ARTIFICIAL INTELLIGENCE (AI) POLICY (AI-24 V1.1)

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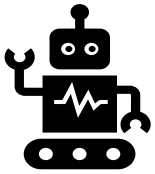
1. Introduction



AI - the ability of a digital computer or computer-controlled robot to perform tasks commonly associated with intelligent beings.

1.1 There are clear benefits and risks associated with processing data (including voice data) using AI solutions/technologies.

1.2 Hollinswood Primary School & Nursery is committed to taking a risk-based approach to the implementation and use of AI. This means:

- Assessing the risks to the rights and freedoms of individuals that may arise when using AI
- Implementing appropriate and proportionate technical and organisational measures to mitigate these risks.
- As a school we subscribe to TeachMateAI which has been verified for Data Protection Compliance by the Local Authority Data Protection Officer.

1.3 This policy is written to ensure that the use of AI is compliant with all applicable laws, regulations and school policies. It supports the ethical and moral use of AI under the school's instruction.

1.4 This policy provides a framework for the use of AI solutions/technology by school employees (whether temporary or permanent), Governors, contractors, agents, vendors and anyone else processing information in pursuit of the school's activities.

1.5 Given the pace of AI development, this policy will be continually developed to ensure it mirrors legislative/regulatory requirements and best practice.

2. Use of AI

2.1 The use of AI solutions/technologies should always support the schools vision, priorities and values.

2.2 Schools that are considering the use of AI should engage with internal stakeholders as part of their due diligence. As a minimum, the schools Data Protection Officer and ICT Support should be consulted on all AI projects.

2.3 In the feasibility stage of plans to use AI, schools must consider the relevant governance requirements, any provider practices if 'off the shelf' applications and/or technologies are procured, copyright, confidentiality, disclosure, accuracy and potential integration with other tools.

2.4 The AI solution should have appropriate logging and auditing mechanisms in place to capture activities related to AI usage.

3. Governance Requirements for Using AI

3.1 Any stakeholder looking to use/implement an AI solution/technology must be fully aware of the schools policies and procedures relating to data. As a minimum the stakeholder must have a good understanding of the requirements detailed in the following documents:

- Data Protection Policy
- Schools Information Security Policy
- Records Management Policy
- Information Sharing Policy
- Schools Information Retention Schedule

3.2 The risks associated with the introduction and use of an AI solution/technology need to be assessed and managed. To assist in the identification, mitigation and management of AI associated risks, the school intending to use AI must complete:

- AI Risk Assessment
- AI Data Protection Impact Assessment

Templates for these assessments can be obtained from the schools Data Protection Officer. Both assessments require approval before the school implements the AI solution/technology.

4. Supplier/Vendor

4.1 Where a school looks to procure AI solutions/technology, engagement should be established with the relevant Information Asset Owner, senior management and developers/vendors.

5. Copyright Considerations

5.1 Copyright law must be complied with when using AI.

5.2 AI must not be used for generating content that infringes upon the intellectual property rights of others, including but not limited to copyrighted materials. If the school is unsure as to whether the intended use of AI may infringe copyright they should contact their legal support.

6. Accuracy of AI Output

6.1 Information produced by using AI solution/technology must be reviewed by the school for accuracy prior to sharing/using the information.

6.2 If the school has any doubt about the accuracy of AI output then AI solutions/technology should not be used.

7. Confidentiality

7.1 Personal and confidential information must not be processed using public AI solutions such as ChatGPT, as this may enter the public domain.

7.2 If the school is planning to use a non-public AI solution, and this will include processing personal data, then as a minimum an AI Data Protection Impact Assessment must be completed.

7.3 Any processing of personal data using an AI solution must comply with the principles of the UK Data Protection Act 2018.

