

Artificial Intelligence (AI) Policy



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1. Introduction

- 1.1. **Coldean Primary School** recognises the potential of artificial intelligence (AI), including both generative and predictive AI, to transform the way we work and learn.
- 1.2. We are committed to ensuring we use AI tools in a secure and responsible way, respecting confidentiality and third-party rights. This includes any AI tools used by third parties on our behalf.
- 1.3. This policy provides guidance to staff on using and deploying AI tools in the course of their work, the circumstances in which we will monitor use of AI, and the action we will take if this policy is breached. It should be read in conjunction with other policies that are relevant to the use of AI in school, e.g.
 - Data Protection Policy
 - Cyber Security Policy
 - Confidentiality Policy
 - Equality Policy
 - Social Media Policy
 - Acceptable Use Policy
- 1.4. This policy applies to all individuals, including employees, workers, temporary and agency workers, contractors, interns, volunteers and apprentices (referred to as 'staff' in this policy).
- 1.5. This policy has been informed by the DfE's guidance set out in, <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education#opportunities-for-the-education-sector>. We will review and update this AI policy regularly to take account of changes in technology, legal obligations and best practice. We will circulate any new or modified policy to staff when it is adopted.
- 1.6. The headteacher is responsible for monitoring and implementing this policy. If you have any questions or comments on this policy, please contact the headteacher.

2. Scope

- 2.1. This Policy applies to all staff, including temporary staff, consultants, governors, volunteers, and contractors, and anyone else working on our behalf. It is also applicable to pupils.
- 2.2. It covers the usage of AI tools designed to:
 - Generate content (e.g., text, images, audio) using machine learning models.
 - Predict outcomes based on student performance data or other metrics
 - Perform automated tasks integrated into school management or educational software.
- 2.3. The policy also addresses AI tools embedded within educational platforms and school administration software, ensuring these are used in line with the school's standards for safeguarding, ethics, and data protection.

3. What is meant by AI?

- 3.1. There is no single definition of artificial intelligence (AI). Broadly speaking it is the simulation of human intelligence in machines, generally computer systems.
- 3.2. AI tools can learn, problem-solve, make decisions, and understand language. This can be contrasted with non-AI pre-programmed tools, which generally apply the same set of rules each time unless a human intervenes to update the rules. An AI tool can learn and adapt without human intervention.
- 3.3. There are several types of AI, including generative, predictive and extractive:

Generative AI	An AI tool that <i>generates</i> new, realistic content in the form of text, audio, computer code, data or images etc For example, using an AI tool to: — generate a teaching plan or marketing blog — improve an email you have already written — write a product description or a job description — write a script or slides for a presentation — check, amend and improve your grammar, spelling and writing style — summarise a report or large block of text — power sophisticated chatbots, or — write software code or find common bugs in code
Predictive AI	An AI tool that analyses data to make <i>predictions</i>, eg about: — behaviour, or — how busy traffic will be at any particular time
Extractive AI	An AI tool that <i>extracts</i> data from the dataset it has been trained on (but can't create data)

- 3.4. This policy focuses on AI but it also applies more broadly to all forms of AI used for teaching and business purposes. A list of AI providers and tools can be found at the appendix.

4. AI guiding principles

- 4.1. Our responsible AI approach means that we:
- 4.1.1. Consider the real-world impact of any AI that we may use;
- Take action to avoid the creation or reinforcement of bias;
 - Can explain how the AI we use works;

- Create accountability through audit, governance and human oversight;
- Prepare pupils for a future in which AI technology will be an integral part; and
- Respect privacy and champion robust data governance.

4.2. We fully comply with the principles set out in the AI regulation white paper (2023) and utilise Ofsted's expectations to guide our policy further:

Regulatory principle	As providers we
Safety, security and robustness	Assure ourselves that AI solutions are secure and safe for users and protect users' data Ensure we can identify and rectify bias or error
Appropriate transparency and explainability	Are transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	Only use AI solutions that are ethically appropriate – in particular, we consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate
Accountability and governance	Ensure that 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.

