



---

## **Replenish Learning**

### **Safe Use of Artificial Intelligence (AI) Policy**

**Last Reviewed Date:** September 2026

**Review Date:** September 2027

#### **Statement of intent**

Replenish Learning recognises that artificial intelligence (AI), including generative AI, can be a useful tool when used safely, responsibly and with appropriate professional oversight. AI may support staff with administrative tasks, planning, resource development and reducing unnecessary workload, and may also be used in carefully considered ways to help pupils understand emerging technology and online safety.

Replenish Learning is a therapeutic, intervention-led alternative provision. AI will not replace professional judgement, safeguarding decision-making, direct work with pupils, or the individualised support provided by staff. Any AI-generated material used by the provision must be checked by a member of staff for accuracy, appropriateness, bias, safeguarding concerns and relevance before it is relied upon or shared.

For this policy, AI means computer systems capable of carrying out tasks that would normally require aspects of human intelligence. Generative AI refers to tools that can create new text, images, audio, video or other content in response to user instructions or prompts.

#### **1. Legal and guidance framework**

This policy has regard to relevant legislation and guidance, including:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Online Safety Act 2023
- DfE 'Keeping children safe in education'
- DfE guidance on generative artificial intelligence in education
- DfE digital and technology standards, including filtering and monitoring expectations

Where relevant, this policy should be read alongside Replenish Learning's Child Protection and Safeguarding Policy, Online Safety arrangements, Data Protection Policy, acceptable-use expectations and cyber-security procedures.

#### **2. Roles and responsibilities**

##### **Senior leadership**

- Ensure AI is used in a way that is appropriate to Replenish Learning's therapeutic and intervention-led model.
- Ensure staff receive appropriate guidance and training on safe and responsible AI use.
- Approve the use of AI tools where they may process provision information or be used as part of work with pupils.
- Ensure appropriate safeguarding, data protection, cyber-security, reliability and bias risks are considered before a new AI tool is introduced.
- Ensure AI practices are reviewed regularly and this policy is reviewed at least annually.

### **Designated Safeguarding Lead (DSL)**

The DSL will take the lead on safeguarding concerns connected with AI and online safety. The DSL will maintain awareness of risks including AI-generated harmful content, manipulated media and deepfakes, impersonation, bullying, exploitation and the creation or sharing of nudes or semi-nudes. Concerns will be managed in line with Replenish Learning's safeguarding procedures.

### **Data protection lead / DPO**

The person responsible for data protection will advise on the use of AI where personal information may be involved and will ensure that the provision's use of AI complies with applicable data protection requirements.

### **All staff**

- Use only AI tools that are appropriate for the task and follow any restrictions set by Replenish Learning.
- Never rely on AI output without checking it for accuracy, bias, appropriateness and safeguarding concerns.
- Maintain professional judgement and remain responsible for any document, resource or communication they produce with AI assistance.
- Protect pupil, family and staff information and avoid entering identifiable or special-category personal data into public AI tools unless the tool has been specifically approved for that purpose.
- Report any safeguarding, data protection, cyber-security or inappropriate-content concerns promptly.
- Model safe, responsible and appropriate use of technology when working with pupils.

### **Pupils**

- Use AI only when permitted and supported by staff.
- Follow staff instructions and the provision's expectations for safe technology use.
- Tell a member of staff if they see or receive anything upsetting, harmful, inappropriate or suspicious when using AI.
- Understand that work presented as their own should reflect their own contribution and abilities.

## **3. Data protection and cyber-security**

Replenish Learning recognises that generative AI can create data protection and cyber-security

risks. Personal data, safeguarding information, medical information, EHCP information, case notes, incident records, photographs, contact details or other identifiable information about pupils, families or staff must not be entered into public AI tools unless the tool has been formally approved for that type of processing and appropriate safeguards are in place.

Where AI is used for administrative purposes, staff should anonymise or pseudonymise information wherever possible. Initials, generic descriptions or other non-identifying information should be used where the identity of the individual is not necessary.

- Staff must remain alert to AI-assisted phishing, fraudulent messages and convincing fake content.
- AI-generated information must not be treated as authoritative simply because it appears confident or professional.
- Any suspected data breach or cyber-security incident involving AI must be reported immediately in accordance with the provision's existing procedures.
- AI tools that generate harmful, explicit or age-inappropriate content must not be made available to pupils.

