

Artificial Intelligence (AI) Use Policy

For staff, pupils, governors, contractors and volunteers

Policy owner	Headteacher / Senior Leadership Team
Operational lead	IT Lead / Data Protection Lead
Applies to	All use of AI tools for schoolwork, learning, administration and communication
Approved by	Sarah Stokes
Approval date	September 2026
Review date	September 2028
Version	1.0

1. Purpose

This policy sets out how Greater Manchester Independent School uses artificial intelligence, including generative AI tools that create text, images, audio, code, summaries, lesson materials, quizzes, feedback or analysis from prompts. It gives staff and pupils clear rules for safe, fair and responsible use.

2. Scope

This policy applies to all AI use connected with school activity, whether using school devices, personal devices, school accounts, personal accounts, browser tools, apps, extensions, Microsoft 365 features, search tools, image generators, translation tools, lesson planning tools or third-party education platforms.

3. Policy statement

The school recognises that AI can support teaching, learning, accessibility, administration and productivity. However, AI outputs can be inaccurate, biased, inappropriate, outdated or unsafe. AI must therefore be used transparently, proportionately and under human oversight. The school remains accountable for decisions, content and data handling even where AI has assisted.

4. Definitions

Term	Meaning
AI	Computer systems or tools that perform tasks normally requiring human intelligence, such as generating text, analysing data, recognising patterns or creating images.
Generative AI	AI that creates new content, such as text, images, audio, video, code, quizzes, feedback or summaries.
Prompt	The instruction, question, file or information entered into an AI tool.
Personal data	Information that identifies, or could identify, a living person, including pupils, parents, staff and visitors.
Special category data	More sensitive personal data, such as health, biometric, ethnic origin, religious belief or trade union information.
High-risk use	AI use that could affect safeguarding, behaviour, SEND decisions, admissions, employment, assessment outcomes, personal data, equality, wellbeing or legal rights.

5. Core principles

Human responsibility: AI may assist, but a named member of staff remains responsible for checking, approving and using any AI-assisted output.

Privacy by default: Do not enter personal, confidential, safeguarding, medical, behaviour, SEND, assessment or staff HR information into AI tools unless the tool has been formally approved and a lawful basis, DPIA and data-processing terms are in place.

Safeguarding first: AI must never be used in a way that exposes pupils to harmful content, grooming, bullying, discrimination, sexual content, extremist content, self-harm content or unsafe advice.

Fairness and inclusion: AI must not be used to make or automate decisions about pupils or staff. Outputs must be checked for bias, stereotypes, discrimination and accessibility issues.

Transparency: Staff and pupils must be clear when AI has been used in a way that materially contributes to submitted work, communication, published material or decision-making support.

Accuracy and verification: AI outputs must be checked against reliable sources before use. AI must not be treated as an authoritative source.

Age-appropriate use: Pupil access to AI tools must be age-appropriate, supervised where required, and aligned with curriculum aims.

Security: AI tools, browser extensions and connected apps must not be installed, enabled or connected to school accounts without approval.

6. Approved and prohibited uses

6.1 Staff may use approved AI tools for:

- drafting lesson ideas, quizzes, examples, worksheets or differentiated resources, provided they are checked before use
- summarising non-confidential information or publicly available documents
- creating first drafts of general letters, policies or guidance, provided staff review and adapt them
- generating ideas for displays, assemblies, activities or curriculum planning
- supporting accessibility, such as simplifying text, creating reading-level alternatives or suggesting vocabulary support
- administrative productivity where no personal or confidential data is entered
- technical support and troubleshooting where no secrets, credentials, personal data or sensitive infrastructure details are exposed to unapproved systems

