Vernham Dean Gillum's Church of England Primary School
Artificial Intelligence (AI) Policy and Code of Practice

1. Vision and Policy Statement

At Vernham Dean Gillum's Primary School, we acknowledge that Generative Artificial Intelligence (Gen AI) is fundamentally reshaping the educational, professional, and digital landscape. Guided by our commitment to delivering a future-ready education, this policy establishes a framework of **innovation with integrity**.

We approach AI through a balanced principle of strategic adoption, community engagement, and curriculum innovation, while embedding the highest standards of technical safeguarding and human accountability.

Our engagement with AI is split across three distinct dimensions outlined by the Department for Education (DfE) and the South West Grid for Learning (SWGfL):

1. **Teacher Support:** Reducing administrative and planning burdens to protect staff well-being and focus on high-impact teaching.
2. **Learner Support:** Building critical digital literacy to prepare pupils for an AI-integrated world.
3. **School Operations:** Driving efficiency across administration, leadership, and governance within the Federation.

2. Regulatory Framework & Policy Alignment

This policy does not operate in isolation. It forms a core component of the Vernham Dean Gillum's statutory frameworks and complies with the following national standards:

- **DfE Guidance:** *Generative Artificial Intelligence (AI) in Education* * **Keeping Children Safe in Education (KCSIE):** Meeting strict filtering, monitoring, and digital risk requirements.
- Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK
- **UK GDPR and Data Protection Act 2018:** Under oversight from the Information Commissioner's Office (ICO).
- **Joint Council for Qualifications (JCQ):** Adapting national AI malpractice and academic integrity principles to a primary setting.
- **Federation Policies:** Cross-referenced with the *Staff Code of Conduct*, *Staff/Pupil Acceptable Use Agreements (AUP)*, *Data Protection Policy*, and *Child Protection & Safeguarding Policy*.

3. Approved Technical Infrastructure: The Google Workspace Ecosystem

To protect corporate and educational data, Vernham Dean Gillum's Primary School operates a closed-loop AI ecosystem. **Staff and Governors are strictly prohibited from using personal, consumer-grade AI accounts for school business.**

Approved Tool	Authorised Group	Operational Guardrails & Constraints
Google Gemini *(Managed Education Account)*	Staff and Governors only	Primary tool for resource creation, differentiation, administrative drafting, and prompt engineering. Controlled via the school domain.
NotebookLM	SLT, SENCOs, and Governors	Used for the analysis of anonymised internal datasets, long-form policy reviews, and synthesis of national guidance.

Google Workspace Core AI *(Smart Compose/Docs AI)*	All Staff	Standard integrated text assistance, managed entirely within the Federation's secure data domain.

Note on Pupil Access: In adherence to software terms of service and age restrictions, **pupils will not be given individual accounts or direct, independent access to Gemini or other text-generative LLMs.** Pupil interaction with Gen AI must be entirely teacher-led, demonstrated, and heavily supervised.

4. Roles and Responsibilities

4.1 Governing Body

- **Strategic Oversight:** Maintain an active understanding of how AI is being adopted across the Federation to drive financial and operational efficiency.
- **Ofsted Inspection Readiness:** Ensure the school maintains a live **AI System Inventory and Risk Assessment Log** detailing what tools are in use, their purpose, and their mitigation strategies, available for regulatory inspection. **Template** for adapting: primary school ai inventory and risk log
- **Governance Innovation:** Use approved tools like NotebookLM to analyse lengthy local authority documents, DfE updates, or federation policies to prepare effectively for committee meetings.

4.2 School Leadership & Designated Safeguarding Leads (DSLs)

- **Risk Vetting (DPIAs):** The SLT and Data Protection Officer (DPO) must conduct a formal **Data Protection Impact Assessment (DPIA)** before introducing any new AI tools, browser extensions, or plug-ins.
- **Monitoring Safeguards:** Work with IT providers to ensure the Federation's web filtering systems prevent unauthorised commercial AI use while permitting vetted educational platforms.
- **Tracking Misuse:** Ensure protocols are in place to record, manage, and report any incidents of AI misuse, data breaches, or algorithmic bias.

4.3 Teaching and Administrative Staff

- **The Principle of Ultimate Human Oversight:** AI is an assistant, not a replacement for professional judgment. Staff are strictly accountable for the accuracy, age-appropriateness, and safety of any content, lesson plan, or email influenced by Gemini.
- **Fact-Checking & "Hallucinations":** Staff must critically evaluate all AI outputs. Content must be fact-checked and verified to eliminate algorithmic bias, errors, or inaccuracies before it is used in front of pupils or distributed to parents.
- **Data Anonymisation:** Staff **must never** input Personally Identifiable Information (PII), special category data, or confidential details regarding staff, parents, or pupils into Gemini.
- **Transparency & Labelling:** Documents, presentations, or formal parent communications heavily drafted or influenced by AI must contain a clear, transparent label (e.g., *"Drafted with the technical assistance of Google Gemini"*).

