

# Artificial Intelligence (AI) Policy

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# 1. Policy Statement

This is the Artificial Intelligence Policy of Heathcote School Ltd (**the school**). The School recognises that Artificial Intelligence (AI) technologies are becoming increasingly embedded within education, administration and wider society. The School acknowledges that AI has the potential to support teaching, learning, accessibility, inclusion and operational efficiency when used appropriately and safely.

The School's approach to AI is balanced, measured and safeguarding-led. The School believes that the adoption of AI should be purposeful, educationally appropriate and aligned with the School's values, while retaining pedagogical integrity, equity and pupil wellbeing.

The School is committed to ensuring that any use of AI:

- supports and enhances teaching and learning rather than replacing professional judgement;
- promotes safe, ethical and responsible use of technology;
- protects children, staff and families from safeguarding risks;
- complies with data protection and confidentiality obligations;
- supports equality of opportunity and accessibility;
- is age-appropriate and appropriately supervised.

The School recognises that AI technologies continue to develop rapidly and that schools must respond thoughtfully and responsibly to emerging opportunities and risks.

This policy is intended to provide a clear framework for the safe, ethical and responsible use of AI across the School community.

The following School policies, procedures and resource materials are relevant to this policy:

- Safeguarding and Child Protection Policy;
- E-Safety Policy;
- Staff Code of Conduct & Staff Handbook;
- Acceptable Use Agreements, including Acceptable Use of Technology;
- Behaviour Discipline & Exclusion Policy;
- Privacy Notice & Record Retention Policy;
- Curriculum Policies.

## 2. Scope and application

This policy applies to the whole School, including the Early Years Foundation Stage (EYFS).

This policy applies to:

- teaching staff;
- support staff;
- volunteers;
- peripatetic staff;
- governors and proprietors where appropriate;
- pupils.

This policy applies to the use of:

- school-owned devices and systems;
- school Microsoft accounts and Microsoft Copilot;
- school ICT facilities;
- online learning platforms;
- AI-enabled educational software;
- publicly accessible AI tools used for school purposes.

The School recognises that pupils may encounter AI technologies both inside and outside school. This policy is therefore intended to support safe and responsible digital behaviour both within the School environment and beyond.

## 3. Definition of Artificial Intelligence

For the purposes of this policy, Artificial Intelligence (AI) refers to computer systems or software capable of generating, analysing or responding to content, information or tasks in ways that simulate human intelligence.

Examples include:

- generative AI tools such as ChatGPT, Microsoft Copilot and Google Gemini;
- AI image generators;
- AI-powered writing or editing assistants;
- AI features embedded within educational software such as Canva;
- automated transcription, summarisation or translation tools.

## 4. Regulatory framework

This policy has been prepared to meet the School's responsibilities under:

- Education (Independent School Standards) Regulations 2014;
- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Equality Act 2010;
- Children Act 1989;
- Copyright, Designs and Patents Act 1988.

This policy has regard to the following guidance and advice:

- Generative artificial intelligence (AI) in education (Department for Education);
- Keeping children safe in education (DfE);
- Meeting digital and technology standards in schools and colleges (DfE);
- Filtering and monitoring standards for schools and colleges (DfE);
- Information Commissioner's Office (ICO) guidance on AI and data protection;
- UK Council for Internet Safety guidance.
- Using AI in education settings: support materials (Department for Education).

The following School policies, procedures and resource materials are relevant to this policy:

- Safeguarding and Child Protection Policy;
- Online Safety Policy;
- Acceptable Use Agreements;
- Staff Code of Conduct;
- Behaviour Policy;
- Data Protection and GDPR Policy;
- ICT and Network Policies.

## 5. Core Principles

The school's use of AI will be guided by the following principles:

### 5.1 Safeguarding first

The School recognises that safeguarding and pupil wellbeing must remain paramount in all decisions relating to AI.

