



Artificial Intelligence (AI) Policy

Document History		
Date of Change	Author	Notes (changes made)
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Introduction

This policy outlines our approach to the use of Artificial Intelligence (AI) technology within St Thomas' CE Primary School. We aim to equip our school community to live in the fullness of life that Christ promised, by embracing new technologies responsibly and ethically. Our approach is informed by national guidance, including the Department for Education's policy paper on Generative AI in education.

We recognise that AI presents exciting opportunities to enhance teaching, learning, and administrative functions, but its use must always align with our core values of **compassion, faith, community, trust, perseverance** and **joy**.

Our primary Large Language Model (LLM) is Google Gemini, used within a Stockport LA sandboxed model to ensure data privacy, meaning information shared with the AI is accessible only by Stockport LA and not the wider world. Staff may only use other generative AI models if they have received approval from Stockport LA following security and compliance vetting.

The integration of AI must support our school vision:

LEARNING	GROWING	IN THE SIGHT OF GOD
Learning courageously	Flourishing in the community	Knowing that we are each cherished and loved by God
We will use AI to expand knowledge and develop skills, encouraging perseverance through critical evaluation and ownership of learning.	We ensure AI use supports community, shared responsibility, and avoids promoting bias or discrimination.	We ensure every individual is valued as uniquely created in the image of God, focusing on the safety and welfare of all learners.

Aims

In line with our commitment to support every child to flourish, this policy seeks to ensure that AI is used safely, effectively, and responsibly. It is the duty of every adult working within school to uphold these standards:

1. **To prioritise the safeguarding and wellbeing** of staff and learners, ensuring that AI use complies with statutory obligations, including data protection and *Keeping children safe in education*. **Safety should be the top priority.**
2. **To reduce workload** across the education sector, freeing up teachers' time to focus on delivering excellent teaching. AI can assist staff with administrative burdens and tasks such as lesson planning, resource creation, and tailored feedback.
3. **To maintain human oversight and professional judgement.** AI should assist, not replace, human decision making or the valuable relationship between teachers and pupils.
4. **To educate staff and learners** about safe, responsible, and ethical use of AI, and to equip learners with the critical understanding needed to navigate a world where AI is integral.
5. **To ensure fairness and accuracy** by critically checking all AI-generated outputs for appropriateness, accuracy, bias, and potential misinformation.

Related policies

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Relationship and behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- Curriculum Policies

Policy Statements

- St Thomas' CE Primary School acknowledges the potential benefits of the use of gen AI in an educational context - including enhancing learning and teaching, improving administrative processes, managing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use gen AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Children safe in Education.
- We will provide relevant training for staff and governors in the potential advantages, use of and potential risks of gen AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about gen AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with gen AI tools.
- As set out in the staff acceptable use agreement, staff will be supported to engage with gen AI tools responsibly, ensuring the protection of both personal and sensitive data.
- Staff will always ensure gen AI tools used comply with UK GDPR and other data protection regulations, verifying with the Data Protection Officer (DPO) that tools comply with standards set by the Information Commissioner's Office (ICO) before using them for work related to the school.
- All staff will be required to carefully consider the use of any gen AI tool and involve senior leadership in decision-making around its use.
- Staff should always use school-provided accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches. We will protect sensitive information. Schools and practitioners will not input any personal data, learner data or other sensitive or confidential information into gen AI tools.
- The school will ensure that when gen AI is used, it will not infringe copyright or intellectual property conventions. Care will be taken to avoid intellectual property, including that of the learners, being used to train gen AI models without appropriate consent.
- Staff must report any incidents involving gen AI misuse, data breaches or inappropriate outputs immediately to the relevant internal teams.
- The school will keep a record of all tools in use, their purpose and potential risks.
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and when acquiring and implementing gen AI systems, we will follow due care and diligence to prioritise fairness and safety.

- Where staff use gen AI tools to support their learning and teaching practice, this will be purposeful, considered, with a clear focus on ensuring impact and understanding and mitigating risk.
- Learners will not be permitted to independently access or use unapproved Gen AI tools. Any use of AI by learners will be strictly confined to school-approved, age-appropriate, and secure platforms under the direct supervision of a staff member, and with the primary aim of supporting curriculum goals
- Staff will ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing.
- Improper use of gen AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.
- The school will communicate clearly with parents and carers regarding the use of Gen AI, including the benefits, the stringent safeguarding measures in place, and guidance on the appropriate use (or non-use) of such tools at home, particularly for pupils.

