



# Willow Wood Community Primary School

## School Online Safety Policy – Artificial Intelligence Policy

### Introduction

This policy is written using guidance from South West Grid for Learning Trust (SWGfL) which is a charity that has been at the forefront of supporting schools with online safety and security for 20 years and is recognised as a world leader in online safety innovation

As generative artificial intelligence (gen AI) continues to advance and influence the world we live in, its role in education is also evolving. There are currently 3 key dimensions of gen AI use in schools: learner support, teacher support and school operations; ensuring all use is safe, ethical and responsible is essential.

Evidence is emerging about the benefits of gen AI to enhance personalised learning and streamline administrative tasks, while also raising concerns around data protection, ethical use, and the preparedness of teachers to effectively integrate gen AI tools into classrooms.

This ongoing dialogue reflects the recognition of gen AI's transformative potential in education, balanced with a need for careful implementation to protect learner welfare and promote equitable outcomes. These considerations are shaping a pathway for embedding gen AI in schools, focusing on teacher training, ethical guidelines, and fostering digital competency among learners.

### Legislative Background and Key Documents

The UK Online Safety Act 2023 is designed to make the internet safer, particularly for children and vulnerable users, by regulating online content and holding tech companies accountable for harmful material. Ofcom is the online safety regulator in the UK and is responsible for publishing codes of practice and guidance on how companies can comply with their duties. Wherever use of gen AI includes use of personal data then data protection law applies, and the ICO is the relevant regulator. ICO has useful online guidance about the [data protection aspects of using AI](#), and has been commissioned by the UK Government to develop a statutory code of practice on Education Technology. In addition, the [ICO's Children's Code](#) sets statutory standards that providers of online services to children must meet.

There is currently no specific legislation regarding the use of gen AI in schools, but guidance has been developed and is being regularly updated as the technology evolves. Schools may wish to consult the following resources:

- Generative artificial intelligence in education – opportunities and considerations for schools and settings
- Generative AI: Keeping learners safe online



- AI foundations online training module
- Hwb - What is artificial intelligence: video produced by the Wales Collaborative for learning design
- AI Roadmap - GOV.UK
- AI Opportunities Action Plan (UK Government)
- Ofcom's 2024 Online Nation Report
- EU Artificial Intelligence Act 2024 - Useful high-level 4-point summary of considerations
- UNESCO AI Competency Framework for Students (Guidance)
- UNESCO AI Competency Framework for Staff (Guidance)
- Data protection in schools - Artificial intelligence (AI) and data protection in schools - Guidance - GOV.UK
- Guidance on AI and data protection | ICO
- What is personal data? | ICO
- AI and cyber security: what you need to know - NCSC.GOV.UK

## Context

Gen AI represents a transformative leap in technology, enabling machines to create text, images, audio, and video with remarkable accuracy and creativity. Emerging from advancements in machine learning, particularly deep learning, generative models such as GPT (Generative Pre-trained Transformer) and Copilot (the AI model Willow Wood Community Primary School access) leverage vast datasets to understand and produce content that mimics human expression. Initially text-focused, these models have evolved to become multi-modal, integrating and processing various types of input, such as text and images, to generate cohesive outputs.

Since the debut of early systems like OpenAI's GPT-2 in 2019, the field has rapidly advanced, unlocking opportunities in education while raising critical considerations around ethics, data privacy, and equitable access. Systems continue to advance at great speed.

According to Ofcom's 2024 Online Nation Report more than half of children have used gen AI tools in the past year. Teenagers aged 13-15 are more likely to use AI (66%) than those aged 8-12 (46%) and combining both age groups, over half (53%) have made use of AI to support with homework tasks. There is a broad range of purposes for children using AI including finding information, creating images/videos, seeking advice and summarising text, with the most popular tool among 8-15s being ChatGPT (37%) followed by Snapchat My AI (30%).

Willow Wood Community Primary School must now navigate this landscape thoughtfully, crafting policies that harness the benefits of gen AI for creativity and learning while prioritising learners' safety, security, data protection and well-being.



## **Policy on the use of Gen AI in Schools**

### **Statement of intent**

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that integrating gen AI tools into education presents many opportunities, including the potential to enhance educational experiences and support staff with some administrative tasks. However, their use must prioritise safety, responsibility, ethics, trust, data protection and inclusivity.

We also realise that there are risks involved in the use of gen AI systems, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address risks.

We will educate staff and learners about safe and ethical use of gen AI, preparing them for a future in which AI technologies are likely to play an increasing role.

The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

### **Related policies**

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements

### **Policy Statement**

- The school acknowledges the potential benefits of the use of gen AI in an educational context - including enhancing learning and teaching, improving administrative processes, managing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use gen AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Learners Safe
- We will provide relevant training for staff and where appropriate, governors in the potential advantages, use of and potential risks of gen AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about gen AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and



social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with gen AI tools.

