COGNITA

AI Policy

Group Policy

January 2025

KEY FACTS:

Purpose

Welcome to the Cognita Policy on the use of Artificial Intelligence ("AI"). This Policy sets out Cognita's governance regarding the use of AI both at work and in its schools and summarises what Cognita considers to be acceptable use of AI tools by its employees, as well as prohibited uses of AI across the Cognita Group.

Scope

This Policy applies to all Cognita Group companies and schools worldwide ("Cognita" or "Group") and to all employees, whether permanent or temporary, including teachers, staff, administrators and third parties who develop, implement or interact with AI tools at Cognita. It covers all AI tools used for educational, administrative, and operational purposes, including but not limited to generative AI models ("GenAI"), intelligent tutoring systems, conversational agents, automation software, and analytics tools. This policy complements our existing policies on technology use, privacy, academic integrity and student support.

Introduction

1.1. AI can take many forms and there is no universally agreed definition. It most commonly refers to computer systems that are taught to automate tasks that normally require human intelligence, including solving problems and learning.

1.2. Generative AI, or 'GenAI' is a subset of AI technology and refers to tools that can produce new content such as text, images or music based on patterns they have learned from their training data. Examples of GenAI tools include; ChatGPT; Gemini (formerly known as 'Bard'); and Copilot. Many of these tools have been developed by training sophisticated computer systems on vast amounts of data. The GenAI system is programmed to sift through the large data sets looking for common patterns and correlations. The system can then use the patterns it has identified in the data sets to create new content depending on the questions it is asked, or requests that are made of it by an end user.

2. Key principles

2.1. When integrating the use of AI into its schools and its business, Cognita has established five principles that should guide our work. In implementing this policy these principles should be used to guide decision making and the use of AI:

i. Understand that AI **complements and assists** thinking and learning rather than replaces it.

ii. Consider the **ethical implications** of using AI, with a clear sense of doing good for others.

iii. Think **critically**, to **analyse** and use AI generated content with **creativity** to enhance work and learning.

iv. Take **ownership** of their work and learning products, this includes **honesty** and **integrity**, and for our students, **academic honesty** – especially for formally assessed pieces.

v. Recognise that inputting data into AI platforms may contribute to their **digital footprint** and understand the opportunities and dangers this can lead to, including those related to privacy and wellbeing.

3. Acceptable uses of AI by employees (excluding GenAI)

3.1. We will evaluate AI tools for compliance with all relevant policies and regulations. AI tools will need to detail if/how personal data is used to ensure that personal data remains confidential and is not misused. Employees may use AI tools which have been reviewed and approved for use through their Regional Data Privacy Impact Assessment Process (or applicable Regional process), subject to compliance with this policy and associated guidance and Cognita's Group Software Policy, Data Protection Policies and Acceptable Use Policy.

3.2. You may come across interesting external products or services which incorporate AI technologies in ways that you think could help your school and/or the business. Cognita has in place established supplier and contracting procedures and a Group Software Policy. If you think you have identified a product or service that Cognita should be made aware of, please refer to the Group Software Policy for further guidance.

4. Acceptable uses of GenAI by employees

4.1. Employees may use tools incorporating GenAI in the following contexts and subject to compliance with this Policy (in particular paragraphs 3.1 and paragraph 7 of this Policy) and associated guidance and Cognita's Group Software Policy, Data Protection Policies and IT Acceptable Use Policy. This list is indicative only and other uses may be permitted subject to compliance with applicable policies:

4.1.1. Drafting routine business emails, letters and responses;
4.1.2. Managing diaries and making appointments;
4.1.3. Creating content for school newsletters;
4.1.4. Providing technical support for IT issues;
4.1.5. Research assistance;
4.1.6. Analysis of data for insights;
4.1.7. Events planning and organization;
4.1.8. Translation of emails, documents and other communications;
4.1.9. Creating training materials;
4.1.10. Developing marketing materials and campaigns;
4.1.11. Summarising meetings and actions; and
4.1.12. Other similar activities

in all cases, provided personal or sensitive business data is not shared with third parties and does not leave the Cognita tenant. For further guidance on whether a GenAI tool allows personal or sensitive business data to be shared with third parties, please contact your Regional IT team.

5. Acceptable uses of GenAI by employees in a teaching context

5.1. In addition to the acceptable uses of AI and Gen AI by employees set out in paragraphs 3, and 4, teachers within Cognita schools may use GenAI in three different contexts, subject to compliance with this policy and associated guidance and Cognita's Data Protection Policies and Acceptable Use Policy:

5.1.1. Teacher initiated use for preparation of lessons, planning and similar activities.

5.1.2. Teacher instructed use of GenAI in classrooms as an accompaniment to the student learning experience (including teacher instructed use of approved GenAI tutoring tools).

5.1.3. Teacher initiated use for providing feedback on student work (excluding summative exams, assessment and coursework).

