Appendix 8 - Generative AI Policy

We encourage the informed and responsible use of authorised AI applications.

This policy aims to provide a robust framework for the ethical and responsible use of generative AI technologies within Initio Learning Trust. Its intent is to empower both educators and learners by integrating AI into teaching, learning and administrative processes, while emphasising responsible and safe use, inclusivity and high ethical standards.

Breach of this policy will be treated as a disciplinary offence which may result in disciplinary action under the Trust's Disciplinary Policy and Procedure up to and including summary dismissal depending on the seriousness of the breach.

This policy does not form part of any individual's terms and conditions of employment with the Trust and is not intended to have contractual effect. Changes to data protection legislation will be monitored and further amendments may be required to this policy in order to remain compliant with legal obligations.

Definitions

Generative AI technologies (GenAI) - Generative AI technologies are described by the ICO and the UK government as using non-human systems to imitate human intelligence. Types of generative AI include:

- Conversational AI - e.g. Alexa, Siri, Google Assistant
- Text generative AI - e.g. Microsoft CoPilot, Google Gemini, ChatGPT, Arbor AI
- Image based generative AI - e.g. DALL-E, StyleGAN
- Audio and music generative AI - e.g. Jukebox
- Video generative AI - e.g. Invideo

Chatbot - A software application used to conduct an online chat conversation via text, instead of providing direct contact with a live human agent.

Users - All staff and students in Initio Learning Trust who utilise generative AI technology

Ethical Use of Generative AI

Staff

Staff are expected to model responsible and ethical use of generative AI technologies.

Staff **must**:

- Use AI technologies in a manner that enhances teaching and learning, without compromising academic integrity;
- Inspire creativity and original thinking among students, rather than for direct content creation;
- Oversee the correct application of these technologies within the organisations operations;
- Prioritise the protection of data and respect for privacy;
- Use appropriate discretion and due diligence to assess whether information obtained from generative AI tools infringes upon any third party rights (for example, branding, logos or third party academic output) and refrain from using such material. The trust will not be responsible for any infringing use;
- Ensure AI tools are employed in a secure manner that benefits the community; and
- Review AI generated or AI assisted content for accuracy before it is published.

Staff **can:**

- Use Arbor AI to assist staff to generate official student or parent-facing correspondence; and
- Use Arbor AI to assist staff to generate reports that go to students or parents.

Staff **must not**:

- pass off AI-generated work as their own but acknowledge to colleagues and students alike the extent of AI assistance, and where possible give the sources that the AI model used;
- Use AI to impersonate individuals or organisations in a misleading or malicious manner, or to generate content that is unlawful, harmful, or offensive;
- Use generative AI tools to resolve emotionally or socially complex problems or other sensitive issues (for example, medical diagnoses or wellbeing concerns) in a school context;
- Give an AI model any personal or professional information about themselves, the trust, school, other staff members, students or their families;
- Use generative AI to make student or other workplace-related decisions that could have significant educational, legal, social or other similar effects (for example, disciplinary, academic assessment, or employment-related decisions);
- Input any proprietary and/or confidential information into AI belonging to the trust or trust schools, other members of staff, or students. Such information includes, but is not limited to, financial materials, images of the trust/school materials, academic materials, other intellectual property, or commercial information; or
- Use AI tools to mark or help assess work without being transparent about this both to the student(s) concerned on each occasion and to the Head of Department (or line manager if a HoD).

The table below lists some potential uses of generative AI by staff and the considerations required.

