



Newhaven School Artificial Intelligence (AI) Policy

Date: 20/05/2026

Review Date: May 2027

Approved by: Management Committee

Policy Lead: Headteacher (Digital, SEND and Inclusion)

1. Policy Intent

Newhaven School is a multi-site Alternative Provision and Pupil Referral Unit serving pupils across the Royal Borough of Greenwich. We recognise that Artificial Intelligence (AI) is increasingly present within education, employment and wider society.

Our approach to AI is ethical, cautious, trauma-informed and pupil-centred. AI may be used where it supports learning, inclusion, accessibility, communication and staff effectiveness, but never as a replacement for professional judgement, safeguarding responsibility, therapeutic relationships or human decision-making.

Newhaven School recognises that AI technologies present both opportunities and significant safeguarding, ethical and operational risks, particularly within Alternative Provision and specialist settings supporting vulnerable pupils.

The school adopts a precautionary approach to AI use and prioritises:

- Safeguarding
- Wellbeing
- Human oversight
- Inclusion
- Privacy
- Dignity
- Equality
- Professional accountability

The school will not adopt or permit any AI system that:

- Replaces human safeguarding judgement
- Processes personal data unlawfully
- Profiles or categorises pupils in discriminatory or harmful ways
- Creates unacceptable safeguarding, wellbeing or reputational risks



- Undermines professional relationships with pupils or families

AI is viewed strictly as a supportive tool and not as a decision-maker.

2. Legal and Statutory Framework

This policy is informed by the following legislation and statutory guidance:

Primary Legislation

- Education Act 2011
- Children Act 1989 and 2004
- Children and Families Act 2014
- Equality Act 2010
- Data Protection Act 2018
- Human Rights Act 1998

Statutory Guidance and National Advice

- UK GDPR
- Keeping Children Safe in Education (latest edition)
- Working Together to Safeguard Children
- Prevent Duty Guidance
- DfE guidance on Generative AI in education
- ICO guidance on AI and data protection
- UK Safer Internet Centre guidance
- Online Safety guidance for schools

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Behaviour Policy
- Staff Code of Conduct
- Data Protection Policy
- SEND Policy
- Cybersecurity Policy
- Image Use Policy
- Acceptable Use Agreements



3. Safeguarding Principles for AI Use

All AI use at Newhaven School must align with statutory safeguarding responsibilities.

AI must never undermine:

- Professional curiosity
- Safeguarding vigilance
- Trauma-informed practice
- Human relationships
- Multi-agency safeguarding responsibilities
- Staff accountability

Particular consideration will be given to:

- Vulnerable pupils
- Pupils with SEND
- Pupils with SEMH needs
- Pupils who are care experienced
- Pupils at risk of exploitation, radicalisation or online harm

Any AI-related concern that may place a child at risk will be treated as a safeguarding concern and managed in accordance with the school's safeguarding procedures.

4. Aims and Objectives

Aims

The aims of this policy are to:

- Ensure AI is used safely, ethically and transparently
- Support high-quality teaching, learning and inclusion
- Protect pupils and staff from harm, exploitation and misuse of technology
- Promote digital literacy and critical awareness
- Maintain compliance with safeguarding, equality and data protection law
- Ensure all AI use remains human-led and professionally accountable

Objectives

The school will:

- Provide clear guidance for staff and pupils
- Monitor risks associated with AI technologies



- Ensure AI does not replace professional judgement
- Promote responsible and age-appropriate AI literacy
- Review practice regularly in response to emerging risks and national guidance

5. Definition of Artificial Intelligence

Artificial Intelligence (AI) refers to digital systems capable of generating, analysing, summarising, predicting or manipulating content including:

- Text
- Images
- Audio
- Video
- Data

This includes generative AI systems, chatbots, image generators, voice cloning tools and automated content systems.

At Newhaven School, AI is regarded solely as a support tool and not a substitute for professional expertise, safeguarding judgement or meaningful human interaction.