5. Potential Benefits of using AI in school

- 5.1. We recognise that AI can be an efficient tool to assist staff in managing their work, marking, providing feedback, report writing, lesson planning, professional development and facilities management.
- 5.2. AI has the potential to improve productivity and accelerate developments. It may be capable of completing repetitive, manual high-volume tasks, freeing up our staff for more interesting value-added work.
- 5.3. AI is an increasingly more prevalent part of modern society and it is vital that pupils understand its benefits, risks and are educated on how to use AI effectively.

6. Potential risks of using AI in school

- 6.1. To understand the potential risks of using AI in school it is helpful to understand how AI tools are trained and how they work.
- 6.2. AI tools are trained on colossal banks of existing content from various sources; datasets. They learn to identify patterns in those datasets. The more advanced AI tools can identify those patterns without human intervention or supervision. Some AI tools will then use additional input or prompt data and feedback from users to continue to self-train. Text-generating AI tools often work by selecting the

most-likely next word in a sentence and the one after that (to create text), whereas image-generating AI tools often work by selecting the next pixel.

6.3. This raises several questions including:

- Can the AI tool reuse, recycle or republish information we input—and make that information available for other users, directly or indirectly?
- Do we have the right or permission to put information that belongs to someone else into the AI tool, e.g. confidential information, personal data or copyright material belonging to someone else?
- Who owns the intellectual property (e.g. the copyright) in the text (or image/code) produced by the AI tool?
- Can we rely on the accuracy of the text or results generated by the AI tool?
- Are there any other risks, e.g. biases in the data that the AI tool was trained on that might cause it to discriminate?

6.4 Some of these AI risks are overlapping and the following sections expand on the main themes.

Privacy and confidentiality risks

6.5 AI tools can exacerbate data and privacy risks.

6.6 Data protection law requires that we must have a lawful ground for collecting and using personal data. However, the lawful ground on which we originally collected personal data may not cover us for using that data in an AI tool. Unless additional consent is obtained, entering that personal data into a publicly-accessible AI tool (which can store the information indefinitely, recycle and reuse it) is likely to constitute a data protection breach.

6.7 Likewise, using publicly-accessible AI tools runs the risk of exposing school-owned (proprietary) information.

Safeguarding

6.8 AI tools can be used to produce content which is dangerous, harmful and inappropriate. Steps must be taken to ensure that pupils are not exposed to harmful content.

Intellectual property (IP) and trade secrets

6.9 AI tools can increase the risk that our IP will be improperly disclosed. Most publicly-accessible AI tools don't guarantee the information you input into the tool will not be used to train the AI model. This means our IP could be reproduced or made available to other users in some form.

6.10 AI-generated content may also infringe IP owned by third parties, particularly copyrights. This is effectively the same risk as above, but in reverse, i.e. we put third party information into an AI tool without proper licence, thereby breaching the third party's IP.

Accuracy

6.11 Where AI does not have the information to provide the information you have requested, it may still attempt to provide you with an output. It could do this by simply making things up (or 'hallucinating').

- 6.12 Relying on a response or text produced from an AI tool without checking could have a range of negative outcomes including damage to your reputation.
- 6.13 As well as the risk of hallucinations, the output of an AI tool may not be guaranteed to be 100% accurate. Accuracy in AI refers to how often the AI system guesses the correct answer, measured against correctly labelled test data. This is known as statistical accuracy.
- 6.14 In many cases, the outputs of an AI system are not intended to be treated as factual information, e.g. about an individual, but rather a statistically informed guess as to something which may be true about the individual now or in the future. Where this is the case, it is important that we do not misinterpret the AI as being factually or statistically accurate.
- 6.15 Another concern with AI (and other forms of AI) is the potential for bias to be embedded within the AI tool. This bias can then be perpetuated as the AI tool operates and develops, inadvertently leading to the creation of discriminatory content or decisions. This is not necessarily deliberate. The AI tool may simply be reflecting the unconscious bias of its creators or other users.
- 6.16 There are two main potential sources of bias; the data itself and the algorithm applied to the data by the AI tool:
- if the data used to train an AI tool is biased (e.g. towards a particular race or gender), the AI tool is likely to produce biased content; whereas
 - if bias is embedded into the AI algorithm (the coded instructions that tells the AI tool how to function), the output is likely to be biased even if the data itself is not biased.

