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Digital Policy Hub

Digital Policy Hub — Working Paper

Embedding Critical Media Literacy in Ontario Schools' AI Policies

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Policy Memo

Embedding Critical Media Literacy in Ontario Schools' AI Policies

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Bottom Line Up Front

The rapid growth of artificial intelligence (AI) and generative AI, in particular, has become a significant focus in education. While generative AI tools offer many benefits for educational stakeholders, they also raise concerns, including, but not limited to, ethics, privacy and academic integrity. As these tools evolve, policy must move beyond a simple opt-in/opt-out framework. In the province of Ontario, Canada, many school boards have yet to adopt comprehensive policies on the responsible and ethical use of generative AI. Where AI guidelines do exist, they should be updated to align with principles of critical media literacy. This would enable educational stakeholders to assess the ethical and social impacts of generative AI in schools and determine responsible uses of these technologies, reflecting on effective co-creation.

Key Points

- In Ontario school boards, responsible AI use policies are still being developed, and most offer limited guidance on appropriate generative AI use for stakeholders.
- AI policies across Ontario school boards share some common features, but the clearest differences appear between English public and English Catholic district boards. Catholic school board policies tend to frame generative AI use in relation to Catholic educational values, often emphasizing holistic perspectives that recognize the physical, mental and spiritual development of a person.
- Existing Ontario school board policies on generative AI should be revised to incorporate key principles of critical media literacy that support deeper engagement with AI tools. This would encourage stakeholders to consider the benefits, drawbacks, and social and ethical implications of AI in education.

Recommendations

- **Recommendation 1:** Catholic school board policies often frame generative AI use through Catholic educational values, resulting in a stronger emphasis on holistic perspectives. This is evident in the AI guidelines developed by the Durham Catholic District School Board, the Peterborough Victoria Northumberland and Clarington Catholic District School Board, the Simcoe Muskoka Catholic District School Board, the Toronto Catholic District School Board) and the Waterloo Catholic District School Board. English public and English Catholic district school boards should therefore collaborate on shared guidelines. Public boards can draw on Catholic boards' approaches, adopting the non-Catholic-specific elements of their policies to strengthen existing practices, while clearly acknowledging that English public schools serve students from diverse religious backgrounds.
- **Recommendation 2:** Current AI use policies from five Ontario school boards — the Catholic District School Board of Eastern Ontario, the Halton District School Board, the Simcoe Muskoka Catholic District School Board, the Toronto Catholic District School Board and the Waterloo Catholic District School Board — include principles of critical media literacy to support understanding of complex media technologies, such as generative AI. Building on these examples, all Ontario school boards should revise their policies to more explicitly embed critical media literacy, foregrounding comprehensive approaches to critically assessing generative AI tools and using them for co-creation.

Introduction

Over the past several decades, digital technologies have been steadily integrated into global education systems to enhance learning (Selwyn 2016, 1; Zou et al. 2025). Among them are generative AI technologies, often presented as innate tools for improving learning (Selwyn 2019). Generative AI (sometimes referred to as GenAI) is defined as "a class of technology that uses machine learning techniques to learn from data similar to how the human brain processes information" (Peebles and Snyder 2024, 1). Despite its anticipated benefits, however, generative AI raises ethical and social concerns with significant implications for education, particularly when stakeholders are not well informed about plagiarism, privacy and security risks (Mittal et al. 2024; Selwyn 2019; Dempere et al. 2023). This ambiguity and mystification, especially in education, underscores the need for realistic policy frameworks in Canada.

Research on promoting responsible AI use in Canadian schools remains limited, particularly beyond the binary of simply opting in or out (Puzic 2023). In Ontario, many school boards have yet to adopt comprehensive policies. In an October 2024 bulletin, the Elementary Teachers' Federation of Ontario (ETFO) noted that "the federal government's *Artificial Intelligence and Data Act* (AIDA) includes no explicit provisions to address the unique challenges presented by using AI systems in public education, despite acknowledging that the 'information of minors is considered to be sensitive'" (ETFO 2024, 1). As a result, generative AI policies are currently determined by individual school boards (ibid.; Puzic 2023), and no concrete federal guidelines exist to inform policy development.

This working paper examines how and why comprehensive policies for responsible generative AI use in Ontario's K–12 education system should be developed through a *critical media literacy approach* (Kellner and Share 2019; Gennaro, Higdon and Hoechsmann 2024). Unlike traditional media literacy, critical media literacy goes beyond teaching efficient media use by emphasizing intentional engagement with media tools and technologies and healthy skepticism toward the governance of media systems (Buckingham 2003, 36; Kellner and Share 2019; Gennaro, Higdon and Hoechsmann 2024). This approach matters because it encourages people to become more engaged and prepared to make meaningful contributions in civic and political domains (Kellner and Share 2019, 6).

Overview: The Entry of Digital Technologies and Generative AI Tools in Educational Spaces

Digital technology has significantly reshaped how students learn in educational settings over recent decades (Selwyn 2016, 1; Zou et al. 2025, 1). The COVID-19 pandemic accelerated the use of these technologies (Patil 2021, 1) when school closures led many students to rely on digital tools. A frequently cited benefit of generative AI is its ability to offer personalized, goal-oriented learning (Mittal et al. 2024; Zou et al. 2025). However, although these technologies promise optimization and novel ways of completing tasks and generating ideas, they also raise notable concerns (Selwyn 2016, 5), including

"practical and ethical issues" such as academic dishonesty, partiality and factually incorrect information (Peebles and Snyder 2024, 2). In educational settings, generative AI must be used critically so that students can assess outputs, uphold academic integrity and contribute their own ideas, using these tools only to supplement their learning (ibid.).

Responsible Generative AI Policies for Ontario Education, Grounded in Critical Media Literacy

A critical media literacy approach can deepen understanding of how generative AI impacts education (Kellner and Share 2019; Gennaro, Higdon and Hoechsmann 2024). As Steve Gennaro, Nolan Higdon and Michael Hoechsmann (2024, 17–18) state, "Critical media literacy (CML) explores human interaction with media objects, texts, and structures by critically questioning representation, ideology, and economic issues within the media that explicitly and implicitly impact human social relations." Focused on power and social justice, critical media literacy encourages the examination of generative AI risks such as "privacy, data exploitation, disinformation, and the potential for addiction" (ibid., 197).

ETFO's bulletin poses seven guiding questions for educators, several of which align with critical media literacy. The most relevant are: "Am I using AI in a way that empowers educators and supports human rights, social justice, and student agency?"; "What are the potential barriers to accessing and using an AI tool?"; and "How do you ensure AI tools reflect human voice in its use and do not diminish critical thinking skills?" (ETFO 2024, 2). These questions underscore the need for educators to critically assess generative AI tools to safeguard their own autonomy and that of their students, while fostering balanced, effective co-creation.

Moreover, the Canadian Teachers' Federation (CTF) (2024, 2) observes that inconsistent AI policies have left schools without clear guidance for integrating generative AI tools while protecting key stakeholders' rights. The CTF accentuates concerns, including privacy, data security and bias, and proposes policy recommendations grounded in the United Nations Educational, Scientific and Cultural Organization's 2023 *Guidance for generative AI in education and research* (cited in ibid., 3–4). Overall, the ETFO and the CTF focus on diminishing potential harms associated with AI use in education. A critical media literacy approach to generative AI policy development can help Ontario school boards prioritize both harm reduction and critical thinking as interconnected goals of social justice education (Kellner and Share 2019; Gennaro, Higdon and Hoechsmann 2024).

Research Questions

This working paper addresses two research questions (RQs) to examine how current Ontario school board policies address the use of generative AI and how critical media literacy can strengthen these policies to promote robust critical thinking about generative AI tools among educational stakeholders:

- RQ1: Do current Ontario school board policies offer clear and comprehensive guidelines for the responsible use of generative AI?
- RQ2: How can a critical media literacy approach inform the design and implementation of policies for the responsible use of generative AI in Ontario schools?

Content Analysis of Ontario School Boards' Generative AI Use Guidelines

To address RQ1, "Do current Ontario school board policies offer clear and comprehensive guidelines for the responsible use of generative AI?," all currently available Ontario school board generative AI policies were reviewed. The terms "clear" and "comprehensive" were operationalized using the coding rubric presented in Table 1.