6.2 Staff must not use AI to:

- make safeguarding decisions or decide whether a concern should be reported
- assess risk, behaviour, wellbeing, SEND need, admissions, exclusions, complaints, recruitment or disciplinary matters without human professional judgement
- enter names, contact details, pupil records, staff records, safeguarding notes, medical details, assessment data, EHCP/SEND records, photographs or CCTV images into unapproved AI tools
- generate pupil reports, references, disciplinary letters or sensitive communications using identifiable pupil information in unapproved tools
- create deepfakes, impersonations, realistic fake images/audio/video of pupils, staff or parents
- bypass filtering, monitoring, copyright restrictions, exam rules or assessment integrity
- allow AI-generated content to be sent to parents, pupils, governors or external bodies without staff review
- connect personal AI accounts or browser extensions to school Microsoft/Google accounts unless approved by IT

6.3 Pupils may use AI only when:

- a teacher has specifically permitted it for that task
- the use supports learning rather than replacing the required thinking, reading, writing, practice or skill development
- they follow the assessment instructions and declare AI assistance where required
- they do not enter personal information about themselves or others
- they do not use AI to bully, harass, impersonate, sexualise, humiliate or mislead others

6.4 Pupils must not use AI to:

- complete work that has been set to assess their own knowledge, effort or skill unless the teacher has explicitly allowed AI assistance
- submit AI-generated work as if it is entirely their own
- create or share fake images, fake messages, fake audio, deepfakes or impersonations
- generate harmful, sexual, extremist, discriminatory, abusive or self-harm-related content
- attempt to bypass school filtering, monitoring or restrictions
- upload images, recordings, school documents or details about other people into AI tools without permission

6.5 Recording, transcription and meeting summaries

No member of staff, pupil, parent, visitor, contractor, governor or other person may use any form of technology to record, transcribe, photograph, film, stream, summarise or otherwise capture meetings, conversations or interactions involving staff or pupils on school premises or during school-related activities, unless this has been expressly authorised in advance by the Headteacher or another member of the Senior Leadership Team.

This includes, but is not limited to, mobile phones, tablets, laptops, smart watches, wearable devices, cameras, voice recorders, AI assistants, transcription tools, meeting bots, video-conferencing tools, screen-recording tools and automated note-taking services.

Authorisation will only be given where there is a clear lawful, safeguarding, educational, accessibility or operational reason, and where appropriate data protection, consent, storage, retention and access arrangements are in place.

Covert or unauthorised recording may be treated as a serious breach of this policy, the school's Acceptable Use Policy, safeguarding expectations, confidentiality requirements and, where relevant, staff or pupil disciplinary procedures.

7. Data protection and confidentiality

The school will treat AI use as a data protection matter where personal data is involved. AI tools may collect prompts, uploaded files, account information, technical information and generated outputs. Some tools may use inputs for model improvement unless this is contractually disabled.

- Staff must not put personal data into public or personal AI tools.
- Before approving an AI tool that processes personal data, the school must complete appropriate due diligence, including supplier checks, data protection terms, privacy information and, where required, a Data Protection Impact Assessment (DPIA).
- The school must be able to explain what data is processed, where it is processed, how long it is retained, whether it is used for training, and how data subject rights can be exercised.
- Personal data must be minimised. Where possible, use anonymised or synthetic examples rather than real pupil or staff information.
- AI-generated records must not be copied into official pupil, safeguarding, HR or assessment records unless reviewed and approved by an appropriate member of staff.
- Staff and pupils must not use any technology, including AI tools, to record, transcribe, photograph, film, stream or summarise meetings or conversations involving staff or pupils unless this has been expressly authorised in advance by the Headteacher or Senior Leadership Team.

8. Safeguarding and online safety

- Any AI-related safeguarding concern must be reported through the school safeguarding procedures immediately.
- AI misuse involving sexualised images, nude/part-nude images, coercion, threats, impersonation, grooming, extremist content or self-harm content must be treated as a serious safeguarding incident.
- Staff must not rely on AI for advice about whether to report a safeguarding concern. The Designated Safeguarding Lead must be involved according to existing procedures.
- Pupil-facing AI tools must have age-appropriate content filtering, moderation and safety controls before use.
- The school will teach pupils that AI can produce convincing but false information, biased outputs and unsafe advice.