4.4 Pupils

- **Critical Evaluation:** Pupils will be taught that AI outputs are not guaranteed facts and must be checked using reliable traditional or digital sources.
- **Academic Honesty:** Pupils must understand that copying content or submitting work generated by an AI tool as their own violates the school's core values and constitutes academic malpractice.

5. Safeguarding, Cyber-Security, and Risk Mitigation

5.1 Content Guardrails and AI-Enabled Harms

In alignment with advanced KCSIE directives, the Federation recognises that AI introduces unique digital safety hazards.

Commented [1]: You will have to show me this? Not aware of what this is?

Commented [2]: me too please

Commented [3]: I've made a template

Commented [4]: Is this NB?

Commented [5]: CU and KE

- **Image-Based Abuse & Deepfakes:** The school explicitly categorises AI-generated intimate imagery or manipulated media ("deepfakes") 'including nudes, semi-nudes and deepfakes' as a serious safeguarding harm. The DSL team will treat any child on child incident involving AI manipulation with immediate, formal safeguarding interventions.
- **Misinformation & Radicalisation:** Staff will stay vigilant against the risk of pupils interacting with or absorbing biased, discriminatory, or radicalising materials generated by unmoderated online AI platforms.

5.2 Protection of Intellectual Property (IP)

- Under national IP conventions, pupils retain the intellectual property rights to their original schoolwork, stories, and artwork. Staff are strictly prohibited from uploading pupil work into open commercial AI models where it could be used for system training without explicit parental consent.

5.3 Cyber-Security and Secure Configurations

- In accordance with NCSC guidelines, staff must not download external AI plug-ins, browser extensions, or unauthorised mobile apps on school devices. These tools bypass corporate filters, create entry pathways for malware, and violate institutional security protocols.

6. Practical Use Cases & Operational Boundaries

To actively foster an environment of safe innovation, the Federation encourages Gemini and Notebook use within the following parameters:

Approved Administrative & Teaching Examples:

- **Lesson Differentiation:** Using Gemini to rewrite a dense historical text about Vernham Dean's history to accommodate a lower reading age or generate a targeted vocabulary crib sheet for English as an Additional Language (EAL) pupils.
- **SEND Structural Support:** Using Gemini to draft baseline templates for individual support profiles, text-to-speech scaffolds, or structural visual schedule ideas. *Reminder: No personal data or specific pupil names may be inputted during this process.*
- **Translation Support:** Creating bilingual parent notification templates or vocabulary matching grids for newly arrived EAL families, utilising a second engine to reverse-translate and verify accuracy.
- **Logistical Operations:** Utilising Gemini to draft initial trip safety risk assessment structures, write parental permission letter templates, or analyse anonymised parent survey trends.

Teachers and school staff should ensure that any AI generated content is carefully reviewed and fact checked.

Approved Teacher-Led Classroom Examples:

- **The "Gemini Fact Hunt" (Key Stage 2):** A teacher projects an AI-generated summary of a science topic containing intentional inaccuracies or "hallucinations." Pupils use non-fiction books and pre-vetted websites to identify errors, sharpening their critical source evaluation.
- **Creative Writing Prompts:** Utilising Gemini during a whole-class shared writing session to rapidly generate vocabulary banks, varied descriptive sentence starters, or creative plot twists based on pupil suggestions.

7. Home Learning & Unsupervised AI Use

The Federation recognises that pupils have access to consumer AI tools at home.

- **Homework Authenticity:** Home learning tasks set by both schools are carefully structured to reflect and assess independent pupil retention.
- **Parental Guidance:** The Federation will actively support parents and carers by publishing an *"AI in our School"* guide. This resource will detail the risks of over-reliance on generative platforms at home, helping parents ensure that homework remains an authentic reflection of their child's independent capabilities.

Commented [6]: Have we got this?

Commented [7]: Not yet...

8. Professional Development (CPD)

Vernham Dean Gillum's Primary School is committed to systematically building the digital capabilities of its workforce. Staff development will focus on:

- **Prompt Engineering:** Equipping teachers with the skills to construct highly effective, safe prompts within Google Workspace to maximise administrative time saved.
- **Ethical Assessment:** Training staff to recognise algorithmic bias, cultural insensitivities, and inaccuracies in automated software outputs.
- **DPO/DSL Briefings:** Regular updates for safeguarding and data leads on the changing nature of AI technologies, deepfakes, and emerging cyber-security vectors.

9. Policy Enforcement and Breaches

Adherence to this policy is mandatory for all individuals.

- Any deliberate or negligent insertion of personal data into unapproved AI engines, failure to maintain human oversight resulting in administrative failures, or deliberate circumvention of secure IT filters will be investigated.
- Improper or unauthorised use of AI systems that compromises data privacy, child safety, or professional standards will be subject to formal review under the **Staff Disciplinary Policy**.

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10. Policy Review

This policy will be reviewed annually by the Executive Headteacher, the DSL team, and the Governing Body to maintain rigorous alignment with rapidly shifting technological capabilities, updated statutory DfE expectations, and upcoming versions of Keeping Children Safe in Education.

Date of Policy Adoption: 24th September 2026

Date for Next Scheduled Review: 24th September 2027