

## Artificial Intelligence (AI) Responsible Use Policy

St John's Lutheran Primary School Ltd has developed the following Artificial Intelligence (AI) Responsible Use Policy. The policy forms the foundation of the School's procedures, practices, decision-making processes and ultimately the School's culture with respect to the usage of artificial intelligence for School matters.

This aligns with the directions on policy management by Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT) to provide student safety, consistency, good governance and best practice in our system and School policy frameworks.

Our School is committed to the responsible and ethical use of artificial intelligence (AI) to enhance teaching, learning, and operational effectiveness. We believe that when used thoughtfully, AI can support student wellbeing, promote equitable outcomes, and prepare learners for a future shaped by emerging technologies. We aim to support teachers with ongoing training and guidance in this area by providing visual prompts (Appendix 1).

### Policy Objective

#### Scope

This Policy applies to all School staff, volunteers, contractors and students. It applies to School activities that occur on campus, offsite, online, extracurricular, sport activities and programs, excursions, camps, interstate and overseas travel.

This policy applies to the:

- Development, approval, use and management of AI software, systems or platforms developed or created for use by the school; and
- Approval, use and management of AI software, systems or platforms procured for use by the school.

This policy considers:

- Awareness, literacy and usage of AI in the learning and teaching approaches conducted across the school.
- Development, approval, use and management of AI software, systems or platforms developed or created for use by the school.
- Approval, use and management of AI software, systems or platforms procured for use by the school.

AI is a rapidly evolving technology, which provides a significant opportunity for enhanced productivity, automation, and improvement. The School acknowledges, however, that due to its ongoing and rapid advancement, this also presents risks which the School will seek to monitor and mitigate as appropriate. This policy will be continually updated to reflect the increasing changes to application and regulation that are anticipated.

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## Purpose

This policy sets out requirements for schools that choose to explore the use of generative artificial intelligence (AI) tools. It provides advice for School leaders and teachers around how to use generative AI tools in a safe and responsible way, as well as advice on how to promote academic integrity in recognition of potential student use of generative AI tools.

## Policy Principles

### Definitions

**Generative Artificial Intelligence (AI)** - Generative AI is a type of computer-based model that can generate new content or modify existing content in response to user prompts. The inputs and outputs of generative AI tools can include text, images, audio, computer code, and other types of data.

Generative AI tools and functions can be provided through standalone products or embedded into other software and applications. Common tools are ChatGPT and Microsoft Copilot. Some generative AI tools combine multiple functions into one product:

- Text Generation: specialising in producing human-like text (tools that do this are sometimes known as large language models (LLMs)).
- Image Generation: able to transform text into images or create images.
- Video Generation: able to create videos or edit existing videos.
- Audio Generation: able to create audio files, such as music, speech, or sound effects.
- Code Generation: can produce computer programming code, such as Python, Java, or C++.
- Design Generation: can produce layouts, visual compositions, and graphical elements for a wide range of design projects.

**Personal Information** - Personal information is recorded information or opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information. The information or opinion can be recorded in any form. A person's name, address, phone number and date of birth (age) are all examples of personal information.

**Algorithm** - means a series of specific directions or instructions built into computer software or systems to solve a defined problem or automate decision-making. Algorithms may use AI to produce improved outcomes.

**Algorithmic Bias** - means an error or prejudice built into an algorithm (intentionally or unintentionally) that creates outcomes that are unfair, erroneous or favour one group of people over another and may impact an individual's human rights.

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**AI System:** (also system) means any software system, technology or program the School that uses AI as part of its decision-making processes, in part or in whole. AI systems include capabilities, analytics and algorithms on new or existing IT resources.

**AI System Lifecycle** - means the time from inception through to review and renewal or destruction of an AI system.

**AI System Owner** - means appropriate staff identified as responsible for the technical implementation of the AI system and its review and monitoring as outlined in the approved project. Where there are multiple AI system owners, a primary owner (normally the most senior staff member) must be identified. AI system owners must have a working relationship with any relevant information system steward.

**Non-Operational AI System** - means AI systems that do not use a live environment for their source data, rather, provide analysis and insight from historical data. While, normally, non-operational AI represents a lower level of risk, the risk level needs to be carefully assessed, particularly where the outputs may be used to influence decision-making or action.

**Operational AI System** - means AI systems that either produce an act or decision, or prompt a human to act. Normally these systems work in real time using a live environment for their source data. These systems generally present more risks than non-operational AI systems as they tend to have a real-world effect. However, not all operational AI systems are high risk (for example, digital information boards or apps that show the time of arrival of the next bus).

