



*Achieving together in faith*

## **Holy Cross Catholic MAC**

### **Artificial Intelligence 2025 / 2026**

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## **1. Introduction and aims**

Artificial Intelligence (AI) technologies are becoming a fundamental integration within organisations across the world, including educational settings. AI technologies can be used as tools to streamline and enhance teaching and learning experiences, administrative processes, and prepare pupils for a technologically advanced society. This policy focuses on the allowed AI use and integration within the MAC

These technologies offer valuable opportunities but also raise important considerations related to data protection, ethical use, privacy, and security.

This policy aims to:

- Promote the responsible use of AI in teaching and learning, while ensuring transparency and fairness in its application
- Provide clear guidelines on the appropriate use of AI within the MAC
- Establish expectations for how all members of the MAC community engage with AI tools and systems
- Support the MAC's policies on data protection, online safety, and safeguarding, ensuring that AI usage aligns with these principles
- Minimise risks associated with the misuse or unethical application of AI technologies

This policy applies to all users of AI systems within the MAC, including directors, governors, staff, pupils, volunteers, contractors, and visitors. Any violations of this policy may be addressed in accordance with the MAC's Codes of Conduct.

## **2. Relevant legislation and guidance**

This policy refers to, and complies with, the following legislation and guidance:

- [Generative artificial intelligence \(AI\) in education \(DfE\)](#)
- [National AI Strategy - GOV.UK](#)
- [Data Protection Act 2018](#)
- [The General Data Protection Regulation](#)
- [The Information Commissioner's Office \(ICO\) - Artificial Intelligence](#)
- [Computer Misuse Act 1990](#)
- [Education Act 2011](#)
- [Keeping Children Safe in Education](#)

### 3. Monitoring, Review and Related Policies

The CEO, CFOO, DCOO, Headteacher and ICT/Office Manager monitor the implementation of this policy including ensuring that it is updated to reflect the needs and circumstances of the MAC and individual schools.

This policy should be read alongside the MAC/school's policies on:

- IT Policy
- Safeguarding and child protection
- Behaviour
- Staff Code of Conduct
- Data protection

### 4. Definitions

- **“Artificial Intelligence” or “AI”** – The simulation of human intelligence processes by machines, especially computer systems, encompassing learning, reasoning, and self-correction.
- **“Generative AI”** – A subset of AI that focuses on creating new content, such as text, images, or music, based on learned patterns from existing data.
- **“Machine Learning (ML)”** – A branch of AI that enables systems to learn from data and improve their performance over time without explicit programming.
- **“Microsoft Copilot” or “Copilot”** – A generative AI tool that is integrated within Microsoft systems and accounts.

### 5. Use of AI by Staff (including Directors, Governors, Volunteers, and Contractors)

#### 5.1 General Use and Responsibility

- Staff may use AI technologies and tools to support tasks such as lesson planning, marking, feedback, report writing, professional development, facilities management and administrative tasks. AI should enhance, not replace, professional judgment.
- Staff remain accountable for the quality and accuracy of AI-generated content. AI output must always be reviewed and refined as necessary.
- AI use should comply with ethical and legal standards. Staff must not use AI tools or MAC/school data for personal gain or in violation of applicable laws.

#### 5.2 Training and Professional Development

- Staff will receive training and support to integrate AI effectively into their teaching and/or administrative work. Training and support will be planned as part of professional development and/or appraisals, or on an as-needed basis.

- Staff are responsible for identifying their AI training needs and should discuss them with their line manager to ensure responsible and effective use.

### **5.3 AI in Teaching and Learning**

- Staff are permitted to use AI to support in creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. Teaching staff should tailor AI-generated materials to meet specific learning objectives.
- Pupils may use AI for self-assessment and feedback, but staff must oversee this process, ensuring AI complements rather than replaces teacher or peer assessment.

### **5.4 AI in Marking**

- Staff are permitted to use automated marking for objective assessments (e.g., multiple-choice, fill-in-the-blank), allowing staff more time for individual pupil support. AI technologies and tools may assist with marking factual assessments (e.g., multiple-choice or fill-in-the-blank questions), allowing staff more time for individual pupil support.
- AI can provide feedback on subjective responses, but staff must verify and refine AI-generated marks to ensure accuracy, especially in open-ended assessments.

### **5.5 AI in Pupil Reports and Progress Analysis**

- AI can assist with writing pupil reports, but staff must review and personalise AI-generated content to ensure accuracy and alignment with their own observations and assessments.
- AI tools can help analyse pupil attainment trends, but final evaluations and feedback must rely on staff expertise. Staff remain key decision-makers in assessing pupil progress holistically.
- Staff should be transparent about AI use in reports or evaluations, clearly indicating where AI has contributed and what professional review or modifications have been applied.

## **6. Use of AI by Pupils**

### **6.1 Responsible and Ethical Use**

- Pupils will be encouraged to explore AI through age-appropriate projects that promote knowledge-building, problem-solving, data analysis, and creative expression.
- A culture of responsible AI use will be fostered by discussing topics such as data privacy, bias, safeguarding, and the social impact of AI.

