AI Policy

Barlow Church of England Primary School

Version 2

Last Reviewed	**April 2026**
Reviewed By (Name)	**Penny Watkin**
Job Role	**Headteacher**
Next Review Date	**April 2027**
Version produced Spring 2026	Amendments indicated in green text. **The following has been implemented throughout:** When we use the word **must**, this refers to legal requirements. When we use the word **should**, this does not refer to a legal requirement, but what we consider is important to help you to comply effectively with the law. You should do this unless there is a good reason not to. If you choose to take a different approach, you need to be able to demonstrate that your approach complies with the law. When we use the word **could**, this refers to an option or options that you could consider to help

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	you comply effectively. There are likely to be various other ways you could comply. **1.1** wording updated **1.4** wording updated **2.2** wording updated **3.4** added paragraph re the use of AI being carefully planned **3.6** added paragraph re transcribing and recording online meetings **3.9** added paragraph re DfE guidance on how authorised AI tools may be used **3.17** added info re how staff must ensure no copyrighted materials are uploaded to AI systems **3.18** added further info re copyright **4. Our core AI tool-** new section added **5.5** added info re how pupils will be taught to label work were assisted by AI **8. Data Protection implications of using AI-** 8.2, new paragraph re LGA guidance and what school should do when procuring or commissioning any AI tools or services **8.3** added info - before an AI tool is authorised for use assurances including confirmation that the tool complies with UK copyright and intellectual property law must be obtained. **10.4** added info re the use of watermarking, metadata checks or other technologies to support the monitoring of AI, also cross-referenced this in **section 9**

This policy will be kept under regular review to reflect changes in guidance, technology, and data protection law. It will be reviewed at least annually by the Data Protection Officer, and sooner if significant legal or regulatory changes occur. The school should also undertake an annual review of this document and earlier where necessary.

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1. Introducing our Artificial Intelligence Policy

1.1. Artificial Intelligence (AI) technology is already widely used in both commercial and everyday applications, and its influence is anticipated to continue to grow exponentially, impacting almost all industries and job sectors including education, particularly with the development of Generative AI. Generative AI has become a widely used tool that is accessible by all for everyday use and purposes. Generative AI refers to technology that can be used to create new content based on large volumes of data that models have been trained on from a variety of works and other sources. Generative AI continues to rapidly evolve and is increasingly freely available technology generating writing, audio, codes, images and video simulations. Whilst this offers opportunities for schools and their pupils, it also increases risk.

1.2. AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. The primary purpose of this policy is establish a responsible and consistent approach to AI across our School, for the following aims:

- Enhance academic outcomes and educational experiences for pupils
- Support staff in managing their workload more efficiently and effectively
- Educate staff and pupils about safe, responsible, ethical and legal use of AI
- Protect the privacy, rights and data of all stakeholders
- Incorporate AI as a teaching and learning tool to develop staff and pupils' AI literacy and skills
- Prepare staff and pupils for a future in which AI technology will be an integral part
- Promote equity in education
- Improve and streamline school operations to minimise cost and maximise efficiency.

1.3. The purpose of this policy is to ensure users are aware of the controls and methods the school has put in place to manage the use of AI. Users are expected to comply with the policy to ensure that AI tools are used appropriately.

1.4. We recognise that the technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. We recognise the guidance provided by the Department for Education (DfE) including the AI Policy Paper and Product Safety Framework. This AI policy has been informed by DfE guidance.

1.5. We should be transparent and accountable about the use of AI technology so that stakeholders, including staff, pupils, parents and other partners understand where and how AI is used and who is responsible. Any stakeholder feedback or questions about the use of AI should be considered and responded to appropriately.

1.6 By adhering to this policy, we aim to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all involved.

2. Scope and Responsibilities

2.1. This policy applies to the use and configuration of all AI tools that have either been provided by Barlow Church of England Primary School as part of general IT tools available such as: Microsoft 365 Copilot and tools procured by Barlow Church of England Primary School for a specific use. These are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches and a

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Data Protection Impact Assessment must have been carried out. These are referred to throughout as '**authorised AI'.**

Other AI tools, which may be available for free or on a subscription basis and directly accessed by users via the internet are not authorised and must not be used. These rules apply when using both Barlow Church of England Primary School owned devices and any personal devices when used for work purposes.