#### **4. Intellectual property and copyright**

Replenish Learning will take reasonable steps to ensure that the use of generative AI respects copyright and intellectual property rights. Staff must not knowingly upload copyright-protected material, pupil work or staff-created material to an AI service where it may be retained, reused or used to train third-party models unless there is appropriate permission or another lawful basis. Staff must consider whether AI-generated material may reproduce or closely imitate protected material before it is published, distributed or used publicly. Where ownership or permitted use is unclear, advice should be sought before proceeding.

#### **5. Appropriate use of AI**

AI may be used to support appropriate activities within Replenish Learning, including:

- Reducing unnecessary administrative workload.
- Supporting the drafting of plans, policies, letters, reports and other administrative documents, subject to staff review.
- Generating ideas for therapeutic, intervention, life-skills, enrichment and engagement activities.
- Adapting the presentation or accessibility of resources to meet individual needs.
- Supporting age-appropriate discussion about emerging technology, online safety, misinformation and the limitations of AI.
- Helping staff identify possible resources or approaches, provided these are independently checked before use.

AI-generated resources or documents must be reviewed and, where necessary, amended by a member of staff before use. The member of staff using the output remains professionally responsible for the final content.

AI must not be used as the sole basis for decisions about safeguarding, behaviour, risk, pupil needs, referrals, attendance, suitability of provision, assessment of progress or any other decision that could significantly affect a pupil.

## **6. Misuse of AI**

Examples of unacceptable use include:

- Entering confidential, identifiable or sensitive information into an unapproved AI tool.
- Using AI to create, request or share harmful, abusive, discriminatory, sexual, exploitative or otherwise inappropriate material.
- Using AI to impersonate another person or create misleading images, audio or video.
- Presenting AI-generated work as a pupil's own independent work where this would misrepresent their abilities or progress.
- Using AI output without checking whether it is accurate and appropriate.
- Using AI in a way that breaches copyright, data protection, safeguarding or acceptable-use requirements.

Concerns about misuse will be considered in context. Safeguarding concerns will be referred to the DSL and managed under safeguarding procedures. Staff misuse may also be addressed through the relevant staff conduct or disciplinary procedures.

## **7. Pupil work, progress evidence and awards**

Replenish Learning does not deliver formal GCSE examinations. Where pupil work is used to evidence progress, contribute to portfolios, or support an award or accreditation such as the AQA Unit Award Scheme, staff must be satisfied that the evidence accurately reflects the pupil's own participation, understanding and achievement.

AI may be used as a supported resource where appropriate, but it must not be used in a way that falsely represents a pupil's independent ability or contribution. Any requirements set by an awarding organisation must be followed.

## **8. Safeguarding**

Generative AI can be used to create realistic but false or manipulated text, images, video and audio. This can increase risks relating to bullying, harassment, exploitation, impersonation, misinformation, sexual content and the creation or sharing of nudes or semi-nudes.

- Pupils will be supported to understand that AI-generated content may be false, misleading or manipulated.
- Pupils will be encouraged to speak to a trusted member of staff if AI content makes them uncomfortable, worried or unsafe.
- Staff will respond to AI-related safeguarding concerns in the same way as other safeguarding concerns and will report them to the DSL without delay.
- Filtering and monitoring arrangements will be used, where applicable, to reduce access to unsuitable or harmful online content.
- Staff will receive appropriate online-safety and safeguarding updates that include emerging AI-related risks.

## **9. Supporting pupils to use AI safely**

Where appropriate to a pupil's age, needs and level of understanding, Replenish Learning will use accessible, practical and individualised approaches to help pupils understand AI. This may form part of PSHE, online-safety work, life-skills activities or wider therapeutic and intervention work rather than a formal computing curriculum.

- AI can make mistakes and may provide inaccurate or outdated information.
- AI-generated content can contain bias or misleading information.
- Images, videos and voices can be manipulated or generated artificially.
- Personal and private information should not be shared with AI tools without appropriate permission and safeguards.
- Information produced by AI should be checked against reliable sources.
- AI should be used as a tool to support thinking and creativity rather than replacing a pupil's own participation and ideas.
- Pupils should seek help from a trusted adult if they are unsure about something they encounter online.

## **10. Monitoring and review**

Senior leadership will monitor the implementation of this policy and review it at least annually. An earlier review will take place where there is a significant change to legislation or guidance, the provision introduces a new AI system, or an AI-related safeguarding, data protection or cyber-security incident identifies a need for change.

Changes to this policy will be communicated to relevant staff and, where appropriate, pupils and parents/carers.