Artificial Intelligence Policy

April 2026

Introduction

In our school, we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation. 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 establish guidelines for the ethical, secure and responsible use of AI technologies across our whole school community. This policy covers the use of AI tools by school staff, governors and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

Aims:

1. To support the use of AI to enhance teaching and learning
2. To support staff to explore AI solutions to improve efficiency and reduce workload
3. To prepare staff, governors and pupils for a future in which AI technology will be an integral part
4. To promote equity in education by using AI to address learning gaps and provide personalised support
5. To ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils
6. To protect the privacy and personal data of staff, governors and pupils in compliance with 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

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)

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

Roles & Responsibilities

Our generative AI Lead is the Headteacher. They are responsible for the day-to-day leadership, ownership and management of AI use in the school – see below.

Headteacher

The Headteacher will:

- Take responsibility for the day-to-day leadership and management of AI use in the school Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- 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

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 Data Protection Officer: Darren Hobson

Email: info@mobile-sbm.com

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

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, using 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 Appendix 1)
- Seek advice from the Headteacher, as appropriate
- Report safeguarding concerns to the DSL (Headteacher) 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 (see Appendix 2: Examples of personal, sensitive and identifiable data)
- 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 staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

Governors

The governing board will:

- Take overall responsibility for monitoring this policy and holding the Headteacher to account for its implementation
- Ensure the Headteacher is 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 Appendix 1)
  • Seek advice from the Data Protection Officer 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

Pupils

Pupils must:
- Understand and follow the school's Acceptable Use Policy
- Follow the guidelines set out in Appendix 3 of this policy ('Use of AI by Pupils')

Staff and Governors' use of AI

Approved use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools, such as ChatGPT, can help make certain written tasks more efficient, but they do not replace the professional judgement, subject expertise or safeguarding responsibilities of a trained adult. At School, staff may choose to use generative AI in the following approved ways:

• Moderating pupil writing by uploading photographs or transcriptions of anonymised work (e.g. with no names or identifiable features) to compare, evaluate or generate feedback.
• Drafting curriculum documents, teaching resources, or subject overviews.

• Creating or improving report comments, policy drafts, or display text.
• Supporting planning for assemblies, educational letters, or home learning materials.
• Generating scaffolded versions of lesson materials to support differentiated learning.

All use of AI by staff and governors must comply with our data protection expectations:
• No names, initials, photos with faces, or references to specific children should be used in AI tools.
• If pupil work is shared via photo or text, it must be fully anonymised and cannot include any identifiers.
• Staff must never use AI tools to process safeguarding, health, or behaviour records.

All plans, policies, reports, or resources created with AI must be:
• Clearly attributed (e.g. “drafted with support from ChatGPT” where appropriate).
• Checked carefully for factual accuracy, tone, and alignment with school ethos and current statutory guidance.
• Approved by the member of staff as their own professional contribution before wider use or distribution.

AI tools should be viewed as a supportive assistant, not a replacement for expertise. Their use should always be purposeful, ethical, and proportionate to the task. If unsure whether AI is appropriate for a specific use, staff should consult with a senior leader or the DPO.

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 approving new uses of AI, or new AI tools, considering advice from the DPO and data protection impact assessments.

Data Protection and Privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data (see Appendix 2) into unauthorised generative AI tools or chatbots. If personal and/or sensitive data is entered into an unauthorised generative AI tool, School will treat this as a data breach and will follow our data breach procedure in these circumstances.

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, which 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 a valid exemption under copyright law.

At School, when using generative AI tools such as ChatGPT to support assessment moderation using anonymised pieces of pupil work, we will ensure that the “chat history” setting is turned off. This setting disables data logging and ensures our inputs are not used to train AI models. This forms part of our wider data protection and intellectual property responsibilities. Exemptions to copyright are limited - we will always seek legal advice if we are unsure whether our actions fall within the law.

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. We will ensure we can identify and rectify bias or error by training staff in this area. We also regularly review our use of AI 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 because of AI use, these will be dealt with through our usual complaints procedure.

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 (Headteacher) in accordance with our school’s Child Protection and Safeguarding policy.

Ethical and Responsible Use

We will always:
- Use generative AI tools ethically and responsibly
- Remember the principles set out in our school’s Equality scheme & accessibility plan when using generative AI tools
- 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

Educating Pupils about AI

At School, we recognise the importance of equipping pupils with the digital literacy, critical thinking, and ethical understanding needed to navigate artificial intelligence in society. Our computing curriculum provides structured, age-appropriate learning from EYFS to Year 6 in AI, online safety, and digital wellbeing.

Through the curriculum, pupils learn:

- **Responsible Creation and Use of Digital Content**

Pupils learn how to safely use tools and understand issues such as personal data protection, respect for copyright, and appropriate digital behaviour across all ages.

- **Online Safety and Awareness of Risk**

Through online safety units, pupils progressively build an understanding of phishing, misinformation, bullying, digital footprints, and algorithms.

- **Evaluation of AI-Generated Content**

Pupils are taught that AI outputs may be unreliable or biased and learn strategies to cross-check information, ask questions, and consider context. This supports healthy scepticism and encourages reflection on AI's limitations.

- **How Digital Information is Organised and Ranked**

Lessons introduce search tools, databases, spreadsheets, blogging, and coding, helping pupils understand how information is structured, accessed, and communicated digitally.

- **Ethical Considerations and Personal Responsibility**

Pupils explore the implications of AI on self-representation and privacy—for example, how to manage online identity and respectful interaction in online spaces.

