



Turin Vittoria High Schools

Internal Policy on the Use of Artificial Intelligence

Regulations

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Internal document governing the use of Artificial Intelligence tools in the teaching, educational, organisational and administrative activities of the School.

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1. INTRODUCTION

The School recognises that Artificial Intelligence (AI) tools are widely accessible to students, families, teachers and staff. For this reason, the School's approach is based not on a blanket ban, but on the definition of clear, understandable and enforceable rules, aimed at promoting use that is transparent and consistent with the School's educational mission.

Artificial Intelligence can be a useful tool to support learning, instructional design, inclusion, the personalisation of learning pathways, the preparation of materials, language revision, work organisation and digital literacy. However, its use cannot replace critical thinking and personal responsibility.

This *policy* governs the use of Artificial Intelligence tools within the School's teaching, educational, organisational and administrative activities and must be applied in accordance with current Italian and European legislation, including Regulation (EU) 2016/679 (GDPR), Legislative Decree 196/2003 as amended (Privacy Code), Regulation (EU) 2024/1689 (AI Act) – with particular regard to Art. 4 on AI literacy, Art. 5 on prohibited practices, and Art. 6 and Annex III on high-risk systems, including those used in the education sector – Regulation (EU) 2022/2065 (Digital Services Act), the guidance of the Italian Data Protection Authority (Garante per la protezione dei dati personali), and the Guidelines for the introduction of Artificial Intelligence in schools issued by the Italian Ministry of Education and Merit.

2. PURPOSE

This *policy* aims to:

- promote a use of AI consistent with the School's educational values;
- promote AI literacy and digital awareness;
- protect the personal data of students, families, teachers, school staff and third parties;
- establish operational rules for the use of AI by students and school staff;
- define roles, responsibilities and limits of use;
- prevent uncritical reliance on output generated by AI systems;
- distinguish between permitted use, improper use and prohibited use;
- regulate possible consequences, repercussions and measures in the event of improper or prohibited use.

3. SCOPE

This *policy* applies to:

- school management;
- academic coordinators;
- teachers;
- administrative staff;
- students;
- consultants and suppliers;

The *policy* applies both to AI tools provided or authorised by the School and to external tools, whether free or paid, whenever they are used for teaching, school-related, organisational or administrative purposes, or for purposes otherwise connected with the life of the School.

4. DEFINITIONS

For the purposes of this *policy*, the following definitions apply:

- Hallucination: output of an AI system presented as accurate but in fact incorrect, fabricated or unverifiable;
- Bias: systematic distortion in the responses of an AI system due to training data, model architecture or context of use, with potentially discriminatory effects;
- Deepfake: synthetic content (image, audio, video, text) generated or manipulated by AI so as to appear authentic;
- High-risk AI system: a system falling within the categories referred to in Art. 6 and Annex III of the AI Act, including certain systems used in education and vocational training;
- Generative AI: a system capable of producing new content (text, images, audio, video, code) from a prompt.
- Prompt: a textual or multimodal instruction given to AI to obtain a specific output.
- General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 on the protection of personal data)
- AI Act: Regulation (EU) 2024/1689 on artificial intelligence
- Digital Services Act (DSA): Regulation (EU) 2022/2065 on digital services
- Data Protection Officer (DPO)
- Data Processing Agreement (DPA)
- National Digital School Plan (PNSD)

Artificial Intelligence tools include, by way of example and without limitation:

- chatbots and conversational assistants;
- generative AI systems;
- tools for generating, completing, translating, summarising, correcting or reworking texts;
- document analysis tools;
- tools for generating images, audio, video, slides or presentations;
- tools supporting programming or code writing;
- tools for creating quizzes, tests, rubrics, exercises or teaching materials;
- tools supporting assessment, classification, scoring, profiling or monitoring;
- AI tools integrated into educational platforms, digital suites, electronic registers, learning environments or applications used by the School.

The *policy* also applies to digital tools that integrate AI features which may not be immediately apparent to the user.

5. GENERAL PRINCIPLES

5.1 Centrality of the person

AI must be used as a tool to support educational and organisational activities, never as a substitute for the person.

The teacher retains a central role in instructional design, explanation, guidance, assessment and the provision of feedback.

