



ROBERT CLACK SCHOOL

ARTIFICIAL INTELLIGENCE (AI) POLICY

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Controlled Document

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Version	Date	Author	Description of Change
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Version Control:

1. Introduction
2. Scope and purpose
3. Principles for using AI in schools
4. Legal and ethical considerations
5. Pupil use of AI
6. Staff use of AI
7. Procurement and approval
8. Data protection and security
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1. INTRODUCTION

Artificial Intelligence (AI) is becoming increasingly integrated into education, offering opportunities to support teaching, learning, and school operations. While the School is committed to exploring the benefits of AI in an educational context, we recognise the need for clear principles and safeguards to ensure its use is ethical, transparent, and lawful.

This policy is designed to sit alongside statutory obligations, including safeguarding, equality and data protection duties and complements existing policies such as the Data Protection Policy, Information Security Policy and ICT Acceptable Use Policies.

2. SCOPE AND PURPOSE

This policy applies to all staff, pupils, volunteers, governors, and third parties who access or use AI tools on behalf of the School. It covers AI systems used in the classroom, for assessment, administration, communication, and any other purpose involving School operations. The policy includes generative AI tools (e.g., chatbots or image generation), predictive analytics, and decision-support systems that use machine learning or algorithmic processing.

This policy also applies to trialling or piloting AI tools, not just permanent adoption.

3. PRINCIPLES FOR USING AI IN SCHOOL

The School is committed to using AI in a responsible, safe, and child-centred way. Any use of AI must:

- ◇ Support teaching and learning or school management in a demonstrable and measurable way
- ◇ Be lawful, fair, and transparent, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- ◇ Avoid harm to pupils or staff or the school, including reputational, emotional, or privacy-related harm.
- ◇ Preserve professional judgment and human oversight in decision-making processes
- ◇ Take into account safeguarding duties and the School's duty of care
- ◇ Be inclusive and free from bias or discrimination
- ◇ Comply with all relevant data protection and security obligations
- ◇ Maintain transparency with pupils, parents, staff and governors where AI is used in ways that directly affect them
- ◇ Ensure human accountability remains central. AI will only ever support, not replace, professional and pastoral judgement.
- ◇ AI-generated content must be treated as potentially inaccurate and must be checked by an appropriate member of staff before being relied upon.

4. LEGAL AND ETHICAL CONSIDERATIONS

AI tools that process personal data will only be used where there is a clear lawful basis under UK GDPR, such as public task, legal obligation or legitimate interests where applicable and

where appropriate Data Protection Impact Assessments (DPIAs) have been completed. In accordance with the Data Use and Access Act 2025 (DUAA), the School will monitor developments arising from the DUAA and will update its practices where relevant provisions are brought into force.

AI tools will only be used where a lawful basis is identified and documented. A DPIA will be undertaken where processing is likely to result in a high risk to rights and freedoms. The School will maintain a record of AI tools in use, their purposes and the lawful bases for processing.

Where AI tools make suggestions or generate content (e.g., marking, feedback, reports), these outputs will be reviewed and verified by staff. The School will not make solely automated decisions that produce legal or similarly significant effects concerning pupils, parents or staff. Meaningful human review and intervention will always be applied.

5. PUPIL USE OF AI

Pupils may be introduced to appropriate AI tools under supervision to support learning, creativity, and critical thinking. Any use of AI by pupils will be age-appropriate, safe, and guided by teaching staff. Where pupils are provided with access to external AI services, parents will be informed through appropriate privacy information and school communications. The School will ensure pupils understand the limitations of AI, including the potential for inaccurate or biased outputs. Pupils will be encouraged to question AI-generated content and to develop their own understanding through human interaction and critical reasoning.

The School recognises that pupils may independently access AI tools outside school. Pupils will be taught how to use AI responsibly, critically evaluate AI-generated content, and understand the ethical and academic implications of its use.

Pupils must comply with any examination board, coursework or assessment rules regarding the use of AI. Where AI has contributed to assessed work, pupils may be required to declare its use in accordance with examination board requirements.

AI must not be used by pupils to gain an unfair academic advantage. Work submitted as a pupil's own must accurately reflect their own understanding and effort. The School may investigate suspected misuse of AI in accordance with its Behaviour Policy, Assessment Policy and Examination Procedures.

The School will follow guidance issued by awarding bodies and regulators regarding the use of AI in examinations and non-examination assessments. Pupils and staff must comply with any restrictions imposed by examination boards.

AI will not be used to monitor or profile pupils without explicit safeguards and appropriate oversight. If AI is used for learning analytics, behaviour analysis, or attendance prediction, this will be clearly communicated to pupils and parents.