9. Teaching, learning and assessment

- Teachers should design tasks so that AI use is either clearly permitted, clearly restricted, or explicitly prohibited. Ambiguous homework tasks should be avoided.
- Where AI is permitted, teachers should explain what level of use is acceptable, for example brainstorming, vocabulary support, feedback on structure, translation support, coding hints or image creation.
- Where independent work is required, teachers may use in-class writing, oral questioning, drafts, version history, supervised assessment, practical demonstration or viva-style discussion to confirm authorship.
- AI detection tools must not be used as the sole evidence of misconduct. Concerns should be considered alongside normal assessment evidence and professional judgement.
- Pupils should be taught how to acknowledge AI use. A simple declaration may be: "I used [tool name] to [describe use]. I checked and edited the output myself."

10. Staff use in communication and published materials

- AI may be used to draft general communications, but staff must check tone, accuracy, confidentiality and appropriateness before sending.
- AI must not invent facts, quotes, events, policy positions, legal obligations or pupil information.
- AI-generated images, audio or video used in school materials must be checked for copyright, bias, accuracy and appropriateness.
- Any material contribution by AI to public-facing content should be disclosed where transparency would reasonably be expected.

11. Procurement and approval of AI tools

No AI tool may be introduced for school-wide, staff-wide or pupil-facing use until it has been approved. Approval should include the following checks:

- educational purpose and benefit
- age suitability
- safeguarding risks and controls
- filtering and moderation arrangements
- UK GDPR and Data Protection Act compliance
- supplier data processing agreement
- whether prompts or files are used to train models
- data location, retention and deletion
- access controls and account management
- licensing, cost and exit arrangements
- accessibility and equality considerations
- monitoring, audit logs and incident reporting
- copyright and intellectual property terms

12. Security and technical controls

- IT will maintain a list of approved AI tools and any blocked or restricted AI services.
- AI browser extensions, plug-ins and app integrations require approval before installation or connection to school accounts.
- Staff and pupils must not enter passwords, API keys, security tokens, network diagrams, sensitive configuration data or confidential troubleshooting logs into unapproved AI services.
- Where possible, approved AI services should use school-managed accounts, MFA, role-based access and appropriate logging.
- AI access may be restricted by age, role, device group, location, filtering category or safeguarding requirement.

13. Copyright and intellectual property

- Staff and pupils must not assume AI-generated content is copyright-free.
- AI should not be used to copy, reproduce or imitate protected materials, living artists, authors or commercial brands in a way that infringes rights.
- Pupils should not upload copyrighted textbooks, exam papers, paid resources or third-party materials to AI tools unless the licence allows it.
- School-created prompts, resources and outputs should be managed in line with normal school ownership and retention expectations.

14. Equality, bias and accessibility

- AI outputs must be checked for discriminatory assumptions, stereotypes or biased treatment linked to protected characteristics.
- AI must not be used to profile pupils or staff or predict behaviour, ability, risk or suitability.
- AI can be used to support accessibility, but reasonable adjustments and SEND support remain professional decisions.
- When AI is used to create resources, staff should check reading level, cultural sensitivity, representation and accessibility.

15. Records, transparency and declarations

- The school will maintain an Approved AI Tools Register.
- Staff should record AI use where it materially contributes to policy, published material, assessment materials, official communication or administrative records.
- Pupils must declare AI use when required by the task or assessment instructions.
- The school privacy information should describe approved AI processing where personal data is involved.

16. Training and awareness

- Staff will receive guidance on safe AI use, data protection, safeguarding, assessment integrity and checking outputs.
- Pupils will receive age-appropriate teaching on AI literacy, misinformation, bias, online safety, privacy, copyright and academic honesty.
- Governors and leaders will receive enough information to oversee risk, benefit and compliance.

17. Breaches and misuse

- Misuse of AI may be handled under the staff code of conduct, pupil behaviour policy, acceptable use policy, safeguarding policy, data protection policy or disciplinary procedures.
- Suspected data breaches must be reported immediately to the Data Protection Lead/DPO according to the school data breach procedure.

- Serious AI misuse involving harmful content, sexual imagery, impersonation, bullying, harassment, extremism or safeguarding risk must be escalated immediately.
- The school may restrict or withdraw access to AI tools where there is misuse, risk or non-compliance.