- As set out in the staff acceptable use agreement, staff will be supported to engage with gen AI tools responsibly, ensuring the protection of both personal and sensitive data.
- Staff will always ensure gen AI tools used comply with UK GDPR and other data protection regulations, verifying with the Data Protection Officer (DPO) that tools comply with standards set by the Information Commissioner's Office (ICO) before using them for work related to the school. They are encouraged to use Copilot for any tasks that might involve sensitive information but an AI tool such as ChatGPT or TeachMate AI can be used for general tasks such as creating lesson resources.
- All staff will be required to carefully consider the use of any gen AI tool and involve senior leadership in decision-making around its use.
- Staff should always use school-provided accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Schools and practitioners will not input any personal data, learner data or other sensitive or confidential information into gen AI tools.
- The school will ensure that when gen AI is used, it will not infringe copyright or intellectual property conventions. Care will be taken to avoid intellectual property, including that of the learners, being used to train gen AI models without appropriate consent.
- Staff must report any incidents involving gen AI misuse, data breaches or inappropriate outputs immediately to the relevant internal teams.
- The school will keep a record of all tools in use, their purpose and potential risks. ([Risk assessment matrices are attached as an appendix](#))
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When acquiring and implementing gen AI systems, we will follow due care and diligence to prioritise fairness and safety.
- The school will support parents and carers in their understanding of the use of gen AI in the school.
- Where staff use gen AI tools to support their learning and teaching practice, this will be purposeful, considered, with a clear focus on ensuring impact and understanding and mitigating risk.
- Staff will ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance.
- Staff will ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing.
- Improper use of gen AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.



## Responsibilities

### Headteacher and Senior Leaders

Are responsible for the strategic planning of how gen AI will be used in the school, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

### Designated Safeguarding Person (DSP) / Online Safety Lead

Our Designated Safeguarding Person / Computing Lead has responsibility for online safety in the school. They are expected to have knowledge of gen AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

### Data Protection Officer (DPO)

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of gen AI, including related Data Protection Impact Assessments (DPIAs) which will be undertaken when considering use of any digital tools and services that may use personal data. Where personal data will or may inadvertently be used the school will ensure that data subjects rights are upheld. In these cases, privacy notices will be provided.

### Technical Staff

Technical staff and the Computing Lead will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems. School has an external contract for technical support (Oneit) and we ensure that their Education Technology Support Partner is aware of the school's requirements regarding gen AI and that this complies with school policies.

### Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of gen AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that:

- the school environment is safe
- all personal, sensitive and confidential data / information is secure
- that their actions do not put the reputation of the school at risk and that
- learners understand their responsibilities

### Governors

We ensure that our governing body has a good understanding of how gen AI is used in a school context and potential benefits and risks of its use. They receive regular training as required and updates, enabling them to support the school and challenge where necessary. This may include evaluation of the use of gen AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated. Governors will consider AI issues and concerns as part of the Resources committee and the Curriculum committee.

### Parents/carers

We work hard to engage parents and carers by:



- in school sessions
- sharing information online e.g., website, social media
- providing curriculum information

Our parents and carers are made aware of how gen AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their child's learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity. School staff will inform parents where their child had misused AI in school or has been the victim of AI misuse.

### Vulnerable groups

We recognise that vulnerable learners are more likely to be at risk from the misuse of gen AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of gen AI, while being aware of the potential risks.

Children are considered vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk".

### Safeguarding

At our school, the safety and wellbeing of all pupils is our highest priority. As emerging technologies such as Artificial Intelligence (AI) become increasingly present in education and everyday life, we are committed to ensuring that their use within our school environment is safe, ethical, transparent, and firmly grounded in our safeguarding responsibilities.

We recognise that AI has the potential to enhance learning, support creativity, and improve the efficiency of school processes. However, the use of AI also introduces potential risks, including exposure to inappropriate content, misinformation, bias, data protection concerns, and wellbeing impacts. To protect our learners, the school will ensure that:

- No personal, sensitive, or identifiable pupil data is entered into AI tools, unless those tools have been formally approved, risk-assessed, and comply fully with UK GDPR and child-specific data protection standards.
- All AI tools used within school are vetted, monitored, and subject to robust filtering and safety controls, ensuring that learners cannot be exposed to harmful or unsuitable material.
- Human oversight is always maintained; AI will never replace the professional judgement of staff, particularly in matters related to teaching, assessment, or safeguarding decisions.
- Staff and pupils are supported to understand the risks and limitations of AI, including bias, misinformation, and ethical considerations, and are taught to use AI safely and responsibly.
- Any AI-related concerns - including inappropriate outputs, misuse, or potential safeguarding issues - are reported immediately through existing safeguarding procedures and dealt with promptly and sensitively.
- AI use will always prioritise the welfare, dignity, and rights of children, ensuring that technology supports, rather than compromises, their safety, privacy, and wellbeing.



