



Artificial Intelligence Policy

Mission Statement

‘To educate young people to meet the challenges of life courageously, to use their talents to the full and to live the values of Christ’s Gospel’

Artificial Intelligence (AI) is already deeply integrated into commercial and everyday life, and its impact is expected to grow rapidly across nearly all industries, including education. One significant development is **Generative AI** – a type of technology that creates new content by learning from vast amounts of data drawn from various sources. This fast-evolving and increasingly accessible technology can generate text, audio, code, images, and video simulations. While it presents exciting opportunities for schools and students, it also introduces new risks that must be carefully managed.

Artificial Intelligence (AI) plays a vital role in today’s world and presents a wide range of opportunities to enrich teaching, learning, and school operations. This policy outlines Thornton College’s commitment to the responsible and effective use of AI. Through the thoughtful integration of AI technologies, we aim to:

- Improve educational outcomes and enrich learning experiences for students
- Assist teachers in managing their workload more efficiently and effectively
- Promote safe, ethical, and informed use of AI among staff and students
- Use AI as a tool to build digital literacy and future-ready skills
- Equip staff and students for a future where AI is embedded in everyday life
- Foster educational equity by addressing learning gaps and offering personalised support
- Optimise school operations to reduce costs and enhance efficiency

All users of AI within Thornton College must adhere to relevant laws, regulations, and policies, including those related to *Keeping Children Safe in Education*, data protection (such as the UK GDPR), intellectual property, and copyright. The unauthorised use of copyrighted materials or the creation of content that infringes on others’ intellectual property rights is strictly prohibited.

The safety and privacy of our students remain a top priority. We will not knowingly use any AI tools that compromise student safeguarding or online safety. Staff must ensure that no personal data or student work is used to train generative AI models unless appropriate consent has been obtained or a valid copyright exemption applies.

This approach reflects current guidance from the Department for Education and the Information Commissioner’s Office, which emphasise transparency, fairness, and accountability in the use of AI in schools.

We acknowledge that AI technology is evolving rapidly and are committed to staying informed and responsive to these developments, adapting our practices as needed. We value the leadership provided by the Department for Education and have drawn on their *Statement on Generative Artificial Intelligence in Education* to inform this policy. As both the technology and official guidance continue to develop, this policy will be subject to regular review to ensure it remains current and effective. Accordingly, it will be formally reviewed on an annual basis.

We are committed to transparency and accountability in our use of AI technologies. All stakeholders – including staff, students, parents, and partners – will be informed about where and how AI is used, as well as who is responsible for its implementation, for example through email or at information evenings. Feedback and questions from stakeholders will be welcomed and addressed in a timely and appropriate manner.

By following this policy, we aim to create a responsible, inclusive environment for the use of AI in education; one that upholds the principles of privacy, fairness, and transparency for the benefit of all members of Thornton College community.

Scope

This policy applies to all individuals working within or on behalf of Thornton College, including permanent and temporary staff, consultants, governors, volunteers, and contractors. It also extends to students, who will require appropriate support and guidance from staff as part of their learning journey.

All staff are expected to read and understand this policy before engaging with any AI technologies.

School leaders are responsible for ensuring that their teams are familiar with this policy, comply with its requirements, and report any suspected breaches.

Several key staff members contribute to the development and oversight of AI use within the School:

- **Assistant Head – Director of Studies:** Leads the School's approach to AI, monitors compliance, promotes responsible use, and coordinates training as needed.
- **IT Manager:** Provides technical support and guidance on AI systems and tools.
- **Governing Body:** Oversees AI use from a governance perspective, ensuring alignment with safeguarding and online safety standards.

Training will focus on how AI can enhance staff roles by freeing up time and resources for personalised teaching, student engagement, and the development of critical thinking skills.

By integrating AI technologies with professional expertise and judgment, we aim to foster a collaborative and effective educational environment that leverages the strengths of both human and artificial intelligence.

This policy should be read in conjunction with other relevant school policies, including:

- Child Protection and Safeguarding
- GDPR
- IT Acceptable Use & Online E-Safety
- IT Disaster Recovery Plan
- Curriculum Policy (Whole School and EYFS)

Staff use of AI

Staff are encouraged to explore and use AI-powered tools to support their professional responsibilities. These tools may assist with tasks such as marking and feedback, report writing, lesson planning, professional development, and facilities management. AI can enhance efficiency and effectiveness while still relying on staff's professional judgment and expertise.

AI tools must be used responsibly and ethically, serving as a complement – not a replacement – for professional decision-making. Staff remain fully accountable for the quality, accuracy, and appropriateness of any content generated or supported by AI, regardless of the tool used.

