Use of artificial intelligence (AI) policy

Two Waters Primary School

Approved by:

Name	Position	Signature	Date
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1. Aims and scope

Here at Two Waters Primary 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 (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:

- 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)

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

4.0 AI lead and associated roles

AI Lead: Annalisa Hunter, Deputy Headteacher. She is responsible for the day-to-day leadership, ownership and management of AI use in the school.

Internal Data Protection Lead / Deputy Data Protection Officer: Tim Gately, Headteacher

Independent Data Protection Officer: Richard Maskrey, Managing Director, School Consulting Ltd

Data Controller: The School

4.1 Governing board

The governing board will:

- Take overall responsibility for monitoring this policy and holding the school to account for its implementation in line with the school's AI strategy
- 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 section 5)
    - Seek advice from the AI 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 generative AI tools
    - Fact-check results to make sure the information is accurate
    - Acknowledge or reference the use of significant generative AI in their work e.g. where AI produces substantial sections of a document, creates resources, generates analysis or produces images by including a simple footnote on the relevant document ("AI has been used to prepare this document, including the development of content and suggestions for structure. All content has been reviewed and verified by the Governing Board. Responsibility for the final document rests with the Governing Board").

4.2 AI Lead (Deputy Headteacher)

The deputy headteacher will:

- Take responsibility for the day-to-day leadership and management of AI use in the school
- Ensure that the use of AI is in accordance with data protection legislation
- 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 and data protection impact assessments

4.3 Internal Data Protection Officer (Headteacher)

The internal data protection officer (Headteacher) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.
Our Internal DPO is Tim Gately, Headteacher and is contactable via the school office.

4.4 Safeguarding lead

The safeguarding lead 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)

NOTE: Pupils are not permitted to access external AI software at Two Waters Primary School.

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)
- Seek advice from the data protection officer / AI 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 where the contribution is substantial e.g. where AI produces substantial sections of a document, creates resources, generates analysis or produces images by including a footnote on the relevant document (“AI has been used to prepare this document, including the development of content and suggestions for structure. All content has been reviewed and verified by the School. Responsibility for the final document rests with the School”).
- 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.

4.6 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, where AI has made a substantial contribution should be clearly attributed (via a footnote that states:

"AI has been used to prepare this document, including the development of content and suggestions for structure. All content has been reviewed and verified by the School / Governing Board (delete as appropriate). Responsibility for the final document rests with the School / Governing Board (delete as appropriate").

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.

Approved tools	Approved uses
ChatGPT (closed AI tool)	• General administration • Letters to parents/carers • Job descriptions and adverts • Interview questions • Lesson planning • Report Writing • Pupil assessments • Strategy and operational documents NOTE: Staff may use AI tools to assist with report writing and assessment formatting etc, provided they do not input any personal, sensitive, or identifying data about pupils or the school.
Claude (closed AI tool)	• General administration • Letters to parents/carers • Job descriptions and adverts • Interview questions • Lesson planning • Report Writing • Pupil assessments • Strategy and operational documents NOTE: Staff may use AI tools to assist with report writing and assessment formatting etc, provided they do not input any personal, sensitive, or identifying data about pupils or the school.
Google AI (closed AI tool)	• General administration • Letters to parents/carers • Job descriptions and adverts • Interview questions • Lesson planning • Report Writing • Pupil assessments • Strategy and operational documents NOTE: Staff may use AI tools to assist with report writing and assessment formatting etc, provided they do not input any personal, sensitive, or identifying data about pupils or the school.

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 deputy headteacher (AI Lead) to discuss any ideas they may have with regards to using AI, so the deputy headteacher can take the suggestions forward if they deem it to be a satisfactory new method of working.
The deputy headteacher is responsible for signing off on approved uses of AI, or new AI tools and data protection impact assessments, along with the Internal DPO (headteacher).

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 generative AI tools or chatbots.
If personal and/or sensitive data is entered into an unauthorised generative AI tool, Two Waters Primary School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy (available on our website). 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.
Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race and disability. This means that critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output before relying on it.
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 as a consequence of AI use, these will be dealt with through our usual complaints procedure (available on our 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.

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 (available on our website) 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
- Input any personal and sensitive data about pupils, employees, governors

6. Educating pupils about AI

At Two Waters 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. Through our Computing curriculum (delivered via Purple Mash), Information Technology, Computer Science and Digital Literacy are taught. All years from 1 to 6 are taught online safety via the modules 'Being safe in a digital world'. AI is explicitly introduced into the curriculum in Year 4 through the unit 'Introduction to AI' which includes:

- Understanding what Artificial Intelligence is and some of the tasks it can carry out
- Learning how to communicate effectively with AI tools by writing clear and precise prompts
- Understanding how to be a good digital citizen when using AI
- Thinking about how AI might develop in the future

Two Waters pupils do not access unrestricted external AI models. Instead, 'Purple Mash' (computer scheme) uses safe, age-appropriate simulations and teacher-led demonstrations to teach AI concepts without exposing pupils to unrestricted external AI models.

7. Use of AI by pupils

Pupils at Two Waters are not permitted to use external AI models within school.
If AI is used to support or complete homework (e.g. as a research tool to help them find out about new topics and ideas), all AI-generated content must be attributed (by adding a written note to the homework) and appropriate for the pupils' age and educational needs.

Pupils, with support from their parents / carers, 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 explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

We will take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.
We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments.

9. Staff training

An annual refresher training during a staff meeting will be used to remind teachers of approved AI tools and to share best practice. Staff will sign a declaration to say that they have read this policy and attended training and understood how to safely and effectively use AI.

10. Breach of this policy

10.1 By staff and governors

Breach of this policy by staff will be dealt with in line with our code of conduct (see school website).
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 and governors 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 or governor, 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 (available on our school website).

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 deputy headteacher, 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 staff are expected to read and follow this policy. The deputy headteacher is responsible for ensuring that the policy is followed.

The deputy headteacher will monitor the effectiveness of AI usage across the school.

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Behaviour policy
- Staff code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy