Hunstanton Primary School

Use of Artificial Intelligence (AI) Policy

Approved by:	Governing board
Approval date:	October 2026
Review cycle:	Annual
Review date:	October 2027
Person responsible:	Headteacher

Contents

Section	Page
1. Aims and scope	3
2. Legislation and guidance	3
3. Roles and responsibilities	4
4. Process for approving AI use	6
5. Staff and governors' use of AI	6
6. Educating pupils about AI	8
7. Use of AI by pupils	9
8. Formal assessments	10
9. Staff training	11
10. Referral to our child protection and safeguarding policy	11
11. Breach of this policy	11
12. Monitoring and transparency	12
13. Links with other policies	13
Appendix 1: Approved uses of AI tools	14

1. Aims and scope

Here at Hunstanton 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.

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 applies to the use of artificial intelligence, including generative AI tools and chatbots, by staff, governors and pupils. Only tools approved by the school may be used for school purposes, as set out in Appendix 1.

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

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 this policy
- Ensure the headteacher is 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 the data protection officer (DPO), the AI Lead and the designated safeguarding lead, as appropriate
- 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:

- Take responsibility for the day-to-day leadership and management of AI use in the school
- Liaise with the data protection officer (DPO) to ensure that the use of AI in the school is in accordance with data protection legislation
- Liaise with the designated safeguarding lead (DSL) to 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
- 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 data protection impact assessments

3.3 Data protection officer (DPO) and data protection lead

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 Stuart Lee and is contactable via stuart.lee@dataprotection.education.

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 the Headteacher and is contactable via the School Office.

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/Data protection officer / DSL, 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)
- 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 remains the professional responsibility of the person who produced it.

Staff and governors should be transparent about their use of AI where appropriate, particularly when producing significant documents or materials shared externally. All AI-generated content must be checked for accuracy and suitability before use, and responsibility for the final content remains with the individual concerned.

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.

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 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, Hunstanton Primary School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy: Data Protection Policy.pdf. Please also refer to section 11 of this policy.

5.3 Intellectual property

We recognise the importance of respecting copyright and intellectual property rights when using generative AI.

Staff and governors must ensure that any materials entered into AI tools, including children's work, photographs, artwork, teaching resources and documents, are used appropriately and do not infringe copyright or intellectual property rights.

We will not knowingly allow pupils' original work or other protected materials to be used to train AI models without appropriate permission or another lawful basis.

AI-generated content must be checked before being used or shared to ensure that it is appropriate and does not infringe the rights of others.

Where there is uncertainty about copyright or intellectual property, staff should seek advice from the Headteacher before using or publishing the material.

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: Concerns and 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.

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: Equality policy.
- 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

At Hunstanton Primary School, we recognise the importance of preparing pupils for a world in which artificial intelligence (AI) is becoming increasingly common. Through our curriculum, we aim to develop pupils' knowledge, confidence and critical thinking skills so that they can understand and engage with technology safely and responsibly.

Education about AI will be delivered in an age-appropriate way, primarily through Computing, PSHE and online safety lessons, as well as assemblies and other relevant curriculum opportunities.

Pupils will be supported to develop an understanding of:

- **What AI is and how it is used** – recognising examples of AI in everyday life and exploring some of its potential benefits, including how it can support learning, creativity and problem-solving.
- **Using technology responsibly** – understanding the importance of creating and sharing digital content safely, respecting others' work and protecting personal information.
- **Accuracy and reliability** – recognising that information generated by AI is not always correct and developing the skills to question, check and evaluate information rather than accepting it at face value.
- **Bias and misleading content** – understanding, at an age-appropriate level, that AI-generated information, images and videos may be inaccurate, misleading or biased.
- **Finding and evaluating information online** – learning how search engines organise and rank information and why the first result is not necessarily the most reliable.

- **Online safety** – recognising potential risks, including inappropriate content, misinformation and AI-generated images or messages, and knowing how to seek help from a trusted adult.

