Blaenavon Heritage Voluntary Controlled Primary School



Generative Artificial Intelligence in Schools policy

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BHVC Primary Online Safety Policy – Generative Artificial Intelligence (gen AI) in Schools

Context

Gen AI represents a transformative leap in technology, enabling machines to create text, images, audio, and video with remarkable accuracy and creativity. Emerging from advancements in machine learning, particularly deep learning, generative models such as GPT (Generative Pre-trained Transformer) and DALL·E leverage vast datasets to understand and produce content that mimics human expression. Initially text-focused, these models have evolved to become multi-modal, integrating and processing various types of input, such as text and images, to generate cohesive outputs.

BHVC Policy on the use of Gen AI in School

Statement of intent

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that integrating gen AI tools into education presents many opportunities, including the potential to enhance educational experiences and support staff with some administrative tasks. However, their use must prioritise safety, responsibility, ethics, trust, data protection and inclusivity.

We also realise that there are risks involved in the use of gen AI systems, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address risks.

We will educate staff and learners about safe and ethical use of gen AI, preparing them for a future in which AI technologies are likely to play an increasing role.

The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

Related policies

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- Curriculum Policies

Policy Statements

- The school acknowledges the potential benefits of the use of gen AI in an educational context - including enhancing learning and teaching, improving administrative

processes, managing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use gen AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.

- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Learners Safe
- We will provide relevant training for staff and governors in the potential advantages, use of and potential risks of gen AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about gen AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with gen AI tools.
- As set out in the staff acceptable use agreement, staff will be supported to engage with gen AI tools responsibly, ensuring the protection of both personal and sensitive data.
- Staff will always ensure gen AI tools used comply with UK GDPR and other data protection regulations, verifying with the Data Protection Officer (DPO) that tools comply with standards set by the Information Commissioner's Office (ICO) before using them for work related to the school.
- All staff will be required to carefully consider the use of any gen AI tool and involve senior leadership in decision-making around its use.
- Staff should always use school-provided accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Schools and practitioners will not input any personal data, learner data or other sensitive or confidential information into gen AI tools.
- The school will ensure that when gen AI is used, it will not infringe copyright or intellectual property conventions. Care will be taken to avoid intellectual property, including that of the learners, being used to train gen AI models without appropriate consent.
- Staff must report any incidents involving gen AI misuse, data breaches or inappropriate outputs immediately to the relevant internal teams.
- The school will keep a record of all tools in use, their purpose and potential risks. (Risk assessment matrices are attached as an appendix)
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When acquiring and implementing gen AI systems, we will follow due care and diligence to prioritise fairness and safety.
- The school will support parents and carers in their understanding of the use of gen AI in the school (this could be through an "AI in our school guide")
- Where staff use gen AI tools to support their learning and teaching practice, this will be purposeful, considered, with a clear focus on ensuring impact and understanding and mitigating risk.
- Staff will ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance.
- Staff will ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing.

- Improper use of gen AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.

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.

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

SRS 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 and that
- 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 and 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:

- sharing newsletters
- sharing information online e.g., website, social media
- 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 well promoted, easily understood and 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. This can be done via:

- nominated member of staff
- established school reporting mechanisms

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

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of gen AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being
- Duty of care

Education and training

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including gen AI.

This policy outlines our commitment to integrating gen AI effectively within our school environment. We will use gen AI responsibly, safely and purposefully to support with a variety of tasks such as:

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

AI literacy, which includes being able to think critically, engage with evidence and information, verify sources and use creativity, will be fundamental. The skills integral to the four purposes, which should be developed across all Areas of Learning and Experience in the Curriculum for Wales, are focused on building these dispositions. Our school's approach is to deliver this knowledge and understanding where it is appropriate and relevant in our curriculum.

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting's risk profile. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this by:

- Engaging with learners
- Critical evaluation of emerging trends and research findings
- Seeking advice from technical experts and our Data Protection Officer.
- Surveys
- Focus groups
- Parental engagement
- Staff consultation
- Staff training

As gen AI becomes an integral part of modern education, it is important that staff develop the knowledge and skills to integrate gen AI tools responsibly into teaching, learning, and administrative processes. By fostering AI literacy, staff can confidently prepare learners for a future where AI is a key driver of innovation and opportunity.

- We will support and ensure all staff can access training on the effective, responsible, lawful and ethical use of emerging technologies in education.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including 'Keeping Learners Safe'.
- We will support staff to identify, assess, and mitigate risks associated with gen AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will support staff to ensure compliance with UK GDPR and other relevant regulations while using gen AI systems.
- We will promote ethical practices in the use of gen AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower staff to teach learners about the safe and ethical use of gen AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.

The following resources are used:

- 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

Additional links

- SWGfL – Artificial Intelligence and Online Safety
- Understanding AI for school – Tips for School Leaders - ASCL, NAHT, CST, and others

BHVC Risk Assessment Matrix for Implementing gen AI

Introduction

Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	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.				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 safeguarding concerns and commercial risk.				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.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.				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.				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.				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				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.				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 wellbeing or inclusion. Gen AI models producing discriminatory or biased outcomes.				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).				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.				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				Provide equitable access to gen AI resources

	demographic groups.				and ensure alternative solutions are available.
AI Ethics Awareness	Lack of awareness among staff and learners about ethical implications of gen AI.				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.				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.				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.				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.

Action Plan

1. Deliver regular training for staff on online safety, AI ethics, and responsible use.
2. Review curriculum offer to identify where gen AI-related issues might be incorporated into learning in relevant and appropriate parts of the curriculum.
3. Establish transparent reporting mechanisms for reporting any safeguarding or wellbeing concerns linked to gen AI, as well as for any data protection incidents that involve personal data.
4. Collaborate with parents and carers to raise awareness about gen AI risks and best practices.
5. Conduct annual reviews of gen AI tools and their impact on learner wellbeing, updating the risk matrix as needed.

Review and Update

The school will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.