



## **Bromstone Primary School**

# Artificial Intelligence Policy

### **Key Details**

**Designated Safeguarding Lead (s): Emma Ribbans, Head of School**  
**Named Governor with lead responsibility: Di Springett, Safeguarding Governor**

**Date written/updated: September 2025**

**Date agreed and ratified by Governing Body : 1<sup>st</sup> October 2025**

**Date of next review: October 2025**

This policy will be reviewed **at least** annually. It will also be revised following any concerns and/or updates to national and local guidance or procedures.

Bromstone Primary School recognises that Artificial Intelligence (AI)-powered tools (voice-based or text-based) can provide personalised support and reduce staff workload. This policy outlines how AI systems may be used safely, ethically, and effectively, ensuring compliance with safeguarding, data protection, and educational best practices.

## **1. Purpose and Scope**

### **Purpose**

- Ensure AI tutoring aligns with curriculum standards and legal/ethical guidelines.
- Protect students from harm or exploitation in AI tutoring contexts.
- Comply with data protection laws (e.g., UK GDPR).
- Clarify lines of accountability so that qualified staff oversee AI tutoring systems.

### **Scope**

- Applies to all AI tools, platforms, or software used with Bromstone Primary School students.
- Covers all staff, volunteers, and external providers who develop, manage, or use AI tools on behalf of the school.

## **2. Roles and Responsibilities**

### **Governors**

- Approves and reviews this policy.
- Monitors safeguarding, data protection, and educational impact.

### **Heads of School & Assistant Headteacher TLA**

- Oversees implementation of AI tools.
- Ensures staff have time and training to comply with this policy.

### **Designated Safeguarding Leads (DSL)**

- Monitors safeguarding incidents involving AI.
- Advises on risk assessments for new AI features.
- Oversees flagged or concerning content as per the school's safeguarding procedures.

### **Data Protection Officer (DPO)**

- Ensures all AI tutor data processing aligns with UK GDPR.
- Oversees Data Protection Impact Assessments (DPIAs) and data sharing agreements.

### **Teachers and Support Staff**

- Use only approved AI solutions.
- Remain responsible for final teaching quality and pupil progress decisions.
- Report technical, data, or safeguarding concerns to the DSL or DPO

### **3. Approval Process**

#### **Platform Vetting**

All AI platforms, including free trials, must be reviewed by the Senior Leader TLA in coordination with the DSL and DPO before use. Any provider must demonstrate suitable data protection measures and robust safeguarding features.

#### **Contracts & Agreements**

Bromstone Primary School must enter into a written contract and appropriate annexures if necessary (i.e. Data Sharing Agreement or Data Processing Agreement if not covered within the contract), outlining:

- How data is stored, processed, and secured.
- Any relevant third-party data sharing.
- Breach notification obligations.

#### **Teacher Oversight**

##### **1. Curriculum Lesson Development**

- Lessons using AI tools should not be fully machine-generated.
- Bromstone Primary School requires the involvement of teaching staff in lesson creation and review. This applies to external providers and any teacher-created lessons aided by AI tools.

##### **2. Educational Outcomes**

- Where AI platforms set goals for pupils, it is the responsibility of the class teacher to ensure they align with curriculum objectives.
- AI recommendations do not override teacher professional judgment; staff remain accountable for pupils' academic progress and well-being.

### **4. Safeguarding**

#### **Flagging & Alerts**

- The AI system must have filters or detection features for harmful or explicit content, automatically flagging concerns.

#### **Disclosure Handling**

- If a pupil discloses potential abuse or harm within AI use, staff respond as they would to any in-person disclosure, escalating to the DSL immediately.

#### **Teacher Oversight**

- Staff cannot assume the AI will catch all risks; human vigilance remains vital for spotting bullying, grooming, or other unsafe behaviour.

## **4. Data Protection and Privacy**

### **Data Minimisation**

- AI platforms must collect only minimal personal data needed for effective support (e.g., first name, year group).
- No sensitive data (e.g. health info, EHCP details) may be uploaded into generative AI services unless explicitly anonymised.
- Any data collected for platform development or analysis (e.g. SEND flags) must be anonymised and used solely for internal improvement, not shared externally.
- The school keeps a record of data sharing agreements.

### **Security & Breach Reporting**

- Providers must not share pupil data with unauthorised third parties.
- If voice data is stored or biometric identifiers are used, the school must obtain consent from parents or carers unless an existing agreement permits the school to provide consent on their behalf.
- Providers must promptly report data breaches to Bromstone Primary School, enabling the school to follow ICO notification procedures if necessary.

## **5. Monitoring and Review**

### **Ongoing Monitoring**

- The SLT will regularly collect feedback from staff and pupils on any AI tool's educational efficacy, safeguarding reliability, and data compliance.

### **Annual Policy Review**

- The Governing Body reviews this policy annually or sooner if major AI or legal changes occur.