## Artificial Intelligence Usage at the School

On 1 December 2023, Education Ministers released the Australian Framework for Generative Artificial Intelligence in Schools (the National Framework). The aim of the National Framework is to provide guidance on understanding, using and responding to generative AI. It includes 6 principles and 25 guiding statements that define what safe, ethical, and responsible use of generative AI should look like in Australian schools. This policy, guidance and resources are designed to complement the National Framework.

The School will comply with the requirements outlined in our policy when using generative AI in all contexts. The School may use generative AI tools if use complies with the requirements of this policy.

## Protecting Privacy and Personal Data

Generative artificial intelligence (AI) tools pose unique privacy and data protection risks that are important for the School to be aware of.

For example:

- Generative AI providers may request or require student data that includes personal, sensitive or health information to provide access to their generative AI tools.

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- Students or other members of the School community may upload personal, sensitive or health information belonging to themselves or others without being aware of the associated privacy and data protection risks.
- Some generative AI tools have the capacity to match data inputs with other information about individuals, which increases privacy risk through building individual data profiles.
- The safety and storage processes of data inputs into generative AI tools may be unclear.
- It may be difficult or impossible for a generative AI model to forget personal, sensitive or health information once it has been uploaded.
- Inputs copied from the internet or from untrustworthy sources, when pasted as a prompt into a generative AI tool, may cause the tool to behave in unexpected or unsafe ways (for example, an image copied from the internet and pasted into a multimodal generative AI tool, may have invisible text embedded within it that the user was not aware of). This is sometimes referred to as a 'prompt injection'.
- Content generated by generative AI about a person can constitute a new collection of personal information about that individual, which can be seen as unreasonably intrusive and therefore a breach of privacy.

School leaders can:

- Select tools that limit the unnecessary collection or processing of personal, sensitive and health information (either by default or by allowing schools to adjust the settings of the tool).
- Adjust the settings of generative AI tools used by students and staff to protect their privacy.
- Monitor the use of tools to ensure that personal information is not uploaded in tools that share this data with third parties, use this data to train a generative AI model, or save or store this data for future use by the provider of the tool.

Teachers can:

- Only collect or upload data necessary for the task at hand, de-identify data before uploading it, use strong encryption to protect data, and only give data access to authorised personnel.
- Direct students to avoid uploading personal, sensitive and health information to generative AI tools.
- Guide students to be careful when using prompts based on inputs copied and pasted from the internet or from untrustworthy sources.

The School is expected to take reasonable steps to ensure the protection of data entered into generative AI tools or software that integrates generative AI tools (including user prompts).

The School will do this by prioritising the use of tools that:

- Do not share this data with third parties.
- Do not use this data to train a generative AI model.
- Do not save or store this data for future use by the provider of the tool.
- When using any generative AI tool, the School will direct staff and students to not load any personal information about students or staff onto the tool (for example, student names, reports, personal histories and contact details).

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- Staff will also be directed not to enter any information about the school that could be sensitive (for example, student assessment data and student attendance records). This is because content may be used and reused by the platform and its users, which may constitute a privacy breach.

## Consent to use AI tools

As generative AI is a 'new and emerging technology' the School must obtain opt-in consent from parents and carers before using any generative AI tool that requires personal information beyond provision of a student's school email address and creation of a password for registration (for example, name or phone number). Staff and students also must not use the password from their school email when registering for a generative AI tool.

In addition, if personal information is not required for registration, the School will provide the opportunity for students to opt-out and will communicate with parents and carers about how the generative AI tool will be used. Opt-out consent recognises known risks of generative AI technologies (for example, the creation of biased or inaccurate content) as well as general risks associated with new technologies, which often rapidly evolve.

## Appropriate Use of Generative AI Tools by our students

The School will help prepare students to understand and use generative artificial intelligence (AI) tools, by supporting them to learn:

- What generative AI is, how it works, and its opportunities and risks.
- How to use generative AI tools in a safe and responsible way, while avoiding potential harms.
- How to critically analyse and evaluate the functioning and outputs of generative AI tools.

The School will closely supervise student use of digital technology in the classroom, including generative AI tools.

AI systems will be regularly monitored and evaluated for effectiveness, unintended impacts, and compliance. Findings will be documented and used to inform ongoing policy updates.