Through careful planning, responsible implementation, and ongoing monitoring, we will ensure that AI contributes positively to the learning environment while upholding the highest standards of safeguarding for every child in our care.

## **Reporting**

Our reporting systems are well promoted, easily understood and easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties where we deem them to be credible. This can be done via:

- a member of staff
- established school reporting mechanisms
- online/offline reporting tool
- anonymous/confidential reporting routes

## **Responding to an incident or disclosure**

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All gen AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, local authority, DPO, ICO. Any breaches must be reported to ICO within 72hrs of school becoming aware a breach has occurred.
- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of gen AI by staff, the normal staff disciplinary processes will be followed. If the misuse involved personal data and was deliberate / negligent, could constitute a criminal offence under S170 of the Data Protection Act 2018.

## **Risk assessment**

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of gen AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks



- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being
- Duty of care

The example matrix included at the end of this policy template may be used to evaluate risk within the school and may be edited and adapted further accordingly through the normal school procedures and review of our processes.

### **Education and training**

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including gen AI.

This policy outlines our commitment to integrating gen AI effectively within our school environment. We will use gen AI responsibly, safely and purposefully to support with a variety of tasks such as:

- assisting with some routine administrative functions
- helping provide more personalised learning experiences
- supporting lesson planning, marking, feedback and reporting
- providing contexts to support development of critical thinking skills
- supporting school-level curriculum and assessment design

AI literacy, which includes being able to think critically, engage with evidence and information, verify sources and use creativity, will be fundamental. The skills integral to the four purposes, which should be developed across all Areas of Learning and Experience in the Curriculum, are focused on building these dispositions. Our school's approach is to deliver this knowledge and understanding where it is appropriate and relevant in our curriculum.

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting's risk profile. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this by:

- Engaging with learners
- Critical evaluation of emerging trends and research findings
- Seeking advice from technical experts and our Data Protection Officer.
- Surveys
- Focus groups
- Parental engagement
- Staff consultation
- Staff training



As gen AI becomes an integral part of modern education, it is important that staff develop the knowledge and skills to integrate gen AI tools responsibly into teaching, learning, and administrative processes. By fostering AI literacy, staff can confidently prepare learners for a future where AI is a key driver of innovation and opportunity.

- We will support and ensure all staff can access training on the effective, responsible, lawful and ethical use of emerging technologies in education.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including 'Keeping Children Safe In Education'.
- We will support staff to identify, assess, and mitigate risks associated with gen AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will support staff to ensure compliance with UK GDPR and other relevant regulations while using gen AI systems.
- We will promote ethical practices in the use of gen AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower staff to teach learners about the safe and ethical use of gen AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.

The following resources are used:

- Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- Hwb - Sharing nudes and semi-nudes: Responding to incidents and safeguarding children and young people
- Common Sense Education AI literacy and digital citizenship materials
- Curriculum for Wales - Hwb
- AI Foundations: training module for education practitioners
- Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on gen AI.
- ICO school resources

### **Additional links**

- [SWGfL – Artificial Intelligence and Online Safety](#)
- [Understanding AI for school – Tips for School Leaders](#) - ASCL, NAHT, CST, and others



## Appendix 1 - Risk Assessment Matrix for Schools Implementing gen AI

### Introduction

The following risk assessment matrix is intended to help schools identify, evaluate, and mitigate risks associated with implementing gen AI in educational processes.

The matrix considers potential risks across various domains, including data protection, ethical considerations, and operational integrity. There is a particular focus on safeguarding and wellbeing issues, highlighting potential risks to learner welfare and offers strategies to mitigate these risks effectively. Schools should amend the content of the matrix as necessary and consider the risk profile that is relevant to their own circumstances.

### Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
<b>Gen AI training</b>	Insufficient training or guidance impacting the ability of staff to adopt, use, and monitor gen AI safely and ethically within their school.				Ensure all staff can access regular training to support the safe and ethical use of gen AI in teaching and learning.
<b>Data Protection and Privacy Breaches</b>	Complexity of the tech and contracts will make it hard for schools to fully understand what use the gen AI provider will make of data inputted (including inadvertent provision of personal data).				Due diligence including advice from DPO before signing contract. Implement strong encryption, regular audits, and UK GDPR-compliant data management



	Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.				policies and conduct regular privacy audits.
<b>Cyberbullying</b>	Increased potential for bullying through AI-mediated communication tools.				Monitor gen AI communication tools, implement clear reporting mechanisms, and provide learner support.
<b>Over-reliance on gen AI</b>	Over-reliance on gen AI tools reducing interpersonal interactions among learners. Reduction in teacher autonomy and critical decision-making by overusing gen AI tools.				Encourage collaborative learning activities and balance gen AI use with social engagement. Define clear boundaries for gen AI use and regularly review its impact on pedagogy.
<b>Emotional Manipulation</b>	Gen AI systems unintentionally affecting learner mental health through curated content.				Monitor AI-generated content, involve mental health professionals, and promote media literacy.



