



## THE MULBERRY HOUSE SCHOOL

*All Mulberry House School Policies are always to be read and considered in conjunction with the Equal Opportunities, UN Convention on the Rights of the Child, Safeguarding Policy, Data Protection Policy, Behaviour Policy, Anti-bullying Policy, Race Equality and Inclusion Policies*

### ARTIFICIAL INTELLIGENCE (AI) POLICY

*This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.*

The Mulberry House School is a Rights Respecting School and as Duty Bearers, we take our responsibility seriously and respect the following rights in regards to this policy.

- ◆ **Article 2:** All children, regardless of their ethnicity, sex, religion, language and abilities or other status, have rights under the UN Rights of the Child.
- ◆ **Article 12:** Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously.
- ◆ **Article 13:** All children must be free to express their thoughts and opinions and have access to all kinds of information.
- ◆ **Article 17:** Every child has the right to reliable information from a variety of sources, and the media should provide information that children can understand. Governments and institutions must help protect children from materials that could harm them.
- ◆ **Article 19:** Governments and Institutions must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.
- ◆ **Article 23:** A child with a disability has the right to live a full and decent life with dignity and, as far as possible, independence and to play an active part in the community.
- ◆ **Article 28:** Every child has the right to an education.
- ◆ **Article 29:** Education must develop every child's personality, talents and abilities to the full. It must encourage the child's respect for human rights, as well as respect for their parents, their own and other cultures, and the environment.
- ◆ **Article 31:** Every child has the right to relax, play and take part in a wide range of cultural and artistic activities.

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### INTRODUCTION

The use of artificial intelligence (AI) at The Mulberry House School is closely aligned with the school's wider safeguarding framework. This policy operates alongside the school's:

- Safeguarding and Child Protection Policy
- E-Safety Policy
- Behaviour and Anti-Bullying Policies
- Acceptable Use and Data Protection Policies

The Mulberry House School recognises the growing role and potential benefits of AI within education and school operations. This policy sets out the school's approach to the responsible, ethical and safe use of AI technologies, ensuring that their application supports educational aims whilst upholding the welfare, safeguarding and best interests of pupils at all times.

The purpose of this policy is to provide clear guidance on the management, use and oversight of AI within the school. It establishes expectations for staff and pupils, outlines acceptable and appropriate use, and ensures that AI technologies are implemented in a controlled and transparent manner, consistent with the school's values and professional responsibilities.

This policy also affirms the school's commitment to safeguarding and data protection. Any use of AI systems must comply with the UK General Data Protection Regulation (UK GDPR) and relevant data protection legislation, ensuring that personal data is processed lawfully, securely and proportionately. The school will take reasonable steps to assess risks, monitor practice and review the use of AI technologies to ensure ongoing compliance and to mitigate potential harm.

Through this policy, The Mulberry House School aims to balance innovation with responsibility, enabling the benefits of AI to be realised while maintaining high standards of pupil welfare, professional conduct and regulatory compliance.



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### DEFINITIONS

**Artificial Intelligence:** Artificial intelligence (AI) refers to technology that can make computers learn and have human-like intelligence. A machine can be programmed to perform human-like tasks, based on the information it takes from its surroundings and from previous experience. AI is able to process language, learn and problem-solve.

**Bias:** Some information on the Internet is influenced by the opinion of the creator and is therefore biased.

**Copyright:** A law that prevents people from copying the creative work of others without their permission.

**Generative AI:** Generative AI is a digital tool which can create text, images or videos based on the input it receives.

**Stakeholders:** All people who are involved in The Mulberry House School as an educational setting, for example, staff, pupils, parents, the Directors and Founder.

