Academies Trust

Artificial Intelligence (AI) Policy and Strategy

- Date created: April 2025
- Date approved by Trust Board: July 2025
- Applicable from: April 2025
- Next review: July 2026
- Policy owner: Deputy Chief Executive Officer

Contents

1. Introduction

1.1. Artificial Intelligence (AI) technology is already widely used in both commercial and everyday applications, and its influence is anticipated to grow exponentially, impacting almost all industries and job sectors including education. Some definitions:

1.1.1. Generative AI refers to technology that can be used to create new content based on large volumes of data that models have been trained on from a variety of works and other sources. Often these take the form of language learning models (as they reflect back summaries of huge data sets without truly 'understanding' them). Some popular generative AI platforms are Gemini AI and ChatGPT.

1.1.2. AI integration in apps/platforms. AI has been used for many years to automatically adapt content for pupils, with examples such as Hegarty Maths, MyMaths or LBQs. Others are more recent and may use aspects of AI, such as Canva as a creative tool.

1.2. AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. This policy establishes guidelines for the responsible and effective use of AI within our academies.

1.3. By embracing AI technology, we aim to augment the student experience by:

1.3.1. Enhancing educational experiences for students / pupils

1.3.2. Educating staff and pupils about safe, responsible and ethical AI use

1.3.3. Incorporating AI as a teaching and learning tool to develop staff and pupils' AI literacy and skills

1.3.4. Prepare staff and students / pupils for a future in which AI technology will be an integral part

1.3.5. Improve and streamline school operations to minimise cost and maximise efficiency.

1.4. The intended positive impact of any AI platform will be at least one of the following aims:

- Student outcomes
- Student experience
- Improved student accessibility to learning
- Improved staff accessibility to role
- Staff administration efficiencies
- Staff development
- Enhanced analytics of data or trends

1.5. All users of AI will comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts their safety or privacy at risk. Staff will not allow or cause intellectual property, including students' / pupils' work, to be used to train Generative AI models without appropriate consent or exemption to copyright.

1.6. We recognise that the technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. We recognise the leadership in the education sector provided by the Department of Education and the guidance set out in their Statement on Generative Artificial Intelligence in Education. This AI policy has been informed by that guidance. As guidance and technology changes the policy therefore will need to remain under regular review. This policy will therefore be reviewed annually.

1.7. We will be transparent and accountable about the use of AI technology so that stakeholders, including staff, students / pupils, parents and other partners understand where and how AI is used and who is responsible. Any stakeholder feedback or questions about the use of AI will be considered and responded to appropriately.

1.8. By adhering to this policy, we aim to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all involved.

2. Scope and Responsibilities

2.1. This Policy applies to all staff, including temporary staff, consultants, community council members, trustees, volunteers, and contractors, and anyone else working on our behalf. It is also applicable to pupils, but this group will require support and guidance from staff as part of their learning.

2.2. All staff are responsible for reading and understanding this policy before using any AI technology.

2.3. All leaders are responsible for ensuring their staff team read and understand this policy before using AI technology and that they follow this policy, including reporting any suspected breaches of it.

2.4. All users of AI will comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts their safety or privacy at risk. Staff will not allow or cause intellectual property, including pupils' work, to be used to train Generative AI models without appropriate consent or exemption to copyright.

2.5. There are a number of staff in the school who are key contributors to AI policy and development:

2.5.1. The Trust Data Protection Officer is responsible for advising on data protection obligations in relation to AI use.

2.5.2. The Trust IT team will provide technical support and guidance on the operation of AI.

2.5.3. The Trust Board, or one of its delegated subcommittees, is responsible for the approval of this policy.

2.6. This policy also links, but does not override (ie other policies take precedent), other school policies, including (but not limited to):

- Child Protection and Safeguarding
- Data Protection
- Acceptable Usage
- Local Curriculum, Homework, Feedback and Marking Policies
- Colleague Code of Conduct

and should be read in conjunction with them. Given the wide scope of AI currently, and predicted future, this policy acknowledges that all policies in the Trust could be affected by the use of AI and any aspect

3. Use of AI for Teaching purposes

3.1. There are some uses of Generative AI for which the Trust recognises as acceptable:

3.1.1. Producing (or assisting in the production of) bespoke learning resources. For example:

- Producing fictitious datasets for analysis in a statistics lesson
- Producing lyrics or prose for analysis in an English lesson
- Producing sample text for student analysis in a History lesson

