

Use of Artificial Intelligence (AI) Policy

Willow Grove Primary School



‘Be Safe, Be Kind, Be Positive’

Approved by:	Willow Grove Governing Body, Headteacher and Senior Leadership Team	Date: Awaiting Approval
Created by:	H. Smith	
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1. Introduction and Aims

Willow Grove Primary School is a specialist Social Emotional Mental Health (SEMH) provider and provides outreach support to mainstream schools in the Wigan Borough. All pupils at Willow Grove have an identified Special Educational Need (SEN), most of our pupils' primary area of need is SEMH. Many of our pupils have experienced early trauma and adversity, and many have attachment difficulties. Willow Grove is committed to providing an educational environment within which our pupils can heal, thrive, learn, and play. All staff work in line with trauma-informed practices, and they have an excellent knowledge of the strategies and resources that are available to meet the needs of pupils with SEMH and additional SEN.

Being safe is one of our core school values and this policy reflects our whole school commitment to safety, in particular online safety.

We understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations.

Therefore, the aim of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole school community.

This policy covers the use of AI tools by school staff, governors and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (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
- Prepare staff, governors and pupils for a future in which AI technology will be an integral part
- Promote equity in education by using AI to address learning gaps and provide personalised support
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR
- Materials on the SWGfl Website have been used to inform this policy. (www.swgfl.org.uk)
- This policy complements and supports other relevant school and Local Authority policies as well as being in line with the statutory guidance of AI issued by the DfE.
- The internet is an essential element in 21st century life for education, business and social interaction and the school has a duty to provide children and young people with quality access as part of their learning experience.
- The internet and technologies are ever changing, this policy aims to be as up to date as possible, however this is a quickly evolving technological time.

1.1 Definitions

This policy refers to both 'open' and 'closed' generative AI tools. These are defined as follows:

- **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

2. 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 \(DPA 2018\)](#)

3. Regulatory principles

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

REGULATORY PRINCIPLE	WE WILL ...
Safety, security and robustness	• Ensure that AI solutions are secure and safe for users and protect users' data • Ensure we can identify and rectify bias or error • Anticipate threats such as hacking
Appropriate transparency and explainability	• Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	• 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	• 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	• 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

Roles and responsibilities

4.0 AI lead

Our generative AI lead is Hazel Smith. They are responsible for the day-to-day leadership, ownership and management of AI use in the school.

4.1 Governing board

The governing board will:

- Take overall responsibility for monitoring this policy and holding the headteacher to account for its implementation in line with 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 5 and appendix 1)
 - Seek advice from the data protection officer / Digital / AI lead and the designated safeguarding 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

4.2 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
- Liaise with the DSL to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the school's child protection and safeguarding policy
- Ensure that the guidance set out in this policy is followed by all staff
- Review and update this AI policy as appropriate at least annually
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure pupils are taught about the effective use and potential risks of AI
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, AI lead, and data protection impact assessments

4.3 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 Leah Thomas Sergent and is contactable via the school office.

4.4 Designated safeguarding lead (DSL)

The DSL is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI

- Updating and delivering staff training on AI safeguarding threats
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE) and the school's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices

The school's DSL is Lindsay Glover and is contactable via the school office.

4.5 All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- Use only approved AI tools (see section 5 and appendix 1)
- Seek advice from the data protection officer / AI lead, as appropriate
- Report safeguarding concerns to the DSL in line with our school's child protection and safeguarding policy
- Check whether they are using an open or closed generative AI tool
- Ensure there is no personal identifiable information (PII) included in what they put into open or closed generative AI tools, this includes the name of the school, any personal information regarding staff or pupils or their identifying characteristics
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

4.6 Pupils

Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

4.7 Parents/ Carers

Parents and carers will be given information about the dangers and risks of AI tools, especially for SEND children. They will be given information regarding chatbots and they should monitor their child's use of AI tools, especially chatbots and inform school if they have concerns.