### KEY OBJECTIVES

This policy aims to:

- Promote the ethical, responsible and lawful use of AI across all areas of the school, ensuring that AI technologies are used in ways that reflect the school's values, uphold professional standards, and prioritise the welfare and safeguarding of pupils.
- Support and enhance teaching and learning through the appropriate use of AI, where it is pedagogically justified, age-appropriate and aligned with the curriculum, while ensuring that pupils continue to develop independent thinking, creativity and critical skills.
- Ensure clarity and consistency in the use of AI by staff and pupils, providing guidance on acceptable and unacceptable practice and supporting staff in making informed, professional judgements about AI use.
- Protect personal data and privacy by ensuring that any use of AI systems involving personal or sensitive data complies fully with the UK General Data Protection Regulation (UK GDPR) and the school's data protection policies, with appropriate safeguards in place.
- Assess and manage risks associated with AI technologies, including potential safeguarding, data protection and ethical risks, through appropriate oversight, monitoring and review.
- Ensure compliance with regulatory and statutory requirements, including those set out by the Independent School Standards, and to support effective leadership and governance in the oversight of emerging technologies.



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### USES OF ARTIFICIAL INTELLIGENCE AT THE MULBERRY HOUSE SCHOOL

The Mulberry House School recognises the use of AI and the benefits it can bring when implemented appropriately and with due regard to safeguarding, data protection and educational purpose. The school adopts a considered and proportionate approach to the use of AI, ensuring that its application supports teaching and learning, enhances professional practice and aligns with the school's values and regulatory responsibilities. The use of AI is considered by the school as part of its wider approach to online safety and safeguarding under KCSIE. AI-related risks are included in the school's online safety risk assessment and are reviewed regularly in line with updated guidance.

#### Use of AI to Support Teaching and Learning

AI tools may be used to support and enhance pupils' learning experiences, where their use is age-appropriate, pedagogically justified and overseen by staff. In particular:

- AI-enabled platforms may be used to provide personalised learning experiences, adapting content and levels of challenge to individual pupils' needs and progress.
- In the Prep II and III classes, Atom Learning, as an adaptive learning platform, may be used to tailor the difficulty and content of digital learning activities (including home learning) based on each pupil's performance, supporting consolidation and extension as appropriate across Maths, Science, Reading Comprehension, Verbal Reasoning and Non-Verbal Reasoning.
- Interactive educational games and intelligent tutoring systems, such as Maths-Whizz, may be used for digital learning activities (including home learning) to provide pupils with personalised feedback and guidance, supporting engagement, confidence and progress in their learning.
- In age-appropriate contexts, staff may use AI tools to generate images, text or examples as a stimulus for discussion, vocabulary development, descriptive writing or creative thinking. In such cases, AI outputs are used as teaching prompts and are not a substitute for the children's own ideas, imagination or work.

The use of such tools does not replace direct teaching or professional judgement. Staff remain responsible for monitoring pupil progress, ensuring appropriate challenge and supporting pupils' independent thinking and learning skills.

#### Use of AI to Support Staff and School Operations

AI tools may also be used by staff to support professional practice and the effective organisation of teaching and learning, including:



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- The use of AI-powered resource creation tools, such as Microsoft Copilot, to assist and support the organisation, planning and creation of teaching and learning materials, where AI tools are used as an aid rather than a substitute for professional expertise.
- Supporting the collection, analysis and tracking of educational data, enabling staff to identify patterns, monitor progress and inform planning, while maintaining confidentiality and data protection.
- staff in generating lesson plans, resources and differentiated materials for individuals or groups of pupils, subject to professional review and oversight.
- Assisting with the analysis of assessment data to identify strengths, gaps and areas for improvement, supporting informed decision-making and targeted support.

### RESPONSIBLE AND ETHICAL USE OF ARTIFICIAL INTELLIGENCE

The Mulberry House School is committed to the responsible, ethical and transparent use of AI. The school recognises the potential risks associated with AI, including issues related to copyright, bias, data protection, accuracy and misuse, and will take appropriate steps to mitigate these risks through clear guidance, oversight and training.

