a general statement about trustworthiness)
- Discuss the issue if a student brings it up in class or submits AI-generated work

### **Never enter sensitive information into an AI tool**

We continue to follow our data protection principles and rules and we are aware that any text entered into an AI tool is potentially being made public. If you're using AI for any reason, don't enter any personal or sensitive data.

Our school may also be targeted by fraudulent emails, such as 'phishing attacks', which are AI-generated and very convincing. Look out for the following signs:

- Email addresses that don't match the contact details you have on file
- Poor spelling and grammar, including American spellings, or an overly formal tone
- Messages demanding urgent, time-sensitive action
- Suspicious links, for example containing strings of numbers
- Generic introductions (e.g. Dear Sir or Madam)

Report any suspicious emails to our GDPR Lead, Jo Picknell.

### **AI could save time ...**

If AI genuinely cuts down on workload, it could help in these suggested ways:

- Create a comment bank to use when writing reports
- Come up with ideas for charity fundraising activities
- Quickly write quiz questions to check students' knowledge
- Analyse mock results for targeted follow-up revision lessons
- Help with standardisation of marking

### **... but it's not always reliable ...**

AI tools are only as accurate as the information they are trained on. They may generate responses that are incorrect, biased, or inappropriate.

Many tools are based on a defined set of information, so won't be able to accurately give you answers about information that has changed after their data was inputted - for example, statutory policy requirements or current events.

Classifiers like the OpenAI text classifier can help detect AI-generated content but are of limited use (they will produce false negatives and false positives, for example).

### **... so it's important to check all AI-generated results carefully**

You can use AI tools as a starting point, but you should always check and adapt the results so they are:

- Taking the best interests of staff, students and the school into account
- In line with our school policies, procedures and guidelines that cover generative AI:

- Plagiarism Policy
- IT security and Acceptable Use Policy
- Homework Policy

### **Ofsted and AI**

If we choose to use AI, Ofsted expects us to:

- Make sure our AI solutions are safe and secure, and protecting users' data
- Be transparent about the school's use of AI and make sure we understand the suggestions it makes
- Use AI only when it's ethically appropriate to do so
- Closely monitor the AI we use for bias
- Identify and correct any bias or problems, where appropriate
- Give staff clear roles in monitoring, evaluating, maintaining and using AI tool
- Make sure that staff are empowered to correct and overrule suggestions made by AI
- Respond appropriately to any concerns, or complaints about errors made by AI