



Cysgod Y Coed

Generative AI Policy

Document Control	
Document author	Wes Harry
Statutory status	Non-statutory
Website status	On website
Approved by	Management Committee
Date approved	
Approval cycle	2 years
Next review date	

Document history			
Version	Date	Reviewer	Note of revisions





Definition and Purpose

What is Generative AI? Generative AI (Gen AI) refers to artificial intelligence systems capable of creating new content—including text, images, audio, and code—by learning patterns from existing data. Unlike traditional AI that analyses data, Gen AI "generates" something original based on user prompts.

Our Approach: Cysgod Y Coed aims to develop AI literacy, helping staff and learners think critically and verify sources while using these tools to enhance personalized learning and administrative efficiency.

Scope

This policy applies to the entire school community, including staff, learners, volunteers, and governors.

Geographical Scope: It covers activities on school premises and off-site, including home learning, remote working, school trips, and any professional representation of the school.

Technological Scope:

Devices: All school-owned hardware and personal devices (BYOD) used for school-related tasks.

Tools: All cloud-based platforms (e.g., Hwb), mobile applications, and browser-based Gen AI tools.

Emerging Tech: This includes Wearable AI (smartwatches, VR headsets) and Adaptive AI systems.



Roles and Responsibilities

Head of Service and Digital Lead

- Are responsible for the strategic planning of how gen AI will be used in Cysgod Y Coed, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

Designated Safeguarding Person (DSP)

- Our Designated Safeguarding Person / Online Safety Lead has responsibility for online safety in the school. They are expected to have knowledge of gen AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

Data Protection Officer (DPO)

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of gen AI, including related Data Protection Impact Assessments (DPIAs) which will be undertaken when considering use of any digital tools and services that may use personal data. Where personal data will or may inadvertently be used the school will ensure that data subjects rights are upheld. In these cases, privacy notices will be provided

Technical Staff

Technical staff from SRS will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems.

Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of gen AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that:

- the PRS environment is safe
- all personal, sensitive and confidential data / information is secure
- that their actions do not put the reputation of Cysgod Y Coed at risk and that
- learners understand their responsibilities

Management Committee

We ensure that our Management Committee has a good understanding of how gen AI is used in an educational context and potential benefits and risks of its use. They receive regular training and updates, enabling them to support Cysgod Y Coed and challenge where necessary. This may include evaluation of the use of gen AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated.



Parents/carers

We work hard to engage parents and carers by:

- regular progress reports
- sharing information online e.g., website, social media
- providing curriculum information

Our parents and carers are made aware of how gen AI is used in Cysgod Y Coed and receive guidance on both good practice in its use and the risks of misuse that may affect their child's learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.

Vulnerable groups

We recognise that vulnerable learners are more likely to be at risk from the misuse of gen AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of gen AI, while being aware of the potential risks.

Children are considered vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". As set out above, a thorough DPIA is essential.

Vulnerable Learners and Assistive Technology

We recognize that many of our learners may be considered vulnerable data subjects.

- **Assistive Tools:** We actively support the use of AI-driven assistive technologies (e.g., speech-to-text, reading support) to provide full curriculum access to learners with additional needs.
- **Safeguarding:** All use of AI for vulnerable learners must be preceded by a thorough DPIA to mitigate "high risk" data processing.

Integration with Hwb and Curriculum

We utilize the **Hwb** learning platform as our primary gateway for digital tools. Our curriculum integration includes:

- **Hwb Guidance:** Utilizing Hwb-specific resources for AI literacy and digital citizenship.
- **Critical Thinking:** Using Gen AI to support development of critical thinking and information verification.
- **Professional Development:** Staff are encouraged to use the "AI Foundations" module available via Hwb.





Age-Specific AI Guidance

Our educational approach ensures that knowledge and understanding of AI are delivered where appropriate and relevant within the curriculum. We use the following tiers to guide how learners interact with generative AI:

Tier 1: Foundation & Lower Primary (Ages 5–8)

- **Focus:** Awareness and Safety.
- **Guidance:** Learners at this stage should not use Gen AI tools independently.
- **Activity:** Teachers may use AI-generated images or stories as "spark" prompts for discussion, focusing on the idea that "computers can make things, but humans decide if they are good".
- **Key Lesson:** Understanding the difference between a real person and an AI "bot".

Tier 2: Upper Primary & Lower Secondary (Ages 9–13)

- **Focus:** AI Literacy and Critical Evaluation.
- **Guidance:** Use is strictly supervised and focused on specific classroom tasks.
- **Activity:** Comparing AI-generated information with trusted sources (like Hwb resources) to spot "hallucinations" or mistakes.
- **Key Lesson:** Data privacy—learning never to share personal information, photos, or school details with an AI tool.

