Artificial intelligence (AI) policy

Status: [approved / draft] · Approved by [approving body] on [approval date] · Next review [next review date]

§ 1 Purpose and scope

This policy sets out how artificial intelligence (AI) may be used at [School name]: what is permitted, what is not, and who decides. It exists so that AI is used with confidence, inside clear lines, and so that the school can show how it manages the risks.

It applies to everyone who uses school systems, works with our pupils or acts for the school: staff (including supply and agency staff), governors and trustees, volunteers, contractors and trainees.

It works alongside our child protection, online safety, acceptable use, data protection and behaviour policies and the staff code of conduct, and does not replace any of them.

§ 2 What we mean by AI

In this policy, generative AI means software that produces or changes text, images, audio or code in response to a request, such as chatbots and the assistants now built into office, search and school software. AI also covers software that scores, ranks or flags people or their work automatically, and software that carries out tasks for its user, such as sending messages.

AI features added to software we already use count as new tools in their own right.

§ 3 Roles and responsibilities

The governing body holds overall accountability for this policy and receives a one-page report on AI each term.

The headteacher is responsible for how the policy works in practice and delegates its day-to-day running to the deputy headteacher.

The deputy headteacher keeps the Approved Tools Register up to date and prepares the termly report to governors. New AI tools are approved by [approving role] on the advice of the data protection officer.

The data protection officer advises on data protection and reviews every data protection impact assessment. The designated safeguarding lead is the first contact for any safeguarding concern involving AI.

The exams officer is the first contact for any concern about AI in assessed work.

Every member of staff follows the rules in section 5 and reports concerns as section 11 sets out.

§ 4 Our position on AI

We are piloting a small number of approved AI tools with named staff, and we review what we learn each term before deciding what to adopt.

We use AI where it saves time or improves learning, and never where it would put a pupil's data, safety or work at risk.

Nobody is required to use AI, but everyone who does follows this policy. This position is reviewed as set out in section 13.

§ 5 Staff use

Staff may use generative AI tools for professional tasks provided the four core rules below are always followed. Tools on the Approved Tools Register are the school's supported route and the default choice. A tool not on the register may be used only for work involving no personal data and no confidential school information, and staff are encouraged to propose useful tools for the register so they can be supported properly.

5.1 Nothing that identifies a pupil, parent or colleague is entered into any tool not approved for that purpose: no names, images, safeguarding, SEND, medical, attendance or assessment information.

5.2 Every AI output is checked by a member of staff before it is used, sent or taught. The member of staff remains the author and remains accountable.

5.3 School accounts are used on approved tools. Personal accounts are not used for school work.

5.4 AI use is acknowledged in public-facing materials and wherever a reader would reasonably expect to know.

Where the value of a piece of work is that a person wrote it, such as a reference or a letter to a family at a difficult time, it is written by a person, not drafted with AI.

Nobody signs the school up to an AI tool or service, or switches on an AI feature for other people, without approval under section 7. Free tools and free trials count.

§ 6 Pupil use

Pupils may use generative AI tools at school only in lessons where the teacher has planned that use, only through school systems, and only using tools on the register approved for pupil use. Pupils are taught to say when and how AI has helped with a piece of work, and work presented as the pupil's own must be the pupil's own.

For each homework or independent task, the teacher says whether AI may be used and, if it may, how to acknowledge it. Where the teacher has not said, AI may not be used.

No pupil is asked to use an AI tool below the minimum age set in its provider's terms, and a tool is approved for pupil use only for the ages those terms allow.

Tasks are set so that a pupil without AI at home is not at a disadvantage.

Pupils are taught what AI tools are, what they get wrong, how to acknowledge their use and who to tell when something online worries them. Relationships, sex and health education (RSHE) also teaches them how AI chatbots can create fake intimacy or give harmful advice, and how deepfakes can be used to cause harm and how to spot them. It makes clear that keeping or sharing a sexual image of anyone under 18 is a crime, even if AI made it.

Misuse of AI by a pupil is dealt with under the behaviour policy. If it involves content about another person, such as a fake image, it is also a safeguarding matter under section 10.

Examined and assessed work follows the stricter rules in section 9 and the exam malpractice policy.

§ 7 Approved Tools Register

The Approved Tools Register, Appendix A to this policy, lists each approved AI tool, who may use it, for what, with which data, and when it is next reviewed. An AI feature switched on in software we already use goes through the same approval as a new tool.

The AI features within our Microsoft 365 agreement are the first tools considered for approval, because they should fall under a data processing agreement the school already holds. The data protection officer confirms that they do before they are approved.

Before a tool is approved, our vendor questions are answered in writing, by the supplier or from its published terms, including whether our data is used to train its models. The tool is checked against the product safety standards for generative AI published by the Department for Education (DfE), and against the part of the DfE's "Data protection in schools" guidance on procuring edtech. A tool that will process personal data also needs a data protection impact assessment, as section 8 sets out.

Anyone may propose a tool to the deputy headteacher at any time. The decision and the reason for it are recorded in the register, including when a tool is declined.

The register is kept where every member of staff can read it: [register location]. The deputy headteacher reads it through each term, and each entry has its own review date.

§ 8 Personal data and AI

Personal data is entered only into an AI tool whose register entry allows that kind of data, and then only as much as the task needs. The school's data protection policy applies in full.

Any tool that will process personal data is assessed under our existing data protection impact assessment process before it is approved.

