

Artificial Intelligence (AI) Policy

Archbishop Tenison's CoE High School

Contents

1. Aims and Scope
 2. Legislation
 - 3a. Regulatory Principles
 - 3b. Church School Principles
 4. Roles and Responsibilities
 5. Staff and Governors' Use of AI
 6. Educating Pupils About AI
 7. Use of AI by Pupils
 8. Formal Assessments
 9. Staff Training
 10. Referral to our Child Protection and Safeguarding Policy
 11. Breach of this Policy
 12. Monitoring and Transparency
 13. Links with Other Policies
- Appendix 1: Approved Uses of AI

Artificial Intelligence (AI) Policy

Introduction

As a Church of England school, our approach to artificial intelligence is grounded in the conviction that every person is made in the image of God and therefore possesses inherent dignity, worth and purpose. AI must always serve people, supporting rather than replacing the relationships, wisdom and compassion at the heart of Christian education. This reflects our commitments in Section 3b, ensuring that technology strengthens authentic human encounters and never substitutes pastoral care, spiritual formation or discernment.

Our theological ethos calls us to uphold dignity, fairness, inclusion and community; therefore, AI should promote belonging, reduce inequality and avoid reinforcing bias or stereotypes. We are guided by values of truth, discernment and responsibility, helping pupils evaluate information critically and ethically.

Finally, our commitment to holistic flourishing and stewardship includes caring for God’s creation. Responsible, sustainable and environmentally aware use of AI—minimising unnecessary digital consumption and understanding its resource impact—is a fundamental part of our policy thinking, ensuring AI benefits wellbeing without shaping spiritual identity or conscience.

1. Aims and Scope

At Archbishop Tenison's CoE High School, we recognise that artificial intelligence (AI), including generative AI, is rapidly transforming education and society. Used well, AI can enhance teaching, improve efficiency, offer personalised learning opportunities, and support staff wellbeing by reducing administrative burdens. These opportunities are consistent with our commitment to helping every pupil flourish academically, personally, and spiritually within a Christian community rooted in love, compassion and respect.

However, we also acknowledge that AI introduces risks, including concerns relating to data protection, copyright, safeguarding, misinformation, ethical considerations, and compliance with UK GDPR and other legal duties. AI may produce inaccurate, biased, or incomplete content, and it may store or learn from information entered into it.

This policy aims to:

- Support effective teaching and learning, enabling staff to use AI as a tool that enhances, not replaces, professional expertise.
- Promote ethical, safe and responsible use of AI by all members of the school community.
- Reduce workload and improve staff efficiency by encouraging appropriate exploration of AI tools that support planning, administration, and professional tasks.
- Prepare pupils and staff for a future in which AI is embedded across society, ensuring digital literacy, critical thinking, and discernment.
- Promote equity and inclusion, ensuring that AI is used to support diverse learning needs and narrow gaps, not widen them.
- Ensure compliance with all statutory responsibilities, including GDPR, safeguarding legislation, data protection duties, and equality obligations.

Scope: This policy applies to all staff, governors, volunteers, contractors, pupils (according to the approach chosen by the school—see Section 7), and visitors or partners who use school-approved systems or devices. It covers all generative AI tools and any use of AI on school devices or personal devices used for school work. Staff must distinguish between open AI tools (public services that may learn from inputs) and closed AI tools (controlled environments with higher levels of data protection). No personal or identifiable data may be entered into any AI tool unless its use has been formally approved and assessed for data security.

2. Legislation

The use of AI at Archbishop Tenison's CoE High School is governed by national guidance and law. We align with the UK Government's AI Regulation White Paper and the DfE guidance on Generative AI and Data Protection in Schools. We comply with UK GDPR and the Data Protection Act 2018. All AI use must align with safeguarding duties under Keeping Children Safe in Education (KCSIE). AI use must respect copyright and pupils' intellectual property, and support duties under the Equality Act 2010. No AI tool may process personal data unless appropriately scrutinised and approved; staff must understand differences between open and closed tools and default to anonymisation.