6. Student age usage restrictions on GenAI tools

6.1. Cognita recognises that the responsible use of GenAI will vary depending on the context. Students will take their cue from teachers, who will clarify if, when and how GenAI tools will be used in connection with their school activities. While the school system will help ensure compliance with applicable laws and regulations regarding data security, privacy and confidentiality, it will require everyone at Cognita to understand the risks that AI tools present and to adhere to this policy to keep our students, staff and organisation safe.

6.2. Within Cognita schools, the following parameters must be followed for teacher instructed use of GenAI in classrooms as an accompaniment to the learning experience:

6.2.1. Students under the age of 13 should not use GenAI tools either in school or in completing any school directed activity

6.2.2. Students aged 13 and above may use GenAI tools where the law and regulation permit, and where this is accompanied by appropriate parent/guardian consent.

6.3. It is the responsibility of individual schools to ensure that they have policies and processes in place to meet the requirements of this policy and associated guidance.

6.4. It is the responsibility of the individual school to ensure that they have obtained appropriate parent/guardian consent for every student age-13 and above prior to the student being allowed to use GenAI tools as part of the learning experience. Regional legal teams will be able to provide template parent/guardian consent wording and support with the process of obtaining lawful consent. Schools may decide not to use GenAI tools with students aged 13 and above if obtaining parental consent is considered too challenging in the school context.

6.5. These age requirements are stipulated in the terms of use for most commonly used GenAI tools. The requirement for parent/guardian consent is a requirement of the data protection laws in most of the countries in which we operate. Not following this student age use guidance is therefore likely to be a breach of GenAI terms of use and a breach of law.

6.6. There is no age restriction for a teacher demonstrating GenAI tools to students in the classroom (subject to compliance with this policy and associated guidance), provided that students are not themselves using GenAI tools.

7. Prohibited employee uses of AI

Below are the prohibited employee uses of AI tools at Cognita unless prior approval is received from both the Group IT Director and the Group General Counsel. This is not an exhaustive

list and should be viewed within the context of related policies and guidance including Cognita's Group Software Policy, Data Protection Policies and IT Acceptable Use Policy.

7.1. Use without human input: AI should never be relied upon to perform any action entirely independently of human initiation, influence and oversight. This includes assigning homework to be completed by students outside of the school environment using GenAI tools, unless such tools have been specifically approved in accordance with this paragraph 7.

7.2. Abuse of privacy: Content provided as input to some AI tools, and in particular GenAI systems, will form part of the material on which that AI tool can draw to provide future answers, even to unrelated third parties. Employees must not provide sensitive business information or the personal data of any other person - especially students - as input to a GenAI tool where the input data may be used as part of system learning or by third parties. Employees must not use personal data (including sensitive personal data) in any way contrary to Cognita's Data Protection Policies, the employee privacy notice, or the privacy notices of their school (if applicable). The Regional Data Privacy Impact Assessment team and Regional IT teams can be contacted for further guidance.

7.3. Breaking third party rules: AI tools might have their own rules about using their system. Those rules might relate to the minimum age of users or the creation of certain content and will most likely form part of a product's terms and conditions. If a Cognita employee is using a tool in connection with their employment, they should not use an AI tool in a way that is contrary to any third-party rules that govern the use of that service.

7.4. School governance processes: Using AI tools for final decision-making in student admissions or terminations. However, AI tools can be used to assist and provide insights during the admissions process, provided that final decisions are made by authorized personnel and comply with all relevant data privacy and governance standards

7.5. Administration of internal complaint procedures: use of AI tools in student, parent or employee grievance, disciplinary or complaint processes

7.6. Biometric assessment: Using AI tools for real time and post remote biometric identification of students, teachers or other employees of Cognita;

7.7. Employment and HR: Using AI tools for CV filtering, application assessments, termination of contracts of service; and

7.8. Emotional recognition: Using AI tools used to assess the emotional state of a person.

8. Prohibited employee uses of AI in a teaching context

In addition to the prohibited employee uses of AI tools listed in paragraph 7, below are the prohibited employee uses of AI tools in a teaching context.

8.1. Overreliance: Cognita employs staff who are gifted educators with unique and valuable skills and knowledge. Employees must not use AI tools in any way which would diminish the quality of the education that we provide, otherwise dilute or diminish the value of our employees, or result in reputational damage to the Group.

8.2. Use for summative exams: Employees must not use AI tools to assess student work in connection with any summative exam, assessment or coursework due to the potential for error. This includes the use of AI tools to generate content for use as teacher feedback and comments on summative exams, assessment or coursework, whether intended to be read by the student, their parent(s) or guardian or otherwise. Note that AI tools can be used to complement teacher feedback on non-summative student work, but should not be used in isolation or as the sole means of evaluating and providing feedback.

