Mae'r ddogfen hon hefyd ar gael yn Gymraeg

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Artificial Intelligence (AI) policy

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1.0	September 2025	Initial draft written informed by JCQ, JISC and Furze 2025	Digital Innovation Lead

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1. Scope and Purpose

1.1 This policy sets out the principles and procedures for the responsible use of Artificial Intelligence (AI) across the institution, covering both teaching and learning and professional services. It aims to safeguard academic integrity, learner wellbeing, equity of access, privacy and data protection, and environmental responsibility while promoting innovation and efficiency. The policy applies to all staff (teaching and professional services), students, contractors, and partners, and covers all forms of Generative AI (text, image, audio, video, code) as well as analytics and automation tools aligned to institutional systems.

1.2 This policy links to and must be read alongside the institution's Data Protection Policy (UK GDPR and Data Protection Act 2018), IT Security Policy, Safeguarding Policy, Assessment Policies, Equality, Diversity and Inclusion Policy, and Records Management and Retention Schedules. It is informed by sector guidance including Jisc's AI Maturity Toolkit for Tertiary Education (Jisc, 2025), JCQ guidance on AI use in assessments (JCQ, 2025), and the AI Assessment Scale and practical strategies proposed by Leon Furze (Furze, 2024).

2. Definitions

2.1 **Artificial Intelligence (AI):** Computer systems which perform tasks normally requiring human intelligence. In this policy, AI includes predictive analytics, machine learning systems and Generative AI (text, image, audio, video, code).

2.2 **Generative AI (GenAI):** Models capable of producing novel content. Examples include large language models (LLMs) for text, diffusion models for images, and multimodal systems combining text, image, audio, or video.

2.3 **AI Assessment Scale:** A planning tool that sets transparent expectations for permitted AI use in assessments, from Level 1 (No AI) to Level 5 (Full AI with critical engagement) (Furze, 2024).

2.4 **AI misuse (malpractice):** Any use of AI that violates this policy or awarding-body rules, including submitting work that is not the student's own; copying or paraphrasing AI outputs without clear acknowledgement; fabricating sources or data; discriminatory or unsafe deployment (JCQ, 2025).

2.5 **Data Protection Impact Assessment (DPIA):** A process to identify and minimise data protection risks for projects involving personal data, as required by UK GDPR Article 35 and ICO guidance.

2.6 **Policy owner:** The person responsible for developing, implementing and reviewing this policy.

3. Responsibilities

3.1 **Governors:** Approve this policy and receive periodic reports on AI adoption, risks and outcomes.

3.2 Principal and Senior Leadership Team: Provide strategic oversight, ensure compliance, resource staff development, and sponsor impact monitoring.

3.3 Directors/Heads (Teaching and Services): Ensure local adherence, nominate approvers, and coordinate DPIAs and equality/Welsh language checks.

3.4 Educators: Set assessment-level AI expectations, teach responsible use, design authentic tasks, and apply authentication strategies.

3.5 Professional Services Staff: Use AI ethically for operations, avoid entering personal data into public tools, and maintain audit logs of AI-supported processes.

3.6 Students: Follow declared AI permissions for each task, acknowledge use transparently, and ask for clarification where unsure.

4. Policy Statement

4.1 Academic Integrity

Academic outcomes must reflect authentic student understanding. Students must not misrepresent AI-generated content as their own work and must acknowledge any permitted use of AI (e.g., brief tool acknowledgements, prompts/outputs on request). If AI-generated sections are not clearly identified, those sections will not meet marking requirements and may constitute malpractice (JCQ, 2025).

Educators will model integrity, design assessments that minimise opportunities for misuse, and explicitly communicate permitted levels of AI use for each task using the AI Assessment Scale (appendix a). Generative AI is not inherently plagiarism; however, it can reproduce verbatim text in some cases. Reliance on AI-detection software is discouraged due to known false positives/negatives and bias; integrity is better supported through assessment design and transparency (Furze, 2024; Jisc, 2025; JCQ, 2025).

4.1.2 In line with the Joint Council for Qualifications (JCQ) guidance (April 2025), St David's Catholic College requires that all work submitted for examined assessments (including formal examinations and NEAs under exam conditions) must be the student's own unaided work.

- No AI tools may be accessed during formal examinations or other assessments held under exam conditions unless explicitly permitted by the awarding organisation.

- For coursework and NEAs, any AI-generated content must be clearly identified and acknowledged. Unacknowledged AI content will not meet marking criteria and may be treated as malpractice.

