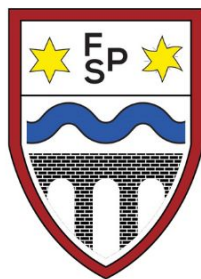




FENISCOWLES PRIMARY SCHOOL
'STRIVING FOR EXCELLENCE'



ARTIFICIAL INTELLIGENCE POLICY

Policy date : November 2025

Written and reviewed by : Rob Andrew November 2025.

Nominated Governor: Catherine Woodhouse (Safeguarding Governor)

Renewal schedule : Annually

This policy supports, but does not replace, human leadership or statutory duty.

1. Introduction

Artificial Intelligence (AI) is an evolving technology with growing applications in primary education. At Feniscowles Primary School, AI is used exclusively by staff to support administrative efficiency, teaching innovation, and workload reduction. This policy sets out clear expectations for AI use, aligned with the DfE (2025) guidance, KCSIE (2024), UK GDPR, and Education Data Hub v1.2 standards.

We commit to:

- Embedding AI within a safe, ethical, and transparent culture
- Maintaining human oversight in all decision-making
- Protecting pupil data and upholding intellectual property rights
- Aligning AI use with our school values of inclusion, respect, integrity and safety

What this means in practice: AI tools are used to support (not replace) teaching, learning and administrative work. For example, AI may help generate quiz questions or draft a newsletter, but staff remain fully responsible for the content and decisions.

2. Scope and Application

This policy applies to:

- All staff (teaching, administrative, leadership)
- Governors and contractors
- Pupils indirectly (via safeguarding, data protection, and digital literacy)

Important Note: Pupils must not directly use AI systems unless under strict teacher supervision, within a closed, school-approved system, and with safeguarding and data protection controls in place. This applies only to age-appropriate, curriculum-linked tasks within the primary phase.

ChatGPT and Age Limits: OpenAI's ChatGPT and many other generative AI tools are designed for users aged 13 and over. As such, no pupil should access or interact with these platforms unless under direct staff supervision within an age-appropriate, school-controlled environment, and for specific curriculum purposes only.

3. Strategic Aims of AI Use

We aim to use AI to:

- Enhance primary teaching and learning through resource creation, story prompts, and revision activities
- Improve operational efficiency, such as drafting newsletters, preparing trip letters, and compiling bulletins
- Support differentiation and SEND provision (e.g. adjusting reading level of texts)
- Reduce teacher workload, giving staff more time to focus on pupil interaction and classroom instruction
- Promote digital literacy among staff, enabling confident and critical use of emerging tools
- Support lawful and ethical processing of personal data for tasks related to SEND, assessment, and administrative functions within a primary school context

Example: A Year 4 teacher may use ChatGPT Team to create a differentiated reading comprehension for a class story, then adapt it to suit different reading ages.

4. Governance and Oversight

- **Headteacher:** Manages the ChatGPT Team workspace, sets permissions by role, ensures only authorised staff access AI tools, and ensures no public AI tools (like free accounts) are used with school data. The Headteacher is also responsible for ensuring that AI use is included in the termly Headteacher's report to the Full Governing Body (FGB), with clear summaries of usage trends, CPD compliance, DPIA reviews, and any safeguarding incidents related to AI.
- **Data Protection Officer (DPO):** Advises on lawful data use and ensures a Data Protection Impact Assessment (DPIA) is completed before any AI tool is introduced or used for identifiable data.
- **IT Lead:** Maintains security controls, verifies that AI tools meet DfE product safety expectations, and ensures filtering and monitoring are in place.
- **Governors:** Receive formal termly updates via the Headteacher's report to FGB and participate in annual policy review. They monitor CPD records, DPIA logs, and risk registers to support strategic oversight.
- **AI Lead (appointed from SLT):** Coordinates staff training, supports DPIA completion, logs examples of AI use, and ensures safe, pedagogically aligned practice. The AI Lead provides updates to SLT that feed into the Headteacher's report cycle.

