Wolsey House Primary School

Use of Artificial Intelligence Policy

Policy date: October 2026

Policy review date: October 2027

Together we grow, achieve and thrive.

1. Purpose and scope

Wolsey House Primary School recognises that artificial intelligence (AI), including generative AI, can support teaching, learning, accessibility and administrative efficiency. It can also produce inaccurate, biased or unsafe content and may create risks relating to safeguarding, data protection, confidentiality, intellectual property and assessment integrity.

This policy establishes a safe, lawful and transparent approach. AI will support—not replace—professional expertise, relationships, creativity or accountable human decision-making.

It applies to governors, employees, agency staff, volunteers, contractors and pupils when using AI for school-related purposes, whether on school or personal devices. It covers free and paid services, embedded AI features, chatbots, image and audio generators, transcription and translation tools, automated analytics and other systems that generate, classify, recommend or make predictions.

2. Aims and principles

- use AI only where there is a clear educational or operational benefit and the benefits outweigh the risks;
- protect pupils' safety, dignity, privacy and right to an inclusive education;
- retain meaningful human oversight and professional accountability;
- comply with data protection, safeguarding, equality, copyright and employment requirements;
- teach pupils to use and question AI safely, critically and ethically;
- reduce workload without lowering the quality, accuracy or individuality of the school's work; and
- review approved tools and uses as technology, evidence and guidance develop.

3. Definitions

Artificial intelligence (AI) describes computer systems designed to perform tasks that usually require human intelligence, such as recognising patterns, producing predictions or generating content.

Generative AI creates new text, images, audio, video, code or other content in response to instructions or prompts. Its outputs are probabilistic: they may sound convincing while being inaccurate, invented, biased or unsuitable.

An AI tool includes a stand-alone product and an AI feature embedded within another service. An output is any content, recommendation, classification or prediction produced by such a tool.

4. Legal and guidance framework

This policy has regard to the following legislation and guidance, as amended from time to time:

- Data Protection Act 2018 and UK General Data Protection Regulation
- Data (Use and Access) Act 2025
- Equality Act 2010
- Copyright, Designs and Patents Act 1988
- Keeping children safe in education
- DfE: Generative artificial intelligence (AI) in education
- DfE: Generative AI product safety standards
- DfE: Data protection in schools

- DfE: Filtering and monitoring standards for schools and colleges
- Ofsted: Using AI in education settings
- UKCIS: Sharing nudes and semi-nudes guidance

5. Roles and responsibilities

5.1 Governing Body

- approves this policy and provides strategic oversight of safe and ethical AI use;
- seeks assurance that safeguarding, data protection, equality and procurement duties are met;
- receives at least an annual report on approved tools, material risks, incidents, training and impact; and
- ensures that AI does not replace accountable human decision-making.

5.2 Headteacher

- has operational responsibility for this policy and may nominate an AI lead;
- authorises tools and material new uses following proportionate assessment;
- maintains, or delegates maintenance of, the approved AI tools and uses register;
- ensures suitable training, oversight, monitoring and incident response; and
- consults the DSL, Data Protection Officer (DPO), IT lead and other specialists where relevant.

5.3 Data Protection Officer or data protection lead

- advises on lawful basis, transparency, contracts, international transfers, retention and data security;
- determines whether a data protection impact assessment (DPIA) is required and advises on its completion; and
- supports the response to suspected personal data breaches.

5.4 Designated Safeguarding Lead

- advises on child-safety risks, age restrictions, supervision, filtering and monitoring;
- ensures AI-related safeguarding concerns are managed under the Safeguarding and Child Protection Policy; and
- considers online harm, grooming, bullying, impersonation, sexual imagery, deepfakes and harmful content.

5.5 Staff, governors, volunteers and contractors

- use only approved tools and approved accounts for school work;
- follow this policy, relevant professional standards and any tool-specific conditions;
- remain responsible for checking, adapting and approving all outputs they use; and
- report concerns, errors, unsafe content and suspected breaches without delay.

5.6 Pupils

Pupils must follow staff instructions, this policy, the Behaviour Policy, the Acceptable Use Agreement and Online Safety Policy. They must use only approved tools, for an approved purpose and with the required adult supervision.

6. Approval of AI tools and uses

No AI tool or material new use is approved simply because it is free, popular, already embedded in software or accessible from home. Before approval, the Headteacher or delegated lead will complete and record a proportionate assessment covering:

- the intended benefit, users and educational or operational purpose;
- accuracy, reliability, bias, accessibility and equality implications;
- supplier assurance, security, retention, training of the model on user content and contractual terms;
- whether personal data will be processed, the lawful basis and the need for a DPIA or privacy notice update;
- age restrictions, child-centred design, safeguarding, filtering and monitoring;
- copyright, ownership and licensing of inputs and outputs;
- human oversight, routes for challenge, and the impact if the tool fails or is withdrawn; and
- the DfE's generative AI product safety standards, where applicable.

