

Generative Artificial Intelligence Policy



Berriew CP
School

Written February 2026

Introduction

Our school recognises that generative artificial intelligence (gen AI) is becoming an increasingly significant part of everyday life, education and the workplace. Gen AI tools can generate text, images, audio and other content and are already widely used beyond education. As such, schools have a responsibility to ensure that learners and staff understand how these technologies work and how to use them safely, ethically and responsibly.

This policy outlines how gen AI may be used in our school to support learning and teaching, staff workload, and school operations, while ensuring that safeguarding, data protection, wellbeing and equity remain central to all decisions.

Statement of Intent

Our school acknowledges that gen AI offers opportunities to enhance learning, creativity and professional practice. Used appropriately, gen AI can support lesson planning, personalised learning, administrative efficiency and the development of digital literacy skills.

However, we also recognise that gen AI presents risks, including issues relating to safeguarding, data protection, bias, misinformation and over-reliance on technology. These risks will be mitigated through clear expectations, staff training, safeguarding procedures and adherence to existing school policies.

The safeguarding and wellbeing of learners and staff will always be our priority.

Legislative Background and Key Documents

The UK Online Safety Act 2023 is designed to make the internet safer, particularly for children and vulnerable users, by regulating online content and holding tech companies accountable for harmful material. Ofcom is the online safety regulator in the UK and is responsible for publishing codes of practice and guidance on how companies can comply with their duties. Wherever use of gen AI includes use of personal data then data protection law applies, and the ICO is the

relevant regulator. ICO has useful online guidance about the [data protection aspects of using AI](#), and has been commissioned by the UK Government to develop a statutory code of practice on Ed Tech. In addition, the [ICO's Children's Code](#) sets statutory standards that providers of online services to children must meet.

There is currently no specific legislation regarding the use of gen AI in schools, but guidance has been developed and is being regularly updated as the technology evolves. Schools may wish to consult the following resources:

- [Generative artificial intelligence in education – opportunities and considerations for schools and settings](#)
- [Generative AI: Keeping learners safe online](#)
- [AI foundations online training module](#)
- [Hwb - What is artificial intelligence: video produced by the Wales Collaborative for learning design](#)
- [AI Roadmap - GOV.UK](#)
- [AI Opportunities Action Plan \(UK Government\)](#)
- [Ofcom's 2024 Online Nation Report](#)
- [EU Artificial Intelligence Act 2024 - Useful high-level 4-point summary of considerations](#)
- [UNESCO AI Competency Framework for Students \(Guidance\)](#)
- [UNESCO AI Competency Framework for Staff \(Guidance\)](#)
- [Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK](#)
- [Guidance on AI and data protection | ICO](#)
- [What is personal data? | ICO](#)
- [AI and cyber security: what you need to know - NCSC.GOV.UK](#)

Context

Generative artificial intelligence (gen AI) is a rapidly developing area of digital technology that enables computer systems to create text, images, audio and other

content. Recent advances in this technology mean that gen AI tools are becoming increasingly common in everyday life and are already being accessed by many children outside of school, often to support homework tasks, search for information or create digital content.

Gen AI has the potential to support learning, creativity and efficiency when used appropriately. However, it also presents risks, including concerns around online safety, data protection, accuracy, bias, over-reliance on technology and equity of access. Children may not always understand how these tools work or be able to recognise their limitations without guidance and support.

As a school, we recognise our responsibility to respond thoughtfully to this changing digital landscape. In line with *Keeping Learners Safe* and the *Curriculum for Wales*, we aim to support learners to develop the knowledge, skills and dispositions needed to engage with gen AI safely, ethically and critically. This includes helping learners to question information, think creatively, and understand that gen AI tools do not replace learning, originality or human judgement.

The school is committed to harnessing the potential benefits of gen AI where appropriate, while ensuring that safeguarding, wellbeing, data protection and inclusivity remain central to all decisions. Clear guidance, staff training and ongoing review will ensure that gen AI is used responsibly and in ways that support positive learning experiences for all learners.

Statement of intent

Artificial intelligence (AI) is increasingly present in everyday life and is becoming more widely used within education. Our school recognises that generative AI tools can offer valuable opportunities to enhance learning and teaching, support creativity and assist staff with certain aspects of workload when used appropriately.

