Outcomes First Group

OFG AI Policy

Policy Folder: IT

OFG AI POLICY

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1.0 INTRODUCTION

The purpose of this Artificial Intelligence (AI) Policy is to ensure the ethical, safe, and effective use of AI and data technologies in the Group. This Policy aims to provide clear guidelines for all users—students, teachers, leaders, governors, central services and proprietors—on the appropriate use of AI and data technologies in the Group.

This Policy should be read in conjunction with:

- Acceptable Use of AI Policy
- Data Protection Policy

This Policy applies to all AI and data technologies used in the Group, whether they are used for teaching, learning, administration, or other school-related activities. This includes, but is not limited to, AI systems used for assessing work, generating content, personalised learning platforms, data analysis tools, and any other AI or data technologies implemented in the Group.

OFG is committed to leveraging the benefits of AI and data technologies to enhance teaching and learning while upholding our ethical responsibilities. We believe in the potential of these technologies to support personalised learning, improve educational outcomes, and streamline administrative processes. However, we also recognise the importance of using these technologies in a manner that respects privacy, promotes fairness, prevents discrimination and support learners ability to think critically and independently. This Policy provides the framework for achieving these goals.

2.0 DEFINITIONS

To ensure a clear understanding of this Policy, we provide definitions for key terms related to AI and data use in education. These definitions are based on the "Ethical Guidelines on the Use of Artificial Intelligence (AI) and Data in Teaching and Learning for Educators" document published by the European Commission in September 2022.

Artificial Intelligence (AI): AI refers to systems that display intelligent behaviour by analysing their environment and taking actions to achieve specific goals. In the context of education, AI can be used in various ways, such as assessing progress, personalising learning, and analysing educational data.

AI embedded within Applications: means that AI technologies such as machine learning, natural language processing, or predictive analytics are built into the core functionality of a software tool, enabling it to learn, adapt, or automate tasks intelligently as part of its normal operations

Generative AI: refers to a class of artificial intelligence models and systems designed to create new content—such as text, images, audio, video, or code—based on patterns learned from existing data

Data: In the context of this Policy, data refers to information collected about students' learning and behaviour in the educational environment. This can include grades, attendance, online activity, and other relevant information.

Ethical Use: Ethical use refers to the use of AI and data in a manner that respects individual rights, promotes fairness, and prevents discrimination. It also involves using these technologies in a way that is transparent, accountable, and respects privacy.

Privacy and Data Governance: This refers to the practices and procedures in place to protect the privacy of individuals and ensure the secure and ethical handling of data.

Technical Robustness and Safety: This refers to the reliability and safety of AI systems. It involves ensuring that these systems function correctly, are secure from cyber threats, and do not cause harm to users or Group, all AI systems must go through our Application and Supplier onboarding process, this ensures that meet our functional and non-functional requirements.

Human Agency and Oversight: This refers to the need for human involvement in the use of AI systems. It involves ensuring that decisions made by AI systems can be understood and overseen by humans, and that there are mechanisms in place for human intervention when necessary.

Societal and Environmental Wellbeing: This refers to the impact of AI and data use on society and the environment. It involves considering the broader implications of these technologies, including their potential effects on social interactions, wellbeing, and the environment.

3.0 ETHICAL USE OF AI AND DATA

OFG is committed to the ethical use of AI and data in all aspects of our business. We believe that these technologies can greatly enhance teaching, learning and central service functions, but they must be used in a manner that respects individual rights, promotes fairness, and prevents discrimination.

Ethical Considerations

When using AI and data technologies, we consider the following ethical principles:

- **Respect for individual rights:** We respect the rights of all individuals in our Group. This includes the right to privacy, the right to non-discrimination, and the right to an education that respects their individual needs and abilities.
- **Fairness**: We strive to use AI and data technologies in a manner that is fair and does not lead to discrimination or unfair outcomes. This includes ensuring that these technologies do not reinforce existing biases or create new ones.
- **Transparency:** We believe in the importance of transparency in the use of AI and data technologies. This includes being open about how these technologies are used, how decisions are made, and how data is collected and used.

Key Requirements for Trustworthy AI

In line with the "Ethical Guidelines on the Use of Artificial Intelligence (AI) and Data in Teaching and Learning for Educators" document, we adhere to the following key requirements for trustworthy AI:

- **Human agency and oversight:** We ensure that there is always a human in the loop when using AI systems, and that these systems are used to support, not replace, human decision-making.
- **Technical robustness and safety:** We use AI systems that are reliable, secure, and safe to use.
- **Privacy and data governance:** We have strong data governance practices in place to protect the privacy of our students and staff.
- **Transparency**: We are transparent about our use of AI and data technologies, and we provide clear explanations about how these technologies work and how decisions are made.
- **Diversity, non-discrimination, and fairness:** We use AI and data technologies in a manner that respects diversity, prevents discrimination, and promotes fairness.
- **Societal and environmental wellbeing**: We consider the broader societal and environmental

implications of our use of AI and data technologies.

