

West Street Community Primary School and Nursery



Artificial Intelligence Policy

Date policy last reviewed: 01/09/26

Date for review before: 01/09/27

1. INTRODUCTION

- 1.1 This is the Artificial Intelligence (AI) Policy of West Street Primary School. The purpose of this Policy is to ensure that appropriate controls are in place to maximise the educational and operational benefits offered by AI technologies, while implementing proportionate safeguards to manage legal, ethical, and
- 1.2 Park Primary recognises the significant opportunities that AI technologies present. When used safely, effectively, and with the right infrastructure in place, AI can support every child and young person — regardless of background — to achieve at school and college, and to develop the knowledge and skills they need for life. AI also has the potential to transform education by enabling teachers to focus more on teaching, rather than on tasks that divert attention from the classroom.
- 1.3 Guidance published by the Department for Education (DfE) identifies a range of potential benefits, including the use of AI for:
 - 1.3.1 creating educational resources
 - 1.3.2 lesson and curriculum planning
 - 1.3.3 tailored feedback and revision activities
 - 1.3.4 administrative tasks
 - 1.3.5 supporting personalised learning
- 1.4 The ability of AI to reduce non-teaching workload can help create more time for teachers to focus on delivering excellence in the classroom. However, the School also recognises that AI technologies are still evolving, which means that alongside these opportunities, there are risks that must be managed carefully to avoid unintended outcomes. These include:
 - 1.4.1 inaccurate or misleading information
 - 1.4.2 unsafe or inappropriate content
 - 1.4.3 biased or discriminatory outputs
 - 1.4.4 information taken out of context

1.4.5 outdated or unreliable sources

1.4.6 low-quality content

1.5 It is therefore critical that the School seeks to harness the benefits of AI while also meeting its wider legal obligations — including those relating to safeguarding, data protection, intellectual property, and equality.

2. ROLES AND RESPONSIBILITIES

The Governing Board

2.1 The Governing Board has overall responsibility for ensuring that the School fulfils its legal and ethical obligations in relation to the use of AI. It will oversee the development, implementation, and review of this Policy and ensure that effective systems of governance, oversight, and assurance are in place.

AI Lead- Headteacher (School Level)

2.2 The AI Lead is responsible for leading the School's strategic approach to AI, including:

2.2.1 coordinating the development and rollout of AI systems and training

2.2.2 maintaining the Register of Approved AI Tools (AI Register)

2.2.3 reviewing and approving AI use cases

2.2.4 ensuring consistency of practice across all teams within the school

2.2.5 liaising with SLT, Governors, the DPO, and IT Services to ensure AI use aligns with School priorities and compliance requirements

Data Protection Officer (DPO)

2.3 The DPO is responsible for ensuring that the School's use of AI complies with data protection law, including:

2.3.1 advising on the completion of Data Protection Impact Assessments (DPIAs) for all AI tools

- 2.3.2 reviewing proposals for the use of AI where personal data is involved
- 2.3.3 monitoring compliance with the UK GDPR and advising on the lawful use of data within AI systems
- 2.3.4 responding to incidents or data breaches involving AI

Senior Leadership Team

2.4 SLT are responsible for ensuring effective implementation of this Policy at school level. Their responsibilities include:

- 2.4.1 providing visible leadership on the responsible use of AI
- 2.4.2 ensuring local compliance with the School's AI Policy and associated procedures
- 2.4.3 monitoring the use of AI in classrooms and across school operations
- 2.4.4 reporting concerns or risks to the School's AI Lead or DPO as appropriate

All Staff

2.5 All staff are responsible for complying with this Policy and using AI in a safe, lawful, and ethical manner. This includes:

- 2.5.1 using only approved AI tools and consulting the AI Register before use
- 2.5.2 attending training and remaining up to date with expectations
- 2.5.3 ensuring that they apply professional judgment when using AI to support their role
- 2.5.4 reporting any misuse, unauthorised access, or data protection concerns promptly
- 2.5.5 using school-issued identities for AI accounts, with MFA where applicable

2.6 Further detail on staff responsibilities is provided in section 4.

3. AI GOVERNANCE AND TOOL APPROVAL

3.1 The school is committed to ensuring that AI is used in a way which is safe and legally compliant. To achieve this, it is essential that robust and consistent governance and oversight arrangements are in place across the school.

3.2 Central to oversight and governance is a requirement that no **AI tool or platform may be used** unless it has been formally reviewed and authorised. The School maintains a central AI Register, which records: -

3.2.1 the name and provider of the tool

3.2.2 whether the tool is classified as open or closed

3.2.3 confirmation that a **Data Protection Impact Assessment (DPIA)** has been completed

3.2.4 confirmation that the tool has been reviewed and approved by the School's IT provider

3.2.5 the purposes for which use has been approved

3.2.6 any restrictions on use (e.g. not for personal data, not for pupils)

3.3 It is the policy of the school that a Data Protection Impact Assessment (DPIA) will be carried out on all AI systems before they are approved and admitted to the approved register.