In order to ensure that AI is used safely and ethically, the school will:

- Ensure that all AI tools and software used by staff and pupils are properly licensed, lawful and appropriate for educational use.
- Maintain and consult a record of approved AI tools and software, and require staff to use only those tools that have been reviewed and authorised by the school.
- Promote transparency in the use of AI, ensuring that staff and pupils indicate where, when and how AI tools are used, particularly in the creation of teaching materials, assessments or pupil work.
- Consider and review potential bias and discrimination within AI tools and software prior to approval, recognising that AI systems may reflect or amplify societal biases, and take reasonable steps to mitigate such risks.
- Protect personal data and privacy, ensuring that any use of AI involving personal or sensitive information complies with the UK General Data Protection Regulation (UK GDPR) and the school's data protection policies.
- Ensure accuracy and reliability, requiring staff and pupils to critically evaluate and fact-check information generated by AI tools before it is used or shared.
- Encourage the development of critical thinking skills, supporting pupils to understand the limitations of AI and to question, evaluate and reflect on outputs generated by such tools.
- Provide regular training and guidance for staff on the effective, ethical and appropriate use of AI, ensuring that professional judgement remains central to all decision-making.



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- Verify that all AI tools and software used within the school align with ethical standards in education, the school's values, and its safeguarding responsibilities.

Through these measures, The Mulberry House School seeks to ensure that AI is used in a way that is safe, ethical and educationally purposeful, supporting innovation while maintaining high standards of professional conduct and pupil welfare.

### UNACCEPTABLE USE OF ARTIFICIAL INTELLIGENCE

Pupils must not:

- **Access or use AI tools independently.** Our EYFS and KS1 pupils would only ever use AI tools under the direct supervision and guidance of a member of staff, and only where a tool has been reviewed and approved by the school.
- **Use AI to pretend to be someone else.** The children must not use technology, including AI tools, to pretend to be another child or adult, or to create images, voices or messages that could confuse, upset or mislead others.
- **Use AI tools to create or share unkind, upsetting or unsafe content.** The children should not use AI to generate messages, pictures or videos that are unkind, frightening, inappropriate or could cause harm or distress to others.
- **Rely on AI instead of doing their own learning.** The children should not use AI tools to do their work for them. Any use of AI in learning activities must support understanding and discussion, not replace the children's own thinking, creativity or effort.
- **Share personal information.** The children must not enter personal details such as their name, age, address, photographs or information about others into AI tools or online platforms.

To protect our pupils' welfare, privacy and educational integrity, and to ensure that professional judgement remains central to all decision making, staff must not engage in the following practices when using AI tools or software:

### Professional Judgement and Safeguarding

Staff must not:

- **Rely on AI outputs in place of professional judgement,** particularly in matters relating to safeguarding, wellbeing, SEND, behaviour management or pastoral care. AI tools may support reflection or organisation, but they must never replace direct observation, professional expertise or established safeguarding procedures.
- **Use AI tools to assess risk, make predictions or draw conclusions about pupils,** including automated profiling or categorisation related to behaviour, vulnerability, attainment or emotional state.



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- **Delay or avoid taking action on safeguarding concerns** because of information generated by an AI system. All concerns must continue to be addressed promptly and in line with the school's safeguarding and child protection policies.

### Data Protection and Confidentiality

Staff must not:

- **Input identifiable or sensitive pupil information into AI tools**, including names, photographs, videos, voice recordings, personal circumstances or safeguarding-related information.
- **Upload pupil work or personal data into AI systems where data protection arrangements are unclear or non-compliant**, or where such use has not been explicitly approved by the school.
- **Assume that AI tools are secure or compliant by default**; staff must use only those tools authorised by the school and in accordance with data protection guidance and training.

### Boundaries of Appropriate Use

Staff must not:

- **Introduce or trial new AI tools, platforms or features with pupils without prior approval**, risk assessment and oversight from the school's leadership and relevant coordinators.
- **Permit unsupervised pupil access to AI tools**, particularly open-ended or chat-based systems, or allow pupils to independently generate AI content without staff direction and monitoring.
- **Use AI systems for surveillance, monitoring or tracking of pupils** beyond those systems formally approved and implemented by the school for safeguarding, operational or educational purposes.

### Accuracy, Integrity and Reliability

Staff must not:

- **Use AI-generated content without reviewing, checking and evaluating it for accuracy, appropriateness and bias** before sharing it with pupils, parents or colleagues.
- **Present AI-generated materials as authoritative or error-free**, or rely on them without applying professional scrutiny and contextual understanding.
- **Use AI to produce communications, reports or assessments that have not been reviewed and approved by the relevant member of staff responsible for that area.**



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### Professional Conduct and Accountability

Staff must not:

- **Use AI tools in ways that undermine professional responsibility, transparency or accountability**, including obscuring the use of AI where disclosure is expected or appropriate.
- **Use personal AI accounts or tools for school business** where approved school systems are available and required.