2.2. AI agents are not currently authorised for use.

2.3. This Policy applies to all staff (supply, trainees, temporary), consultants, governors, volunteers and contractors, and anyone else working on our behalf, described as "staff" within this policy. It is also applicable to pupils, but this group will require support and guidance from staff as part of their learning.

2.4. All staff are responsible for reading and understanding this policy before using any AI technology.

2.5. All leaders are responsible for ensuring their staff team read and understand this policy before using AI technology and that they follow this policy, including reporting any suspected breaches of it. The breach should be dealt with in line with the school's Cyber Security and IT Acceptable Use Policies.

2.6. There are a number of staff in the school who are key contributors to AI policy and development:

- The headteacher acts as a lead for our school regarding the use of AI technology, monitors compliance with this policy and works with other staff to communicate, promote and regulate AI use, providing or arranging for training to be given where necessary. They should keep staff informed about which platforms are **authorised AI**.
- Our Data Protection Officer is responsible for advising us about our data protection obligations in relation to AI use.
- Our IT provider provides technical support and guidance on the operation of AI.

2.7. Training should emphasise how authorised AI can augment staff roles, providing them with more time and resources to focus on tasks such as personalised instruction, pupil engagement, and critical thinking.

2.8. By combining the benefits of AI technology with professionals' expertise, experience, and professional judgment, we can create a collaborative and effective educational environment that maximises the benefits of both human and AI capabilities.

2.9. This policy also links to other school policies, including the Child Protection and Safeguarding, Data Protection, IT Security and Acceptable Usage and IT Disaster Recovery and should be read in conjunction with them.

3. Use of AI by Staff

3.1. All users of AI must comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There must be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We should prioritise the safeguarding of our pupils and their online safety and should not knowingly use any AI technology that puts their safety or privacy at risk. Staff must not allow or cause intellectual property, **including pupils' work**, to be used to train Generative AI models without appropriate consent or exemption to copyright.

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3.2. Staff should not use AI to replace strategic decision making or use it to make decisions that could have a significant impact on people.

3.3. AI tools should be used responsibly, ensuring they complement staff professional judgment and expertise, without replacing them.

3.4. Use of AI should be carefully planned, and staff must consider whether using AI is appropriate for the specific context, subject area or pupil group. What is appropriate in one setting may not be suitable in another, and staff should consult with the AI Lead, DPO or IT Lead when unsure.

3.5. Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used and staff should rely on their expertise to ensure that they review and tailor any AI output.

3.6. AI notetakers must never be used in a meeting without completing a prior Data Protection Impact Assessment and making all participants aware before the meeting starts. If a participant objects to the use of an AI notetaking app, the meeting organiser should take into account the nature of their objection and if their concerns cannot be overcome, the organiser should consider whether it is proportionate to continue the meeting without the use of AI. Although it is difficult to control the actions of external attendees at meetings organised by Barlow Church of England Primary School, our staff should let attendees know upfront that they should not use AI notetakers and as the meeting organiser our staff should take responsibility for the taking and distribution of notes.

3.7. Online meetings arranged by us should be held on Microsoft Teams. The transcribe and record functions maybe used where required. All parties must be notified and transcriptions and recordings stored only for as long as necessary, as outlined in our Retention Policy.

3.8. Staff should receive appropriate training and support to effectively integrate authorised AI into their work including professional development opportunities focused on authorised AI tools and their effective integration into school administrative and teaching practices. Training and support should be planned as part of staff personal development reviews and appraisals or on an as-needed basis. Staff have a responsibility to identify any training, and development needs to ensure they adhere to this policy and should discuss these with their line manager.

3.9. In line with DfE guidance, authorised generative AI tools may be used, where appropriate, to support tasks such as creating lesson plans, quizzes, revision activities, communications for parents and carers, and assisting with timetable planning. As with all AI use, this must be done responsibly and in accordance with this policy and the school's data protection requirements.

3.10. Authorised AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, authorised AI platforms can suggest specific topics or learning activities. Teaching staff are permitted to use these suggestions as a starting point, incorporating their professional expertise to customise the lesson plans and make necessary adjustments to ensure individual pupil learning objectives are met.

3.11. Authorised AI tools can be utilised to automate certain aspects of marking of pupil work, such as multiple-choice or fill-in-the-blank assessments. Teaching staff can use authorised AI-powered marking software to

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speed up scoring fact-based responses to objective questions, providing more time to support pupils individually.

3.12. Teaching staff can also use authorised AI to identify areas for improvement in more subjective written answers. Teaching staff should review and verify AI-generated marks or feedback to ensure accuracy, and add their professional judgment, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.

3.13. Teaching staff can also support pupils to gain feedback on their work themselves using authorised AI, replicating peer assessment processes. This will allow pupils to receive instant personalised and valuable feedback and improvement strategies on their work, helping to identify misconceptions and gaps in knowledge, as well as helping them develop more structured or creative writing. It is important that teaching staff play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.

3.14. Teaching staff can use authorised AI to assist in writing pupil reports, ensuring accuracy and efficiency while maintaining their professional judgment. Where AI has been used to support with report writing, the staff member should always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.

3.15. Staff can use authorised AI as a starting point to gather relevant information and identify patterns in pupil attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each pupil's progress. By using AI responsibly in pupil progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on pupils' academic achievements and overall development.

3.16. Where staff use AI as part of their work, they should be clear where it has been used and what additional professional review or revision has been carried out. Staff should not use school AI tools or data for personal gain or for any means in contravention of applicable laws.

3.17. All staff must ensure that no copyrighted materials (including commercial textbooks, purchased digital resources, licensed teaching materials or third-party content) are uploaded into AI systems unless the school holds explicit rights or permission.

3.18. Staff must ensure that any materials they create, adapt, or upload to AI systems do not infringe copyright. They should also be aware that AI-generated content may not be eligible for copyright protection under UK law; therefore, staff must exercise caution when sharing or publishing AI-generated resources externally.

4. Our core AI tool.

We are a Microsoft school. Therefore, our core AI tool is Microsoft Co-pilot.

Microsoft 365 Copilot is deployed within the school's existing Microsoft 365 tenancy, meaning all personal data processed by Copilot remains protected under the school's own licensing, identity management, and compliance controls. Copilot can only access information that staff and students already have permission to view within Microsoft 365, and it does not use school data to train any underlying AI models. Microsoft confirms that prompts, responses, and organisational data accessed through Microsoft Graph stay within the

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school's secure Microsoft 365 environment and are protected by the same GDPR-aligned privacy, security, and data residency commitments that apply to all other Microsoft 365 services

We have trained our staff on its use and included it in our Privacy Notices.

5. Use of AI by Pupils

5.1. As part of child protection and safeguarding policies and processes, the school should ensure that its pupils continue to be protected from harmful content online, including that which may be produced by AI technology and that any authorised AI tools are assessed for appropriateness for individual pupils' age and educational needs. We will ensure that staff are aware of the risks of AI which may be used to generate harmful content including deepfake and impersonation materials.

5.2. Pupils should be encouraged to explore and experiment with authorised, age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis, and creative expression.

5.3. A culture of responsible AI use will be fostered through engaging pupils in conversations about data protection, privacy, bias, safeguarding, and the social impact of AI applications.

5.4. Pupils will be taught not to enter personal, sensitive or confidential data into Generative AI tools.

5.5. Pupils will be taught to clearly label any work that has been created, drafted, or edited with the assistance of AI. They will also be required to declare the use of AI in homework, coursework, or assessed work, in line with government expectations for transparency in AI-generated content.