The student retains a central role in the learning process. AI can help students understand, organise, rework and improve, but it cannot replace study, practice, reasoning, personal responsibility and the ability to explain what they submit.

5.2 Human Responsibility

All content produced, modified, summarised, translated or suggested through AI must be checked by a person who is competent in relation to the context of use.

Teachers remain responsible for the materials they give to students, even when these have been generated or reworked with the help of AI. Students remain responsible for the assignments, written work, answers, projects and materials they submit, even when they have used AI as support.

5.3 Transparency and academic integrity

Students must always declare their use of AI whenever content generated or modified with AI is included, even partially, in the work they produce or submit.

The only use of AI exempt from the declaration requirement is use for personal study and better understanding.

5.4 Personal data protection

The processing of personal data through AI tools must comply with the principles of lawfulness, fairness, transparency, data minimisation, purpose limitation, accuracy, storage limitation, integrity, confidentiality and accountability. Where it is necessary to use real content for teaching or organisational purposes, anonymous, synthetic or adequately anonymised data must be used wherever possible. It is therefore strictly forbidden to enter personal data or information relating to students, families, teachers, school staff or third parties into AI tools that have not been authorised.

In particular, the following must not be entered into unauthorised AI tools:

- first names and surnames;
- photographs, videos or audio files of adults or minors without their consent or, for minors, without the consent of those holding parental responsibility;
- personal email addresses;
- images, audio or video;
- grades;
- evaluations;
- disciplinary notes;
- work attributable to identifiable students;

- certifications;
- Personalised Learning Plan (PDP)
- Individualised Education Plan (PEI)
- Special Educational Needs (BES)
- Specific Learning Disorders (DSA)
- diagnoses and health data;
- psychological information;
- family information;
- confidential school documents;
- administrative or contractual data.

5.5 Equity and inclusion

AI must be used in a way that does not create discrimination, exclusion, disparities or unjustifiably differentiated treatment among students, and must not lead to stigmatisation.

The School must pay attention to the risk that AI tools may produce responses that are stereotyped, culturally inappropriate, discriminatory or unsuitable for the students' age, and must ensure that materials generated or supported by AI are appropriate to the students' linguistic, cultural, cognitive and educational level.

AI may be used as support for students with Special Educational Needs, language difficulties, organisational difficulties or a need for compensatory tools, in compliance with individualised plans, the school's educational guidelines and privacy legislation.

Where Special Educational Needs, Specific Learning Disorders or other specific circumstances apply, the use of AI must be assessed on a case-by-case basis, involving the relevant professionals where appropriate.

6. ROLES AND RESPONSIBILITIES

6.1 Governing Body

The Governing Body is responsible for:

- approving and updating the *policy*;
- promoting internal training;
- assessing the risks associated with the adoption of AI tools;
- involving the privacy contact person, legal counsel or other competent parties where necessary;
- checking that the use of AI is consistent with legislation, privacy requirements and educational values;
- handling reports, incidents or improper uses.

6.2 School Staff

School staff are responsible for:

- using AI in a professional, informed and proportionate manner;
- always checking generated content;

- protecting student data;
- reporting issues or improper uses.

In particular, teaching staff are also responsible for:

- maintaining substantive control over assessment, feedback and teaching materials;
- informing students of the rules for using AI in each activity;
- educating students in the critical use of AI;
- not delegating their educational judgement to AI.

6.3 Students

Students are responsible for:

- following teachers' instructions;
- declaring their use of AI when required;
- not presenting AI-generated work as their own without understanding and reworking it;
- being able to explain what they submit;
- not using AI for inappropriate, offensive or harmful behaviour;
- protecting their own and others' privacy;
- using AI to support learning, not as a substitute for study.

6.4 Families

Families are invited to:

- take note of this *policy*;
- support responsible use of AI at home as well;
- prevent AI from replacing the student's own work;
- encourage transparency, autonomy and responsibility;
- cooperate with the School in the event of doubts or improper use.

In accordance with Art. 8 of Regulation (EU) 2016/679 (GDPR) and Art. 2-*quinquies* of Legislative Decree 196/2003 (Privacy Code), as amended by Legislative Decree 101/2018, which in Italy set the threshold at 14 years of age for validly giving consent to the processing of one's own personal data in relation to the direct offer of information society services, independent use of public generative AI tools that require the creation of an account is permitted for students who have reached the minimum age set by the platform's terms of service (normally 14 in Italy). Students below that age may use such tools only with the prior authorisation of those holding parental responsibility. Any further age limits set by the terms of use of individual tools must still be respected, and families are invited to check and enforce them.

