



POLICY ON THE USE OF ARTIFICIAL INTELLIGENCE FOR SHAKESPEARE PRIMARY SCHOOL

To be reviewed: Annually

Amended and Reviewed by Richard Howarth: October 2025

To go to: Finance and General Purposes Committee

Approved by Governors: October 2025

The Governing Body of Shakespeare Primary School adopted this policy on 2025. The policy will be reviewed on an annual basis.

CONTENTS

1. Purpose
2. Introduction and context
3. Use of GenAI
4. Governance
5. Copyright
6. Accuracy
7. Confidentiality
8. Social impact and equality
9. Ethical use
10. Risk
11. Legal compliance
12. Compliance
13. Review
14. Acknowledgement

1. Purpose

- The purpose of this policy document is to provide a framework for the use of Generative Artificial Intelligence and Large Language Model tools (collectively referred to in the rest of this document as "GenAI") such as OpenAI's ChatGPT, Google Gemini, Microsoft Copilot or other similar tools. This policy applies to all Shakespeare Primary users who capture, create, store, use, share, dispose or otherwise process information on behalf of the school.
- These persons shall be referred to as 'Users' throughout the rest of this policy.
- The school is referred to as 'we' throughout the rest of this policy.
- This policy is designed to ensure that the use of GenAI is ethical, complies with all applicable laws, regulations, and policies, and complements the existing information and security policies.
- The pace of development and application of GenAI is such that this policy will be in a constant state of development.
- Generative artificial intelligence can create realistic, human-like text, images, code, and art based on vast amounts of (usually public) data it has been trained on. GenAI can:
 - 1) produce a range of useful outputs, like text, audio, images, video, and code.
 - 2) respond to natural language questions, so any employee can use it.
 - 3) understand several types of data (which is useful given the large amounts of unstructured data in varying formats that are in use today).

2. Introduction and context

- GenAI is increasingly being used across industries, including the public sector, for its potential to bring substantial benefits to the way that services are delivered. We have also begun to use

this policy. If used safely and appropriately, GenAI could improve how we manage and use data and help us to communicate with and support children, parents and staff more efficiently. Understandably, the development and implementation of Gen AI technologies has recently received significant press attention, particularly where problems have materialised. As such, with the emergence of new GenAI technologies and the associated equalities and data protection risks, this policy is intended to help users understand the school's position on the use of Gen AI technologies within its services.

- All staff currently using or intending to use GenAI, must familiarise themselves with this policy and have a responsibility to maintain transparency in its use (see section 10, Disclosure). The policy outlines the requirements that employees must follow when using GenAI tools, including the evaluation of security risks when dealing with the protection of personal, confidential or sensitive data.
- Please note that this policy relates to all technologies being designed, developed such as Microsoft Copilot or OpenAI's ChatGPT.
- Central government's response to the use and regulation of AI is still evolving. In this context, the school intends to remain dynamic with policy provision in this area, whilst still providing clear guidelines to officers on how AI should be used. This policy will be adapted as necessary to address developments in the national landscape and to legislation or policy introduced by central government.
- This policy is intended to supplement existing policies. Staff utilising Gen AI are expected to follow existing policies regarding information, data protection, ICT Compliance and Risk, and Equality Impact Assessments.

3. Use of GenAI

- This policy applies to all staff members who work on behalf of Shakespeare Primary.
- This policy applies to all devices used in school and outside for school purposes.
- Users may use GenAI for work-related purposes if they adhere to this policy. This includes tasks such as generating text or content for lessons, emails, presentations, images, and parent / carer and child communications.
- Particular attention should be given to Governance, Copyright, Accuracy, Confidentiality, Disclosure, and Integration with existing tools.

4. Governance

- Users may choose to use a variety of GenAI systems but should do so knowing that Microsoft Copilot is the only officially licensed system for use by Lancashire County Council. When using other systems, users should take care to think about the risk involved.

5. Copyright

- Users must adhere to copyright laws when utilising GenAI. It is prohibited to use GenAI to generate content that infringes upon the intellectual property rights of others, including but not limited to copyrighted material. If a user is unsure whether a particular use of GenAI constitutes

copyright infringement, they should speak to the Senior Management team or the AI Champion before using GenAI. For example, using GenAI to produce a logo could produce something based on a copy of a logo that is a trademark or is copyrighted.

6. Accuracy

- GenAI can completely make up “facts” – “also known as hallucinations” -- as a large amount of data sources, some of which may be fiction, are used in creation of GenAI Large Language Models. It is important to check any content produced.
- All information generated by GenAI must be reviewed and or edited for accuracy prior to use. Users of GenAI are responsible for reviewing output and are accountable for ensuring the accuracy of GenAI generated output before use/release. If users have any doubt about the accuracy of information generated by GenAI, check, and correct the output.

7. Confidentiality

- Users should take care when using any Gen AI systems. Especially those other than Copilot as there has not been an agreement with any company other than Microsoft that data entered will not be reused.
- Users must not use GenAI apps on personal phones to record and summarise work meetings, or to use translation services.
- Using an external or free GenAI tool downloaded to a personal phone and inputting sensitive data is not authorised and could constitute a data breach.
- Confidential or personal data should only be entered into GenAI tools that have been approved or procured specifically (for example Copilot) and where the data entered is confined for the school’s sole use and use of that tool has been specifically sanctioned for that purpose.