Tier 3: Upper Secondary & Post-16 (Ages 14+)

- **Focus:** Ethics, Bias, and Professional Use.
- **Guidance:** Learners may use approved tools (e.g., Co-Pilot via Hwb) to assist with brainstorming or structuring work, provided all AI use is clearly cited.
- **Activity:** Investigating algorithmic bias and how AI can reflect or amplify stereotypes.
- **Key Lesson:** Intellectual property and the ethical implications of using AI-generated content in assessments.





Hwb Platform Integration by Age

The school utilizes the **Hwb** platform to provide age-appropriate "walled gardens" for digital exploration.

- **Filtered Access:** We use Hwb's centralized filtering to ensure that Gen AI tools are only accessible to age groups for which they are deemed safe and appropriate.
- **Resource Navigation:** Staff will direct learners to age-specific Hwb playlists and "Common Sense Education" materials to build resilience against online risks.
- **Staff Oversight:** All staff are expected to complete the "AI Foundations" module on Hwb to better support learners in these different age brackets.

Reporting

Our reporting systems are well promoted, easily understood and easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties.

Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows Cysgod Y Coed safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All gen AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, local authority, DPO, ICO. Any breaches must be reported to ICO within 72 hours of the PRS becoming aware a breach has occurred.
- All AI related incidents will be recorded through Cysgod Y Coed's normal recording systems

In the case of misuse of gen AI by staff, the normal staff disciplinary processes will be followed. If the misuse involved personal data and was deliberate / negligent, could constitute a criminal offence under S170 of the Data Protection Act 2018.





Risk assessment

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

Cysgod Y Coed understands that despite many positive benefits in the use of gen AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being
- Duty of care

Education and training

Cysgod Y Coed's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including gen AI.

This policy outlines our commitment to integrating gen AI effectively within our learning and supportive environment. We will use gen AI responsibly, safely and purposefully to support with a variety of tasks such as:

- assisting with some routine administrative functions
- helping provide more personalised learning experiences
- supporting lesson planning, marking, feedback and reporting
- providing contexts to support development of critical thinking skills
- supporting PRS-level curriculum and assessment design

AI literacy, which includes being able to think critically, engage with evidence and information, verify sources and use creativity, will be fundamental. The [skills integral to the four purposes](#), which should be developed across all Areas of Learning and Experience in the Curriculum for Wales, are focused on building these dispositions. Our approach is to deliver this knowledge and understanding where it is appropriate and relevant in our curriculum.

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting's risk profile. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this by:

- Engaging with learners
- Critical evaluation of emerging trends and research findings
- Seeking advice from technical experts and our Data Protection Officer.
- Surveys
- Pupil Voice
- Parental engagement
- Staff consultation
- Staff training

As gen AI becomes an integral part of modern education, it is important that staff develop the knowledge and skills to integrate gen AI tools responsibly into teaching, learning, and





administrative processes. By fostering AI literacy, staff can confidently prepare learners for a future where AI is a key driver of innovation and opportunity.

- We will support and ensure all staff can access training on the effective, responsible, lawful and ethical use of emerging technologies in education.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including 'Keeping Learners Safe'.
- We will support staff to identify, assess, and mitigate risks associated with gen AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will support staff to ensure compliance with UK GDPR and other relevant regulations while using gen AI systems.
- We will promote ethical practices in the use of gen AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower staff to teach learners about the safe and ethical use of gen AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.

Emerging Technologies: Wearable and Adaptive AI

While this policy focuses on Generative AI, the school acknowledges that other AI-driven technologies, such as **Wearable AI** (e.g., smartwatches, AR/VR headsets, biometric sensors), are becoming increasingly prevalent in education.

- **Data and Safeguarding:** The use of Wearable AI introduces new considerations, especially concerning the collection of real-time personal and sensitive data (e.g., physiological, behavioural, and location data).
- **Unauthorised Data Collection:** Staff and learners **MUST NOT** use unapproved personal Wearable AI devices that actively record, process, or store sensitive or personal data (e.g., location, biometric, audio, or visual data) on school premises or during school activities.
- **Inputting Sensitive Data:** Personal data, learner data, or other sensitive confidential information **MUST NOT** be inputted into any Wearable or Adaptive AI tool that has not been specifically vetted, approved, and had a DPIA (Data Protection Impact Assessment) completed for that purpose.
- **Policy Extension:** Any future plans to deploy non-Generative AI tools, including Wearable AI, will be subject to a rigorous, documented risk assessment. This assessment will ensure the educational benefits clearly outweigh any risks and that the deployment ensures strict compliance with our **Data Protection Policy** and robust safeguarding protocols.
- **Purpose of Use:** Where adopted, these tools will be primarily considered for enhancing personalized learning, supporting student well-being, or facilitating immersive educational experiences.