8.3. Plagiarism detection: Employees must not place reliance on AI tools that purport to analyse pieces of student work with the aim of detecting plagiarism or cheating. Such tools have not yet been proven to be accurate or reliable. However, such tools may be used in conjunction with other qualitative information provided that final decisions are made by authorized personnel and comply with all relevant data privacy and governance standards.

9. Prohibited student uses of AI

Below are the prohibited student uses of AI tools at Cognita. This is not an exhaustive list and should be viewed within the context of related policies and guidance including the IT Acceptable Use & Digital Safety Policy and Behaviour Policy.

9.1. Bullying: The use of AI tools to manipulate media to impersonate others for the purpose of bullying, harassment, blackmail or any form of intimidation is strictly prohibited. Students are expected to uphold the values of respect or their peers and inclusivity at all times.

9.2. Cheating and plagiarism: Students must not submit any work generated, or partly generated by AI for any assessment purpose, unless they have been explicitly instructed to do so by a teacher. Students should not copy material from any source, including from content generated by AI tools, without prior permission and appropriate documentation. Students should properly cite or acknowledge the use of AI where appropriate. This is particularly important in the context of any formal external assessments to which students are subject.

9.3. Use without human input: Unless a teacher has agreed to a particular use with reference to this guidance, AI should never be relied upon to perform any action entirely independently of a human being. While at school, or in connection with any school work, students must not use AI tools in a way that is free of human input.

9.4. Breaking third party rules: AI systems might have their own rules about using that system. Those rules might relate to the minimum age of users or the creation of certain content and will most likely form part of a product's terms and conditions. While at

school, students must not use any AI tool in a way that is contrary to any third-party rules that govern the use of that tool.

9.5. Abusing privacy: Content provided as input to some AI tools, and in particular GenAI tools, will form part of the material on which that AI model can draw to provide future answers. While at school, students must not provide their personal data, or the personal data of any other person as input to an AI tool. Personal data is any information that relates to an identified or identifiable living individual.

10. Data Protection

10.1. Cognita takes its data protection responsibilities seriously. We have in place strong systems and procedures that safeguard the personal data that we process as an organisation. Our data protection obligations affect how we deal with technology companies with whom we have relationships. Any interactions or relationships we have or may develop with technology companies that involve the use of AI must be subject to Cognita's Data Protection Policies.

10.2. Cognita is committed to being transparent when it comes to data protection especially with our students, their parents / guardians, and our employees, about the personal data we collect and how and why that personal data is processed. The emergence of increasingly sophisticated AI tools does not change our commitment to transparency.

11. Data Protection and GenAI Tools

11.1. Student Personal Data. We never allow any third party to process the personal data of our students unless we either have consent (if the student is old enough) or we have a legitimate interest or other valid legal basis to do so which has been authorised by our Regional legal and compliance teams. The emergence of GenAI tools does not affect this. As a general rule, staff must not provide, or permit to be provided, the personal data of any student as 'input' to a GenAI tool where the input data may be used as part of system learning or by third parties. This is because there are specific data protection regulations that prohibit us from doing so.

11.2. Employee Personal Data. We take the data processing obligations we have in respect of our employees just as seriously. As part of the general work of employees at Cognita or in the course of teaching students about AI, employees may wish to create an account with a GenAI service provider (e.g. ChatGPT, Copilot, or Gemini). If you do wish to use a GenAI tool in the course of your work at Cognita, you may use your Cognita email address to create an account. We expect all staff to keep their passwords safe and be just as mindful of their IT security responsibilities as they would be with any other external service provider.

11.3. Employees should remain alert to the personal data that GenAI service providers are likely to process when someone uses a GenAI tool. Often the content provided as input to an external GenAI tool will be used by that system as training

data. This means that information you provide as input may appear in content provided by the same GenAI tool to an unrelated third party at a later point.

11.4. In addition to student personal data, all employees are prohibited from providing any confidential information to a GenAI service provider, particularly information that is likely to be commercially sensitive.

12. Monitoring and enforcement

12.1. If Cognita determines that individuals acted inconsistently with this Policy, the law, or any other Cognita policy, standard, or guideline, the company may take actions up to and including termination.

Last amended – 20 December 2024

Ownership and consultation	
Document sponsor (role)	Group General Counsel
Document author (role)	Group General Counsel
Specialist Legal Advice	Cripps LLP
Consultation	Group Chief Education Officer Group Chief Financial Officer Group IT Director Head of Digital Learning Regional Chief Executive Officers Regional Heads of Legal HR Director, Europe and North America Marketing & Admissions Director, Middle East
Document review and maintenance (role)	Group General Counsel

Compliance	
Compliance with	Local legislation

Audience	
Audience	Group Policy

Document application	
Group Wide	Yes

Version control	
Implementation date	06/01/2025
1st Review date	
2nd Review date	

Related documentation	
Related documentation	