6. Roles and Responsibilities

Management Committee

The Management Committee will:

- Ensure compliance with safeguarding, equality and data protection duties
- Monitor the effectiveness of this policy
- Ensure appropriate oversight of AI use

Headteacher

The Headteacher holds overall responsibility for:

- Safe implementation of AI systems
- Safeguarding oversight
- Staff accountability
- Compliance with statutory guidance



Policy Lead

The Policy Lead will:

- Oversee implementation of this policy
- Provide guidance and support to staff
- Ensure alignment with safeguarding and data protection expectations
- Coordinate training and monitoring

Designated Safeguarding Lead (DSL)

The DSL will:

- Maintain oversight of AI-related safeguarding concerns
- Respond to incidents involving harmful AI use
- Ensure safeguarding procedures are followed

All Staff

All staff must:

- Use AI responsibly and professionally
- Maintain professional scepticism regarding AI outputs
- Protect confidentiality and privacy
- Follow approved systems only
- Report concerns immediately
- Remain fully accountable for all decisions and actions

Staff remain professionally and legally responsible for:

- Accuracy
- Safeguarding
- Bias
- Equality
- Copyright compliance
- Communication with families and external agencies

No member of staff may claim that an AI system made a professional decision on their behalf.

7. Approval of AI Platforms

Only AI systems approved by school leadership and relevant data protection leads may be used for school purposes.



Before approval, the school may assess:

- Safeguarding risks
- Data protection compliance
- Age appropriateness
- Content moderation systems
- Cybersecurity standards
- Data storage arrangements
- Bias and misinformation risks
- Terms and conditions

Where required, the school will complete a Data Protection Impact Assessment (DPIA).

Staff must not independently subscribe to or trial AI systems using school data or accounts without authorisation.

The school reserves the right to restrict or prohibit any AI platform at any time.

8. Use of AI by Staff

Approved AI systems may be used to:

- Support lesson planning
- Create differentiated resources
- Adapt materials for accessibility
- Support administrative drafting tasks
- Assist with communication planning
- Support workload reduction where appropriate

AI use must always involve meaningful human oversight.

All AI-generated content must be checked for:

- Accuracy
- Bias
- Suitability
- Safeguarding implications
- Age appropriateness

AI must not be used to:

- Make safeguarding decisions
- Produce EHCP recommendations independently



- Assess mental health risk
- Predict behaviour or criminality
- Draft safeguarding records without DSL oversight
- Generate sanctions or exclusions
- Replace teaching or therapeutic relationships
- Monitor pupils covertly
- Process confidential data unlawfully

Where AI significantly contributes to reports or communications, staff may be required to declare its use.

9. Use of AI by Pupils

Pupils may encounter AI through supervised learning activities and digital literacy education.

Pupils will receive age-appropriate education regarding:

- AI misinformation and hallucinations
- Deepfakes and manipulated media
- Online exploitation risks
- Consent and image misuse
- Copyright and plagiarism
- Bias and discrimination
- Safe and responsible online behaviour

Pupils must not use AI to:

- Bully, harass or intimidate others
- Create harmful or discriminatory content
- Generate fake evidence or impersonations
- Circumvent school filtering systems
- Access extremist or inappropriate material
- Submit AI-generated work dishonestly

Misuse of AI will be managed in line with:

- Behaviour procedures
- Safeguarding procedures
- Online safety procedures
- Examination regulations where applicable



10. AI and Images of Pupils and Staff

Newhaven School adopts a zero-tolerance approach to unsafe or unauthorised AI use involving images, likenesses or voices of pupils or staff.

AI must not be used to:

- Generate images of pupils or staff
- Alter or manipulate photographs
- Create deepfakes
- Clone voices
- Create synthetic avatars
- Face-swap images
- Upload photographs into AI systems
- Simulate real individuals

This applies regardless of intent or educational purpose.

The school recognises that manipulated media presents serious safeguarding, reputational and emotional wellbeing risks.

Any creation, possession or sharing of explicit AI-generated imagery involving children will be treated as a serious safeguarding concern and may involve:

- Children's Social Care
- Police
- LADO referral
- CEOP referral

11. Images for Educational or Publicity Purposes

Only approved photographs or videos captured and stored in accordance with school procedures may be used for:

- Educational activities
- Displays
- Publications
- Social media
- Publicity materials

This use must comply with:

- Parental consent arrangements



- Data protection law
- Safeguarding procedures
- Image Use Policy

AI-generated imagery must never replace authentic images of pupils or staff.

12. AI and SEND

AI may be used to support inclusion and accessibility, including:

- Simplifying text
- Supporting literacy
- Adapting learning resources
- Accessibility support

AI must not:

- Diagnose SEND
- Simulate disabilities
- Replace professional assessment
- Categorise pupils inappropriately

All SEND decisions remain:

- Human-led
- Evidence-based
- Professionally accountable

13. Safeguarding and Wellbeing

Safeguarding remains a human responsibility at all times and cannot be delegated to technology.