Staff Use	Considerations
Drafting ideas for lesson plans and other activities	The output may be factually incorrect or lack sound pedagogical foundations. Nonetheless, it may be a useful starting point.
Help with design of quiz questions or other exercises.	Generative AI can quickly generate multiple choice quizzes and assessment ideas, but they should be reviewed carefully as above.
Customising materials (simplifying language, adjusting to different reading levels, creating tailored activities for different interests)	Generally, when asked to customise material, generative AI won't introduce new concepts, and so is less likely to introduce factually incorrect information
Providing custom feedback to pupils.	Generative AI should not be used to mark pupil work.
Writing reports.	The trust expects all reports, including those generated by generative AI, to be reviewed by teachers.
Detecting whether work is written by AI	ChatGPT claims it can detect whether it wrote text. This is not correct.
Anything involving personal information	Never put personal information into any generative AI services like ChatGPT or built in chatbots

Source: Generative Al -A Primer (JISC) Vl.1 May 2023, updated February 2024.

Students

Students must use generative AI in a manner that respects our academic and ethical principles.

Students must:

- Acknowledge the sources of AI-generated content - non attribution of AI help/content in exam work, which may count towards an external qualification (e.g. coursework), is malpractice and may have to be reported to the exam board, leading potentially to disqualification from that unit, that qualification or all qualifications with that exam board.
- Use AI to support, rather than replace, their original thinking and creativity.

- Verify the accuracy of information received from any AI sources (including search engines) used.
- Maintain confidentiality in their interactions with AI tools and not disclose any confidential or personal information about themselves or any other people to the AI model since the information may be in the public domain and accessible to others.
- Be mindful of the rights of any third parties and avoid infringing those rights, for example by using trademarks or other content.
- Make efforts to trace the sources that the AI tool used to generate the response where possible (and students should be encouraged to do so accordingly).

Students **must not** use generative AI to:

- Cheat, plagiarise, or adopt any other unethical behaviour.
- Impersonate individuals or organisations in a misleading or malicious manner, or generate content that is unlawful, harmful, or offensive.
- Substitute for effort or original work. Students are required to put in their own effort to understand the material and produce unique content.
- Submit or otherwise publicise trust/school materials using AI tools. Such materials include, but are not limited to, past papers, textbooks, worksheets, curriculum materials, pastoral information, and other school materials.
- Advise on emotionally/socially complex problems or other sensitive issues (for example, medical diagnoses or wellbeing concerns).

Students who breach this policy may face disciplinary action by the school.

The table below lists some potential uses of generative AI by students and the considerations required.

Student Use	Considerations
To formulate ideas, for example, creating essay structures	Generative AI tools are generally effective in producing outlines as a starting point for an assignment
To provide feedback on writing	Generative AI will proofread and correct text for students, in a similar way to grammar tools. It will also provide feedback on style and content. Students will need clear advice on when this should be declared
As a research tool	A good understanding of the tool and its limitations is crucial here, particularly the tendency for generative AI to give misinformation
Generating images to include in assignments	The best image-generation tools come at a cost, and students need to be aware of copyright concerns

Source: Generative Al -A Primer (JISC) Vl.1 May 2023, updated February 2024.

Plagiarism and Originality

Users must not represent AI-generated content as their own work. Users may use AI to help generate ideas and structure assignments, but the critical analysis, reasoning and argument should be demonstrably their own. Examples of AI misuse include, but are not limited to:

- Copying or paraphrasing sections of AI generated content so that the work is no longer their own;
- Copying or paraphrasing whole responses of AI-generated content;
- Using AI to complete parts of an assessment so that the work does not reflect the student's own work, analysis, evaluation or calculations;
- Failing to acknowledge use of AI tools when they have been used as a source of information;
- Incomplete or poor acknowledgement of AI tools; or
- Submitting work with intentionally incomplete or misleading references.

Generative AI should enhance original contributions, not replace them. This provision ensures that all stakeholders, including teachers, support staff and students, use generative AI technologies ethically and responsibly. As we navigate the digital age, we reaffirm our commitment to uphold our core values and promote a culture that respects academic integrity and champions original thinking.

Accessibility and Inclusivity

We aim to ensure that generative AI technologies are used in a way that benefits all users, irrespective of their abilities, teaching practice or learning styles. Our commitment to equal opportunities remains a priority in our educational approach to generative AI.

