

# Use of Artificial Intelligence Policy

Oxford International College

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### 1. Aims and scope

Here at Oxford International College we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for colleges. 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.

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

This policy covers the use of AI tools by college staff, governors and students. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

This policy is intended to complement the Nord Anglia Education AI Policy by defining the local implementation of its requirements within Oxford International College.

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 students 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 students
- › Protect the privacy and personal data of staff, governors and students in compliance with the UK GDPR

#### 1.1 Definitions

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

- > **Free/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
- > [Generative artificial intelligence \(AI\) and data protection in colleges](#), published by the Department for Education (DfE)

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 the [AI regulation white paper](#).

REGULATORY PRINCIPLE	WE WILL ...
Safety, security and robustness	<ul style="list-style-type: none"> <li>• Ensure that AI solutions are secure and safe for users and protect users' data</li> <li>• Ensure we can identify and rectify bias or error</li> <li>• Anticipate threats such as hacking</li> </ul>
Appropriate transparency and explainability	<ul style="list-style-type: none"> <li>• Be transparent about our use of AI, and make sure we understand the suggestions it makes</li> </ul>
Fairness	<ul style="list-style-type: none"> <li>• Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate</li> </ul>
Accountability and governance	<ul style="list-style-type: none"> <li>• Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI</li> </ul>
Contestability and redress	<ul style="list-style-type: none"> <li>• Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology</li> <li>• Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment</li> </ul>

## 4. Roles and responsibilities

### 4.0 AI leads

Our generative AI lead is Dr Sarah Watson (principal). They are responsible for the day-to-day leadership, ownership and management of AI use in the college.

Our AI champion is Peter Burnett (head of computing and digital learning). They are responsible for developing strategy, aiding with updates to policies, AI evaluation and staff training.

The IT department is responsible for technical implementation and system security, the Data Protection Officer (DPO) for data protection compliance, and the Designated Safeguarding Lead (DSL) for safeguarding considerations

### 4.1 Governing board

The governing board will:

- › Take overall responsibility for monitoring this policy and holding the principal to account for its implementation in line with the college's AI strategy
- › Ensure the principal and AI leads are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the college
- › Adhere to the guidelines below to protect data when using generative AI tools:
  - Adhere to the Nord Anglia AI policy
  - Use only approved AI tools (see section 5 and appendix 1)
  - Seek advice from the data protection officer / IT / AI lead and the designated safeguarding lead, 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
  - Check results to make sure that the information is accurate

### 4.2 Principal

The principal will:

- › Take responsibility for the day-to-day leadership and management of AI use in the college
- › Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- › Liaise with the DSL to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the college's child protection and safeguarding policy
- › Ensure that the guidance set out in this policy is followed by all staff
- › Review and update this AI policy as appropriate, and at least annually
- › Ensure staff are appropriately trained in the effective use and potential risks of AI
- › Make sure students are taught about the effective use and potential risks of AI
- › Sign off on approved uses of AI, or new AI tools, considering advice from the DPO, AI leads, and data protection impact assessments
- › Ensure that a DPIA is completed before procuring or deploying any commercial or paid AI tool.
- › Ensure that comprehensive technical and pedagogical risk assessments are conducted

### 4.3 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 Jay Quee and is contactable via [dpo@oxcoll.com](mailto:dpo@oxcoll.com).

### 4.4 IT

The IT department is responsible for the secure implementation, configuration and monitoring of AI technologies used within the college, in line with the Nord Anglia Education AI Policy.

This includes:

- Managing the technical environment in which AI tools operate (e.g. Microsoft 365 tenant, devices, networks and filtering systems)
- Ensuring appropriate access controls, permissions and security configurations are in place for approved AI tools
- Supporting the deployment and integration of approved AI systems within the college
- Monitoring for unauthorised, unsafe or non-compliant use of AI tools (including use of non-approved systems)
- Advising on technical risks, system security and compatibility when new AI tools or use cases are proposed
- Supporting staff in the safe and effective use of approved AI tools (e.g. Microsoft Copilot)
- Responsible for the deployment, approval and ongoing monitoring of AI agents and automated AI systems, ensuring they operate securely, within defined permissions, and in line with organisational policy.

The IT department will work closely with the Principal, AI leads, DPO and DSL to ensure that AI use within the college is secure, compliant and aligned with organisational policy.

### 4.5 Designated safeguarding lead (DSL)

The DSL is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- › 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) and the college's child protection and safeguarding policy
- › Understanding the filtering and monitoring systems and processes in place on college devices
- › Ensure that real-time content-aware filtering is implemented on college devices

The college's DSL is Severine Collins and is contactable via [severine.collins@oxcoll.com](mailto:severine.collins@oxcoll.com).