The following resources are used:

- [Generative AI – Hwb guidance](#) - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- [Hwb - Sharing nudes and semi-nudes: Responding to incidents and safeguarding children and young people](#)
- Common Sense Education [AI literacy](#) and [digital citizenship](#) materials





- [Curriculum for Wales - Hwb](#)
- [AI Foundations: training module for education practitioners](#)
- [Generative AI – Hwb guidance](#) - Resources, guidance and information for education practitioners, learners, and families on gen AI.
- ICO

Additional links

- [SWGfL – Artificial Intelligence and Online Safety](#)
- [Understanding AI for school – Tips for School Leaders](#) - ASCL, NAHT, CST, and other



Appendix 1 - Risk Assessment Matrix for Schools Implementing gen AI
Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
Gen AI training	Insufficient training or guidance impacting the ability of staff to adopt, use, and monitor gen AI safely and ethically within their school.	Low	Low	Low	Ensure all staff can access regular training to support the safe and ethical use of gen AI in teaching and learning.
Data Protection and Privacy Breaches	Complexity of the tech and contracts will make it hard for schools to fully understand what use the gen AI provider will make of data inputted (including inadvertent provision of personal data). Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.	Low	High	Low	Due diligence including advice from DPO before signing contract. Implement strong encryption, regular audits, and UK GDPR-compliant data management policies and conduct regular privacy audits.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.	Low	Low	Low	Monitor gen AI communication tools, implement clear reporting mechanisms, and provide learner support.
Over-reliance on gen AI	Over-reliance on gen AI tools reducing interpersonal interactions among learners.	Low	Low	Low	Encourage collaborative learning activities and balance gen AI use with social engagement.



	Reduction in teacher autonomy and critical decision-making by overusing gen AI tools.				Define clear boundaries for gen AI use and regularly review its impact on pedagogy.
Emotional Manipulation	Gen AI systems unintentionally affecting learner mental health through curated content.	Low	Medium	Low	Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	Gen AI exposing learners to harmful or unsuitable materials / behaviour	Low	Low	Low	Conduct rigorous testing of gen AI tools, apply effective filtering and monitoring and ensure human oversight.
Mental Health Impacts	Overuse of gen AI tools causing stress, anxiety, or dependency in learners.	Low	Medium	Low	Monitor usage patterns, provide mental health resources, and set expectations on use of gen AI systems.
Bias and Discrimination	Gen AI systems propagating biases that impact learner wellbeing or inclusion. Gen AI models producing discriminatory or biased outcomes.	Medium	Low	Low	Regularly audit gen AI algorithms for bias and provide inclusive media literacy education and training.
Misuse of AI	Learners using gen AI tools for harmful, unethical or illegal purposes (e.g. nudification).	Medium	Medium	Low	Educate learners on responsible and appropriate gen AI use and establish clear usage policies.





Misinformation	Creation or spread of harmful or misleading AI-generated content.	Medium	Low	Low	Educate staff and learners to verify gen AI outputs and establish clear policies for verifying content authenticity.
Digital Divide	Inequitable access to gen AI tools among learners from diverse demographic groups.	Medium	Medium	Medium	Provide equitable access to gen AI resources and ensure alternative solutions are available.
AI Ethics Awareness	Lack of awareness among staff and learners about ethical implications of gen AI.	Low	Low	Low	Provide training and education on gen AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	Gen AI systems generating inaccurate or misleading recommendations.	Low	Low	Low	Regularly validate gen AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding gen AI usage and learner data.	Low	Low	Low	Understand legal requirements. Conduct legal reviews and consult experts on gen AI-related regulations.
Cyber-Security	Increased use of gen AI tools in cyberattacks targeting school systems and data.	Low	Low	Low	Strengthen cybersecurity protocols and educate staff and learners on safe online practices.



**Likelihood and Impact Definitions**

- **Likelihood:**

The likelihood that the identified risk will occur.

- Low: Unlikely to occur under normal circumstances.
- Medium: Possible occurrence based on past trends or vulnerabilities.
- High: Likely to occur without intervention.

- **Impact:**

The severity of impact should the risk materialise.