Any misuse of AI, or failure to adhere to this policy, will be addressed in line with the school's professional conduct expectations and relevant policies.

### SAFEGUARDING

#### Safeguarding Risks and Mitigation

In addressing safeguarding risks associated with AI, The Mulberry House School will:

- Proactively assess safeguarding risks associated with the use of AI tools and software before they are introduced, including risks related to exposure to inappropriate content, reduced supervision, over-reliance on technology, and misuse.
- Take specific steps to address risks associated with deep fakes and impersonation, including educating the children about the potential misuse of AI to create false images, audio or video content, and promoting awareness of identity protection and online safety.
- Address risks of bullying, harassment and exploitation, recognising that AI technologies may be used to generate harmful content or facilitate online bullying. Clear reporting procedures and behavioural expectations apply equally to AI-related incidents.
- Remain alert to risks of grooming and exploitation, ensuring that the children do not use AI tools to engage in unsupervised or inappropriate interactions, particularly where external platforms or chat-based tools are involved.
- Ensure age-appropriate access and supervision, with staff oversight of pupil use of AI tools at all times, particularly within teaching and learning contexts.

#### Education, Training and Reporting

The school is committed to fostering a safeguarding culture through education and awareness:



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- Staff will receive appropriate safeguarding training that includes emerging risks linked to AI, enabling them to identify concerns and respond promptly and appropriately.
- Pupils will be taught to use AI safely and responsibly, including understanding risks, recognising potential misuse and knowing how to seek help or report concerns.
- All safeguarding concerns related to the use of AI will be reported and managed in line with the school's safeguarding and child protection procedures, including referral to the Designated Safeguarding Lead (DSL) where appropriate.

### TRANSPARENCY TO STAKEHOLDERS

The Mulberry House School is committed to transparency and open communication with all stakeholders regarding the use of AI. The school recognises the importance of keeping pupils, parents and proprietors informed and reassured about how AI is used, the purposes it serves, and the safeguards in place to protect pupils' welfare, privacy and educational outcomes.

#### Communication and Information

The school will communicate clearly with stakeholders about the use of AI, including:

- Where, when, how and why AI is used within the school, particularly in relation to teaching and learning, assessment, and operational use.
- Information on the educational purpose and benefits of AI tools, alongside the limitations and risks, including safeguarding and data protection considerations.
- Clear signposting to relevant policies, including the AI Policy, Safeguarding and Child Protection Policy, E-Safety Policy and Data Protection Policy.

Information will be shared through appropriate and accessible channels, which may include the school website, policy documentation, parent communications, meetings, training sessions or information events.

#### Management of Data

The Mulberry House School is committed to the lawful, fair and transparent management of data in relation to the use of AI. The school recognises its responsibilities under the UK General Data Protection Regulation (UK GDPR) and related data protection legislation and will ensure that personal data is handled securely, proportionately and in the best interests of pupils at all times.

#### Data Collection, Use and Storage

In relation to the use of AI, the school will:



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- Ensure full compliance with UK GDPR and data protection legislation when using AI tools and software, including adherence to the principles of lawfulness, fairness, transparency, data minimisation and security.
- Use only AI tools and software that are GDPR-compliant and approved by the school, ensuring that any data processed through such systems is limited to what is necessary for clear educational or operational purposes.
- Ensure that all AI tools and software used within the school have appropriate data protection and security features, including controls over access, storage, retention and deletion of data, in line with GDPR requirements.
- Where AI tools such as Microsoft Copilot are used within the school's secure organisational environment, platform indicators may signal the application of enterprise data protections, including restrictions on the use and retention of user data. These indicators support staff awareness but do not remove the need for careful professional judgement, compliance with GDPR, or adherence to school policies regarding personal and sensitive data.
- Provide clear information to relevant parties about what personal data is collected, how it is used, who has access to it, and how long it is retained, through privacy notices and related policies.
- Conduct a Data Protection Impact Assessment (DPIA) where the use of AI is likely to involve new or higher-risk processing of personal data before any implementation goes ahead.