The School acknowledges that AI technologies may present safeguarding risks including exposure to inappropriate content, misinformation, online manipulation, harmful bias,

deepfakes, cyberbullying and breaches of privacy. The School will therefore ensure that any use of AI is appropriately supervised, monitored and age-appropriate.

## **5.2 Human oversight and professional judgement**

The School recognises that AI should support professional practice and educational delivery rather than replace it.

All staff remain responsible for the accuracy, suitability and appropriateness of any content, communication, planning, assessment or resource produced with the assistance of AI.

AI-generated content must always be reviewed by an appropriate member of staff before use.

## **5.3 Data protection and confidentiality**

The School recognises the importance of protecting confidential and personally identifiable information.

Staff, volunteers, peripatetic staff and pupils must not enter confidential, sensitive or personally identifiable information into publicly available AI systems.

This includes, but is not limited to:

- pupil names;
- parent names;
- staff names;
- contact details;
- safeguarding information;
- SEND information;
- medical information;
- behavioural records;
- assessment information;
- photographs or recordings.

Where possible, information should be anonymised or redacted before being entered into AI systems.

The School name should not be included in prompts submitted to public AI tools unless this is necessary and appropriate for a legitimate educational or operational purpose.

## 5.4 Educational integrity

The School believes that education is fundamentally relational, developmental and grounded in authentic human interaction.

AI should therefore be used in ways that enhance learning, creativity, accessibility and inclusion while preserving independent thinking, critical reasoning and authentic pupil work.

## 5.5 Equity and inclusion

The School recognises that AI may provide opportunities to improve accessibility, support differentiated learning and reduce barriers to participation.

The School will seek to ensure that any adoption of AI supports equality of opportunity and pupil wellbeing.

AI should be used in ways that support accessibility and help reduce opportunity gaps.

The school recognises that AI may assist:

- differentiated learning;
- accessibility needs;
- language support;
- teacher workload reduction;
- resource creation.

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## 6. Acceptable Use by Staff

Staff may use approved AI tools to support professional duties where such use is:

- appropriate;
- proportionate;
- lawful;
- professionally reviewed;
- compliant with this policy.

Permitted examples may include:

- lesson planning support;
- worksheet and quiz generation;
- drafting administrative documents;

- creating differentiated activities;
- generating ideas for assemblies or enrichment;
- producing model examples;
- summarising non-confidential information;
- creating communication drafts;
- accessibility support.

All AI-generated content must be checked for:

- factual accuracy;
- age appropriateness;
- safeguarding suitability;
- bias;
- copyright concerns;
- educational quality.

Staff remain responsible for all materials and communications issued under their name.

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## 7. Prohibited Use by Staff

Staff must not:

- input confidential or identifiable information into public AI tools;
- use AI to make safeguarding decisions;
- rely solely on AI-generated reports or assessments;
- use AI to replace professional judgement;
- generate inappropriate, discriminatory or harmful content;
- use AI in ways that breach copyright or intellectual property rights;
- use unapproved AI applications with pupils;
- upload pupil photographs or recordings into public AI platforms;
- use AI tools that bypass school filtering or monitoring systems.

AI must never be used to:

- create fake communications;
  - impersonate others;
  - generate misleading content;
  - conduct inappropriate surveillance.
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## 8. Use of AI by Pupils

The school recognises that pupils may encounter AI technologies both within and outside school.

Given the age of pupils within the school, pupil use of AI will be:

- limited;
- supervised;
- age-appropriate;
- educationally purposeful.

Children within the Early Years Foundation Stage (EYFS) will not independently access AI systems. Any use of AI-enabled educational tools within EYFS settings will occur only under direct adult supervision and where considered developmentally appropriate.

Pupils may only use AI tools:

- under direct staff supervision;
- using school-approved platforms;
- for clearly defined educational purposes.

Independent or unrestricted pupil access to public generative AI platforms is not permitted during school activities unless specifically authorised.