- Pupils must not input personal, sensitive, or confidential information into AI tools, ensuring their data privacy and security.

## **6.2 Safeguarding and Online Safety**

- The MAC will ensure pupils are protected from harmful AI-generated content, including deepfakes and impersonation materials, as part of safeguarding policies.
- AI technologies and tools will be assessed for age-appropriateness and educational suitability before being introduced to pupils.
- Staff will be trained to recognise AI-related risks and guide pupils on safe AI use.
- Filtering and Monitoring of AI Tools, The MAC will ensure that all AI tools accessible to pupils are subject to robust filtering and monitoring systems, in line with DfE standards. These systems will be reviewed at least annually, and staff will be trained to understand and manage these provisions.
- The MAC will refer to and comply with the DfE's Generative AI: Product Safety Expectations when selecting and implementing AI tools, ensuring that all products meet the required standards for filtering, monitoring, and safeguarding.
- Any concerns or incidents involving the misuse of AI, exposure to harmful content, or safeguarding risks will be reported and escalated in line with the MAC's safeguarding and child protection procedures.

## **6.3 AI Education and Curriculum Integration**

- AI literacy will be incorporated into the curriculum to help pupils understand AI's capabilities, limitations, and ethical considerations.
- Pupils will be taught how to critically assess AI-generated content, identifying reliable sources and evaluating accuracy.
- AI tools may be integrated into various subjects and year groups, providing hands-on learning opportunities and skill development.

## **7. Potential Misuse of AI**

AI presents valuable opportunities for learning and innovation, but its misuse can undermine academic integrity, assessment fairness, and online safety. This section outlines the risks associated with AI misuse and the measures in place to ensure pupils use AI responsibly, ethically, and in line with the MAC policies and external regulations.

## 7.1 Academic Integrity and Responsible Use

- Pupils will be educated on ethical AI use, including the risks of over-reliance on AI for assignments, coursework, or homework. They will be encouraged to be transparent about AI-assisted work.
- Staff will reinforce the importance of critical thinking, creativity, and originality, discouraging plagiarism and academic dishonesty. Clear guidelines on AI use in assessments will be communicated to ensure pupils' work reflects their own understanding.
- Key messages about responsible AI use will be embedded in the Computing Curriculum and reinforced in all subjects where work contributes to external grading.

## 7.2 AI Use in Assessments

- The MAC will comply with guidance from the Joint Council for Qualifications (JCQ) and individual exam boards regarding AI use in assessments, ensuring all regulations are followed.

<https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/>

## 7.3 Safeguarding Against AI Manipulation

- Pupils will be educated on the risks of AI being misused for deception, such as impersonation and deepfake technology. They will be taught how to recognise and respond to AI-generated threats, particularly in online interactions, for example interaction with others who are not who they claim to be but who can imitate who they claim to be using AI technology.

## 8. Ethical Use of AI

The use of AI technologies, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Whether staff are using AI for teaching or school administrative purposes, or with pupils who will make use of these technologies, they should be mindful of, and instruct pupils about, the following considerations:

- **Bias** – data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socioeconomic background.
- **Accuracy** – information may be inaccurate when generated so any content should be fact-checked.



- **Currency** – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

## **9. Data Protection Implications of Using AI**

Compliance with data protection regulations and principles is essential across the MAC, and this also extends to the use of AI technologies in handling data. The following must be considered:

- Staff and pupils should be aware that any information entered into most Generative AI models is no longer private or secure. The exception of this is utilising Microsoft Copilot through the MAC account, Copilot data is not shared.
- Staff and pupils must not enter any personal information (personal data, intellectual property or private information (including commercially sensitive information, such as contracts) into any Generative AI model.
- Staff should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.
- Staff who wish to utilise new or emerging AI tools must ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required and follow the MAC Data Protection Policy and Data Protection Impact Assessment (DPIA) Procedure.
- When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment (DPIA) to be carried out.

## **10. Data Protection Impact Assessment (DPIA)**

Any DPIA or assessment of the data protection aspects of the use of AI will include:

- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.
- What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.
- A clear indication where AI processing and automated decisions may produce effects on individuals.
- Consideration of both individual and allocative harms (for example, where the harm results from a decision to not permit a pupil to take a certain subject at

GCSE or A Level) and representational harms (for example, selecting groups of pupils for different interventions results in gender or racial bias).

- How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.
- An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
- If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy in order to justify the use of the AI tool in the DPIA.
- If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
- Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
- The potential impact of any security threats.
- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders.
- Whether processing is intentionally or inadvertently processing special category data- there are many contexts in which non-special category data is processed, but infers special category data (for example, where a postcode infers a particular race).
- A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

## **11. Cybersecurity**

The MAC will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are correctly reported to Senior Leadership and that the Cyber Response Plan is activated.

- Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.
- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.