Pupils should practice using AI ethically and safely in guided activities - learning not to rely on it but to question and verify. When previewing content generated from AI (e.g. collection of vocabulary, model texts, research prompts), teachers should always contextualise and evaluate it with pupils.

Pupil Use

We recognise that AI has many uses to help pupils learn. Pupils may use AI tools:

- As a research tool to help them find out about new 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. AI may also lend itself to cheating and plagiarism. To mitigate this, pupils may not use AI tools:

- To write presentations or where AI-generated text is presented as their own work
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations)

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 inappropriate or sexualised images of pupils
- Input offensive, discriminatory or inappropriate content as a prompt

A child-friendly version of these rules - which is shared with children before any use of AI within school - can be found in Appendix 3.

Assessment Integrity

At School, we ensure that assessment reflects pupils' own understanding and ability. While pupils in primary education are unlikely to use generative AI tools independently, staff will take reasonable steps to ensure that work used for assessment purposes represents the child's own learning. Where pupils produce work electronically (e.g. research projects, writing tasks), staff will support and supervise the process to ensure that AI tools are not used inappropriately.

In internal moderation (e.g. writing samples), staff may use AI tools such as ChatGPT to support professional judgement - but only with anonymised work, in line with data protection and intellectual property guidelines. All teacher-assessed judgements remain the professional responsibility of the teacher. We will continue to follow best practice guidance from the DfE and other professional sources regarding AI use in education.

Staff Training

All staff will receive appropriate training to ensure they understand how to use generative AI tools safely, responsibly, and effectively within the context of a primary school setting. Staff training forms part of our commitment to helping all staff build digital confidence, remain informed, and protect the wellbeing and privacy of pupils when engaging with emerging technologies.

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.

Breach of this Policy

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.

By Governors:

Governors found in breach of this policy will be subject to investigation by the Chair of Governors and/or the Headteacher, in line with the school's Code of Conduct for Governors.

Where necessary, this may include:

- A formal discussion and reminder of responsibilities
- Further training or guidance
- Referral to the Local Authority or Trust governance body for review
- In serious cases, consideration of removal from the governing body in line with statutory regulations and governance procedures

Breaches will be addressed in a proportionate and supportive manner, with the aim of upholding the integrity and ethical standards of governance at School.

By Pupils

Any breach of this policy by a pupil will be dealt with in line with our Behaviour Policy and Acceptable Use Policy.

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 Headteacher and DPO 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. All staff are responsible for ensuring that the policy is followed. The Headteacher, with the support of the Curriculum Lead for ICT and Computing, 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.

Links with other Policies:

This AI policy is linked to our:

- Data protection policy
- Data breach procedure
- Safeguarding/child protection policy
- Assessment for Learning policy
- Homework guidelines
- Behaviour policy
- Staff code of conduct
- Acceptable Use policy
- Online safety policy
- Equality scheme & accessibility plan

Appendix 1 – Approved AI tools

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
ChatGPT	• SLT •Teachers •Teaching Assistants • Governors • Admin	• Moderating anonymised pupil writing using photos (with chat history turned off) • Drafting emails, risk assessments, newsletters, policies, and reports (to be reviewed and approved by staff) • Research summaries and workload-reduction tasks (not for decision-making without review) • Support with reviewing curriculum documents and assessment task generation • Generating scaffolding ideas and resources for lessons • Generating retrieval questions or discussion prompts • Generating planning or stories / model texts for lessons or assemblies
Microsoft Copilot •	• SLT •Teachers	• Creating or formatting Word documents, slides or tables

	•Teaching Assistants • Governors • Admin	• Drafting newsletters, meeting minutes or summaries • Summarising lengthy documents (e.g. safeguarding updates) • Rewording or improving drafts e.g. emails professionally • Creating staff checklists or templates • Support with reviewing curriculum documents and assessment task generation • Generating scaffolding ideas and resources for lessons • Generating retrieval questions or discussion prompts • Generating planning or stories / model texts for lessons or assemblies
Please Note: • All uses must comply with the AI Policy and ensure Chat History is turned off (for tools like ChatGPT) to avoid data being used for training. • Any content generated remains the professional responsibility of the staff member using it. • AI should support, not replace, professional judgement.		

Appendix 2: Examples of personal, sensitive and identifiable data

Identifiable data refers to any information that can be used - on its own or in combination with other data - to identify a specific person. For example, this includes:

Direct identifiers:
• Full name
• Home address
• Email address
• Date of birth
• Phone number
• National Insurance number
• Pupil UPN (Unique Pupil Number)

Indirect identifiers (which may identify someone when combined with other information):
• A child's class and a unique feature (e.g., "the only Year 6 pupil who uses a wheelchair")
• IP addresses
• Photos or videos of an individual
• Voice recordings
• Specific behavioural, medical or safeguarding information

Special category data (which is even more sensitive under UK GDPR):
• Health or medical details
• Ethnic origin

• Religious beliefs
• SEND status
• Information about a child's home life (e.g., foster care status)

Appendix 3: Use of AI by Pupils

USING AI:
I can use AI:

- When a member of staff has approved my use of it for my schoolwork
- To help me carry out research
- To help me find information about topics that I'm learning about
- To help me find or create new ideas

I will not:

- Use AI to create my work or presentations for me
- Present AI work as my own work
- Use AI to complete work at home when it is presented as my own work
- Ask AI to answer my questions or do my calculations for me
- Use AI to make content so I can pretend to be another person
- Use AI to make content that is unkind to others
- Make or share inappropriate images or content
- Use inappropriate prompts