ARTIFICIAL INTELLIGENCE

POLICY

2026 - 2027

Approved by:	Ratified by Governing Body	**Date:** September 2026
Effective Date:	September 2026	
Last reviewed on:	September 2026	
Next review due by:	September 2027	
Reviewed by:	Chris Dwyer – IT Strategy, Branding and Communication Lead	
Website:		
Yes/No	YES	

1. Purpose and Scope

Generative artificial intelligence (AI) tools – including large language models such as ChatGPT, Microsoft Copilot, Google Gemini, and Claude – are increasingly embedded in the software our staff and pupils use every day. The Greensand Federation recognises that, used safely and thoughtfully, AI can reduce staff workload, support inclusive teaching, and prepare our pupils for a world in which AI is part of higher education, work, and civic life.

This policy sets out how AI may and may not be used by staff, pupils and students at Moggerhanger Primary School and Sandy Secondary School. It applies to all Federation-owned devices, Federation accounts, and any use of AI in connection with Federation business, including remote and home use that affects pupils' learning, welfare, or assessment.

2. Definitions

- "AI" / "generative AI": software that produces new text, images, audio, video, or code in response to a user prompt, including chatbots, image generators and AI features built into other products (e.g. Copilot in Microsoft 365).

- "Approved tool": an AI tool that has been risk-assessed and added to the Federation's approved AI tools list. Section 5 sets out how the list is developed, reviewed, and signed off. The current list will be published in the shared area alongside this policy, and requests to add a tool are made to the Executive Principal.

- "Personal data": as defined under the UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 – any information relating to an identified or identifiable living individual, including pupils, parents, and staff.

- "AI-assisted work": any pupil, student or staff output that has used generative AI at any stage – from idea generation through to drafting, editing, or producing the final piece.

- "Public AI tool": any AI service used outside the Federation's own Microsoft 365 tenant or an approved licensed account, including consumer versions of Copilot, ChatGPT, Gemini and Claude signed in with a personal account. Copilot accessed through a Federation Microsoft 365 account is not a public AI tool for the purposes of this policy; consumer Copilot signed in with a personal account is. If in doubt, treat the tool as public.

- "AI companion or character chatbot": an AI service designed to simulate conversation, friendship, or a relationship. Keeping Children Safe in Education 2026 treats these as a contact risk rather than simply as content, in the same way as any other stranger encountered online.

- Terminology: this policy uses "pupils" when referring to Moggerhanger Primary School and "students" when referring to Sandy Secondary School, reflecting the usual practice of each school. Where both are meant, the policy says, "pupils and students."

3. Aims and Guiding Principles

The Federation's approach to AI is built on the same principles that underpin our wider vision – safe, ambitious, inclusive, and rooted in strong relationships between staff and pupils. AI should support, never replace, the professional judgement of teachers and the original thinking of pupils.

- Safety first – protecting pupils, staff and personal data is non-negotiable.
- Human in the loop – a named member of staff is always responsible for any AI-assisted output used in school.
- Transparency – staff and pupils are open about when and how AI has been used.
- Equity – access to and benefit from AI should not depend on a family's ability to pay for tools at home.
- Critical use – we teach pupils to interrogate AI outputs for accuracy, bias, and source.
- Workload reduction – we actively look for opportunities for AI to reduce administrative burden so staff can focus on teaching and pastoral care.

4. Roles and Responsibilities

Governing Body

- Approves this policy and reviews it at least annually, or sooner if national guidance changes.
- Receives an annual report from the Executive Principal on AI use, incidents, and impact.

Executive Principal and Heads of School

- Maintain the Federation's approved AI tools list and associated risk assessments, working with the IT Strategy/Network Lead and the Data Protection Officer, and review the list at least termly.
- Ensure all staff receive appropriate training before using AI in their role.
- Investigate any breaches of this policy and apply sanctions in line with the Staff Code of Conduct or Behaviour Policy as appropriate.

Designated Safeguarding Lead (DSL)

- Ensures AI use is reflected in the Federation's safeguarding arrangements and compliance with Keeping Children Safe in Education 2026 (KCSIE), which came into force on 1 September 2026.
- Receives and acts on any safeguarding concerns linked to AI – for example deepfakes, harmful content or AI-enabled online abuse.

Data Protection Officer (DPO)

- Approves Data Protection Impact Assessments (DPIAs) for any new AI tool that processes personal data.
- Advises staff on the lawful, fair, and transparent use of AI in line with the UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

All staff

- Use only approved AI tools for Federation work.
- Do not enter personal, sensitive, or confidential data into any AI tool unless it has been specifically approved for that purpose.
- Take professional responsibility for the accuracy, appropriateness, and quality of any AI-assisted output.
- Model and teach safe, ethical AI use to pupils.

Pupils and students

- Follow the rules in section 6 below and any subject-specific guidance from teachers.
- Be honest about when AI has been used in their work.
- Report any AI-generated content that is upsetting, inappropriate or harmful to a trusted adult.

5. Staff Use of AI

Staff are encouraged to explore AI as a tool to reduce workload and improve practice, within the boundaries below. The traffic-light framework should be applied as a quick reference; if in doubt, ask the Head of School before proceeding.

The approved AI tools list

The Federation will maintain an approved AI tools list. The list is developed and reviewed by the Executive Principal, the Head of School, the IT Strategy/Network Lead and the Data Protection Officer and is signed off by the Executive Principal. Tools are added following consideration of safeguarding, data protection, age-appropriateness and terms of service, security, accessibility, educational value, and workload impact. The list is reviewed at least termly, and a tool may be removed at any time if its terms, data handling, pricing, or risk profile change.

Transitional arrangements

Until the approved AI tools list is published, staff may use AI tools only for low-risk, generic tasks, meaning the GREEN activities below, where no personal, confidential, sensitive, safeguarding, SEND, behaviour, assessment, or HR information is entered. Any AI use involving pupil work, personal data, assessment, feedback, SEND or pastoral planning, meeting transcription, safeguarding, or confidential Federation documents requires prior approval. Requests go to the Head of School, who consults the IT Strategy/Network Lead and the Data Protection Officer as required; decisions are recorded and form the basis of the initial list. Nothing in this arrangement makes the RED activities below available for approval — those remain prohibited in all circumstances. This arrangement applies until the list is published and will be reviewed no later than the end of the autumn term 2026.

GREEN	**Encouraged – with professional judgement** • Generating ideas for lesson activities, retrieval practice, and differentiation. • Drafting non-confidential communications, letters, and newsletters (always edited and signed off by a human). • Producing model answers, sentence stems, and worked examples. • Creating quizzes and low-stakes assessment items from de-identified content. • Summarising publicly available documents (e.g. published research, statutory guidance). • Translating standard parental communications, with a final check by a human speaker where possible. • These activities do not require prior approval, provided no personal, confidential, or sensitive information is entered and the output is checked, edited, and owned by the member of staff before use.
AMBER	**Conditional – only with explicit approval** • Use of AI marking or feedback tools – must be on the approved list and used only with anonymised pupil work. Where AI-assisted marking or feedback could contribute to a significant decision about a pupil, such as setting, predicted grades or intervention, a member of staff must review the output, record the decision and be able to explain it on request. Articles 22A to 22D of the UK GDPR, introduced by the Data (Use and Access) Act 2025, apply to decisions of this kind. • Use of AI for SEND or pastoral planning – only with anonymised information and DPO sign-off. • Trialling a new AI tool not yet on the approved list – requires Head of School approval and a DPIA. • Recording or transcribing meetings – only with the consent of all participants and using approved tools. Recordings and transcripts are stored in the relevant Federation system, access is limited to those who need it, and they are deleted once the notes or minutes are agreed. Pastoral, SEND and HR recordings follow the retention periods set out in the Data Protection Policy.
RED	**Prohibited – not available for approval** • Entering pupils' names, photographs, SEND information, safeguarding records, or any other personal data into a public AI tool. • Using AI to write safeguarding records, EHCPs, references or formal HR documentation. • Using AI to generate final reports to parents without substantive human authoring and review. • Uploading internal Federation documents marked confidential to any third-party AI service. • Using AI to impersonate staff, pupils, or parents (text, voice, or image).