- Generating images to analyse or use in an Art lesson
- Generating a music composition to demonstrate a style in a Music lesson
- Creating text for age-related goal in a literacy lesson (eg "poem about a forest with reading age of 7")
- Creating text for EAL learners that bridges a native language to English as they work on becoming fluent readers

3.1.2. Performance Analytics - gathering relevant information and identifying patterns in pupil attainment at an aggregated input cohort level, but teachers should rely on their expertise to provide a comprehensive and holistic evaluation of each individual pupil's progress - they remain the key decision-maker in evaluating and providing feedback on pupils' academic achievements and overall development. Note the importance of aggregate cohort level data, individuals cannot be identified within any data set. Inputting identifiable information about a child is a breach of GDPR.

3.2. Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws.

3.3. There are some areas which the Trust does NOT recognise Generative AI as a tool to aid in:

3.3.1. Planning lessons - *this is a key part of the teacher's role in adapting resources to match the needs of students and outsourcing this cognitive exercise is not acceptable. Much of the AI language models use out of date theory and pedagogical approaches and they are not consistent with what we endorse.*

3.3.2. Writing reports on individual children - *every child deserves a bespoke, considered, report that a professional has spent time considering the wording of.*

3.3.3. Providing assessment and feedback to students - *this is a critical part of a teacher's role in planning future lessons and understanding pupil progress, it is NOT considered an admin task.*

3.4. Staff are reminded that ChatGPT and other general AIs have their data stored in the public domain. Inputting identifiable data about a child is a breach of GDPR.

3.5. It is recognised that many organisations and groups tailor their products and messages towards using generative AI to save teacher workload and in doing so package the argument as a benefit to mental health and general staff well-being. However the Trust maintains a position that the use of AI in the scenarios given in s3.3 would both deskill professionals and give rise to a very likely point of generative AI creating poor quality lessons and experiences that go against the desires of leadership. For example a teacher creating a lesson plan from ChaptGPT would involve the AI trawling online content and assuming that many outdated practices are relevant now because that content exists online and generate lesson plans using this erroneous information.

4. Use of AI for Non-Teaching purposes

4.1. There are some uses of Generative AI for which the Trust recognises as potentially acceptable (subject to the appropriate due diligence and risk assessments):

- Generating meeting notes (or clerking services) ready for checking by minute taker, where a platform does not contravene s9.2. Refer s4.3
- Carrying out calculations/reconciliations
- Coding for reporting platforms (eg back-end of dashboards)

4.2. Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws.

4.3. AI notetakers will never be used in a meeting without completing a prior Data Protection Impact Assessment and making all participants aware before the meeting starts. If a

participant objects to the use of an AI notetaking app, the meeting organiser will take into account the nature of their objection and if their concerns cannot be overcome, the organiser will consider whether it is proportionate to continue the meeting without the use of AI. Although it is difficult to control the actions of external attendees at meetings, our staff will let attendees know upfront that they should not use AI notetakers and as the meeting organiser our staff will take responsibility for the taking and distribution of notes.

4.4. However, there have been some examples where generic AI has been seen to be used inappropriately leading to poor quality of content, incorrect information and/or generally inappropriately worded guidance:

- A bid written for a business case to purchase hardware devices for a school with poor technical specifications (*reminder: Generative AI does not 'know' what it is stating - it runs a language model to best predict the next words in context based on a vast data trawl of the internet*)
- A letter to parents about an upcoming event using overly complex, slightly misleading and/or technical language
- Letters of application for a job - statements written by AI that have exaggerated statements of achievement

5. Use of AI by Pupils

5.1. As part of child protection and safeguarding policies and processes, Trust schools will ensure that pupils will continue to be protected from harmful content online, including that which may be produced by AI technology and that any AI tools used are assessed for appropriateness for individual pupils' age and educational needs. We will ensure that staff are aware of the risks of AI which may be used to generate harmful content including deepfake and impersonation materials.

5.2. A culture of responsible AI use will be fostered through engaging pupils in conversations about data privacy, bias, safeguarding, and the social impact of AI applications.

5.3. Pupils will be taught not to enter personal, sensitive or confidential data into Generative AI tools [including their email addresses].

