Use of artificial intelligence (AI) policy

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Governor(s) responsible	Ian Whyman
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1. Aims and scope

Here at Warden Hill Primary School we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, to enhance teaching and learning, customise learning experiences and support staff wellbeing through workload reduction.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations.

Therefore, the aim of this policy is to promote an understanding of, and establish guidelines for, the ethical, secure and responsible use of AI technologies among students and staff.

This policy covers the use of AI tools by school staff, governors and pupils. (See Appendix 1 please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, governors and pupils for a future in which AI technology will be an integral part
- Promote equity in education by using AI to address learning gaps and provide personalised support
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR

Definitions

This policy refers to both 'open' and 'closed' generative AI tools. These are defined as follows:

- Open generative AI tools are accessible and modifiable by anyone. They may store, share or learn from the information entered into them, including personal or sensitive information
- Closed generative AI tools are generally more secure, as external parties cannot access the data you input

2. Legislation

This policy reflects good practice guidelines/recommendations in the following publications:

- AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence
- Generative artificial intelligence (AI) and data protection in schools, published by the Department for Education (DfE)

This policy also meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020
- Data Protection Act 2018 (DPA 2018)
- Keeping Children Safe in Education 2026

3. Regulatory principles

We follow the 5 principles set out in the AI regulation white paper.

Regulatory principle	We will:
Safety, security and robustness	• Ensure that AI solutions are secure and safe for users and protect users' data. • Ensure we can identify and rectify bias or error. • Anticipate threats such as hacking.
Appropriate transparency and explainability	• Be transparent about our use of AI, and make sure we understand the suggestions it makes.
Fairness	• Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate
Accountability and governance	• Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	• Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology

- Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment

4. Roles and responsibilities

4.1. AI leads

Our generative AI leads are Mark Bailey and Sam Williams. They are responsible for the day-to-day leadership, ownership and management of AI use in the school.

4.2. Governing board

The governing board will:

- Take overall responsibility for monitoring this policy and holding the headteacher to account for its implementation in line with the school's AI strategy
- Ensure the AI leads and Headteacher are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school
- Adhere to the guidelines below to protect data when using generative AI tools:
    - Use only approved AI tools (see section 5 and appendix 1)
    - Seek advice from the AI lead and the designated safeguarding lead, as appropriate
    - Check whether they are using an open or closed generative AI tool
    - Ensure there is no identifiable information included in what they put into open generative AI tools
    - Acknowledge or reference the use of generative AI in their work
    - Fact-check results to make sure the information is accurate

4.3. Headteacher

The headteacher will:

- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Liaise with the DSL to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the school's child protection and safeguarding policy
- Ensure that the guidance set out in this policy is followed by all staff
- Review and update this AI policy as appropriate, and at least annually
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure pupils are taught about the effective use and potential risks of AI
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, AI Leads and data protection impact assessments

4.4. Data protection officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO is Gloucestershire County Council and is contactable via telephone: 01452 425098 and email: schoolsdpo@Gloucestershire.gov.uk

4.5. Designated safeguarding lead (DSL)

The DSL is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI
- Updating and delivering staff training on AI safeguarding threats
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE) and the school's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices

The school's DSL is James Antonious and is contactable via email: jantonious@wardenhill.gloucs.sch.uk

4.6. All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- Use only approved AI tools (see section 5 and appendix 1)
- Seek advice from the AI lead as appropriate
- Report safeguarding concerns to the DSL in line with our school's child protection and safeguarding policy
- Check whether they are using an open or closed generative AI tool
- Ensure there is no identifiable information included in what they put into open generative AI tools
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

4.7. Pupils

Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

5. Staff and governors' use of AI

5.1. Approved use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete, but cannot replace the judgement and knowledge of a human expert.

Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff or governor using an AI-generated plan, policy or document should

only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it.

Always consider whether AI is the right tool to use. Just because the school has approved its use doesn't mean it will always be appropriate.