Verification and transparency

- Staff must read, fact-check and edit any AI-generated content before using it. The professional and legal responsibility for the output rests with the member of staff, not the tool.

- Where AI has materially shaped a document shared outside the Federation (e.g. a policy draft or a parental communication), this should be noted to the line manager on request.

- Staff must not present AI-generated content as their own original academic or professional qualification work (e.g. NPQ, ECT or master's assignments) unless the awarding body explicitly permits it.

6. Pupil and Student Use of AI

Our approach distinguishes between primary-aged pupils, where AI use is teacher-directed and tightly supervised, and secondary-aged students, where the focus shifts to building AI literacy and academic integrity ahead of further study and the workplace.

Before directing pupils or students to any AI tool, staff must check the tool's minimum age and terms of service. Most general-purpose AI tools set a minimum age of 13, and several require parental consent below the age of 18. That covers every pupil at Moggerhanger Primary and Years 7 and 8 at Sandy Secondary. Accounts are created for pupils or students only where the Federation's own licence or Microsoft 365 tenant permits it.

Moggerhanger Primary School (EYFS – Year 6)

- Pupils do not use general-purpose generative AI tools independently.
- Where AI is used in lessons, it is teacher-led on a teacher's account and projected or modelled to the class – for example, generating an image to discuss, or showing how a chatbot can be wrong.
- Any pupil-facing AI feature (e.g. inside a learning platform) must be on the approved list and have age-appropriate filtering and monitoring.
- Pupils are taught, in age-appropriate ways, that AI can make mistakes and that work they submit must be their own.

Sandy Secondary School (Years 7 to sixth form)

- Students may use approved AI tools to support their learning where a teacher has explicitly permitted it for a given task – for example, generating revision questions, getting explanations of concepts, or checking grammar.
- Students must not submit AI-generated work as their own. Using AI to write all or substantial parts of a piece of assessed work, without acknowledgement, is malpractice and will be dealt with under the Behaviour Policy and (for exam work) JCQ regulations.
- Where AI has been used in a permitted way, students must declare it – for example by noting which tool was used and how ("I used Copilot to suggest counterarguments, which I then evaluated and rewrote in my own words").
- Students must not enter personal data about themselves or others, or upload other people's work, into AI tools.
- Students must not use AI to create images, audio or video of staff, pupils, or other individuals; deepfakes and AI-generated sexual or harmful content will be treated as a serious safeguarding and behaviour matter. Keeping Children Safe in Education 2026 brings images that have been digitally altered or wholly generated by AI within its definition of nudes and semi-nudes, so incidents of this kind are handled under the Child Protection and Safeguarding

Policy and the UKCIS guidance 'Sharing nudes and semi-nudes: how to respond to an incident', not under the Behaviour Policy alone.

- Some approved platforms, including the immersive and virtual reality platforms used at Sandy Secondary School, contain built-in AI tutors or characters that students can hold a conversation with. These are treated in the same way as any other chatbot: the platform must be on the approved AI tools list, use is teacher-directed and supervised, and students must not enter personal information about themselves or others. Students are reminded that an AI tutor is not a person and is not a source of pastoral or personal advice.

Examinations and formal assessment

All formal qualifications follow JCQ's 'AI Use in Assessments: Your role in protecting the integrity of qualifications' (revision 2, 30 April 2025, or any later edition). Any use of AI in non-examination assessment (NEA) must be appropriately acknowledged and within the rules of the relevant specification. Suspected AI malpractice in exam work will be investigated and reported to the awarding body in line with JCQ requirements. The Federation will not rely solely on AI-detection software when making judgements about suspected malpractice. Students submitting non-examination assessment sign the JCQ candidate declaration confirming that the work is their own and that any AI use has been acknowledged.

7. Data Protection

- Personal data must not be entered into any AI tool that has not been specifically approved for that purpose. The default assumption is that prompts entered into a public AI tool may be retained and used to train future models.

- Before any new AI tool is used for Federation business that involves personal data, a DPIA must be completed and signed off by the DPO, and the relevant pupil, parent and staff privacy notices are reviewed and updated so that the processing is transparent to the people affected.

- Where staff are unsure whether a piece of information counts as personal data, they should anonymise it or seek advice from the DPO before using AI.