5.4. AI education will be sensitively incorporated into the curriculum to provide pupils with an understanding of AI's capabilities, limitations, and ethical implications. Guidance will be provided on identifying reliable and trustworthy AI sources and evaluating the credibility and accuracy of AI-generated information.

5.5. AI tools and technologies may be integrated into teaching and learning activities across various subjects and year groups, providing pupils with hands-on experience and opportunities to develop AI literacy and skills.

6. Potential Misuse of AI

6.1. Where there is identified use of AI by staff, the conduct (and its impact) will be considered through the disciplinary policy.

6.2. Pupils will receive education on responsible and ethical AI use, including the potential risks and consequences of relying solely on AI tools to complete assignments, coursework, or homework. Pupils will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.

6.3. Teaching staff will emphasise the importance of critical thinking, creativity, and originality in pupil work, discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations will be communicated to pupils regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.

6.4. Key messages are delivered and re-emphasised in all subjects where pupils are completing work for external grading.

6.5. Academies will follow and adhere to any rules or guidance on the use of AI in assessments given by the Joint Council for Qualifications or individual Exam Board requirements [refer https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/ and https://www.jcq.org.uk/exams-office/blogs/updating-the-jcq-guidance-on-ai-use-in-assessments/ for further information]

6.6. Teaching staff will employ various assessment methods to evaluate pupil understanding and ensure that they have genuinely grasped the subject matter. This may include class discussions, oral presentations, practical demonstrations, written reflections, and project-based assessments. By utilising diverse assessment strategies, teaching staff can verify pupils' comprehension beyond what AI tools can assess, promoting deep learning and authentic pupil engagement.

6.7. Teaching staff will educate pupils on the potential misuse of AI by those seeking to deceive or trick pupils into actions that they would otherwise not contemplate, for example interaction with others who are not who they claim to be but who can imitate who they claim to be using AI technology.

7. Accountability and Responsibility

7.1. The Trust holds overall responsibility for overseeing and assessing the use of AI within the organisation. All staff must adhere to the principles and guidelines set out in this policy.

Trust approval must be sought for any uses of AI which involve personal (information that can identify an individual such as their name, initials, email address, contributions in meetings/opinions etc) or commercially sensitive information.

Responsibility	Role(s) Accountable
This AI policy and any associated guidance within, or associated, to it	Deputy Chief Executive Officer Head of IT
Responsible for the review and approval of AI tools that involve personal or commercially sensitive information	Data Protection Officer Central IT Team
Responsible for advising Academy and Trust staff when and which AI tools are approved and ready for use	Data Protection Officer Central IT Team
Responsible for monitoring and reviewing the usage of AI tools	Central IT Team

8. Ethical Use of AI

8.1. Flaws in the platforms

8.1.1. The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Staff should be mindful of, and instruct pupils about, the following considerations:

8.1.1.1. Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be

discriminatory based on factors such as race, gender, or socioeconomic background. The data source of the AI will be reflected in its answers.

8.1.1.2. Accuracy – information may be inaccurate when generated so any content should be fact-checked.

8.2. Recruitment

8.2.1. As the use of language models has become more prevalent in creating prose, so has arisen the scenario of applicants for jobs using AI to automatically generate letters of application and sections of the application form that require written communication. Recruiters should be vigilant against such practices and some indicators to look for are contained in the appendices to this policy.

8.3. Environmental issues –AI requires energy to run. Therefore, it will only be used when relevant, appropriate and proportionate, where it is the most suitable and sustainable option.

8.4. Inferring Emotion - The European Union's Artificial Intelligence Act (AI Act) imposes strict regulations on the use of emotion recognition systems (ERS) within workplaces and educational institutions. These systems, defined as AI tools designed to identify or infer emotions or intentions of individuals based on their biometric data, are generally prohibited in these settings. Although the Act does not apply in the UK, this type of AI will not be used in Co-op Academies Trust.

9. Data Protection implications of using AI

9.1. Staff and pupils should be aware that any information entered into a Generative AI model is no longer private or secure.

9.2. Staff and pupils must not enter any personal information (personal data, intellectual property or private information (including sensitive information, such as contracts) into any Generative AI model. Staff should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

9.3. Staff who wish to utilise AI tools must follow the approval process set out in Section 12 to ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required, following the Trust's Data Protection Policy and Data Protection Impact Assessment Process/Procedures.

