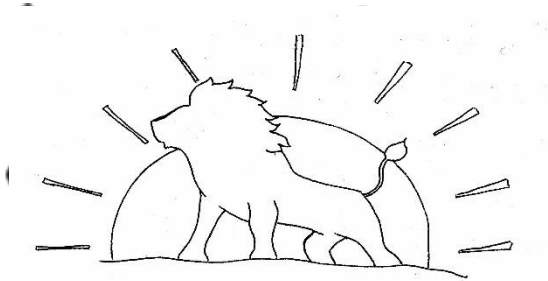


# Artificial Intelligence Policy

## Northwick Park MAT



...working together

Northwick Park Primary and Nursery  
We Take Pride

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Approved by: LGBS

Date: September 2024

Next Review Date: June 2026 or as technology changes

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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 grow exponentially, impacting almost all industries and job sectors including education. 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 is a rapidly evolving and increasingly freely available technology generating writing, audio, codes, images and video simulations.
- 1.2. AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. This policy establishes guidelines for the responsible and effective use of AI within our Trust and Trust Schools.. By embracing AI technology, we aim to:
  - Enhance academic outcomes and educational experiences for pupils
  - Support teachers in managing their workload more efficiently and effectively
  - Educate staff and pupils about safe, responsible and ethical AI use
  - 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
  - Improve and streamline school operations to minimise cost and maximise efficiency.
- 1.3. All users of AI will comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts their safety or privacy at risk. Staff will not allow or cause intellectual property, including pupils' work, to be used to train Generative AI models without appropriate consent or exemption to copyright.
- 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 leadership in the education sector provided by the Department of Education and the guidance set out in their [Statement on Generative Artificial Intelligence in Education](#). (Appendix 2) This AI policy has been informed by that guidance. As guidance and technology changes the policy therefore will need to remain under regular review. This policy will therefore be reviewed annually.
- 1.5. We will be transparent and accountable about the use of AI technology so that stakeholders, including staff, pupils, parents, Governors and other partners understand where and how AI is used and who is responsible. Any stakeholder feedback or questions about the use of AI will 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 all staff, including temporary staff, consultants, governors, volunteers, and contractors, and anyone else working on behalf of the Trust. It is also applicable to pupils, but this group will require support and guidance from staff as part of their learning.

- 2.2. All staff are responsible for reading and understanding this policy before using any AI technology. It is not expected that staff use AI in performing their duties and fulfilling their roles, but it is imperative that they adhere to this policy should they decide to do so.
- 2.3. 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.
- 2.4. There are a number of staff in the school who are key contributors to AI policy and development:
  - The Computing Lead 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.
  - Our Data Protection Officer is responsible for advising us about our data protection obligations in relation to AI use.
  - The CEO, Heads of School and Computing Governor will be responsible for the Governance of AI.
- 2.5. 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.
- 2.6. This policy also links to other school policies, including the Child Protection and Safeguarding, Data Protection and IT Security and Acceptable Usage and should be read in conjunction with them.

### 3. Use of AI by Staff

- 3.1. Staff are permitted to explore and utilise AI-based tools and technologies to assist in managing their work. Examples of such tasks may include marking and feedback, report writing, lesson planning, professional development and facilities management. AI can provide valuable support while still incorporating professional judgment and expertise.
- 3.2. AI tools will be used responsibly, ensuring they complement staff professional judgment and expertise, without replacing them.
- 3.3. Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used.
- 3.4. Staff will be responsible for effectively integrating AI into their work including professional development opportunities focused on AI tools and their effective integration into school administrative and teaching practices. Training and support will be planned 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.
- 3.5. AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised activities, generating extension tasks or scaffolded work, and identifying potential

knowledge gaps. For instance, AI-based 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 pupil learning objectives are met.

- 3.6. Teaching staff can use 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 will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.
- 3.7. Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out.