The School will seek guidance from LEVNT to provide knowledge and skills when configuring generative AI tool settings to protect the privacy of users and restrict harmful content. For example, parameters that may be adjusted include:

- Adjusting the possible prompts that can be inputted into the tool.
- Adjusting the possible length of any outputs of the tool.
- Reducing the default 'temperature value' of the tool, so that it provides less variable, more focused outputs.
- Adjusting privacy settings so that student inputs (prompts) are not disclosed to others or used to train the generative AI model.
- Setting up the tool with customised standing instructions that are relevant to local context and that will apply to all responses provided by the tool (schools are encouraged to include in these instructions a requirement for the tool to not breach copyright in its responses).

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Generative AI systems are typically operated by users entering a 'prompt' to guide the underlying model's output. Prompts can be text-based, and can also include voice, images and other inputs. A user's prompt may not initially produce the desired output from a generative AI tool, so in many cases prompt refinement is required. This is known as 'prompt engineering'. Staff and/or students will be supported to reflect on and create effective prompts.

A generative AI tool's outputs are based on the data it is trained on, which can lead it to reproduce inaccuracies or biases inherent in the training data. This cannot always be prevented using effective prompting, which makes it essential that generative AI outputs are critically analysed and evaluated.

Teachers will support students to critically analyse and evaluate generative AI outputs by teaching them to compare and verify outputs with reliable alternative sources of information. This can help to identify inconsistencies and biases in the generative AI output, while also providing an opportunity for reflection on why these inconsistencies and biases exist. It can also provide opportunities for students to learn about what makes a source of evidence reliable, and how they can evaluate different sources for their reliability.

Some of the inappropriate or harmful uses of generative AI tools include:

- Misrepresentation of information (for example, through the creation and dissemination of information that is wholly or partly inaccurate, that reduces a person or group's ability to accurately understand something, or that is intentionally or unintentionally designed to cause harm to others).
- Harassment, including cyberbullying (for example, through the creation and dissemination of 'deep fakes').
- Privacy violations (for example, by uploading personal, sensitive or health information about another person into a generative AI tool and/or using that information to generate new content about that person).
- Cultural appropriation (for example, by creating new artefacts influenced by or mimicking a cultural tradition in a way that is disrespectful or offensive).
- Discrimination (for example, using generative AI tools to produce and disseminate biased content that reinforces harmful stereotypes or unfairly excludes individuals, communities or groups).
- Entering information that may breach another person's intellectual property rights.

The School will establish processes to monitor how well these tools are implemented and how much they impact learning and wellbeing outcomes. This will assist in determining how to change the tools' parameters or change which tools are in use.

### Promoting Academic Integrity

Generative artificial intelligence (AI) tools can provide the opportunity for students to develop higher order critical thinking, analytical and evaluation skills, and can create efficiencies which allow students to focus more of their time on the skill being assessed. However, these tools can also make it easier for students to undermine forms of assessment that are in use today.

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Academic integrity refers to the expectation that students behave honestly and ethically in the completion and assessment of student work. Maintaining academic integrity ensures students are assessed fairly and teachers, students and parents/carers get an accurate understanding of student progress to help guide further teaching and learning.

The School will support a culture of academic integrity by providing students with clear expectations about values, responsibilities and behaviours related to learning and assessment, and by responding to breaches of academic integrity in a consistent and proportionate way.

School leaders and teachers are encouraged to identify and respond to academic misconduct using generative AI tools in a consistent manner in line with any policy.

The School will proactively identify and manage risks around academic integrity and generative AI. This may include:

- Setting expectations and building a culture of academic integrity.
- Designing assessments with consideration of generative AI tools.
- Identifying and responding to the inappropriate use of generative AI tools in assessments.
- Requesting generative AI tools used in preparing an assessment be identified along with prompts given to the AI tool.

## AI Compliance

Any planned use of an AI tool should implement the following key compliance controls:

- The AI tool complies with all existing School technology policy and procedure.
- This includes obtaining approval from the Principal and/or Business Manager and where assessed as a high risk, completing a software risk assessment prior to the implementation of the AI tool. A risk assessment for software should include assessment of child safety, privacy, accessibility and equity, information and access security, compliance and reputational type risks at minimum.
- The data and information collected by the tool is well understood and assessed to comply with the School privacy policy and define any AI tool data and information collection, expected benefits and risks.
- The use of the tool complies with any terms set out by the provider of the tool, which may include an age limit.
- Adequate preparation of staff and students to understand and use tools safely and responsibly.
- Prior to implementation of any generative AI tool, the School must ensure that the tool can be implemented in an accessible and inclusive way. This includes meeting obligations under the Equal Opportunity Act 2010 (Vic), the Disability Discrimination Act 1992 (Cth) and the Disability Standards for Education 2005 (Cth) to make reasonable adjustments to accommodate staff or students with disability.
- Obtain opt-in consent from parents and carers before using any generative AI tool that requires personal information beyond provision of a student's school email address and creation of a password for registration.

