The Westminster
Specialist College

2025/2026

Artificial Intelligence (AI) Policy

Approved by Board of Governors on:	**8/7/2025**
Signed by Chair of Governors:	P Coldicott
Head of College:	O Flowers
Lead Personnel:	**B Taylor**
Date of Review:	**8/7/2026**

1. Aims and scope

As a specialist employment-focused college delivering the DFN Project SEARCH model, The Westminster Specialist College leverages AI not only in classroom instruction but also in real-world work settings, including placements with NHS and ASDA. AI supports interns with SEND in developing workplace readiness, capturing EHCP-related progress, enabling accessible communication, and streamlining curriculum planning. All AI use aligns with safeguarding protocols, host employer expectations, and inclusive educational practice.

Here at The Westminster Specialist College we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for colleges. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations.

Therefore, the aim of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole college community.

This policy covers the use of AI tools by college staff, governors and interns. This includes generative chatbots such as ChatGPT and Google Bard (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, governors and interns for a future in which AI technology will be an integral part
- Promote equity in education by using AI to address learning gaps and provide personalised support
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and interns
- Protect the privacy and personal data of staff, governors and interns in compliance with the UK GDPR

1.1 Definitions

This policy refers to both ‘open’ and ‘closed’ generative AI tools. These are defined as follows:

Open generative AI tools are accessible and modifiable by anyone. They may store, share or learn from the information entered into them, including personal or sensitive information (e.g. ChatGPT).

Closed generative AI tools are generally more secure, as external parties cannot access the data you input (e.g. MeetGeek).

2. Legislation

This policy reflects good practice guidelines/recommendations in the following publications:

AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence

Generative artificial intelligence (AI) and data protection in schools, published by the Department for Education (DfE)

This policy also meets the requirements of the:

UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020

Data Protection Act 2018 (DPA 2018)

3. Regulatory principles

We follow the 5 principles set out in the AI regulation white paper.

REGULATORY PRINCIPLE	WE WILL …
Safety, security and robustness	Ensure that AI solutions are secure and safe for users and protect users' data Ensure we can identify and rectify bias or error Anticipate threats such as hacking
Appropriate transparency and explainability	Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate
Accountability and governance	Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment

4. Roles and responsibilities

4.0 AI lead

Our generative AI lead is Oliver Flowers (Principal) They are responsible for the day-to-day leadership, ownership and management of AI use in the college.

4.1 Governing board

The governing board will:

Take overall responsibility for monitoring this policy and holding the Principal and Head of College to account for its implementation in line with the college's AI strategy

Ensure the AI lead is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the college

Adhere to the guidelines below to protect data when using generative AI tools:

- Use only approved AI tools (see section 5)
- Seek advice from the data protection officer and AI lead, as appropriate
- Check whether they are using an open or closed generative AI tool
- Ensure there is no identifiable information included in what they put into open generative AI tools
- Acknowledge or reference the use of generative AI in their work

- Fact-check results to make sure the information is accurate

4.2 Principal (AI Lead)

The Principal/ AI Lead will:

Take responsibility for the day-to-day leadership and management of AI use in the college

Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation

Ensure that the guidance set out in this policy is followed by all staff

Review and update this AI policy as appropriate, and at least annually

Ensure staff are appropriately trained in the effective use and potential risks of AI

Make sure interns are taught about the effective use and potential risks of AI

Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, AI lead and data protection impact assessments

4.3 Data protection officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO is commissioned out to SIPS Education and is contactable via 0121 296 3000.

4.4 Safeguarding lead

The safeguarding lead is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

Being aware of new and emerging safeguarding threats posed by AI

Updating and delivering staff training on AI safeguarding threats

Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE)

4.5 All staff

As part of our aim to reduce staff workload while improving outcomes for our interns, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

Use only approved AI tools (see section 5)

Seek advice from the AI lead or DSL, as appropriate

Check whether they are using an open or closed generative AI tool

Ensure there is no identifiable information included in what they put into open generative AI tools

Acknowledge or reference the use of generative AI in their work

Fact-check results to make sure the information is accurate

All staff play a role in ensuring that interns understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide interns in critically evaluating AI-generated information and understanding its limitations.