Staff will be provided with appropriate training and support to integrate AI effectively into their roles. This includes professional development opportunities focused on the practical use of AI in both administrative and teaching contexts. Training needs will be identified through personal development reviews, appraisals, or as they arise. Staff are also expected to proactively identify any gaps in their knowledge and discuss these with their line manager to ensure compliance with this policy.

AI tools can support staff in developing high-quality educational resources by assisting with the creation of whole-class or personalised lesson plans, extension activities, scaffolded tasks, and the identification of potential knowledge gaps. For example, AI platforms may suggest relevant topics or learning activities. Teaching staff are encouraged to use these suggestions as a foundation, applying their professional expertise to tailor content and ensure alignment with student learning objectives.

AI may also be used to automate certain aspects of assessment, such as marking multiple-choice or fill-in-the-blank questions. These tools can help streamline the grading of objective responses, allowing teachers to dedicate more time to individual student support and feedback.

For more subjective assessments, such as written responses, AI can assist in identifying areas for improvement. However, all AI-generated marks or feedback must be reviewed and verified by teaching staff. Educators are expected to apply their professional judgment, particularly when evaluating open-ended or analytical responses that require deeper interpretation.

Teaching staff may guide students in using AI tools to receive feedback on their own work, mirroring peer assessment practices. This approach enables students to gain immediate, personalised feedback and improvement strategies, helping them identify misconceptions, close knowledge gaps, and enhance their writing—whether structured or creative. As with traditional peer assessment, staff must remain actively involved in this process, monitoring the quality and appropriateness of AI-generated feedback.

AI tools can support staff in drafting student reports by improving efficiency and accuracy. However, any AI-generated content must be carefully reviewed and edited by the teacher to ensure it reflects their professional observations, assessments, and personalised feedback.

Staff may use AI to gather insights and identify patterns in student performance data. While AI can streamline analysis and promote consistency, it must be used as a support tool. Final evaluations and feedback must be based on the teacher's professional expertise, ensuring a well-rounded and contextual understanding of each student's progress.

When AI is used in any aspect of staff work, its use must be transparent. Staff should clearly indicate where AI has been applied and describe any professional review or modifications made. AI tools and school data must never be used for personal gain or in violation of any applicable laws or school policies.

Student use of AI

As part of our safeguarding and child protection responsibilities, Thornton College will ensure that students are protected from harmful online content, including material generated by AI technologies. All AI tools used will be assessed for age-appropriateness and educational suitability. Staff will be made aware of the risks associated with AI-generated content, including deepfakes and impersonation technologies.

Students will be encouraged to explore and engage with age-appropriate AI projects, enabling them to use AI for knowledge building, problem-solving, data analysis, and creative expression in a safe and structured environment.

A culture of responsible AI use will be promoted by involving students in discussions around data privacy, algorithmic bias, safeguarding, and the broader social implications of AI technologies.

Students will be explicitly taught not to input personal, sensitive, or confidential information into generative AI tools. This includes any data that could be used to identify themselves or others.

AI education will be embedded into the curriculum to help students understand the capabilities, limitations, and ethical considerations of AI. They will be guided on how to identify trustworthy AI sources and critically evaluate the credibility and accuracy of AI-generated content. Students will be encouraged to use AI as a 'thought partner' and not as a substitute for thinking.

AI tools and technologies may be integrated across subjects and year groups, offering students hands-on experience and opportunities to develop essential AI literacy and digital skills.

Potential Misuse of AI

Students will be educated on the responsible and ethical use of AI, including the risks and consequences of over-reliance on AI tools for completing assignments, coursework, or homework. Staff will encourage students to be transparent about any use of AI in their work, clearly indicating where it has supported their learning or output.

Teaching staff will reinforce the importance of critical thinking, creativity, and originality in student work. The misuse of AI for plagiarism or academic dishonesty will be actively discouraged. Clear guidelines will be communicated regarding the appropriate use of AI during assessments, ensuring that submitted work reflects each student's own understanding and effort.

These key messages will be embedded within the Computer Science Curriculum and consistently reinforced across all subjects, particularly where students are producing work for external assessment or grading.

Thornton College will adhere to the rules and guidance on the use of AI in assessments given by the Joint Council for Qualifications or individual Awarding Organisation requirements

<https://www.jcq.org.uk/examsoffice/malpractice/artificial-intelligence/> and

<https://www.jcq.org.uk/examshttps://www.jcq.org.uk/examsoffice/blogs/updating-the-jcq-guidance-on-ai-use-in-assessments/office/blogs/updating-the-jcq-guidance-on-ai-use-inassessments/>

Teaching staff will use a variety of assessment methods to evaluate student understanding and ensure authentic learning, including checking for drafts, comparison with previous work, and use of AI checker tools as appropriate. Teachers will also make use of flipped strategies where appropriate, for example where class time is optimised for tasks such as timed assessments.

