

Generative AI Use Policy

Action	Policy to be reviewed annually		
	Owner	Date	Completed
Review	Director of Innovation	November 2025	✓
Approve	High Mistress	January 2026	✓
Next Review		Autumn 2027	

To be published on the following:	
Website	✓
Staff Portal	✓
Student Portal	✓

Online Safety Policy

To whom this policy applies

This policy applies to all staff and students and outlines the safe, effective, and responsible use of Generative Artificial Intelligence (AI) in our school context.

What this policy is for

This policy promotes a set of shared principles, and clear red lines, which underpin the responsible use of AI in teaching, learning, operations, and administration.

Relevant Statutory and School Policies

National Guidance and Statutory Frameworks

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- Generative Artificial Intelligence (AI) in Education – DfE guidance
- JCQ Guidance on AI Use in Assessments

Relevant school policies

- Safeguarding and Child Protection Policy 2025
- Behaviour Policy and Anti-Bullying Policy
- Privacy Notices (Staff and Students)
- Data Breach Policy
- Online Safety Policy
- Mobile Phone Policy
- Acceptable Use Policies (staff and students)
- Plagiarism Policy and Malpractice (Exams) Policy
- Staff Code of Conduct

Appendices

Appendix A: Approved AI Chatbots in School for Staff and Students

Appendix B: Student AI USE Flowchart

Appendix C: General Internal Classwork Suspicions of AI Misuse (to be applied in cases not involving coursework)

Appendix D: Process to be Followed in Cases of Suspected Misuse of AI (JCQ coursework)

Appendix E: Sustainability

Appendix F: SPGS AI Documentation & Critical Reflection Sheet

Content of policy

1. Aims & Objectives
2. Guiding Principles for Responsible AI Usage in school
3. No use of AI for decision making
4. Student Usage
5. Staff Usage
6. Age Appropriateness, Approval and Consent
7. Data Protection and Privacy
8. Intellectual Property
9. Academic Integrity
10. Use of AI in Public Examinations
11. Consequences of AI Misuse
12. Incident Reporting
13. Training and Education
14. Policy Review

1. Aims and objectives

1.1 AI has become widespread since the launch of ChatGPT at the end of 2022. It is transforming the world of work and reshaping the environment in which our students live and learn.

1.2 At St Paul's Girls' School, we recognise that at the organisational level, pedagogically, and with a view to careers we must respond to these changes in a responsible way.

1.3 Our approach is not to embrace AI uncritically but instead to commit to engaging with it thoughtfully and with a strong emphasis on ethical and intellectual responsibility. Our goal is to equip our community to navigate AI in a way that reflects our values.

1.4 We believe that our teaching staff, with their particular disciplinary insights and pedagogical expertise, are best placed to judge how and when it is appropriate to use AI to support teaching and learning.

1.5 We are mindful of the economic transformation underway and also want to prepare our students for the realities of the future workplace where AI skills will be important.

1.6 We additionally recognise the potential of AI to support the efficiency and effectiveness of school operations and administration. When used with appropriate safeguards and human evaluation, AI can help reduce workload, improve processes, and support innovation.

1.7 Therefore, we aim to:

- Equip staff and students with the knowledge and tools to use AI responsibly and effectively
- Encourage critical, creative, and innovative use of AI in learning and teaching
- Support interdisciplinary dialogue and leadership around AI, grounded in subject-specific expertise
- Promote ethical and transparent use of AI across the school community
- Safeguard academic integrity and support student wellbeing in an evolving digital landscape
- Educate and empower the school staff and students on legal, safe, age-appropriate AI use to protect students' pastoral, emotional and social wellbeing.
- Ensure AI use aligns with data protection, intellectual property rights, and safeguarding expectations
- Explore and implement responsible, efficiency-enhancing uses of AI in school operations and administration.

2. Guiding Principles for Responsible AI Usage in school

2.1 AI tools used in school must be pre-approved and age-appropriate

Digital applications that are primarily driven by AI (for example, chatbots) may only be used by staff and students if they have been assessed and formally approved by the Digital Strategy Group. Approved tools are listed in Appendix A, where specific conditions for use are also outlined.