Staff may wish to capture notes of teams meetings, board meetings, one to one meetings or HR meetings using AI. The approved product for this is MeetGeek AI. Before the meeting starts, all meeting participants will be made aware of the AI as a notetaking tool and consent to its use. The person chairing the meeting will not share the content outside of the organization without the prior consent of the meeting participants. The summary of the meeting, including the actions, can be shared by the chair of the meeting with the participants. The audio captures, transcripts and video content (if online through Teams) must not be shared outside of the college organization.

4.6 Interns

Interns must:

Follow the guidelines set out in section 7 of this policy ('Use of AI by interns')

5. Staff and governors use of AI

5.1 Approved use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete, but cannot replace the judgement and knowledge of a human expert.

Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it.

Always consider whether AI is the right tool to use. Just because the college has approved its use doesn't mean it will always be appropriate.

Note that open-source AI tools / open AI tools, meaning tools which anyone can access and modify, should only be used for tasks that don't require personal information to be input.

Approved tools	**Approved uses**	**Unauthorised use**
KeyGPT	• Template letter to parents/carers • Template job descriptions and adverts • Interview questions	No student, parent or staff data to be copied, pasted or typed into the platform.
Oak Academy AI lesson planner (Aila)	• Lesson ideas and planning • Slide Decks • Quizzes • Worksheets	No student, parent or staff data to be copied, pasted or typed into the platform.
Chat GPT	• Lesson ideas and planning • PowerPoint creator • Template letter to parents/carers • Template job descriptions and adverts • Interview Questions	No student, parent or staff data to be copied, pasted or typed into the platform.
Brisk	• Template letters • Lesson ideas • PowerPoint creator • Any items from the: Create Section (Curriculum Essentials, Admin Tasks and Interventions), Give Feedback Section, Change Level Section and Boost Student Activity Section.	No student No student, parent or staff data to be copied, pasted or typed into the platform. parent or staff data.
Magic College	• Lesson ideas and planning • Slide Decks • Quizzes	No student, parent or staff data to be copied, pasted or typed into the platform.

	• Worksheets • Anything from the All Tools Section (no personal content to be uploaded).	
MeetGeekAI	• Internal Meeting Notes • External Meetings Notes • Teams Meeting Notes • Distribution of the above.	No student, parent or staff data to be copied, pasted or typed into the platform.
Microbit.org	• Specific Microbit AI Projects	No student, parent or staff data to be copied, pasted or typed into the platform.
Microsoft 365 CoPilot	• Chatbot	No student, parent or staff data to be copied, pasted or typed into the platform. No Agent use of third party tools.

5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the Vice Principal to submit a request to use other AI Tools. They will then present the request to the AI Lead to discuss any ideas they may have with regards to using AI, so the AI Lead can take the suggestions forward if they deem it to be a satisfactory new method of working.

The AI Lead is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the the DPO and data protection impact assessments.

5.3 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots. No personal and sensitive data can be entered into any open AI Tools even if they are authorised.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, The Westminster Specialist College will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy.

5.4 Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Interns own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

Interns' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race and disability. This means that critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output before relying on it.

We will ensure we can identify and rectify bias or error by training staff in this area.

We also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or interns have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.

5.6 Raising concerns

We encourage staff and governors to speak to the Principal in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

5.7 Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our college's equality policy when using generative AI tools .
- Consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output
- Fact and sense-check the output before relying on it

Staff and governors must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

6. Educating interns about AI

Here at The Westminster Specialist College we acknowledge that interns benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that interns develop the right skills to make the best use of generative AI.

These emerging AI concepts will be covered within the Technology module of the College Curriculum knowledge guidance

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

7. Use of AI by interns

We recognise that AI has many uses to help interns learn. Interns must not share personal information of themselves or other with any AI tools.