3a. Regulatory Principles

We follow five regulatory principles that guide all AI use in school:

- 1) Safety, security and robustness — protect data, prevent unauthorised access, identify and mitigate risks, and safeguard against misuse.
- 2) Appropriate transparency and explainability — be open about where AI is used; staff must understand and explain AI-influenced decisions; avoid over-reliance.
- 3) Fairness — consider potential bias before adopting tools; check outputs for stereotyping or discriminatory effects; act to correct issues.
- 4) Accountability and governance — define clear roles (leaders, governors, DPO, DSL, AI Lead) and ensure human responsibility for all decisions.
- 5) Contestability and redress — enable staff, pupils and parents to raise concerns; prioritise human judgement over automated outputs.

3b. Church School Principles

As a Church of England school, we affirm the God-given dignity of every person and commit to living together in love, compassion and respect. Technology must serve people and community. AI is a tool; it can never replace human relationship, spiritual formation or moral responsibility. We therefore commit to the following principles.

PRINCIPLE	WE WILL...
Human-Centred and Spirit-Led Education	<ul style="list-style-type: none">- AI can support teaching and learning, but trusted adults remain central to pastoral care, spiritual guidance and relational support.- AI must never replace or simulate spiritual discernment, prayer, mentoring or worship.- AI should strengthen, not weaken, authentic human encounters.

Dignity and Christian Ethos	<ul style="list-style-type: none"> - Use AI in ways that uphold dignity, wisdom and compassion. - Technology must serve people; staff use AI with integrity and accountability. - AI should support human flourishing, not diminish agency or responsibility.
Belonging, Inclusion and Community	<ul style="list-style-type: none"> - Use AI to strengthen inclusion so every pupil feels known and valued. - Avoid uses that create digital dependency or weaken real-world community. - Stay alert to AI systems reinforcing bias or stereotypes.
Empowerment, Discernment and Truth	<ul style="list-style-type: none"> - Teach pupils to use AI critically and ethically. - Verify information; address misinformation and ‘hallucinations’. - Promote intellectual honesty and responsible digital citizenship.
Holistic and Spiritual Flourishing	<ul style="list-style-type: none"> - Use AI to free time for creativity, reflection, mentoring, pastoral care and worship. - AI must not shape spiritual identity or conscience; formation is relational. - Support sustainable workloads and wellbeing for staff.
Safeguarding, Truth and Wellbeing	<ul style="list-style-type: none"> - Protect children’s safety, dignity and privacy when using AI. - Review AI-generated materials for accuracy, safety and suitability before use with pupils. - Do not use AI to generate prayers, sermons or pastoral responses for pupils.
Ethical and Responsible Use	<ul style="list-style-type: none"> - Ground decisions in Christian ethics and professional judgement. - Recognise AI has no consciousness, empathy or moral awareness.

	- Apply ethical reflection and human oversight to every use.
Justice and Fairness	- Promote fairness and reduce inequality. - Identify and challenge bias in AI outputs; review tools regularly.
Environmental Responsibility	- Consider sustainability and resource impact when adopting AI. - Avoid unnecessary or wasteful use.
Transparency and Collaboration	- Communicate openly about AI use with staff, families and governors. - Consult the community; review practice continuously.

4. Roles and Responsibilities

Clear roles ensure accountable, ethical AI use across the school.

4.0 AI Lead (Senior Assistant Headteacher) - coordinates proposals for new AI tools, maintains and updates the approved tools register, promotes safe and workload-reducing practice across the school, and supports staff with training, DPIAs and anonymisation processes, consistently modelling and upholding the school's theological and ethical principles.

4.1 Governing Board — Provides strategic oversight; requires approved tools only, attribution and fact-checking; and reviews the policy at least annually. Foundation governors and church personnel monitor the ethical use of AI through the policy and practices.

4.2 Headteacher — Leads implementation within a church school setting, ensuring theological and ethical principles are upheld; ensures staff and pupils receive training on AI benefits and risks; works with the DPO and DSL; approves new tools following consultation and, where needed, a DPIA; reviews policy annually.

