Data Protection Impact Assessment (DPIA) for AI Use in Schools

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Project/Processing Activity:
Use of AI to support lesson planning, workload reduction, and administrative efficiency.

Controller:
Walmley Junior School

Data Protection Officer (DPO):
Emma Parker with support from Steve Cullen

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1. Purpose of the Processing

- Generate lesson ideas, teaching resources and administrative content (e.g., letters to parents).
- Support staff by reducing administrative workload.

2. Nature of the Processing

- Staff input prompts into AI.
- AI generates responses used as draft material.

3. Scope of the Processing

- No personal data of pupils, staff, or parents to be input into AI.
- AI outputs will be reviewed and edited before use.

4. Categories of Data Subjects

- N/A — no personal data processed.

5. Categories of Personal Data

- N/A — no personal data processed.

6. Risks Identified

Risk	Likelihood	Impact	Mitigation Measures
Personal data inadvertently inputted into AI	Medium	High	Staff training; policy updated; monitoring
Misuse of AI outputs without review	Medium	Medium	Staff instructed to review all AI outputs
Data sent outside UK jurisdiction (international processing)	Low	Low	No personal data shared; DPIA reviewed annually

7. Measures to Reduce Risk

- Updated Acceptable Use Policy.
- Staff training and briefings.
- Clear rules about non-use of personal or sensitive data.
- Ongoing monitoring of technology use.

8. Assessment Conclusion

Provided mitigation measures are fully implemented, risks are reduced to an acceptable level.

1. Purpose

This policy sets out our school's approach to the use of Artificial Intelligence (AI) tools, including ChatGPT, to ensure they are used safely, ethically, and in compliance with all applicable laws and regulations, including the UK GDPR.

We aim to embrace new technologies to support staff and enhance learning, while maintaining the highest standards of data protection, safeguarding, and professional conduct.

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2. Scope

This policy applies to:

- All staff, volunteers, contractors, and governors.
- All use of AI tools on school devices or systems, or when representing the school.
- Any pupil access to AI tools (under supervision).

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3. Acceptable Use of AI Tools

AI tools may be used for:

- Planning lessons and curriculum resources.
- Drafting communication (e.g., newsletters, reports).
- Generating ideas to support workload reduction.
- Supporting professional development and research.

All AI-generated content must be:

- Reviewed carefully for accuracy and appropriateness.
- Adapted as necessary to meet the needs of our school community.

Professional judgement must always be applied.

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4. Prohibited Use

Staff must **never** input into any AI tool:

- Personal information about pupils, staff, parents, governors, or visitors.
- Special category or sensitive data (e.g., health needs, safeguarding concerns, SEND information).
- Confidential or commercially sensitive information.

Staff must **not**:

- Rely on AI-generated material without verification.
- Use AI tools to make decisions about individuals.

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5. Data Protection and Privacy

- All users must assume that information inputted into AI tools may be stored externally and internationally.
- AI tools such as ChatGPT are external third-party services; they are not under the school's direct control.
- Staff must follow all GDPR, safeguarding and data security protocols at all times.

A Data Protection Impact Assessment (DPIA) has been completed regarding the use of ChatGPT and similar AI tools.

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6. Monitoring and Oversight

- AI use on school systems may be monitored to ensure compliance with this policy.
- Any concerns or breaches must be reported immediately to the Data Protection Officer (DPO).
- Non-compliance may result in disciplinary action under the Staff Code of Conduct.

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7. Training

All staff will receive training on:

- Safe and effective use of AI tools.
- Data protection and ethical considerations related to AI use.
- Identifying and mitigating risks when using AI outputs.

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8. Review

This policy will be reviewed annually, or sooner if significant changes occur in the use of AI technology or relevant legislation.

Closing Summary

“AI can help us work smarter — but it must be handled with the same care and professionalism as all other tools we use.”

Governor/Trustee Briefing: Safe and Effective Use of AI Tools (Including ChatGPT)

Date: 14.09.2025
Prepared by: L M Naughton, Walmley Junior School

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1. Context

Artificial Intelligence (AI) tools, including ChatGPT, are increasingly used across education and industry. Used carefully, they offer potential benefits in terms of:

- Staff workload reduction
- Enhanced lesson planning and resource creation
- Supporting professional development

Our school is adopting a **cautious, risk-managed** approach to the use of AI tools, ensuring compliance with GDPR, safeguarding duties, and educational best practice.

2. Our Current Position

We have developed a full framework to govern the use of AI, including:

- **Data Protection Impact Assessment (DPIA)** completed for AI tool use.
- **Full AI Policy** in place, aligned with DfE, ICO and Ofsted expectations.
- **Updated Acceptable Use Policy (AUP)** to explicitly include AI tools.
- **Staff training programme** delivered on safe and appropriate use.

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3. Key Safeguards

- **No personal or sensitive data** input into AI systems.
- **No unsupervised pupil use** of AI tools.
- **Critical evaluation** of all AI-generated outputs.
- **Staff professional judgement** remains central at all times.
- **Age-appropriate access**: Pupils under 13 do not engage directly with ChatGPT; pupils aged 13+ may do so under supervision, with parental consent where required.

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4. Governance Oversight

- Regular review of AI use at SLT level.
- Annual policy review, or sooner if major technology or legal changes occur.
- Reporting to Governors/Trustees on AI use as part of EdTech and safeguarding reporting cycles.

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5. Next Steps

- Continue training and awareness for new staff.
- Monitor developments in DfE, ICO, and Ofsted guidance.
- Explore safe, structured use of AI to support targeted curriculum and administrative innovations.

In summary:
We are embracing the opportunities offered by AI, but in a careful, professional and fully risk-assessed manner — keeping our pupils, staff, and community safe while supporting innovation.