At present, interns may use AI tools:

- As a research tool to help them find out about new topics and ideas or to help them simply content so they can understand concepts.
- When specifically studying and discussing AI in college work, for example in IT lessons or about AI-generated images

All AI-generated content must be properly attributed and appropriate for the interns' age and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, interns may not use AI tools:

- During assessments, including internal and external assessments, and coursework
- To write their homework or class assignments, where AI-generated text is presented as their own work

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, interns should reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures as set out in our exams policy.

Interns must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our exams policy for more details.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments.

9. Staff training

Staff will be provided with annual training about the use of AI within the context of the college. As the new technologies emerge and the college begins to test and adopt them more widely, staff will be kept up to date with developments in AI, and how they will be able to develop and improve their practice on a regular basis. This will be through AI insight events, CPD and bulletins. These will form the basis of CPD events throughout the college calendar.

10. Breach of this policy

10.1 By staff

Breach of this policy by staff will be dealt with in line with our staff code of conduct, data protection and/or the college disciplinary policy.

Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- During or outside of working hours
- On an individual's own device or a college device
- At home, at college or from a remote working location

Staff members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- The generative AI application in question (whether or not it is one authorised by the college)
- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the Principal or Head of College immediately.

10.2 By governors

Governors found in breach of this policy will contact the Principal and the College's DPO at SIPS education.

10.3 By interns

Any breach of this policy by a pupil will be dealt with in line with relevant policy.

11. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by The Principal and AI Lead and will report to the College Resources Committee whenever there is a significant change to either AI use by the college or the associated risks of AI usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

The policy will be shared with the full governing board at least annually.

All staff are expected to read and follow this policy. The AI Lead is responsible for ensuring that the policy is followed.

The AI Lead will monitor the effectiveness of AI usage across the college.

We will ensure we keep members of the college community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from interns, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in college.

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Wellbeing and Engagement (Behaviour) policy
- Equality policy

13. Appendix – List of Approved Tools and Uses

Approved tools	Approved uses	Unauthorised use
KeyGPT	Template letter to parents/carers Template job descriptions and adverts Interview questions	No student, parent or staff data to be copied, pasted or typed into the platform.
Oak Academy AI lesson planner (Aila)	Lesson ideas and planning Slide Decks Quizzes Worksheets	No student, parent or staff data to be copied, pasted or typed into the platform.
Chat GPT	Lesson ideas and planning PowerPoint creator Template letter to parents/carers Template job descriptions and adverts Interview Questions	No student, parent or staff data to be copied, pasted or typed into the platform.
Brisk	Template letters Lesson ideas PowerPoint creator Any items from the: Create Section (Curriculum Essentials, Admin Tasks and Interventions), Give Feedback Section, Change Level Section and Boost Student Activity Section.	No student No student, parent or staff data to be copied, pasted or typed into the platform. parent or staff data.
Magic College	Lesson ideas and planning Slide Decks Quizzes Worksheets	No student, parent or staff data to be copied, pasted or typed into the platform.

	Anything from the All Tools Section (no personal content to be uploaded).	
MeetGeekAI	Internal Meeting Notes External Meetings Notes Teams Meeting Notes Distribution of the above.	No student, parent or staff data to be copied, pasted or typed into the platform.
Microbit.org	Specific Microbit AI Projects	No student, parent or staff data to be copied, pasted or typed into the platform.
QuickAction	Drafting meeting minutes (e.g. Annual Reviews) Transcribing meetings (in person and online) Using closed AI models to reformat data and information.	This is closed AI and kept securely in line with Data Protection and GDPR legislation.
Microsoft 365 CoPilot	Chatbot	No student, parent or staff data to be copied, pasted or typed into the platform. No Agent use of third party tools.

This list of approved tools and uses was reviewed on 25th June by Mr O M Flowers (Principal and AI Lead).

