Artificial Intelligence (AI) Policy

2025/2026

In God's hands, we love, learn, grow and inspire

"What shall we say the kingdom of God is like, or what parable shall we use to describe it? It is like the mustard seed, which is the smallest of all seeds on the earth. Yet, when planted, it grows and becomes the largest of all garden plants, with such big branches that the birds can perch in its shade.

Mark 4: 30-32

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Reviewer	Jo Brace
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Use of Artificial Intelligence (AI) in HMFA

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1. Purpose

This policy provides guidance on the ethical and effective use of Artificial Intelligence (AI) within the HMFA. It is designed to align with the UK's commitment to fostering innovation while ensuring safety, inclusion, and accessibility in education. Users are expected to comply with the policy to ensure that AI tools are used appropriately. There are a number of other relevant policies which this policy links with, including the Data Protection Policy, Technical Security Policy, Online Safety Policy - Acceptable Use policy and Safeguarding & Child Protection Policy. This is supplementary to existing policies and should be read in conjunction with them.

2. Scope

This policy applies to all staff, pupils, parents, governors and other stakeholders in the HMFA community who may interact with AI technology in any capacity. It covers AI tools in the classroom, Online learning platforms, administrative purposes and any other school-related activities.

3. Definitions

AI – Artificial intelligence, including machine learning, natural language processing (NLP) and large language models (LLMs).

LLM – Large language models such as ChatGPT, Google Bard/ Claude which have Generative capabilities.

NLP – Natural language processing such as Alexa/Siri - differs from the above and has less opportunities for bias and hallucination.

Image generation from LLM - images can be created via texts prompts which can be inappropriate or subject to bias.

Watch this informative video about AI HERE.

4. Objectives

- to improve teaching and learning outcomes.
- To ensure ethical and legal use of AI.
- To protect the privacy and data of all stakeholders.
- To utilise AI to reduce the administrative and academic workload of staff.
- To remain at the forefront of education by integrating AI to enhance and supplement the HMFA's mission to best support our pupils.

5. Five Principles for the Use of AI in Education

The UK Government has adopted a cross-sector and outcome-based framework for regulating AI, underpinned by five core principles:

Regulatory principle	We will
Safety, security and robustness	• Ensure that AI solutions are secure and safe for users and protect users' data • Ensure we can identify and rectify bias or error • Anticipate threats such as hacking
Appropriate transparency and explainability	• Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	• Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate
Accountability and governance	• Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	• Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology • Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment

6. Responsibilities

The following individuals and groups are responsible for the implementation and maintenance of this policy:

Role	Responsibilities
IT Director	• Researching use of AI technologies and developing the policy and AI strategy.

	• Create reporting systems • Monitor and review the policy • Ensure that the development and use of AI tools complies with regulations and existing policies. • Monitor usage to ensure compliance.
School leadership teams	• Provide training and resources to support staff in effectively using AI. • Regularly review AI tools for compliance with privacy, security, and educational standards. • Engage with parents and guardians to explain the role of AI in supporting their child's education.
HMFA Trust board	• Ensure that the policy reflects the values and ethos of the school, is easy to understand and takes into account stakeholder feedback. • Monitor policy implementation, ensuring staff and pupils understand what is expected of them and how to stay safe. • Ensure risks associated with the implementation of this policy are documented (via the risk register) and controlled appropriately.
IT Support	• Manage the technical aspects of AI implementation, including data security and system maintenance. • Provide independent expert advice on AI systems. • Provide evidence and assurance that third party systems are safe, compliant and effective. • Alert the school/trust to any changes to their own policies that relate to use of AI.
Teachers	• Ensure AI tools are used in line with this policy. • Ensure all AI tools are aligned with curriculum goals and objectives. • Before using any AI tool, consult with the IT Director to ensure it's approved for educational use. Refer to the 'HMFA approved AI tools list' (See Appendix 1) • Clearly indicate where and when AI is being used. • Monitor the effectiveness of AI tools and provide feedback to school leadership. • Safeguard pupil data when using AI applications.
Admin staff	• Ensure AI tools are used in line with this policy. • Before using any AI tool, consult with the IT Director to ensure it's approved for educational use. • Clearly indicate where and when AI is being used.

	• Monitor the effectiveness of AI tools and provide feedback to school leadership. • Safeguard pupil data when using AI applications.

7. Ethical use of AI

The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Users should be mindful of the following considerations:

Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socioeconomic background. Users must ensure they follow the requirements of the Equality Act 2010.

Accuracy – information may be inaccurate when generated so any content should be fact-checked. Tools may provide highly plausible and coherent results but may still contain errors.

Human oversight- a lack of human intervention may result in AI outputs going unchecked. Humans should ensure that outputs align with societal values, and users should be aware that Generative AI lacks flexibility, human understanding, and compassion.

Currency – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

Environmental issues - use of AI requires energy to run. Therefore, it should only be used when relevant, appropriate and proportionate, where it is the most suitable and sustainable option.

Reputational - trust in our HMFA systems and relationships with stakeholders may be harmed if we do not demonstrate our commitment to ensuring they are not harmed by our use of AI.

8. Data Privacy & Security

When using AI tools and systems, staff should follow data protection guidelines and avoid inputting any personal or sensitive data.

When using AI tools users should be aware that any information entered into some AI models may no longer be private or secure. Users must not enter any information containing personal data, intellectual property or private information (including confidential information, such as contracts) into any AI model without checking whether it is permitted to do so. The AI tools that are safe to enter personal data into are listed in Appendix 1.

Users who wish to utilise new AI tools or new AI functionality within existing tools must follow the Data Protection Policy and Data Protection Impact Assessment Procedure. Users should be aware that it is not always easy to recognise when AI tools are processing personal data and they should not presume that no processing is taking place.

Use AI tools that are compliant with GDPR.

Staff and pupils should use HMFA email accounts if they have to sign up for any AI system accounts and where possible, opt out of any marketing communications.

HMFA monitoring and filtering systems will be used to restrict and/or track use of AI tools as appropriate, to ensure students are protected from potential online harm, in accordance with safeguarding guidance and the Online Safety Policy.

9. Accuracy and fact-Checking

Ensure that all AI-generated content is accurate and factually correct.

10. Safeguarding

Take a positive stance about AI – related safeguarding risks, including but not limited to:

- Deep fakes and impersonation
- Harassment and bullying
- Criminality, coercion, grooming and exploitation.

Note that AI could be an aggravating factor in safeguarding and child protection cases.

11. Guidance on the Use of AI

Using AI in the Classroom

1. **Enhancing Learning Opportunities** AI can be integrated into lessons to:
    a. Provide personalized learning experiences through adaptive platforms like math or literacy apps.
    b. Facilitate creative activities, such as story generation or art creation, to inspire and engage pupils.
    c. Offer real-time feedback on assignments, helping pupils improve their work immediately.
2. **Supporting Pupils with EAL**

    a. Use AI-powered translation tools to help EAL pupils access lesson materials in their first language while gradually building English proficiency.
    b. Employ language-learning apps to provide interactive vocabulary and grammar practice tailored to individual progress.
3. **Supporting Pupils with SEND**
    a. Deploy AI tools to support differentiated instruction, such as apps that read instructions aloud for pupils with reading difficulties.
    b. Utilize tools like predictive text or visual organizers to help pupils with processing or motor skill challenges complete tasks more independently.
4. **Interactive Historical Learning** AI tools can allow pupils to engage with history in innovative ways.

Using AI for Administrative Tasks

AI can streamline and improve administrative processes, allowing staff to focus more on teaching and pupil engagement. Examples include:

- **Management Information Systems (MIS):** Tools like Arbor MIS can automate attendance tracking, report generation, and parent communication, reducing manual workload.
- **Meeting Support:** AI-powered applications like CoPilot can assist in taking meeting minutes, summarizing discussions, and generating actionable insights.
- **Scheduling and Resource Allocation:** AI systems can optimize timetables, ensuring efficient use of school resources and minimizing scheduling conflicts.
- **Data Analysis:** AI can analyse pupil performance data to identify trends, enabling informed decision-making and targeted interventions.

Using AI for Creative Content Creation

AI tools like Canva can enhance creative activities in the classroom by enabling both teachers and pupils to:

- **Create Visual Resources:** Design engaging images, posters, and infographics to support learning materials.
- **Build Presentations:** Use AI-driven templates to quickly create visually appealing slideshows for lessons or pupil presentations.
- **Develop Timelines and Storyboards:** Generate clear, organized timelines or storyboards to support history lessons or creative storytelling projects.
- **Foster Pupil Creativity:** Encourage pupils to explore their creativity by designing their own projects with accessible, user-friendly AI tools.

12. Training Tools

All HMFA schools have a National College subscription. Relevant courses are:

AI for Lesson Planning

https://nationalcollege.com/webinars/ai-for-lesson-planning-digital-tools-primary

AI and SEND

https://nationalcollege.com/webinars/ai-and-complex-send-primary

Certificate in the fundamentals of AI for Education

https://nationalcollege.com/courses/certificate-in-the-fundamentals-of-ai-for-educators

The Latest AI Compliance Updates

https://nationalcollege.com/webinars/ofsteds-ai-compliance-updates

Evaluation and Review

This policy will be reviewed annually to reflect technological advancements, changes in legislation and any updates in educational guidelines. Feedback from staff, pupils, and parents will inform any revisions.

