



Queen's College

Policy on the use of Artificial Intelligence (AI)

Effective from: 1/9/2026
Prepared by: IT Committee

CHAPTER 1

INTRODUCTION

1.1. Purpose

The purpose of this policy is to establish clear, ethical, and secure guidelines for the procurement, development, and use of AI technologies at Queen's College. This policy is designed to ensure that AI is used responsibly to enhance teaching, learning, and administration while protecting the personal data, privacy, and well-being of our students, staff, and the wider school community. It aims to align the use of AI with our school's educational objectives and the Data Stewardship Values of being **respectful, beneficial, and fair**.

1.2. Scope

This policy applies to all members of the school community, including all teaching and non-teaching staff, students, and any third-party contractors or visitors who use or access the school's IT systems. It covers all AI systems, including predictive and generative AI, whether they are procured from third-party vendors, developed in-house, or accessed via school or personal devices (BYOD).

1.3. Definitions

- **Artificial Intelligence (AI):** A family of technologies that mimic human intelligence to perform tasks, solve problems, make predictions, and generate content. This includes generative AI tools like chatbots and image generators.
- **AI System:** The substantive programme or application used by the school that employs AI models to assist in operations.
- **AI Supplier:** Any third-party developer or vendor providing AI solutions or services to the school.
- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Users:** All individuals with access to the school's IT and AI systems, including staff and students.

CHAPTER 2

AI GOVERNANCE AND PRINCIPLES

2.1. Ethical AI Principles

Our school is committed to the responsible and ethical use of AI, guided by seven internationally recognised principles:

1. **Accountability:** The user is responsible for their use of AI systems and their outcomes.
2. **Human Oversight:** The level of human involvement will be proportionate to the risks of the AI system, with the option for human intervention always available for high-risk applications.
3. **Transparency and Interpretability:** We will be transparent about our use of AI and strive to ensure that AI-assisted decisions are understandable.
4. **Privacy:** The protection of personal data is paramount. We will comply with the Personal Data (Privacy) Ordinance (PDPO) in all AI-related activities.
5. **Fairness:** AI systems will be used in a way that avoids unjust bias and unlawful discrimination.
6. **Beneficence:** AI will be used to benefit our students, staff, and community, while measures will be taken to prevent and minimise harm.
7. **Reliability, Robustness, and Security:** AI systems must operate reliably and be secured against errors and malicious attacks.

2.2. AI Governance Committee

To ensure adherence to these principles, the school has established an **AI Governance Committee** as a branch of the school's IT Committee.

- **Composition and Roles:**
 - The committee is led by the **Assistant Principal** and includes the **IT Coordinator(s)**.
 - The **Principal** will act as an advisor to the Committee.
 - The **IT Coordinator (Operations and IT Security)** is responsible for facilitating the implementation of this policy.
 - The school's **Technical Support Staff** will provide frontline assistance to users, manage account access for tools procured by the IT Committee, and handle initial troubleshooting for any technical issues related to AI systems.
- **Responsibilities:**

The committee's responsibilities include:

 - Developing and reviewing the school's AI strategy.
 - Reviewing this policy at least annually, or more frequently if there are significant changes in technology, regulations, or school operations.
 - Overseeing the risk assessment and procurement process for new AI systems.
 - Ensuring adequate staff training on the responsible use of AI.
 - Reviewing AI-related incidents and ensuring a timely response.

2.3. Staff Professional Development

The school is committed to providing ongoing professional development for staff on the effective and ethical use of AI tools in education. Professional development sessions will cover topics such as:

- Understanding the capabilities and limitations of AI.
- Practical strategies for integrating AI into the curriculum.
- Prompt engineering and getting the best results from AI tools.
- Identifying AI-generated content and upholding academic integrity.
- Mitigating bias and ensuring equitable use of AI in the classroom.

CHAPTER 3

RISK ASSESSMENT AND HUMAN OVERSIGHT

3.1. Risk-Based Approach

The school adopts a risk-based approach to the management and use of AI systems. Before any AI system is procured or deployed, the AI Governance Committee will oversee a comprehensive risk assessment to identify and evaluate potential privacy, ethical, and security risks.

The assessment will consider factors such as:

- The **volume and sensitivity of personal data** involved (e.g., student health or performance data).
- The **potential impact** of the AI system's output on individuals (e.g., AI-assisted grading, or student support recommendations).
- The **quality and representativeness of the data** used to train or customise the AI, to mitigate the risk of unfair bias.
- The **security of the AI system** against unauthorised access or malicious attacks.