5. Staff and governors' use of AI

5.1 Approved use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete but cannot replace the judgement and knowledge of a human expert.

Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remain 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 doesn't mean it will always be appropriate.

5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes 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, taking into account advice from the AI lead the DPO and data protection impact assessments.

5.3 Data protection and privacy

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

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Willow Grove will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Please also refer to section 10 of this policy.

5.4 Intellectual property

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

Pupils 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.

Pupils' work must not be used by staff 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.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, **critical thought must be applied to all outputs of authorised AI applications**. This means fact and sense-checking the output.

We will ensure we can identify and rectify bias or error by training staff in this area.

We also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.

5.6 Raising concerns

We encourage staff and governors to speak to the headteacher in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with our school's child protection and safeguarding policy.

5.7 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
- Only use AI tools on school laptops for school purposes, this is so the correct filtering and monitoring can occur

Staff and governors must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

6. Educating pupils about AI

Here at Willow Grove, we acknowledge that pupils 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 pupils develop the right skills to make the best use of generative AI.

Through our PHSE and Computing curriculum we will teach pupils 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

7. Use of AI by pupils

We recognise that AI has many uses to help pupils learn.

However, due to the ever-changing nature of AI, at this time pupils are not allowed to directly use AI tools themselves, however the teacher may input their work, subject to copyright laws, if there is a specific purpose to it. For instance, a pupil has written a setting description, the teacher can then input this into approved AI tools to then generate an image of their description. The pupil would not be allowed to directly input this into an AI tool themselves.

AI has several risks that pupils with SEND are particularly vulnerable to, these include content that encourages or provides instructions for:

- Pornography
- Self-harm
- Suicide
- Eating disorders

8. 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](#).

9. Staff training

Staff will be kept up to date with developments in AI, including any statutory guidance that is shared by the DfE. This will be delivered during regular CPD sessions and emails by the AI lead.

10. Referral to our child protection and safeguarding policy

The school is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material
- Harmful content
- Harmful advertisements and promotions
- Bullying

Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the school's child protection and safeguarding policy and child protection referral process.

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 managed under the Governor's Code of Conduct, with advice from Wigan Governor Services.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with our Acceptable Use of Technology policy, if required, our child protection and safeguarding 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 by the AI Lead whenever there is a significant change to either AI use by the school or the associated risks of AI usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

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

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

The AI Lead will monitor the effectiveness of AI usage across the school.

We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

13. Links with Other Policies and Documents

This policy links to the following documents:

- Keeping Children Safe in Education
- Safeguarding and Child Protection Policy
- Acceptable Use of Technology Policy/Agreement
- Loan of Equipment Agreement
- Social Media Policy
- E-Safety Policy
- Anti Bullying Policy
- Staff Code of Conduct
- Data protection Policy
- Relationships Policy
- Equality Policy
- Governor's Code of Conduct

Next review due by: Summer Term 2027

Appendix 1: Approved uses of AI tools

Note that open-source AI tools / open AI tools, meaning tools that anyone can access and modify, should only be used for tasks that don't require personal information to be input.

Personal details of staff, pupils, parents or carers should not be used AI tools.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
ChatGPT (open generative AI tool)	• Teachers • SLT • Governors	• Letters to parents/carers • Job descriptions and adverts • Interview questions • Lesson planning • Leadership related tasks, strategic and operational.
Teach Mate AI (closed generative AI tool)	• Teachers • SLT • Governors	• Policy creation • Lesson planning • Interview questions • Lesson observations • Enhancing pupils learning
Chalkie AI (closed generative AI tool)	• Teachers	• Lesson planning • Lesson presentation • Lesson resources
SLT AI (closed generative AI tool)	• SLT	Leadership related tasks, strategic and operational.
Microsoft Co-Pilot (open generative AI tool)	• Teachers • SLT • Governors	• Letters to parents/carers • Job descriptions and adverts • Interview questions • Lesson planning • Leadership related tasks, strategic and operational.