Trust in Learning
Trust in Success

TRUST IN LEARNING (ACADEMIES)

Artificial Intelligence (AI) Policy

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As part of the review process, this policy/procedure has been subject to an Equality Impact Assessment.		

History of Policy Changes:

Date	Page	Change	Reason for Change
December 2025		New policy	New over-arching policy for the Trust

Contents

1. Statement of Intent - 4 -

2. Values and Principles - 4 -

3. Objectives and Scope - 5 -

3.1 Objectives - 5 -
3.2 Scope - 5 -

4. Responsibilities and Accountabilities - 6 -

4.1 Responsibilities of the Trust Central Team - 6 -
4.2 Responsibilities of the Headteacher - 6 -
4.3 Responsibilities of school leadership - 7 -
4.4 Responsibilities of all staff - 7 -
4.5 Responsibilities of parents - 7 -
4.6 Responsibilities of pupils - 7 -
4.7 Data Protection Officer (DPO) - 7 -
4.8 Designated Safeguarding Lead (DSL) - 7 -
4.9 IT Shared Services Team - 8 -

5. Understanding AI - 8 -

6. Use of AI by Staff - 8 -

6.1 Staff regulations - 9 -
6.2 AI in the classroom - 10 -

7. Digital Literacy and Use of AI (Pupils) - 11 -

8. Data Protection Implications of Using AI - 12 -

9. Cyber Security - 12 -

10. AI Tools - 12 -

11. Safeguarding - 13 -

12. Environmental Considerations - 14 -

13. AI Policy – Annex - 14 -

1. Statement of Intent

This document sets out the policy for Artificial Intelligence (AI) use within Trust in Learning Academies (the Trust). All schools and central Trust teams in the Trust are committed to using AI safely, effectively, and ethically for both staff and pupils. The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

The policy has been developed and implemented in consultation with the Trust's IT function and in reference to the DFE's Generative Artificial Intelligence (AI) in Education Policy Paper, and the DfE's Generative AI Product Safety Expectations. The Trust recognises the immense potential of AI, including generative AI and large language models (LLMs) to enhance school and Trust leadership, teaching, learning, and administrative processes, but recognise the importance of ensuring the safety of staff and pupils. We recognise that technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. We have therefore taken an approach as an educational institution as 'safeguarding first' to prepare children for their future lives in an AI world.

2. Values and Principles

This Trust Policy is set out with the following principles at its core:

- **Safeguarding**: Every school and Trust team within the Trust prioritises the safety of all children and staff. This includes how AI is used to maintain the safety and wellbeing of all.
- **Transparency**: We aim to be clear and open about decisions and expectations, including about the purpose, function, and decision-making processes of AI technology within the Trust.
- **Inclusivity**: We believe all children and staff deserve equal access to learning opportunities, regardless of background, ability, or circumstance. AI will be designed and used to support inclusive education practices and prevent bias in teaching, assessment, and support systems.
- **Privacy**: All personal information will be handled with care, respecting the privacy rights of all individuals. Our approach to AI will comply with data protection laws and ethical standards, ensuring secure, lawful and responsible use of student and staff data.

Trust in Learning Academies is a family of schools each with a distinctive identity, collaborating to strengthen and support each other. We deliver high quality education with evidence-informed approaches to teaching, learning and the curriculum. Inclusion is at the heart of all we do. We actively listen to the voices of our pupils, staff and communities. Every school makes deliberate choices to be sustainable and globally focused.

The Trust vision is to:

- Inspire pupils to trust in learning and achieve their full potential
- To empower pupils to have confidence in their successes to make a positive contribution to the world
- To remove barriers to learning and help transform the lives of our pupils

Any data collected, stored or managed as a result of this policy is in accordance with UK and any relevant retained or assimilated EU law, and in line with the Trust's ethos and values.

This Policy has been framed in accordance with the guidance on best practice from the Department for Education (DfE).

3. Objectives and Scope

3.1 Objectives

The specific aims of this policy are to:

- Provide guidance and establish a responsible and consistent approach to AI across our Trust, focussing on its safe, responsible, ethical, legal and appropriate use.
- Ensure all staff understand their duties and responsibilities when using AI.
- Ensure all pupils understand their duties and responsibilities when using AI.
- Promote transparency and accountability in AI implementation.
- Safeguard the wellbeing and rights of all pupils and staff, including protection from AI generated harmful content.
- Explore the potential of AI to reduce workload and enhance leadership, teaching, and learning.
- Prepare pupils for a future with AI, whilst maintaining academic integrity.

All staff, including school and Trust leaders, are responsible for reading and understanding this policy before using any AI technology. Staff must report any suspected breaches of this policy to the DPO.

3.2 Scope

This policy applies to:

- Pupil use of AI tools
- Staff use of AI tools (for professional purposes)
- The use and configuration of all AI tools that have either been provided by the Trust as part of general IT tools available (such as Microsoft 365 Copilot), and tools procured by the Trust for a specific use.

This policy has due regard to legislation and statutory guidance, including but not limited to, the following:

- DfE (2023): Data protection in schools - Generative artificial intelligence (AI) and data protection in schools - Guidance - GOV.UK
- DfE (2024): Ofsted's approach to artificial intelligence (AI) - GOV.UK
- DfE (2025): Generative artificial intelligence (AI) in education - GOV.UK
- DfE (2025): Generative AI: product safety expectations - GOV.UK
- DfE (2025): Keeping Children Safe in Education 2025 (KCSIE)
- DfE (2025): Using AI in education settings: support materials - GOV.UK
- Education Act (2002): Education Act 2002
- Equality Act (2010): Equality Act 2010
- GOV.UK (2021): AI Roadmap - GOV.UK
- GOV.UK (2021): National AI Strategy - GOV.UK
- Information Commissioner's Office (ICO) (2023): Guidance on AI and data protection | ICO
- Joint Council for Qualifications (2025): JCQ_AI Use in Assessments: Your role in protecting the integrity of qualifications

- MIT (2025): Explained: Generative AI's environmental impact | MIT News | Massachusetts Institute of Technology.
- Ofcom (2024): Online Nation 2024 report
- UKCIS (2024): Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

This policy will be implemented in conjunction with the following Trust policies:

- Online Safety Policy
- Safeguarding and Child Protection Policy
- Data Protection Policy
- Teaching and Learning Policy
- Assessment Policy
- Acceptable Use Policies (Staff and Pupils)
- IT Security Policy
- Behaviour Policy
- SEND and Inclusion Policy
- Homework Policy
- Staff Discipline Policies and Codes of Conduct
- Anti-bullying Policy
- Curriculum Policies

4. Responsibilities and Accountabilities

4.1 Responsibilities of the Trust Central Team

- Ensure that the policy, as written, does not discriminate on any grounds, including, but not limited to, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- Ensure the policy is well communicated to all Headteachers.
- Ensure that the policy is regularly reviewed.
- Ensure that the schools and central functions are aware of this policy and know how to be equipped to operate within it.
- Discuss and investigate new AI tools or applications, based on advice from the DPO
- Sign off and review new AI tools or applications, based on advice from the DPO, following discussions with IT Shared Services Team.

4.2 Responsibilities of the Headteacher

- Ensure the implementation of and compliance with current policy and procedures at school level
- Monitor systems, resources, impact and actions related to the policy.
- Ensure the policy is well communicated and staff understand their role in its implementation.
- Handle any complaints at school level which arise through this policy.
- Ensure school AI use complies with UK GDPR and other legal requirements by liaising with the Data Protection Officer (DPO).

- Monitor the effectiveness of AI use and gather feedback from staff, pupils, and parents to inform future decisions.

4.3 Responsibilities of school leadership

- Ensure staff are inducted into the procedures surrounding this policy and any updates.
- Provide training to ensure policy compliance.
- Hold sessions for parents and pupils as required, to ensure the policy is understood.
- Report any suspected data protection breaches through AI to the DPO.
- Undertake strategic planning of how AI will be used in the school.

4.4 Responsibilities of all staff

- Uphold the whole school and Trust approach to the policy through modelling expected standards and utilising appropriate procedures.
- Keep up to date with policy changes over time.
- Promote a collaborative and inclusive ethos where all pupils can thrive.
- Feedback to school and Trust leaders where concerns may arise in the implementation of the policy.
- Consider the appropriate use of AI technology in their professional role.
- Exercise professional oversight and critical evaluation on all AI outcomes (text, images, videos etc).

4.5 Responsibilities of parents

- Support the implementation of the policy with their child, as appropriate.
- Where a parent has feedback on the implementation of the policy, to raise this directly with the school while continuing to work in partnership with the school.
- Encourage their child to use AI tools responsibly both at home and at school.
- Provide consent (if required) for your child's data to be used within AI systems.
- Provide consent for your child to use AI at school, where appropriate.

4.6 Responsibilities of pupils

- Uphold school rules and expectations and thereby comply with the implementation of the policy.
- Feedback on the implementation of the policy through appropriate means, such as school council, to school staff.
- Report any concerns with AI to an appropriate member of staff.
- Respect intellectual property and academic integrity rules.

4.7 Data Protection Officer (DPO)

- Conduct Data Protection Impact Assessments for AI tools.
- Advise on data protection obligations in relation to AI use.
- Ensure UK GDPR compliance of the Trust's AI use.

4.8 Designated Safeguarding Lead (DSL)

- Monitor AI related safeguarding risks.

- Respond to AI related safeguarding concerns.
- Train staff on AI safeguarding considerations.

4.9 IT Shared Services Team

- Provide technical support and guidance on the operation of AI.
- Monitor AI use periodically from both staff and pupils and escalate any misuse appropriately.
- Discuss and investigate new AI tools or applications, based on advice from the DPO.

5. Understanding AI

Artificial Intelligence (AI) refers to computer systems or software that are designed to perform tasks such as understanding language, recognising patterns, and solving problems. Some common AI use includes email spam filters, autocorrect and predictive text on mobile phones, voice assistants, online shopping recommendations and social media feeds. However, a more commonly known type of artificial intelligence is Generative AI, which can create new content, such as text, images, audio, video or code, based on patterns it has learned from existing data. Unlike traditional AI systems that classify or predict, generative AI produces original outputs that resemble human created work. Generative AI is rapidly evolving, and its availability is increasing. Whilst this offers opportunities for our staff and pupils, it can also increase risk.

Important AI limitations to consider:

- AI systems can produce hallucinations (inaccurate information that it thinks is true)
- AI output may contain bias (it may favour inaccurate stereotypes)
- AI predicts responses based on patterns, it does not have thinking or reasoning capabilities like a human
- AI models only collate data prior to a certain date and so some content may not reflect the most recent information.

Throughout the policy, the term 'AI' will be used to depict Generative AI. The Trust understands both the opportunities and limitations of AI, but safeguarding of staff and pupils is integral to the Trust's approach. Therefore, we have outlined tools that are recommended for both staff and pupils to use. For those recommended tools, a Data Protection Impact Assessment will have been carried out to support our data protection approach.

Other AI tools are not recommended for use, especially for pupils.

This approach applies when using both Trust owned devices and any personal devices which may be used for work purposes. The use of AI agents (a system or programme that can be autonomously perform tasks on behalf of a user or system) is currently being investigated and thus is not authorised for use at school level.