3.4 Staff must consult the AI Register before using any AI tool in their role. If a tool is not listed, it must not be used until formal approval has been granted.

3.5 Staff who wish to request approval of a new tool or propose a new use for an existing one must contact the AI Lead.

3.6 Final sign-off will rest with the AI Lead. Approved tools will be added to the AI Register and shared with staff. The school will issue periodic updates regarding newly approved tools, training needs and changes in permitted use; however, this does not override the responsibility of staff to consult the AI Register before using an AI system.

4. Use by Staff

4.1 All staff are expected to use AI in accordance with this Policy and the systems established by the school. Before using any AI system, staff must:

- 4.1.1 consult the AI Register
- 4.1.2 confirm that the AI tool is listed and approved for the intended use
- 4.1.3 familiarise themselves with the permitted uses and any restrictions recorded in the AI Register
- 4.1.4 seek clarification from the AI Lead where there is any doubt about the approval status, scope of use, or limitations.
- 4.1.5 submit a request to the AI Lead for approval if a tool is not currently listed in the AI Register.

4.2 In terms of expected professional standards and behaviours, staff are expected to:

- 4.2.1 attend training provided by the school
- 4.2.2 understand that AI is a support tool designed to enhance teaching and delivery but is never a substitute for professional judgement.
- 4.2.3 understand that the quality and content of any final material(s) remains their responsibility.
- 4.2.4 remain responsible and accountable for the accuracy, appropriateness and quality of any AI-generated material they use or adapt, including in contexts such as:
 - 4.2.4.1 creating or adapting educational resources
 - 4.2.4.2 planning lessons or curriculum content
 - 4.2.4.3 drafting tailored feedback or revision materials
 - 4.2.4.4 supporting administrative tasks such as report writing or meeting preparation
 - 4.2.4.5 Minute taking in meetings

4.3 Staff must not use AI systems:

- 4.3.1 to make decisions that carry significant consequences for pupils or staff (e.g. safeguarding, behaviour, performance, SEND)
- 4.3.2 to assess subjective work without applying their own professional judgment
- 4.3.3 to impersonate others or present AI-generated work as wholly human-authored
- 4.3.4 for any purpose that is unlawful, misleading or outside the scope of approved use

4.4 Staff are expected to uphold all relevant legal and regulatory standards when using AI, including:

- 4.4.1 data protection and UK GDPR
- 4.4.2 copyright and intellectual property rights
- 4.4.3 equality legislation
- 4.4.4 duties under Keeping Children Safe in Education

5. Use of AI by Pupils

5.1 The School is committed to providing pupils with the knowledge and skills that they need to use AI in a way that is safe, responsible and ethical. This will include providing age appropriate guidance on:

- 5.1.1 the opportunities and risks associated with AI
- 5.1.2 how to use AI in a way that supports learning
- 5.1.3 the importance of academic integrity and originality
- 5.1.4 respecting others and behaving responsibly

5.2 Pupils are expected to use AI tools in accordance with this Policy, and under the supervision and direction of staff. The following rules apply:

- 5.2.1 pupils must only use AI tools that have been explicitly authorised for their use by the school
- 5.2.2 pupils must only access AI tools under supervision

- 5.2.3 pupils must not attempt to bypass restrictions or use AI tools in unauthorised ways or on unapproved platforms
- 5.2.4 pupils must not use AI in any way that contravenes other school policies, such as the Online Safety
- 5.2.5 to upload photos of children or staff.

5.3 AI must only be used for educational purposes that align with classroom tasks or activities set by a member of staff. This may include:

- 5.3.1 generating writing prompts or exploring creative ideas
- 5.3.2 receiving feedback or suggestions on written work
- 5.3.3 practising spelling, grammar or vocabulary activities
- 5.3.4 exploring specific questions with teacher supervision.

5.4 Pupils must not use AI tools:

- 5.4.1 to complete assessments or homework dishonestly, (i.e. cheating or plagiarism)
- 5.4.2 to generate or share offensive, discriminatory, harmful, or inappropriate content
- 5.4.3 to spread misinformation or impersonate others
- 5.4.4 to access, share or produce material unrelated to their learning
- 5.4.5 to store or share data about other pupils or staff

5.5 Pupils are expected to behave responsibly when using AI and to report any concerns, risks or inappropriate use to a member of staff immediately.

5.6 As with all digital activity, the use of AI by pupils is subject to the school's wider Positive Behaviour Policy and online safety policy.