- Students must be prepared to produce prompts, drafts, logs or other evidence of their own authorship on request.

- Human markers/assessors retain final responsibility for grading and quality assurance. AI tools may support but never replace human judgement in marking or moderation.

- Misuse of AI (e.g. submitting AI-generated content as original work or breaching permitted conditions) constitutes malpractice and will be reported in line with JCQ regulations. Sanctions may include mark reductions, rejection of work or disqualification.

- All staff must ensure that access to unauthorised AI tools is blocked or restricted in exam conditions and that students are trained on these requirements.

4.2 Fairness, Equity and Safety

4.2.1 Student Safety and Dignity

AI adoption will prioritise student safety and dignity, including clear prohibitions on abusive, illegal or harmful uses (e.g. deepfakes).

4.2.2 Community Engagement

The institution will engage parents, caregivers and the wider community in AI literacy and safety to build awareness and resilience.

4.2.3 Equitable Access

Required AI tools should have accessible routes so that students are not disadvantaged by subscription costs or technical barriers.

4.2.4 Mitigating Bias

Educators and services will recognise and mitigate bias in AI outputs, especially for under-represented groups, and disclose where AI has been used in formal communications or reporting (UNESCO, 2021; OECD, 2021).

4.2.5 Copyright and Licensing

Staff and students must respect copyright and licensing restrictions of AI tools and generated content, ensuring compliance with UK copyright law.

4.2.6 Safeguarding and Communications

AI must not be used to profile or contact learners outside agreed channels; safeguarding policies apply equally to AI-enabled communications.

4.3 Environmental Responsibility

The institution recognises that AI systems have environmental impacts across their lifecycle from extraction of critical minerals to data-centre energy and water use. Where AI is adopted, staff should prefer efficient or pre-trained models, limit frequency and duration of training, select providers with credible renewable energy commitments, and consider credible carbon offsetting for residual emissions. (Patterson et al., 2021; Strubell et al., 2019).

4.4 St David's Catholic College Learners

Enhancing learning: AI tools may be used to personalise learning, provide timely feedback and support different learning styles, consistent with Jisc's view that AI can enhance personalised student experiences (Jisc, 2025). AI should not replace human interaction but should augment teaching.

AI literacy: Learners must receive guidance on responsible AI use, understand capabilities and limitations, know when AI use is permitted and learn to critically evaluate outputs.

Accessible and inclusive use: AI tools must be accessible to learners with disabilities and support both English and Welsh users. Alternative methods must be available where AI is unsuitable.

Documentation of AI use: When using AI in coursework or assessments, students should be prepared to supply prompts, outputs and tool details on request and make simple acknowledgements in submitted work (JCQ, 2025).

4.5 AI Application Approval System

All proposed AI uses (teaching or professional services) must be submitted via the AI Application Form. The form provides distinct pathways for Teaching Staff and Professional Services Staff.

Approvals are risk-based with a maximum four-week turnaround (faster for low-risk, no-personal-data cases). Where personal data may be processed, a DPIA screening must be completed and, if indicated, a full DPIA. Applications should include a brief purpose statement, expected benefits, environmental considerations, data protection considerations, and the proposed level of AI use where applicable (see Appendix A).

4.6 Evaluation Frameworks

Reviewers will evaluate applications using the following frameworks:

• Need/Potential Matrix — fit to need, ease of integration, learning curve, costs/efficiencies, evidence of effectiveness; scalability, roadmap, adaptability, community support, alignment with trends, long-term value (Furze, 2024).

• Horizon Quadrants — prioritise technologies with high immediate value while monitoring immature or speculative technologies.

• Wait Calculation — where rapid change suggests likely obsolescence, defer adoption until stable, ethical and sustainable options emerge.

4.7 Teaching Staff Guidance

For each assessment, teachers must set and communicate the permitted level of AI use (Appendix A) and design authentic tasks that incentivise original thinking and skill demonstration. Privacy must be safeguarded, personal/identifiable data must not be entered into public AI tools. Where AI is permitted, students must transparently

acknowledge any use. Avoid reliance on detection software; instead, use assessment design and authentication strategies to uphold integrity (see 3.1).

4.7.1 Staff must obtain students' informed consent before inputting any student work into an AI tool, even if the work contains no personal or identifiable information. Students have the right to refuse this and must not be penalised for opting out.

4.7.2 Any accidental entry of personal/identifiable data into an AI tool must be reported immediately to the Digital Innovation Lead and the Data Protection Officer.