Where AI-assisted monitoring technologies are used to support safeguarding, online safety or behaviour management, the School will ensure that alerts, recommendations and risk indicators are reviewed by appropriately trained staff and are not relied upon without human assessment.

The School will ensure appropriate transparency with pupils and parents where AI tools are used for behaviour analysis, attendance prediction or safeguarding related purposes.

Where pupils are permitted to use personal devices, AI applications must not be used during lessons, assessments or examinations unless expressly authorised by a member of staff for educational purposes.

6. STAFF USE OF AI

Staff may use AI tools to support administrative and teaching tasks, such as planning lessons, generating materials, summarising documents, or analysing trends. Staff must exercise professional judgment and should not rely on AI for factual accuracy or academic appropriateness. Use of AI must always be consistent with the School's safeguarding duties, curriculum expectations, and professional standards. Staff should avoid uploading documents containing personal data (including staff names, pupil identifiers or sensitive information) into unapproved AI systems.

Staff must not input any personal, sensitive, or confidential data into AI tools unless the tool has been formally approved by the School, a DPIA has been completed (where required), and the data is processed in compliance with UK GDPR.

Where AI is used for recording meetings, staff must ensure participants are informed where AI-assisted recording or transcription is taking place and that any legal requirements relating to transparency, privacy and data protection are met.

Staff remain responsible for any content, decisions, communications or outputs generated using AI tools. AI-generated text must not be copied directly into reports, references, safeguarding records, behaviour records or communications without appropriate review.

AI-generated reports, references, assessment comments and pupil feedback must be reviewed and amended as necessary by the member of staff responsible for issuing them.

7. PROCUREMENT AND APPROVAL

AI tools must not be adopted for use with personal data until approved by the School's Senior Leadership Team following consultation with the School Data Protection Officer. Where personal data will be processed, a Data Protection Impact Assessment (DPIA) will be carried out, and a written agreement or contract with the supplier will be required. Only tools that meet the School's data protection and information security standards will be approved.

All AI tools will be risk-assessed for safeguarding and reputational risks, as well as technical/data risks. The School will keep a central register of approved AI tools.

The School will consider whether an AI tool uses School data to train its models and whether this can be disabled before approval is granted.

8. DATA PROTECTION AND SECURITY

The School will ensure that AI systems used for processing personal data comply with data minimisation, purpose limitation, and accuracy principles under UK GDPR. AI systems will be evaluated for security risks, and any data processed must be protected in line with the School's Information Security Policy. Suppliers must provide evidence of compliance, such as a Data Processing Agreement (DPA), security certifications, and transparency on whether personal data is used for training models.

Where AI tools are cloud-based or hosted outside the UK, additional safeguards will be applied in line with UK data transfer rules. Where possible, data will be anonymised or pseudonymised before processing by AI systems.

Where AI tools provide automatic transcription or recording, only necessary meeting content will be processed, and recordings will be deleted or anonymised once transcriptions are produced.

Personal data should only be entered into AI systems where there is a documented business need, and appropriate technical and organisational measures are in place.

The School will maintain a register of approved AI tools. The register will record the purpose of the tool, supplier details, whether personal data is processed, DPIA status, lawful basis and any specific restrictions on use.

9. TRAINING AND AWARENESS

Staff will be provided with training on the safe and responsible use of AI, including the ethical implications, risks, and limitations of such tools.

Pupils will be supported to understand how AI works, why it is used, and how to engage with it critically and safely. Parents and carers will be informed of any significant use of AI involving their child's personal data or affecting their learning experience.

Governors will receive awareness training so they can provide oversight and scrutiny of AI adoption.

10. MONITORING AND REVIEW

The DPO is responsible for monitoring and reviewing this policy. Although this policy is reviewed every three years, changes to legislation, national guidance, codes of practice or advice from the Information Commissioner advice may trigger interim reviews. The DPO will highlight any significant legislative developments that may require earlier action or updates to this Policy.

The School is aware of the upcoming Data Use and Access Act 2025, and this policy will be reviewed should any changes be brought into force affecting this policy.

11. LINKS WITH OTHER POLICIES

This policy is linked to the following School policies and procedures:

- Data Protection Policy
- Security Incident and Data Breach Policy
- Data Protection Impact Assessment Policy
- Information Sharing Policy
- Information Security Policy
- Safeguarding and Child Protection Policy
- UK GDPR Privacy Notices
- Records Management Policy
- Online Safety Policy
- Staff Code of Conduct
- ICT Acceptable Use Policy
- Remote Working Policy (if applicable)

The Information Commissioner also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk