Use of Artificial Intelligence (AI) Policy

Hillborough Infant and Nursery School

Owned and Written by: Headteacher, J Walter	**Date:** September 2026
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This policy has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government Information Sharing Guidance for Practitioners and Managers published in March 2015.	

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1. Aims and scope

Here at Hillborough Infant & Nursery School, we recognise the valuable educational and administrative potential that artificial intelligence (AI), including generative AI, holds for primary education. When deployed responsibly, AI tools can enhance pedagogical methods, support lesson planning, assist with educational resource creation, and improve operational efficiency across the school.

Simultaneously, we are acutely aware of the serious risks associated with AI technologies, including data protection breaches, copyright infringement, algorithmic bias, misinformation, and critical safeguarding threats. As an Infant and Nursery School providing education for young children (aged 3 to 7 years across EYFS and Key Stage 1), safeguarding pupil welfare and maintaining strict data privacy are paramount.

The primary objective of this policy is to establish clear, robust, and ethical guidelines for the secure and responsible deployment of AI technologies across our whole school community. This policy covers all use of AI tools by school staff, governors, and pupils (under teacher direction).

Specifically, this policy aims to:

• Support the safe, ethical, and effective exploration of AI to enhance teaching and learning.

• Support staff to explore approved AI solutions to improve workload efficiency while maintaining professional standards.

• Ensure all AI deployment fully complies with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

• Ensure seamless integration with the Hillborough Safeguarding & Child Protection Policy 2026, keeping children safe from digital and AI-facilitated harms.

• Promote educational equity and digital literacy in an age-appropriate, teacher-led nursery and infant setting.

1.1 Definitions

This policy distinguishes between two fundamental operating models of generative AI tools:

- **Open Generative AI Tools:** Generative AI tools that are publicly accessible over the internet. Inputs entered into open AI platforms may be stored, processed, or re-used by external providers to train public AI models. Examples include public web interfaces of ChatGPT, Claude, and Google Gemini.
- **Closed Generative AI Tools:** Enterprise-grade or walled-garden AI environments operating under strict contractual data protection agreements. Inputs into closed AI tools are isolated, encrypted, and strictly prohibited from being shared with third parties or used for external model training.

2. Legislation

This policy is drafted in alignment with UK statutory legislation, Department for Education (DfE) guidance, and local multi-agency safeguarding standards. It directly incorporates the principles and requirements set out in the following publications:

- **UK General Data Protection Regulation (UK GDPR):** Incorporated into UK law by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.
- **Data Protection Act 2018 (DPA 2018):** Regulating the processing of personal data across educational settings.

Department for Education (DfE) Guidance:

- Generative AI: product safety expectations to support schools (DfE) — View DfE Generative AI Guidance

- Keeping Children Safe in Education 2026 (KCSIE 2026) — View KCSIE Statutory Guidance
- Sharing nudes and semi-nudes: advice for educational settings working with children and young people (DfE) — View DfE Sharing Nudes Advice
- Meeting digital and technology standards in schools and colleges: Filtering and monitoring standards (DfE) — View DfE Filtering Standards
- Working Together to Safeguard Children 2026 (DfE) — View Working Together Guidance
- A pro-innovation approach to AI regulation (DSIT White Paper) — View DSIT White Paper

This policy must be read directly alongside the Hillborough Safeguarding & Child Protection Policy 2026 (approved by the Full Governing Body during Autumn Term 2026).

3. Regulatory principles

We follow the 5 principles set out in the AI regulation white paper.

REGULATORY PRINCIPLE	SCHOOL COMMITMENT & IMPLEMENTATION
Safety, security and robustness	• Ensure all approved AI solutions operate safely, protect personal data, prevent unauthorised access, and maintain technical robustness against cybersecurity threats and filtering bypasses.
Appropriate transparency and explainability	• Maintain open communication regarding where and how AI tools are used across teaching and operations. Ensure staff understand the underlying logic and potential error margins of AI outputs.
Fairness	• Deploy AI tools that are ethically sound, equitable, and free from discrimination. Actively assess and mitigate algorithmic bias, particularly concerning protected characteristics under the Equality Act 2010.
Accountability and governance	• Establish clear lines of responsibility across the Governing Body, Headteacher, DPO, DSL, and staff. AI tools do not replace human judgment or accountability.
Contestability and redress	• Ensure staff and parents can challenge or overrule AI-generated suggestions. Maintain clear procedures for investigating complaints or adverse outcomes arising from AI usage.

4. Roles and responsibilities

4.0 AI lead

Strategic and operational oversight of artificial intelligence across Hillborough Infant & Nursery School is led by the Headteacher as Generative AI Lead. The AI Lead is supported by a multi-disciplinary team comprising:

School Business Manager: Overseeing administrative systems, data protection integration, and procurement contracts.

Computing Subject Coordinator: Guiding curriculum integration, staff digital literacy, and classroom software suitability.

DWM Tech/Entrust IT: External technology support agency under Service Level Agreement (SLA), responsible for infrastructure security, device management, and technical controls.

London Grid for Learning (LGfL): School internet service provider, providing broadband filtering, firewall protection, and threat monitoring.

