Phoenix Arch School

Kind, Curious, Creative and Collaborative

Artificial Intelligence Policy

2026–27

School	Phoenix Arch School
Policy owner	Headteacher / Designated Safeguarding Lead
DSL	Falu Mehta
Deputy DSLs	Lennie Sarkis and Luana Oancea
Approval	Governing Body – October 2026
Review date	October 2027, or sooner if statutory guidance changes

1 Purpose and scope

Phoenix Arch is a specialist primary school for autistic pupils with Education, Health and Care Plans (EHCPs). We will use artificial intelligence (AI) where it improves access to learning, supports staff practice or reduces unnecessary workload. Our priority is meaningful progress, communication, independence and wellbeing within the Orchard, Hedgerows and Woodlands pathways.

This policy applies to permanent, supply and agency staff, leaders, governors, volunteers, contractors and visiting professionals when carrying out school work. It also governs any school-authorised pupil use. It covers standalone tools and AI features within existing platforms, whether used on site or remotely. School device and account rules continue to apply.

What AI means

AI refers to software that performs tasks such as recognising speech, identifying patterns or suggesting responses. Generative AI creates content, including text, images, audio and video. An AI feature within a familiar school system still requires assessment. A product described as ‘closed’, ‘education’ or ‘enterprise’ is not automatically approved or suitable for personal data.

Our principles

- Keep people accountable: the responsible member of staff checks, adapts and approves all outputs before use. AI does not make school decisions.

- Protect relationships: technology must support purposeful adult–pupil interaction, trusted adults and professional collaboration.
- Use AI fairly: maintain ambition, reduce barriers and challenge stereotypes or assumptions about autism and disability.
- Protect information: use only authorised tools for their recorded purposes and apply the controls in section 5.

Our values guide this approach: Kind means protecting dignity; Curious means questioning outputs; Creative means developing accessible learning; Collaborative means involving colleagues, therapists, pupils and families appropriately.

2 Staff use in teaching and schoolwork

Staff may use an approved tool within its recorded conditions for the following purposes. Use generic or genuinely anonymised information unless the separate personal-data authorisation in section 5 has been completed.

- Suggest lesson ideas, worked examples, vocabulary, sentence starters and practice activities linked to agreed learning objectives.
- Adapt a generic text into clearer language, an accessible layout or an alternative format, while retaining the intended meaning and curriculum ambition.
- Prepare draft agendas, newsletters, presentations and general correspondence from information permitted by the tool's approval.
- Summarise public guidance or other material the school is entitled to use; check the original source and publication date.
- Explore administrative improvements where the benefit, cost and information risks have been assessed.

SEND and curriculum expectations

- Teachers must start with what pupils already know, understand and can do, and use verified assessment, relevant EHCP provision and NEN targets to make their own planning decisions. AI must not set an artificial ceiling on achievement.
- Within Orchard, use adaptations that preserve intended curriculum knowledge. Within Hedgerows, align scaffolding and sequencing with the adapted curriculum. Within Woodlands, prioritise meaningful engagement, communication and real experiences.
- Check that activities match learning objectives and that the vocabulary, modelling, challenge and sensory demands are appropriate. Evaluate learning rather than the attraction of an on-screen character.
- Use established communication approaches consistently. Check suggested symbols against authorised Widgit resources; verify Makaton signs through trained staff or authorised materials. AI must not invent signs or alter a pupil's agreed communication system.
- Consult the SENCO and relevant therapist about materials supporting SALT or OT programmes. AI suggestions do not constitute diagnosis, therapy advice or permission to change prescribed provision.
- Maintain practical learning, play, movement and interaction. Avoid replacing teaching with generated worksheets or extended screen use.

Assessment and professional records

AI may help format an authorised draft or generate generic practice materials. Teachers must verify feedback and assessment against observed learning. Records must distinguish independent work from adult support, assistive technology and AI-generated content. Never invent observations, progress, assessment results, meetings, signatures or EHCP evidence. AI detection scores must not be treated as proof of misconduct; consider the pupil's communication and support needs.

3 Pupil use and digital literacy

Direct pupil use is permitted only where the Headteacher has approved the specific tool, activity, age group and supervision arrangements following the checks in section 7. A staff-facing approval does not permit pupil access. Pupils must not access unrestricted general-purpose chatbots independently in school.

- Follow the provider's age and account requirements. Do not create accounts using false ages or allow pupils to use a staff account intended for adults. Parental agreement does not override supplier restrictions.
- Use designated pupil Chromebooks or other specifically authorised pupil or assistive devices. Staff-issued laptops, phones, personal devices and personal accounts must not be handed to pupils.
- Plan a clear learning purpose, short sessions, adult supervision, accessible instructions and a predictable way to finish. Preview generated content before displaying it; where live interaction is authorised, an adult must oversee each exchange.
- Assess each pupil's communication, processing, sensory and regulation needs individually. Offer an equivalent accessible activity where the tool is unsuitable; do not disadvantage a pupil for needing an alternative.
- Teach through appropriate visuals, modelling and repeated practice that AI can make mistakes, generated content is not necessarily real, personal information must not be shared, and help comes from a trusted adult.
- Record how AI contributed to pupil work where this matters for assessment, using an explanation the pupil can understand. Do not require a pupil to write an attribution beyond their communication abilities.

Relationships and emotional safety

Do not use AI companions, counselling bots or chatbots as substitutes for ELSA, therapy, pastoral support or trusted adults. Explain, at the pupil's level, that the system is software and does not have feelings or know them as a person. Any character-based roleplay must have a clear educational purpose, be time-limited and be framed so pupils can distinguish the activity from a real relationship.

Watch for distress, fixation, repeated requests, difficulty ending sessions, reduced interaction with people or personal disclosures. Stop or adapt an activity when needed, support regulation and share concerns through safeguarding procedures. Do not infer abuse or mental illness solely from an AI output or automated flag.

4 Uses the school does not permit

- AI deciding safeguarding referrals, suspensions, admissions, EHCP provision, diagnoses, medication, therapy or staff employment outcomes. Responsible professionals must make these decisions using evidence and the applicable procedures.
- Impersonation, deceptive messages, bullying, discriminatory material, sexualised content, deepfakes or cloning a pupil's or colleague's image or voice.
- Bypassing filters, supplier age limits or school access controls; installing unauthorised applications or browser extensions.
- Presenting generated work as a pupil's independent achievement or an AI-generated statement as a factual witness account.

5 Personal information and confidentiality

The default is to keep personal and confidential school information out of generative AI. Staff must not enter it into public tools or personal accounts. This includes prompts, files, screenshots, photographs, recordings, voice input and information automatically accessed through integrations.

- Protected information includes pupil and family details, EHCPs, SEND or medical information, safeguarding and CPOMS records, behaviour incidents, staff HR information, passwords and confidential governor papers.
- Removing names is not enough. Initials, class names, dates, rare needs or incident descriptions may identify someone in a small school. Pseudonymised information is still personal data. Use generic examples that cannot be linked to an individual.
- A paid subscription, a supplier's claim of compliance or switching off chat history does not by itself authorise personal-data processing. Approval must cover the exact product, account, features, settings and purpose.

Exceptional processing of personal data

Where processing is necessary for an identified school purpose, it must be authorised in writing by the Headteacher following DPO advice and technical and safeguarding checks. Approval of the tool alone is insufficient. This policy does not authorise uploading safeguarding case files or confidential HR case material into generative tools; any proposed specialist use needs a separate documented assessment and explicit authorisation before access.