Where AI is a secondary feature embedded within an existing digital application (for example, an AI summary function within Britannica), the resource must go through the school's standard Online Resource Approval process. Such tools must not be recommended to students unless they have been approved through this process. The request form and list of approved online resources, including those with AI-enabled features, are available on the staff portal.

2.2 All AI use must be critically engaged with and pedagogically structured

AI-generated outputs must always be critically assessed by the user, with attention to accuracy, bias, reliability, and limitations. Staff directing students to use AI must model critical thinking and help structure activities to support meaningful learning and reflection.

2.3 Individuals remain responsible for their work and AI must never substitute for authenticity

Staff and students are fully accountable for any work they produce, whether or not AI tools have been used. AI should support, not replace, original thinking. All work must reflect the user's own understanding, judgement, professional expertise, and voice. Students may be asked to explain or defend their understanding of work submitted.

2.4 Privacy and data protection must be upheld at all times

As a general rule, no sensitive or personal data should be entered into AI tools. The only exception to this is that staff are permitted to use Microsoft Copilot or Google Gemini, through their school login and the enterprise protections this entails, for processing non-sensitive and personal data (see Appendix A for more detail and definitions).

2.5 AI use must be transparent and clearly acknowledged

Any use of AI must be appropriately declared, for instance with details about what tool was used and how. This ensures academic and professional integrity. The school has an AI Critical Reflection sheet which students can use to declare and reflect on usage (see Appendix F).

2.6 No use of AI for decision making

The school strictly prohibits the use of AI tools to make, draft, or influence administrative or operational decisions. Decisions regarding admissions, recruitment, staff or student disciplinary matters, safeguarding, predicted grades, or any other outcome affecting an individual's status or wellbeing must be derived solely from human judgement. AI is not to be used as a source of advice or evaluation in these contexts.

3. Student Usage

3.1 Students may use AI tools, **only if explicitly permitted by their teacher**, to support their learning. Students are encouraged to speak with their teacher if unsure about expectations for a given task.

3.2 Students should:

- Only use AI tools approved by the school (see Appendix A)
- Register for AI tools using their school email address
- Use AI only for permitted activities (these might include idea generation, research, structuring work, exploring creative solutions)
- Critically evaluate all content generated by AI
- Acknowledge AI use.

3.3 Students must not:

- Use AI tools if under 13
- Use AI tools not approved by the school
- Use AI to bypass learning or as a shortcut
- Present AI-generated work as their own without acknowledgment
- Use AI in formal assessments unless approved (see also Malpractice Policy)
- Use AI to draft or edit any part of a college or university application (e.g. personal statements, Common App essays, or supplementary essays), as these must represent the student's authentic voice and perspective
- Input personal or sensitive information into AI tools
- Create or share misleading, inappropriate, or harmful content.

4. Staff Usage

4.1 Staff may use AI tools to support their professional practice. Practical examples of how staff might use AI include:

- Using Copilot to proofread non-sensitive documents
- Using AI tools to help create work-related materials
- Using AI as an additional resource in a lesson.

4.2 Staff should:

- Only use AI tools approved by the school as detailed in Appendix A
- Ensure AI content does not replace personalised feedback or interaction
- Critically assess AI-generated content before using it
- Ensure materials align with the curriculum, safeguarding, school policies, and house style
- Model creative or innovative uses of AI when it supports subject-specific exploration
- Exemplify ethical, critical, and transparent use of AI
- Ensure that any use of AI to generate content for operational and/or administrative purposes, such as to create template policies, are individually adapted to reflect the school's specific requirements and processes and fully evaluated.

4.3 Staff must not:

- Use AI with students under 13
- Recommend AI tools that have not been approved by the school (in Appendix A)
- Enter personal or sensitive data into AI tools (though see Appendix A for exceptions relating to Copilot, which may be used for non-sensitive and personal data)
- Use student work in AI tools without explicit consent (see Intellectual Property Rights below)
- Use generative AI to assess student work. Judgement of student learning must remain a human responsibility, rooted in the teacher's professional expertise and direct engagement with the student. Using AI to evaluate or grade work undermines the trust and connection that sits at the heart of teaching
- Generate student references (both for UCAS and US universities), wholly or in part, using AI. These must reflect the teacher's personal knowledge and professional judgement. References written with AI support often sound artificial, impersonal, or generic
- Generate generic administrative and operational documents or communications wholly with AI which have not had human input and evaluation
- Use AI to inform or determine administrative or operational outcomes. Staff must not input data into AI tools to generate rankings, screen candidates, predict outcomes, or adjudicate on disciplinary issues. The decision-making process must remain entirely independent of AI tools
- Use AI-powered apps/chatbots to record, transcribe or in any other way process meetings, either online or in person due to data protection and privacy concerns and also high risk of recordings/transcripts being shared to a wider audience than intended. Additionally, and on the same grounds, staff should not allow other participants, e.g. from outside the school, to record meetings in such a way.