At the same time, we acknowledge that the use of gen AI must be carefully managed. All use will be guided by clear expectations that prioritise safety, ethical practice, data protection, inclusivity and professional responsibility.

We recognise that there are potential risks associated with gen AI, including safeguarding, privacy and over-reliance on technology. These risks will be mitigated through our existing safeguarding, online safety and data protection

policies, which will be reviewed and updated as necessary to reflect emerging technologies.

Our school is committed to educating both staff and learners about the safe, responsible and ethical use of gen AI, helping to prepare them for a future in which AI technologies are likely to play an increasing role. As always, the safeguarding and wellbeing of learners and staff will remain at the centre of all policy and practice.

Policy statements

- The school recognises that generative artificial intelligence (gen AI) can offer positive benefits within an educational setting, including supporting learning and teaching, assisting with certain administrative tasks, managing workload and preparing staff and learners for a future in which AI technology is increasingly present. Where appropriate, staff may use gen AI tools to support their work, within the expectations and safeguards set out in this policy. Staff remain professionally responsible and accountable for all outcomes.
- The school will comply with all relevant legislation and statutory guidance, including *Keeping Learners Safe*, data protection law and online safety requirements.
- Appropriate training can be provided for staff and governors to develop understanding of the benefits, limitations and potential risks of gen AI. Staff will be supported to identify further professional learning needs related to the safe and effective use of emerging technologies.
- Learning about gen AI will be incorporated into the curriculum where appropriate, in line with the Curriculum for Wales. Learners will be supported to understand how gen AI works, its potential benefits and risks, and the ethical and social implications of its use. The school recognises the importance of equipping learners with the skills and strategies needed to engage with gen AI critically and responsibly.
- In line with the Staff Acceptable Use Agreement, staff will be supported to use gen AI responsibly and ethically, ensuring the protection of personal, sensitive and confidential information at all times.
- Staff must ensure that any gen AI tools used for school purposes comply with UK GDPR and other relevant data protection legislation. Advice will be

sought from the Data Protection Officer (DPO) before any new tool is used for school-related work.

- Staff are expected to carefully consider the use of any gen AI tool and to involve senior leadership where appropriate in decisions relating to its use.
- Staff must use school-provided accounts and systems for professional purposes. These are configured to meet the school's security, monitoring and safeguarding requirements.
- Personal data, learner information and other sensitive or confidential material must not be entered into gen AI tools unless explicitly approved through the appropriate data protection processes.
- The school will ensure that the use of gen AI does not infringe copyright or intellectual property rights. Care will be taken to protect learners' work and ensure that content is not used to train AI systems without appropriate consent.
- Any incidents involving the misuse of gen AI, data breaches or inappropriate outputs must be reported immediately in line with school safeguarding and data protection procedures.
- The school will maintain a record of approved gen AI tools in use, their intended purpose and associated risks. Risk assessments will be reviewed regularly.
- The school recognises the potential for bias or discrimination in AI-generated outputs and will take steps to identify, challenge and address any issues that arise. When considering the use of gen AI tools, fairness, safety and inclusivity will be prioritised.
- Parents and carers will be supported in understanding how gen AI is used within the school through appropriate communication, such as information shared via the school website, newsletters or meetings.
- Where gen AI is used to support learning and teaching, its use will be purposeful, considered and clearly focused on enhancing understanding and learning outcomes, while managing and minimising risk.
- Staff will ensure transparency by clearly indicating where gen AI has supported the creation of documents, presentations or communications.
- All AI-generated content must be reviewed and checked for accuracy, appropriateness and bias before being shared or published.
- Misuse of gen AI, including breaches of data protection, inappropriate use of information or failure to follow this policy, may result in action being taken in line with the school's disciplinary procedures.

Responsibilities

Headteacher and Senior Leaders

Are responsible for the strategic planning of how gen AI will be used in the school, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

Designated Safeguarding Person (DSP) / Online Safety Lead

Our Designated Safeguarding Person / Online Safety Lead has responsibility for online safety in the school. They are expected to have knowledge of gen AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff where necessary.

Data Protection Officer (DPO)

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of gen AI, including related Data Protection Impact Assessments (DPIAs) which will be undertaken when considering use of any digital tools and services that may use personal data. Where personal data will or may inadvertently be used the school will ensure that data subjects rights are upheld. In these cases, privacy notices will be provided.