## 4. Use of AI by Pupils

- 4.1. As part of child protection and safeguarding policies and processes, the school will ensure that its pupils will continue to be protected from harmful content online, including that which may be produced by AI technology and that any AI tools used 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.
- 4.2. Pupils may be permitted to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis, and creative expression. This is yet to be established within the school and this policy will be updated prior to any AI-based work being added to the Curriculum.
- 4.3. A culture of responsible AI use will be fostered through engaging pupils in conversations about data privacy, bias, safeguarding, and the social impact of AI applications.
- 4.4. Pupils will be taught not to enter personal, sensitive or confidential data into Generative AI tools [including their email addresses] as part of our Online Safety teaching.
- 4.5. 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. This will be discussed by staff with the Computing Lead and SLT before use

## 5. Potential Misuse of AI

- 5.1. 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 will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.
- 5.2. Teaching staff will 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 will be communicated to pupils regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.
- 5.3. Teaching staff will 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 strategies, teaching staff can verify pupils' comprehension beyond what AI tools can assess, promoting deep learning and authentic pupil engagement.

## 6. Ethical Use of AI

- 6.1. The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Whether staff are using 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:
  - 6.1.2. 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.
  - 6.1.3. Accuracy – information may be inaccurate when generated so any content should be fact-checked.
  - 6.1.4. Currency – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

## 7. Data Protection implications of using AI

Staff and pupils should be aware that any information entered into a Generative AI model is no longer private or secure. Staff and pupils must not enter any personal information (personal data, intellectual property or private information (including commercially sensitive information, such as contracts) into any Generative AI model. Staff should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

- 7.2 Staff who wish to utilise AI tools must 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 Process. This needs to be discussed with the Data Protection Officer (Tracy Smith) before any use of AI is undertaken for anything related to school or Trust.
- 7.3. 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.
- 7.4. Any DPIA or assessment of the data protection aspects of the use of AI will 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.
  - 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.
  - If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
  - 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 postcode 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.

## 8. Cyber security

8.1. Our school will 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 the headteacher or a member of SLT and the Data Protection Officer.
- Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will 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.

## **Appendix 1: Glossary of Terms**

**Artificial Intelligence:** Artificial intelligence (AI) refers to technology that can make computers learn and have human-like intelligence. A machine can be programmed to perform human-like tasks, based on the information it takes from its surroundings and from previous experience. AI is able to process language, learn and problem-solve.

**Bias:** Some information on the Internet is influenced by the opinion of the creator and is therefore biased.

**Copyright:** A law that prevents people from copying the creative work of others without their permission.

**Generative AI:** Generative AI is a tool that can create text, images or videos based on the input it receives.

**Stakeholders:** People who are involved in the setting, such as staff, students, parents and governors.



# Generative artificial intelligence (AI) in education

Updated 26 October 2023

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## Contents

[Understanding generative AI Opportunities for the education sector Using AI effectively](#)

[Protecting data, pupils and staff Formal assessments](#)

[Knowledge and skills for the future](#)

This document sets out the position of the Department for Education (DfE) on the use of generative artificial intelligence (AI), including large language models (LLMs) like ChatGPT or Google Bard, in the education sector.

This statement:

- is informed by the government's white paper on a [pro-innovation approach to AI regulation \(https://www.gov.uk/government/publications/ai-regulation-a-pro- innovation- approach\)](https://www.gov.uk/government/publications/ai-regulation-a-pro- innovation- approach)
- follows the government's announcement to set up an expert [Frontier AI Taskforce \(https://www.gov.uk/government/publications/frontier-ai-taskforce-first- progress-report\)](https://www.gov.uk/government/publications/frontier-ai-taskforce-first- progress-report) to help the UK adopt the next generation of safe AI

## Understanding generative AI

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. ChatGPT and Google Bard are generative artificial intelligence (AI) tools built on large language models (LLMs).

Tools such as ChatGPT and Google Bard can:

- answer questions
  - complete written tasks
  - respond to prompts in a human-like way
- Other forms of generative AI

can produce:

- audio
- code
- images
- text
- simulations
- videos

AI technology is not new and we already use it in everyday life for:

email spam filtering  
media recommendation systems navigation apps  
online chatbots

However, recent advances in technology mean that we can now use tools such as ChatGPT and Google Bard to produce AI-generated content. This creates opportunities and challenges for the education sector.

## Opportunities for the education sector

Generative AI tools are good at quickly:

- analysing, structuring, and writing text
- turning prompts into audio, video and images

When used appropriately, generative AI has the potential to:

- reduce workload across the education sector
  - free up teachers' time, allowing them to focus on delivering excellent teaching

However, the content produced by generative AI could be:

- inaccurate
- inappropriate • biased
- taken out of context and without permission
- out of date or unreliable

## Using AI effectively

Teacher workload is an important issue and we are committed to helping teachers spend less time on non-pupil facing activities.