5. Age Appropriateness, Approval and Consent

5.1 Only AI tools approved by the school may be used. Details are set out in Appendix A. The School's Digital Strategy Group assesses tools and considers application terms and conditions, age-appropriateness, data protection, cybersecurity, and educational value.

5.2 Should a staff member want to use an AI tool not covered they should contact the Deputy Head, Director of Innovation in the first instance.

5.3 Use of approved tools and parental consent for this is covered in the school's Parent Contract. Parents who do not consent for their children to use specific AI tools approved by the school should contact the Director of Innovation; a list of any students whose parents do not consent for them to use specific AI tools is available to staff on the staff portal.

6. Data Protection and Privacy

6.1 Students must not input any personal or sensitive data into any AI tool under any circumstances.

6.2 Staff also must not process any sensitive data using AI; however non-sensitive and personal data may be processed using Microsoft Copilot; this is the only AI tool approved for such use as outlined in Appendix A.

6.3 Staff and students must use their school email addresses when creating accounts for AI tools.

7. Intellectual Property

7.1 Materials created by students, including essays, homework, lesson plans, teaching resources, and prompt designs, are protected under UK copyright law.

7.2 Students retain the intellectual property rights to their original work.

7.3 Staff must not upload, input, or submit student work to any AI platform or external service without explicit permission from the student (or their parent/legal guardian if the student is under 18).

7.4 The use of AI-generated material in teaching or published work must be critically assessed to avoid unintentional copyright infringement.

8. Academic Integrity

8.1 Students must ensure all work is their own and reflects independent understanding.

8.2 Unauthorised AI use is equivalent to academic dishonesty.

8.3 Staff must clearly communicate expectations regarding AI use.

8.4 If permitted:

- Students must acknowledge AI use
- Be fully transparent and explicitly note the tool used, date, and how it was used.

9. Use of AI in Public Examinations

9.1 AI is **never permitted** in formal examinations and also must not be used in formal non-examined assessments such as coursework, unless in exceptional cases where regulations permit this and explicitly approved in writing by both the Deputy Heads, Director of Studies & Director of Innovation. (See also Appendix and the Malpractice Policy.)

10. Consequences of AI Misuse

10.1 AI misuse may result in:

- Loss of marks
- Grade reductions
- Disqualification from a qualification
- Investigation and disciplinary action.

11. Incident Reporting

11.1 If there is suspicion of a safeguarding concern related to the use of AI, including exposure to harmful, inappropriate, or unsafe content or behaviour, the procedure for reporting concerns is outlined in the Safeguarding (Child Protection) Policy. Staff should not investigate or view material but should pass on to a member of the safeguarding team. A list of key contacts is published in the safeguarding policy.

11.2 For cases of academic use or suspected misuse of AI, staff should follow the relevant procedures:

- Appendix C – for internal classwork, homework, or prep
- Appendix D – for formal coursework or assessments regulated by JCQ.

11.3 For all other matters involving AI, such as inappropriate tool use or ethical concerns, staff and students should contact the Director of Innovation. If in any doubt about the appropriate next steps, the Director of Innovation should also be consulted.

11.4 The Director of IT may be contacted for technical advice.

11.5 The Data Protection Advisor should be contacted for any accidental or unauthorised use of personal data using the Data Breach Report Form.

12. Training and Education

12.1 The school is committed to equipping both staff and students with the knowledge and confidence to navigate AI technologies responsibly.

12.2 Regular staff training is held throughout the year for staff in a variety of settings, including at INSET, induction for new staff, in whole-school workshops, at Heads of departments' meeting (HoDs), and in departmental meetings.

12.3 Students have a comprehensive schedule of AI literacy training and induction as part of the SPGS Digital Futures Programme.

