

Artificial Intelligence (AI) Policy

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Approved by	The MILL Executive

The MILL Academy (the Trust) is a school trust currently comprising of: The Henry Box School, Queen Emma's Primary School and Finstock Church of England Primary School. The MILL Academy Trust is run by a Board of Trustees. The MILL Academy Trust endeavours to provide the best education possible for all of its pupils in an open and transparent environment.

1. DEFINITIONS

- Artificial Intelligence (AI): An umbrella term for a range of algorithm-based technologies that solve complex tasks by carrying out functions that previously required human thinking alone ^[2].
- Generative AI: AI technology that can be used to create new content based on large volumes of data that models have been trained on. This can include audio, code, images, text, simulations, and videos. ^[4]
- Large Language Model: AI technology that generates human-like text by predicting the likelihood of a word given its context.
- Hallucinations: AI hallucination is when an AI model creates inaccurate or nonsensical outputs.

2. PRINCIPLES, AIMS AND OBJECTIVES

This policy is in addition to, not in place of, other relevant policies including but not restricted to; GDPR policy, acceptable use policy, examinations policy, safeguarding policy, malpractice policy.

The aim of this policy is to support and guide staff, pupils, governors, volunteers, and visitors use of AI in line with the following regulatory principles ^[2]:

- *Safety, security and robustness*, personal data must be protected.
- *Transparency*, it should be clear where AI is being used.
- *Fairness*, AI bias (esp against groups with protected characteristics) must be avoided.
- *Accountability and governance*, AI is always to be subordinate to professional judgment.
- *Contestability and redress*, appeals should be possible where AI errors may have resulted in adverse consequences or unfair treatment.

Given the pace of development in AI the effect these new technologies are having on the lives of children and learners is still poorly understood ^[2]. Accordingly, we aim to keep this policy as current as possible by reviewing it annually, keeping it in line with relevant published research and best practice guidance.

3. POLICY

This policy is informed and underpinned by the Joint Council for Qualifications (JCQ) guidance on the use of AI in assessments ^[1] and Ofsted's approach to AI ^[2]. Ofsted's statutory guidance for schools and colleges on safeguarding children and safer recruitment ^[3] as well as the Department for Education's policy paper 'Generative artificial intelligence (AI) in education' ^[4].

In line with this guidance the Trust and its schools will:

- Assure themselves that AI solutions are secure and safe for users and protect users' data.
- Ensure they can identify and rectify bias or error.
- Be transparent about their use of AI, and make sure they understand the suggestions it makes.

- Only use AI solutions that are ethically appropriate – in particular to consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.
- Ensure that providers and their staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI (set out below).
- Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology.
- Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.
- Ensure students intellectual property rights are respected and their works not entered into AI platforms other than the schools Microsoft Copilot accounts.
- Protect students personal information, not entering this into AI platforms other than the schools Microsoft Copilot accounts.

Personal information includes but is not limited to:

- Full names
 - Addresses
 - Phone numbers
 - Protected characteristics
 - Assessment data
 - Contact information
 - SEND information
- Seek guidance from the trust's operations director about the suitability of any AI platforms they intend to use with students work.

4. EDUCATIONAL USES OF AI

The educational uses of AI are manifold and ever increasing. It is expected that staff and students will engage with these new technologies in line with the regulatory principles described above. The following exemplars describe some of the current uses of generative AI and demonstrate the application of those principles.

Educational use	Principle
Use of AI to create teaching resources.	<ul style="list-style-type: none"> • In line with the principle of accountability teachers must check the suitability and accuracy of any AI generated content. Some AI chatbots have been identified as providing dangerous and harmful answers to questions and some can also produce fake references to books/articles by real or fake people • Teachers often use resources provided by others (exam boards, TES etc). There is no expectation that teachers create all their own resources so it is not necessary to acknowledge the use of AI in line with the principle of transparency. • In line with the principle of safety and security students' personal data must only be entered into AI tools which comply with GDPR legislation for example using Microsoft Copilot whilst signed in with a school account.
Use of AI to mark students work	<ul style="list-style-type: none"> • Outside of formal assessments (see below for separate guidance) AI tools can be used to provide relevant, timely feedback to students. In