Technical Staff

Technical staff / IT Leads will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems.

Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any

incidents or suspected incidents concerning the use of gen AI in line with school policy. All staff will challenge any inappropriate behaviour.

Staff have a duty to ensure that:

- the school environment is safe
- all personal, sensitive and confidential data / information is secure
- that their actions do not put the reputation of the school at risk
- learners understand their responsibilities

Governors

We ensure that our governing body has a good understanding of how gen AI is used in a school context along with the potential benefits and risks of its use. They receive regular training and updates, enabling them to support the school and challenge where necessary. This may include evaluation of the use of gen AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated.

Parents/carers

We work hard to engage parents and carers by:

- in school sessions
- sharing information online e.g., Dojo, website, social media, newsletter
- providing curriculum information

Our parents and carers are made aware of how gen AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their child's learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.

Vulnerable groups

We recognise that vulnerable learners are more likely to be at risk from the misuse of gen AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of gen AI, while being aware of the potential risks.

Children are considered vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". As set out above, a thorough DPIA is essential.

Reporting

Our reporting systems are easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties.

Concerns can be reported through:

- a nominated member of staff, such as the class teacher, Designated Safeguarding Lead or a member of the senior leadership team
- established school reporting procedures, in line with safeguarding and online safety policies
- the school's online or offline reporting systems, where available
- confidential or anonymous reporting routes
- signposting to relevant local or national organisations, where appropriate

Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All gen AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, local authority, DPO, ICO. Any breaches must be reported to ICO within 72hrs of school becoming aware a breach has occurred.
- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of gen AI by staff, the normal staff disciplinary processes will be followed. If the misuse involved personal data and was deliberate / negligent, could constitute a criminal offence under S170 of the Data Protection Act 2018.

Risk assessment

Our approach to managing risk in relation to generative AI aligns with, and supports, our wider safeguarding and risk management procedures. While the school recognises the potential benefits of using generative AI, we also acknowledge that its use may present a range of risks which must be carefully identified, assessed and managed.

These risks may include, but are not limited to:

- legal, commercial, security and ethical considerations
- data protection and privacy
- cyber security
- fraud and misuse
- safeguarding and well-being
- duty of care towards staff and learners

The school will take appropriate steps to mitigate these risks through existing policies, staff training and ongoing review.

Education and training

Our school aims to develop knowledge, understanding and critical awareness of emerging digital technologies, including generative AI. We recognise the growing

role these technologies play in education and wider society and are committed to ensuring they are used in a way that is safe, responsible and purposeful.

This policy sets out our approach to integrating generative AI within the school environment to support teaching, learning and professional practice. Where appropriate, generative AI may be used to support activities such as:

- assisting with some routine administrative tasks
- supporting lesson planning, marking, feedback and reporting
- helping to provide more personalised learning experiences
- offering contexts to support the development of critical thinking and digital literacy
- supporting school-level curriculum and assessment design

AI literacy, including the ability to think critically, evaluate information, verify sources and use creativity, is central to this approach. These skills closely align with the four purposes of the Curriculum for Wales and are developed across all Areas of Learning and Experience. Our school will ensure that learning about generative AI is introduced where it is relevant, age-appropriate and meaningful within the curriculum.

Our approach is given appropriate time and is authentic, reflecting current national, local and school-level issues, including our own risk profile. It is shaped through engagement with learners, staff, parents and carers, ensuring that our practice remains responsive, inclusive and evolving. This is supported through:

- engagement with learners
- critical evaluation of emerging research and trends
- consultation with staff
- parental engagement
- surveys and feedback
- seeking advice from technical experts and the Data Protection Officer
- ongoing staff training

As generative AI becomes an increasingly prominent feature of education, it is important that staff are supported to develop the knowledge, confidence and skills needed to use these tools responsibly. By building AI literacy, staff are better equipped to prepare learners for a future in which AI will play a significant role.