In EYFS and Key Stage 1, the emphasis will be on developing basic digital literacy, recognising trustworthy information and understanding how to stay safe online. In Key Stage 2, pupils will increasingly explore how digital information is created, presented and shared, including an introduction to AI and its potential benefits and limitations.

Any direct use of generative AI tools by pupils in school will be carefully considered, age-appropriate, risk-assessed and supervised by staff, with appropriate safeguarding and data protection measures in place.

Our aim is to ensure that pupils leave Hunstanton Primary School with the foundations needed to become safe, responsible and thoughtful users of technology.

7. Use of AI by pupils

At Hunstanton Primary School, we recognise that AI can offer opportunities to enhance teaching and learning. However, given the age of our pupils, its use must be carefully managed to ensure it is safe, appropriate and supports rather than replaces children's learning.

Pupils will not be expected or encouraged to access generative AI tools independently. Where AI is used as part of classroom learning, this will be planned and supervised by a member of staff.

Permitted use

Pupils may explore AI:

- Through teacher-led activities that introduce how AI works and how it is used in everyday life.
- When learning about the benefits and limitations of AI, including the accuracy and reliability of AI-generated information.
- Through demonstrations using school-approved, age-appropriate tools, for example when exploring AI-generated images or comparing AI-generated information with other sources.
- As part of activities that develop critical thinking, creativity and digital literacy.

Any tools used must be approved by the school, comply with relevant age restrictions and have appropriate safeguarding and data protection measures in place.

Where pupils use AI-generated content in their work, they will be encouraged to acknowledge this in a way that is appropriate to their age and understanding.

Unacceptable use

Pupils must not use AI tools:

- To complete homework, classwork or assessments and present AI-generated answers or content as their own work.
- To produce writing, calculations or other work that replaces their own thinking and learning, unless explicitly directed as part of a supervised learning activity.
- To create or share content that is unkind, offensive, discriminatory, threatening or intended to upset, bully or impersonate another person.
- To create, alter or share inappropriate images or videos of themselves or others, including misleading or manipulated images (sometimes referred to as 'deepfakes').
- To enter or share personal or sensitive information about themselves, other pupils, families or staff.
- To access AI tools or content that has not been approved for use in school.

This list is not exhaustive.

Responding to misuse

Any concerns about inappropriate use of AI will be addressed in line with the school's Behaviour Policy, Online Safety Policy and Safeguarding and Child Protection Policy, as appropriate.

Our approach will be educational and proportionate, taking account of pupils' age, understanding and individual needs. Where necessary, concerns will be referred to the Designated Safeguarding Lead.

We will continue to review opportunities for the safe and effective use of AI as technology develops, ensuring that pupils' safety, wellbeing and learning remain our priority.

8. Formal assessments

At Hunstanton Primary School, AI must not be used by pupils to complete assessments or produce work that is presented as their own.

This includes statutory assessments, such as the Reception Baseline Assessment, phonics screening check, multiplication tables check and Key Stage 2 assessments, as well as internal school assessments.

Staff must ensure that the use of AI does not compromise the accuracy, validity or integrity of assessment outcomes. Where AI is used to support assessment-related tasks, professional judgement must always be applied, and assessment decisions must remain the responsibility of school staff.

The school will follow relevant Department for Education and Standards and Testing Agency guidance regarding the administration and integrity of statutory assessments.

9. Staff training

At Hunstanton Primary School, we recognise the importance of ensuring that staff have the knowledge and confidence to use AI safely, responsibly and effectively.

Training on AI will form part of our annual safeguarding training, ensuring that all staff understand the potential benefits and risks associated with its use, including safeguarding, data protection, online safety and ethical considerations.

As AI continues to develop, we will provide updates throughout the academic year where relevant, including changes to guidance, emerging risks and examples of good practice.