We are working with the education sector and with experts to identify opportunities to improve education and reduce workload using generative AI.

Having access to generative AI is not a substitute for having knowledge in our long-term memory. To make the most of generative AI, we need to have the knowledge to draw on.

We can only:

- learn how to write good prompts if we can write clearly and understand the domain we are asking about
- sense-check the results if we have a schema against which to compare them

Generative AI tools can make certain written tasks quicker and easier, but cannot replace the judgement and deep subject knowledge of a human expert. It is more important than ever that our education system ensures pupils acquire knowledge, expertise and intellectual capability.

The education sector should:

- make the most of the opportunities that technology provides

- use technology safely and effectively to deliver excellent education that prepares pupils to contribute to society and the future workplace

## The limitations of generative AI tools

Generative AI tools can produce unreliable information, therefore any content produced requires professional judgement to check for appropriateness and accuracy.

Generative AI:

- returns results based on the dataset it has been trained on – for example, a generative AI tool may not have been trained on the English curriculum
- may not provide results that are comparable with a human-designed resource developed in the context of our curriculum

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 and the organisation they belong to.

Schools and colleges may wish to review homework policies and other types of unsupervised study to account for the availability of generative AI.

Higher education institutions may wish to review the [intellectual asset management guide \(https://www.gov.uk/government/publications/intellectual-asset-management-for-universities\)](https://www.gov.uk/government/publications/intellectual-asset-management-for-universities) in regards to developing student policies on the IP they create, and how they interact and use IP of others in light of generative AI use.

## Protecting data, pupils and staff

Generative AI:

- stores and learns from the data it is given – any data entered should not be identifiable
- can create believable content, including more credible scam emails requesting payment – people interact with generative AI differently and the content may seem more authoritative and believable

Schools and colleges should:

- protect personal and special category data in accordance with data protection legislation
- not allow or cause intellectual property, including pupils' work, to be used to train generative AI models, without appropriate consent or exemption to copyright
- review and strengthen their cyber security by referring to the [cyber standards](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges) (<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>) – generative AI could increase the sophistication and credibility of attacks
- ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through generative AI - [keeping children safe in education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2) (<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>) provides schools and colleges with information on:
  - what they need to do to protect pupils and students online
    - how they can limit children's exposure to risks from the school's or college's IT system
- refer to the [filtering and monitoring standard](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges) (<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>) to make sure they have the appropriate systems in place

Find out more on:

- [ChatGPT and LLMs: what's the risk](https://www.ncsc.gov.uk/blog-post/chatgpt-and-large-language-models-whats-the-risk) (<https://www.ncsc.gov.uk/blog-post/chatgpt-and-large-language-models-whats-the-risk>)
- the [principles for the security of machine learning](https://www.ncsc.gov.uk/collection/machine-learning) (<https://www.ncsc.gov.uk/collection/machine-learning>)

## Data privacy

It is important to be aware of the data privacy implications when using generative AI tools, as is the case with any new technology. Personal and special category data must be protected in accordance with data protection legislation.

If it is strictly necessary to use personal and special category data in generative AI tools within their setting, the education institution must ensure that the products and procedures comply with data protection legislation and their existing data privacy policies to protect the data.

Education institutions should also be open and transparent, ensuring the data subjects (pupils) understand their personal or special category data is being processed using AI tools.

Find out more about:

- [personal data](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/personal-information-what-is-it/what-is-personal-data/what-is-personal-data/) (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/personal-information-what-is-it/what-is-personal-data/what-is-personal-data/>)
- [special category data](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful) (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful>)

[basis/special-category -data/what-is-special-category -data/\)](#)

## Intellectual property

Most generative tools will use the inputs submitted by users to further train and refine their models.

However, pupils own the intellectual property (IP) rights to original content they create. Original content is likely to include anything that shows working out or is beyond multiple choice questions. Intellectual property can only be used to train AI if there is consent from the rights holder or an exemption to copyright applies.

Some tools allow users to opt out of inputs being used to train the models.

Education institutions must not allow or cause pupils' original work to be used to train generative AI models unless they have appropriate consent or exemption to copyright. Consent would need to be from the student if over 18, and from their parent or legal guardian if under 18.

Exemptions to copyright are limited, and education institutions may wish to take legal advice to ensure they are acting within the law.

## Formal assessments

Schools, colleges, universities and awarding organisations need to continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI.

The Joint Council for Qualifications has published guidance on [AI use in assessments \(https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/\)](https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/) to support teachers and exam centres in protecting the integrity of qualifications.

This guidance includes information on:

- what counts as AI misuse
- the requirements for teachers and exam centres to help prevent and detect malpractice

## Knowledge and skills for the future

To harness the potential of generative AI, students will benefit from a knowledge-rich curriculum which allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge ensures students are developing the right skills to make best use of generative AI.

The education sector needs to:

- prepare students for changing workplaces
  - teach students how to use emerging technologies, such as generative AI, safely and appropriately

At different stages of education, this teaching may include:

- the limitations, reliability, and potential bias of generative AI
- how information on the internet is organised and ranked
- online safety to protect against harmful or misleading content
- understanding and protecting IP rights
- creating and using digital content safely and responsibly
- the impact of technology, including disruptive and enabling technologies
  - foundational knowledge about how computers work, connect with each other, follow rules and process data

The [Office for AI \(https://www.gov.uk/government/organisations/office-for-artificial-intelligence\)](https://www.gov.uk/government/organisations/office-for-artificial-intelligence) is currently conducting research into the skills that will be needed for future workforce training.

The education system should:

- support students, particularly young pupils, to identify and use appropriate resources to support their ongoing education
- encourage effective use of age-appropriate resources (which, in some instances, may include generative AI)
- prevent over-reliance on a limited number of tools or resources DfE will continue to work with

experts to:

consider and respond to the implications of generative AI and other emerging technologies

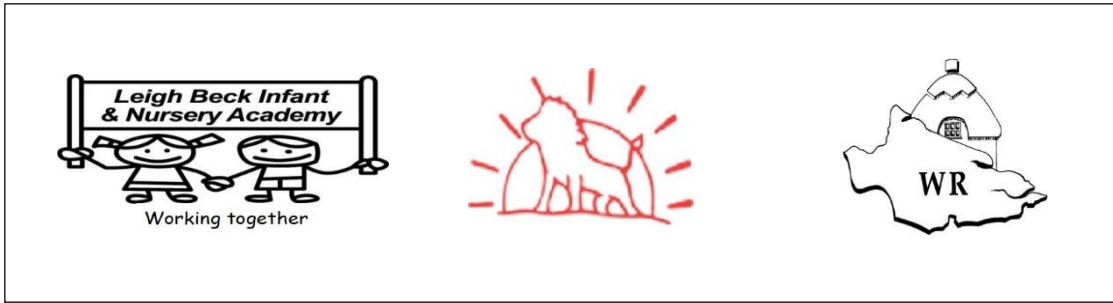
support primary and secondary schools to teach a knowledge-rich computing curriculum to children up to the age of 16



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## Appendix 3:



## Generative Artificial Intelligence Policy

When using generative Artificial Intelligence (AI) it is important that our school ensures we are able to maximise the benefits of AI while minimising any risks or concerns.

This policy sets out the rules all employees, voluntary workers, agency staff, contractors, and other third parties working on behalf of the school **must** follow when using generative AI.

### Policy rules

1. You must only use AI applications authorised by our school.
2. You must select the opt-out option before first use of authorised AI applications. This will prevent the data you enter into the prompt being used by the Large Language Model (LLM) to train itself. If the opt out selection is unclear or is not available on the authorised AI application, please contact the school Data Protection Lead for further clarification.
3. When using any of the authorised AI applications, you must use your work email address for log-in purposes.
4. Before using an AI application you must have authorisation from the schools Data Protection Lead.
5. When using AI applications you must ensure that confidential, sensitive, or proprietary employee, student, parent/carer or third-party supplier, including personal data or sensitive data, is **not** entered into the application as a prompt in breach of data protection legislation.
6. If your use of AI applications will involve any personally identifiable data you **must** complete a Data Protection Impact Assessment (DPIA) and where necessary an Equalities Comprehensive Impact Assessment (ECIA), both approved by the school prior to any use.
7. If your use of AI applications will involve any personally identifiable data you must ensure that your privacy notices explain your use of AI and explain how AI decisions are made
8. You must be aware of, and comply with, any intellectual property rights (IPR) or licencing conditions and include referencing of your sources when using AI tools.
9. You must not input offensive, discriminatory or inappropriate content as a prompt.
10. You must comply with our Information Security and Data Protection Policies when using AI applications or any other technologies.
11. You must carefully review any AI outputs to guard against bias, inappropriate or offensive data.
12. You must not generate content to impersonate, bully, or harass another person, or to generate explicit or offensive content.