By employing diverse assessment strategies, staff can assess comprehension in ways that go beyond what AI tools can measure, promoting deeper learning and genuine student engagement.

Students will also be educated on the potential misuse of AI by individuals seeking to deceive or manipulate them. This includes awareness of AI-generated impersonation, such as deepfakes or synthetic voices, which may be used to trick students into unsafe or inappropriate actions. Teaching staff will help students recognise these risks and respond safely and responsibly.

Ethical Use of AI

The use of AI systems—particularly Generative AI—will be approached with caution and a clear understanding of their limitations. Whether used for teaching, administrative tasks, or student learning, staff must remain mindful of the following key considerations and ensure students are also made aware:

- **Bias:** AI-generated content may reflect biases present in the data on which the model was trained. This could result in outputs that are unintentionally discriminatory or unbalanced, particularly in relation to race, gender, or socioeconomic background.
- **Accuracy:** AI-generated information is not guaranteed to be correct. All content should be critically evaluated and fact-checked before being used or shared.
- **Currency:** Some AI models are trained on data up to a specific point in time and may not include the most recent developments or information. Users should verify that the content is up to date and relevant.

Data Protection implications of using AI

Staff and students must understand that any information entered into a Generative AI model may no longer be private or secure. Under no circumstances should personal data, intellectual property, or confidential information – including commercially sensitive material such as contracts – be input into Generative AI tools. Staff are expected to familiarise themselves with, and educate students about, the data collection, storage, and usage practices associated with AI technologies.

Staff intending to use AI tools must assess whether a **Data Protection Impact Assessment (DPIA)** is required, in line with the School's **Data Protection Policy**.

When registering for Generative AI services that require personal information (e.g. names or email addresses), staff must consider whether this constitutes data sharing and whether a DPIA is necessary.

Any DPIA or data protection assessment related to AI use will include the following considerations:

- The **nature, scope, context, and purpose** of personal data processing, and whether individuals would reasonably expect such processing.
- Evaluation of **alternative methods** (AI and non-AI), with justification for the chosen approach and its fairness.
- Identification of any **automated decision-making** and its potential impact on individuals.
- Assessment of **individual, allocative, and representational harms**, such as biased decisions affecting subject choices or intervention eligibility.
- A review of whether the AI use is **proportionate and fair**, balancing benefits against risks to individuals' rights and freedoms, and identifying possible safeguards.
- Analysis of **algorithmic bias or inaccuracies** that could negatively affect individuals.
- Comparison of **human vs. AI accuracy** where AI replaces human judgment, to justify its use.
- Explanation of how individuals will be **informed of automated decisions** and how they can **challenge** them.
- Consideration of **margins of error** and the role of human oversight in decision-making.
- Evaluation of **security risks** associated with AI use.
- A summary of **stakeholder consultations**, including with individuals whose data may be processed, unless there is a valid reason not to consult.
- Identification of whether **special category data** is being processed—either directly or by inference (e.g. using postcodes to infer race).

- Consideration of broader **rights and freedoms**, including those protected under the **Equality Act 2010**, beyond data protection alone.

Cyber security

Thornton College is committed to ensuring the secure and reliable use of AI technologies by implementing appropriate technical and procedural safeguards, as guided by the National Cyber Security Centre. These measures include:

- **Cybersecurity Protocols:** Enforcing strong cybersecurity practices such as encryption, regular security patches and updates, secure data storage, and strict access controls to protect systems and data.
- **Oversight and Governance:** Establishing clear oversight procedures for data handling, system modifications, and incident response to maintain the integrity and reliability of AI systems.
- **Incident Reporting:** Ensuring that any suspected or confirmed security incidents are promptly reported to the IT Manager for investigation and resolution.
- **Security Evaluation of AI Tools:** Conducting thorough evaluations of AI tools prior to use, including reviewing their security features, terms of service, and data protection policies. This evaluation will form part of the Data Protection Impact Assessment (DPIA) process.
- **Deepfake Awareness:** Maintaining vigilance against synthetic media (deepfakes) that may be used to spread misinformation or impersonate individuals for malicious purposes, including cyber fraud.
- **Cybersecurity Education:** Providing training for staff and students to raise awareness of cybersecurity risks, including the potential misuse of AI in cybercrime, and promoting safe digital practices.