



**Broxbourne CE Primary School, EYFS & Extended Schools
(Voluntary Aided)**

Artificial Intelligence Policy

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Signed Chair of Governors	

Dream, Believe and Achieve with God

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1. Aims and Scope

At Broxbourne CE 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, adapt learning content to meet the needs of individual children, use of data analytics to identify children at risk of falling behind, enable early intervention and allow staff more time to focus on teaching and interaction.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, bias, use of intellectual property, misuse of technology, 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 covers the use of AI tools by school staff, governors and children. This includes generative chatbots such as ChatGPT, TeachMateAI, Claude, Google Gemini and Microsoft Copilot (please note, this list is not exhaustive).

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
- Provide clear guidelines for staff on the safe and effective use of AI
- Promote the safe and ethical use of AI to benefit teaching, learning, leadership, management and administrative processes.
- Encouraging a culture of continuous learning and adaptation to new AI technologies; this includes ongoing professional development opportunities and staying informed about the latest advancements in AI
- Promote equity in education by using AI to address learning gaps and provide personalised support.
- Addressing potential challenges related to data privacy, bias and security that the use of AI may raise
- Protect the privacy and personal data of staff, governors and children in compliance with the UK GDPR
- Prepare staff, governors and children for a future in which AI technology will be an integral part.

2. Definitions

- **Artificial Intelligence (AI):** refers to the use of computer systems and algorithms to perform tasks that typically require human intelligence.
- **Open generative AI tools** are accessible and modifiable by anyone. They may store, share or learn from the information entered into them, including personal or sensitive information

- **Closed generative AI tools** are generally more secure, as external parties cannot access the data you input
- **Machine Learning (ML):** ML algorithms allow systems to learn from data and improve their performance over time. For example, ML may be used in personalised learning platforms that adapt content based on pupil progress, or systems where personalised recommendations are made, based on a user's prior activity on that platform.
- **Personal Data:** Information collected that relates to an identified or identifiable living person. This may include, but is not limited to, name, date of birth, location data, online identifiers, photographs and address.
- **Ethical Use:** Using AI and data in a way that respects individuals rights, promotes fairness and prevents discrimination.

3. Legislation

This policy reflects good practice guidelines/recommendations in the following publications:

- [AI regulation white paper](#), published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence
- [Generative artificial intelligence \(AI\) and data protection in schools](#), published by the Department for Education (DfE)
- 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 \(DPA 2018\)](#)

4. Regulatory principles

We follow the 5 principles set out in the [AI regulation white paper](#).

REGULATORY PRINCIPLE	WE WILL ...
Safety, security, and robustness	<ul style="list-style-type: none"> • Ensure that AI solutions are secure and safe for users and protect users' data. • Ensure we can identify and rectify bias or errors. • Anticipate threats such as hacking
Appropriate transparency and explainability	<ul style="list-style-type: none"> • Be transparent about our use of AI, and make sure we understand the suggestions it makes

REGULATORY PRINCIPLE	WE WILL ...
Fairness	<ul style="list-style-type: none"> • Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate
Accountability and governance	<ul style="list-style-type: none"> • Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance, and use of AI
Contestability and redress	<ul style="list-style-type: none"> • Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology. • Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment

5. Roles and responsibilities

5.1 AI Lead

Our generative AI Lead is our Computing Lead. They are responsible for the day-to-day leadership, ownership, and management of AI use in the School.

5.2 Governing Body

The Governing Body will:

- Take overall responsibility for monitoring this policy and holding the Headteacher to account for its implementation in line with the school's AI strategy.
- Ensure the Headteacher and AI Lead are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school.
- Adhere to the guidelines below to protect data when using generative AI tools:
 - Use only approved AI tools (see section 6)
 - Seek advice from the data protection officer / IT / AI Lead, as appropriate.

- Check whether they are using an open or closed generative AI tool.
- Ensure there is no identifiable information included in what they put into open generative AI tools.
- Acknowledge or reference the use of generative AI in their work.
- Fact-check results to make sure the information is accurate.

5.3 Headteacher

The Headteacher will:

- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation.
- 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 children are taught about the effective use and potential risks of AI.
- Sign off on approved uses of AI, or new AI tools, considering advice from the DPO, AI Lead, and data protection impact assessments.

5.4 Data Protection Officer (DPO)

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 Mrs. Janet Boguzas, and our Deputy Data Protection Officer is Miss Mary Jaques. They are contactable via dpo@broxbourne-pri.herts.sch.uk.

5.5 Safeguarding Lead

The Safeguarding Lead is responsible for monitoring and advising us 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 Keeping Children Safe in Education (KCSIE)

5.6 All staff

As part of our aim to reduce staff workload while improving outcomes for our children, 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 6)

- Seek advice from the data protection officer / Computing & AI Lead, as appropriate.
- Check whether they are using an open or closed generative AI tool.
- Ensure there is no identifiable information included in what they put into open generative AI tools.
- 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 our children understand the potential benefits and risks of using AI in their learning. All our staff have a responsibility to guide our children in critically evaluating AI-generated information and understanding its limitations.

5.7 Children

Children must:

- Follow the guidelines set out in section 8 of this policy ('Use of AI by children')

6. Staff and governors use of AI

6.1 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.

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.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it.

Always consider whether AI is the right tool to use. Just because the school has approved its use does not mean it will always be appropriate.