5.6. AI education should be incorporated into the curriculum to provide pupils with an understanding of AI's capabilities, limitations, and ethical implications. Guidance should be provided on identifying reliable and trustworthy AI sources and evaluating the credibility and accuracy of AI-generated information.

5.7. Authorised AI tools and technologies may be integrated into teaching and learning activities across various subjects and year groups, providing pupils with hands-on experience and opportunities to develop AI literacy and skills.

6. Potential Misuse of AI

6.1. Pupils will receive education on responsible and ethical AI use, including the potential risks and consequences of relying solely on AI tools to complete assignments, coursework, or homework. Pupils should be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.

6.2. Teaching staff should emphasise the importance of critical thinking, creativity, and originality in pupil work, discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations should be communicated to pupils regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.

6.3. Teaching staff should employ various assessment methods to evaluate pupil understanding and ensure that they have genuinely grasped the subject matter. This may include class discussions, oral presentations, practical demonstrations, written reflections, and project-based assessments. By utilizing diverse assessment

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strategies, teaching staff can verify pupils' comprehension beyond what AI tools can assess, promoting deep learning and authentic pupil engagement.

6.4 Teaching staff should educate pupils on the potential misuse of AI by those seeking to deceive or trick pupils into actions that they would otherwise not contemplate, for example interaction with others who are not who they claim to be but who can imitate who they claim to be using AI technology.

7. Ethical Use of AI

7.1. The use of AI systems, in particular Generative AI, should be carried out with caution and an awareness of their limitations. Whether staff are using authorised AI for teaching or school administrative purposes, or with pupils who will make use of this technology, they should be mindful of, and instruct pupils about, the following considerations:

7.2. Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socioeconomic background.

7.3. Accuracy – information may be inaccurate when generated so any content should be fact-checked. Tools may provide highly plausible and coherent results but may still contain errors (Hallucination).

7.4. Human oversight – a lack of human intervention may result in AI outputs going unchecked. Humans will ensure that outputs align with ethical standards and educational values, and staff should be aware that Generative AI lacks flexibility, human understanding and compassion.

7.5. Currency – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

7.6. Environmental issues –AI requires energy to run. Therefore, it should only be used when relevant, appropriate and proportionate, where it is the most suitable and sustainable option.

7.7. Inferring Emotion - The European Union's Artificial Intelligence Act (AI Act) imposes strict regulations on the use of emotion recognition systems (ERS) within workplaces and educational institutions. These systems, defined as AI tools designed to identify or infer emotions or intentions of individuals based on their biometric data, are generally prohibited in these settings. Although the Act does not apply in the UK, this type of AI should not be used in Barlow Church of England Primary School .

8. Data Protection implications of using AI

8.1. Staff and pupils should be aware that any information entered into a Generative AI model is no longer private or secure. AI systems often learn and evolve based on the data provided, raising significant data protection concerns. Staff and pupils should not enter any personal information (personal data, intellectual property or private information (including commercially sensitive information, such as contracts)) into any Generative AI model, especially those that generate content based on provided information. Staff should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

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8.2. When procuring or commissioning any AI-enabled tool or service, the school should assess equality, data protection, and algorithmic risks throughout the procurement process, informed by public sector guidance such as the Local Government Association's Responsible Buying AI framework. This includes questioning suppliers about their testing of equality impacts, data protection safeguards, training data sources, and model performance. Equality and data protection requirements should be built into tendering and contractual arrangements. AI systems should be monitored throughout their lifecycle to ensure they remain safe, lawful, equitable, and effective.

8.3. Before any AI tool is authorised for use, the school must obtain clear vendor assurances regarding training data sources and input transparency, including confirmation that the tool complies with UK copyright and intellectual property law.

8.4. Staff who wish to utilise new (not yet authorised) AI tools should ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required and follow the school Data Protection Policy and Data Protection Impact Assessment Procedure. Staff should be aware that it is not always easy to recognise when AI tools are processing personal data and they should not presume that no processing is taking place.