Appendix – 1 – Parent Consent Form

Using AI Technology to Support Annual Reviews

Parent & Carer Information Sheet

Our Commitment to Transparency and Safeguarding Your Young Person's Information

Why We Are Using AI in Annual Reviews

As part of our commitment to improving the quality and accuracy of our Annual Review process, we are working with Agilisys, a trusted public sector technology provider, to trial the use of a secure AI transcription tool called QuickAction.

QuickAction is used to automatically generate a written transcript of the Annual Review meeting. This helps ensure we:
- Accurately capture the voices of all participants
- Focus the meeting on your child's strengths, needs, and aspirations
- Produce high-quality minutes and updates for the Education, Health and Care Plan (EHCP)

No decisions are made by the AI tool. It is simply used to record and transcribe what is said.

How We Protect Your Privacy

We are committed to using this technology responsibly and in full compliance with all applicable data protection laws.

Key legal frameworks we follow include:
- UK GDPR (General Data Protection Regulation)
- Data Protection Act 2018
- Children and Families Act 2014 (SEND Code of Practice)
- Department for Education Guidance: Generative AI in Education (June 2025)

How It Works

1. The Annual Review meeting is audio recorded using a secure device.
2. The recording is processed through QuickAction, which converts the conversation into text.
3. The college's SEN team checks the transcript and uses it to write:
- Clear and accurate minutes of the meeting
- Updates to the EHCP based on the discussion

Data Security

- All recordings and transcripts are handled securely and stored in encrypted environments.
- Access is restricted to authorised college staff and professionals involved in the EHCP process.
- No data is used to train or improve the AI tool.
- Recordings are deleted once the final EHCP update is completed and confirmed.

Your Rights and Consent

You have the right to:
- Ask questions about how the tool is used
- Refuse consent for audio recording and transcription
- Withdraw consent at any time by contacting the college SENCo
- Request access to the transcript or final EHCP update

We will not proceed with the use of this AI tool without your explicit consent.

Parent/Carer Consent Form

Use of AI Transcription for Annual Review Meetings

Student Name	_____
Date of Annual Review	_____
College Name	_____

I have read and understood the information about how AI transcription is used to support the Annual Review process at The Westminster Specialist College.

I understand:
- The purpose of using QuickAction AI to create a transcript of the meeting
- That this data will be securely stored, accessed only by authorised staff, and deleted after use
- That I can withdraw consent at any time
- That no decisions are made by the AI and my young person's needs remain at the heart of the process

Please tick one:

☐ **I give consent** for the Annual Review meeting to be audio recorded and transcribed using the QuickAction AI tool by Agilisys.

☐ **I do not give consent** for the use of AI transcription and prefer manual note-taking to be used during the meeting.

Parent/Carer Name: _____

Signature: _____

Date: _____

Questions?

If you have any questions about this process, please contact our College AI Lead (Mr O Flowers – Principal) at

Thank you for your ongoing support in helping us improve the Annual Review process.

Appendix – 2 – Learner Consent Form

Using AI Technology to Support Annual Reviews

Learner Information Sheet

About This Form
This form is for you to give your permission (consent) for us to use a computer tool (called AI) to help write down what is said in your EHCP (Education, Health and Care Plan) meeting.

What Does AI Do?
- We will use a safe tool called QuickAction.
- It records what people say in the meeting and turns it into writing.
- This helps us remember everything and write your EHCP clearly.
- No decisions are made by the computer – it just listens and writes things down.

How We Keep Your Information Safe
- Only people who help with your EHCP can see the recording or the writing.
- Everything is kept safe and locked (encrypted).
- The recording is deleted after your EHCP is finished.

Your Choices
You can choose if you want us to use this tool or not. You can also change your mind later.

Please Tick One Box
☐ Yes, I agree to the meeting being recorded and written down using the AI tool.

☐ No, I do not want the meeting to be recorded. Please take notes by hand instead.

Your Name: _____

Date of Meeting: _____

College Name: _____

Signature: _____

Date: _____

If you have any questions, you can speak to your teacher or the Principal (Mr O Flowers).