Educational use	Principle
	<p>line with the principle of transparency it should always be clear when feedback is being provided by AI.</p> <ul style="list-style-type: none"> • In line with the principle of accountability, staff are responsible for ensuring the feedback students receive is relevant. • In line with the principle of safety and security, students' personal data must only be entered into AI tools which comply with GDPR legislation for example using Microsoft Copilot whilst signed in with a school account.
Use of AI to write communications	<ul style="list-style-type: none"> • Emails and letters might be drafted by generative AI but should always be checked by the sender, in line with the principle of accountability. • In line with the principle of safety and security, personal data (such as addresses) must only be entered into AI tools which comply with GDPR legislation, for example using Microsoft Copilot whilst signed in with a school account. • Parents expect reports to be written by teachers. Whilst AI tools might be used to check for grammatical errors, to send home reports largely produced by AI would not be in line with the principle of transparency.

5. USE OF AI IN FORMAL ASSESSMENTS ^[1]

Throughout this section of the policy, the terms assessor and teacher are used interchangeably.

AI misuse in formal assessments

AI misuse takes place when a student has used one or more AI tools but has not appropriately acknowledged this use and has submitted work for assessment when it is not their own.

Examples of AI misuse include, but are not limited to, the following:

- Copying or paraphrasing sections of AI-generated content so that the work submitted for assessment is no longer the student's own
- Copying or paraphrasing whole responses of AI-generated content
- Using AI to complete parts of the 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
- Submitting work with intentionally incomplete or misleading references or bibliographies.

AI misuse constitutes malpractice as defined in the JCQ Suspected Malpractice: Policies and Procedures (<https://www.jcq.org.uk/exams-office/malpractice/>).

Reducing the likelihood of AI misuse in formal assessments

When carrying out formal assessments teachers are recommended to:

- a) Consider restricting access to online AI tools on centre devices and networks.
- b) Ensure that access to online AI tools is restricted on centre devices used for exams.
- c) Set reasonable deadlines for submission of work and providing reminders.
- d) Where appropriate, allocate time for sufficient portions of work to be done in class under direct supervision to allow the teacher to authenticate each student's whole work with confidence.

- e) Examine intermediate stages in the production of work in order to ensure that work is underway in a planned and timely manner and that work submitted represents a natural continuation of earlier stages.
- f) Introduce classroom activities that use the level of knowledge/understanding achieved during the course thereby making the teacher confident that the student understands the material.
- g) Consider whether it's appropriate and helpful to engage students in a short verbal discussion about their work to ascertain that they understand it and that it reflects their own independent work.
- h) Do not accept, without further investigation, work which staff suspect has been taken from AI tools without proper acknowledgement or is otherwise plagiarised.
- i) Issuing tasks for centre-devised assignments which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models trained using historic data.

Using AI checkers

The use of AI detection tools will form part of a holistic approach to considering the authenticity of students' work.

The following AI detection tools are recommended^[1]:

- Copyleaks (<https://copyleaks.com/ai-content-detector>)
- GPTZero (<https://gptzero.me/>)
- Sapling (<https://sapling.ai/ai-content-detector>)

6. ROLES AND RESPONSIBILITIES

Exams office\centre

- The exams office will ensure that students are aware of the importance of submitting their own independent work for assessment and of identifying potential malpractice.
- The exams office will make sure its policies and procedures that ensure the authenticity of assessments also address the risks associated with AI misuse.
- The exams office will ensure that each student is issued with a copy of, and understands, the appropriate JCQ Information for Candidates (www.jcq.org.uk/exams-office/information-for-candidates-documents).
- The centre will confirm that teachers and assessors are familiar with AI tools, their risks and AI detection tools.
- The centre will make teachers aware that where they use AI tools to help mark student work an AI tool cannot be the sole marker. The AI tool used must avoid data privacy concerns, for example by using Microsoft Copilot ^[5] whilst signed in with a school account. That a human assessor must review all of the work in its entirety and determine the mark they feel it warrants, regardless of the outcomes of an AI tool. The teacher remains responsible for the mark/grade awarded.