8.5. When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out.

8.6. Any DPIA or assessment of the data protection aspects of the use of AI should include:

- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.
- What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.
- A clear indication where AI processing and automated decisions may produce effects on individuals.
- Consideration of both individual and allocative harms (for example, where the harm results from a decision to not permit a pupil to take a certain subject at GCSE or A Level) and representational harms (for example, selecting groups of pupils for different interventions results in gender or racial bias).
- How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.
- An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
- If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy in order to justify the use of the AI tool in the DPIA.
- Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
- The potential impact of any security threats.
- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders.
- Whether processing is intentionally or inadvertently processing special category data- there are many contexts in which non-special category data is processed, but infers special category data (for example, where a name infers a particular race).
- A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

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9. Cyber security

9.1. Our school should take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to helpdesk@mercuryavs-ltd.co.uk and the Data Protection Officer.
- Carrying out an evaluation of the security of any AI tool before authorising it for use. This includes reviewing the tool's security features, terms of service and data protection policies. This work should form part of the DPIA process.
- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.
- Maintaining appropriate technical measures to detect misuse of AI tools. See Section 10 for further information on monitoring AI-generated content.

10. Authorised AI Tools

10.1. The following is a list of authorised AI tools for Barlow Church of England Primary School. The school allow access to the following AI tools for business purposes and a Data Protection Impact Assessment has been completed for each of these:

Supplier/System	Authorised purpose	Authorised users [Add/delete as appropriate]:
• MIS AI function - Arbor	• Drafting internal guidance, training and presentations • Providing summaries • Idea generation	• Staff •
• Microsoft 365 Copilot	• Reports • Policies • Lesson plans	• staff
• Canva	• Reports • Policies • Lesson plans • Newsletters	• staff

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10.2. The listed AI tools may be updated at any time. Should staff wish to use another AI tool not listed, they must contact the Headteacher to review permission to do so.

Authorised AI tools must only be used by staff for the following business purposes:

- Drafting internal guidance, training and presentations
- Lesson planning
- Conducting research
- Developing code
- Providing summaries
- Idea generation

10.3. All other purposes must be authorised in advance by the Headteacher. Before using any AI tools, staff should be provided training to ensure human reviewers (those who conduct monitoring of these applications) have a correct understanding and do not add any bias into the AI systems/functions.

10.4 The school may use watermarking, metadata checks, or other appropriate technologies to support the monitoring of AI-generated materials and to help ensure compliance with copyright, academic integrity expectations, and responsible use of AI systems.

11. Definitions

- **Algorithm** is a rule given to an AI machine to perform a task.
- **Artificial Intelligence (AI**) is an umbrella term for a range of algorithm-based technologies and approaches that often attempt to mimic human thought to solve complex tasks, these may include, visual perception, speech recognition, decision making, and translation between languages.
- **Centre of Excellence** is a group with a shared area of focus and subject matter expertise that they use to support others, usually by providing tips, insights, training and research.
- **ChatGPT** is owned by OpenAI LP, an artificial intelligence research lab. GPT stands for 'Generative Pre-trained Transformer'. It means that the model has the ability to generate text or other forms of output.
- **Generative AI** is a form of AI, which produces new content, such as images, text or computer code. It works by using large quantities of data, often harvested from the internet, to train a model in the underlying patterns and structures of that data. After many rounds of training the model is capable of generating new content. When a user provides a prompt or input, the AI evaluates the likelihood of various possible responses based on what it has learned from its training data. It then selects and presents the response that has the highest probability of being the right fit for the given prompt. That prompt and response then may be fed back into the model to provide further training.
- **Guardrails** are restrictions and rules placed on AI systems to ensure they handle data properly and ethically.
- **Hallucination** is when AI presents information as fact when it is not actual fact.
- **Large Language Model (LLM)** is a huge database of language knowledge that can write articles, answer questions or create realistic dialogue and is pre-trained on large amounts of data.
- **Natural Language Processing (NLP)** understands written and spoken language e.g. translations.

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