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- Protect student data and privacy by restricting the uploading of personally identifiable information into generative AI tools or software that integrates generative AI tools.
- Direct staff and students to not use generative AI tools to: upload or generate media depictions of students, staff or parents or to generate artefacts that mimic a cultural tradition in a way that is disrespectful or offensive.
- The School must also direct staff to not use generative AI tools to communicate with students and parents in ways that undermine authentic learning relationships or replace the unique voice and professional judgement of teachers and school leaders.

### Appropriate Use of Generative AI Tools

Where the use of generative AI tools exist at the School, staff and students will be directed to:

- Not upload media including depictions of students, staff or parents (for example, photos, audio, video), or generate images or other media in the likeness of these persons.
- Not generate artefacts that mimic a cultural tradition in a way that is disrespectful or offensive (for example, images mimicking Koorie artwork).

Staff will also be directed to not use generative AI tools to communicate with students and parents in ways that undermine authentic learning relationships or replace the unique voice and professional judgement of teachers and school leaders. This includes not using generative AI tools to directly:

- Communicate with parents or students.
- Make judgements about student learning achievement or progress.
- Write student reports for parents or carers.

During implementation of any generative AI tool, the School will:

- Ensure the use of generative AI tools is disclosed when tools have an impact on others. Disclosure can be given to teachers, staff, students, parents and carers.
- Ensure monitoring of benefits and risks.
- Consider de-implementing any tool if benefits are not realised or risks are not being adequately managed.

### Ethical Principles of the Use of AI

The School follows the following ethical principles for the use of AI, summarised as follows:

- **Community Benefit:** AI should deliver the best outcome for human users, in this case, the School community, and provide key insights into decision-making. AI must be the most appropriate solution for service delivery or a policy problem, considered against other analysis and policy tools.
- **Fairness:** Use of AI will include safeguards to manage data bias or data quality risks. The best use of AI will depend on data quality and relevant data as well as careful data management to ensure potential data biases are identified and appropriately managed.
- **Privacy and Security:** AI will include the highest levels of assurance. The School must have confidence that data is used safely and securely in a manner that is consistent with privacy, data sharing and information access requirements.

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- **Transparency:** Review mechanisms will ensure that the School can challenge and question AI-based outcomes and will have access to an efficient and transparent review mechanism if there are questions about the use of data or AI-informed outcomes.
- **Accountability:** While AI is recognised for analysing and looking for patterns in large quantities of data, undertaking high-volume routine process work, or making recommendations based on complex information, AI-based functions and decisions must always be subject to human review and intervention. AI system owners and business owners are responsible for the management of their AI systems.

The ethical principles for the use of AI are to be applied at each phase of the AI system lifecycle. The School also acknowledges the voluntary Australian Framework for Generative Artificial Intelligence (AI) in schools to further guide the use of AI by staff. These principles encourage and guide usage. The AI lifecycle and the AI framework link and principles are provided in Appendix 2.

The use of AI at the School must follow all applicable state and federal laws as they maybe developed to direct and guide AI usage.

### Leveraging the AI Opportunity

Embracing the potential of AI, the School seeks to leverage this technology across its operations. The rapid advancements in the field of AI have created numerous opportunities to engage with tools that can have a profound impact on productivity.

#### 1. Operational Efficiency, Competitiveness and Adaptability

The School supports a culture of continuous improvement with the usage of AI potentially enhancing operational efficiency across the organisation, in line with the School operational and strategic goals.

AI technology may be used for a wide variety of operations to enhance consistency, speed, and organisational agility. It can also be implemented to identify issues, risks, opportunities, and control improvements.

#### 2. Staff and Community Wellbeing and Support

The School encourages the use of AI technology to enhance staff and community wellbeing and support, with appropriate strategies for maintaining student, staff and community privacy and obtaining consent to engage in AI content (and the associated ability to opt out if requested).

#### 3. Appropriate Protections and Responsibilities

The School will ensure that appropriate protections are in place to maintain data integrity and privacy. Robust protection measures will be included in operational plans relating to data collection, retention and sharing, and the associated privacy considerations in line with legislation and regulatory requirements. Where necessary, consent will be sought for the use of AI in analysis of data.