6.5 Consultants and suppliers

Consultants and suppliers who use AI tools for school-related activities must comply with this *policy*, the applicable contractual agreements, confidentiality obligations, privacy legislation and the instructions received from the School.

They may not use AI tools to process school data, confidential materials or personal information without the School's prior written authorisation.

7. AI TRAINING AND LITERACY

The School promotes AI literacy programmes for teachers, school staff and students.

The topics will be defined during the school year.

8. IMPROPER USES

The following constitute, by way of example and without limitation, improper uses of AI by anyone operating within the school context (students, teachers, administrative and support staff):

- using AI in place of personal work, study, professional judgement, or assessment and feedback activities that require qualified human input;
- presenting AI-generated content as one's own without the required transparency declaration;
- disseminating AI-generated content without adequate verification, resulting in the circulation of inaccurate, misleading or outdated information;
- circumventing the levels of use permitted by the teacher or the rules laid down in this *policy*.

9. PROHIBITED USES

The following uses are prohibited within the School, also in accordance with the AI practices prohibited under Art. 5 of Regulation (EU) 2024/1689 (AI Act):

- using AI systems for facial recognition, biometric identification, emotion recognition or invasive surveillance of students;
- using AI to automatically assess students' achievement, behaviour, reliability, disciplinary risk or performance;
- using AI to profile students or families without an appropriate legal basis, privacy notice, prior assessment and authorisation from the school;
- entering unauthorised personal data;
- using AI for bullying, cyberbullying, discrimination, manipulation, impersonation or the production of harmful content;
- using AI to circumvent tests, assessments or school procedures;
- using AI tools to generate content that infringes the intellectual property rights or copyright of third parties, including the unauthorised reproduction of protected works used as input or substantially reproduced in the output;
- producing, modifying or disseminating content (texts, images, audio, video, deepfakes) that harms the dignity, image or reputation of the school, students, families or staff.

10. CONSEQUENCES AND REPERCUSSIONS

Improper use of AI may lead to educational, disciplinary, contractual, organisational or legal consequences.

Consequences must be proportionate to the seriousness of the violation, the nature of the person involved, the context, intent, any repetition and the harm caused. The measures adopted are consistent with the School Regulations, the disciplinary code, the applicable contracts, the privacy notices and current legislation. Annexes A and B of this *policy* set out and describe the consequences of prohibited/improper uses by students and teachers.

11. PRIVACY BREACHES AND INCIDENTS

Where improper use of AI results, or may result, in a personal data breach, the school must activate the internal procedures for handling privacy incidents. It must be assessed whether the event constitutes a personal data breach within the meaning of Art. 4(12) GDPR, whether it is necessary to involve the DPO or the privacy contact person, whether there is an obligation to notify the Italian Data Protection Authority within 72 hours of becoming aware of the event (Art. 33 GDPR) and to inform the data subjects (Art. 34 GDPR), and which corrective measures must be adopted. The school keeps an internal register of breaches and near-misses connected with the use of AI tools, in accordance with the GDPR and Law 132/2025.

12. MONITORING, REVIEW AND UPDATING

This *policy* is a constantly updated document.

The school may update it on the basis of:

- regulatory developments;
- new guidance from the Ministry, the Data Protection Authority or the European Union;
- new tools adopted by the school;
- issues arising in day-to-day use;
- feedback from teachers, students and families;
- results of internal surveys;
- teaching trials;
- incidents or reports;
- developments in AI technologies.

A review is recommended at least once a year and, in any case, whenever significant AI tools are introduced into the School's organisation.

13. COORDINATION CLAUSE

This *policy* is an internal document providing guidance on, and regulating, the responsible use of Artificial Intelligence within the school and applies to both institutes, Vittoria High Schools and Vittoria Junior. It must be coordinated with:

- the School Regulations;
- the disciplinary code;
- privacy policy and privacy notices;
- confidentiality agreements;
- employment contracts;
- contracts with collaborators and suppliers;

- procedures for handling privacy incidents.