Responsibilities

Role	Responsibilities
Headteacher and Senior Leaders	They are responsible for the strategic planning of how AI/gen AI will be used in the school. They must establish AI policies and procedures and ensure all staff receive relevant training and clearly understand these protocols. Senior leaders are also responsible for guidance, specifically regarding cyber security and the effectiveness of filtering and monitoring systems.
Designated Safeguarding Leaders (DSL)	Our Designated Safeguard leads have responsibility for online safety in the school. They are expected to have knowledge of AI and gen AI and its safeguarding implications, along with an in-depth working knowledge of key guidance. We ensure that appropriate specialist training is received and that ongoing training is provided for all school staff.
Data Protection Officer (DPO)	The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of gen AI, including related Data Protection Impact Assessments (DPIAs) which will be undertaken when considering use of any digital tools and services that may use personal data. Where personal data will or may inadvertently be used the school will ensure that data subjects rights are upheld. In these cases, privacy notices will be provided.
Staff	It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of gen AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that: <ul style="list-style-type: none"> • The school environment is safe • All personal, sensitive and confidential data / information is secure • That their actions do not put the reputation of the school at risk • Learners understand their responsibilities

Governors	We ensure that our governing body has a good understanding of how AI is used in a school context and potential benefits and risks of its use. They receive regular training and updates, enabling them to support the school and challenge where necessary. This may include evaluation of the use of AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated.
Parents and Carers	Our parents and carers are made aware of how gen AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their child's learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.
Pupils	Pupils are responsible for adhering to the Acceptable Use Agreement and other relevant policies. They must seek help from school staff if they are concerned about an experience that they or a peer has experienced while using AI tools. Furthermore, pupils are responsible for reporting concerns in line with the school's reporting procedure. They should also take responsibility for familiarising themselves with any AI tools used by the school and the risks they pose.
Vulnerable Groups	<p>We recognise that vulnerable learners are more likely to be at risk from the misuse of AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of AI, while being aware of the potential risks.</p> <p>Children are considered vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". As set out above, a thorough DPIA is essential.</p>

Reporting

Our reporting systems are well promoted, easily understood and easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. This can be done by speaking to or emailing the headteacher.

Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All gen AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, local authority, DPO, ICO. Any breaches must be reported to ICO within 72hrs of school becoming aware a breach has occurred.

- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of gen AI by staff, the normal staff disciplinary processes will be followed. If the misuse involved personal data and was deliberate / negligent, could constitute a criminal offence under S170 of the Data Protection Act 2018.

Risk assessment

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of gen AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and wellbeing, including exposure to inappropriate or harmful content
- Duty of care
- Bias and inaccuracy in AI outputs

Education and training

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including gen AI.

This policy outlines our commitment to integrating gen AI effectively within our school environment. We will use gen AI responsibly, safely and purposefully to support with a variety of tasks such as:

- Assisting with some routine administrative functions.
- Helping provide more personalised learning experiences.
- Supporting lesson planning, marking, feedback and reporting.
- Providing contexts to support development of critical thinking skills.
- Supporting school-level curriculum and assessment design.

As gen AI becomes an integral part of modern education, it is important that staff develop the knowledge and skills to integrate gen AI tools responsibly into teaching, learning, and administrative processes. By fostering AI literacy, staff can confidently prepare learners for a future where AI is a key driver of innovation and opportunity.

- We will support and ensure all staff can access training on the effective, responsible, lawful and ethical use of emerging technologies in education.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including 'Keeping Learners Safe'.
- We will support staff to identify, assess, and mitigate risks associated with gen AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will support staff to ensure compliance with UK GDPR and other relevant regulations while using gen AI systems.
- We will promote ethical practices in the use of gen AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.

- We will empower staff to teach learners about the safe and ethical use of gen AI, focused on critical evaluation of information and digital literacy, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.