4.8 Authentication Strategies

Use staged drafting, supervised checkpoints, short viva/discussions, and retention of drafts/notes to evidence learning. Require simple AI acknowledgements (tool names, dates) and, where proportionate, brief excerpts of prompts/responses. Adopt varied assessment formats (presentations, practical's, problem-solving) to reduce opportunities for inauthentic outsourcing.

4.9 JCQ guidelines

Staff should familiarise themselves with the current JCQ 'AI Use in Assessments' guidance and ensure classroom and assessment conditions prevent unauthorised AI use where prohibited.

4.10 AI Misuse (Malpractice)

All staff and students are required to use Artificial Intelligence (AI) responsibly and in accordance with this policy. Misuse of AI, including entering personal or identifiable information into unauthorised Generative AI tools, or presenting AI-generated content as original work is strictly prohibited. Any breach will be handled under the College's Disciplinary Policy and, for assessments, in line with current JCQ regulations.

Full details of the reporting process, investigation steps, and disciplinary procedures are set out in the accompanying AI Procedures document. All staff and students must familiarise themselves with these procedures.

4.11 Professional Services Guidance

4.11.1 Professional services may use AI to support administrative workflows, data analysis, communications and learner support. Staff must not input personal or sensitive data into public AI tools; where processing personal data is necessary, use institution-approved tools and complete DPIA screening. Maintain simple usage logs for transparency and audit; consider environmental impacts when selecting or configuring AI tools.

4.11.2 Any processing of personal or identifiable information in Generative AI systems without prior DPIA approval constitutes a data breach and will be managed under the College's Disciplinary Policy and Data Breach Policy.

5. Equality and Welsh Language Impact Assessment Statement

5.1 An Equality and Welsh Language Impact Assessment has been carried out for this policy, drawing on consultation with staff and students. The assessment indicates a positive or neutral impact across all protected characteristics. AI can improve accessibility by providing personalised feedback and assistive technologies. However, bias in datasets and language barriers can create negative impacts. Mitigation measures include mandatory bias testing, accessible design, regular monitoring and the provision of bilingual (English and Welsh) documentation. Policy materials will be translated into Welsh, and training sessions will be offered bilingually.

6. Communication and Storage

6.1 This policy is published on the staff platform and website (also available in Welsh and accessible formats). Updates are communicated via staff briefings and learner channels. Records related to AI applications, approvals, and monitoring will be stored in accordance with the Records Management

7. Monitoring and Reporting

7.1 Approved AI uses will be spot-checked for compliance with declared permissions and data protection safeguards. Programme leads will submit brief summaries of AI use and outcomes. For qualifications under JCQ, records must show how AI was permitted and acknowledged in assessment/marking, and suspected malpractice must be reported via awarding-body procedures. Environmental and equality impacts identified at approval will be reviewed annually; mitigations will be updated where needed.

7.2 Incidents of harmful or unsafe AI outputs must be reported immediately to the Digital Innovation Leader and Data Protection Officer, who will assess and escalate under the Data Breach Policy

8. Review and Continuous Improvement

8.1 This policy will be reviewed annually or sooner where legislation, technology or institutional risk changes. The AI Steering Group will consider feedback from staff, students and community stakeholders and incorporate sector guidance updates (e.g., Jisc and JCQ).

8.2 The AI Steering Group will include representation from teaching, professional services, safeguarding, data protection and student voice.

8.3 Updates to this policy and the Approved AI Tools register will be communicated via staff briefings, student bulletins and the intranet.

8.4 The institution will provide regular training on responsible AI use, data protection and environmental sustainability for staff and students.

8.4.1 AI Innovation and training

St David's Catholic College is committed to responsible innovation. The College will establish an "AI Innovation Sandbox" a secure environment where staff and students can trial emerging AI tools under controlled conditions. All sandbox activities will operate with clear ethical, safeguarding, and data-protection guardrails (aligned to UK GDPR, JCQ, and institutional policies). Outcomes and lessons learned will inform future adoption decisions.

8.4.2 AI Literacy and Professional Learning
The College will offer ongoing AI Literacy and Generative AI training for staff and students. This programme will:

- Build understanding of AI capabilities, limitations, and ethical considerations.

- Provide subject-specific exemplars of good practice.

- Support staff to design AI-enhanced teaching and assessments.

- Equip students to use AI critically and transparently.
  Training will be refreshed annually to reflect sector guidance (Jisc, JCQ) and emerging technologies.