### 4.6 All staff

As part of our aim to reduce staff workload while improving outcomes for our students, we encourage staff to explore opportunities to meet these objectives using approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- › Adhere to the Nord Anglia AI policy
- › Check that access to the tool is not prohibited in the country you are working in
- › Use work email addresses when using open AI tools at work
- › Disable chat history and model training
- › Check whether data is prohibited before entering and don't enter data if unsure
- › Use only approved AI tools (see appendix 1)
- › Seek advice from the data protection officer / IT / AI lead, as appropriate
- › Report safeguarding concerns to the DSL in line with our college's child protection and safeguarding policy
- › 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, this includes personal data, company-owned confidential or business sensitive data and third-party-owned confidential information
- › Acknowledge or reference the use of generative AI in their work
- › Check results to make sure the information is accurate

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

## 4.7 Students

Students must:

- › Follow the guidelines set out in section 7 of this policy ('Use of AI by students')

# 5. Staff and governors' use of AI

## 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 remain the professional responsibility of the person who produced it.

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.

Always consider whether AI is the right tool to use. Just because the college has approved its use doesn't mean it will always be appropriate.

## 5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve student outcomes and reduce workload. Staff should contact the AI leads and IT to discuss any ideas they may have with regards to using AI, so the principal can take the suggestions forward if they deem it to be a satisfactory new method of working.

The principal is responsible for signing off on approved uses of AI, or new AI tools, considering advice from AI leads, the DPO, and the IT department and data protection impact assessments.

### 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, Oxford International College will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Please refer to the college's data protection policy and section 10 of this policy.

### 5.4 Reputational damage

Staff must not upload any material that could negatively reflect on the college or organisation. Extra care must be taken when uploading anything that contains the name of the college or organisation.

### 5.5 Intellectual property

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

Students own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

Student's work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright.

Staff and governors should obtain the permission of other staff and governors before uploading any material that is their intellectual property.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

### 5.6 Bias

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

We will ensure we can identify and rectify bias or error by training staff in this area.

We also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or students have any concerns or complaints about potential unfair treatment or other negative outcomes because of AI use, these will be dealt with through our usual complaint procedure.

### 5.7 Raising concerns

We encourage staff and governors to speak to the principal 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.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with our child protection and safeguarding policy.

### 5.8 Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output
- Fact and sense-check the output before relying on it

Staff and governors 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
- › Input anything that could negatively reflect on the college or organisation

## 5.9 Agentic AI

Agentic AI is a form of AI that can carry out task autonomously, for example reading and replying to emails. This type of AI could be extremely damaging and cause data breaches. Staff must not install agentic AI on their college devices without express permission. They must not give agentic AI access to college data without permission.

## 6. Educating students about AI

Here at Oxford International College, we acknowledge that students 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 students develop the right skills to make the best use of generative AI.

Students will be taught about the potential benefits of using AI tools to aid learning through assemblies, in lessons by teachers and through the student handbook.

This will include guidance on:

- › 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

## 7. Use of AI by students

We recognise that AI has many uses to help students learn.

Students may use AI tools where age restriction and legal frameworks permit:

- › As a research tool to help them find out about new topics and ideas
- › When specifically studying and discussing AI in college work, for example in computer science lessons
- › As a learning tool, for example to revise a topic or give feedback on work

All AI-generated content must be properly attributed and appropriate for the students' age and educational needs.

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

- › During assessments, including internal and external assessments, and coursework
- › To write their homework or 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)

This list of AI misuse is not exhaustive, please also refer to the Academic Malpractice Policy.

Where AI tools have been used as a source of information, students should 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 plagiarism and will follow our plagiarism procedures as set out in the Academic Malpractice Policy.

Students 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 or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of students
- Input offensive, discriminatory or inappropriate content as a prompt

## 8. Using AI to support students with additional needs.

Artificial Intelligence can be used by teachers, staff and students to help those that require additional support. AI should be used to help teachers create differentiated resources and by students as an additional aid to learning.

AI can be used in the following areas:

### ➤ 1. Improving Reading & Access to Information

➤ Using AI assisted readers and translators:

- Text-to-speech
- Simplified or levelled reading
- Chunked text and visual supports
- Translation and picture dictionaries

### ➤ 2. Supporting Writing & Organisation

➤ Planning and expressing ideas by providing:

- Writing frames and sentence starters
- Essay plans
- Converting notes into full sentences
- Speech-to-text
- Analysing handwriting

### ➤ 3. Executive Function Support

➤ Reduce the feeling of being overwhelmed and increase independence by producing:

- Step-by-step task breakdowns
- Visual schedules
- Checklists, reminders, infographics and mind maps
- Coaching and guidance tools

### ➤ 4. Memory & Revision Tools

➤ More effective study habits:

- Automatic flashcards and quizzes
- Multiple formats (audio, diagrams, simplified summaries)
- Personalised revision schedules
- Coaching and guidance tools

## 9. Formal assessments

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

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

## 10. Staff training

Staff will receive training through INSET sessions, staff meetings, tailored CPD sessions. Updates and reminders will also be made via the school bulletin.

## 11. Referral to our child protection and safeguarding policy

The college is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- › Sexual grooming
- › Sexual harassment
- › Sexual extortion
- › Child sexual abuse/exploitation material
- › Harmful content
- › Harmful advertisements and promotions
- › Bullying

Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the college's child protection and safeguarding policy and child protection referral.