Over-reliance on AI

- 6.17 There is a risk that students may become overly dependent on AI tools for learning, leading to reduced development of critical thinking, creativity, and independent problem-solving skills.

Plagiarism and Misuse

- 6.18 AI can produce written content, which students may pass off as their own work. This undermines academic integrity and necessitates stricter monitoring of student submissions.

7. Who may use AI and when?

Use of AI by Staff

- 7.1 Access to AI tools, platforms or related systems is restricted to authorised staff only in accordance with the Schedule of approved AI users, purposes and tools at the appendix.
- 7.2 You must not download to the school's network and/or use third party add-ins such as, for example, *Grammarly* without approval from the Data Manager.
- 7.3 The Schedule of approved AI users, purposes and tools at the appendix is maintained by the Data Manager and will be updated from time to time. Any request to amend or expand the Schedule should be submitted to the Data Manager.

- 7.4 Where Automated Decision-making systems are utilised, you must ensure that you have the ability to review and intervene with decisions.

Use of AI by Pupils

- 7.5 Students may use approved AI tools for research, creativity, and study purposes under supervised conditions. Staff must ensure that pupils understand how to use them responsibly.
- 7.6 Staff will be responsible for monitoring the AI use by pupils and must be mindful that AI can be used to produce harmful content, including impersonation material.
- 7.7 The school will promote a culture of responsible AI use which will be linked with age-appropriate education surrounding data privacy and online safety.

8. Guidelines for Staff on using AI tools and platforms

- 8.1 You must not use AI tools other than in accordance with the Schedule of approved AI users, purposes and tools at the appendix. If you wish to use another AI tool, you should contact the Data Manager to ask whether the AI tool can be added to the Schedule and/or whether you can be given authority to use it.
- 8.2 You must not share your access credentials or allow others to use AI tools on your behalf.
- 8.3 You must not use AI in any way that could be considered discriminatory, or could give rise to defamation, harassment, intimidation or bullying or in any way that could harm the reputation of another.
- 8.4 You must not use AI to create illegal content or for illegal purposes.
- 8.5 You must not use offensive, obscene or abusive language, graphics or imagery when inputting content into AI and must not attempt to create content which is offensive, obscene or abusive through your use of AI tools.
- 8.6 AI tools must be used responsibly, and they must not be used as a replacement for professional judgment and expertise.
- 8.7 Where staff utilise AI to support with lesson plans and production of education resources, staff remain professionally accountable for the accuracy and quality of the work produced.
- 8.8 Unless specifically authorised to do so, you must **not** input into a publicly-accessible AI tool:
- the school's trademarks, brands, logos or any other identifying material;
 - the school's name, email or other contact details (other than where required to input your work email address);
 - proprietary school information;
 - customer or supplier materials, information or data;
 - confidential information;
 - pupil data
 - usernames, passwords (other than for the AI tool itself), and security tokens; or

- personal data, i.e. information or data from which any living individual can be identified—including personal data relating to employees, customers, suppliers and unconnected third parties.

This includes inputting data as training data to an AI technology or in any instruction or prompt (a question or request that you write for the AI tool to answer or solve).

- 8.9 When using AI in school, you must always use your school email address to create and log in to any AI account (do not use your personal email address or login credentials).
- 8.10 You must protect your login credentials and ensure any AI accounts that you hold are not accessible to unauthorised third parties. The use of multi-factor authentication is advised in respect of any AI tools and technologies used.
- 8.11 Your use of AI in school must be limited to business-related purposes and should, at all times, be in accordance with all applicable laws (including data protection and privacy laws) and relevant policies (see section 1.3 above).
- 8.12 You are responsible for ensuring the generated content aligns with our values, ethics and quality standards. Before using any AI generated content, you must carefully review it and ensure you do not use content that:
 - reveals personal data about any school stakeholder;
 - has the potential to breach the intellectual property rights of a third-party;
 - is misleading and/or cannot be verified;
 - is discriminatory, otherwise biased or offensive.
- 8.13 When publishing or distributing content generated in whole or part using AI tools, you must make known that the content has been generated by AI, e.g. by including a disclaimer.