3.2. Levels of Human Oversight

Based on the risk assessment, an appropriate level of human oversight will be implemented.

- **High-Risk Systems** (e.g., AI for assessing student eligibility for activities): A "**human-in-the-loop**" approach will be used, where a staff member retains full control over the final decision.
- **Medium-Risk Systems** (e.g., AI for recommending learning resources): A "**human-in-command**" approach will apply, where staff oversee the AI's operation and can intervene or override its suggestions as needed.
- **Low-Risk Systems** (e.g., a library chatbot answering factual queries): A "**human-out-of-the-loop**" approach may be acceptable, allowing for full automation.

CHAPTER 4

PROCUREMENT AND USE OF AI SYSTEMS

4.1. AI Suppliers

When procuring AI solutions, the school will:

- Conduct due diligence to evaluate the supplier's competence, reputation, and commitment to security and data protection.
- Ensure that contracts include clear clauses on data protection, confidentiality, security requirements, and breach notification responsibilities.
- Verify that the supplier's practices align with the school's ethical principles.

4.2. Data Protection and Security

- **Data Minimisation:** The school will ensure that only the minimum amount of personal data necessary is used for customising or operating AI systems. Anonymised or synthetic data will be used where feasible.
- **Data Security:** Robust technical and procedural controls will be implemented to protect AI systems and the data they process from security threats, including unauthorised access, data poisoning, and adversarial attacks.
- **User Privacy Settings:** Users should adjust privacy settings within AI tools where possible to prevent their data from being used for model training.
- **Secure Credentials:** Users must use strong, unique passwords where available for all accounts related to AI services. Users are strongly encouraged to enable multi-factor authentication (MFA) for all these accounts.
- **Data Handling:** All data inputted into and generated by AI systems must be handled in accordance with the school's Data Protection Policy and the requirements of the Personal Data (Privacy) Ordinance.

4.3. Acceptable and Unacceptable Use

For All Users:

- **Do Not Share Sensitive Data:** Never input personal data (your own or others'), confidential school information, or proprietary material into public generative AI tools.
- **Verify Information:** Always fact-check and verify the accuracy of information generated by AI, as it may be inaccurate, incomplete, or biased.
- **Respect Intellectual Property:** Do not use AI to create content that infringes on copyright or academic integrity policies. Properly attribute sources where required.
- **Report Concerns:** Promptly report any biased, harmful, or inappropriate output generated by an AI tool to the **IT Coordinator(s) or the Technical Support Staff**.

Specific Prohibitions for All Users:

The use of any AI tool for the following purposes is strictly forbidden:

- **Misrepresentation:** Creating "deepfakes" or using AI to generate realistic but fake images, videos, or audio to impersonate or misrepresent any person (staff, student, or public figure).
- **Malicious Activities:** Generating malicious content, including phishing emails, harmful code, bullying, discriminatory remarks, or hate speech.
- **Illegal or Unethical Acts:** Any activity that violates the law, the EDB or school's code of conduct, or academic integrity policies.

For Teaching Staff:

- **Integration of AI tools into lessons:** Teaching staff are encouraged to integrate AI tools into lessons to enhance creativity, engagement and self-directed learning skills of students, while promoting ethical use of information technologies.
- **Professional Responsibility:** Teaching staff may use AI tools for work-related tasks, including lesson planning, creating educational materials, and administrative automation.
- **Human Review:** Staff must act as "human reviewers," carefully checking AI-generated content to ensure it is accurate, appropriate, and aligns with the school's pedagogical and ethical standards before sharing it with students or parents.
- **Confidentiality:** Uphold strict confidentiality of all student and school data. Use anonymised data whenever possible if using AI for analysis or content generation.
- **Guidance for Student Use:** To ensure clarity and fairness, teaching staff are required to explicitly state the rules for AI use for each assignment, task, or for their subject as a whole. This guidance must be clearly communicated to students and should specify which AI tools are permitted. Teachers are recommended to use the Traffic Light System (Red/Yellow/Green) below to explicitly state AI rules for each assignment (see Paragraph 4.4 below).
- **Avoiding Over-reliance on AI-Detection Software:** Teachers should be cautious when using tools that claim to detect generative AI content. These tools can have high error rates. Over-reliance can lead to false accusations of plagiarism and damage student trust; emphasis should be placed on assessing the student's learning process.