Each assessment is completed by the person proposing the tool, with the data protection officer advising, and is looked at again whenever the tool, its terms or the way we use it changes.

No decision with a legal or similarly significant effect on a pupil or a member of staff, such as an exclusion, a mark for assessed work or a job application, is made by an AI tool

without meaningful human involvement. A person weighs the matter and takes the decision; they do not simply accept what a tool suggests.

Suppliers may not use personal data to train or improve their AI models. They may use pupils' work for that purpose only with personal details removed and with permission from the pupil, or from a parent or carer where the pupil is too young to give it; staff work needs the school's agreement.

Our privacy notices say which AI tools process personal data, and what for.

§ 9 AI and assessments

This school is an approved examination centre, and awarding body rules made through the Joint Council for Qualifications (JCQ) apply to all examined and internally assessed work. Where this policy and those rules differ for assessed work, the JCQ rules prevail.

Work a candidate submits must be their own. Permitted AI use is acknowledged in the way JCQ requires, and misuse of AI in assessed work is malpractice, handled under the exam malpractice policy, which covers AI as JCQ requires.

Each year, before any assessed work begins, candidates are briefed on the rules for AI and given the JCQ information for candidates on AI.

An AI detection score is never the only evidence for a malpractice decision. All the available evidence is considered, including drafts and the work the teacher has seen the candidate produce, as JCQ requires.

AI is never the sole or main means of marking candidates' work. Teachers review all of the work and decide the mark themselves, whatever an AI tool suggests.

Where a candidate uses a word processor or other device in an examination, AI tools and internet access are turned off, as JCQ requires, and the set-up is tested beforehand.

Where a specification requires assessed work to be done under formal supervision over several sessions, the work is collected and stored securely at the end of each session, in line with JCQ rules.

§ 10 Safeguarding, filtering and monitoring

AI-related harm is a safeguarding matter, handled under the child protection policy. That includes deepfakes and other AI-generated or altered images of pupils or staff, images made with nudification apps, and bullying carried out with AI. It is reported to the designated safeguarding lead the same day, not to IT.

Staff do not look for, copy, forward or save such an image, even to keep it as evidence. They report it, and the designated safeguarding lead decides what happens next.

Fake intimate images of staff are handled with the same urgency. Creating or requesting one without consent is a criminal offence, and the member of staff affected is supported throughout.

AI chatbots and companion apps can create a false sense of friendship or give harmful advice. A concern that a pupil is being drawn in by one is treated like any other concern about risky contact online, and goes to the designated safeguarding lead.

Filtering and monitoring are reviewed at least once every academic year, and whenever a new AI tool is introduced. The review is led by the senior leader responsible for filtering and monitoring, with the designated safeguarding lead and IT support. Its results are recorded and shared with the governor responsible for filtering and monitoring.

The review checks how our filtering and monitoring handle AI tools and AI-generated content. Anything they cannot see is recorded as a finding, with what we do instead, such as limiting which tools pupils can reach, supervision and teaching.

Action: the deputy headteacher will obtain written confirmation from our filtering and monitoring provider of how its product handles AI tools and AI-generated content by [date for the provider's answer], and record the answer in the annual review.

§ 11 Incidents and concerns

Anyone with a concern about AI reports it the same day: data concerns, such as personal data entered into an unapproved tool, to the data protection officer; safeguarding concerns to the designated safeguarding lead; concerns about assessed work to the exams officer; and anything else to the deputy headteacher.

Data incidents follow the data breach procedure; safeguarding concerns follow the child protection policy.

Honest, early reporting is expected and supported, including when someone reports their own mistake.

§ 12 Training

All staff, including those who choose not to use AI, are trained on this policy when they join, and again each year once the new edition of Keeping children safe in education (KCSIE) is in force. A record of the training is kept.

The training covers the four rules, the register and how to propose a tool, how to recognise and report AI-related harm, and, for staff involved in assessed work, the JCQ rules on AI.

Staff may use the DfE's free "Using AI in education settings" materials for the basics; our own training covers our rules and our tools.

§ 13 Review, ownership and version history

The deputy headteacher reviews this policy every six months.

This policy is also reviewed sooner if any of these happens: a new edition of KCSIE comes into force; JCQ publishes its rules for a new academic year; the DfE or the ICO changes its guidance on AI or data protection; a tool is added to or removed from the register; the school changes platform; or an incident shows the policy needs to change.

Each version of this policy is recorded below.

Version	Date	What changed	Approved by
1.0	[approval date]	First version, built from clause library v1.0	[approving body]

Appendix A: Approved Tools Register

The live register is kept by the deputy headteacher at [register location]. It starts from the rows below. A tool is approved only once the checks in section 7 are complete, and the full register also records any conditions, the data protection impact assessment and the next review date.

Tool	Who may use it	Approved for	Personal data allowed
Copilot Chat, signed in with school Microsoft 365 accounts	All staff	Drafting, summarising, planning	None

Generated [publication date] from these answers: Setting: Secondary · Structure: Single school · Exam centre: Yes · Staff use: Permitted with rules · Pupil use: Supervised classroom use · Platform: Microsoft 365 · Where you are: Piloting · DPIA process: Yes · Filtering: Not yet · Optional additions: none.

Clause library v1.0, [publication date]. Adapted from The School AI Governance Handbook, CC BY-NC-SA 4.0. Review before adoption; this is a starting draft, not legal advice.