<b>Inappropriate Content or Conduct</b>	Gen AI exposing learners to harmful or unsuitable materials / behaviour				Conduct rigorous testing of gen AI tools, apply effective filtering and monitoring and ensure human oversight.
<b>Mental Health Impacts</b>	Overuse of gen AI tools causing stress, anxiety, or dependency in learners.				Monitor usage patterns, provide mental health resources, and set expectations on use of gen AI systems.
<b>Bias and Discrimination</b>	Gen AI systems propagating biases that impact learner wellbeing or inclusion. Gen AI models producing discriminatory or biased outcomes.				Regularly audit gen AI algorithms for bias and provide inclusive media literacy education and training.
<b>Misuse of AI</b>	Learners using gen AI tools for harmful, unethical or illegal purposes (e.g. nudification).				Educate learners on responsible and appropriate gen AI use and establish clear usage policies.
<b>Misinformation</b>	Creation or spread of harmful or misleading AI-				Educate staff and learners to verify gen



	generated content.				AI outputs and establish clear policies for verifying content authenticity.
<b>Digital Divide</b>	Inequitable access to gen AI tools among learners from diverse demographic groups.				Provide equitable access to gen AI resources and ensure alternative solutions are available.
<b>AI Ethics Awareness</b>	Lack of awareness among staff and learners about ethical implications of gen AI.				Provide training and education on gen AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
<b>Data Accuracy</b>	Gen AI systems generating inaccurate or misleading recommendations.				Regularly validate gen AI outputs and involve human oversight in decision-making.
<b>Legal Compliance</b>	Non-compliance with laws regarding gen AI usage and learner data.				Understand legal requirements. Conduct legal reviews and consult experts on gen AI-related regulations.



<b>Cyber-Security</b>	Increased use of gen AI tools in cyberattacks targeting school systems and data.				Strengthen cybersecurity protocols and educate staff and learners on safe online practices.
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### Likelihood and Impact Definitions

- **Likelihood:** The likelihood that the identified risk will occur.
  - Low: Unlikely to occur under normal circumstances.
  - Medium: Possible occurrence based on past trends or vulnerabilities.
  - High: Likely to occur without intervention.
- **Impact:** The severity of impact should the risk materialise.
  - Low: Minimal disruption with limited consequences.
  - Medium: Moderate disruption affecting key processes.
  - High: Significant disruption with severe consequences.

### Review and Update

The school will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.



## **Appendix 2 - Staff (and Volunteer) Use of Generative AI (Gen AI) Acceptable Use Agreement Template**

### **School Policy**

Emerging technologies, including gen AI, are increasingly integrated into educational settings and the lives of staff and learners. These technologies have potential to enhance creativity, promote personalised learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, ethical application and legal compliance.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of gen AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of gen AI.
- Staff have a clear understanding of their responsibilities when engaging with gen AI and emerging technologies in professional and personal contexts.

### **Acceptable Use Policy Agreement**

I understand that I must use gen AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

#### **For my professional and personal safety:**

- I understand that the school will monitor my use of gen AI tools and technologies.
- I will only use gen AI tools and technologies for purposes authorised by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, learners, or parents/carers is only entered into gen AI systems that have been through a DPIA process.
- I will report any gen AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

#### **In my communications and actions:**

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt gen AI outputs.
- I will critically evaluate the outputs of gen AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight and in compliance with the UK GDPR.
- I will communicate professionally and responsibly when using gen AI systems.
- I will ensure transparency by ensuring attribution where gen AI has been used and providing a privacy notice if personal data has been used.



**When engaging with learners:**

- I will support learners on the safe, ethical, appropriate and effective use of gen AI.
- I will use gen AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

**When using the school's systems and resources:**

- I will use gen AI systems in compliance with established security measures and access protocols.
- I will ensure that any gen AI applications used in teaching or administration comply with the school's policies.
- I will ensure gen AI tools are not used to impersonate others or create deceptive or harmful content.

**When handling data:**

- I will ensure compliance with the school's data protection policies when using gen AI for any purpose.
- I will ensure there is lawful basis for uploading sensitive school-related information into gen AI systems, established as part of the DPIA process.

**Responsibility and Accountability:**

- I will use gen AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of gen AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all gen AI-related activities within and outside of school premises that are connected to my professional responsibilities.