Monitoring and Evaluation

Any discrepancies or inconsistencies found in AI-generated content must be reported and rectified. The appropriateness of AI-generated content must be assessed against the trust's curriculum standards, ethical guidelines, and the diverse cultural and personal backgrounds of our staff and students.

We reserve the right to monitor all content on any AI applications used for business purposes. This will only be carried out by the school to comply with a legal obligation or for our legitimate business purposes, in order to:

- prevent misuse of the content and protect confidential information (and the confidential information of our students, staff or other stakeholders);
- ensure compliance with our rules, standards of conduct and policies;
- ensure that staff do not use AI for any unlawful purposes or activities; and
- comply with legislation for the protection of intellectual property rights.

All stakeholders are encouraged to provide feedback on their experiences, potential areas of improvement, and any concerns with the generative AI tools utilised. This feedback guides the modification and improvement of AI tools for enhanced learning outcomes.

Data Privacy, Security and Compliance

In line with our commitment to ethical conduct and best practices, we adhere rigorously to the UK General Data Protection Regulation (UK GDPR), the Data Protection Act (DPA) and other relevant UK laws for the safe and responsible handling of data within generative AI technologies. The trust is aware of the responsibility to be transparent about such usage and will update this policy as and when needed and in line with our Data Protection Policy.

AI is used for legitimate purposes, such as enhancing learning experiences and improving administrative efficiency. Data collected for AI processes is limited to that which is necessary for the stated educational or administrative purpose. A data protection impact assessment (DPIA) will be carried out prior to the adoption of any AI system where personal data may be required.

We will ensure there are reasonable appropriate technical measures in place to safeguard and protect data in AI systems. These measures include encryption, secure network infrastructures, controlled access permissions, and regular security audits. Regular training is conducted for staff, particularly those who interact directly with generative AI technologies, designed to equip them with the skills required to handle data responsibly and to recognise potential data protection issues proactively.

Data used or generated by generative AI tools will be anonymised where possible and stored securely. Retention periods will be kept to an absolute minimum, with data deleted once it has served its purpose and is no longer required. Individuals have the right to access their personal data processed by these technologies, as well as the right to correct inaccurate or incomplete information.

Continuous Learning and Policy Improvement

As generative AI continues to evolve, the trust will provide ongoing training and resources for staff, ensuring they understand how to use generative AI technologies and incorporate them into their teaching methods effectively and ethically. At the same time, students will be educated on the ethical use and potential of generative AI in learning.

This policy will be reviewed at least annually to reflect new knowledge, learning, and best practice in the field of generative AI in education. This will ensure that the trust remains at the forefront of technological advancements in education, leveraging the significant benefits of generative AI to deliver enriched, engaging, and personalised learning experiences for all our students.

JCQ (UK Exam Board) Guidance on use of AI in Assessments

These are extremely strict and staff working in subjects with non-exam assessments (NEA) at any level should read the whole policy and familiarise themselves with the contents (as may be amended from time to time): JCO-AI-Use-in-Assessments-Protecting-the-integrity-of Qualifications.pdf

The document's executive summary outlines the salient points which staff must bear in mind:

"While the potential for student artificial intelligence (AI) misuse is new, most of the ways to prevent its misuse and mitigate the associated risks are not; centres will already have established measures in place to ensure that students are aware of the importance of submitting their own independent work for assessment and for identifying potential malpractice. This guidance reminds assessors of best practice in this area, applying it in the context of AI use".

The guidance emphasises the following requirements:

- As has always been the case, and in accordance with section 5.3(j) of the JCQ General Regulations for Approved Centres all work submitted for qualification assessments must be the candidates' own;
- Candidates who misuse AI such that the work they submit for assessment is not their own will have committed malpractice, in accordance with JCQ regulations, and may attract severe sanctions;
- Candidates and centre staff must be aware of the risks of using AI and must be clear on what constitutes malpractice;
- Candidates must make sure that work submitted for assessment is demonstrably their own. If any sections of their work are reproduced directly from AI generated responses, those elements must be identified by the candidate and they must understand that this will not allow them to demonstrate that they have independently met the marking criteria and therefore will not be rewarded (please see the Acknowledging AI Use section of the full policy);
- assessors must only accept work for assessment which they consider to be the candidates' own (in accordance with section 5.3(j) of the JCQ General Regulations for Approved Centres); and
- Where they have doubts about the authenticity of candidates' work submitted for assessment (for example, they suspect that parts of it have been generated by AI but this has not been acknowledged), they must investigate and take appropriate action.