The school does not permit pupils to use AI:

- to complete work dishonestly;
- to bypass learning tasks;
- to generate harmful or inappropriate content;
- to share personal information;
- to access unapproved online services.

Staff should teach pupils:

- digital literacy;
  - critical thinking;
  - responsible online behaviour;
  - the limitations and inaccuracies of AI systems;
  - online safety awareness.
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## 9. Microsoft Copilot and Approved Systems

The school currently uses Microsoft systems including Microsoft Copilot.

Where AI tools are provided through school-managed platforms with appropriate security and data protection measures, these may be preferred over publicly available tools.

The school may approve additional AI tools where:

- safeguarding risks have been considered;
  - privacy and data protection requirements are met;
  - educational value has been assessed;
  - age appropriateness has been evaluated;
  - leadership approval has been obtained.
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## 10. Safeguarding Considerations

The school recognises the safeguarding risks associated with AI technologies, including:

- exposure to inappropriate content;
- misinformation;
- bias and harmful stereotypes;
- grooming or exploitation risks;
- deepfakes and manipulated media;
- reduced critical thinking;
- online dependency;
- breaches of privacy.

All staff must remain vigilant regarding:

- unusual pupil behaviour online;
- misuse of AI systems;
- inappropriate generated content;
- cyberbullying involving AI;
- fake or manipulated images or messages.

Any safeguarding concerns involving AI must be reported immediately in line with the school's safeguarding procedures.

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## 11. Data Protection and GDPR

The school will ensure that AI use complies with UK GDPR and data protection obligations.

Staff must:

- minimise data sharing;
- avoid entering personal data into public AI systems;
- anonymise information where possible;
- use school-approved systems where available;
- follow school data retention procedures.

Where AI systems process personal data, the school may undertake:

- data protection impact assessments (DPIAs);
- vendor risk assessments;
- safeguarding reviews.

The school reserves the right to restrict or prohibit AI systems that do not meet safeguarding or data protection expectations.

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## 12. Accuracy, Bias and Reliability

AI systems may:

- produce inaccurate information;
- fabricate sources or references;
- reflect societal bias;
- generate misleading or inappropriate responses.

All users must therefore:

- verify AI-generated content;
- apply professional judgement;
- critically evaluate outputs;
- avoid relying solely on AI-generated information.

AI-generated material should never be assumed to be correct.

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## 13. Intellectual Property and Copyright

Users must ensure that AI-generated materials comply with copyright and licensing requirements.

Staff and pupils must not:

- present AI-generated work dishonestly as entirely original;
- breach copyright laws;
- upload copyrighted materials without permission.

Where appropriate, staff should model transparency regarding the use of AI-assisted content.

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## 14. Monitoring and Filtering

The school may:

- monitor usage of school systems;
- restrict access to AI platforms;
- filter inappropriate content;
- review AI-related activity where safeguarding or misconduct concerns arise.

Use of school systems remains subject to the school's existing ICT monitoring and acceptable use policies.

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## 15. Publication and availability

This policy is published on the School website.

This policy is available to parents, staff and pupils on request.

A copy of this policy is available for inspection from the School office during the School day.

Staff, volunteers and peripatetic staff are expected to familiarise themselves with the contents of this policy and comply with its provisions.

## 16. Definitions and interpretation

Where the following words or phrases are used in this policy:

References to AI include generative artificial intelligence systems, machine learning tools and AI-enabled digital platforms.

References to staff include teaching staff, support staff, volunteers, contractors and peripatetic staff working within the School.

References to pupils include all children educated within the School, including those in the Early Years Foundation Stage (EYFS).

References to parents include all natural parents, those with parental responsibility and any individual with day-to-day responsibility for a pupil.

References to publicly available AI systems include AI tools or platforms not fully managed, monitored or controlled by the School.

## **17. Responsibility statement and allocation of tasks**

The Proprietor has overall responsibility for all matters which are the subject of this policy.