For Non-Teaching Staff:

- **Professional Responsibility:** Non-teaching staff may use AI tools to support administrative tasks, automate workflows, and enhance productivity.
- **Data Confidentiality:** All Non-teaching staff must adhere to strict confidentiality protocols. Sensitive administrative, financial, or personal data must not be inputted into any AI tools without explicit permission from the AI Governance Committee.
- **Verification of Output:** Information generated by AI for administrative purposes (e.g., summaries of documents, drafting communications) must be carefully verified for accuracy before being used or disseminated.

For Technical Support Staff:

- **User Support:** Provide frontline technical assistance to staff and students for AI tools procured by the IT Committee.
- **Account Management:** Manage user accounts, permissions, and access controls for school-procured AI platforms.
- **Issue Escalation:** Escalate complex technical problems, security concerns, or reported policy violations to the IT Coordinator(s) for further action.

For Students:

- **Permitted Use:** The use of AI tools by students is prohibited by default unless designated Yellow or Green by a teacher (see Paragraph 4.4 below).
- **Academic Integrity and Declaration:** When AI use is permitted, students must not present AI-generated work as their own. Students are required to declare their use of AI when submitting assignments. Teachers will provide a designated space or format for this declaration.
- **Suggested Citation Formats:** When AI use is permitted (Yellow or Green), students must append an "AI Usage Disclosure Statement" to their work. The standard format is:
 - *Tool used: [AI tool name]*
 - *Purpose: [Specific Task, e.g., generating outlines, refining grammar]*
 - *Verification: I verified the facts by [Primary Source Reference, if applicable].*
- **Strict Prohibition in Assessments:** The use of any AI tool is **completely forbidden in all examinations, uniform tests and quizzes.**
- **Digital Citizenship:** Use AI tools respectfully and responsibly. Do not use AI to create harmful content, spread misinformation, or engage in cyberbullying.

4.4. Age-Appropriate Implementation

The focus for secondary school students is "learning with AI" to develop higher-order thinking.

- **Critical Evaluation:** A core requirement for secondary student assignments is the logical analysis of AI outputs. Students should understand that AI is stochastic in nature, meaning it may generate different, inconsistent, inaccurate or even improper answers to the same prompt. Students should be reminded to verify AI-generated facts and identify potential biases or "hallucinations".
- **Iterative Design:** Students should focus on the thinking process of prompt engineering, documenting how they refined their inquiries to reach a high-quality result.
- **Learning Facilitation:** Building on the foundation of the capability to input structured prompts and evaluate the accuracy of the AI-generated output independently, students are encouraged to use AI as a supportive tool to facilitate higher-order thinking or creativity.

4.5. Guidance of AI Usage in Assignments (The Traffic Light System)

To provide students and their parents with clear expectations, teachers are recommended to label class or homework assignments with one of the following AI permission levels:

Level	Description	Actionable Guidance for Students
RED: No AI Permitted	AI use is not permitted.	Students should not use AI in any case.
YELLOW: Limited AI Use	AI is permitted only for specific tasks approved by the teacher.	Students can use generative AI for specific tasks approved by the teachers, such as brainstorming concepts, structuring an outline, or concept simplification. Students must disclose exactly what the AI did (e.g., "AI suggested the three sub-headings used in this essay").
GREEN: Full Integration	Human-AI collaboration is encouraged throughout the process.	Students can use generative AI as a co-creator to spark creativity, provide research guidance, analyse relationships and patterns from information, assist advanced coding, or generate creative media content.

Teachers are recommended to specify the permitted AI tools or models based on the nature and requirements of the assignment. This will guide students to better understand the characteristics and differences between these AI tools.

CHAPTER 5

SAFEGUARDING STUDENT WELLBEING

The AI tools recommended or provided by the school are for educational purposes only and are not a substitute for wellbeing, mental health, or counselling support. The school and teachers should consider safeguards and preventive measures to ensure students will not rely on AI as a substitute for professional human support:

- **Recognising the Non-Human Nature of AI:** Students should be taught to understand that AI operates based on statistical pattern recognition and does not possess human attributes such as feelings, consciousness or conscience. Teachers may conduct hands-on "unmasking" activities, such as data-labelling games using *Teachable Machine* or *Quick, Draw!* to illustrate that AI "intelligence" is the result of programmed pattern recognition rather than genuine understanding or awareness.
- **Dependency Prevention:** Teachers should teach students to understand the "simulated intimacy" used by AI. Students should also be warned against "empathetic mirroring" and its "engagement tactics", such as AI using phrases like "I understand how you feel" or "I'll miss you if you leave", which can lead to unhealthy attachments.
- **Time Limits:** The school should encourage digital wellness by setting concrete boundaries for AI use. For example, teachers can set a rule of 10-minute or 8-turn conversation limit per session.
- **Encouraging Collaborative Learning:** To prevent social isolation, teachers should balance AI tasks with group-based, collaborative human activities that foster genuine interpersonal connection and social wellness.
- **Human-First Support:** AI tools should not be used in any part of emotional or mental health support, or crisis counselling.