8. Social impact and equality

Users must be aware of how the use of GenAI may impact different groups of people in different ways. For example, GenAI must not be allowed to solely determine which pupils should have access to lesson content; Humans must be involved in such decision-making.

9. Ethical use

Data ethics is about managing data responsibly and ethically, especially personal data, and sensitive information. As our world becomes more digital, data ethics ensures that data handling practices benefit society without compromising ethical standards.

Core principles of data ethics

- Privacy: Ensuring individuals can control the use of their personal information.
- Security: Protecting data from unauthorised access and data breaches.
- Fairness: Using data in a non-discriminatory way.
- Transparency: Making data processes clear and understandable.

- **Accountability:** Holding organisations responsible for their data practices.

Challenges in Data Ethics

- **Balancing Innovation with Privacy:** Leveraging data to reduce waste and inefficiencies while respecting privacy laws.
- **Bias and Discrimination:** Preventing biases in data and algorithms.
- **Data Ownership and Control:** Determining who owns and controls data.
- **Regulatory Compliance:** Navigating complex data protection laws

Examples of unethical data usage:

1. **Use of AI for personal comments given to parents.** It is unethical to enter personal information about children into AI to generate report summaries or personal comments.
2. **Targeted Campaigns:** Using sensitive school data to target specific lists of pupils – such as those with low attendance or various levels of attainment.
3. **Data Breaches:** Failing to protect user data, leading to unauthorised access and misuse of personal information.
4. **Surveillance:** Collecting and monitoring data on individuals without their knowledge or consent.

- Users must not use GenAI to generate content that is discriminatory, offensive, or inappropriate.

If there are any doubts about the appropriateness of using GenAI in a particular situation, users should consult with the Senior Management team or the AI Champion.

10. Risk

- Use of GenAI carries inherent risks users should consider the risks carefully before using AI technology.

How can I tell if my technology / piece of work is using AI?

- For some technologies, it is fairly obvious that they operate using AI. However, this is not always the case. If you are unsure if a technology you are using or plan to use would be considered as AI, it may be helpful to consider the following:

- Does it support decision-making or make decisions?
- Does it autonomously identify patterns in large volumes of data?
- Does it use Machine Learning, for example, learning to answer questions or solve problems?
- Does it predict or manage risks?
- Does it contribute to the allocation of resources or prioritisation of actions/investigations/inspections?
- Does it remotely monitor the well-being of individuals?

- Does it predict health problems at an early stage?
- Does it translate language?
- Does it analyse and/or act on data from its environment?
- Does it perceive and react to the world, for example, recognising visual information (e.g., objects, individuals) or speech?
- Does it store past data and predictions to inform future predictions?
- Does it remember, adapt, or encourage changes to behaviour patterns?

If the answer to one or more of the above is yes, then it is likely that the technology is using AI to operate and you will therefore need to follow the procedures and considerations set out within this policy. If you are still unsure seek advice from Senior Management or the AI Champion.

- GenAI may store sensitive data and information, which could be at risk of being breached or hacked. The school must assess technical protections and security certification of a GenAI tool before use. If users have any doubt about the security of information input into GenAI, they should not use GenAI. The school's default position is to always check with Senior Management or the AI Champion.

11 Legal compliance

Data protection and confidentiality

Shakespeare Primary is bound by the provisions of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which sits alongside and supplements the UK GDPR. The school must be able to demonstrate its compliance with the provisions of the UK GDPR and the Data Protection Act 2018 and, in doing so, have regard to the relevant Information Commissioner's Office guidance in respect of its processing of personal data.

Generally, confidential information should only be fed into approved Gen AI tools, particularly if school lacks direct control and oversight over the use of the tool. Release of non-public information onto Gen AI tools is likely to be in breach of the above legislative requirements and may also breach school's contractual obligations.

Intellectual property

A key concern when using Gen AI tools is determining the ownership of both the input and output data.

In addition to data over which school has control and rights, data scraping (the process of extracting data from various sources, such as databases, files, or websites) is often performed in the training of generative AI tools. While this technique is not exclusive to AI or Gen AI, its use in training Gen AI tools can lead to intellectual property challenges.

There is also potential for copyright infringement if data that is fed into a Gen AI tool contains copyrighted material. Users must ensure that their use of GenAI complies with all applicable laws and regulations relating to the protection of intellectual property and with LCC policies.

When procuring Gen AI tools, the supplier's agreements may contain provisions allowing the AI vendor to reuse input data to refine their system. Some agreements may permit the AI provider

and vendor to retain ownership of the output data. It is imperative that such clauses do not conflict with school's requirements concerning the ownership and control of school intellectual property. Advice should be sought from Senior Management or the AI Champion if needed.

Ethical considerations

School users should also consider, in choosing Gen AI tools, the values that were considered in the design, development and deployment process. Specifically, they should have regard to such matters as:

- what datasets were used?
- how such datasets were acquired and fed into their systems for training
- who is tasked with data labelling and training the Gen AI system.

12. Compliance

- Any violations of this policy should be reported to the school's Senior Management Team or the AI Champion. Failure to comply with this policy may result in disciplinary action.

13. Review

- This policy will be reviewed periodically and updated as necessary to ensure continued compliance with all applicable legislation, regulations, and organisational policies.

14. Acknowledgement

- By using GenAI, staff acknowledge that they have read and understood these guidelines, including the risks associated with the use of GenAI