12.4 Subject departments, in conjunction with the Exams Officer, are responsible for ensuring that students are made aware of relevant exam board regulations in relation to academic integrity and the use of AI in assessments.

13. Policy Review

13.1 This policy will be reviewed annually by the Director of Innovation, or earlier if required by changes to guidance or technology.

Appendix A: Approved AI Chatbots in School for Staff and Students

The following AI chatbots have been assessed and approved by the Digital Strategy Group for use at St Paul's Girls' School. They are approved for use:

- **only when logging in with a school email address**
- **and as specified in the table below.**

AI Tool	Students	Staff	Non-sensitive Personal & School Data	Sensitive Personal & School Data
Microsoft Copilot	✓ Ages 13+ (ie LV)	✓	✓ (permitted for staff; <u>NOT</u> permitted for students)	✗
ChatGPT (OpenAI)	✗ Not approved for any students	✓	✗	✗
Google Gemini	✓ Ages 13+ (ie LV)	✓	✓ (permitted for staff; <u>NOT</u> permitted for students)	✗
Google NotebookLM	✓ Ages 13+ (ie LV)	✓	✓ (permitted for staff; <u>NOT</u> permitted for students)	✗
Google Search - AI Mode	✗ Not approved for any students	✓	✗	✗
Perplexity	✗ Not approved for any students	✓	✗	✗
Claude (Anthropic)	✗ Not approved for any students	✓	✗	✗

Definitions

Sensitive data refers to Special Category Data under UK GDPR: personal data, including information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, genetic or biometric data, and a person's sex life or sexual orientation. Personal data includes any information that identifies a student or staff member, even indirectly.

Appendix B: Student AI Use Flowchart

Can I use AI for this piece of work?

Follow these checks before you start.

1. **Has your teacher explicitly permitted AI use for this task?**
 - ☒ No → Do not use AI
 - ☒ Yes → Go to Step 2
2. **Is this a formally assessed task (e.g. coursework or exam)?**
 - ☒ Yes → AI use is not allowed unless you have prior approval from your teacher
 - ☒ No → Go to Step 3
3. **Will you clearly acknowledge how AI was used in your work?**
 - ☒ No → Do not use AI
 - ☒ Yes → Go to Step 4
4. **Is your intended use appropriate and within guidelines set out by your teacher?**
 - ☒ Generally appropriate examples:
 - Coming up with initial ideas
 - Using AI as a powerful search tool to surface articles, books, etc.
 - Generating quiz questions for study
 - ☒ Always inappropriate examples:
 - Copying or paraphrasing AI content and claiming it as your own
 - Using AI to complete essays or coursework
 - Relying on AI for any task meant to assess your own thinking or understanding

Appendix C: General Internal Classwork Suspicions of AI Misuse (to be applied in cases not involving coursework)

This appendix sets out the procedure for dealing with suspected AI misuse in **non-assessed classwork, homework, or prep**. It is designed to protect academic integrity while ensuring a fair, proportionate, and educational response. It applies only to internal academic work and does not cover formal assessments or coursework, which are dealt with under Appendix D.

C1. Responsibility

- The teacher is responsible for dealing with suspected cases in the first instance
- These cases are generally treated as academic issues rather than pastoral or disciplinary matters, unless there is persistent or deliberate misuse.

C2. Grounds for Suspicion

Teachers may reasonably suspect AI misuse where:

- The style, vocabulary, or structure differs significantly from the student's usual work
- The content is implausible, overly generic, or irrelevant to the task
- References are fabricated, inconsistent, or missing
- Work includes common "artefacts" of AI-generated content, such as American spellings, disclaimers, or generic phrasing.

C3. Teacher Actions

If misuse is suspected, the teacher should:

- Log incident on CPOMs
- Refrain from marking the work for assessment until the matter is clarified
- Retain a copy of the work in question and, where possible, collect earlier drafts or related classwork for comparison
- Arrange a supportive discussion with the student to explore the matter.

C4. Student Discussion

The discussion should be **academic in nature** and focused on establishing facts rather than assigning blame. The teacher should:

- Ask the student to explain how the work was produced
- Clarify whether AI was used, and if so, how
- Request drafts, notes, or any relevant records (such as prompts or screenshots) where appropriate
- Regardless of whether the student admits AI use, use the opportunity to:
 - Reinforce expectations around appropriate and inappropriate uses of AI.
 - Model how AI can be used responsibly (for brainstorming, research directions, etc.) versus how it undermines authentic learning.