6. Staff Training

The School will ensure that all staff receive appropriate training on the safe, ethical and lawful use of AI technologies. This includes an understanding of this policy, the AI Register and acceptable use.

7. Raising concerns

7.1 All users of AI within the school are expected to act in accordance with this Policy and raise concerns where appropriate.

7.1.1 If a member of staff becomes aware of any inappropriate, unsafe, unlawful or unauthorised use of AI, this must be reported promptly to the AI Lead or DSL.

7.1.2 Pupils are encouraged to report any concerns about AI use — including exposure to inappropriate content, misuse by other pupils, or technical issues — to a member of staff without delay.

8. Breach of Policy by Staff

8.1 Any breach of this Policy by staff may lead to action under the School's Staff Code of Conduct and Disciplinary Policy. This includes (but is not limited to) using non-approved AI tools, failing to apply professional judgment, or misusing AI in a way that undermines the safe use objectives of this Policy.

8.2 Pupil misuse of AI may result in disciplinary action in accordance with the Behaviour Policy.

9. AI Risk Register

AI Use Case	Description of Risk	Data Type Affected	Likelihood	Impact	Existing Controls	Further Mitigations	Residual Risk
<i>Public AI tools</i>	Personal or sensitive pupil data entered into public AI platforms	Pupil personal data	Medium	High	Staff guidance; policy controls	Training and monitoring	Low
<i>Copilot use</i>	Misuse of pupil data despite secure environment	Pupil personal data	Low	High	Secure tenant; MFA	Permission audits	Low

<i>Pupil exposure</i>	Inappropriate or harmful AI-generated content	Safeguarding	Medium	High	Staff review before use	Filtering and DSL oversight	Low
<i>Accuracy</i>	Unverified or incorrect AI output used	Educational integrity	Medium	Medium	Professional judgement required	Curriculum review	Low
<i>Bias</i>	Discriminatory or biased outputs	Equality data	Low	High	Human review	Awareness training	Low
<i>Unapproved tools</i>	Use of unapproved AI platforms	All data	Medium	High	Approved tools list	Annual review	Low

10. Approved AI Platforms and Controls

Tool Name	Provider	Purpose	Approved Data	Key Risks	Restrictions	DPIA	Approval
Microsoft Copilot (Edu)	Microsoft	Planning and admin support	Pupil data allowed	Misuse of data	School accounts only	Yes	DPO
SLT AI	Craig McKee	Teaching support	As per DPA	Third-party processing	Vendor agreement	Yes	DPO
ChatGPT	OpenAI	Idea generation	Generic only	Data leakage	No personal data	Yes	DPO
Google AI	Google	Research support	Generic only	Data retention	Generic prompts only	Yes	DPO
Canva AI	Canva	Design support	Generic only	Metadata exposure	No pupil images entered directly into AI section	Yes	DPO

11. Individual DPIA for AI Platforms

Microsoft Copilot (Education Tenant)

Purpose of processing: Staff productivity, lesson planning, summarising information, drafting communications.

Categories of data processed: Identifiable pupil data and staff data (within secure tenant only).

Lawful basis: Public task – Article 6(1)(e).

Identified risks: Potential misuse of personal data or over-reliance on AI outputs.

Risk mitigation and controls: Access restricted to school accounts; MFA enabled; training provided.

Residual risk level: Low after mitigation.

SLT AI

Purpose of processing: Curriculum planning and teaching support.

Categories of data processed: Limited pupil data as permitted by supplier agreement.

Lawful basis: Public task – Article 6(1)(e).

Identified risks: Third-party data processing risks.

Risk mitigation and controls: Supplier DPA in place; approved use only.

Residual risk level: Low.

ChatGPT

Purpose of processing: Idea generation, drafting, generic research.

Categories of data processed: No personal data permitted.

Lawful basis: Public task – Article 6(1)(e).

Identified risks: Data leakage if misused.

Risk mitigation and controls: Strict staff guidance; generic use only.

Residual risk level: Low.

Google AI (Gemini)

Purpose of processing: Summarisation and research support.

Categories of data processed: No personal data permitted.

Lawful basis: Public task – Article 6(1)(e).

Identified risks: Unclear retention policies.

Risk mitigation and controls: Generic prompts only; staff training.

Residual risk level: Low.

Canva AI

Purpose of processing: Creation of visual resources.

Categories of data processed: No pupil images or names permitted.

Lawful basis: Public task – Article 6(1)(e).

Identified risks: Metadata exposure if misused.

Risk mitigation and controls: Generic designs only; review before use.

Residual risk level: Low.

Please read in conjunction with:

Acceptable Use Policy

Safeguarding and CP Policy

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