6. Use of AI by Staff

The school recognises the value that AI brings to the education sector and are dedicated to remaining at the forefront of developments. We are committed to empowering staff and equipping them with tools they need to thrive, succeed, and find efficiencies. We expect staff to use AI to augment **not** replace professional

judgment. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable. When used appropriately, AI has the potential (not limited) to:

- Reduce administrative workload
  - Some examples include:
    - Summarising business documents
    - Communication tasks
- Enhance teaching and learning
  - Some examples include:
    - Curriculum mapping
    - Individual student resources
- Personalise learning support
  - An example is:
    - Adapting content for different abilities and needs
- Free-up teacher / leader time
  - Some examples include:
    - Allowing focus on direct teaching and pupil interaction
    - Lesson planning
    - Assessment planning
- Supporting equality and diversity within the Trust and schools
  - An example is:
    - Translating newsletters for EAL parents
    - Reducing lengthy written texts, e.g. policies, into more accessible for staff with dyslexia

There is no expectation that staff will use AI for any of the above activities. It is a tool that they **can** use at their discretion and is not part of their required duties.

Where staff use AI as part of their work, they will be clear about where it has been used and what additional professional review or revision has been carried out. The school reserves the right to request AI is not used for certain tasks. AI-related risks and safeguards will be integrated into annual safeguarding training, aligning with statutory guidance.

6.1 Staff regulations

It is important that staff understand how to keep themselves and others safe when using AI, and what AI appropriate use includes. Therefore, staff will:

- Comply with applicable laws, regulations, policies and guidelines (regarding intellectual property, copyright, data protection etc) when using AI.
- Prioritise the safeguarding of pupils and their online safety and will not knowingly use any AI technology that puts their safety or privacy risk.

- Use AI tools responsibly, ensuring they complement staff professional judgment. It is good practice to consider AI as creating the 'first draft', but never the 'final version'.
- Review and tailor any AI output and assess its suitability.
- Remain professionally responsible and accountable for the quality and content of any output generated by AI.
- Be aware of the risk of over-reliance and de-skilling when using AI at work.
- Make informed decisions about when AI use is appropriate and when it is not.
- Understand the risk AI poses to both data protection and the potential to generate harmful content including deepfake and impersonation materials.
- Be aware of the environmental impact AI has on the natural world.
- Consider digital poverty and children's ability to access AI tools when setting any homework activities that may involve AI tools.

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.
- Use AI to replace strategic decision making or use it to make decisions that could have a significant impact on people.
- Input any personal or sensitive data into an AI tool. This includes pupil details and any identifiable information.

Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this, will be subject to disciplinary action as defined in the Staff Disciplinary Policy.

6.2 AI in the classroom

When used appropriately and effectively, AI use in the classroom can be extremely beneficial for both staff and pupils. AI will be used in the curriculum to support learning, help teachers, and prepare pupils for a future where technology plays a big role. In **primary schools**, this might include simple activities to help children understand what AI is, such as stories, games, or using tools like Microsoft 365 Copilot to help with writing or research—with adult guidance. In **secondary schools**, AI might, for example, be used in subjects like computing (to help write code), history (to explore sources), or science and maths (to work with data). In all schools, AI will be used to support good teaching, not replace it. Teachers will make sure AI use fits with the curriculum, includes all learners, and helps pupils think about the wider impact of AI on society and the environment.

AI can also have an impact on assessments and homework. Thus, for assessments, staff will:

- Comply with the Joint Council for Qualifications guidance
- Understand the school's procedures for preventing AI malpractice
- Educate students about appropriate AI use in assessments
- Detect and respond appropriately to suspected AI misuse

For homework and independent study, staff will:

- Provide guidance to pupils about when AI use is permitted
- Focus on tasks that promote genuine learning rather than AI completion

- Exercise professional judgement over student's work if AI content is suspected (e.g. if there are sudden quality changes, unusual style, or content)

7. Digital Literacy and Use of AI (Pupils)

As part of the school's duty to protect and safeguard pupils, the school and Trust will endeavour to protect children from harmful online content, including that which may be produced by AI technology. All AI use will align with age restrictions and educational needs and will be approved by the child's parent/carer and the Trust's IT function.