Table 1: Rubric for Evaluating Current Generative AI Policies

Indicator	Guiding Criteria
Clarity	• Does the policy use clear, accessible language? • Does it provide definitions and examples of appropriate AI use?
Comprehensiveness	• Does the policy provide detailed coverage of key areas such as ethical considerations, privacy, bias, misinformation and implementation? • Does it address multiple stakeholder groups and contexts of use?

Source: Author.

Ontario has 72 district school boards across four systems: English public, English Catholic, French public and French Catholic.[1] Fourteen of the boards currently have publicly available generative AI policies, as shown in Table 2. Six of the 14 policies reviewed provided *clear and comprehensive* guidelines: those of Eastern Ontario, Peel, Peterborough Victoria Northumberland Clarington (PVNC), Simcoe Muskoka, Waterloo and York Region. The Catholic District School Board of Eastern Ontario (2025) and the Waterloo Catholic District School Board (2026) particularly excelled by including dedicated sections on the personal, social, environmental and ethical implications of generative AI tools, and for recognizing potential impacts on Indigenous communities and other stakeholders. The Peel District School Board (2024, 2), the PVNC Catholic District School Board (2025, 5) and the Simcoe Muskoka Catholic District School Board (n.d., 10) also, respectively, addressed social justice consequences of AI, explained forms of misinformation and disinformation, and emphasized critical thinking and digital literacy. The York Region District School Board's guidelines included both a student guide (n.d.-a) and educator AI guidelines (n.d.-b); however, they were created with the assistance of an AI language model, raising questions about the inclusion of critical human perspectives.

Six other policies, developed by the Durham, Halton, Ottawa-Carleton, Ottawa Catholic, Toronto and Upper Canada boards, provided *somewhat clear and comprehensive* guidelines. For instance, the guidelines of the Durham Catholic District School Board (2025) focus solely on three pillars aligned with Catholic school values, whereas the guidelines from the Ottawa-Carleton District School Board (n.d.-a) are clear but insufficiently detailed. Ottawa-Carleton could strengthen its "AI and Emerging

1 See www.ontario.ca/page/education-facts.

Technologies Framework" by expanding sections such as "Fostering Critical Thinking & Problem Solving," to specify *how* "students and staff [will be effectively equipped] with the skills to evaluate and use AI and emerging technologies" (ibid.).

Conversely, two policies developed by the Niagara and the Simcoe County boards lacked comprehensiveness and offered limited direction on how educational stakeholders should use generative AI tools. Table 2 provides a more detailed overview of all 14 policies, indicating whether they include clear, comprehensive guidelines, and outlining their unique features and key strengths.

Table 2: Summary of Current AI Usage Guidelines in Ontario School Boards

School Board/ Policy Cited	Inclusion of Clear, Comprehensive Guidelines?	Unique Features or Key Strengths
Catholic District School Board of Eastern Ontario (2025)	**Clear and comprehensive**. Defines AI, generative AI and large language models. Notable sections: "Bias," "Transparency and Accountability," "Critical Thinking," "Misinformation and Disinformation" and "Environmental Considerations" (pages 3–5).	**Note:** Among the most clear and comprehensive guidelines available. **Key strengths:** • addresses critical thinking along with social, environmental, ethical and privacy implications of AI; and • provides 22-word glossary.
District School Board of Niagara (n.d.)	**Somewhat clear; not comprehensive.** Vague outline of AI use policies, basic safety guidance and consequences for violating teachers' AI rules for students in grades 9–12.	**Unique feature:** "AI Integration Scale" (developed in 2025, and accessible via link in section "Can I use AI for my school work?")
Durham Catholic District School Board (2025)	**Somewhat clear and comprehensive.** Defines AI, its role in education and three pillars: "Reinforcement of Learning," "Building Responsibility" and "Spiritual Integration." AI use "must align with Catholic values" (page 1).	**Key strength:** Three pillars aligned with Catholic school values.
Halton District School Board (2025)	**Somewhat clear and comprehensive.** Emphasizes critical thinking about generative AI and students' digital literacy skills. Addresses bias and the potential for AI tools to "hallucinate" (page 3).	**Unique feature:** Parents/guardians' consent form for student use of teacher-employed AI tools.
Ottawa-Carleton District School Board (2025a, 2025b)	**Somewhat clear and comprehensive.** AI and Emerging Technologies Framework discusses "Human Centered Use of AI for Learning," with additional guidelines for grades 9–12 students.	**Key strength:** AI and Emerging Technologies Framework: "Students and staff will be equipped to safeguard Indigenous ways of knowing."
Ottawa Catholic School Board (2025a, 2025b, 2025c)	**Somewhat clear and comprehensive.** Guiding principles for grades K–6 and 7–12: "Prioritize Humane & Ethical Use," "Focus on Education & Learning," "Champion Equity & Justice," "Be Transparent" and "Safeguard Privacy, Security & Data Protection."	**Key strengths:** • emphasizes critical thinking skills for assessing AI-generated material; • age-appropriate language for each grade band; and • AI FAQ for parents/guardians.