The school will ensure that all staff have access to appropriate training on the effective, lawful, ethical and safe use of generative AI and other emerging technologies. This will include:

- integrating AI-related risks and safeguards into annual safeguarding training, in line with statutory guidance, including *Keeping Learners Safe*
- supporting staff to identify, assess and mitigate risks such as bias, privacy breaches and harmful content
- supporting compliance with UK GDPR and other relevant legislation
- promoting ethical use of AI that supports equity, fairness and inclusivity
- empowering staff to teach learners about the safe and ethical use of generative AI, fostering informed decision-making and digital resilience

Supporting resources

The school draws on a range of trusted guidance and training materials, including:

- [Generative AI – Hwb guidance](#) - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- [Hwb – Sharing nudes and semi-nudes: Responding to incidents and safeguarding children and young people](#)
- Common Sense Education [AI literacy](#) and [digital citizenship](#) materials
- [Curriculum for Wales – Hwb](#)
- [AI Foundations: training module for education practitioners](#)
- [Generative AI – Hwb guidance](#) - Resources, guidance and information for education practitioners, learners, and families on gen AI.
- [ICO school resources](#)

Risk assessment

Risk Area	Risk Description	Likelihood (L/M/H)	Impact (L/M/H)	Risk Level (L/M/H)	Mitigation Measures
Gen AI training	Insufficient training or guidance impacting the ability of staff to adopt, use, and monitor gen AI safely and ethically within their school.	L	H	M	Ensure all staff can access regular training to support the safe and ethical use of gen AI in teaching and learning.
Data Protection and Privacy Breaches	Complexity of the tech and contracts will make it hard for schools to fully understand what use the gen AI provider will make of data inputted (including inadvertent provision of personal data). Unauthorised access to sensitive data or personal information, leading to	L	H	M	Due diligence including advice from DPO before signing contract. Implement strong encryption, regular audits, and UK GDPR-compliant data management policies and conduct regular privacy audits.

	safeguarding concerns and commercial risk.				
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.	L	H	M	Monitor gen AI communication tools, implement clear reporting mechanisms, and provide learner support.
Over-reliance on gen AI	Over-reliance on gen AI tools reducing interpersonal interactions among learners. Reduction in teacher autonomy and critical decision-making by overusing gen AI tools.	L	H	M	Encourage collaborative learning activities and balance gen AI use with social engagement. Define clear boundaries for gen AI use and regularly review its impact on pedagogy.
Emotional Manipulation	Gen AI systems unintentionally affecting learner mental health through curated content.	L	H	M	Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	Gen AI exposing learners to harmful or unsuitable materials / behaviour	L	H	M	Conduct rigorous testing of gen AI tools, apply effective filtering and monitoring and ensure human oversight.

Mental Health Impacts	Overuse of gen AI tools causing stress, anxiety, or dependency in learners.	L	H	M	Monitor usage patterns, provide mental health resources, and set expectations on use of gen AI systems.
Bias and Discrimination	Gen AI systems propagating biases that impact learner well-being or inclusion. Gen AI models producing discriminatory or biased outcomes.	L	H	M	Regularly audit gen AI algorithms for bias and provide inclusive media literacy education and training.
Misuse of AI	Learners using gen AI tools for harmful, unethical or illegal purposes (e.g. nudification).	L	H	M	Educate learners on responsible and appropriate gen AI use and establish clear usage policies.
Misinformation	Creation or spread of harmful or misleading AI-generated content.	L	H	M	Educate staff and learners to verify gen AI outputs and establish clear policies for verifying content authenticity.
Digital Divide	Inequitable access to gen AI tools among learners from diverse demographic groups.	L	H	M	Provide equitable access to gen AI resources and ensure alternative solutions are available.

AI Ethics Awareness	Lack of awareness among staff and learners about ethical implications of gen AI.	L	H	M	Provide training and education on gen AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	Gen AI systems generating inaccurate or misleading recommendations.	L	H	M	Regularly validate gen AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding gen AI usage and learner data.	L	H	M	Understand legal requirements. Conduct legal reviews and consult experts on gen AI-related regulations.
Cyber-Security	Increased use of gen AI tools in cyberattacks targeting school systems and data.	L	H	M	Strengthen cybersecurity protocols and educate staff and learners on safe online practices.

Likelihood and Impact Definitions

- **Likelihood:** The likelihood that the identified risk will occur.
 - Low: Unlikely to occur under normal circumstances.
 - Medium: Possible occurrence based on past trends or vulnerabilities.
 - High: Likely to occur without intervention.

- **Impact:** The severity of impact should the risk materialise.
 - Low: Minimal disruption with limited consequences.
 - Medium: Moderate disruption affecting key processes.
 - High: Significant disruption with severe consequences.

