PENAIR SCHOOL

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Use of Artificial Intelligence (AI) Policy

Policy holder:	Nicola Hosking
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1. Aims and scope

Here at Penair 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, Microsoft Copilot 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 AI Systems: These include publicly available AI models (e.g., ChatGPT, Google Gemini) that continuously learn from user inputs. They may store, share, or learn from the information entered, including personal or sensitive data.
- Closed AI Systems: These are proprietary AI solutions controlled by an organisation (e.g., school-specific AI tools integrated into a school's Learning Management System). Closed systems offer greater security and compliance as external parties cannot access the data that is 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)
- Generative AI: product safety standards, 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

REGULATORY PRINCIPLE	WE WILL …
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 Tim Bareham. 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 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, and 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 SchoolPro and is contactable via dpo@schoolpro.uk

The data protection lead is the Headteacher, and Strategic IT lead is Tim Bareham.

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 Lisette Neesham and is contactable via lneesham@penair.cornwall.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 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
- 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. Staff should be aware that it is prohibited to mark external exam board assessments with the assistance of AI

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 AI lead to discuss any ideas they may have with regards to using AI, so the AI Lead 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, Penair School will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy (https://penair.cornwall.sch.uk/wp-content/uploads/2025/11/Data-Protection-Policy-Autumn-2025.pdf). Please also refer to section 10 of this policy.

Personal and/or sensitive data should only be entered into authorised AI tools if strictly necessary, and with the explicit permission of the school Data Lead, or Strategic Lead for IT. If personal data is to be used for the purpose of decision making processes, then this should be anonymised, and a Data Protection Impact Assessment should be carried out prior to the data entry.

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 (https://penair.cornwall.sch.uk/wp-content/uploads/2025/01/Complaints-Policy-December-2024.pdf).

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 (https://penair.cornwall.sch.uk/wp-content/uploads/2025/04/Equality-and-Diversity-Information-and-Objectives-March-2025.pdf).
- 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 Penair 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.

Pupils are taught about the potential benefits and risks 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.

Pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images

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.

We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our malpractice procedures.

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

The use of AI by students should be driven by the curriculum needs, and under the direction of the class teachers. When a department or faculty identifies an AI tool which they wish to use with students they should make a request for the use of the tool to the AI lead, who will liaise with the HOF, Data Manager, and IT Strategy Group to authorise the use of the tool. AI tools which have not been approved should not be used by students. A list of approved AI tools for students can be found in Appendix 1.

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

Staff will have regular and repeated training on the use of AI, as well as the safeguarding and data protection implications of its use. AI CPD will form a part of the whole school CPD programme, and part of the statutory Safeguarding training each year.

CPD will be coordinated by the school CPD lead with support from the Strategic Lead for IT and the IT Strategy group. The Strategic Lead for IT will ensure that any changes or updates to the AI policy are communicated promptly and effectively to all members of staff.

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 (https://penair.cornwall.sch.uk/wp-content/uploads/2025/10/Child-Protection-and-Safeguarding-Policy-September-2025.pdf).

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 (Staff Code of Conduct - July 2025.pdf).

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 referred to the Headteacher in line with the Governor code of conduct policy.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy (https://penair.cornwall.sch.uk/wp-content/uploads/2025/10/Behaviour-policy-Summer-2025.pdf). and, 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 IT Strategy group 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 Strategic Lead for IT responsible for ensuring that the policy is followed, supported by the network manager.

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

This AI policy is linked to our:

- Data protection policy
- Safeguarding/child protection policy
- Assessment policy
- Exams policy
- Homework policy
- Behaviour policy
- Staff code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy

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 • Governance professional	• Letter to parents/carers • Job descriptions and adverts • Interview questions
Oak Academy AI lesson planner	• Teachers	• Lesson planning
Microsoft Copilot	• All staff • Governors	• Lesson planning • Letter writing • Newsletters • Publicity copy • Lesson resources • Assessment resources
GCSE Pod Access Evo	• Teachers	• Lesson planning • Assessment resources • Automated assessment
NGA Assist (pending SchoolPro compliance check)	• Headteacher • Governors • Governance professional	• Governor administration
Notebook LM	• Teachers • Governance professional	• Lesson resources • Admin resources
Raspberry Pi Foundation: Computer Vision	• Students	• Lesson activity (Yr 8 Computing)
ArtGuru Website	• Students	• Lesson activity (Yr 8 Computing)

Appendix 2: Guidelines for staff when using AI

☑ DO'S	❌ DON'TS
☑ Fact-check AI-generated information before using it	. ❌ Assume AI outputs are always correct or unbiased.
☑ Use AI to assist with lesson planning, resource creation, and administrative tasks.	❌ Let AI fully replace teacher judgment or professional decisions.
☑ Use school-approved, closed AI tools.	❌ Enter personal or sensitive pupil data into public AI tools.
☑ Be transparent—disclose AI use in reports, planning, or educational content.	❌ Allow students to use AI for plagiarism or to bypass independent work.

Document control				
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1	June 2026		New policy Replaced all references to procedure with the term policy throughout. Governance professional added to approved user for KeyGPT (App 1) Added NGA Assist to approved list of AI tools / Added Notebook LM to approved list of AI tools (App 1) Changed 'volunteer code of conduct' to 'governor code of conduct' / Removed link to volunteer code of conduct. (Section 11.2) Added link to Generative AI product safety standards (Section 2) Added 'Staff should be aware that it is prohibited to mark external exam board assessments with the assistance of AI' (Section 5.1) Removed link to exam policies (Section 7)	
	September 2026 October 2026		Added guidance for approving student AI tools (Section 7) Added Raspberry Pi Foundation Computer Vision tool (App 1) Added Artguru website (App 1) Version control implemented at policy approval	