## Why must I comply with these policy rules?

These policy rules will help us to comply with the law and regulatory guidance when using artificial intelligence. The use of generative artificial intelligence (generative AI) is transforming the way individuals are working. Informed and responsible use of generative AI has the potential to increase efficiency in the workplace, improve decision making and foster innovation. With these benefits come potential risks, including data protection breaches, copyright issues, the protection of confidential information, ethical considerations and compliance with wider legal obligations. AI systems learn based on the information you enter. Just as you would not share work documents on social media sites, do not input such material into generative AI tools.

### Common Generative AI types

**Rule-based AI** - The AI follows specific rules and guidelines to make decisions or generate language. Very specific AI tools are used in healthcare, finance, customer services, and other industries. These are used in disease detection, drug development, fraud detection and investment monitoring.

**Machine learning AI** - This type of AI can write reports, summarise documents and help you create policies. Over time, this AI gets better at predicting or making decisions based on the data it has seen. It's more flexible than rule-based AI but still has limitations and what it creates must be checked.

**Deep learning AI** - Deep learning AI can recognise patterns and make decisions with less explicit programming compared to traditional machine learning.

**Natural Language Processing (NLP) AI** - This AI specializes in understanding and generating human language. NLP AI can read text, understand it, generate responses, and sometimes even understand sentiment and context.

**Reinforcement learning AI** - This AI learns by trial and error, receiving rewards for good decisions and penalties for bad ones.

**Image generating AI** - This is AI can create images from text inputs for use in marketing and communications material.

**Minute taking AI** – There are AI tools which can be used to take minutes of meetings. These tools can become incredibly intrusive and hard to get rid of as they often invite themselves to meetings and take minutes of meetings which are not intended to be minuted.

**Vision processing AI** – Recognises faces and makes decisions based on who they see. Used in facial recognition solutions for access and safety.

**Robotics AI** – AI is integrated into physical machines and industrial robots, drones and autonomous vehicles.

**Recommendation systems AI** - It bases the recommendations on your activity and that of other people whom it sees as similar to you, e.g., chatbots.

The tools above are large learning models (LLMs) and most can generate human like text in response to a prompt. They use deep learning techniques and massive data volumes to generate a response. LLMs can produce outputs which may initially appear to be believable but are in fact highly inaccurate or fabricated. This is known as a hallucination. AI needs personal data for training the LLM so it can mimic human behaviour, and lots of it to improve accuracy. Currently there are no reliable techniques for steering the behaviour of LLMs which are very complex to understand. This increases data protection risks as well as the risk of unconscious bias. AI applications must be used ethically and responsibly to avoid harm, reputational damage, unlawful processing and regulatory censure.

### Governance

It is essential that we complete due diligence checks on any AI application the business are considering using

to ensure it meets ethical and legal conditions, reducing risks for the business and individuals. AI platforms can involve collaboration between multiple parties or use third-party tools and services. This increases the risk of unauthorised access or misuse of personal data, especially when data is shared across jurisdictions with different privacy regulations.

You must always comply with our Code of Conduct and our Policies and consider the need to complete an Equalities Comprehensive Impact Assessments (ECIAs).

### **Security of information**

Every employee is responsible for assuring the security of any processing by the school. AI can be misused for malicious purposes, such as automating cyberattacks or creating sophisticated phishing scams. Attackers can leverage AI to launch more targeted and efficient attacks, making it harder for traditional security measures to detect and mitigate them. You must be vigilant and ensure that all technical and organisational controls are complied with to fully protect the data.

Since generative AI models take unstructured prompts from users and generate new, possibly unseen responses, you need to protect personal or sensitive data in-line. Many known prompt-injection attacks have been seen in the wild. The main goal of these attacks is to manipulate the model into sharing unintended information.

