



AI (Artificial Intelligence) Policy



Our Mission

We provide a **high-quality British style international education** in English, balancing tradition and innovation.

We aim to be the internationally recognized, **outstanding educational choice** for families in the region.

Our passion is creating a **positive, safe and nurturing learning environment** in which everyone is valued as individuals, empowering them to be versatile, motivated and caring people.

We will endeavor to **create opportunities** to develop creativity, collaboration and critical thinking skills through an **inclusive and personalized experience**.

Our Values

Excellence - We strive for excellence in everything we do.

Respect - We learn at school by showing respect to everyone in the community.

Responsibility - We are engaged in promoting actions and behaviours that support a sustainable future.

Integrity - We are transparent, honest and ethical in all our relationships.

Compassion - We are kind and caring, encouraging everyone to succeed.

Purpose of the policy

The purpose of this AI Policy is to ensure complete compliance with the EU AI Act. This policy will assist with the identification of the risk of using AI tools and how to respond directly to any risk identified. The policy aims to ensure there is human oversight and challenge mechanisms for any use of AI tools, and that there is sufficient transparency to the use of the tools. This policy is relevant to staff and students of BISL as well as parents and guardians of BISL students.

This policy should also be considered in conjunction with, and with reference to:

- Online Safety Policy
- Academic Honesty Policy
- Acceptable Use of IT Policy
- Protection of Data Policy

Overview

This policy provides an oversight of the use of AI at BISL, with the primary concern being the avoidance of any action deemed as high risk or prohibited under the EU AI Act. The policy clarifies where and how AI can be used by teachers and students, and where it should not be used.

In addition, the policy also considers the interaction between AI and data privacy/security, the identification of AI usage and frequency of the monitoring process. The policy seeks to ensure that the use of AI at BISL is transparent and that all users of AI are accountable in terms of how and why they use AI.



AI oversight at BISL

The Principal has the ultimate responsibility of the use of AI.

The school's AI Lead is responsible for any AI-driven decisions taken within the school.

- The AI Lead oversees AI monitoring, compliance and ethical use of AI tools.
- The AI Lead is trained in AI governance, GDPR compliance and bias detection.
- The AI Lead is responsible for delivering AI-literacy to staff, students and parents throughout the academic year or whenever deemed necessary by the SLT.
- As with any system that handles data, all use of AI tools within the school will be logged where possible to ensure that safe use of the technology is maintained and data is protected.

Student grades should not be determined by AI. Human oversight must occur in all final decisions.

AI must not be used as part of the Admissions process.

Parents, students and staff who wish to challenge any use of or decision made by an AI tool are able to submit their challenge to the AI Lead. The AI Lead, in conjunction with the Senior Leadership Team (SLT), will then assess the merits of the challenge and take necessary actions in line with the compliance regulations.

- All challenges submitted and the actions taken as a consequence must be transparent to the BISL community.

All matters related to the use of AI within BISL must be logged in accordance with the EU AI Act

- The school is defined as a deployer of AI.

Compliance Requirements

The EU AI Act defines actions with respect to AI use in terms of risk. At BISL, we must ensure we have a clear understanding of what can be considered high risk and prohibited AI in order to be avoided. High risk and Prohibited AI tools must not be used by teachers and/or students. To ensure that BISL students and staff are aware of what is considered high risk or is prohibited, the following procedures have been adopted:

- Students and staff are expected to consult with the AI Lead before using an AI tool to ensure that it is not high risk.
- Orbital Education's standard AI tool is Microsoft Copilot. While signed in with a group account (m365.cloud.microsoft/chat), Copilot can be used without requiring approval.
- Termly audits of AI tools in use carried out by the AI Lead
- The AI tools which are permitted to be used in the school will be governed by the school's senior leadership team (SLT) and the group governance team – as explained in Methods and Identification of AI Usage and Regularity of Process section of this document
- Scoring of risk in AI will align with EU AI Act. It will depend on several factors, such as how compliant the third-party software provider is with local or global regulations; how the app accesses, copies your data and where and who it shares it to; or whether or not they use the latest security standards.



Risk Level	Definition	Examples in Schools	Compliance Requirements
Minimal Risk	AI tools that pose little or no risk to rights or safety.	AI-powered spell checkers, grammar tools, scheduling assistants.	No regulatory requirements, but schools should ensure proper data handling.
Limited Risk	AI tools that influence learning or support decisions but do not make final determinations.	AI-generated lesson plans. Spam filters. AI translation tools.	Schools must ensure transparency. Students and staff should be informed when AI is used.
High Risk	AI that can significantly impact students' rights, education, or opportunities.	AI grading systems, AI admissions filtering, AI-driven student monitoring.	Requires human oversight, fairness checks, and transparency reporting. AI tools in this category may also need CE Marking and registration in the EU AI Database.
Prohibited AI	AI that manipulates behaviour, exploits vulnerabilities, or tracks emotions using biometric data.	AI emotion recognition in classrooms, social scoring of students, real-time biometric monitoring for discipline.	Banned under the EU AI Act. Schools must ensure no AI tools fall into this category.