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 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
  - Review this policy annually alongside the Hillborough Safeguarding & Child Protection Policy.

4.2 Headteacher

The headteacher will:

- Take responsibility for the day-to-day leadership and management of AI use in the school
- 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 the Headteacher & SBM and is contactable via the usual school channels

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 the Headteacher and is supported by the Deputy DSLs and is contactable via school.

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
- 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, agencies that school works with, 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, **Hillborough Infant & Nursery 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 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.

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

At Hillborough Infant & Nursery School, we provide a knowledge-rich curriculum that introduces young children (aged 3 to 7) to digital technology safely, positively, and responsibly. Digital literacy and online safety are embedded within our EYFS Provision, Key Stage 1 Computing Curriculum, and Relationship, Sex and Health Education (RSHE) framework.

Given the age profile of our pupils, education-surrounding technology is strictly teacher-led and age-appropriate. Through guided classroom discussion, storytelling, and structured digital tasks, pupils are taught:

- That AI is a tool that can support our learning but is NOT human or has human attributes
- 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
- As a tool to create content that is in response to a prompt given to an AI tool
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or during art sessions 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:

- To complete any homework projects, 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.

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

9. Staff training

Hillborough Infant & Nursery School will carry out the following to demonstrate how staff will be kept up to date with developments in AI, and how they will be able to develop and improve their practice on a regular basis.

School will undertake the following:

- Staff induction will contain a session that covers policy, procedures and use of AI in school. Staff will sign relevant document to say that they have read and understood
- Termly CPD for staff around policy, what is being used in school and how
- Termly CPD for content specific use of AI – this will be led by the lead for computing and will be led by monitoring of need and also staff requests
- Regular monitoring and assessment of staffs understanding of AI
- Regular staff training on safe internet use and online safeguarding
- The person who will be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI, will be those listed at the start of the policy
- Those listed at the start of the policy will endeavour to stay abreast of good practice and through a range of mechanisms will ensure that it is shared at the right time, in an accessible way and monitored through daily practice

10. Referral to our child protection and safeguarding policy

Specific AI-related safeguarding risks recognized under this policy and the 2026 Child Protection Policy include:

1. AI-Generated Nudes, Deepfakes, and Pseudo-Images: The creation, manipulation, or distribution of nude or semi-nude digital imagery, deepfakes, or computer-generated pseudo-images involving under-18s using AI text-to-image generators or editing software. All such incidents are managed strictly under Section 14 and Appendix 8 (Youth-Produced Sexual Imagery) of the Hillborough Safeguarding & Child Protection Policy 2026.

2. AI-Facilitated Grooming and Extortion: Online grooming, sexual harassment, or financial extortion facilitated by AI chatbots, social media bots, or synthetic personas. Managed under Section 14 and Section 21 of the Child Protection Policy.

3. Misinformation, Extreme Narratives, and Radicalisation: Exposure to harmful, extreme, discriminatory, or radicalising content generated by unvetted AI tools. Managed under Section 16 and Appendix 6 (Prevent Duty) of the Child Protection Policy.

4. Cybercrime and Network Exploitation: Unauthorised access, illegal hacking, or deliberate attempts to bypass school network security and filtering systems using AI scripts or tools. Managed under Section 27 (Cybercrime) of the Child Protection Policy.

5. Cyberbullying and Child-on-Child Abuse: Use of digital technology or AI tools to facilitate peer-on-peer harassment, derogatory messaging, or targeted bullying. Managed under Section 18 (Child-on-Child Abuse) of the Child Protection Policy.

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 accordance to Local Authority Policy, local and national guidance and that set out in the NGA guidance. If appropriate or relevant, school will make contact with the police or other agencies e.g. ICO. School appreciates that the role of governor is voluntary one but will follow all guidance as listed.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy. If appropriate or relevant, school will make contact with the police or other agencies e.g. ICO

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 lead and supportive team, 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. Those listed at the start of the policy and SLT are responsible for ensuring that the policy is followed.

Those listed at the start of the policy and SLT 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

- Therapeutic Thinking: Behaviour & Relationships 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. Other tools will be added to the list, as and when approved.

APPROVED TOOL	ENVIRONMENT	APPROVED USERS & SCOPE	STRICT CONSTRAINTS & PROHIBITED INPUTS
Google Workspace for Education / Gemini Enterprise	Closed / Enterprise	Teaching Staff & SLT (Lesson ideation, admin efficiency, drafting letters)	Strictly no confidential safeguarding notes or unredacted pupil SEN files.
ChatGPT (Public Web Interface)	Open Generative AI	Teaching Staff & Governors (Generic lesson prompts, policy structure research)	ABSOLUTELY NO pupil names, DOBs, photos, SEN data, or identifiable staff details. Fact-checking mandatory.
Canva for Education (AI Design Tools)	Closed / Education	Teaching Staff & Computing Lead (Creating visual classroom resources, storyboards)	Images must not include unconsented pupil photographs or identifiable pupil artwork.
LGfL Educational Digital Suite	Closed / Walled Garden	Staff under teacher-led classroom instruction	Restricted to teacher-supervised educational activities. Filtered via LGfL broadband safety controls.