Sunningwell CE Primary School
Use of artificial intelligence (AI) policy

Approved by:	Governing Board	**Date:** 22/09/2026
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1. Aims and scope

Here at Sunningwell CE 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.

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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 and Google Gemini (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, including in compliance with intellectual property law
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR

2. Legislation and guidance

This policy reflects good practice guidelines / recommendations in the following publications:

- Generative artificial intelligence (AI) in education, published by the Department for Education (DfE)
- Generative AI: product safety standards, published by the DfE
- How Ofsted looks at AI during inspection and regulation, published by Ofsted
- AI use in assessments, published by the Joint Council for Qualifications

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)

  Data (Use and Access) Act 2025

3. Roles and responsibilities

3.0 AI lead

Our generative AI lead is the Headteacher. They are responsible for the day-to-day leadership, ownership and management of AI use in the school.

3.1 Governing board

The governing board will:

Take overall responsibility for monitoring this policy and holding the headteacher to account for its implementation in line with the school's AI strategy

Ensure the headteacher is/are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school

Governors will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools (see section 5 and appendix 1)
- Seek advice from 123/ICT, the headteacher (DSL) or the Data Protection Officer (DPO)

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- Ensure there is no identifiable information included in what they put into generative AI tools (unless strictly necessary and they have been approved to do so – check with your DPO/AI lead where appropriate)
- Acknowledge or reference any use of generative AI in their work
- Fact-check results to make sure the information is accurate

3.2 Headteacher

The headteacher will:

- Liaise with the data protection officer (DPO) to ensure that the use of AI in the school is in accordance with data protection legislation
- Ensure that the use of AI is in accordance with Keeping Children Safe in Education (KCSIE), and the school's child protection and safeguarding policy
- 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 or as new legislation is introduced
- 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, taking into account advice from the DPO and 123ICT and data protection impact assessments

3.3 Data protection officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO is Nicola Cook and is contactable via Pearl Givinchi in the office and nicola@schoolsdpo.com

3.4 Designated safeguarding lead (DSL)

The DSL 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 KCSIE and the school's child protection and safeguarding policy

Understanding the filtering and monitoring systems and processes in place on school devices

The school's DSL is Anita Leech and is contactable via head.32442@sunningwell.oxon.sch.uk

3.5 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 and appendix 1)

Seek advice from the headteacher or 123ICT, as appropriate

Report safeguarding concerns to the DSL in line with our school's child protection and safeguarding policy

Ensure there is no identifiable information included in what they put into generative AI tools (unless it is strictly necessary and they are approved to do so – they should check with the DPO/AI lead where appropriate)

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- Acknowledge or reference the use of generative AI in their work
- 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.

3.6 Pupils

Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

4. Process for approving AI use

The headteacher is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO.

Any use of generative AI by staff and pupils will be risk assessed, which will include plans for mitigating against unauthorised use cases. The intended use case will be specified and have clear benefits that outweigh the risks.

As part of this process, we will seek assurances from suppliers of AI tools about how their products meet the DfE's AI product safety standards.

If it is strictly necessary to use an AI tool to process personal data, we will carry out a data protection impact assessment (DPIA) in addition to the risk assessment. The DPO will advise on this. If the use case is approved, we will also update our privacy notices accordingly.

In the case of AI tools intended for use by pupils, the risk assessment process must consider:

- Age restrictions set by AI tools
- Statutory requirements of KCSIE and our child protection and safeguarding policy

  Filtering and monitoring standards to make sure we have the appropriate systems in place to protect pupils from harm

  The DfE's AI product safety standards

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. Technology, including generative AI, should not replace the valuable relationship between teachers and pupils.

Any content produced using AI requires critical judgement to check for appropriateness and accuracy. Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remain the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. 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. Free, for example Google AI, should not be used when dealing with child specific or sensitive data.

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact the headteacher to discuss any ideas they may have with regards to using AI, so they – in

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consultation with others, as appropriate – can assess whether they deem it to be a satisfactory new method of working.

5.2 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 that have not been approved as safe for this use case.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Sunningwell CE Primary School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Please also refer to section 11 of this policy.

5.3 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.

In addition, materials created by teachers may be copyright material. Examples of what may be deemed original creative work include:

- Essays, homework or any other materials written or drawn by a pupil aside from multiple-choice questions responses
- Lesson plans created by a teacher
- Prompts entered into generative AI tools

We will not allow or cause intellectual property, including pupils' work, to be used to train generative AI models without appropriate consent or exemption to copyright.

We are aware that secondary infringement could happen if AI products are trained on unlicensed material and outputs and then used in schools or published more widely, such as on the school's website This may include:

- Publishing a policy that has been created by an AI tool that used input taken from another school's policy without that school's permission

  Using an image on a website that has been created by an AI tool using input taken from the copyright holder without their permission

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.4 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output.

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.

5.5 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 led to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with our school's child protection and safeguarding policy.

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5.6 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 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

6. Educating pupils about AI

Here at Sunningwell CE 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.

Pupils will be taught about the potential benefits of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

7. Use of AI by pupils

We recognise that AI has many uses to help pupils learn.

Pupils may use AI tools:

- That have been approved for their use in school
- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, pupils may not use AI tools:

- During assessments, including internal and external assessments, and coursework
- To write their homework or class assignments, where AI-generated text is presented as their own work
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations)

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, pupils should reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

Pupils must consider what is ethical and appropriate in their use of AI and must not:

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- Generate content to impersonate, bully or harass another person
- Generate (including by digitally altering) or share explicit or offensive content, including, but not limited to, inappropriate or sexualised images of themselves or other people (known as ‘deepfakes’ or ‘deep nudes’)
- Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

We will continue to 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

The headteacher will ensure that internet and online safety and AI are regular items on staff meetings agendas and that staff have opportunities to develop their understanding of and skills using AI. The school will continue to take and seek advice from 123ICT on the use of technology and training opportunities.

10. Referral to our child protection and safeguarding policy

The school is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material

Harmful content

Harmful advertisements and promotions

Bullying

Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the school’s child protection and safeguarding policy, and child protection referral process.

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with our staff code of conduct.

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 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

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You must report any breach of this policy, either by you or by another member of staff, to the headteacher immediately.

11.2 By governors

Governors found in breach of this policy will be dealt with in line with the code of conduct.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy.

12. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolve and change rapidly. Consequently, this policy is a live document that must be kept updated by the headteacher and link governor 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 teaching staff are expected to read and follow this policy. The headteacher is responsible for ensuring that the policy is followed.

The headteacher with support from 123ICT will monitor the effectiveness of AI usage across the school.

We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

13. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Safeguarding policy
- Assessment policy
- Behaviour policy
- Code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy
- Complaints policy

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Appendix 1: Approved uses of AI tools (table)

A note on KeyGPT: This is The Key's AI-powered assistant for schools, included in our membership. It uses published content from The Key to improve the quality of its response, known as retrieval augmented generation (RAG). The Key has prompted the AI to give us more complete, specific responses, and instruct the AI to limit bias as much as possible. However, all AI models can make mistakes, so any important information KeyGPT gives us will be checked. Although the data we enter in KeyGPT isn't used to train AI models, we shouldn't use it to share or seek personal data about staff, pupils, parents, carers or any individual.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
KeyGPT	• Teachers • Governors • Office staff	• Letter to parents/carers • Job descriptions and adverts • Interview questions
Oak Academy AI lesson planner	• Teachers	Lesson planning

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