AI systems must not:

- Replace DSL judgement
- Assess safeguarding risk
- Diagnose mental health conditions
- Replace pastoral support
- Assess suicide or self-harm risk
- Determine placement or restraint decisions

The school recognises risks linked to:



- Deepfakes
- Sextortion
- Grooming
- Radicalisation
- Harmful chatbot interactions
- Self-harm content
- AI-assisted bullying
- Exploitative online behaviour

All AI-related safeguarding concerns will be responded to immediately in accordance with safeguarding procedures.

14. Online Safety and Harmful Content

The school recognises that AI systems may expose pupils to:

- Harmful or extremist material
- Inaccurate advice
- Grooming risks
- Sexualised content
- Manipulative interactions
- Self-harm or suicide-related material

Filtering, monitoring and supervision systems will operate in line with statutory guidance and the Online Safety Policy.

Staff must remain vigilant to signs that pupils may be:

- Using unsafe AI systems
- Becoming emotionally dependent on AI chatbots
- Sharing inappropriate AI-generated content
- Experiencing distress linked to AI interactions

15. Data Protection and Privacy

All AI use must comply with:

- UK GDPR
- Data Protection Act 2018
- School data protection procedures

Confidential or identifiable information must not be entered into public AI systems.



The school recognises that some AI systems may:

- Retain uploaded information
- Use inputs for machine learning
- Transfer data internationally
- Produce inaccurate outputs

Therefore:

- Personal data must be minimised
- Anonymised examples should be used where possible
- Approved systems only must be used

Any breach involving AI systems will be managed in accordance with data protection and cybersecurity procedures.

16. Cybersecurity and AI

AI technologies may increase risks relating to:

- Phishing
- Malware
- Social engineering
- Fraud
- Impersonation
- Data harvesting

Staff and pupils must not use AI to:

- Generate malicious code
- Attempt unauthorised access
- Create phishing communications
- Bypass security systems

Any suspected cybersecurity incident involving AI must be reported immediately.

17. AI and Assessment Integrity

The school will follow examination board guidance regarding AI use in:

- Coursework
- Controlled assessment
- Examinations



Pupils must not submit AI-generated work dishonestly.

Staff will:

- Teach appropriate referencing where applicable
- Promote academic integrity
- Ensure assessments remain valid reflections of pupil understanding

Misuse may constitute malpractice and will be managed in line with awarding body regulations.

18. Training and Staff Development

Staff will receive regular training regarding:

- Ethical AI use
- Safeguarding risks
- Deepfakes and manipulated media
- Data protection
- Online safety
- Cybersecurity
- Responsible classroom practice

Training will be reviewed regularly in response to emerging technologies and guidance.

19. Communication with Parents and Carers

The school will seek to maintain transparency regarding significant uses of AI.

Parents and carers may:

- Request information regarding AI systems used by the school
- Raise concerns
- Seek clarification regarding data processing

The school reserves the right to restrict pupil access to AI systems where safeguarding concerns arise.

20. Monitoring and Evaluation

AI use will be monitored through:

- Leadership oversight
- Safeguarding review
- Incident monitoring



- Data protection audits
- Staff and pupil feedback
- Compliance checks
- Policy review

Serious incidents may be referred to external agencies where appropriate.

21. Complaints and Concerns

Concerns regarding AI use should be raised initially with the relevant site lead or Policy Lead.

Unresolved concerns may be escalated to the Headteacher in line with the Complaints Policy.

Safeguarding concerns must be reported immediately to the DSL.

22. Policy Review

This policy will be reviewed annually by the Senior Leadership Team and ratified by the Management Committee.

Reviews will reflect:

- Updated statutory guidance
- Technological developments
- Safeguarding expectations
- Emerging risks and best practice

Appendix A – Staff Quick Guidance

Staff Must:

- Use approved systems only
- Maintain confidentiality
- Check all outputs carefully
- Apply professional judgement
- Report concerns immediately

Staff Must Never:

- Upload identifiable pupil data into public AI systems



- Use AI to make safeguarding decisions
 - Generate or manipulate images of pupils or staff
 - Replace professional responsibilities with AI
 - Rely on AI outputs without verification
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Signatures

Headteacher: _____

Policy Lead: _____

Chair of Management Committee: _____