18. Roles and responsibilities

Role	Responsibility
Governing Body	Approve the policy, oversee risk and ensure leaders have appropriate controls in place.
Headteacher / SLT	Set expectations, approve school-wide AI use and ensure the policy is implemented.
Designated Safeguarding Lead	Lead safeguarding response to AI-related incidents and advise on pupil-facing risks.
Data Protection Lead / DPO	Advise on DPIAs, privacy information, supplier checks and data breach response.
IT Lead	Manage approved tools, access controls, filtering, security restrictions and technical support.
Teachers and support staff	Use AI responsibly, check outputs, protect data and guide pupils appropriately.
Pupils	Use AI only as allowed, declare use when required and avoid harmful or dishonest use.
Parents/carers	Support safe, honest and age-appropriate AI use outside school.

19. Approved AI Tools Register

The following register should be maintained by IT/SLT and reviewed regularly. Do not add tools to this table until they have been approved.

Tool	Users	Status	Review date
Microsoft Copilot	Staff	Approved	01/09/2027
ChatGPT/OpenAI	Staff	Approved	01/09/2027

20. Quick rules for staff

- Use AI to help you think, plan and draft - not to replace your professional judgement.
- Never put pupil, parent, staff, safeguarding, SEND, medical, behaviour, HR or confidential data into unapproved AI tools.
- Check every AI output before using it. AI can sound confident and still be wrong.
- Be clear with pupils when AI is allowed and when it is not.
- Report safeguarding, data protection or security concerns straight away.
- Do not record, transcribe or use AI meeting assistants in meetings or conversations involving staff or pupils unless this has been expressly authorised in advance by SLT.

21. Quick rules for pupils

- Only use AI for schoolwork when your teacher says you may.
- Do not submit AI work as your own.
- Do not put personal details, photos or information about other people into AI tools.
- Do not use AI to create fake, bullying, sexual, harmful or misleading content.
- When allowed to use AI, explain how you used it.
- Do not record, photograph, film or use AI tools to capture meetings, lessons or conversations with staff or other pupils unless a teacher has clearly allowed it.

22. Linked policies

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Acceptable Use Policy
- Data Protection Policy
- Staff Code of Conduct
- Behaviour Policy
- SEND Policy
- Equality and Diversity Policy

23. Review

This policy will be reviewed every 2 years, and sooner if there are significant changes to AI tools, legislation, DfE guidance, safeguarding risks, data protection requirements or school systems.

Appendix A - AI use decision guide

Question	If yes	If no
Does the tool process personal data?	Seek Data Protection Lead/DPO review before use.	Continue to next question.
Will pupils use it directly?	Check age suitability, safeguarding, filtering, moderation and supervision.	Continue to next question.
Could it affect a decision about a pupil or staff member?	Do not automate the decision. Human professional judgement required.	Continue to next question.
Could the output be used publicly or with parents?	Check accuracy, tone, copyright and transparency before publishing/sending.	Continue to next question.
Is the tool approved?	Use within the approved limits.	Do not use for school work until reviewed.

Appendix B - Example AI declaration wording

- No AI used: "I did not use AI tools for this work."
- AI used for ideas: "I used [tool] to generate initial ideas. I selected, checked and developed the final work myself."
- AI used for language support: "I used [tool] to help improve grammar/wording. The ideas and final checks are my own."
- AI used for feedback: "I used [tool] to suggest improvements to structure. I chose which suggestions to use."
- AI not permitted: "AI tools were not permitted for this task. Use may be treated as academic misconduct."

Appendix C - References and guidance used

- Department for Education, "Generative artificial intelligence (AI) in education", updated 12 August 2025.
- Department for Education, "Generative artificial intelligence (AI) and data protection in schools", data protection in schools guidance.
- Department for Education, "Generative AI: product safety standards", published 22 January 2025 and updated 19 January 2026.
- Information Commissioner's Office, "Artificial intelligence (AI) and data protection".
- DfE Education Hub, "AI in schools and colleges: what you need to know", 10 June 2025.