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Information Technology Systems will be regularly updated and enhanced to ensure the suitability, reliability and protection of infrastructure for AI.

Staff are responsible for any content produced or published that includes AI-generated material.

#### 4. Development and Procurement of AI Tools

The School will play an important role in the advancement of AI technology, fostering innovation, and facilitating the exchange of knowledge and technology. The School supports both the development and procurement of AI tools to provide educational and/or commercial opportunities.

The School supports the purchase of AI technologies to enhance research capabilities, streamline administrative processes, and enrich educational experiences. The selection and purchase of AI tools require rigorous evaluation, considering factors like cost-effectiveness, scalability, ethical considerations, and compatibility with existing systems.

#### **Policy Awareness and Training**

Ongoing training and education are essential to ensuring that staff understand their roles and responsibilities and implement the Responsible Artificial Intelligence Use Policy.

Training is ongoing to assist our staff and students both with awareness of risks, policy and how to leverage the value of AI with responsible use. This is delivered by initiatives and opportunities from LEVNT to support schools in this area. For example, partnering with the Cyber Safety Project.

This policy is designed to be communicated through our School Microsoft Teams platform, as well as through other mediums with students and parents such as newsletters, staff meetings, welcome packs and website.

#### **Privacy and Information Sharing**

The School collects, uses, and discloses medical information about children and their families in accordance with the Victorian and National privacy laws, and other relevant laws. For information on how our School collects, uses and discloses information refer to the School's Privacy Policy.

### **Policy Compliance**

#### **Policy Breach**

As policy documents provide direction and protection for the staff, parents and students of St John's Lutheran Primary School Ltd, it is an important requirement that those that are high and medium risk contain a statement on the implications of a breach.

All breaches, near misses and risks related to this policy should be reported to the Principal.

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Compliance with this policy will be monitored by the Principal and Business Manager and this may include independent audits and reviews.

If you believe that the School has breached its obligations, please contact the Principal in writing or by telephone. The School will investigate your notification and will inform you of the outcome as soon as is practicable after a decision has been made.

Certain incidents might be covered by the School Whistleblower Policy available on our website.

The Principal is responsible for ensuring that all breaches of this Policy and underlying policies, guidelines and procedures are escalated to the School Board as soon as possible.

A breach of this Policy may lead to disciplinary action including possible termination of employment or appointment and/or referral to the appropriate authorities.

## Related Policies, Procedures and Legislation

### Policy and Procedure Linkage

- Information & Communication Technology (ICT) Policy
- Privacy Policy
- Whistleblower Policy
- Student Duty of Care Summary Policy
- Student Behaviour Management (Discipline) Policy and Procedures
- Cyber Safety Policy and Procedures

### Related Legislative Instruments (Victoria)

The Australian Framework for Generative Artificial Intelligence in Schools outlines six principles and 25 guiding statements to define safe, ethical, and responsible use of generative AI in Australian school.

Office of the Victorian Information Commissioner (OVIC) advises caution and emphasizes the need for human oversight in the use of AI tools in educational settings. For further information, the School may refer to the February 2024 public statement made by the Office of the Victorian Information Commissioner.

### Policy Control & Approval Information

Policy Category	Risk Rating	Approver	Date Approved	Next Review
Admin & Finance (including ICT)	High	Board	13/02/2026	2028

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## Appendix 1 – One page overview poster to guide staff

# GENERATIVE ARTIFICIAL INTELLIGENCE (AI)

## Protecting personal data on generative AI tools – One page overview



### 1. Comply with product's Terms of Use

When using generative AI tools, schools must comply with any terms set out by the provider of the tool. For students, this may include an age limit.



### 2. Seek parental consent

See the '[Collection notices](#)' tab of the Privacy and Information Sharing policy for templates that you can use for gaining parental consent.

**Key question:** Does registering to use the generative AI tool require personal information (beyond provision of a student's school email address and creation of a password)?

#### If YES:

Opt-in consent is required.

#### If NO:

Schools can seek opt-out consent and are encouraged to communicate with parents and carers how the generative AI tool will be used.



### 3. Restrict the input of personal information

Schools are expected to take reasonable steps to ensure the protection of data\* entered into generative AI tools or software that integrates generative AI tools (including user prompts), by prioritising the use of tools that:

- do not share this data with third parties
- do not use this data to train a generative AI model
- do not save or store this data for future use by the provider of the tool.