### **Verifying outputs**

Generative AI has the potential to produce inaccurate outputs or hallucinations. There is also a risk that the output is biased, inappropriate or otherwise offensive. This means that critical thought must be applied to all outputs of authorised AI applications; they must always be fact and sense checked before being relied upon for business purposes and reviewed to ensure content is appropriate. These tools can produce credible looking output. They can also offer different responses to the same question if it is posed more than once, and they may derive their answers from sources you would not trust in other contexts. Therefore, be aware of the potential for misinformation from these systems.

### **How must I comply with these policy rules?**

You cannot use AI applications without first seeking and gaining written permission from the school Data Protection Lead. You must select the 'opt out' option, and if one is not available, seek advice from the school Data Protection Lead. You must fully comply with policy and guidance to protect data from cyber threats, reducing risks for individuals and the organisation. You must always use your work assigned email address to enable clarity that AI use has been approved by the business.

To assess the data protection risks of proposed uses of AI applications you must complete a DPIA. Any identified risks must be mitigated to an acceptable level before the DPIA can be approved and the use of AI commenced. Where AI involves the use of personal data you must be able to inform individuals of their data protection rights and how to exercise them. Your privacy notices must be clear if AI activities including the use of personal data. In addition you should provide explanations to data subjects of the process, fairness, outcome and impact to reassure data subjects and enable and inform challenges. The ICO provide [guidance](#) on how to ensure you meet data subjects rights when using AI.

You must read and apply the [DfE guidance](#) for education sector on the use of generative artificial Intelligence.

Identify and abide by any relevant licensing conditions regarding intellectual property rights in the authorised AI application's terms of use and ensure that third party proprietary data or material is not entered into the application as a prompt without the third party's permission. This includes ensuring, for example, that all or any substantial part of any copyright work owned by a third party is not inputted into the

application as a prompt without the third party's consent. Records of checks for copyright, or licencing information, must be evidenced. Whether using the outputs from generative AI either verbatim or with minor alterations, it is important to make clear to those reading that an AI tool has been used. To do this the tools should be cited in a footnote, with its URL and any sources used as inputs.

AI tools, such as a LLM, answer questions by choosing words from a series of options it classifies as plausible. These tools cannot understand context or bias. Always treat with caution the outputs these tools produce and challenge the outputs using your own knowledge and judgement. Outputs must always be fact and sense checked before being relied upon for business purposes and reviewed to ensure content is appropriate. Always apply the high standards of rigour you would to anything you produce, and reference where you have sourced output from in one of these tools.

Remember that under the UK GDPR data subjects have the right to object to automated decision making and profiling. You must make clear in your privacy notice that AI is being used, and that the data subject has the right to object, and how to do so. You must have processes in place to manage any objections

Always use authorised AI applications ethically and responsibly, taking into account our policies and research governance.

We reserve the right to monitor all content (including but not limited to any prompts, or outputs) on any generative AI application used for school purposes. This will only be carried out to the extent permitted by law, in order for us to comply with a legal obligation or for our legitimate business purposes, including but not limited to:

- a) prevent misuse of the content and protect our confidential information (and the confidential information of our staff, students, parent/carers and suppliers);
- b) ensure compliance with our rules, standards of conduct and policies;
- c) monitor performance at work;
- d) ensure that our workforce does not use our facilities or systems for any unlawful purposes or activities that may damage our school or reputation;
- e) comply with legislation for the protection of intellectual property rights and to support proprietary rights in the output.

### **What if I need to do something against this policy?**

If you believe you have a valid business reason for an exception to these policy points, having read and understood the reasons why they are in place, please raise a formal request by contacting the school Data Protection Lead.

If you believe the policy does not meet your business needs, you may raise this with your school Data Protection Lead who, if they agree with your suggestion, may propose a policy change.

### **References**

- Data Protection Act 2023/ UK GDPR
- The Intellectual Property Act 2014
- Human Rights Act 1998
- [Generative artificial intelligence \(AI\) in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education)
- [Guidance to Civil Servants on use of generative AI](#)
- [Our work on Artificial Intelligence | ICO](#)
- [ICO – Explaining Decisions made with AI](#)

- [NASUWT | Artificial Intelligence and Digital Technologies](#)
- [EU AI Act 2024](#)
- ePrivacy legislation
- Education legislation
- Marketing legislation

**Breach Statement**

Breaches of Information Policies will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.

**Document Control**

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