8.4.3 AI Policy Chatbot
To improve access to institutional guidance, the College will develop an AI-powered chatbot trained on the official AI Policy and related documents. This tool will enable staff and students to obtain quick, accurate answers to policy questions, ensuring consistency and reducing administrative burden. The chatbot will be updated whenever the policy changes and will include links to full documents for reference.

8.4.4 Continuous Evaluation of Innovation

All innovation initiatives will be reviewed regularly for effectiveness, equity, and environmental impact. Feedback will be gathered from staff and students to inform improvements and ensure alignment with the College's mission and values
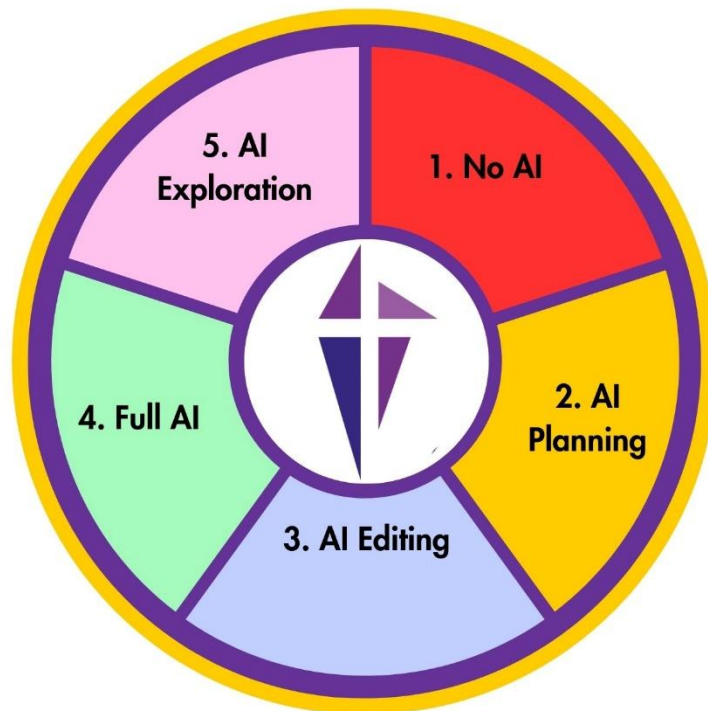
Level 1 – No AI: Learners complete work independently without AI. Suitable for demonstrating individual knowledge/skills (e.g., supervised in-class writing, viva).

Level 2 – Brainstorming/Outlining: AI may be used to generate ideas, plans or outlines. Learners develop outputs independently and acknowledge AI assistance.

Level 3 – Editing/Refining: AI may support grammar, clarity, structure, or visual editing. Learners submit original and revised versions plus brief acknowledgement.

Level 4 – AI + Critical Evaluation: AI produces drafts/analyses which learners critique, compare or refine, evidencing discernment and subject understanding.

Level 5 – Full AI with Critical Engagement: AI generates substantial outputs; learning focuses on evaluation, improvement and transfer. Clear acknowledgement required.

Perkins, Furze, Roe & MacVaugh (2024). The AI Assessment Scale

1	NO AI	Work is completed entirely without the use of AI. The assessment is completed entirely without AI assistance. Students must rely solely on their own knowledge, skills, and thinking **You must produce all aspects of your submission independently, without AI assistance.**
2	AI PLANNING	AI may be used for pre-task activities such as brainstorming, outlining, and initial research. This level focuses on the effective use of AI for planning, synthesis, and ideation, but assessments should emphasise the ability to develop and refine these ideas independently. **You may use AI for planning, idea development, and research. Your final submission should show how you have developed and refined these ideas.**
3	AI EDITING	AI may help refine, polish, or improve student-generated content (e.g. editing, language enhancement) but cannot generate brand new substantive content. **You may use AI to assist with specific tasks such as drafting text, refining and evaluating your work. You must critically evaluate and modify any AI-generated content you use.**
4	FULL AI + CRITICAL EVALUATION	AI may be used to complete any elements of the task, with students directing AI to achieve the assessment goals. Assessments at this level may also require engagement with AI to achieve goals and solve problems. **You may use AI extensively throughout your work either as you wish, or as specifically directed in your assessment. Focus on directing AI to achieve your goals while demonstrating your critical thinking.**
5	FULL AI EXPLORATION	AI may be used extensively throughout the assessment process (co-pilot mode). Students may integrate AI more freely. This level expects advanced critical literacy about AI, recognizing its limits, biases, and its interplay with student thinking.

Figure A1. AI Assessment Scale (current version). Use to set transparent expectations for each assessment.

References

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