Peel District School Board (2024)	**Clear and comprehensive.** Defines AI systems and generative AI; encourages educational stakeholders to "Build their AI literacy and critical consciousness to be able to detect biases of AI" (page 9).	**Key strength:** Section on the principle of "Equity and Human Rights," outlining the social justice implications of AI (page 7).
PVNC Catholic District School Board (2025)	**Clear and comprehensive.** Defines and explains different types of AI (section 2.0); discusses generative AI risks, including privacy, bias and mis- and disinformation (section 3.0). AI use must align with "PVNC Catholic Guiding Principles" (section 6.8).	**Key strength:** Describes various forms of misinformation and disinformation (section 3.6).
Simcoe County District School Board (n.d.)	**Clear; not comprehensive.** Single webpage describing AI and generative AI, with "Critical Thinking & Digital Literacy" listed as a classroom benefit.	**Key strength:** Guiding principles for AI use: "Informed," "Honest," "Safe," "Active" and "Creative."
Simcoe Muskoka Catholic District School Board (n.d.)	**Clear and comprehensive.** Guidelines aligned with Catholic principles for students, educators, school leaders, system leaders and administrators (page 3). Describes AI and generative AI (pages 4–5).	**Key strengths:** • "Ethical Considerations for Educational Use" (page 5); and • "Critical Thinking, Digital Literacy, and Catholic Social Teachings" (page 10).
Toronto Catholic District School Board (2024)	**Somewhat clear and comprehensive.** Addresses generative AI and responsible use for the board, positioning digital literacy as foundational for learning about generative AI (page 3). Generative AI adoption must be in agreement with "Catholic teachings" (page 3).	**Key strengths:** • principles on how AI tools can support critical thinking; and • addresses ethical generative AI use (page 4), privacy and data security (page 5).
Upper Canada District School Board (2026)	**Somewhat clear and comprehensive.** Explains AI and generative AI tools (page 2) aligned with the Ontario Ministry of Education's list of "transferable skills" (page 3).	**Key strength:** Four-part framework: Digital Literacy: Safety, Cyber Security, and Online Privacy Awareness," "Ethics and Equity," "Transparency and Academic Integrity," and "Enhancing Teaching and Learning with AI" (page 4).
Waterloo Catholic District School Board (2026)	**Clear and comprehensive.** Outlines "faith-informed" principles: "Discernment in a Changing World," "Transparency & Truthfulness," "Stewardship of Data, Privacy, and Trust," "Accountability Remains Human," "Equity, Justice, and the Common Good," "Formation Over Automation" and "Human Dignity Comes First" (page 4).	**Note:** Among the most clear and comprehensive guidelines available. **Key strengths:** • broad scope, relevance to diverse stakeholders and recognition of Indigenous approaches to ethical, responsible AI use; and • glossary with 28 AI-related terms (page 51).
York Region District School Board (n.d.-a, n.d.-b, n.d.-c)	**Clear and comprehensive.** Explains AI and how it can support learning, with guidelines for students (grades 7–12; n.d.-a) and educators (n.d.-b) and an AI glossary (n.d.-c). Student and educator AI guidelines were developed with the assistance of an AI language model.	**Key strengths:** The "EVERY" method — for *evaluate, verify, edit, revise* and *you* are responsible (n.d.-a); AI glossary with 23 terms (n.d.-c) — it is unclear whether it, too, was developed using AI.

Source: Author.

