



Head Teacher: Kirsten MacLeod

## **Newham PRUs AI Usage Policy**

To be read in association with [AI Use in Assessments](#) and [Acceptable Use of Tech Policy](#)

### **Preface:**

At Newham PRUs we believe it is important to approach the use of AI across our school settings with careful consideration, prioritising the well-being and safeguarding of vulnerable students.

AI offers many key benefits, primarily centered around enhancing efficiency and providing deeper insights into student needs. Key areas of benefit include:

- **Streamlining Administrative Tasks:**
  - AI can automate repetitive tasks like report generation, scheduling, and data analysis, freeing up valuable time for leaders to focus on strategic planning and student interaction.
- **Enhanced Data Analysis and Insights:**
  - AI can analyse large datasets to identify patterns in student behavior, attendance, and academic performance, enabling leaders to make data-driven decisions. This is especially useful in PRUs, where students often have complex and varied needs.
- **Personalised Learning Support:**
  - AI-powered tools can assist in creating personalised learning plans, adapting to individual student needs and identifying areas where extra support is required.
- **Improved Safeguarding:**
  - AI can assist in identifying potential safeguarding risks by analysing data concerning patterns, allowing for earlier intervention.
- **Support for Staff Wellbeing:**
  - By reducing the admin burden, AI tools can help to reduce staff stress, which in turn helps to create a better working environment.

We recognise that AI has the potential to empower PRU leadership to operate more effectively, allowing them to dedicate more resources to the core mission of supporting vulnerable students. However we know that adoption of AI should be done cautiously and with the required due diligence around any platforms and tools adopted to ensure that any AI tool complies with the PRUs Policies and values.



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### 1. Purpose:

- This policy outlines the principles and guidelines for the ethical and responsible use of Artificial Intelligence (AI) within our PRU.
- It aims to ensure that AI is used to enhance learning, support student well-being, and improve operational efficiency while safeguarding student data and privacy.

### 2. Guiding Principles:

- **Student Well-being:**
  - AI tools must prioritise the emotional and mental well-being of students.
  - Human interaction and support remain paramount. AI should supplement, not replace, teacher-student relationships.
- **Ethical Use:**
  - AI must be used in a fair, transparent, and non-discriminatory manner.
  - Potential biases in AI algorithms must be recognised and mitigated.
- **Data Privacy and Security:**
  - Student data must be protected in accordance with GDPR and other relevant data protection laws.
  - Clear protocols for data collection, storage, and usage must be established.
- **Safeguarding:**
  - AI tools must not compromise student safety.
  - Robust safeguarding measures must be in place to prevent misuse and potential harm.
- **Transparency and Accountability:**
  - The use of AI must be transparent to staff, students, and parents/guardians.
  - Clear lines of accountability for AI usage must be established.

### 3. Permitted Uses of AI:

- **Personalised Learning:**
  - AI-powered tools sanctioned and authorised by Newham PRUs may be used to provide personalised learning experiences, adapt to individual student needs, and identify learning gaps.
- **Administrative Tasks:**
  - AI tools sanctioned and authorised by Newham PRUs may be used to automate administrative tasks, such as scheduling, data analysis, report generation, and recording of and reporting on meetings and SDS to free up staff time.
- **Behavioral Analysis (with strict ethical guidelines):**
  - AI tools sanctioned and authorised by Newham PRUs may be used to analyse behavioral patterns to identify students at risk, but only with appropriate ethical oversight and consent.
- **Communication:**
  - AI tools sanctioned and authorised by Newham PRUs may be used to improve communications with parents and carers.



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#### 4. Prohibited Uses of AI:

At this time, pupils are not permitted to have direct access to GEMINI or any other AI platform within lessons. Staff are responsible for monitoring pupils in their care to ensure that this approach is enforced until such time that full regulation and monitoring of AI across the school can be suitably monitored and tracked to comply with all GDPR and Safeguarding requirements.

- **Automated Decision-Making:**
  - AI must not be used to make critical decisions regarding student placement, discipline, or assessment without human oversight.
- **Facial Recognition (unless for very specific safeguarding purposes):**
  - The use of facial recognition technology is generally prohibited, except in exceptional circumstances with explicit consent and strict safeguarding protocols.
- **Unauthorised Data Collection:**
  - AI tools must not be used to collect student data without explicit consent and a clear purpose.
- **Use of AI to create student profiles or process student data,**
  - unless through an AI(tool which has been authorised by Newham PRUs.

#### 5. Implementation and Monitoring:

- **Risk Assessment:**
  - A thorough risk assessment must be conducted before implementing any AI tool.
- **Staff Training:**
  - Staff must receive adequate training on the ethical and responsible use of AI.
- **Regular Review:**
  - This policy must be reviewed and updated regularly to reflect advancements in AI technology and best practices.
- **Parental/Guardian involvement:**
  - Parents and guardians must be informed about AI being used, and their input should be welcomed.

#### 6. Data protection:

- All AI usage must comply with the schools data protection policy.
- Data protection impact assessments must be conducted.

#### 7. Online safety:

- All online safety policies must be adhered to, when using AI.



