



Things done well make the best memories

SIR NORTON KNATCHBULL – 1637

Use of AI Policy

Policy Owner	Headteacher
Reviewed by	Tom Sparrow, AHT Matt Gowen, Head of Computer Science
Delegated Authority	Reserved for the FGB
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Equality Impact Assessment	Tom Sparrow 30 th November 2023
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Introduction

This policy refers to employees and governors of the Norton Knatchbull School (and students/pupils of the Norton Knatchbull School (referred to as “pupils” in the policy). The terms “AI” and “Artificial Intelligence” refers to the commercial/marketing term used to describe “machine learning” tools such as generative large language models (LLMs). Examples of these are included in the appendix to this policy but the policy applies to all tools which use large data sets and models created by training data models and generate predictive results from these data, whether the output is numerical, image based, video etc. This is distinct from the scientific definition of Artificial Intelligence as Generalised AI models which are not yet routinely available.

We reserve the right to amend this policy from time to time to ensure that its operational needs are met.

1. Aims and scope

The Norton Knatchbull School understands the valuable potential that generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations such as environmental concerns.

Therefore, the aim of this policy is to establish general guidelines for the ethical, secure and responsible use of AI technologies across our whole school community.

This policy covers the use of AI tools by school staff, governors and pupils.

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, governors and pupils for a future in which AI technology will be an integral part
- Promote equity in education by using AI to address learning gaps and provide personalised support
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK Data Protection Act (GDPR) 2018 and subsequent amendments.

1.1 Definitions

This policy refers to both ‘open’ and ‘closed’ generative AI tools. These are defined as follows:

- **Open generative AI** tools are accessible and modifiable by anyone. They may store, share or learn from the information entered, including personal or sensitive information
- **Closed generative AI** tools are generally more secure, as external parties cannot access the data you input

2. Legislation

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

- [AI regulation white paper](#), published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence, and its later-published [UK Science and Technology Framework](#).

- [Generative artificial intelligence \(AI\) and data protection in schools](#), published by the Department for Education (DfE)
- [Standards & Testing Agency](#)/Joint Council for Qualifications regulations for Examinations and Non-examined assessments [current requirements](#)
- [UCAS terms](#)/advice for University Applications

This policy also meets the requirements of the:

- [UK General Data Protection Regulation \(UK GDPR\)](#) – the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020
- [Data Protection Act 2018 \(DPA 2018\)](#)

3. Regulatory principles

We follow the 5 principles set out in section 3.2.3 of the [AI regulation white paper](#), or the subsequent law once passed.

4. Roles and responsibilities

4.1 Pupils

We recognise that AI has many uses to help pupils learn. Pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas;
 - o If a pupil is unsure what they can or cannot use AI tools to generate for a particular task, the pupil must verify this with their teacher
- When specifically studying and discussing AI in schoolwork, set by a teacher

AI may also lend itself to cheating and plagiarism. To mitigate this, pupils must not use AI tools:

- during assessments, including internal and external assessments
- to write coursework, homework or in-class assignments, where AI-generated text is presented as their own work
- to complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations)
- include any content from AI that they have not read and checked

This list of AI misuse is not exhaustive. Misuse of AI in exam assessments is considered malpractice by all Examination Boards.

Where AI tools have been used as a source of information, pupils must reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

We consider any unattributed use of AI-generated text or imagery to be misuse and will follow our Teaching/Learning and Behaviour policies if students are found to be plagiarising work. In the context of exam coursework, the Exam Board will be informed.

Pupils must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully or harass another person

- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy. **4.2 All staff**

Staff must:

- Check against and use only approved AI tools (see section 5)
- Seek advice from the data protection officer / IT team / Head of Computer Science, as appropriate
- Ensure there is no identifiable personal data included in what they put into Open generative AI tools
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

4.3 Governors

The governing board will:

- Take overall responsibility for monitoring this policy and holding the headteacher to account for its implementation in line with this policy
- Ensure the headteacher is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school
- Adhere to the guidelines below to protect data when using generative AI tools:
 - Use only approved AI tools (see section 5)
 - Seek advice from the Data Protection / IT Team / Head of Computer Science, as appropriate
 - Check whether they are using an open or closed generative AI tool
 - Ensure there is no identifiable information included in what they put into open generative AI tools
 - Acknowledge or reference the use of generative AI in their work
 - Fact-check results to make sure the information is accurate