The Proprietor recognises that the safe and responsible adoption of AI is a school leadership matter involving safeguarding, data protection, curriculum delivery and online safety.

To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has delegated day-to-day oversight of AI use to the Senior Leadership Team, supported by the Designated Safeguarding Lead (DSL), bursar and IT lead where appropriate.

The Senior Leadership Team is responsible for:

- monitoring the implementation of this policy;
- reviewing emerging risks and opportunities relating to AI;
- considering the approval of AI tools and platforms;
- ensuring appropriate safeguarding oversight;
- ensuring appropriate staff guidance and training;
- reviewing incidents or concerns relating to AI use.

The Designated Safeguarding Lead is responsible for overseeing safeguarding concerns relating to AI, including online safety risks, harmful content, cyberbullying, manipulated media and any misuse involving pupils.

The bursar and IT lead are responsible for supporting the School's approach to:

- filtering and monitoring;
- infrastructure and network security;
- data protection considerations;
- procurement considerations;
- technical oversight of approved systems.

All staff are responsible for ensuring that their use of AI complies with this policy and all related safeguarding, data protection and professional conduct requirements.

## 18. School responsibilities

The School acknowledges that AI technologies are evolving rapidly and that schools must adopt a measured and responsible approach.

The School will seek to ensure that any use of AI:

- is educationally appropriate;
- is consistent with safeguarding responsibilities;
- supports rather than replaces professional judgement;
- promotes pupil wellbeing and inclusion;
- complies with data protection obligations;
- reflects the School's values and ethos.

The School will maintain appropriate filtering, monitoring and supervision arrangements in relation to AI technologies accessed through School systems.

The School will review AI technologies carefully before approving their use within School.

The School recognises that AI-generated content may be inaccurate, biased or inappropriate. The School will therefore ensure that staff understand the importance of verifying and reviewing AI-generated outputs.

The School will seek to develop appropriate AI literacy amongst staff and, where age-appropriate, pupils, so that users understand both the opportunities and limitations of AI technologies and can engage with them safely, responsibly and critically.

## 19. Staff responsibilities

The School recognises that all staff have a responsibility to model safe, responsible and professional use of technology.

Staff may use approved AI systems to support teaching, learning and administration where such use is appropriate, proportionate and professionally supervised.

Staff remain fully responsible for all content, decisions and communications produced with the assistance of AI.

AI may assist with drafting reports, feedback, assessment materials, policies, communications and administrative documents. However, responsibility for the accuracy, appropriateness, professional judgement and final content of such documents remains with the member of staff responsible for them.

Staff must ensure that:

- AI-generated content is checked for accuracy and appropriateness;
- confidential information is not entered into public AI systems;
- safeguarding concerns are reported in accordance with School procedures;
- pupils are appropriately supervised when using AI-enabled systems;
- AI is not used in a way that undermines authentic learning.

Staff must not rely solely on AI-generated information when making professional judgements relating to safeguarding, assessment, behaviour, SEND provision or pupil wellbeing.

## 20. Pupil responsibilities

The School recognises the importance of teaching pupils to engage with technology safely, responsibly and critically.

Pupils are expected to:

- follow staff instructions regarding the use of AI tools;
- use technology respectfully and safely;
- avoid accessing unapproved AI platforms;
- avoid using AI dishonestly or in ways that undermine learning;
- report concerns or inappropriate content to a member of staff.

The School recognises that pupils of primary age require high levels of supervision and guidance when engaging with online technologies.

Accordingly, pupil use of AI systems within School will remain limited, supervised and age-appropriate.

## 21. Parent responsibilities

The School recognises the importance of working in partnership with parents to promote safe and responsible use of technology.

Parents are encouraged to:

- support the School's expectations regarding online safety and appropriate technology use;
- reinforce age-appropriate boundaries regarding AI and online platforms;
- communicate concerns to the School;
- encourage balanced and healthy use of digital technology.