The JCQ awarding organisations' staff, examiners and moderators have established procedures for identifying, reporting and investigating pupil malpractice, including the misuse of AI.

The JCQ awarding organisations are continuing to monitor developments in this area and will update this guidance when appropriate. The Examinations Officer will alert staff to any updated guidance as and when necessary.

Current approved genAI tools

- Microsoft CoPilot
- Google Bard
- Gemini for Google Workspace (limited to staff)

Systems we use with built in genAI

- Arbor AI (OpenAI) (limited to staff)
- Meta (Facebook/Instagram)(LLaMa 2)
- Tassomai Mai Tutor (ChatGPT)
- Oak National Academy (Alia for use with ChatGPT 4)
- The National College (limited to staff)
- Iris Connect (limited to staff)

AI tools to be updated as and when new systems are approved or removed.

AI Principles and Practice

Legal Compliance

- We use AI at all levels in accordance with legal obligations, including, but not limited to, data protection law, intellectual property rights and confidentiality obligations.
- We never input personal, confidential, financial or similar private data into AI systems and tools.
- We do not use AI to make student or work-place decisions that could have a significant legal, educational, contractual, social or other similar effect.

Transparency and Empowerment

- We are transparent and accountable in our use of AI decision-making processes and do not pass off AI generated content as our own, acknowledging the extent of AI assistance and citing AI sources.
- We empower users to understand and control AI systems by offering customisation options for opting out and clear processes for sharing feedback and resolving grievances.
- Our AI usage will be subject to appropriate human direction and control.
- We put in place accountability measures to ensure that AI initiatives adhere to ethical principles and uphold societal values. These include ethical use and best practice guidelines, policies and review boards.

Ethical Use

- We continue to monitor and evaluate AI systems to detect and address biases, inaccuracies or unintended consequences.
- We anticipate and mitigate against long-term societal impacts of AI adoption, such as economic inequality and shifts in power dynamics, and proactively address these challenges through policy, education and social support systems.

Academic Rigour and Integrity

- We seek to combine the best of what AI can do with the creativity, understanding, curiosity and intuition that only humans are currently capable of.
- We understand that AI can be incorrect or inaccurate and apply academic principles to AI generated content.

Equality and Inclusivity

- We use AI to broaden communities, bridge the digital divide and create a supportive and inclusive AI culture**.**
- We recognise the global nature of AI deployment and ensure that our AI initiatives respect international norms and standards.

Mental Health

- We are mindful of the potential for AI to impact both positively and negatively on mental health.
- We support each other to use AI responsibly and adopt a holistic approach that combines exploring the potential of AI alongside empathetic human interaction.

Responsible Innovation and Environmental Sustainability

- We consider the potential benefits and trade-offs associated with AI, including the environmental aspect of AI consumption, such as energy consumption and carbon footprint.
- We use AI responsibly and thoughtfully and strive to minimise AI resource usage and contribute to environmental sustainability wherever possible.

Shared Learning and Public Engagement

- We share the excitement of ongoing research, development and creating ethical guidelines around new AI tools as they emerge.
- We embrace AI opportunities to work together as independent creators, and not just content reproducers.
- We foster collaboration between AI experts, educators and other relevant stakeholders to ensure holistic understanding of AIs impact and to develop comprehensive solutions that address diverse perspectives and concerns.
- We promote public awareness and encourage dialogue about AI technologies to better understand their capabilities, limitations, potential implications and societal impacts.