4.4 Headteacher

The headteacher will:

- Take responsibility for the day-to-day leadership and management of AI use in the school, delegated to the Senior Leadership Team and Middle Leaders including the Head of Computer Science / E-Learning where required
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Ensure that the guidance set out in this policy is followed by all staff
- Ensure this policy is reviewed and updated as appropriate
- Ensure staff are appropriately trained in the effective use and potential risks of AI

- Make sure pupils are taught about the effective use and potential risks of AI
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, IT Team, and data protection impact assessments

4.5 Data protection officer (DPO)

- The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.
- Our DPO is Judicium Education available on 0345 548 7000 or dataservices@judicium.com
- Our internal data lead is Mrs L Seed and is contactable via lseed@nks.kent.sch.uk.

4.6 Safeguarding lead

- The safeguarding lead is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, being aware of new and emerging safeguarding threats posed by AI
- Updating and delivering staff training on AI safeguarding threats
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE)

4.6 Parents

- Parents/guardians will be kept informed of AI tools via regular communication, and asked to support the school by
 - reinforcing the basic principles of suitable use of IT and AI when pupils are completing schoolwork at home
 - let the school know if they have concerns or new information about tools that the school is not aware of
 - consider advice provided to the school in terms of parental controls available through broadband and mobile networks to exclude certain inappropriate tools or content

Procedures for use of AI Tools

5.1 Approved use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete but cannot replace the judgement and knowledge of a human expert.

Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it.

5.2 Process for approval

A live-list of approved AI tools is available in the Staff Sharepoint, linked in Arbor. An example original copy of this list is shown in the appendix at the end of this policy.

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. In the same way as seeking approval for use of IT tools for use with students, Staff should contact IT team / Head of Computer Science who can review the details and identify whether a formal approval via the Data Protection Officer needs to be made via Judicium through its Data Protection Impact Assessment process, as is already the case for web-services that may process student/staff data.

5.3 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, The Norton Knatchbull School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy.

5.4 Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Staff must be careful not to upload copyright material to AI models. Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race and disability. This means that critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output before relying on it.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our complaints procedure.

5.6 Raising concerns

We encourage staff and governors to speak to the headteacher in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

6. Educating pupils about AI

The Norton Knatchbull School acknowledges that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI.

In Computer Science lessons, reinforced by teaching by all subject teachers across the curriculum, students are taught how to:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

All students in their KS3 Computer Science lessons will be informed of the policy and actions they should take to make appropriate use of these tools as they evolve. Beyond KS4, use of core Personal Development lessons will be used to ensure all students receive the latest advice and guidance.

7. Use in Formal assessments

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

Staff should

- Ensure pupils are formally warned with regards to the use of AI in the taught elements of all assessments at all levels
- Ensure staff-access to formal coursework, for example holding the live copy of coursework on Sharepoint so that the version history can attribute time, size and content of all changes to files
- Use any AI identification tools that the school has licensed use of.
- If a pupil is suspected of malpractice with AI (as with any suspected plagiarism) then staff should interview the pupil to verify their knowledge of the content. Students who have used AI to generate work that is not their own work will have limited detailed awareness of the content and this can be judged by subject-teachers.
- Aim to reflect the possible use of AI in assessments and examine ways to change assessment to avoid risk of AI mis-use. For example, KS3 Computer Science “coding project” assessments which depended on a *final product* being assessed have been gradually replaced with guided-projects with end-of-project “assessment of understanding”. This means that whether students use AI well to help understand the concepts or use other techniques, the assessment is testing their understanding and skill.

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

8. Staff training

Staff will be familiarised with current good practice with regards to AI through amendments to this policy, in person training, updates through school communication media and training specific to their area of work.

9. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy will be kept updated by the Head of Computer Science / E-Learning in liaison with the Senior Leadership Team and the Governors whenever there is a significant change to either AI use by the school or the associated risks of AI usage.

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

The policy will be shared with the full governing board when changes are required.

All teaching staff are expected to read and follow this policy.

We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

10. Links with other policies

This AI policy is linked to the following [existing policies](#):

- Data protection policy
- Information Security Policy
- Data Breach policy
- Teaching, Learning and Assessment policy
- Child Protection and Safeguarding Policy
- Behaviour policy
- Acceptable use and E-Safety policy
- Equal Opportunities and Diversity policy

Appendix – example of AI approved tools list

Tools marked in green have been data-protection checked and can be used with personal data such as student names without further Data Protection risk assessments being made. Other tools are only appropriate for resource-generation tasks with the usual professional judgement for appropriate material for the age of students.