## 22. Staff training

The School ensures that appropriate guidance and training relating to AI use is provided to staff and volunteers.

The School may utilise Department for Education AI support materials and other approved professional development resources to support staff understanding of the safe, effective, ethical and educationally appropriate use of AI technologies.

Training may include:

- safeguarding considerations;
- data protection and confidentiality;
- responsible use of generative AI;
- risks and limitations of AI systems;
- educational applications of AI;
- online safety considerations.

The School recognises that AI technologies continue to evolve rapidly and staff are therefore expected to remain aware of emerging risks, guidance and expectations.

## 23. Breaches of policy

Breaches of this policy may result in:

- restriction of access to School systems;
- disciplinary action;
- safeguarding investigation;
- referral under relevant School procedures.

Serious breaches involving safeguarding, unlawful conduct or data protection concerns may be referred externally where appropriate.

## 24. Policy review

This policy will be reviewed annually or more frequently where necessary to reflect changes in legislation, safeguarding guidance, Department for Education guidance, technological developments or operational practice.

This policy will be reviewed annually, or sooner where:

- technology developments require;
- legislation changes;
- safeguarding guidance changes;
- operational concerns arise.

# Appendix A – Staff Guidance for Safe AI Use

## Staff should:

- use AI to support efficiency, not replace professional judgement;
- verify all outputs;
- use clear professional oversight;
- anonymise information;
- use school-approved systems where possible;
- consider age appropriateness;
- maintain safeguarding awareness.

## Staff should not:

- upload identifiable information;
- rely on AI-generated safeguarding advice;
- use AI to write reports without review;
- generate content without checking accuracy;
- use AI in ways that undermine authentic learning.

## Good Practice Examples

### Appropriate

- generating spelling activities;
- drafting assembly ideas;
- simplifying text for accessibility;
- creating quiz questions;
- brainstorming lesson starters.

### Inappropriate

- uploading SEND records;
- entering parent complaints into AI systems;
- generating disciplinary decisions;
- using AI to monitor pupils secretly;
- allowing unrestricted pupil AI access.

## Appendix B – Guidance for Pupils

Pupils should:

- only use AI tools when instructed by staff;
- use technology safely and respectfully;
- tell a teacher if something online makes them uncomfortable;
- think critically about online information.

Pupils should not:

- share personal information online;
- use AI to cheat;
- access unapproved websites;
- create unkind or inappropriate content.

## Appendix C – AI Risk Assessment Considerations

Before adopting new AI tools, the school should consider:

- safeguarding suitability;
- age appropriateness;
- data storage location;
- GDPR compliance;
- moderation controls;
- filtering compatibility;
- accessibility benefits;
- educational value;
- staff supervision requirements;
- vendor reputation.

## Appendix D – Approved and Restricted AI Use

### Currently Approved

- Microsoft Copilot through school-managed systems;
- approved AI features within educational platforms such as Canva, under staff supervision.

### Restricted or Prohibited

- unrestricted pupil use of public generative AI tools;
- AI tools requiring personal accounts for pupils;
- AI platforms not approved by school leadership;
- use involving confidential or safeguarding information.

## Appendix E – Example Acceptable AI Prompting Guidance

When using AI systems, staff should:

### Avoid

“Write a report about John Smith in Year 4 who has autism and behavioural difficulties.”

### Instead Use

“Create a supportive and professional primary school report paragraph for a pupil who benefits from encouragement with focus and organisation.”

## Appendix F – Statement on Educational Philosophy

The school believes that education is fundamentally relational, developmental and grounded in human interaction.

AI should therefore support — but never replace — the expertise of teachers, the importance of critical thinking, or the pastoral care central to the life of the school.

The school will continue to prioritise:

- high-quality teaching;
- authentic learning experiences;
- creativity;
- pupil wellbeing;
- equity of opportunity;
- safe and responsible digital citizenship.

AI adoption within the school will remain purposeful, measured and aligned with the school's educational values.