Approval may be limited to named users, specific purposes, school-managed accounts or a pilot period. Approved tools and conditions will be recorded in Appendix 1 and reviewed at least annually and following any material change or incident.

7. Staff use of AI

Subject to approval and the controls in this policy, staff may use AI to assist with tasks such as generating ideas, drafting or adapting resources, planning, summarising non-confidential material, producing practice questions, improving accessibility, translation and preparing routine administrative drafts.

When using AI, staff must:

- use their professional judgement and remain the identifiable human author and decision-maker;
- verify factual claims, calculations, quotations, references and links against reliable sources;
- review for bias, stereotyping, cultural assumptions, age appropriateness and accessibility;
- adapt outputs to the pupil, class, curriculum and school context rather than using generic text unchanged;
- ensure that final communications are accurate, respectful and consistent with school policy;
- keep an appropriate record where AI materially supports a high-impact document or decision; and
- state material AI assistance where transparency is necessary under section 12.
- AI must never replace supervision, direct assessment of a pupil, professional curiosity, safeguarding judgement or meaningful engagement with pupils and families.

8. Data protection, confidentiality and security

Staff must not enter identifiable or confidential information into a general-public AI tool. This includes names and combinations of details that could identify a person, safeguarding information, health or SEND information, photographs, voice recordings, pupil work, contact details, passwords, employment information, complaints and legal advice.

Removing a name may not be enough. Staff must consider whether contextual details could still identify the person. Where an approved use genuinely requires personal data, it may proceed only after the DPO or data protection lead has confirmed the lawful basis, minimisation, security, supplier terms, retention, transparency and any DPIA requirements.

- Use school-approved accounts and devices where specified; do not use personal accounts for school information.
- Do not upload copyrighted, confidential or commercially sensitive documents unless the use is expressly approved and lawful.
- Disable chat-history, model-training or content-sharing settings where the approved configuration requires this.
- Treat accidental disclosure to an AI service as a possible data or safeguarding incident and report it immediately under section 18.
- Do not ask for or share another person's password. Relevant records must be preserved and provided only through lawful school procedures.

9. Human oversight and prohibited uses

The school will not make a decision based solely on AI where it has a legal or similarly significant effect on a pupil, parent or member of staff. A suitably authorised person must understand the information used, test the output, consider relevant context and make the final decision.

AI must not be used to:

- make or recommend final decisions about safeguarding, admissions, attendance enforcement, behaviour sanctions, suspension or permanent exclusion, SEND provision, reasonable adjustments, attainment judgements, complaints, recruitment, capability or discipline without meaningful human assessment;
- write final safeguarding records, referrals, witness statements or incident accounts. AI may only support structure or general wording using non-identifiable information, and the staff member must write and verify the substantive record;
- fabricate evidence, citations, pupil work, observations, meeting notes or data;
- impersonate another person, create deceptive or harmful deepfakes, or generate sexual, violent, discriminatory or humiliating content;
- conduct covert surveillance, emotion recognition or biometric categorisation;
- profile or rank individuals in ways that are unfair, unlawful or outside an expressly approved process; or
- circumvent filtering, monitoring, security or the terms and age restrictions of a service.

10. Intellectual property and copyright

AI-generated content is not automatically accurate, original or free to use. Users must respect copyright, moral rights, licences and confidentiality. They must not prompt a tool to imitate a living artist or reproduce protected material for publication where permission or an appropriate exception is absent.

Before publishing or distributing an output, staff must check sources, licensing, attribution, third-party logos and the risk that the output is substantially similar to protected work. The school will not assume that a provider's terms give it ownership or unrestricted rights. Pupil work must not be uploaded or reused to train a system unless the use has been explicitly approved and the necessary legal and ethical safeguards are in place.

11. Equality, bias and accessibility

AI can reproduce or amplify bias present in data and design. Users must examine outputs for discrimination, stereotyping and unequal impact, including in relation to protected characteristics, SEND, language, culture and socio-economic circumstances. Appropriate alternatives and reasonable adjustments will be provided. AI must not be used as a substitute for knowing the child or applying the Equality Act 2010.

12. Transparency and attribution

The level of disclosure should be proportionate to the significance of the use:

Routine brainstorming, spelling or formatting support for an internal draft does not normally require a label, but the staff member remains responsible for the final work.

Material AI assistance in a published resource, policy, formal report, external communication or evidence used for a decision should be recorded or disclosed where this would help the reader understand how it was produced.

Any AI-generated image, audio, video or simulated voice must be clearly labelled when a reasonable person might otherwise believe it is real.

Pupils must acknowledge permitted AI assistance in the manner directed by the teacher, including the tool used, what it helped with and how the pupil checked or changed the output.

13. Educating pupils about AI

Through computing, relationships and health education, English and the wider curriculum, pupils will be taught at an age-appropriate level:

- what AI and generative AI are, and that outputs may be invented or biased;
- how to protect personal information and seek help after seeing harmful content;
- how algorithms can shape recommendations and influence choices;
- how to check claims using reliable sources and recognise manipulation or deepfakes;
- why authorship, attribution, copyright and honest assessment matter; and
- how AI can support creativity and accessibility without replacing independent thinking.