5.2. Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the headteacher to discuss any ideas they may have with regards to using AI, so the headteacher can take the suggestions forward if they deem it to be a satisfactory new method of working.

The headteacher is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the AI Leads, the DPO and data protection impact assessments.

Before approval, new AI tools will be assessed against safeguarding, data protection, accessibility, equality, security and educational suitability criteria. Where appropriate, a Data Protection Impact Assessment (DPIA) will be completed.

5.3. Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Warden Hill Primary School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy.
https://wardenhill.gloucs.sch.uk/statutory-information/policies/
Please also refer to section 10 of this policy.

5.4. Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Pupils own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

Pupils' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright.

Parents are requested to give permission for their child's work to be used in AI models to improve pupil outcomes, see Appendix 2. Teachers must be aware of any child whose parents have not given their consent and not use their work within AI models.

5.5. Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output e.g. male scientists in lab coats etc.

We will ensure we can identify and rectify bias or error by training staff in this area.

The online safety lead and the computing team review our use of AI on a termly basis, and as part of the annual review of this policy, to identify and correct any biases that may arise.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.
https://wardenhill.gloucs.sch.uk/statutory-information/policies/

5.6. Raising concerns

We encourage staff and governors to speak to the headteacher in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with our school's child protection and safeguarding policy.

5.7. Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our school's equality policy when using generative AI tools https://wardenhill.gloucs.sch.uk/statutory-information/policies/
- Consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output
- Fact and sense-check the output before relying on it

Staff and governors must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

6. Educating pupils about AI

Here at Warden Hill we acknowledge that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI.

While children in years 3 and 4 are less likely to be using AI in classrooms than years 5 and 6, they may use AI overviews when searching/researching to find effective information quickly. In Years 3 to 6 pupils are progressively taught about the potential benefits and risks of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content
- How AI can be used to generate convincing misinformation, disinformation, fake news, manipulated images and fabricated evidence, and how to critically evaluate the authenticity of online content.

7. Use of AI by pupils

We recognise that AI has many uses to help pupils learn.

Pupils may use AI tools within lessons:

- As a research tool to help them find out about, or summarise complex information on, topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images.

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs.

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, pupils should reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

Pupils must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully or harass another person
- Generate or share explicit or offensive content, including, but not limited to, generating content which may be seen as harassing or bullying, generate AI content which impersonates pupils or staff, generate inappropriate or sexualised images e.g. nudification, deepfakes or any AI generated intimate imagery.
- Input offensive, discriminatory or inappropriate content as a prompt

8. Staff training

Staff are regularly supported through continued professional development by the AI leads, who themselves have regular training provided by external experts. This will ordinarily be delivered in staff meetings, but also through twilights and INSETS and will include:

- All staff having a good understanding of the range of AI tools and their purposes
- The relative benefits and risks of using different tools, as outlined above.
- The impact and responsibilities of using AI on safe internet use and online safeguarding
- Annual safeguarding training will include emerging risks associated with artificial intelligence, including deepfakes, AI-generated imagery, impersonation, online exploitation and misinformation.

9. Referral to our child protection and safeguarding policy

The school is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material
- Harmful content

- Harmful advertisements and promotions
- Bullying

Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the school's child protection and safeguarding policy and child protection referral process https://wardenhill.gloucs.sch.uk/statutory-information/policies/

10. Breach of this policy

10.1. By staff

Breach of this policy by staff will be dealt with in line with our staff code of conduct.

Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- During or outside of working hours
- On an individual's own device or a school device
- At home, at school or from a remote working location

Staff members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- The generative AI application in question (whether or not it is one authorised by the school)
- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the headteacher immediately.

10.2. By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy https://wardenhill.gloucs.sch.uk/statutory-information/policies/

11. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by the AI Leads whenever there is a significant change to either AI use by the school or the associated risks of AI usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

The policy will be shared with the full governing board at least annually.

All teaching staff are expected to read and follow this policy. AI leads and DSL responsible for ensuring that the policy is followed.

AI Leads will monitor the effectiveness of AI usage across the school.