5. AI Use by Staff

Staff use is based on **role-based permissions** within a secure, school-controlled subscription (e.g. ChatGPT Team). This ensures: Staff use is based on **role-based permissions** within a secure, school-controlled subscription (e.g. ChatGPT Team). This ensures:

- **SLT:** May use AI with identifiable data (e.g. pupil initials, safeguarding summaries) inside ChatGPT Team. All such use must be logged in a DPIA.
- **Teachers:** Can use AI for lesson planning, marking support, scaffolded resources—**but only with anonymised data** (e.g. “a Year 1 pupil working on phonics blending” rather than naming the child).
- **Administrative staff:** Can use AI for creating newsletters, trip letters, event posters—**but must not input personal or sensitive information.**

AI may also support regular data processing tasks, such as:

- **SEND planning** (e.g. summarising anonymised EHCP strategies or speech and language reports)
- **Assessment support** (e.g. spotting trends in anonymised end-of-unit test data)
- **Administrative functions** (e.g. summarising policies, generating newsletter content)

All AI-generated outputs must be reviewed and edited by the staff member before use.

AI may also be used to support accurate and timely record-keeping through the use of audio recordings for meeting minutes (e.g. safeguarding meetings, SEND reviews), provided that:

- All individuals involved have been informed and consent has been recorded
- The AI summarisation is completed within a secure, closed system such as ChatGPT Team
- The audio recording is deleted once transcription/minutes are verified
- A DPIA is completed and stored prior to initiating any AI-driven recording or summarisation process

6. Data Protection and DPIAs

To protect personal data and comply with GDPR:

- AI must never be used to process names, health data, EHCP content, or behaviour logs unless:
 - It is processed within ChatGPT Team or another secure, non-training tool
 - A DPIA has been completed and approved by the DPO

When is a DPIA required?

- When uploading any data that can identify a person (e.g. pupil reports, 1:1 support logs)
- When an AI tool is used to analyse or profile pupil progress or vulnerabilities
- When the tool is not pre-approved by the SLT or DPO

DPIAs also apply when staff sign up for accounts requiring name/email, especially where tools store prompts.

7. Safeguarding, Filtering and Monitoring

In line with KCSIE (2025) and DfE Filtering and Monitoring Standards:

- All AI tools must operate within the school's secure filtering system
- Free AI tools or personal accounts must not be used for school-related work
- Pupils must never be shown AI-generated images or videos unless pre-screened by staff
- Any suspected misuse (e.g. AI-generated impersonations or inappropriate content) must be escalated to the DSL immediately

Example: If an AI tool suggests content that includes stereotyped or biased examples (e.g. gender bias in role models), staff must not use it and should report it for retraining.

8. Academic Integrity and Pupil Work

- Pupils must not use AI to complete homework or classwork unless explicitly permitted by staff
- Staff will ensure that any use of AI in pupil projects is disclosed, age-appropriate, and supports understanding rather than replacing learning
- AI tools may assist pupils in formative tasks (e.g. improving a piece of writing with adult support), but not in assessed outcomes

Teacher Tip: In upper Key Stage 2, discuss with pupils how to critically evaluate suggestions made by AI tools and how to check for factual accuracy.

9. Training and Professional Development

- **All staff:** Receive annual refresher on AI policy, safe prompting, and data security
- **SLT and AI Lead:** Receive specific training on DPIA, role-based permissions, and advanced safeguarding issues (e.g. impersonation risks)
- **New staff:** Trained at induction, including appropriate use of ChatGPT Team and what data must never be input

Training is logged and monitored by SLT and reviewed by governors.

10. Copyright and Intellectual Property

- Staff must ensure that AI tools are not used to copy, recreate, or adapt materials in ways that breach copyright laws, such as reproducing published textbooks or scheme-based resources.
- Any AI-generated content must be reviewed for originality. Content intended for public sharing (e.g. school website or newsletters) must only be used where the output does not replicate or infringe copyrighted material.

- Staff must not upload or use copyrighted pupil work, curriculum content, or third-party resources in AI tools unless:
 - The material is anonymised, and
 - The school holds the appropriate licence, **or written permission has been obtained.**
- A **permission log** must be maintained by the SLT or AI Lead to document any approvals relating to copyrighted uploads or external sharing of AI-generated materials.

Reminder: All staff must comply with the Copyright, Designs and Patents Act 1988.