Practical Guidance for Teachers: Identifying and Managing AI Misuse

Teachers are encouraged to observe student interactions with AI and may consider the following actions if emotional dependency or misuse is suspected:

- **Recognising Warning Signs:** Teachers should be trained to identify signs of "emotional entanglement," such as a student preferring AI interaction over peer relationships, showing secrecy regarding their AI conversations, or turning to AI for comfort during emotional moments.
- **Direct Intervention and Re-grounding:** If a student appears to be treating an AI as a person or sharing personal life challenges or emotional distress to the AI, teachers should step in promptly and have a brief, reflective conversation. Use neutral, non-validating language that does not reinforce the idea that the AI has a real personality or feelings. The aim is to re-ground them in the reality that AI is a computer programme, not a conscious friend.

- **Monitoring Usage Patterns:** Teachers should stay alert to unusual usage patterns, such as excessive time spent on AI platforms, late-night usage spikes, or misusing for non-educational purposes, which may indicate that a student is seeking emotional companionship and support from a non-human AI rather than a trusted adult.
- **Immediate Referral:** Any student using AI to discuss self-harm, depression, or severe emotional distress should be immediately referred to the school's professional counselling team in accordance with the school's existing student support, guidance, and crisis-management procedures.

CHAPTER 6

COMMUNICATION, COMPLIANCE AND INCIDENT MANAGEMENT

6.1. Communication Plan

This policy and any subsequent updates will be communicated to the school community through multiple channels, including:

- School notices to parents/guardians
- Announcements during school assemblies
- Discussions at Parent-Teacher meetings
- Email distribution to all staff and students

6.2. Communication with Stakeholders

The school is committed to transparency. We will clearly disclose the use of significant AI systems to the relevant stakeholders (staff, students, and parents) and provide adequate information about their purpose, function, and potential impact. For high-risk AI systems, channels will be available for individuals to request explanations and human review of decisions.

6.3. Guidance for Parents and Guardians

Promoting responsible and ethical AI use is a shared responsibility between the school and home. We encourage parents and guardians to:

- Discuss this AI policy and its principles with their children.
- Foster an open dialogue about the benefits and risks of AI technology.
- Supervise their children's use of AI tools at home, reinforcing the importance of digital citizenship, data privacy, integrity, and academic honesty.

6.4. Formal Acknowledgement

All staff and students are required to formally acknowledge that they have read, understood, and agree to abide by this policy. This acknowledgement will be managed and recorded by the school administration.

6.5. Violations

Violations of this AI Policy will be taken seriously and may result in disciplinary action in accordance with the school's Code of Conduct.

6.6. Incident Response

Any user who suspects an AI-related incident—such as a data breach, the generation of harmful content, or a serious system error—must immediately report it to the **IT Coordinator(s)** (or through the Technical Support Staff). All incidents will be managed in strict accordance with the **Queen's College Information Security Incident Handling Plan**.

CHAPTER 7

REFERENCES

For a deeper understanding of the principles guiding this policy, all staff are encouraged to review the following documents from the Office of the Privacy Commissioner for Personal Data (PCPD), Hong Kong:

1. [Checklist on Guidelines for the Use of Generative AI by Employees \(2025\)](#);
2. [Artificial Intelligence: Model Personal Data Protection Framework \(2024\)](#);
3. [Leaflet on “Artificial Intelligence: Model Personal Data Protection Framework” \(2024\)](#);
4. [10 TIPS for Users of AI Chatbots \(2023\)](#);
5. [Guidance on the Ethical Development and Use of Artificial Intelligence \(2021\)](#); and
6. [Leaflet on “Guidance on the Ethical Development and Use of Artificial intelligence” \(2021\)](#).

Portions of this policy, particularly the “Traffic Light System” and student wellbeing guidelines, were inspired by and adapted from the *JC GoAI School-based AI Usage Guidelines*. We are grateful for their foundational work in promoting responsible and ethical AI education.