C5. Outcomes

✓ Work is authentic

- The work is accepted and no further action is required.

⚠ AI was used but not acknowledged

- The student must revise the work to include proper acknowledgement (tool, date, brief explanation)
- The teacher records the incident for monitoring.

✗ Work not the student's own (clear evidence or student cannot demonstrate understanding)

- The student must redo the work independently
- The incident is logged and may be referred to the Head of Department or Director of Studies if repeated.

? Concerns remain but not proven

- The work may be accepted, but the teacher should:
 - Note the concern
 - Have an educational conversation with the student about responsible AI use
 - Monitor future work more closely.

C6. Escalation

Minor or isolated issues are normally resolved by the teacher as an academic matter, with an emphasis on education.

If there are unresolved concerns without clear evidence, the teacher should note the issue and continue to monitor future work, but no formal escalation is required at this stage.

Escalation to the Head of Department or Director of Studies is appropriate where:

- There is clear evidence or admission of significant AI misuse
- There is a pattern of repeated concerns, even if not fully proven in each case
- This procedure does not involve reporting to awarding bodies, as it applies only to internal classwork outside of formal assessment.

Appendix D: Process to be Followed in Cases of Suspected Misuse of AI (JCQ coursework)

This appendix outlines the internal process for teachers to follow when they suspect a student has misused Artificial Intelligence (AI) in a piece of work (and in the case of coursework before the authentication declaration has been signed).

It is designed to protect academic integrity, align with JCQ guidance, and ensure consistency and fairness in decision-making.

D1. Identifying Potential AI Misuse

Teachers may have reasonable grounds to suspect misuse where:

- The style, structure, or vocabulary differs markedly from the student's usual work
- Content appears unusually generic, sophisticated, or inconsistent with the task brief
- American spelling or formatting appears by default
- There is a lack of verifiable sources or references
- References appear to be fabricated or AI-generated
- Content includes disclaimers, generalisations, or artefacts typical of AI output.

AI-generated content is often confident, plausible, and fluent, but may also include errors, contradictions, or overly formulaic structures. Familiarity with a student's work and regular formative engagement are the best tools for identifying inconsistencies.

D2. Teacher Actions

If a teacher suspects that a student has misused AI, the following actions must be taken:

- Do not accept the work for assessment at this stage
- The teacher must:
 - Save a copy of the work in question
 - Where possible, collect earlier drafts or classwork for comparison
 - Notify the Head of Department, the Director of Studies, and the Director of Innovation.
- Where it is helpful, teachers may compare:
 - Style, vocabulary, tone, and complexity with the student's past work
 - Use of references, citations, and subject-specific understanding
 - The logical progression of ideas or unusual shifts in tone or format.

D3 AI Detection Tools

The school does not endorse the use of AI detection tools (e.g. Turnitin AI Detector, GPTZero, Copyleaks) as a basis for determining academic misconduct. This reflects several important concerns:

- AI detection tools have not been proven to be reliably accurate
- False positives and false negatives are common
- There are known biases, especially affecting students for whom English is an additional language
- These tools cannot reliably distinguish between acknowledged and unacknowledged AI use.

D4. Student Discussion

A supportive, non-disciplinary meeting should be arranged with the student and teacher (and where appropriate, another staff member) to:

- Ask the student to explain how the work was produced
- Clarify whether AI tools were used, and if so, how
- Request any relevant materials such as:
 - AI prompts and responses (screenshots preferred)
 - Research notes or drafts
 - References and citations.

This meeting is intended to establish facts and clarify intent, not to apportion blame.

D5. Determining Authenticity

The teacher, in consultation with the Head of Department, the Director of Studies, and the Director of Innovation if needed, should assess whether:

- The student's explanation aligns with the content of the work
- The student can credibly demonstrate understanding of their arguments
- The work follows naturally from prior drafts or class performance
- Any AI use is within permitted bounds and appropriately acknowledged.

D6. Outcomes

✅ Work is authentic

- Proceed with assessment. No further action required.

