DOWNSVIEW PRIMARY SHOOL

Artificial Intelligence (AI) Policy

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1. Aims and scope

Here at Downsview Primary School we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools.

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).

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

1.1 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:

- Generative artificial intelligence (AI) in education, published by the Department for Education (DfE)
- Generative AI: product safety standards, published by the DfE
- How Ofsted looks at AI during inspection and regulation, published by Ofsted

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)
- Data (Use and Access) Act 2025

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

4. Roles and responsibilities

4.0 AI Lead

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.

4.1 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 Lead 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 school's Data Protection Team (School Business Manager and HR and Office Manager), Data Protection Officer (DPO), the school's AI Lead and the Designated Safeguarding Lead (DSL), 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
  - Fact-check results to make sure the information is accurate

4.2 Headteacher

The headteacher will:

- Liaise with the DPO to ensure that the use of AI is in accordance with data protection legislation
- Liaise with the Safeguarding Team to ensure that the use of AI is in accordance with Keeping Children Safe in Education (KCSIE) and the school's 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 use and potential risks of AI
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO and data protection impact assessments

4.3 Data Protection Officer (DPO)

The school's Data Protection Team (School Business Manager and HR and Officer Manager) manage data protection matters day to day. Should staff have any questions regarding AI and data protection implications then please contact either the School Business Manager and HR and Officer Manager, in the first instance. If required they will seek clarification from the DPO.

The DPO is responsible for advising on the school's compliance with data protection law, including in relation to the use of AI.

Our DPO is Judicium Consulting Ltd and is contactable using the following methods:

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB

Email: dataservices@judicium.com

Telephone: 0345 548 7000 option 1 then option 1 again

4.4 Designated safeguarding lead (DSL)

The DSL is responsible for monitoring and advising on the school's 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 Safeguarding Policy
- Understanding the filtering and monitoring systems and processes in place on school devices

The school's DSL is Meghan Pugh and is contactable via email at sec1@downsview.croydon.sch.uk

4.5 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 Data Protection Team/ DPO/ IT Consultant/ AI Lead, as appropriate
- Report safeguarding concerns to the DSL in line with our school's 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
- Fact-check results to make sure the information is accurate

All members of staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

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 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 does not mean it will always be appropriate.

The table in Appendix 1 lists the school's approved AI applications for use by staff, governors and pupils.

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 DPO and data protection impact assessments.

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, the school will treat this as a data breach and will follow the personal data breach procedure outlined in the school's Data Protection 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 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.

Exemptions to copyright are limited – the school will always seek legal advice if it is unsure as to whether it is acting within the law.

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.

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

The school will also regularly review its use of AI to identify and correct any biases that may arise.

If parents/carers 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 the school's usual complaints procedure. A copy of the school's Complaints Policy can be found on the school website.

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 the school's Safeguarding Policy.

5.7 Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Apply the principles set out in our school's Equality Statement 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

6. Educating pupils about AI

Here at Downsview Primary School 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.

Pupils are taught about the potential benefits of using AI tools including:

- Exploring ethical considerations around AI use and its impact on society
- Online safety to protect against harmful or misleading content

7. Staff training

The staff have received training as follows:

- Understanding AI and its uses at Downsview and the role it plays within this school.
- How safe internet use and online safeguarding may be affected by AI
- Who will be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI
- How the school will stay abreast of good practice and what mechanisms the school has in place for sharing it

8. 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 Safeguarding Policy and child protection referral process.

9. Breach of this policy

9.1 By staff

Breach of this policy by staff will be dealt with in line with the school's 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 the school 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

Staff members must report any breach of this policy, either by themselves or by another member of staff, to the headteacher immediately.

9.2 By governors

Breach of this policy by Governors will be dealt with in line with the Governing Board's adopted Code of Conduct.

10. 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 Lead 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.

The school's AI Lead will monitor the effectiveness of AI usage across the school.

The Headteacher will ensure that members of the school community are kept 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.

Appendix 1: Approved uses of AI tools

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

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
SLT AI	• Senior Leadership Team • School Business Manager • HR and Office Manager	• Letter writing • Policy writing
ChatGPT	• Teachers	• Problem solve • Research ideas for teaching and learning and operational matters
ChatGPT for Business	• SLT • Office Team	• ChatGPT can help save time and work better by streamlining daily tasks like communication and strategic planning • Offers a secure workspace which is excluded from AI training models • Summarising complex policies for internal use
Google Gemeni	• Teachers • Office Team	• Generating text for reading and writing • Make specific searches
Google AI Overview	• Staff • Pupils	• Obtaining summarised answers to a search query.
Teachmate AI	• Teachers	• Activity ideas generator for writing
Perchance AI	• Teachers	• Picture generation
KeyGPT	• Teachers • Governors • School Business Manager • HR and Office Manager	• Letters to parents/carers • Job descriptions and adverts