In the event of conflict between this *policy* and higher-ranking documents or mandatory rules, the applicable statutory, contractual and regulatory provisions shall prevail.

ANNEX A - RULES FOR THE USE OF AI BY STUDENTS

A1. Permitted Uses

This *policy* defines two main areas of use for students

- A. Individual Study
- B. Completion of assigned tasks/activities

Students may use AI as a tool to support learning during individual study, provided this is done in accordance with the teacher's instructions, this *policy* and the School Regulations. AI may be used to gain a better understanding of a topic, receive alternative explanations, generate examples, organise ideas, create outlines, practise, simulate conversations or receive suggestions.

The following examples are suggested by way of illustration:

- asking for explanations on a topic;
- generating examples or analogies;
- brainstorming;
- creating a preliminary outline;
- receiving grammar or vocabulary suggestions;
- translating words or short phrases for comprehension purposes;
- practising with quizzes or questions;
- receiving clarification on complex passages;
- simulating a conversation in a foreign language;
- checking their understanding of a concept;
- organising their study.

When completing assigned tasks and activities, students must follow the guidelines set out in the subject programme or specific instructions given by the teacher.

In general, the following principles apply:

- In subjects where language is the vehicle for other content (e.g. scientific, technical or historical-social subjects), AI may be used to improve grammar and spelling without changing the meaning of, or adding content to, the student's work. An exception is made for IB *exam components* (EE, IA, TOK).
- In language subjects (e.g. Italian, English and other foreign languages), where grammatical, spelling and lexical competence is itself an object of learning and assessment, AI may not be

used to correct or improve the language of one's own work, unless the teacher explicitly indicates otherwise. In these contexts, AI may be used solely for study and comprehension purposes, in particular to clarify grammar or spelling rules, receive explanations or explore content in greater depth, but not to produce or refine the task being assessed.

All assigned tasks may, at any time and at the teacher's discretion, be subject to an oral presentation, questioning or explanation aimed at verifying genuine understanding and personal reworking of the content. Such verification is an ordinary, integral part of assessing learning; it is neither a disciplinary measure nor does it imply an accusation of improper use of AI.

A2. Student responsibility

Every student is responsible for what they submit, regardless of whether the work was produced with or without the support of AI.

When submitting an assignment, a piece of written work, a translation, a mathematical solution, a text, a presentation or a project, students must always be able to:

- explain the content and justify the steps taken;
- clarify the reasoning followed;
- reproduce a similar exercise;
- answer questions about the work submitted;
- demonstrate that they have understood what they have presented;
- distinguish their own contribution from that of the tool.

A3. Declaration of use

When using AI tools to complete assigned tasks/activities as indicated by the teacher, students must declare their use, specifying in which section or part of the work AI was used.

Template:

Prompt: "Prompt text", Name of the AI tool (e.g., ChatGPT), Version, Company, Date the content was generated, URL of the tool.

Example:

Prompt: "Describe the significance of the green light in *The Great Gatsby*", ChatGPT, version 4.0, OpenAI, 8 Mar. 2026, chatgpt.com.

A4. Prohibited Uses

During tests, oral examinations, written tests, quizzes, internal exams or assessment activities, the use of AI is prohibited unless expressly authorised by the teacher.

A5. Improper Uses

The following are considered improper uses of AI:

- submitting work generated wholly or partly by AI without the teacher's prior authorisation;
- presenting ideas, solutions, images, texts or arguments produced by AI as one's own;
- using AI to fully solve assigned exercises;

- copying AI answers without understanding them;
- failing to declare the use of AI when required;

A6. Sanctions

Improper, unauthorised or undeclared use of Artificial Intelligence tools by students will result in warnings and sanctions proportionate to the seriousness of the conduct, its intent, any repetition and the harm caused.

If the student is unable to explain or justify the content submitted, the teacher may consider the work as not done, incomplete, not assessable or to be redone, in accordance with the School Regulations and the applicable teaching guidelines. In doubtful cases, the procedure to be followed is directly discussing the matter with the student, involving the class coordinator and, if the matter is not resolved, referring it to the person responsible for the Regulations (Ms Genovese) to determine the sanction.