AI TOOL	APPROVED USES
Microsoft CoPilot (within school MS365 sign-in)	• Creative use / creation of lesson content • School data analysis • Generation of content for sharing with parents, including confidential data about their child (subject to meeting data protection requirements) • Drafting of documents • Drafting of communications
Satchel One AI	• Creation of homework tasks / materials
Arbor AI	• Summarisation of internal data • Creation of draft content for sharing with parents (subject to Data protection requirements)
Microsoft CoPilot (personal accounts)	• Generation of lesson content only • Cannot be used with materials which identify students, parents or staff.
Google Gemini Samsung AI Apple Intelligence + other AI tools on personal devices	• Generation of lesson content only • Cannot be used with materials which identify students, parents or staff.
Chat GPT / Canva AI / Adobe / Teachmate AI / + other creative AI tools	• Generation of content only • If tools are used, for example, to generate data for feedback, reporting, student names must be anonymised to meet data protection requirements.

NKS Equality Impact Assessment

The purpose of an Equality Impact Assessment (EIA)

To ensure that policies, functions, plans or decisions do not create unnecessary barriers for people protected under the Equality Act 2010. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised.

POLICY STATUS Annual review

Person(s) reviewing Matt Gowen, Head of Computer Science

Date completed: June 2026

1. Aim of the policy or practice

To provide a clear, comprehensive and ethical framework for the responsible use of artificial intelligence (AI) tools by staff, governors and pupils. The policy aims to promote safe, inclusive and beneficial use of AI technologies while mitigating associated risks and ensuring compliance with relevant legislation.

2. Who will benefit from this policy or practice?

- **Pupils** – through supported, equitable access to AI-enhanced learning, and protection from misuse
- **Staff** – through workload support, professional development, and guidance on safe, ethical use
- **Governors** – through informed decision-making and oversight of AI usage and risks
- **Parents/Carers** – through transparency, safeguarding, and involvement in guiding appropriate use at home

3. Evidence considered

- UK GDPR and Data Protection Act 2018
- DfE and DSIT guidance on AI and data protection in schools
- Joint Council for Qualifications (JCQ) AI assessment regulations
- NKS policies: Behaviour, Data Protection, Teaching & Learning, Safeguarding
- NKS pupil and parent feedback mechanisms
- Known bias risks within AI models, especially concerning protected characteristics

4. What is the possible impact of this policy on any of the following groups?

Protected Characteristics	Impact	Details (if applicable)
Age	Possibly negative	There is a recognised potential for embedded algorithmic bias within AI platforms. Such bias could impact all protected characteristics, depending on the specific AI platform and its training data. Staff and governors are advised to critically evaluate and fact-check outputs from AI tools consistently
Disability		
Gender reassignment		
Marriage and civil partnership		
Pregnancy and maternity		

Race		across all protected characteristics to mitigate this risk."
Religion or belief		
Sex		
Sexual orientation		

5. Could any group be excluded or experience disadvantage?

There is a potential digital divide where pupils with limited access to technology at home may be disadvantaged in independently exploring AI tools. The policy encourages equitable access through supervised school use, curriculum integration, and safeguarding.

Safeguards are in place to prevent discriminatory use of AI, including robust guidance for staff and governors on fact-checking and misuse, and clear consequences for pupil misuse. Ongoing training and updates will mitigate this risk.

6. . Actions to mitigate risks identified

- Curriculum delivery (KS3–KS5) to ensure digital literacy and ethical awareness across all pupil groups
- Adjustment of assessment methods to avoid risk of AI-misuse
- Staff training includes awareness of bias and safeguarding in AI
- Data Protection Officer and DSL oversight to monitor compliance and emerging risks
- Engagement with parents and carers to support responsible use outside school
- Approval pathway for new tools ensures equitable access and risk checks before implementation

7. Conclusion

This policy has been designed to ensure the ethical and inclusive use of AI across the school. Potential impacts related to bias or access are addressed through layered safeguards, staff oversight, and regular monitoring. No group is unjustifiably disadvantaged by this policy when implemented as intended.

The policy promotes digital inclusion, responsible innovation, and protection from harm, aligning with our commitment to equality and fairness across the school community.