8. Disclosure and Transparency

8.1 If AI is used to create content, the content should be disclosed as containing AI generated information. Any documents and/or publications that include AI generated content should include a statement to make this clear to the reader, an example statement is detailed below:

Note: *This document contains content generated by Artificial Intelligence (AI). AI generated content has been reviewed by the author for accuracy and edited/revised where necessary. The author takes responsibility for this content.*

9. Integration with Other Tools

9.1 API and plugin tools enable access to AI and extended functionality for other services. Schools planning to integrate AI should follow Open AI's Safety Best Practices:

- **Adversarial testing** – testing AI should include typical scenarios as well as tests to 'break' the system
- **Human in the loop (HITL)** – a person should review AI output before it is used more widely
- **Prompt engineering** – reduces the chance of producing undesired content
- **Know your customer (NYC)** – AI users should have to register to use the AI solution and have a unique use rid
- **Constrain user input and limit output tokens** – limiting the amount and type of input/output can reduce the likelihood of misuse/error
- **Allow users to report issues** – a mechanism should be available to allow AI users to log concerns they have while using the AI solution
- **Understand and communicate limitations** – consider whether the AI solution has limitations that could create offensive and/or discriminatory content
- **End-user IDs** – the use of unique user IDs can help detect improper use of AI

9.2 Any relevant API and plugin tools must be rigorously tested for:

- **Moderation** – AI handles inappropriate input that can be categorised as hate, discriminatory, threatening, etc
- **Factual responses** – establish a ground of truth for the API and review responses against this

10. AI Risks

10.1 The use of AI carries inherent risks. Before AI solution/technology is implemented, a thorough risk assessment should be completed. See 3.2 for what assessments are required.

10.2 Each new AI project will have its own context, data flows, output requirements and therefore needs to be assessed individually against the core requirements of this policy. The completion of the risks assessment and AI Data Protection Impact Assessment will assist the school to manage each AI project.

11. Compliance with Legal and Regulatory Requirements

11.1 Data processed by public facing AI solutions may enter the public domain resulting in potential personal data breaches, breaches of confidentiality and/or compromising intellectual property.

11.2 Schools using AI solutions/technology must ensure that this use complies with all applicable laws, regulations and school polices at all times.

11.3 Unauthorised use of copyrighted material or the creation of content that infringes on the intellectual property of others is strictly prohibited.

12. Bias and Discrimination

12.1 Some AI solutions may use and/or generate biased, discriminatory or offensive content. Therefore, schools using AI need to understand this and ensure any AI output is comprehensively checked by a human to ensure biased, discriminatory or offensive content can be censored/removed.

13. Security

13.1 The school is committed to protecting the confidentiality, integrity and availability of its data.

13.2 AI solutions may store personal, sensitive and/or confidential information which could be at the risk of disclosure due to the AI technology being hacked.

13.3 Schools looking to use AI solutions must ensure that the relevant technology in place is secure. Technical controls must be commensurate with the level of risk associated with the information being processed by the AI solution.

13.4 Where the AI solution processes personal data, the school must investigate whether this data can be anonymised.

13.5 Any data processed by an AI solution should be encrypted in transit and at rest.

13.6 The AI solution should have the appropriate security accreditations such as ISO27001, Cyber Essentials+, etc. If the solution uses cloud computing then this should comply with the NCSC 14 Principles of Cloud Computing.

13.7 Schools should check the level of security of any proposed AI solution with their ICT Support and Data Protection Officer.

14. Data Sovereignty and Protection

14.1 Many AI solutions will be hosted internationally. However, under data sovereignty rules any information created or collected in the originating country will remain under the jurisdiction of that country's laws.

14.2 Any AI solution used should be checked for its data sovereignty practices prior to use. If the practices cannot be determined then schools should contact their Data Protection Officer for further advice.

15. Training and Awareness

15.1 All users of AI solutions must receive training on the responsible and secure use of AI. This training should cover topics such as ethical considerations, risk management, security and compliance requirements.

16. Compliance

16.1 This policy applies to all school uses of AI solutions/technology.

16.2 Any suspected or confirmed security incidents related to AI usage must be reported to the Data Protection Officer.

16.3 Failure to comply with this policy may result in disciplinary action being taken.

17. Review

17.1 This policy will be reviewed periodically and updated where necessary to ensure ongoing compliance with all relevant legislation, regulations, other school policies and best practice.

Document Version Control

Version	Date	Author	Sent To	Comments
1.1	**06/11/24**	**R Montgomery**	**Schools/Academies**	**Creation of policy based on SOCITM template.**