AYLSHAM LEARNING FEDERATION

AI POLICY

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Signed: .....

Chair

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1. Aims and scope

Here at Aylsham High 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, 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

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

4. Roles and responsibilities

4.0 AI lead

Our generative AI lead is Chris Bridge. 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/or AI lead is/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 / IT / 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 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 Fiona Tibbett and is contactable via ftibbett@aylshamhigh.norfolk.sch.uk

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 Kathryn Garnham and is contactable via kgarnham@aylshamhigh.norfolk.sch.uk

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 / IT / 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 identifiable information included in what they put into open generative AI tools e.g. student names or student identification numbers.
- Use SIMS identification numbers if sharing student work with AI.
- Ensure that any assessment or feedback processes used within AI, are overseen to monitor accuracy and maintain a clear understanding of student progress and attainment.
- 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')

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 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 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 unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Aylsham High School 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 students 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

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 Aylsham High School 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.
Students will be taught about the potential benefits of AI and how these tools can be integrated into their work to support their learning. Topics covered will include:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- Online safety to protect against harmful or misleading content
- Approaches to integrate AI as a learning tool

7. Use of AI by pupils

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

Pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas
- To support self assessment and provide feedback to develop learning and understanding.

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

AI may also lend itself to cheating and plagiarism. To mitigate this, pupils 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, maths calculations)

This list of AI misuse is not exhaustive.

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

Aylsham High School will consider any unattributed use of AI-generated text or imagery to be plagiarism. This will result in work having to be repeated without the use of AI generated material.

Pupils 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 or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils
- Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our exams / assessment policy for more details.

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

9. Staff training

Initial training will be completed via the AI working party/twilight group and disseminated from members of the group.

Members of the AI group will share practise with individuals, departments or groups with a similar interest.

As part of the training and sharing of good practice, AI policies and expectations will be covered to ensure the use of AI falls within expectations for safe internet use and safeguarding.
Collaborative approaches will allow for development of work and good practice to be shared.
The school will continue to seek best practice at local and national levels which allows the work at AHS to be developed. .

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 dealt with in line with the governors code of conduct

11.3 By pupils

Any breach of this policy by a pupil 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 by the AI working party 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. Chris Bridge is responsible for ensuring that the policy is followed.

The AI working party 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. Summary of AI uses

To help ensure that AI technology is being used in line with this policy, the table below summarises how AI can and cannot be used at AHS. This list will be reviewed as required. In order to work within the expectations of the policy, it will be important that activities listed as not being used yet are not undertaken by AHS colleagues. Please remember that it is the responsibility of the person generating AI resources/material to ensure that the material is appropriate to use at AHS and has been checked to ensure that the information contained in the material is correct.

	AI technology can be used for the following …	**AI technology cannot be used for the following ….**
Chat GPT	● Generation of teaching resources e.g. worksheets, quizzes, Powerpoints. ● Supporting communication with parents' and carers via email or	● The uploading and sharing of student work. ● The analysis of student or school data which contains identifiable student markers.

	letters. ● Supporting the writing of policies or guidance documents.	● The sharing of any material which allows individuals at AHS to be identified. ● The marking of student work*. ● Generation of feedback on student work*.
Google Gemini and Notebook LM	● Generation of teaching resources e.g. worksheets, quizzes, Powerpoints. ● Supporting communication with parents' and carers via email or letters. ● Supporting the writing of policies or guidance documents. ● As a 'tutor in your pocket' to support student independent work.	● This is a closed system and we are working on using it to assess and provide feedback on student work.

*we will be working with parents/carers and students to develop this area for potential future use. ,

Appendix 1: Approved uses of AI tools (table)

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.

Approved AI tools	approved for	Approved uses
KeyGPT	● Teachers ● Governors ● Admin colleagues	● Letter to parents/carers ● Job descriptions and adverts ● Interview questions
Oak Academy AI lesson planner	● Teachers	● Supporting lesson planning ● Generating resources
Chat GPT	● Teachers ● Governors ● Admin colleagues	● Supporting lesson planning ● Generating resources to support learning ● Letters to parents/carers ● Automation of tasks
Copilot	● Teachers ● Governors ● Admin colleagues	● Supporting lesson planning ● Generating resources to support learning ● Letters to parents/carers ● Automation of tasks
Google Gemini	● Teachers ● Governors ● Students	● Creating teaching resources ● To support independent learning ● Support lesson planning ● Letters to families ● Analysis of data and information ● Assessment and feedback of student work
Notebook LM	● Teachers ● Governors ● Students	● Creating teaching resources ● To support independent learning ● Support lesson planning ● Letters to families ● Analysis of data and information ● Assessment and feedback of student work