4.3 Data Protection Officer (DPO) — Advises on GDPR compliance, privacy-by-design and DPIAs; guides breach management.

4.4 Designated Safeguarding Lead (DSL) — Monitors emerging AI risks, updates staff training, leads responses to incidents in line with safeguarding policy, and

advises on filtering and monitoring.

4.5 All Staff — Understand and uphold the theological and ethical principles behind the use of AI in the school; use only approved tools; understand open vs. closed systems; anonymise by default; attribute and fact-check outputs; report concerns; never upload protected documents unless authorised; never generate impersonating, explicit or discriminatory content; sign any required AI agreement.

4.6 Pupils — Follow Section 7; attribute any permitted AI use; never use AI to impersonate, bully or generate explicit content.

5. Staff and Governors' Use of AI

Archbishop Tenison's CoE High School encourages thoughtful, ethical AI use to enhance teaching and reduce workload while keeping human judgement at the centre.

5.1 Approved Use — Staff/governors may use AI for planning, resource creation, administration and professional communication. AI never replaces professional judgement; the user remains responsible for accuracy, quality and suitability. Consider whether AI is the right tool for each task.

5.2 Approval process — New tools/uses must be discussed with the Headteacher/AI Lead, reviewed with the DPO as needed, undergo a DPIA where required, and be added to the Approved AI Use Register. Only approved tools may be used.

5.3 Data protection and anonymisation — Do not enter personal/sensitive data into AI tools unless explicitly approved for that purpose. Default to anonymisation and minimal data. Uploading internal/confidential documents is prohibited unless assessed as data-secure. Any accidental entry of personal data into unauthorised tools will be treated as a data breach.

5.4 Intellectual property — Pupils own their IP. Do not upload pupil work or copyrighted materials unless permitted. Seek guidance if unsure.

5.5 Bias, accuracy and misinformation — Fact-check all outputs; review for bias and fairness; report concerns.

5.6 Raising concerns — Report concerns about inappropriate uses, harmful outputs or safeguarding risks to the Headteacher/AI Lead and DSL as appropriate.

5.7 Ethical & responsible use — Do not generate impersonation, bullying, explicit or offensive content; avoid discriminatory prompts; attribute AI assistance; consider tool limitations; ensure human oversight.

5.8 Appropriate use by teachers - Staff must model the FACTS process when creating or reviewing AI-generated material and should explicitly teach pupils how to apply the framework when AI use is permitted (see Section 7). This approach supports pupils' digital literacy, critical thinking and ethical discernment, and aligns with the school's commitments to truth, fairness and responsible technology use (Section 3b).

All staff must follow the FACTS prompting framework when using AI tools for planning, resource creation, communication or professional tasks. The FACTS framework provides a structured, safe and educationally sound approach to prompting by emphasising clarity, accuracy, contextual awareness and iterative improvement. It supports key policy requirements relating to bias reduction, factual integrity and responsible use of AI outputs (see Sections 5.5 and 3b).

FACTS Framework

- **F – Focus Prompts:** Ensure prompts are clear, concise and purposeful.
- **A – Analyse Outputs:** Check for hallucinations, factual errors and inaccuracies.
- **C – Check for Bias:** Identify any stereotypes, unfair assumptions or discriminatory patterns.
- **T – Tailor Suitability:** Confirm content is appropriate for the context, age group and curriculum.
- **S – Strengthen Prompts:** Refine instructions for improved accuracy and clarity in future iterations.

6. Educating Pupils About AI

Pupils should develop knowledge, skills and discernment to navigate AI safely and responsibly. Education will be embedded across the curriculum and include:

- Safe and responsible creation and use of digital content.
- Benefits, limitations and risks of generative AI, including inaccuracies and bias.
- How information online is organised, ranked and recommended.
- Ethical and responsible use aligned to Christian values of truth, dignity and community.

Pupils will learn to question accuracy, recognise misinformation and bias, compare outputs with trusted sources, and understand that technology has no consciousness or moral judgement.

Safeguarding and online safety education will address harmful or misleading content and reporting routes.

Themes such as truthfulness, wisdom, stewardship and loving our neighbour may be explored through Collective Worship and RE.

The school will engage parents and carers through workshops, guidance and updates explaining benefits, risks and the school's approach.