Procedure in case of doubt or undeclared use:

Where the teacher has doubts about the authenticity of the work submitted or about the undeclared use of AI tools, the following procedure applies:

1. Handling by the teacher: the teacher may independently investigate further through oral questioning or by asking the student to present/explain the work done. If the explanation is not sufficient, the teacher may require the work to be redone and record a note in the electronic register.
2. Discussion with the class coordinator: if doubts about the authenticity of the work remain at this stage and the student does not acknowledge the improper use of AI, the teacher may consult the class coordinator for a joint assessment of the case.
3. Policy contact person and Head of School: if the situation is still not resolved, the case is referred to the AI policy contact person, who assesses the matter, determines any sanction in accordance with the School Regulations and reports to the Head of School.
4. Once three notes have been recorded, the coordinator will call a meeting with the family, and disciplinary sanctions will be considered and communicated.

For the type, grading and application of sanctions, full reference is made to the School Regulations, the Educational Co-responsibility Pact and the other internal documents in force, which remain the main reference for disciplinary matters.

ANNEX B - RULES FOR THE USE OF AI BY TEACHERS

B1. Permitted Uses

Teachers may use AI tools that are authorised, or otherwise compliant with the School's guidelines, to support teaching and planning activities, in compliance with privacy rules and the principles set out in this *policy*. In particular, AI may be used for:

- preparing lesson outlines and instructional design;
- generating examples, exercises, case studies, simulations, quizzes or review questions;
- linguistic adaptation, simplification or rewording of texts;
- translation or language revision;
- supporting the production of inclusive materials and the design of differentiated activities;
- preparing remedial or enrichment activities;
- generating ideas for discussions, debates, writing prompts or interdisciplinary activities;
- supporting the marking of written work and the assessment of students (e.g. identifying errors, generating rubrics or preliminary organisation of scores), on the understanding that assessment cannot be delegated to AI and remains in all cases the sole responsibility of the teacher;
- Using minute-taking tools for organisational meetings, excluding end-of-term grading meetings (*scrutini*).

B2. Obligation to verify

All AI-generated content must be checked by the teacher before use.

Teachers must check:

- suitability for the students' age;
- consistency with the curriculum;
- absence of personal data or unauthorised confidential information.
- absence of bias, stereotypes or discriminatory content;
- compatibility with the level of the class;
- consistency with the school's values;
- absence of errors or fabricated information;
- linguistic, scientific and cultural accuracy;
- respect for copyright and sources, where relevant;

Final responsibility for teaching materials always lies with the teacher.

B3. Assessment

Student assessment remains the exclusive prerogative of the teacher and may under no circumstances be delegated, in whole or in part, to Artificial Intelligence systems. It is therefore prohibited to use AI tools to make assessment decisions, including the awarding of grades, decisions on promotion or failure, the determination of performance levels, rankings, disciplinary judgements and/or behavioural assessments.

To verify the authenticity of students' work, the school uses dedicated tools for detecting the use of generative AI, including *Turnitin*, which teachers may use as an aid to identify possible improper use by students. In this case too, the result provided by the tool is purely indicative and does not replace the teacher's judgement; every resulting decision rests with the teacher, in accordance with the School Regulations and the student's right to be heard.

B4. Guidelines for student assignments

In their planning document, teachers set out how AI may be used for assignments, homework, formative assessments and projects (*Extended Essay, Internal Assessments*, research papers and reports), specifying:

- the assignments for which AI is permitted;
- how it may be used;
- the citation style.

B5. Organisational and administrative uses

Teachers are permitted to use dictation and automatic transcription tools for non-assessment coordination meetings and class council meetings (CDC), as support in drafting minutes.

The class coordinator (or the designated minute-taker) remains in all cases responsible for the minutes produced and is required to treat them with the same care required for any content produced with the support of AI. In particular:

- the transcribed content must be checked and corrected before approval, in accordance with the principle of human responsibility set out in section 5.2;
- once drafted, the minutes must be stored and shared in accordance with the ordinary internal document management and data protection procedures.

B6. Sanctions

In the event of improper use by teachers or school staff, the School may consider the consequences provided for by the applicable National Collective Labour Agreement (CCNL) and by privacy legislation.

[Latest revision approved by the Teaching Board on 7 September 2026.]