Table 2 shows that although the 14 policies share several commonalities, clear differences emerge between English public and English Catholic district school boards. Several Catholic board policies explicitly connect generative AI use to Catholic educational values, often placing greater emphasis on holistic perspectives that consider the "growth of the whole person — body, mind, and soul" (Miller 2014, 2). This is evident in the AI-use guidelines of the Durham, PVNC, Simcoe Muskoka, Toronto and Waterloo Catholic boards, as indicated in Table 2.

Accordingly, this paper's first recommendation is that English public and English Catholic district school boards collaborate on shared guidelines. English public boards should adopt the non-Catholic-specific elements of English Catholic district board policies to strengthen current practices, making clear that public schools serve students from diverse religious backgrounds.

Critical Media Literacy for Developing Responsible Generative AI Use Policies in Ontario

To address RQ2, "How can a critical media literacy approach inform the design and implementation of policies for the responsible use of generative AI in Ontario schools?," the 14 Ontario school board policies were analyzed using Douglas Kellner and Jeff Share's six core concepts of critical media literacy and their accompanying questions as an analytic lens to identify parallels and opportunities to strengthen existing approaches (Kellner and Share 2019).

Kellner and Share's Six Core Concepts of Critical Media Literacy and Accompanying Questions

When developing policies for responsible AI use in Ontario schools, policy makers can draw on the six core concepts of critical media literacy identified by Kellner and Share (2019, 8). Their comprehensive framework integrates contributions from diverse global experts and institutions, and is valuable because it encourages media users to ask evaluative questions to critically examine media texts, including issues of bias and social justice. The first concept, "Social Constructivism," suggests that information is collectively created based on social norms. The second, "Language/Semiotics," emphasizes that media materials offer unique forms of interaction as a result of "specific grammar and semantics." The third, "Audience/Positionality," posits that audiences interpret media materials in diverse ways, based on their lived experiences. The fourth, "Politics of Representation," underscores that messages are partial and shaped by the medium. The fifth, "Production/Institutions," argues that media materials are produced within dominant social systems to advance particular agendas. The sixth, "Social and Environmental Justice," asserts that media shapes stereotypes and beliefs and "is never neutral." Together, these concepts support critical analysis of media technologies and reflection on new forms of communication and connection.

Kellner and Share (ibid.) identify six critical questions that accompany their core concepts. The first asks “who” is responsible for generating a certain media text; the second examines “how” it is created and distributed. The third also asks “how,” focusing on its diverse interpretations, while the fourth asks “what” ideas have shaped it. The fifth asks “why,” examining the intent behind its production, and the sixth asks “whom” it might “advantage” or “disadvantage.”

Initially designed for media texts, this framework can be applied to AI in education. Asking “who” creates specific generative AI models encourages reflection on the powerful technology conglomerates behind them. Asking “how” AI models are designed and employed, particularly in educational contexts, highlights their technical features, as well as their privacy and data implications. Adapted in this way, Kellner and Share’s framework provides a basis for critically analyzing AI’s aims, consequences and benefits in educational settings and for developing responsible generative AI use policies. Critical media literacy is essential to this process because it helps analyze AI-generated misinformation and disinformation, assess information and references, and counter the erosion of public trust (Gennaro, Higdon and Hoechsmann 2024, 197). It also supports analysis of how AI tools and technologies affect privacy and data (ibid.).

Ontario School Board Policies and Kellner and Share’s Six Core Concepts

Of the 14 available Ontario school board policies, five (Eastern Ontario, Halton, Simcoe Muskoka, Toronto and Waterloo) include guidelines aligned with Kellner and Share’s six core concepts of critical media literacy. For example, the Catholic District School Board of Eastern Ontario (2025, 9) frames AI literacy as requiring “a strong focus on media literacy, critical thinking, and ethical considerations. Students who learn to effectively collaborate with AI tools will be empowered to critically evaluate media and make ethical choices concerning AI tool usage and content creation.” This framing implicitly addresses all six of Kellner and Share’s core concepts, as described above, and suggests that AI literacy emerges from critical media literacy rather than existing as a stand-alone concept. Moreover, the Halton guidelines emphasize the need to “examine critically how the output of Gen AI is informed by a Western narrative and worldview that perpetuates and replicates a colonial bias which can lead to erasure and the extraction of data that negatively impacts Indigenous people’s right to education without discrimination” (Halton District School Board 2025, 3). This principle aligns with Kellner and Share’s sixth question about “whom” a given medium may “advantage” or “disadvantage” (Kellner and Share 2019, 8). Additionally, in a section titled “Critical Thinking, Digital Literacy, and Catholic Social Teachings,” the Simcoe Muskoka guidelines state: “Integrating AI tools in education should prioritize digital literacy and critical thinking, ensuring students engage responsibly. By fostering discernment and ethical responsibility, students learn to question AI’s output and integrate it meaningfully with their own ideas and knowledge” (Simcoe Muskoka Catholic District School Board, n.d., 10). As with Eastern Ontario’s reference to AI literacy, Simcoe Muskoka’s emphasis on critical thinking and digital literacy as integral to learning about AI is implicitly tied to the six core concepts.