We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Safeguarding/child protection policy
- Assessment policy
- Homework policy
- Behaviour policy
- Staff code of conduct
- Marking and feedback policy
- Computing acceptable use policy
- Online safety policy
- Equality policy

Appendix 1:
Approved uses of AI tools (table)

Note that open-source AI tools / open AI tools, meaning tools that anyone can access and modify, should only be used for tasks that don't require personal information to be input.

This list is not exhaustive, but permission must be sought from AI leads to use other AI tools.

Approved AI Tools	Approved For	Approved Uses
Large Language Models		
Chat GPT Google Gemini Microsoft CoPilot Claude	Teachers Governors	Classroom learning purposes • Lesson planning • Explaining concepts • Generating practice questions • Feedback in writing (in accordance with 5.4.) • Supporting with the creating of WAGOLLS to focus on specific skills. • Inclusive/adaptive practices to support the needs of all learners Administrative purposes including but not exclusive to: • Letter to parents/carers • Job descriptions and adverts • Document Summaries • Interview questions • Non-personal e-mail generation
Other tools with multiple purposes		
Twinkl Ari	Teachers Governors	• Creating specific learning resources • Quiz generation • Lesson planning • Administrative tasks
Teach Mate.ai	Teachers Governors	• Lesson planning • Policy writing • Other administrative tasks
Specific use AI tools		
LbQ	Teachers Pupils	• Classroom tasks relating to the curriculum • Home learning
TT Rockstars	Teachers Pupils	• Times table practice in school. • Times table practice at home.

Shuffle Buddy	Teachers	Seating arrangements in class which factor specific criteria.
Notebook.LM	Teachers Governors	Generating lesson-enhancing content based on teacher-provided sources e.g. videos, podcasts, mindmaps and quizzes.
Gamma	Teachers Governors	Presentation generator

Appendix 2:
Letter to seek permission for use of pupil work in AI

Dear Parents and Carers,

At Warden Hill, we are always looking for new ways to make learning exciting and effective. We're writing to tell you about how we use Artificial Intelligence (AI) to enhance children's learning. Artificial intelligence is a fast-moving area which children will increasingly need to understand, and which we think is of great potential benefit for both staff and children.

There are two broad ways in which our school might use AI: firstly by teaching staff in order to enhance the learning experiences of children and secondly by children themselves using programs carefully selected by teachers. All of our use conforms to our 'Use of AI in School' policy. A practical example of how AI might be used would be to summarise the complex information found in academic publications above children's typical reading levels e.g. In Year 4, when looking at classifying living things in science, to identify which characteristics of a vertebrate would classify them as a reptile.

As an example of how it might be used with pupils' work, we may want to use secure AI tools to look at children's writing by photographing a cross-selection of pupil outcomes. This writing is collated by the AI tool and in collaboration with the teacher detailing the learning intentions, can then provide synthesised feedback and class-wide next steps. The goal isn't simply to spot mistakes like spellings - it's to help both teachers and pupils understand the next steps in children's learning and to present these in different or interesting ways. By looking at children's work, AI tools might, among other things:

- Spot Patterns: Help children to see common mistakes that are made and turn mistakes into opportunities for everyone to learn.
- Boost Writing Skills: Give helpful tips on how sentence structure might impact the reader, or on how to use better language in very specific situations. For example, which of the 100+ words for 'good' might be appropriate to best describe a character in their narrative.

Keeping work safe and private

Your child's work belongs to them and keeping their information private is our top priority. With that in mind, we will always ensure work is:

Anonymous: Before the AI sees anything, we remove all names, places or personal references. The tool only sees the words and sentences, never who wrote them.

Private & Secure: Your child's work won't be posted online or shared publicly. It's used only for learning within our secure school system. We are using only using select tools and using them in accordance with DfE guidance.

To make this work, we need your consent to use your child's anonymous work.

Please complete the Eduspot response to confirm you are happy for us to use work in this way in order to enhance your child's learning.

Thank you so much for your support,

Mark Bailey and Sam Williams (Computing and AI Leads)