Network manager

- The network manager will make sure that where students are using word processors or computers to complete assessments, teachers and relevant centre staff are aware of how to disable improper internet/AI access where this is prohibited.

Teachers

- Teachers and assessors must only accept work for qualification assessments which is the students' own.
- Teachers will take reasonable steps to reduce the likelihood of AI misuse (see above).

- Teachers will not use AI tools as the sole marker of student work.
- Teachers will make students aware of the appropriate and inappropriate use of AI, the risks of using AI, and the possible consequences of using AI inappropriately in a qualification assessment. Students will also be made aware of the centre's approach to plagiarism and the consequences of malpractice.
- Where teachers have doubts about the authenticity of student 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 as outlined in the centres malpractice policy.
- Where proper sourcing of AI is not submitted, and the teacher suspects that the student has used AI tools, the teacher will need to consult the centre's malpractice policy for appropriate next steps and should take action to assure themselves that the work is the student's own.
- Teachers, assessors and other staff must discuss the use of AI in qualification assessments they are delivering and agree their approach to managing students' use of AI in that assessment.
- Teachers must remind students that if they use AI, they may not have independently met the marking criteria and therefore will not be rewarded with marks.
- When marking student work in which AI use has been acknowledged, and there are no concerns of AI misuse, the assessor must still ensure that if the student has used AI tools such that they have not independently met the marking criteria, they are not rewarded.
- Depending upon the marking criteria or grade descriptors being applied, the assessor may need to take into account the failure to independently demonstrate their understanding of certain aspects when determining the appropriate mark/ grade to be awarded.
- Where such AI use has been considered, and particularly where this has had an impact upon the final marks/grades awarded by the assessor, clear records should be kept.
- If AI misuse is detected or suspected by a teacher and the declaration of authentication has been signed, the case must be reported to the relevant awarding organisation via the exams office. The procedure is detailed in the JCQ Suspected Malpractice: Policies and Procedures (<https://www.jcq.org.uk/exams-office/malpractice/>).

Students

- Students 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 student 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
- If a student uses an AI tool which provides details of the sources it has used in generating content, these sources must be verified by the student and referenced in their work in the normal way. Where an AI tool does not provide such details, students should ensure that they independently verify the AI-generated content – and then reference the sources they have used.
- If students use AI, they must acknowledge its use and show clearly how they have used it. The student's acknowledgement must show the name of the AI source used and should show the date the content was generated. For example: ChatGPT 3.5 (<https://openai.com/blog/chatgpt/>), 25/01/2024. The student must retain a copy of the prompt(s) and computer-generated content for reference and authentication purposes, in a noneditable format (such as a screenshot) and provide a brief explanation of how it has been used.

7. SAFEGUARDING CONCERNS ^[3]

Content

- Students should be aware that AI bias may expose users to racism, homophobia, misogyny or anti-Semitism.
- Students should be aware that the propensity of AI to hallucinate may expose students to fake news stories or images including deep fake pornography.

Contact

- Students must maintain confidentiality in their interactions with AI tools and must not disclose any confidential or personal information about themselves or any other people to the AI model as the information may be in the public domain and accessible to others.
- Students should not use AI tools for advice on emotionally/socially complex problems or other sensitive issues (for example, medical diagnoses or wellbeing concerns) as AI could expose students to illegal, inappropriate, or harmful content, for example about self-harm or suicide.

Conduct

- AI tools must not be used to impersonate individuals or organisations, in a misleading or malicious manner, or to generate content that is unlawful, harmful, or offensive.
- Use of AI tools and data/content created using such tools must comply with the schools anti-bullying policy.
- Students should report any inappropriate content, contact or conduct they are exposed to through their use of AI tools to their teacher, tutor, parent or trusted adult. Alternatively, a report could be made via the school intranet.
- Staff should report any inappropriate content, contact or conduct students are exposed to through their use of AI tools to a DSL who may refer it to the ICT team via the helpdesk.

8. BIBLIOGRAPHY

Reference URLs	
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