4.0 AI AND DATA USE

In a School Setting

AI and data technologies are used in various ways in our schools to support teaching, learning, and administrative processes. For instance, schools typically process substantial amounts of educational data including personal information about students, parents, staff, management, and suppliers. This data is used for various purposes such as resource and course planning, predicting dropout, and guidance.

When students interact with digital devices, they generate digital traces such as mouse clicks, data on opened pages, the timing of interaction events, or key presses. This type of trace data is often used for learning analytics.

Examples of AI and Data Use in Education

Here are some examples of how AI and data technologies can be used in our schools:

- **Generative AI Applications:** These models provide responses to prompts. They are trained on large amounts of data and use this to generate new text and images. They can support teaching and learning by offering support in ideation, planning, organising and drafting.
- **Intelligent Tutoring Systems**: These systems provide individualised instruction or feedback to students without requiring intervention from the teacher. They follow a step-by-step sequence of tasks.
- **Language Learning Applications:** AI-based learning apps are used in formal and non-formal education contexts. They support learning by providing access to language courses, dictionaries, and provide real-time automated feedback on pronunciation, comprehension, and fluency.
- **Using Chatbots for Administrative Tasks**: A chatbot virtual assistant on the school's website guides learners and parents through administrative tasks such as enrolment into the school, paying course fees, or logging technical support issues.

In Central Services

AI and Data technologies are used in various ways in our Central Service Functions to support administration processes. For example, central functions process substantial amounts of educational, financial and staff data, including personal information about students, staff, management, customers and suppliers. This data is used for various purposed such as financial planning & management information to be used for decision making.

Examples of AI and Data use in Central Services

- **Generative AI Applications:** These models provide responses to prompts. They are trained on large amounts of data and use this to generate new text and images. They can support central functions by offering support in ideation, planning, organising and drafting documents or presentations

- **SaaS Applications with AI Tooling:** These platforms use Generative AI to automate or process large amounts of OFG data, the responses are not used to train the Generative AI Platforms.

5.0 USER RESPONSIBILITIES

Ethical and Responsible Use of AI and Data Technologies

All users of AI and data technologies within the Group are expected to use these technologies in a responsible and ethical manner. This includes respecting the rights of others, including their privacy and intellectual property rights, avoiding any actions that could lead to discrimination or unfair outcomes, and adhering to all relevant laws, regulations, school and Group policies. Users must ensure that their use of AI and data technologies does not lead to discrimination or unfair outcomes. This includes being aware of any potential biases in these technologies and taking steps to mitigate them.

Monitoring and Data Use Responsibilities

Users are responsible for monitoring the results produced by AI systems. This includes regularly reviewing these results to ensure they are accurate and fair and reporting any concerns or issues to the appropriate person or department. When using data technologies, users are expected to adhere to the school's data use policies and guidelines, always ensuring the privacy and security of data.

AI must not affect personal integrity of a staff member; the use of AI is not an excuse for poor quality work or lesson planning.

6.0 PRIVACY AND DATA GOVERNANCE

OFG is committed to protecting the privacy of our students, staff and community. We understand the importance of data governance in ensuring the ethical use of AI and data technologies. We adhere to all relevant laws and regulations regarding data protection and privacy, including GDPR.

Data Collection, Storage and Use

We collect, store and use data in a manner that respects individual privacy and is necessary for our educational and central services purposes. This includes:

- Ensuring that sensitive data is kept secure and access to the data is limited only to those who need it.

- Protecting and storing learner data in a secure location and using it only for the purposes for which the data was collected.

- Having mechanisms in place to allow teachers and school leaders to flag issues related to privacy or data protection.
- Informing learners and teachers about what happens with their data, how it is used, and for what purposes.
- Providing the possibility to customise privacy and data settings.
- Protecting and storing staff data in a secure location and only using it for the purposes for which the data was collected.

Data Protection

We have implemented measures to protect data from unauthorized access, use, disclosure, alteration or destruction. This includes technical measures such as encryption and access controls, as well as organisational measures such as staff, student training and policies

Data Access and Control

We respect the rights of individuals to access and control their data. This includes the right to access their data, the right to correct inaccurate data, the right to object to the processing of their data, and the right to have their data deleted in certain circumstances.