The use of AI in Teaching, Learning and Assessment - Teachers

- AI tools can be used for the production of teaching materials including lesson plans, questions and assessments.
- AI tools can be used for the analysis of data, however this must be strictly restricted to the identification of patterns and the summary of data which has been authenticated beforehand.
- Any content produced by AI tools must be checked for authenticity and free of bias.
- Any "hallucinations" (see below for definition) that are produced by AI tools using large language models must be reported to the AI Lead.

Hallucinations

- *The new term "hallucinations" refers to the generation of incorrect or inaccurate information generated by AI tools.*
- *Hallucinations can occur as large language models (LLMs) use only their training to make interpretations and predictions.*



- *LLMs may also misinterpret the prompts that have been entered, thus producing text that does not directly respond to the intended query.*
- *Users must be aware of the risks of accepting the generated text and, therefore, must check all AI-generated text to ensure it correlates with the original enquiry.*
- BISL staff and students will be made aware, through AI-literacy training, of AI tools considered to be high risk and prohibited, and also which data should and should not be used with each tool. If staff or students become aware that a high risk or prohibited AI tool is being used, they should act according to the compliance requirement stated in this policy and report it to the AI Lead.

The use of AI in Teaching, Learning and Assessment – Students

- AI tools can be used for the purpose of research, revision and the clarification of responses to questions.
- It is prohibited for AI tools to be used to produce work that a student claims to be their own. AI can be used for research, and citations should be included in any research document or notes. However, work submitted for marking, feedback and/or grading, should be the students' own work. (see Academic Honesty Policy).
- Students must be aware of the imperfections of AI tools and that certain tools may produce content that is inaccurate or biased, known as “hallucinations” (see above).
- Any significant hallucinations that are produced by AI tools using large language models must be reported to the AI Lead.
- Any challenges to the use of AI tools from the perspective of either teachers or students should be reported to the AI Lead.

AI Data and Privacy Compliance

- The use of AI tools for processing the personal data of students, teachers, staff or parents within the BISL community is **expressly prohibited**.
- It is the responsibility of the SLT at BISL to ensure that all AI systems comply with GDPR and the EU AI Act.
- All data that is produced by AI tools must be treated responsibly, securely and transparently.
- Any data that is collected by AI tools must not be excessive and must be fully explained to staff, students and parents within the BISL community.
- Third party data sharing within AI tools is prohibited. Any AI tool that lacks sufficient encryption or security must be considered in terms of risk, and the correct compliance regulations must be applied. Such tools will not be permitted to operate within the school's systems.
- Appropriate time periods for the eventual deletion of any data collected by AI tools must be specified, according to the required needs of the data collected.

Methods and Identification of AI Usage and Regularity of Process

- Orbital Education's standard AI tool is Microsoft Copilot. While signed in with a group account (m365.cloud.microsoft/chat), Copilot can be used without requiring approval.
- The use of other AI tools will be checked termly in the form of an inventory/survey.
- A full AI audit will be conducted annually. This will also include a full compliance review.



- The AI Policy will be reviewed annually, and logs will be updated whenever a new AI tool is being used by staff or students at BISL
- The AI inventory/survey will determine which AI tools are being used and why they are being used, with the ultimate aim being to assign levels of risk to each tool and respond according to the relevant compliance regulation.
- In accordance with the EU AI Act, all BISL staff will be given AI-literacy training at least once a year, or whenever it is determined by the SLT to be needed during the academic year. This will be provided by the AI lead and it is the responsibility of everyone to ensure they have completed training before working with AI tools for school activities.
- A log of all AI tools used by staff will be kept, which will catalogue which tools are being used, what the purpose of the tools are, assigning risk to each tool and applying the appropriate compliance regulation to each tool.
- AI education will be provided for students by the AI Lead in PSHE, in order to critically assess AI-generated information and to gain an awareness of the imperfections of AI.
- Any requests for new AI tools must go through the Principal and the appropriate change approval process (i.e. DoA request endorsed by the Group e-Learning Manager and approved by the Group CTO), and a risk assessment carried out before use.

Bias Prevention

- Through AI-literacy training, teachers will be made aware that the use of AI systems for grading is considered high risk.
- Teachers are not permitted to use AI-generated outcomes to determine the educational path of any student at BISL.
- Teachers must always check AI-generated content for authenticity before presenting it to students.
- All BISL staff are made aware that the monitoring of student behavior or tracking and predicting future performance by AI tools is considered high risk and, therefore, should not be done.
- Admissions staff are prohibited from using AI tools to screen potential applicants to BISL.

Monitoring, Transparency and Accountability

- All AI use throughout the school by both staff and students should be monitored by the SLT, AI Lead and Group Technology Team.
- The use of AI tools should be clearly and regularly communicated to parents and guardians of BISL students.
- The use of AI tools should be transparent. Therefore, staff should be able to explain in full why certain AI tools have been used and how the tools being used are compliant with the AI EU Act.
- Teachers must be aware if any content produced by AI, due to prompts from either teachers or students, is inaccurate or biased.
- All media produced by AI, including deep fake media, must be clearly labelled as such by the teacher.
- Accountability for the use of AI in BISL falls to the Principal and the AI Lead.



Review and Evaluation

This policy is to be reviewed and evaluated **annually** by SLT, Principal and the RHoS.

Policy prepared by:	Jason Batson, AI Lead	13 th May 2025
approved by:	Mel Hitchcocks, Principal	13 th May 2025

Next Review by:	May 2026
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