### Consent and Lawful Processing

- Identify and record an appropriate lawful basis for processing personal data, and seek consent where required, in accordance with UK GDPR.
- Ensure that the processing of pupils' personal data through AI tools is necessary, proportionate and appropriate, with particular care taken in relation to children's data and any special category information.

### Rights of Data Subjects

- Ensure that AI tools and software used by the school allow the rights of data subjects to access, rectify and erase personal data, as set out in data protection legislation.
- Respond to data subject requests promptly and within statutory timescales, including those relating to data processed through AI systems.

### Oversight, Monitoring and Training

- Conduct regular reviews and checks of AI tools and software to ensure continued compliance with GDPR and the school's data protection policies.



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- Provide regular training and guidance for staff to support understanding of data protection responsibilities, including the appropriate and responsible use of AI tools.
- Maintain appropriate records of data processing activities, including those involving AI, to support accountability and regulatory compliance.

### Data Breaches and Incident Management

- Maintain an incident record of any data protection or GDPR breaches, including those involving AI tools or software.
- Investigate and respond promptly to any data breaches, following the school's data breach procedures and notifying relevant authorities and affected parties where required.

Through these measures, The Mulberry House School seeks to ensure that AI is used in a way that protects personal data, respects individual rights and maintains the confidence of pupils, parents and staff.

### IMPLEMENTATION AND ACCOUNTABILITY

The Mulberry House School recognises the importance of clear accountability and effective leadership in the implementation and use of AI. Responsibility for the introduction, management and ongoing oversight of AI technologies sits within the school's established leadership and governance structures.

### Implementation Responsibilities

- The Headteacher is responsible for the implementation and day-to-day management of AI tools and software within the school, ensuring that their use aligns with the school's educational aims, values and policies.
- The Computing Coordinator and E-Safety Officer are responsible for:
  - Evaluating the educational value and suitability of AI tools and software prior to use;
  - Ensuring that AI technologies comply with legal, regulatory and ethical requirements, including safeguarding and data protection obligations;
  - Maintaining oversight of the record of approved AI tools used within the school;
  - Arranging and supporting appropriate training for staff to ensure confident, responsible and informed use of AI.

Operational responsibilities may be delegated; however, overall accountability remains with the school's Senior Leadership Team.



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### Compliance and Accountability

- All staff are expected to comply with this policy and related school policies when using AI tools and software.
- Any concerns about the use of AI, including safeguarding or data protection issues, must be reported promptly in line with the school's established procedures.

### Review and Oversight

The Mulberry House School will review the use of AI tools at regular intervals to ensure that their use remains appropriate, effective and compliant with safeguarding, data protection and regulatory requirements.

- Reviews will consider educational impact, emerging risks, changes in guidance or legislation, and feedback from staff and pupils where appropriate.
- Significant updates or developments in the use of AI will be communicated to relevant stakeholders, including parents and the Founder and Directors, where appropriate.

### Governance and Communication

Strategic oversight of AI sits with the school's Directors and Founder (as the school's proprietors), who ensure that appropriate systems, controls and review mechanisms are in place. Through clear accountability, regular review and transparent communication, the school seeks to maintain trust, support informed engagement and ensure confidence in its approach to the responsible use of AI.

### CONCLUSION

The Mulberry House School recognises the potential benefits of AI in supporting teaching, learning and school operations, and is committed to ensuring that its use is purposeful, responsible and aligned with the school's educational values.

This policy provides a clear framework to guide the ethical, safe and transparent use of AI within the school. It sets out expectations for staff and pupils, establishes appropriate safeguards, and ensures compliance with safeguarding and data protection requirements, including UK GDPR.

Through effective leadership, oversight and regular review, The Mulberry House School seeks to harness the benefits of AI while maintaining a safe environment for pupils and staff. The measures outlined in this policy are designed to protect pupil welfare, uphold ethical standards and support the responsible integration of emerging technologies into school life.



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