## 12. Breach of this policy

### 12.1 By staff

Breach of this policy by staff will be dealt with in line with our staff code of conduct

Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- › During or outside of working hours
- › On an individual's own device or a college device
- › At home, at college or from a remote working location

Staff members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- › The generative AI application in question (whether it is one authorised by the college or not)
- › Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the principal immediately.

## 12.2 By governors

Minor breaches: Unintentional or low-risk non-compliance (e.g. failure to disclose AI use in a report).

Major breaches: Deliberate misuse, ethical violations, or actions that compromise student data, institutional integrity, or regulatory compliance.

Governors can be required to step down for major breaches of this policy. For minor breaches they will be expected to take additional AI training.

Governors will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- › The generative AI application in question (whether it is one authorised by the college or not)
- › Any relevant passwords or login details

## 12.3 By students

Any breach of this policy by a student will be dealt with in line with our behaviour policy.

# 13. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by the AI leads whenever there is a significant change to either AI use by the college 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 at least annually.

All teaching staff are expected to read and follow this policy. The principal is responsible for ensuring that the policy is followed.

The AI champion lead will monitor the effectiveness of AI usage across the college.

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

# 14. Links with other policies

- This AI policy is linked to our:
- Acceptable Use IT Students policy
- Code of conduct policy
- Data Breach Policy
- Data Protection Policy
- Disciplinary Policy
- Equality and Diversity Policy
- Health and Safety Policy
- Online Safety Policy
- Promoting good behaviour, sanctions and discipline policy

- Risk Assessment Policy
- Safeguarding and Child Protection Policy

This policy is aligned with the Nord Anglia AI Policy version 1.0 as published 29<sup>th</sup> June 2023. However, there are some minor differences.

1. This policy does not require that staff confirm with their line manager that they have checked everything they generate with AI. In an environment with the increasing accuracy of generative models together with frequent and wide-spread use of AI tools, this is considered an unnecessary burden. Instead, staff are reminded that they are responsible for the accuracy of any material generated and have a duty to check it before use.
2. The Nord Anglia policy prohibits the uploading of anything with the school or organisation's name. This has been replaced with a restriction on uploading any material that could negatively reflect on the school or organisation.

## Appendix 1: Approved uses of AI tools (table)

Note that open-source AI tools / open AI tools, meaning tools that anyone can access and modify, should only be used for tasks that don't require personal information to be input.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
Microsoft Copilot	<ul style="list-style-type: none"> <li>• Staff</li> <li>• Governors</li> </ul>	<p>Notes:</p> <p><i>All use must be lawful, e.g. within copyright law and GDPR.</i></p> <p><i>All AI generated material must be checked by the member of staff for accuracy, bias and inappropriate content before any use with students.</i></p> <p>Uses:</p> <ul style="list-style-type: none"> <li>• Producing educational resources, e.g. slides, notes, podcasts, images, quizzes, assessments, flashcards etc.</li> <li>• Analysing data, e.g. internal and external exam results</li> <li>• Analysing student work, e.g. EPQ reviews</li> <li>• Planning lessons and activities</li> <li>• Marking exams/homework and providing feedback on student work</li> <li>• Manipulating files, e.g. summarising, extracting, splitting and merging files. (Subject to any relevant copyright restrictions.)</li> <li>• Producing marketing materials</li> <li>• Writing academic reports (subject to limitations: all reports must be carefully checked for accuracy and to ensure that they are personalised to a reasonable extent relative to the teacher's knowledge of the student.)</li> <li>• Any other relevant, lawful activity that is part of the member of staff's job description, providing that the activity is not explicitly banned within this or any other policy document.</li> </ul>

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
	<ul style="list-style-type: none"> <li>• Students</li> </ul>	<ul style="list-style-type: none"> <li>• Students of any age may use this tool for educational purposes.</li> <li>• They may use it for research and to aid learning.</li> <li>• Use in work must be referenced clearly.</li> <li>• Any use must be in line with the Academic Malpractice policy.</li> </ul>
Other generative AI tools	<ul style="list-style-type: none"> <li>• Staff</li> <li>• Governors</li> </ul>	<ul style="list-style-type: none"> <li>• Staff and governors may use AI for legitimate purposes in relation to their work, provided they follow the Nord Anglia and college policies concerning the type of data that can be entered</li> </ul>
	<ul style="list-style-type: none"> <li>• Students</li> </ul>	<ul style="list-style-type: none"> <li>• Students may use AI tools if they meet the criteria for the tool, including age requirements.</li> <li>• They must not enter personally identifiable information for any third party.</li> <li>• They must not enter company-owned confidential or business sensitive information.</li> <li>• They should not enter their own personal information.</li> <li>• Any use must be permitted under all other policies, including the Academic Malpractice policy.</li> </ul>
Other tools required for AI trials	Anyone approved for tool use as part of an approved trial.	<ul style="list-style-type: none"> <li>• Tools can be used for the purposes specified in the trial documentation only.</li> <li>• All use must comply with this policy unless exemptions have been authorised in writing by the principal.</li> </ul>