When using any generative AI tool, schools must:

- direct staff and students to not load any personal information about students and staff onto the platform (e.g. student names, reports, personal histories or contact details)
- direct staff to not enter any information about the school that could be sensitive (e.g. student assessment data and student attendance records)
- direct staff and students to not upload media depictions of students, staff or parents (e.g. photos, audio, video) or generate images or other media in the likeness of these persons.

\*Note - For further information, schools may refer to the February 2024 [public statement](#) made by the Office of the Victorian Information Commissioner.



### 4. Implement risk assessment actions

- When planning for, or using generative AI tools, schools must follow the requirements outlined in the [ICT Software in Schools – Risk Assessment policy](#), including the implementation of applicable actions in the tool's Safer Technologies 4 Schools (ST4S) risk assessment report.
- If a school wishes to use a product that has not been assessed by ST4S, they must raise an assessment request with the department's IT Security Team and are advised to complete a Privacy Impact Assessment (PIA).

For further advice or support in implementing generative AI tools in your school, please visit [www.education.vic.gov.au/pal/generative-ai/policy](http://www.education.vic.gov.au/pal/generative-ai/policy), or email [digital.learning@education.vic.gov.au](mailto:digital.learning@education.vic.gov.au).

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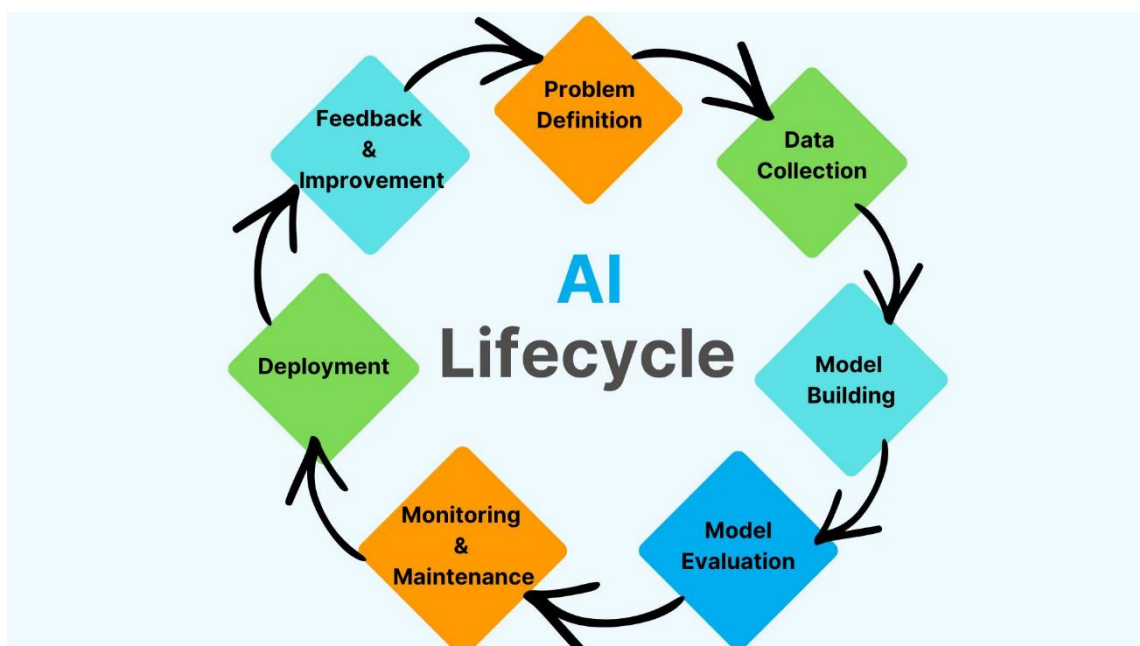


## Attachment 2 – Australian Framework for Generative AI in Schools and AI Lifecycle Stages

### AI Lifecycle

The AI Lifecycle describes the end-to-end journey of an AI system, from identifying a business or research problem through to deploying and maintaining a working model in the real world. It ensures AI systems are purpose-driven, trustworthy, safe and effective over time. The stages typically include:

- Problem Definition: Understand and frame what you want AI to solve.
- Data Collection & Preparation: Gather, clean and structure data.
- Model Building : Develop algorithms to learn from data.
- Model Evaluation: Test the model's performance and fairness.
- Deployment: Integrate the model into a production environment.
- Monitoring & Maintenance: Continuously assess the model's real-world behaviour.
- Feedback & Improvement: Update and retrain the model based on new data and outcomes.



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