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## Appendices

### 1. AI in Newham PRUs:

#### Expectations regarding the use of AI in Newham PRUs

- We are aware that some pupils or staff members are likely to be using AI in connection with the education or care they receive or provide – for example, pupils using it to help complete homework, or support staff using it to help take case notes or plan lessons. When evaluating the use of AI, we will evaluate the use of AI and ask whether the user has made sensible decisions – the same as we would with any other tool. This may include making sure that any use of AI supports the best interests of children and learners. For example:
  - if AI is used to identify causes of absence, leaders may consider how it forms a part of the approach to tackling absence
  - if a local authority uses AI-generated summaries of child protection conferences, safeguarding leads will want to be assured that these are accurate.
- Like any new technology, AI presents both opportunities and risks in education and social care settings. Risks associated with AI will be assessed against the key functions and areas of use. For example:
  - Data protection: many applications of AI use large amounts of data, which can include personal data.
  - Safeguarding: AI can pose new and unique safeguarding risks.
  - Bias and discrimination: another defining characteristic of AI is that it can make decisions or create outputs based on data without direct human intervention. This introduces a risk that the AI will perpetuate bias and discrimination that is present in the data that it processes or has been trained on.
- **Vulnerable Students:** PRU students often have complex needs. AI implementation must be highly sensitive to these vulnerabilities.
- **Emotional Support:** In a PRU the emotional support of the students is paramount. AI tools should be used to support staff in that role, not replace it.
- **Safeguarding:** Stringent safeguarding measures are essential to protect students from potential risks.

Leaders will make sure their use of AI properly considers these risks and ask the following questions:

- Were those risks considered when introducing the AI application?
- Do they have any assurance processes to identify emerging risks?



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## 2. Guidance

This guidance is intended to provide you with clear guidance on the do's and don'ts of using AI tools, and ensure we protect the personal data of our students, staff, and parents. Understanding the Context:

**GDPR applies whenever we process personal data.** AI tools often involve processing personal data, whether it's student names, learning progress, or even images. We must ensure this processing is lawful, fair, and transparent.

### Do's

- **Use only School-Approved Tools:** Use only AI tools that have been vetted and approved by the school's data protection officer or designated authority. This ensures they meet our data protection standards.
- **Anonymise and Pseudonymise Data:** Where possible, anonymise or pseudonymise data before inputting it into AI tools. This reduces the risk of identifying individuals. For example, use student ID numbers instead of ever using names.
- **Obtain Consent (Where Necessary):** If the AI tool processes personal data in a way that goes beyond our legitimate interests (e.g., using AI for facial recognition or biometric data), obtain explicit consent from the data subject (or their parents/guardians).
- **Ensure Data Security:** Use strong passwords and enable multi-factor authentication for any AI tool accounts. Ensure data is stored securely and access is restricted to authorised personnel.
- **Maintain Transparency:** Be transparent with students and parents about how AI tools are used and what data is being processed. Include information in school privacy notices.
- **Regularly Review and Update:** Regularly review the AI tools you use and their privacy policies. Be aware of any updates to GDPR and how they impact your use of AI.
- **Report Data Breaches:** If you suspect a data breach involving an AI tool, report it immediately to the school's data protection officer.
- **Use AI to enhance current workflow, and not to replace professional judgement:** AI can be used to generate drafts, or to help with data analysis, but critical decisions regarding student welfare and education must be made by qualified professionals.

### Don'ts:

- **Input Sensitive Personal Data:** Avoid inputting sensitive personal data (e.g., health information, religious beliefs, or biometric data) into AI tools unless absolutely necessary and with explicit consent.
- **Use Public or Unsecured AI Tools:** Do not use public or unsecured AI tools that may not have adequate data protection measures in place.
- **Share Personal Data with Unauthorised AI Tools:** Do not share personal data with AI tools that are not approved by the school.
- **Rely Solely on AI for Critical Decisions:** Do not rely solely on AI for critical decisions that impact students' lives, such as grading or disciplinary actions. AI should be used as a tool to support, not replace, human judgment.



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- **Assume AI is Always Accurate:** AI outputs can be inaccurate or biased. Always verify the information generated by AI tools before using it.
- **Store Personal Data in AI Tools Indefinitely:** Do not store personal data in AI tools indefinitely. Follow the school's data retention policy.
- **Upload Photos or Videos of Students without Consent:** Avoid uploading photos or videos of students into AI tools without explicit consent, especially if the tool uses facial recognition or biometric analysis.
- **Use AI tools to create deepfakes or manipulate images/videos:** This can have severe consequences, and is strictly prohibited.

#### Further Support:

The AI Working Party is looking to schedule staff SDS sessions in the near future around our use of AI to ensure everyone is aware of its functions, the possibilities it can offer us, but also the limitations and things to be wary of within educational settings. If you have any questions or require further guidance in the meantime, please contact Mira Gohil or Terry Carter. We are committed to ensuring the responsible and ethical use of AI in our school.

### 3. AI Tools approved for use by Newham PRUs

- GEMINI - through your work login
- AI incorporated within formally approved third party applications (including Camber, CPOMS, BROMCOM)