Additional links

- [SWGfL – Artificial Intelligence and Online Safety](#)
- [Understanding AI for school – Tips for School Leaders – Teacher Development Trust](#)
- [Generative artificial intelligence \(AI\) in education](#)

Appendix 1 – Risk Assessment Matrix for Schools Implementing AI

Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
Data Protection and Privacy Breaches	Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.				Implement strong encryption, regular audits, and GDPR-compliant data management policies and conduct regular privacy audits.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.				Monitor AI communication tools, implement clear reporting mechanisms, and provide student support.
Over-reliance on AI	Over-reliance on AI tools reducing interpersonal interactions among students. Reduction in teacher autonomy and critical decision-making by overusing AI tools.				Encourage collaborative learning activities and balance AI use with social engagement. Define clear boundaries for AI use and regularly review its impact on pedagogy.
Emotional Manipulation	AI systems unintentionally affecting student mental health through curated content.				Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	AI exposing learners to harmful or unsuitable				Conduct rigorous testing of AI tools, apply effective filtering

	materials / behaviour				and monitoring and ensure human oversight.
Mental Health Impacts	Overuse of AI tools causing stress, anxiety, or dependency in learners.				Monitor usage patterns, provide mental health resources, and set expectations on use of AI systems.
Bias and Discrimination	AI systems propagating biases that impact student wellbeing or inclusion. AI models producing discriminatory or biased outcomes.				Regularly audit AI algorithms for bias and provide inclusive media literacy education and training.
Misuse of AI	Learners using AI tools for harmful, unethical or illegal purposes (e.g. nudification).				Educate learners on responsible and appropriate AI use and establish clear usage policies.
Misinformation	Creation or spread of harmful or misleading AI- generated content.				Educate staff and learners to verify AI outputs and establish clear policies for verifying content authenticity.
Digital Divide	Inequitable access to AI tools among learners from diverse demographic groups.				Provide equitable access to AI resources and ensure alternative solutions are available.
AI Ethics Awareness	Lack of awareness among staff and				Provide training and education

	learners about ethical implications of AI.				on AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	AI systems generating inaccurate or misleading recommendations.				Regularly validate AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding AI usage and learner data.				Understand legal requirements. Conduct legal reviews and consult experts on AI-related regulations.
Cyber-Security	Increased use of AI tools in cyberattacks targeting school systems and data.				Strengthen cybersecurity protocols and educate staff and learners on safe online practices.

Likelihood and Impact Definitions

- **Likelihood:** The likelihood that the identified risk will occur.
 - Low: Unlikely to occur under normal circumstances.
 - Medium: Possible occurrence based on past trends or vulnerabilities.
 - High: Likely to occur without intervention.
- **Impact:** The severity of impact should the risk materialise.
 - Low: Minimal disruption with limited consequences.
 - Medium: Moderate disruption affecting key processes.
 - High: Significant disruption with severe consequences.

Action Plan

1. DSLs to oversee gen AI implementation from a learner welfare perspective and ensure personal data of learners and staff is protected.
2. Deliver regular training for staff on online safety, AI ethics, and responsible use.
3. Review curriculum offer to identify where gen AI-related issues might be incorporated into learning in relevant and appropriate parts of the curriculum.
4. Establish transparent reporting mechanisms for reporting any safeguarding or wellbeing concerns linked to gen AI, as well as for any data protection incidents that involve personal data.
5. Collaborate with parents and carers to raise awareness about gen AI risks and best practices.
6. Conduct annual reviews of gen AI tools and their impact on learner wellbeing, updating the risk matrix as needed.

Review and Update

The school will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.

Appendix 2 – Staff Use of AI Acceptable Use Agreement

School Policy

Emerging technologies, including Artificial Intelligence (AI), are increasingly integrated into educational settings and the lives of staff and learners. These technologies have immense potential to enhance creativity, promote personalized learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, ethical application and legal compliance.

St Thomas' CE Primary School permits staff to use **Google Gemini** to enrich student learning and streamline administrative tasks.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of AI.
- Staff have a clear understanding of their responsibilities when engaging with AI and emerging technologies in professional and personal contexts.

Acceptable Use Policy Agreement

I understand that I must use AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of AI tools and technologies.
- I will only use AI tools and technologies for purposes authorized by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, students, or parents/carers is only entered into AI systems that have explicit approval and robust security measures in place.
- I will report any AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt AI output.
- I will critically evaluate the outputs of AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight.
- I will communicate professionally and responsibly when using AI systems.

- I will ensure transparency through appropriate attribution where AI has been used.

When engaging with learners:

- I will support learners on the safe, ethical, appropriate and effective use of AI.
- I will use AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the school's systems and resources:

- I will use AI systems in compliance with established security measures and access protocols.
- I will ensure that any AI applications used in teaching or administration are vetted and comply with the school's policies.
- I will ensure generative AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using AI for data analysis or reporting.
- I will ensure I have explicit authorisation when uploading sensitive school-related information into generative AI systems.

Responsibility and Accountability:

- I will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all AI-related activities within and outside of school premises that are connected to my professional responsibilities.