Credits

Mark Anderson, Laura Knight 2023 (CC BY-NC-SA 4.0)

Browne Jacobson

The Key

SchoolPro UK - DPO

SWGfL

Appendices

Appendix 1 – HMFA Approved AI Tools

Appendix 2 - Link to AI Tool Evaluation form

Appendix 3 - AI Decision Making Flowchart – Browne Jacobson

Appendix 1

HMFA Approved AI Tools (following advice from SchoolPro UK DPO)

Company	Function	Policies	Personal Data Collected	Additional	Processor Agreement in Place	DPIA
Copilot	AI powered assistant	Complies with all existing privacy, security and compliance commitments.	Does not use any personal data to train the AI model.	Operates with multiple protections which include blocking harmful content	No	Not required as it does not use, process, collect or store personal information. We currently have a light version. We would need to upgrade to enable full access £20 per month per user. We would need a readiness assessment conducted by MS License company (Trustmarque) and IT support to fine tune the Azure settings.
Robin Education	Compliance Checks and Audits across school's website	Privacy policy in place.	Information collected would be the school web addresses so to facilitate searching policy across the website and schools.	Uses cookies	No	Yes
Century Tech	English, Maths and Science adaptive learning platform	Privacy Policy in place.	Significant data is collected from all participating KS2 pupils and teachers. Includes names, DOB, email addresses, and education-related	HMFA do not provide SEN Status.	No	Yes. This was reviewed 24/06/25

			information (e.g., grades, SEN status). No sensitive data is processed unless explicit consent is obtained (e.g., SEN status)			
Scribe	Creates SOP's, manuals and tutorials.	Policy on website	No personal data is entered	Scribes core functionality does not use AI. A subset of features in scribe uses AI. Customers can opt out of using AI. Partner with 3rd party AI providers who adhere to same high standards as Scribe. Customer data is not retained, processed or used to train or develop 3rd party AI algorithims	No	Not required as does not use, collect, process or store personal information
Teachmate. AI	Report writer, curriculum report writer, management and classroom tools.	Policy on their website	No personal data is entered	Only uses personal data for account purposes	Yes	Not required if personal data is not entered into TeachmateAi tool. If using personal data a DPIA will be required.

ChatGPT	Answers questions, assisting with writing, providing recommend ations etc	Privacy policy available in OpenAI's official website	Does not process or store personal information unless it is directly shared during the conversation, and will not retain that information after conversation ends		No	Not required as personal information is not used, collected or stored
KeyGPT	Personalised response to specific questions.	Has an AI privacy statement	Personal information is collected only if entered by the individual using KeyGPT features. Does not use data inputted to train AI models. Data entered in to KeyGPT is transferred to US. Compliant with UK international data transfer requirements	It is not clear whether personal data collected is retained once the interaction has been completed. AI policy does mention not typing any sensitive information i.e. PII about a child, parent, carer or staff member		Clarify with school what purposes they will be using the functionality for and if personal data will be disclosed. If yes a DPI A may be needed as KeyGPT use US based hosts.
ArborMIS AI	Managemen t tool to help create pupil reports, find answers to questions, help in setting up policies. Admin staff – letter writing AI	No clear policy for data protection or use of AI. Does have a general privacy policy for main business of MIS system.	Personal data could potentially be collected if entered by the person using the AI functionality. If using the AI tool for report writing, it appears the pupils data could be drawn from MIS information. It is not clear if the data	Hosted in Amazon Web Services London data centre. Data is stored, processed and managed in the UK	No	If personal data is being used for report writing etc, recommend having a DPIA. DPIA - change of MIS Scholarpack to Arbor covers this. DPO confirms that there is no need to write a new DPIA. Reviewed 24/06/25