9.4. When signing up to use specific Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out.

9.5. Any DPIA or assessment of the data protection aspects of the use of AI will include:

9.5.1. The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.

9.5.2. What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.

9.5.3. A clear indication where AI processing and automated decisions may produce effects on individuals.

9.5.4. Consideration of both individual and allocative harms (for example, where the harm results from a decision to not permit a pupil to take a certain subject at GCSE or A Level) and representational harms (for example, selecting groups of pupils for different interventions results in gender or racial bias).

9.5.5. How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.

9.5.6. An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
9.5.7. If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy in order to justify the use of the AI tool in the DPIA.
9.5.8. If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
9.5.9. Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
9.5.10. The potential impact of any security threats.
9.5.11. A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them.
9.5.12. Whether processing is intentionally or inadvertently processing special category data- there are many contexts in which non-special category data is processed, but infers special category data (for example, a postcode could infer ethnicity).
9.5.13. A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

10. Cyber security

10.1. The Central Trust team and individual academies will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:
10.1.1. Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
10.1.2. Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
10.1.3. Ensuring that any suspected or confirmed security incidents are reported to the Central IT Team and the Data Protection Officer.
10.1.4. Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.
10.1.5. Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't, often used to spread misinformation or impersonate someone to commit a crime).
10.1.6. Training staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