- Identify the purpose, minimum information required, lawful basis and any applicable special-category condition. Do not assume parental consent is always the appropriate lawful basis.
- Complete and approve a Data Protection Impact Assessment before processing where legally required. As a school control, undertake a documented DPIA for any new AI use involving pupil personal data.
- Check supplier and school responsibilities, sub-processors, model-training use, retention, deletion, access controls, international transfers and contractual safeguards. Unrelated model training or commercial reuse of school personal data must not be permitted.
- Update privacy information and communicate clearly with affected pupils, families or staff. Obtain consent or other permission where required for the particular activity; a general photograph permission does not authorise AI image processing.
- Store outputs only on approved school systems. Limit access and retain records for the appropriate school retention period. Do not accumulate full prompts or transcripts without a justified need.

6 Copyright and cyber security

- Check rights and licence terms before uploading textbooks, schemes, symbols, images, pupil work or other protected material. AI access does not remove copyright restrictions. Do not authorise model training on pupil work without appropriate rights and permissions.
- Use authorised school accounts and devices, strong passwords and multi-factor authentication where required. Disable unapproved integrations, transcription, shared links and automatic access to files.
- AI meeting recording or transcription requires prior approval, a defined purpose, appropriate privacy information and retention arrangements. Do not activate it informally in parent, therapy, safeguarding or HR meetings.
- Verify unusual payment, account-change or information requests through a known contact route. Synthetic voices and plausible emails may be fraudulent.

7 Responsibilities and approval

Who does what

- Governing Board: approve and review the policy, scrutinise risks and benefits, and receive proportionate assurance about implementation.
- Headteacher: lead implementation, authorise tools and purposes, ensure staff guidance and approve any suspension of access.
- DSL and DDSLs: assess online-safety risks, advise on pupil-facing use and respond to safeguarding concerns. The DSL is Falu Mehta; DDSLs are Leonard Sarkis and Luana Oancea.
- SENCO and curriculum leaders: assess accessibility, pathway suitability, communication demands and impact on learning, consulting therapists where relevant.
- School Business Manager: coordinate procurement, contracts, the approved-tools register and incident escalation to the school's DPO and IT provider.
- DPO: advise on lawful processing, DPIAs, transparency and breaches. IT support: assess security, configure access and support filtering, monitoring and technical incident response.
- All users: complete relevant training, follow approval conditions, check outputs and report concerns promptly.

Requesting and approving a tool

Before using a new tool or enabling a new AI feature, staff must submit the request information in Appendix B to the Headteacher or School Business Manager. The school must evaluate:

- The learning or operational purpose, evidence of likely benefit and how success will be measured.
- Age suitability, accessibility, sensory and communication needs, emotional dependence, bias and the impact on independence.
- Filtering, monitoring, moderation, user permissions and supplier arrangements for reporting harmful outputs. A web filter alone may not control generated responses.
- DPO advice, data flows, copyright, security, contracts and any required DPIA; use DfE AI product safety standards to question suppliers.
- Costs, support, staff time, value for money and proportionate environmental considerations.

Record the decision as approved, approved with conditions, a limited pilot, not approved or suspended. A pilot needs its own scope, safeguards, review date and stop criteria. Record permitted users, purposes and data in Appendix A before access is granted. Approval in another school or trust does not constitute Phoenix Arch approval.

Review approved tools at least termly and when suppliers change features, models, terms, data processing or age limits. Disable new AI functions pending assessment where existing approval does not cover them. Suspend use if safety or information protection cannot be assured.

8 Transparency and staff development

- Explain material AI use to families in accessible language, including any pupil-facing activities and authorised use of their information. Provide a contact route through the school office to the Headteacher, SENCO or DPO as appropriate.
- Keep a proportionate record of material AI contributions to policies, reports, assessment or external communications where needed for accountability. Staff remain the named authors responsible for final content. Do not imply specialist endorsement that has not been obtained.
- Provide induction and refresher training on approved tools, prompt privacy, checking sources, SEND adaptations, copyright, cyber security and incident reporting. Supply staff must receive relevant guidance before using tools.
- Share effective practice and evaluate whether AI actually saves time after checking and editing. Training attendance and any required use must respect contractual arrangements and reasonable adjustments.