Appendix 2 Staff (and Volunteer) Use of Generative AI (Gen AI) Acceptable Use Agreement

School Policy

Emerging technologies, including gen AI, are increasingly integrated into educational settings and the lives of staff and learners. These technologies have potential to enhance creativity, promote personalised learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, ethical application and legal compliance.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of gen AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of gen AI.
- Staff have a clear understanding of their responsibilities when engaging with gen AI and emerging technologies in professional and personal contexts.

Acceptable Use Policy Agreement

I understand that I must use gen AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of gen AI tools and technologies.
- I will only use gen AI tools and technologies for purposes authorised by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, learners, or parents/carers is only entered into gen AI systems that have been through a DPIA process.
- I will report any gen AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt gen AI outputs.
- I will critically evaluate the outputs of gen AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight and in compliance with the UK GDPR.
- I will communicate professionally and responsibly when using gen AI systems.
- I will ensure transparency by ensuring attribution where gen AI has been used and providing a privacy notice if personal data has been used.

When engaging with learners:

- I will support learners on the safe, ethical, appropriate and effective use of gen AI.

- I will use gen AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the school's systems and resources:

- I will use gen AI systems in compliance with established security measures and access protocols.
- I will ensure that any gen AI applications used in teaching or administration are vetted by the DPO and comply with the school's policies.
- I will ensure gen AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using gen AI for any purpose.
- I will ensure there is lawful basis for uploading sensitive school-related information into gen AI systems, established as part of the DPIA process.

Responsibility and Accountability:

- I will use gen AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of gen AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all gen AI-related activities within and outside of school premises that are connected to my professional responsibilities.

Appendix 3 Gen AI Tools Request Form

Contact person:

Date of request:

Gen AI Tool/Resource Details

Name of AI tool/resource:

Purpose of use:

Expected benefits:

Potential risks:

The following points have been acknowledged: (please circle – YES / NO)

- **GDPR UK compliance:** Users of Gen AI must uphold their data protection responsibilities in accordance with the General Data Protection Regulation (GDPR UK).
- **Acceptable use agreement:** Users of Gen AI must ensure that its use is consistent with the school's Staff Acceptable Use Agreement and should understand their responsibilities for mitigating associated risks, as outlined here: <https://hwb.gov.wales/support-centre/education-digital-standards/generative-artificial-intelligence-in-education#considerations-for-schools-and-settings-around-generative-ai>


- **Gen AI use case:** Users must establish a clear purpose for deploying and using specific Gen AI tools through effective and ethical use.

Headteacher Approval: (please circle – YES / NO)

Approval date:

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Every effort has been made to ensure that the information included in this document is accurate, as at the date of publication in March 2025. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material.

 Action Plan: Safeguarding, Wellbeing and Data Protection in the Use of Generative AI						
Action	What will be done?	Who?	Timescale	Success Criteria	Monitoring & Evidence	Status / Notes
Appoint a Safeguarding Lead for Gen AI	Safeguarding lead/DPO will oversee generative AI use.	HT	Term 1	Named lead in post; roles clearly defined; staff aware	SLT minutes; safeguarding structure; staff briefings	
Staff training on AI, online safety and ethics	Deliver regular CPD on AI ethics, safeguarding and responsible use.	SLT / DSL/ DPO	Termly	All staff trained; increased confidence	CPD logs; staff evaluations	
Curriculum review	Audit curriculum to identify opportunities to address AI, ethics and online safety.	Curriculum Lead / AoLE Leaders	By end of year	Clear curriculum mapping	Curriculum audit; planning docs	
Clear reporting mechanisms	Establish procedures for safeguarding or data incidents linked to AI.	DSL / DPO	Term 1	Clear pathways; staff awareness	Policy updates; incident logs	
Parental engagement	Raise parent awareness of AI risks and best practice.	HT/DSL	Ongoing	Increased parental awareness	Workshops; letters; website	

Annual review of AI tools	Review AI tools and update risk matrix annually.	SLT / DSL / DPO	Annually	Updated risk matrix	Annual review report	
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Review

This policy will be reviewed annually and updated as required in response to significant changes in guidance, legislation or developments in generative AI.

Adopted by: Berriew C.P. School

Date: 5/2/2026

Next Review: 5/2/2027