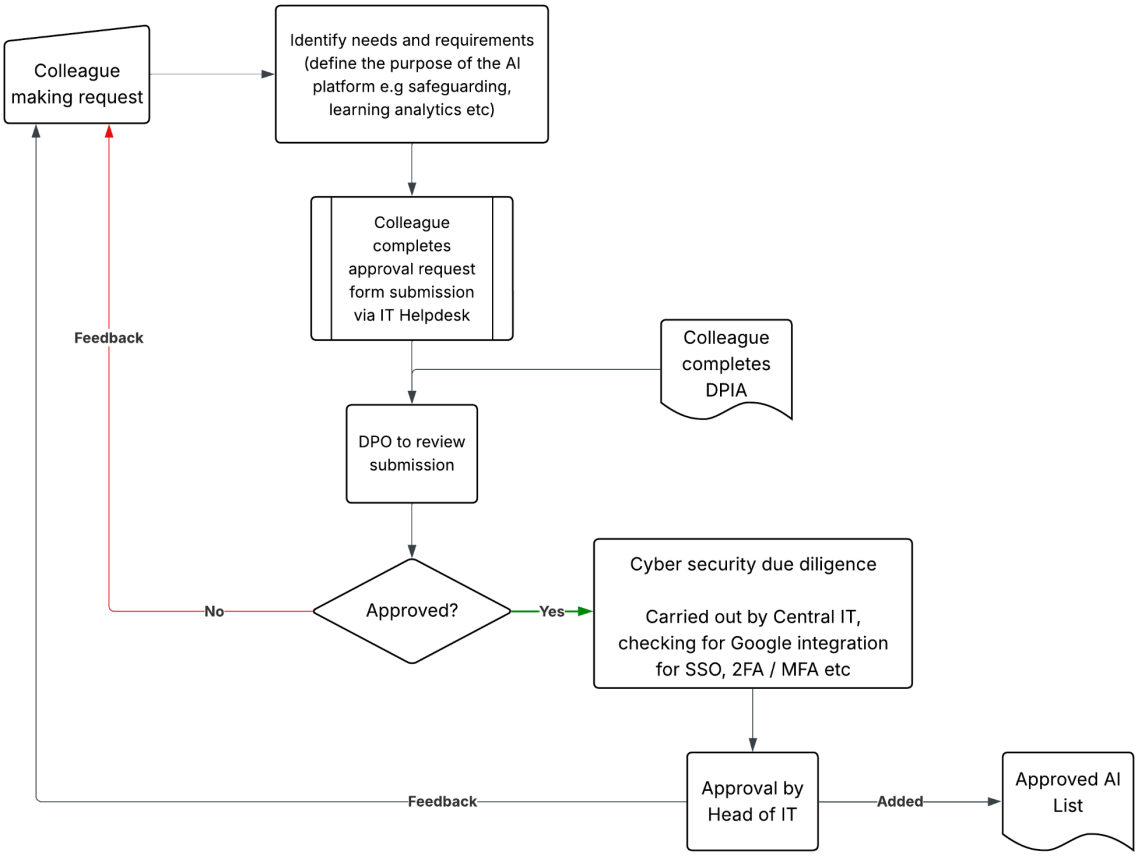
11. Approved listing of AI platforms

11.1. The following list provides an overview of the Trust approved platforms that utilise AI:

Approved AI platforms

12. Procurement and requisition of specific AI platforms

12.1. In order for a platform to be added to the approved AI platforms list, the following process will be followed before sign off by Head of IT (or as delegated):


Colleague making request
Identify needs and requirements (define the purpose of the AI platform e.g safeguarding, learning analytics etc)
Colleague completes approval request form submission via IT Helpdesk
Colleague completes DPIA
DPO to review submission
Approved?
No
Yes
Feedback
Cyber security due diligence
Carried out by Central IT, checking for Google integration for SSO, 2FA / MFA etc
Approval by Head of IT
Feedback
Added
Approved AI List

Appendix A: Intended use of product or application utilising AI

Name of application or platform			
Name of lead/owner	Person		
Date of assessment	Date	Date of future review	Date
Context and Background		Intended Impact *(tick all that apply)*	
		☐ Student outcomes ☐ Student experience ☐ Improved student accessibility to learning ☐ Improved staff accessibility to role ☐ Staff administration efficiencies ☐ Staff development ☐ Enhanced analytics of data or trends	
Scope *Where will the platform be used, in what settings/academies*		Platform beneficiaries *Who will benefit from the platform, including any particular target pupil cohort groups.*	

Authorisation

Role	Person	Signature	Date
Lead/Owner	Person		Date
DPO	Person		Date
Head of IT	Person		Date

Appendix B: Spotting the use of AI in an application

Overly polished language

AI tools tend to produce content that is grammatically impeccable but may lack a 'human touch'.

Signs include:

- A flawless yet monotonous tone: The application form might read as too perfect, lacking personal anecdotes or a unique voice.
- Uniformity in phrasing: AI might use repetitive phrases or a uniform writing style throughout different sections. For example, an application form filled with immaculate bullet points like "Managed comprehensive integration strategies" without any variation or personal flair might be a red flag.
- The use of overly long or complex sentences that include patterns or phrases that language model AI commonly employs such as 'embarked, delved, invaluable, relentless, groundbreaking'.

Unusually Generic Descriptions

AI can generate generic descriptions that might not fit the specific job or industry context. Look for vague accomplishments without quantifiable results or context. Real professionals often use specific terms related to their field that AI might overlook or generalise.

Mismatch of skills and experience

The skills listed on the employee's application form might not align logically with the candidate's experience or job history. For example, an application form that lists advanced skills in software not commonly used in a candidate's industry or experience level could suggest AI-generated content.

Absence of personal anecdotes

Look for application forms that lack specifics about past projects, challenges, or personal achievements. Descriptions might be too broad or lack customisation to the individual's actual experience.

For example, a cover letter or application form that doesn't mention the specific projects, or role details, and instead uses placeholder-like statements.

Appendix C: Definitions

Algorithm is a rule given to an AI machine to perform a task.

Artificial Intelligence (AI) is an umbrella term for a range of algorithm-based technologies and approaches that often attempt to mimic human thought to solve complex tasks, these may include, visual perception, speech recognition, decision making, and translation between languages.

Generative AI is a form of AI, which produces new content, such as images, text or computer code. It works by using large quantities of data, often harvested from the internet, to train a model in the underlying patterns and structures of that data. After many rounds of training the model is capable of generating new content. When a user provides a prompt or input, the AI evaluates the likelihood of various possible responses based on what it has learned from its training data. It then selects and presents the response that has the highest probability of being the right fit for the given prompt. That prompt and response then may be fed back into the model to provide further training.

Guardrails are restrictions and rules placed on AI systems to ensure they handle data properly and ethically.

Hallucination is when AI presents information as fact when it is not actual fact.

Large Language Model (LLM) is a huge database of language knowledge that can write articles, answer questions or create realistic dialogue and is pre-trained on large amounts of data.

Natural Language Processing (NLP) understands written and spoken language e.g. translations.