The Toronto Catholic District School Board (2024, 3–4) offers guidelines for using AI tools to support, rather than replace, the critical thinking and development of interpersonal strengths central to students’ development: “A Discerning Believer Formed in the

Catholic Faith Community," "An Effective Communicator," A Reflective and Creative Thinker," "Self-Directed, Responsible, Lifelong Learner," "A Collaborative Contributor," "A Caring Family Member" and "A Responsible Citizen." As with Eastern Ontario's guidelines, these principles indirectly address all six of the core concepts described by Kellner and Share (2019, 8). Lastly, Waterloo includes a section titled "AI Through the Medicine Wheel," which introduces four principles: "North — Mental," "East — Spiritual," "South — Emotional" and "West — Physical" (Waterloo Catholic District School Board 2026, 13). Within this framework, particularly in the "North — Mental" quadrant, critical thinking is foregrounded through the following question: "Bias, ownership, whose voices shape AI?" (ibid.). This parallels Kellner and Share's (2019, 8) first accompanying question about "who" is responsible for generating a media text.

Given that these five boards' current guidelines already align, at least in part, with Kellner and Share's six core concepts and accompanying questions, this paper's second recommendation is that all Ontario school boards revise their policies to more explicitly reflect critical media literacy approaches. The analysis shows that the Eastern Ontario, Halton, Simcoe Muskoka, Toronto and Waterloo district school boards all include guidelines that emphasize approaches to critically assessing and co-creating with generative AI tools. Although there is not yet evidence that these policies are leading educational stakeholders, in particular, students, to engage more critically with generative AI, their comprehensiveness provides a strong starting point.

Conclusion: Toward Responsible Generative AI Use Policies Informed by Critical Media Literacy

As generative AI tools rapidly advance, all Ontario school boards should adopt robust policies that carefully consider the benefits and drawbacks for students, educators and other stakeholders. Among the 14 Ontario school boards with AI use policies, six provide clear and comprehensive guidelines, six offer somewhat clear and comprehensive direction, and two remain relatively vague. Several Ontario Catholic school boards, in particular, have developed comprehensive guidelines that underscore the holistic nature of learning from and engaging with generative AI, with some incorporating critical media literacy principles. A critical media literacy framework should therefore be central to the ongoing development of responsible generative AI use policies in Ontario school boards, supporting a necessary shift toward understanding the social, political and personal implications of media, including generative AI (Buckingham 2003, 36; Kellner and Share 2019; Gennaro, Higdon and Hoechsmann 2024).

Recommendations

- **Recommendation 1:** Catholic school board policies often frame generative AI use through Catholic educational values, resulting in a stronger emphasis on holistic perspectives. This is evident in the AI guidelines developed by the Durham, PVNC, Simcoe Muskoka, Toronto and Waterloo Catholic school boards. English public

and English Catholic district school boards should therefore collaborate on shared guidelines. Public boards can strengthen existing practices by adopting non-Catholic-specific elements from Catholic boards' approaches, while recognizing that English public schools serve students from diverse religious backgrounds.

- **Recommendation 2:** AI policies from five Ontario school boards — Eastern Ontario, Halton, Simcoe Muskoka, Toronto and Waterloo — emphasize critical media literacy to support an understanding of complex media technologies such as generative AI. Building on these examples, all Ontario school boards should revise their policies to embed critical media literacy more explicitly, focusing on critically assessing generative AI tools and using them for co-creation.

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