Staff will also have opportunities to share their experiences and explore how AI can be used appropriately to support teaching, learning and reduce workload.

The Senior Leadership Team will oversee AI training and ensure that staff have access to relevant guidance and professional development opportunities.

All staff are expected to follow this policy and exercise professional judgement when using AI, recognising that safeguarding, data protection and the needs of pupils must always come first.

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 Safeguarding Policy.

11. Breach of this policy

11.1 By staff

Any breach of this policy by a member of staff will be addressed in accordance with the school's Staff Code of Conduct and, where appropriate, its disciplinary procedures.

Breaches may be investigated regardless of whether they occur during or outside working hours, or involve school-owned or personal devices, where there is a legitimate connection to the school or an impact on safeguarding, data protection or professional conduct.

Staff are expected to cooperate with any investigation into a suspected breach of this policy. This may include providing relevant information or AI-generated content, where reasonably requested and in accordance with the school's data protection and information security procedures.

Staff must report any suspected breach of this policy to the Headteacher as soon as possible. Where the concern involves the Headteacher, it should be reported to the Chair of Governors. Any safeguarding concerns must be reported immediately in accordance with the school's Safeguarding and Child Protection Policy.

Any action taken will be proportionate to the nature and seriousness of the breach.

11.2 By governors

Any breach of this policy by a governor will be addressed in accordance with the school's Governors' Code of Conduct and relevant governance procedures.

Concerns will be considered by the Chair of Governors, or the Vice Chair where the concern relates to the Chair. The response will be proportionate to the nature and seriousness of the breach and may include further guidance, training or formal action in line with the governing body's procedures.

Any breach involving safeguarding or personal data will be referred to the appropriate person and managed in accordance with the school's safeguarding and data protection procedures.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy: 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 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 staff are expected to read and follow this policy. The Headteacher is responsible for ensuring that the policy is followed.

The Headteacher 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/child protection policy
- Homework policy
- Behaviour policy
- Staff code of conduct
- Feedback policy
- Social Media and Electronic Communications policy
- Equality policy
- Complaints policy

Appendix 1: Approved uses of AI tools (table)

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
Microsoft Copilot	• All staff	• Drafting letters, emails and communications (using anonymised information where appropriate). Creating teaching resources and lesson ideas. • Summarising non-confidential information. • Supporting administrative tasks and reducing workload. • Generating ideas for school events, assemblies and activities.
SLT AI	• Headteacher and Senior Leadership Team	• School improvement and strategic planning • Drafting and reviewing policies and procedures. • Supporting school self-evaluation. • Preparing governor reports and leadership documents. • Planning staff CPD and professional development. • Supporting leadership decision-making and workload reduction.
KeyGPT	• Headteacher and Senior Leadership team • Governors	• Letter to parents/carers • Job descriptions and adverts • Interview questions
Oak Academy AI lesson planner	• Teachers	• Lesson planning
Ask Charlie AI (Headteacher Chat)	• Headteacher and Senior Leadership Team	• School improvement and strategic planning • Drafting and reviewing policies and procedures. • Supporting school self-evaluation. • Preparing governor reports and leadership documents. • Planning staff CPD and professional development. • Supporting leadership decision-making and workload reduction.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
GovernorHub AI Assistant	• Headteacher, Senior Leadership Team and Governors	• Supporting the preparation and review of governing body documents. • Summarising meeting papers, reports and other governance information. • Assisting with the drafting of governor communications and reports. • Supporting governors in understanding their roles and responsibilities. • Reducing administrative workload associated with school governance.
Canva (including AI features)	• All staff • Pupils (under staff supervision and using age-appropriate features)	• Designing presentations, newsletters, posters and school communications. • Creating teaching resources, worksheets and classroom displays. • Supporting pupils in creating presentations, posters and other curriculum-related work. • Developing pupils' creativity, digital literacy and design skills. • Using AI features to support design, image generation and content creation, where age-appropriate and authorised by staff.