This curriculum ensures all pupils gain AI understanding, even if the school restricts direct pupil use (see Section 7).

7. Use of AI by Pupils

Controlled Educational Use: Older pupils may use AI in supervised learning (research, drafting support, creative prompts) with clear boundaries, teacher oversight, and prohibition in assessments or independent tasks requiring authentic work. Pupils must reference tool name and date when used as a source.

Pupils permitted to use AI will receive explicit instruction in applying the FACTS framework to ensure that any engagement with AI is safe, ethical and purposeful. Teaching pupils to *Focus prompts, Analyse outputs, Check for bias, Tailor suitability and Strengthen prompts* provides a structured approach that supports responsible digital behaviour and academic integrity. Embedding FACTS within supervised AI aligns with whole-school careers policy expectations by strengthening key career nutrients—including professional rigour, organised thinking, creative and entrepreneurial problem-solving, service-oriented awareness, responsible influence, research-driven curiosity and adaptive responsiveness—thereby ensuring that responsible AI use contributes directly to pupils' broader career development and readiness for future pathways.

8. Formal Assessments

AI must not be used by pupils in any assessment requiring independent work (internal, school-based or external). The school will follow the latest guidance from examination bodies (e.g., JCQ) regarding authenticity, malpractice prevention and reporting.

Teachers will provide clear guidance on permitted support, design tasks that discourage inappropriate AI use, and report suspected malpractice. Indicators may include sudden changes in style, unusually polished responses or typical AI errors.

To protect fairness and equity, AI must not advantage any pupil during assessment; reasonable adjustments remain human-led and aligned with SEND policy.

9. Staff Training

The school will provide ongoing CPD so staff can use AI safely, ethically and effectively. Training will enable staff to understand benefits/risks; apply professional judgement; distinguish open vs. closed tools; anonymise data; identify bias and misinformation; and attribute AI assistance.

Core programme components include: foundations of AI in education; safeguarding with AI; data protection and DPIAs; bias, misinformation and fairness; ethical and responsible use; and practical workload-reducing pedagogy.

Training will be delivered through INSET, staff meetings and CPD cycles, refreshed at least annually or when significant changes arise. The Headteacher/AI Lead ensures access; the DPO leads GDPR content; the DSL leads safeguarding content. Records of attendance will be kept. Practice will be updated in light of emerging best practice and technology changes.

10. Referral to our Child Protection and Safeguarding Policy

AI-related risks fall under safeguarding. Any concerning AI use or exposure to harmful content must be reported immediately to the DSL and handled under the school's Child Protection and Safeguarding Policy and KCSIE duties. Risks include grooming, harassment, extortion, exposure to harmful or explicit content, manipulative prompts and bullying/impersonation. The DSL assesses concerns, records incidents, makes referrals where needed, and identifies emerging risk patterns; online harms are managed via the Online Safety Policy and safeguarding framework. All staff must remain vigilant, ensure pupils cannot access harmful tools, review AI-generated materials before use, and report concerns immediately.

11. Breach of this Policy

11.1 By staff — Examples: using unapproved tools or entering personal data into unauthorised tools; generating impersonating, explicit or discriminatory content; relying on AI without fact-checking. Breaches are addressed under the Staff Code of Conduct; action may be taken whether conduct occurs in or out of hours, on personal or school devices, on-site or off-site. Staff must cooperate with investigations, including providing access to the application and relevant credentials. Any suspected breach must be reported to the Headteacher immediately. If personal/sensitive data is entered into an unauthorised tool, it will be treated as a data breach and managed under the Data Protection Policy.

11.2 By governors — Breaches are handled under the governing board's Code of Conduct and local procedures. Minimum expectations include using only approved tools, not entering identifiable data into open systems, attributing/fact-checking outputs, and cooperating with investigations.

11.3 By pupils — Responses follow the Behaviour Policy and, where relevant, the Safeguarding Policy. Submitting AI-generated work as one's own is malpractice. Pupils must not impersonate, bully or generate explicit content using AI.