9 Guidelines for Students using AI tools and platforms

- 9.1 Pupils will have the opportunity to engage with age-appropriate AI-based projects, allowing them to explore how AI can be used to their advantage.
- 9.2 A culture of responsible AI use will be cultivated by involving pupils in discussions around topics such as data privacy, bias, safeguarding, and the broader social implications of AI technologies.
- 9.3 Students should not input personal, sensitive, or confidential information into AI tools.
- 9.4 AI education will be embedded into the curriculum to help students understand the capabilities, limitations, and ethical considerations of AI. They will receive guidance on how to identify trustworthy AI sources and assess the credibility and accuracy of AI-generated content at an age-appropriate level.
- 9.5 AI tools and technologies [may/will] be incorporated into teaching and learning across a range of subjects and grade levels, providing pupils with hands-on experience and opportunities to build AI literacy and skills.
- 9.6 AI tools used in academic work must not be used for cheating, plagiarism, or any other unethical behaviour.

- 9.7 AI tools must not be used to impersonate individuals or organisations, in a misleading or malicious manner, or to generate content that is unlawful, harmful, or offensive.
- 9.8 AI-generated content should not be considered a substitute for pupil effort or original work. Pupils are required to put in their own effort to understand the material and produce unique content.
- 9.9 Where AI is used, Pupils must always clearly credit/acknowledge the use of known AI technology in their work when they have actively engaged with it, including the use of the particular AI model where possible.

10. Monitoring

- 9.10 Our Acceptable Use Policy applies to the use of AI technologies via the school's systems or network, in particular in relation to the school's right to monitor, intercept and read communications.
- 9.11 We will also monitor how our pupils use AI generally. The Data Manager is responsible for this monitoring.

11. Responsibility for compliance

- 11.1 All staff are responsible for ensuring their own use of AI is in accordance with this policy, and must make themselves aware of, and comply with, their responsibilities, as outlined in this policy, to protect confidential and sensitive information when using AI.
- 11.2 The headteacher is responsible for handling any complaints concerning violation of or non-compliance with this policy, including any allegations of harassment, discrimination, or bias that may be raised by employees, customers, suppliers or other third parties.

12. Breaches of this policy

- 12.1 Because of the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action under our Disciplinary Procedures and this action may lead to dismissal for gross misconduct. If you are not an employee, breach of this policy may result in termination of your contract with immediate effect.
- 12.2 You should note in particular that inputting school materials, pupil data or information, including commercially sensitive or confidential information, to AI tools may amount to misconduct even if it takes place:
- on a personal account with appropriate privacy settings;
 - outside normal working hours; and/or
 - without using the school's computers, systems and networks.
- 12.3 If, in the course of your employment, you become aware of any misconduct or wrongdoing by any employee, officer, worker or agent of the school in breach of this or related policies, you must report it to the headteacher.

- 12.4 You must also make a report to the headteacher if you become aware that:
- a customer or supplier has input confidential or proprietary school information or personal data relating to any of our staff into a publicly-accessible AI tool; or
 - a publicly-accessible AI tool has otherwise produced output that includes confidential or proprietary school information or personal data relating to any of our staff;
 - we may have used an AI tool in a way that infringes IP owned by third parties or infringes the data protection rights of a third-party, whether deliberately or inadvertently.
- 12.5 Staff who feel that they have been harassed, bullied or defamed because of material created or generated through the use of AI by a colleague should inform the headteacher in accordance with our Disciplinary Procedures.

Appendix - Schedule of suggested AI tools and users

Internal business function	Business purpose for which AI may be approved	AI provider(s)	Authority limits
Human resources	Recruitment, e.g. create job descriptions Salary benchmarking Create and review templates and guidance and develop KPIs Analyse employee sentiment and engagement	Textio Assistr.ai Payroll ChatGPT Culture Amp	These tools to be used by SLT in creating content. Content reviewed and approved by SLT before publication. Survey data to remain anonymous and confidential.
Teaching Staff	Teaching plans End of year pupil reports	ChatGPT Chalkie.ai Aila (Oak Academy) TeachMateAI Twinkl	Teachers must follow the principles specified in this document.
Finance	Financial analysing and forecasting Financial report generation Fraud detection	Tbc	Headteacher must approve any use of AI to support the SBM and/or Governors
Legal	Simplifying legal concepts Legal research Contract and document drafting	tbc	Seek advice from Local Authority