9 Concerns incidents and misuse

If AI use causes concern, stop the activity or access where safe, support the pupil and report promptly. Do not wait for a debrief or try to resolve a safeguarding matter through the chatbot.

- Pupil safeguarding: report immediately to the DSL/DDSL and record relevant facts on CPOMS. Concerns about adult conduct go directly to the Headteacher; concerns about the Headteacher go to the Chair of Governors.
- Personal-data exposure: inform the School Business Manager and Headteacher immediately so the DPO can assess containment, notification duties and support. Preserve necessary evidence securely without circulating confidential screenshots.
- Technical compromise or harmful outputs: notify IT support through the school's reporting route and involve the DSL where pupil safety is affected. Do not investigate or share illegal content yourself.
- Inform the relevant lead which tool, account and feature were used, when the issue occurred, what information or people may be affected and any action already taken. Follow the applicable school incident procedure.

The DPO will advise on whether a breach must be notified to the ICO without undue delay and, where feasible, within 72 hours of awareness where the legal reporting threshold is met, and whether affected people must be informed. Staff must report immediately so those deadlines can be assessed.

Pupil responses must consider developmental understanding, SEND, communication needs and the support provided. Staff concerns will be investigated fairly under the school's adopted conduct and disciplinary procedures, including the opportunity to respond, accompaniment where applicable and appeal. Safeguarding action is not dependent on completing an employment investigation.

10 Review and related policies

The Headteacher will report proportionately to the Governing Board on authorised use, accessibility, impact on pupil learning and staff workload, incidents and actions. Review this policy annually or sooner following a significant incident, supplier change or revised guidance. Communicate amendments and update training.

Read alongside the school's Safeguarding and Child Protection, Online Safety, Acceptable Use, Data Protection, data-breach and retention procedures, Staff Code of Conduct, Behaviour and Regulation, assessment, SEND, copyright and procurement arrangements. Applicable law includes UK GDPR and the Data Protection Act 2018 as amended, equality duties and copyright law. Use current DfE and ICO guidance when reviewing the policy.

Appendix A Approved AI tools register

Template for completion by the school. This draft does not approve any named product. Before implementation, verify any existing authorisations and record them here; until approval is recorded, staff must not assume a tool or AI feature is permitted.

Generative Text Creators	Teaching Specific Tools	Image Generators
Microsoft Copilot: https://copilot.microsoft.com/	Oak AI Experiments: https://labs.thenational.academy/	Pixlr: Image Generator: https://pixlr.com/imagegenerator/
ChatGPT: https://chatgpt.com/	Chalkie https://chalkie.ai/en-gb	Canva Magic Studio. https://www.canva.com/magic-design/
Google Gemini: https://gemini.google.com/		
Claude: https://claude.ai/		

Appendix B Tool request and staff check

Submit the tool name, supplier and account type; intended activity and users; pupil ages and needs where relevant; information processed; likely benefits; costs; known risks; proposed safeguards; and pilot or review arrangements. Include any integrations, recording functions and model-training settings.

Before each use, check:

- Is this exact tool, account, feature and purpose authorised for these users?
- Can I do the task using generic information, and do all inputs comply with the data conditions?
- Will the activity support the pupil’s objective, communication and independence?
- Have I checked the output, sources, rights and suitability before use?
- Can I explain the use and do I know how to stop and report a concern?

If any answer is no or uncertain, resolve it with the appropriate school lead before proceeding.

Source documents and guidance

Prepared by combining the practical governance approach in the two supplied school policies with Phoenix Arch-specific expectations. Approval lists, trust structures and repeated charter text have not been transferred. The following sources should be checked at each review.

DfE — Generative artificial intelligence in education, August 2025

DfE — Generative AI product safety standards, January 2026

DfE — Keeping children safe in education 2026

DfE — Data protection in schools and EdTech procurement

ICO — Guidance on AI and data protection; check updates following the Data Use and Access Act