- Low: Minimal disruption with limited consequences.
- Medium: Moderate disruption affecting key processes.
- High: Significant disruption with severe consequences.

Action Plan

1. Appoint a safeguarding lead who will work closely with the digital lead and DPO to oversee gen AI implementation from a learner welfare perspective and ensure personal data of learners and staff is protected.
2. Deliver regular training for staff on online safety, AI ethics, and responsible use.
3. Review curriculum offer to identify where gen AI-related issues might be incorporated into learning in relevant and appropriate parts of the curriculum.
4. Establish transparent reporting mechanisms for reporting any safeguarding or wellbeing concerns linked to gen AI, as well as for any data protection incidents that involve personal data.
5. Collaborate with parents and carers to raise awareness about gen AI risks and best practices.
6. Conduct annual reviews of gen AI tools and their impact on learner wellbeing, updating the risk matrix as needed.

Review and Update

The PRS will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.



Appendix 2 - Staff (and Volunteer) Use of Generative AI (Gen AI) Acceptable Use Agreement Template

Cysgod Y Coed Policy

Emerging technologies, including gen AI, are increasingly integrated into educational settings and the lives of staff and learners. These technologies have potential to enhance creativity, promote personalised learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, ethical application and legal compliance.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of gen AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of gen AI.
- Staff have a clear understanding of their responsibilities when engaging with gen AI and emerging technologies in professional and personal contexts.

Acceptable Use Policy Agreement

I understand that I must use gen AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of gen AI tools and technologies.
- I will only use gen AI tools and technologies for purposes authorised by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data. The currently approved AI tools are:
 - Co-Pilot
 - Gemini
 - Adobe AI
- I will ensure that any sensitive or personally identifiable information about staff, learners, or parents/carers is only entered into gen AI systems that have been through a DPIA process.
- I will report any gen AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt gen AI outputs.
- I will critically evaluate the outputs of gen AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight and in compliance with the UK GDPR.
- I will communicate professionally and responsibly when using gen AI systems.
- I will ensure transparency by ensuring attribution where gen AI has been used and providing a privacy notice if personal data has been used.

**When engaging with learners:**

- I will support learners on the safe, ethical, appropriate and effective use of gen AI.
- I will use gen AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the PRS's systems and resources:

- I will use gen AI systems in compliance with established security measures and access protocols.
- I will ensure that any gen AI applications used in teaching or administration are vetted by the DPO and comply with the PRSPRS policies.
- I will ensure gen AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using gen AI for any purpose.
- I will ensure there is lawful basis for uploading sensitive school-related information into gen AI systems, established as part of the DPIA process.

Responsibility and Accountability:

- I will use gen AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of gen AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all gen AI-related activities within and outside of school premises that are connected to my professional responsibilities.





Appendix 3 - Gen AI Tools Request Form template

It is recommended that schools only allow the use of Gen AI tools which have been approved by the school. The form below allows you to seek approval for the use of tools which you have found to be useful and are likely to meet the school's approval criteria.

Contact person:

Position:

Date of request:

Gen AI Tool/Resource Details

Name of AI tool/resource:

Purpose of use:

Expected benefits:

Potential risks:

The following points have been acknowledged: (please circle – **YES / NO**)

- **GDPR UK compliance:** Users of Gen AI must uphold their data protection responsibilities in accordance with the General Data Protection Regulation (GDPR UK).
- **Acceptable use agreement:** Users of Gen AI must ensure that its use is consistent with the school's Staff Acceptable Use Agreement and should understand their responsibilities for mitigating associated risks, as outlined here:
<https://hwb.gov.wales/support-centre/education-digital-standards/generative-artificial-intelligence-in-education#considerations-for-schools-and-settings-around-generative-ai>
- **Gen AI use case:** Users must establish a clear purpose for deploying and using specific Gen AI tools through effective and ethical use

Appendix 4: Learner Acceptable Use Agreement template

1. **Safety First:** I will only use AI tools that my teacher has approved.
2. **Privacy:** I will never put my own name, address, or my friends' personal information into an AI.
3. **Honesty:** I will always tell my teacher if I have used AI to help me with my work.
4. **Critical Thinking:** I understand that AI can sometimes make mistakes or be biased, so I will check the facts.
5. **Kindness:** I will never use AI to create images or text that could hurt, bully, or trick others.





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This policy was approved by the Management Committee



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Signed: ... Louise Wilce Chair of the Management Committee

Date:May 2026.....

Signed: ...Jake Parkinson..... Head of Cysgod y Coed

Date: May 2026



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