12. Monitoring and Transparency

This is a live policy. It will be updated when technology, risks, law or guidance change, and formally reviewed at least annually with the governing board. Leadership (Headteacher/Al Lead) monitors implementation; the DPO and DSL provide compliance and safeguarding insights. The school will evaluate impact via staff and pupil feedback, QA of resources, outcomes, incident reports and bias monitoring. We will communicate openly with staff, parents/carers, governors and pupils about AI use. Schools may require staff to sign an AI Use Agreement confirming understanding of risks and responsible use. Training, guidance and policy will be updated proactively as new risks and tools emerge, and learning from incidents and reviews will inform revisions.

13. Links with Other Policies

This AI Policy should be read alongside: Data Protection Policy; Child Protection and Safeguarding Policy; Online Safety Policy; ICT Acceptable Use Policy; Behaviour Policy; Assessment and Exams Policies; Equality Policy; Marking and Feedback Policy; Homework Policy; and any other relevant local policies (e.g., Remote Learning, Cybersecurity, Curriculum, SEND).

Appendix 1: Approved Uses of AI (Categories-Based Template)

Below are examples of approved uses of AI by staff. The school will establish and maintain a formal list of approved AI tools; however, while this list is still being developed—given the rapidly evolving nature of AI—**no personal information or data may be entered into any AI tool under any circumstances.**

Category 1 — Planning & Curriculum Support: draft lesson ideas, adapt materials, provide alternative explanations, summarise content. Conditions: check accuracy/bias; staff remain responsible for quality.

Category 2 — Administrative & Workload-Reduction: draft communications, summarise documents, generate templates. Conditions: no confidential data in open tools; review before sending.

Category 3 — Accessibility & Inclusion: simplified/translated texts, visual supports, alternative formats. Conditions: ensure age-appropriateness and verify accuracy.

Category 4 — Creative (Visual/Audio/Text): images/illustrations, layouts, non-sensitive audio prompts. Conditions: avoid identifiable individuals; ensure appropriateness; use misleading images only for explicit teaching about AI.

Category 5 — Professional Reflection ('Critical Friend'): feedback on clarity/tone/structure, reframing for specific audiences. Conditions: staff retain ownership and accountability; use secure tools for sensitive drafts.

Category 6 — Research & Information (Staff Only): background information, strategy lists, summaries (respecting copyright). Conditions: critically evaluate reliability; verify using trusted sources.

Category 7 — AI-Assisted Resource Creation: draft worksheets, questions, explanations, visual layouts. Conditions: thorough review for accuracy, fairness and suitability; align with curriculum and safeguarding.

Prohibited unless explicitly approved: tools analysing/storing personal data; real-time scraping without filters; deepfakes/impersonations/synthetic voices; explicit/violent content generators; behavioural prediction/profiling; AI that simulates spiritual or pastoral input.

School-level completion table (to be filled locally):

Alignment with DfE Guidance

This policy aligns explicitly with Department for Education (DfE) guidance, including the policy paper 'Generative Artificial Intelligence (AI) in Education' (updated 12 August 2025), which emphasises safe, effective and risk-based use of AI. The following principles have been incorporated to strengthen alignment:

- AI should support teacher workload reduction and enhance teaching quality.
- All AI use must be carefully assessed for risks and benefits in context.
- Pupil-facing AI must be used with great care, ensuring supervision, safeguarding, data protection compliance and age-appropriateness.
- Staff must remain vigilant for inaccurate, biased or harmful AI outputs and review AI-generated materials before use.
- Expectations around academic integrity and responsible use must be clearly communicated to pupils, staff and parents.
- Staff training will incorporate DfE's national materials, including the Safe and Effective Use of AI in Education online modules.
- Only AI tools meeting DfE expectations for safety testing, transparency and reliable performance will be approved for use.

Bibliography

Department for Education. (2025). *Generative artificial intelligence (AI) in education*. UK Government.

UK Parliament. (2018). *Data Protection Act 2018*. UK Government.

Information Commissioner's Office. (n.d.). *Guide to the UK General Data Protection Regulation (UK GDPR)*.

Department for Education. (2025). *Keeping Children Safe in Education*. UK Government.

Equality Act. (2010). *Equality Act 2010*. UK Government.