Data Sharing

We only share data with third parties when necessary for our educational purposes and in compliance with all relevant laws and regulations. We ensure that any third parties with whom we share data respect the privacy of our students, staff, and community and have appropriate measures in place to protect the data.

7.0 TECHNICAL ROBUSTNESS AND SAFETY

OFG is committed to using AI and data technologies that are technically robust and safe. We understand that the reliability and safety of these technologies are crucial for their effective and ethical use in our environment.

Ensuring Technical Robustness and Safety

We have put in place several measures to ensure the technical robustness and safety of AI Systems we use:

- **Security Measures:** We have security measures in place to ensure that the AI systems we use protect our data against data breaches. This includes both physical and digital security measures to protect our data from unauthorized access, use, disclosure, alteration or destruction.
- **Monitoring and Testing:** We have a strategy to monitor and test if the AI system is meeting the goals, purposes, and intended applications. This includes regular reviews of the performance and outcomes of AI systems, as well as audits of data collection, use, and protection practices.

- **Oversight Mechanisms:** We have appropriate oversight mechanisms in place for data collection, storage, processing, minimisation, and use. This includes having procedures in place to respond to any technical issues or incidents in a timely and effective manner.

- **Information Availability**: We make information available to assure students, parents and staff of the system's technical robustness and safety. This includes being transparent about how these technologies are used, how decisions are made, and how data is collected and used.

8.0 HUMAN AGENCY AND OVERSIGHT

OFG recognises the importance of human agency and oversight in the use of AI. We believe that AI should be used to support, not replace, human decision-making. We also believe that individuals should be able to understand and control how AI and data technologies affect them.

Maintaining Human Agency and Oversight in AI Use

We maintain human agency and oversight in the use of AI through the following guidelines:

- **Human-in-the-loop**: We ensure that there is always a human in the loop when using AI systems. This means that decisions made by AI systems are always subject to human review and intervention.

- **Transparency**: We are transparent about how AI and data technologies are used in our school. We provide clear explanations about how these technologies work, how decisions are made, and how data is collected and used.

- **Training and Support:** We provide training and support to all users of AI and data technologies in our school. This includes training on how to use these technologies ethically and responsibly, how to understand their outcomes, and how to respond to any issues or concerns.

- **Monitoring and Oversight:** We have procedures in place for the ongoing monitoring of AI and data use in our school. This includes regular reviews of the performance and outcomes of AI systems, as well as audits of data collection, use, and protection practices.

9.0 SOCIETAL AND ENVIRONMENT WELLBEING

OFG is committed to using AI and data technologies in a way that promotes societal and environmental wellbeing. We understand that these technologies have the potential to impact not only our school communities but also the broader society and environment.

Promoting Societal Wellbeing

We strive to use AI and data technologies in a way that benefits society. This includes:

- Ensuring that the use of these technologies does not harm individuals or society.
- Considering the social and emotional wellbeing of learners and teachers in the use of these technologies.
- Involving students and their parents in decisions about the use of these technologies.
- Using data to support teachers and school leaders in evaluating student wellbeing and monitoring this use.

Promoting Environmental Wellbeing

We are mindful of the environmental impact of AI and data technologies. We strive to use these technologies in a way that is sustainable and environmentally friendly. This includes considering the energy use of these technologies and seeking ways to minimise their environmental footprint.

10.0 STUDENT ETHICAL USE OF AI

Responsible Interaction with AI Systems:

- Students should interact with AI tools in an honest manner, avoiding any attempts to deceive or "game" the system.
- They must not misuse AI tools to generate inappropriate or misleading content.

Collaborative Learning with AI:

- Students should be encouraged to use AI as a tool for collaboration and not rely solely on it for answers.
- AI should be used to enhance critical thinking and problem-solving skills.

Respect for Privacy:

Students should be informed about the importance of data privacy and be discouraged from sharing personal or sensitive information with AI systems unless necessary for educational purposes.

AI in Research and Projects:

- When using AI for research or projects, students should give credit to the AI tool or platform they used.
- Students should be trained to critically evaluate the outputs from AI tools, recognising that these tools, while powerful, can still make errors or produce biased results.

11.0 AI LITERACY AND AWARENESS

AI Education for Students:

Schoos will provide students with foundational knowledge about AI, its capabilities, limitations, and ethical considerations.

Staff Training:

All Staff will receive training on the ethical and effective use of AI in teaching or non-teaching environments, ensuring they can guide students or make use of AI Tools appropriately and effectively.

12.0 NON-COMPLIANCE

If an employee is deemed to have violated this policy, they maybe subject to disciplinary action, up to and including termination of employment.

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