Approved tools	Approved uses
Chat GPT / Teachmate AI / Claude / Gemini / Copilot	<ul style="list-style-type: none"> • Topic information • Lesson resources • Lesson planning • Presentations • Assembly planning • Generating example targets based on described needs eg for SEND • Writing tools eg model texts

	<ul style="list-style-type: none"> • Social media content • Generating reports • Letter to parents/carers
Oak Academy AI lesson planner	<ul style="list-style-type: none"> • Lesson planning • Lesson resources • Differentiation options • Quizzes to ensure understanding
KeyGPT	<ul style="list-style-type: none"> • Letter to parents/carers • Job descriptions and adverts • Interview questions
Arbor AI	<ul style="list-style-type: none"> • Producing emails • Writing letters • Generating reports
Canva	<ul style="list-style-type: none"> • Lesson resources • Presentations • Newsletters

This list shows the main platforms currently used. This list is not exhaustive and is subject to change as this field is developed further.

6.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve the outcomes of the children and reduce workload. Staff should contact the Headteacher to discuss any ideas they may have with regards to using AI, so the Headteacher can take the suggestions forward if they deem it to be a satisfactory new method of working.

The Headteacher is responsible for signing off on approved uses of AI, or new AI tools, considering advice from the AI Lead, the DPO and data protection impact assessments.

6.3 Data protection and privacy

The School ensures that all personal data collected from children, staff and parents, including data processed by AI tools, is handled in accordance with the UK GDPR principles. Data Protection Impact Assessments (DPIAs) are carried out on AI tools that process personal data.

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, this will be treated as a data breach and will follow the personal data breach procedure outlined in our data protection policy.

6.4 Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Children own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

Staff must not use children's work to train generative AI models without appropriate consent or exemption to copyright.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

6.5 Bias

AI systems can inadvertently perpetuate biases present in the data they are trained on. The School will take proactive steps to identify and mitigate these biases to ensure fairness and non-discrimination. This may include conducting regular audits and implementation of fairness checks. This also means fact and sense-checking the output before relying on it.

Broxbourne CE Primary School 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 children have any concerns or complaints about potential unfair treatment or other negative outcomes because of AI use, these will be dealt with through our usual complaints procedure.

6.6 Raising concerns

We encourage all members of our school community to speak to the Headteacher in the first instance if they have any concerns about the proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

6.7 Ethical and responsible use

The School will always maintain human oversight, which is essential to ensure that AI generated content and decisions are appropriate and accurate. All AI generated content, such as lesson plans or child feedback, is reviewed by a member of staff before being implemented. This ensures that the content is accurate and appropriate. If children's work is going to be used eg for marking, feedback etc permission will be sought to protect intellectual property rights.

The School is committed to transparency in its use of AI technologies. We will clearly communicate the purposes and benefits of AI tools to all stakeholders including parents, staff and children. This includes providing detailed information on how AI tools are used to enhance teaching, learning and administrative processes, as well as the measures in place to ensure their 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

- 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

7. Educating pupils about AI

Broxbourne CE Primary School acknowledges that children benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that children develop the right skills to make the best use of generative AI.

Children are advised that most AI tools have age restrictions, typically requiring users to be at least 13 years old. This is to protect their privacy and ensure safe usage, as part of their digital literacy. AI tools, like chatbots and virtual assistants have age limits to protect young users and so they should not be used without adult supervision. If they do encounter a concern then they should let an adult know as soon as possible.

Children are taught about the potential benefits of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly
- 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

8. Use of AI by pupils

Broxbourne CE Primary School recognises that AI has many uses to help children learn.

Children may use AI tools:

- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images

All AI-generated content must be properly attributed and appropriate for the age of the children and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, children may not use AI tools:

- During assessments, including internal and external assessments, and coursework.
- To write their homework or class assignments, where AI-generated text is presented as their own work.
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, math's calculations)

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, children should reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

Children must consider what is ethical and appropriate in their use of AI and 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

9. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on [AI use in assessments](#).

10. Staff training

It is essential that staff have a comprehensive awareness of the benefits and potential challenges of using AI and that they do so responsibly. The school will achieve this by referencing AI and through training staff in the appropriacy of use within the scope of this policy. Risks, including data privacy concerns, potential biases and ethical implications of AI use are also addressed.

Staff will receive training and CPD during staff meetings, at least annually, to ensure they have awareness. Staff must also understand the importance of safeguarding protocols when using AI tools, in line with Keeping Children Safe in Education guidance. It includes how to identify and mitigate risks associated with AI, such as exposure to inappropriate content or cyberbullying. Procedures for monitoring AI tool usage and reporting any safeguarding concerns are included in the training.

The Headteacher, AI Lead and Senior Leadership Team will

- be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI.
- Ensure they stay abreast of good practice, share this to support staff in their development and for their work life balance

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with our staff code of conduct.

Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- During or outside of working hours
- On an individual's own device or a school device
- At home, at school or from a remote working location

Staff members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- The generative AI application in question (whether or not it is one authorised by the school)
- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the headteacher immediately.

11.2 By governors

Governors found in breach of this policy will be investigated by the Chair of Governors using the same thresholds required of staff.

11.3 By children

Any breach of this policy by a child will be dealt with in line with our behaviour policy

12. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated 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 the emerging best practices, technological advancements, and changes in regulations.

The policy will be shared with the full governing board at least annually.

All teaching staff are expected to read and follow this policy. The Headteacher, AI Lead and the Senior Leadership Team are responsible for ensuring that the policy is followed.

The AI Lead will monitor the effectiveness of AI usage across the school and will report this to the Headteacher regularly.

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 children, 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
- Child Protection Policy
- Assessment Policy
- Behaviour Policy
- Staff Code of Conduct
- Marking and feedback Policy
- ICT Acceptable Use Policy
- Online Safety Policy
- Equality Policy