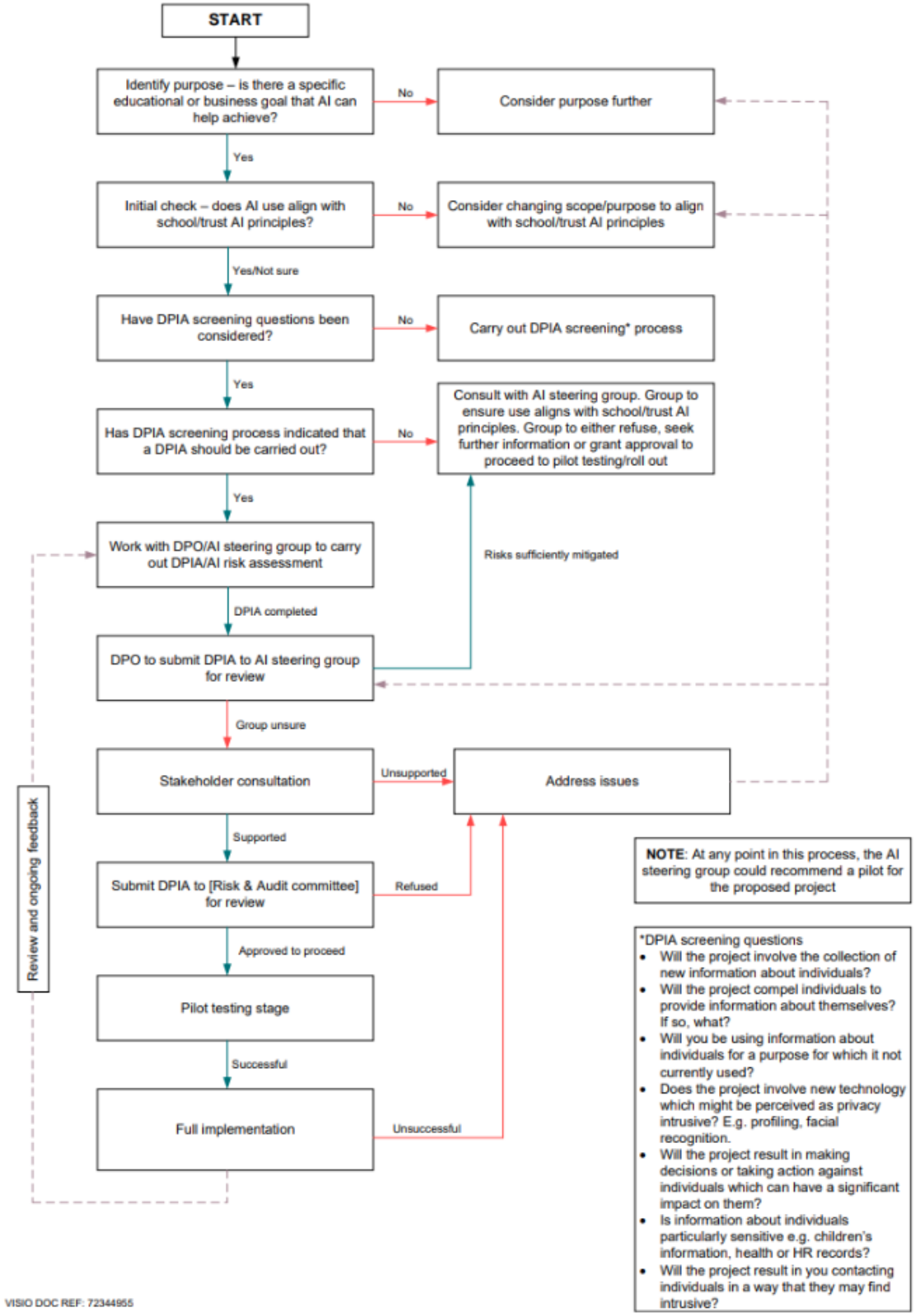
			collected during this function is stored on Arbor systems.			
Read.ai	Searches across emails, messages etc to formulate summaries, capture meeting content, find insights. Can be used for real time meetings.	Privacy Policy	Personal data is collected through searching across emails, video conferencing, messaging and minutes of meetings.	Customers can opt-in to contributing their data into their AI models for training purposes.	No	Due to the AI tool being able to harvest personal data from across a wide range of documentation and live video calling, it would be recommended to have a DPIA in place. HMFA have not trialled this yet. SchoolPro have not yet found a meeting minute tool that is GDPR secure.
Canva	Graphic design tool. Is used in education to provide lessons, worksheets and templates to teachers. Students use Canva to design and create content.	Privacy Policy , Acceptable Use Policy, AI product Terms	No personal data is collected when using the tools.		Yes	Not required as personal information is not used, collected or stored
Ai School Report Writer	Assist with report writing	Privacy Policy & Terms of use on their website	Only pupil first name is processed. Generated report is retained for 6 months and automatically deleted. Teacher should delete the reports from the system as soon as		no	Not required as first name is not stored beyond 6 months. It is a closed system and data is not being used to train the AI.

			they have been copied to a documents on school SharePoint network.			

Appendix 2

AI Tool evaluation form

This form is for HMFA staff to report any AI tools that you have evaluated. This will help to inform our AI Policy and how we develop the use of AI tools within the HMFA.

https://forms.office.com/Pages/ResponsePage.aspx?id=3eIc_UkmyUeAxtJpAoo5XctquDwJIXhOlUmVyaLq2TBUQjlCWlYxQ0c3QURITzRaTFNZNkU4RTNOWS4u

Appendix 3 - AI Decision Making Flowchart – Browne Jacobson