- Pupils' original work must not be uploaded to AI tools to train models without explicit permission, in line with current DfE guidance.

8. Intellectual Property and Copyright

- Federation lesson materials, schemes of work and assessment items remain the intellectual property of the Federation. Staff should not upload bulk Federation content to public AI tools.

- Pupils' work belongs to the pupils. It must not be shared with AI tools in a way that allows it to be used to train commercial models.

- Staff should not generate AI images, music or text in styles that clearly imitate a named living artist for Federation publications, where this could infringe rights.

9. Safeguarding, Filtering and Monitoring

- AI use is part of the Federation's wider safeguarding arrangements under Keeping Children

Safe in Education 2026, which directs schools to the DfE publication 'Generative AI: product safety expectations' when choosing and using AI tools.

- Federation networks include filtering and monitoring that flag access to inappropriate AI services and harmful AI-generated content. The effectiveness of filtering and monitoring is reviewed at least once every academic year and a record of those checks is kept, as set out in Appendix E of the Online Safety and Acceptable Use Policy.

- Pupils and students are taught, through PSHE, computing and tutor time, about AI risks including misinformation, deepfakes, sextortion using AI imagery, AI-generated bullying, AI companion and character chatbots, and the limitations of chatbots as sources of advice. Because most exposure to companion chatbots happens at home, this is also covered in communications to parents and carers.

- Any concern that a pupil has been harmed by AI-generated content (including content created by other pupils) must be reported to the DSL the same day.

10. Equality, Accessibility and SEND

- We recognise AI tools (e.g. text-to-speech, speech-to-text, summarisation, translation) can significantly support pupils with SEND, EAL and other additional needs.

- The Federation will, where possible, provide approved AI accessibility tools through school devices and accounts, so that access is not dependent on family resources.

- Reasonable adjustments under the Equality Act 2010 will be considered when AI tools are either restricted or required for a specific pupil.

11. Training and Development

- All staff receive an annual AI briefing as part of the Federation's safeguarding and data protection updates.

- Staff using AI in their teaching are expected to complete the DfE's free 'Safe and effective use of AI in education' support materials, developed with Chiltern Learning Trust and updated in May 2026; the Chartered College of Teaching's certified AI assessment is recommended for teaching staff.

- Pupils receive age-appropriate teaching on AI literacy through the computing curriculum, PSHE and tutor programmes.

12. Breaches and Sanctions

Breaches of this policy will be dealt with proportionately and educationally, with the focus on putting things right and learning for next time. Serious or repeated breaches will be dealt with under formal procedures.

- Staff: handled under the Staff Code of Conduct and, where appropriate, the Disciplinary Policy. Data breaches will additionally be reported to the DPO and, if required, the ICO.

- Pupils and students: handled under the Behaviour Policy. Suspected academic malpractice follows the Assessment / Malpractice Policy and, for formal qualifications, JCQ procedures.

- Safeguarding-related breaches (e.g. AI-generated harmful imagery) follow the Child Protection and Safeguarding Policy and may be reported to police and/or local authority.

13. Related Policies and Guidance

- Child Protection and Safeguarding Policy
- Online Safety and Acceptable Use Policy
- Behaviour Policy
- Staff Code of Conduct
- Data Protection Policy and Privacy Notices
- Assessment / NEA / Malpractice Policy (Sandy Secondary)
- Curriculum policies (Computing, PSHE)
- DfE 'Generative artificial intelligence (AI) in education' guidance (latest version)
- Keeping Children Safe in Education 2026 (in force 1 September 2026)
- JCQ 'AI Use in Assessments' guidance (revision 2, 30 April 2025, or any later edition)
- DfE 'Generative AI: product safety expectations'
- DfE filtering and monitoring standards for schools and colleges
- UKCIS 'Sharing nudes and semi-nudes: how to respond to an incident'
- Anti-Bullying Policy
- Prevent duty guidance
- Data (Use and Access) Act 2025, UK GDPR and Data Protection Act 2018

14. Monitoring and Review

This policy will be monitored by the Executive Principal, supported by the DSL and DPO, and reviewed at least annually, and sooner in response to changes in DfE, JCQ or KCSIE guidance. The next scheduled review is September 2027.