14. Pupil use

As a primary school, Wolsey House will take particular care over age restrictions and developmental appropriateness. Pupils may use AI only when the tool and activity have been approved, the teacher has explained the purpose and boundaries, and the required supervision is in place. Where required, pupils will use a school-managed account or a teacher-led interface rather than creating a personal account.

Pupils must not:

- enter their own or another person's personal information;
- use AI to complete work that is intended to demonstrate their own knowledge or skill;
- present AI output as wholly their own work;
- use AI to bully, harass, impersonate, deceive or generate inappropriate images or messages;
- attempt to bypass restrictions or access unapproved tools during school activities; or
- rely on AI health, safety or wellbeing advice instead of speaking to a trusted adult.

15. Learning, homework and assessment

Teachers will make clear whether AI is prohibited, permitted for a limited purpose or part of the task. The response to suspected misuse will be proportionate, evidence-informed and consistent with the Behaviour Policy; AI-detection tools will not be treated as conclusive evidence on their own.

For any formal or externally regulated assessment, the school will follow the applicable awarding-body and Joint Council for Qualifications requirements. Pupils must retain evidence of their own work where requested and acknowledge any permitted AI use. Staff must not use AI to determine marks or grades without checking the work against the relevant criteria and exercising professional judgement.

16. Safeguarding and online safety

AI-related concerns may include grooming, sexual or violent content, self-harm content, scams, harmful advice, discrimination, bullying, impersonation, deepfakes and the creation or sharing of nude or semi-nude imagery. Staff must not investigate beyond what is necessary to establish immediate safety. They must preserve relevant information and report to the DSL or deputy without delay in accordance with the Safeguarding and Child Protection Policy.

Pupil-facing tools will be considered within the school's filtering and monitoring arrangements. Appropriate supervision and reporting routes will be clearly explained to pupils. Where an AI-generated or manipulated sexual image of a child is suspected, staff must follow safeguarding procedures and must not copy, print, forward or unnecessarily view the image.

17. Training and support

The school will provide proportionate training at induction and through regular updates. This will include approved tools, prompting without personal data, checking accuracy, bias and copyright, safeguarding, online safety, assessment integrity and reporting concerns. Staff must seek advice before using a tool that is not covered by the approved register.

18. Concerns, incidents and breaches

Any person may raise a concern with the Headteacher, DSL, DPO/data protection lead or another appropriate senior leader. Immediate risks to a child must be reported to the DSL without delay. Suspected personal data breaches must be reported promptly under the school's Data Protection and Personal Data Breach procedures.

The school will secure accounts or devices where necessary, preserve relevant evidence, assess harm, support those affected, notify external bodies where required and review controls. Staff and governor breaches may be considered under disciplinary or governing-body procedures; pupil breaches will be managed under the Behaviour Policy and safeguarding procedures. The response will be fair, proportionate and attentive to SEND, age, intent, impact and any unmet need.

19. Monitoring and review

The Headteacher will monitor implementation, including approved uses, training, incidents, pupil experience, equality impact, workload and educational benefit. The Governing Body will receive an annual assurance report. This policy will be reviewed annually and sooner following significant legal or guidance changes, a serious incident or a material change in school use.

The approved tools and uses register is a live operational record and may be updated between full policy reviews, provided that changes follow section 6 and are reported through the school's governance arrangements.

20. Related school policies

This policy should be read with the school's current policies and procedures on safeguarding and child protection; online safety and acceptable use; data protection, privacy and breaches; behaviour, anti-bullying and child-on-child abuse; staff conduct and whistleblowing; SEND, accessibility and equality; assessment and curriculum; complaints; records and freedom of information; procurement; and IT security.

Appendix 1: Approved AI tools and uses register

Only uses recorded as approved may proceed. The register should be completed and maintained by the Headteacher or delegated lead. A tool may have different approval conditions for staff and pupils.

Tool / supplier	Users	Approved purpose	Data permitted	Controls / limits	Approved by / date	Review date

Until an entry has been approved and recorded, the tool or use must be treated as unapproved.

Appendix 2: Quick check before using AI

Check	Question	If the answer is no or uncertain
1. Approved	Is this tool and use on the approved register?	Stop and ask the Headteacher or delegated lead.
2. Private	Have I removed all personal, confidential and identifying information?	Do not enter the information; seek DPO/DSL advice.
3. Safe	Is the activity age-appropriate, supervised and within safeguarding controls?	Do not proceed; consult the DSL.
4. Lawful	Do I have the right to use the material, and have copyright and supplier terms been considered?	Use another source or seek advice.
5. Checked	Have I checked facts, sources, bias, accessibility and suitability?	Verify and adapt before use.
6. Human	Am I taking responsibility for the final content or decision?	AI must not make the decision or replace professional judgement.
7. Transparent	Does this use need to be recorded, acknowledged or labelled?	Apply section 12 or seek advice.