11. Monitoring, Review and Enforcement

- SLT conduct a termly audit of how AI is being used across primary teaching and operations
- Any breaches (e.g. personal data use in public tools) are escalated as a conduct issue
- Policy is reviewed annually or sooner if DfE guidance is updated

Appendices

A. Approved AI Tools List (e.g. ChatGPT Team with admin-managed retention settings)

B. AI DPIA Log Template (showing which tools are used, data types, risks)

C. AI Guidance References Summary

Appendix A

Approved AI Tools List

The following tools are approved for use in line with this policy and must be used within the boundaries of role-based permissions, data protection, and safeguarding frameworks. All use must be clearly attributed and documented where required.

School-Led Resources:

- **ChatGPT (Free and Premium)** – Available to all staff for general planning, resource development, and administrative support using non-identifiable data.
- **ChatGPT (TEAM Subscription)** – Restricted to SLT and SENCO for secure use involving sensitive or identifiable data. Subject to DPIA and data controls.
- **PlaudAI** – Approved for all staff for summarising meetings and generating transcripts. Use of recordings must follow consent and DPIA protocols.
- **Gamma** – Approved for all staff. Used for professional presentation generation, planning summaries, and meeting notes.
- **SLTAI** – Access for SLT and SENCO to support strategic planning, safeguarding oversight, and SEND leadership workflows.
- **Make.com** – Approved for Headteacher only for use in automation and administrative task streamlining. Use must be covered by a DPIA and referenced in governance updates.

Discretionary Tools:

Staff may use other AI tools or personal subscriptions only if:

- Use aligns with this policy
- No identifiable or sensitive data is input unless a DPIA is completed
- Use is logged with the school's AI Co-ordinator for transparency and audit

Note: Any tool not listed above must not be used with identifiable data without prior approval from SLT and DPO.

Appendix B

AI DPIAs in Place

To ensure that AI tools are implemented safely and in compliance with UK GDPR and safeguarding frameworks, the following tools have Data Protection Impact Assessments (DPIAs) formally in place:

AI Tool	Purpose	DPIA Owner	Access Level	Last Reviewed
ChatGPT TEAM	Secure staff use with identifiable data for SEND, safeguarding	DPO/Head	SLT, SENCO	Nov 2024
PlaudAI	Transcription and minute generation from audio recordings	DPO/Head	All Staff (with consent)	Nov 2024
Make.com	Automation of school admin workflows	Headteacher/DPO	Headteacher only	Nov 2024

All DPIAs are:

- Logged centrally with the Data Protection Officer (DPO)
- Reviewed annually and upon any significant changes to tool usage
- Shared with governors upon request via the Headteacher's termly report

Appendix C

AI Guidance References for Schools (2025)

This one-page briefing provides a staff and governor-friendly summary of the key documents that inform Feniscowles Primary School's AI Policy. These resources offer clear standards for safe, lawful, and effective use of AI in the primary education context.

1. DfE (2025): Generative AI in Education – Guidance & Toolkit

- Modules 1–4 outline how AI can be used responsibly in schools
- Includes training guidance, legal expectations, and classroom use cases
- Supports workload reduction, curriculum planning, and safeguarding awareness

2. Education Data Hub (v1.2): AI Policy Guidance for Schools

- Offers model structures for AI policies and DPIA advice
- Stresses governance, staff training, and filtering/monitoring compliance
- Aligns with UK GDPR and DfE risk frameworks

3. KCSIE (2024): Keeping Children Safe in Education

- Clarifies AI as part of the wider digital safeguarding framework
- Emphasises filtering, monitoring, and misuse escalation
- Relevant for DSLs and all staff when using technology around pupils

4. ICO (2024): AI and Data Protection Risk Toolkit

- Details lawful basis, data minimisation, and human oversight
- Provides checklists and thresholds for DPIAs
- Especially relevant when using tools like ChatGPT with pupil data

5. UK GDPR & Data Protection Act 2018

- Core legislation for handling personal data in education
- AI use must comply with consent, legal basis, and data rights
- All staff should follow school privacy notices and DPIA triggers

This document is reviewed annually by the AI Co-ordinator and DPO. Full versions of all reference documents are available upon request.