⚠️ AI was used but not properly acknowledged

- The student must revise the work to include:
 - Name of the tool and date used
 - Screenshot or non-editable record of AI output
 - A brief explanation of how the tool was used
- The revised version may then be accepted for assessment.

❌ Work is not the student's own

- The student must redo the task independently
- The incident is logged with the Director of Studies and the Director of Innovation
- In relation to coursework, no external report is required unless the student has already signed a declaration of authenticity.

D7. Cases Identified After Signing of Authentication

If concerns about AI misuse arise after a student has signed the authentication declaration:

- The teacher must notify the Head of Department, the Director of Studies, and the Exams Officer immediately.
- In accordance with the JCQ Suspected Malpractice: Policies and Procedures:
 - The case must be formally reported to the relevant awarding organisation using the appropriate forms and evidence
 - No further marking or resubmission should take place until a response has been received from the awarding body.
- Staff involved should refer to the full JCQ guidance for detailed procedures, documentation requirements, and possible outcomes.

Appendix E: Sustainability

As a school community, we expect all members to act with awareness of environmental sustainability. While AI can support creative, academic, and administrative work, it also raises important questions about energy and water consumption. It is therefore important that staff and students consider whether AI is the most efficient and environmentally responsible tool for the task at hand. These issues are directly addressed as part of the Responsible Tech strand of the school's Digital Futures Programme.

Although research in this area is still developing and data is not always fully transparent, current evidence suggests that progress is being made in reducing the environmental footprint of AI systems. For example, some providers have reported significant improvements in efficiency per prompt over the past year.

Recent independent estimates indicate that, on average in 2025:

- A single text-based AI prompt typically uses approximately 0.0003 kWh of energy. This is roughly comparable to 8–10 seconds of Netflix streaming or the energy used for a Google search in 2008
- Image generation tasks appear to use a similar amount of energy per request.

Water usage is even harder to measure consistently, as the amount depends on the provider, cooling technology, and data-centre location. Estimates range from 0.25 mL to 5 mL of water per prompt, from a few drops to around one-fifth of a shot glass.

The school will continue to monitor emerging research in this area and update guidance as greater clarity becomes available. As part of responsible AI use, staff and students are encouraged to:

- Use AI only where it adds clear educational or operational value
- Keep prompts concise and purposeful
- Avoid unnecessary image-generation or repeated queries
- Consider lower-impact alternatives where appropriate (e.g. traditional research methods, peer discussion, or local computational tools).

Appendix F: SPGS AI Documentation & Critical Reflection Sheet

This reflection sheet is available to students and staff in Word format and should be completed and submitted alongside any assignment where AI use is permitted and forms part of the learning process. It supports transparency, academic integrity, and critical engagement with AI tools.

Student Name:

Subject:

Assignment Title:

Date Submitted:

Part 1: AI Use Documentation

Did you use any Generative AI tools (e.g., Microsoft Copilot) to assist with this assignment?

☐ Yes ☐ No

If yes, in which aspects of the assignment did you use AI? (Tick all that apply)

- ☐ Initial idea generation
- ☐ Research / information gathering
- ☐ Summarising information
- ☐ Outlining / structuring the work
- ☐ Proofreading or clarity checking
- ☐ Feedback on drafts of specific sections
- ☐ Writing or producing elements
- ☐ Other (please specify):

Part 2: Reflection on AI's Contribution

Describe the most valuable contribution AI made to your work.

Part 3: Limitations and Mitigation

What specific limitations, inaccuracies, or biases did you encounter when using AI for this task? How did you correct or overcome these limitations?

Part 4: Learning and Future Use

How, if at all, would you adjust your use of AI in a similar assignment in future?

Teacher Feedback and Assessment

Select the category that best describes the student's engagement with AI in relation to learning goals:
Exemplary: Demonstrates sophisticated and reflective use of AI; shows creativity and discerning judgement; articulates benefits and limitations clearly.

Strong: Thoughtful and responsible engagement; uses AI effectively; clear awareness of strengths and weaknesses.

Satisfactory: Basic documentation and reasonable reflection; shows general understanding of how AI supported the task.

Needs Improvement: Limited or vague reflection; little evidence of critical judgement, originality, or understanding of AI's role.

Additional Teacher Comments (if applicable):