- Pupils will be permitted to explore and experiment with authorised, age-appropriate AI-based tools, when deemed appropriate by a member of staff, following written consent from the child's parent/carer.
- A culture of responsible AI use will be fostered through engaging pupils in conversations about data protection, privacy, bias, safeguarding, and the social impact of AI applications. Education staff may use AI demonstrations to support this.
- 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.
- Pupils will be made aware of the potential risks and consequences of using AI unethically, such as to complete assignments, coursework, homework, or manipulating images.
- Pupils will be taught not to enter personal, sensitive, or confidential data into AI tools both at school and at home, where age appropriate.
- Pupils will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI and will be supported to understand the ethical implications of this.
- To prepare children for their future lives in a world where AI is prevalent, pupils should be educated about appropriate use, benefits and risks of AI. Students do not necessarily need direct access to AI for these purposes.
- User age restrictions vary between models and must be adhered to. Most are age 18+, some 16+ or 16+.
    - Common AI tools:

AI tool	Age restriction
Microsoft Copilot[1]	13 years old
ChatGPT[2]	13 years old
Google Gemini[3]	13 years old (under 13s with parental supervision)

- Written parental consent is required for children aged over the minimum age restriction for the AI model, but under 18 years of age to use the AI tools in school.

[1] Microsoft. (no date) *Microsoft Copilot age limits and parental controls, Microsoft Support.* Available at: https://support.microsoft.com/en-gb/topic/microsoft-copilot-age-limits-and-parental-controls-f79b47a6-288a-4513-8c01-afe4d16db900
[2] OpenAI. (no date) *Is ChatGPT safe for all ages?, OpenAI.* Available at: https://help.openai.com/en/articles/8313401-is-chatgpt-safe-for-all-ages
[3] Gemini. (no date) *Guide your child's Gemini Apps Experience, Gemini Apps Help.* Available at: https://support.google.com/gemini/answer/16109150?hl=en-GB&sjid=14531562056635106671-EU

- Pupils will be actively taught about safe and unsafe AI use through the Digital Literacy curriculum, where age appropriate. The school will inform parents will about what is being taught to children about AI, and of any AI use that requires disclosure or explicit permission.

8. Data Protection Implications of Using AI

Staff and pupils **must** not enter any personal information (personal data, intellectual property or private information) into any Generative AI model.

Staff who wish to use new, not yet recommended, AI tools will ensure that the Trust Data Protection Policy and Data Protection Impact Assessment Process and Procedure is followed before use of the AI tool. Staff will be aware that it is not always easy to recognise when AI tools are processing personal data and they will not presume that no processing is taking place.

As set out in acceptable use agreements, the school will use AI responsibly and with awareness of data sensitivity. Where used, staff should use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymised data to avoid the exposure of personally identifiable or sensitive information. This complies with best practice and GDPR regulations.

Staff should always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school. When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out. See Annex 6 in separate document.

9. Cyber Security

The school will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies. This responsibility lies within schools and the Trust's IT function. These measures include:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls, and secure storage.
- Establishing oversight procedures around data practice, system change, and incident response.
- Ensuring that any suspected or confirmed security incidents or breaches are reported to the Data Protection Officer.
- Carrying out an evaluation of the security of any AI tool before authorising it for use. This includes reviewing the tool's security features, terms of service, and data protection policies. This work will form part of the DPIA process.
- Training staff and pupils to be aware of the importance of cyber security and the potential involvement of AI to carry out cyber-crime.

10. AI Tools

The Trust have outlined a list of AI tools. The Trust recommends access to the green tools for business purposes. The listed AI tools may be updated at any time. This list is included as **Annex 1**, which can be found separately. Should staff wish to use another AI tool not listed, they must contact the IT Shared Services Team and DPO to discuss further.

The Trust takes the position that no AI tool can be effectively barred from use for staff, therefore the Trust provides a clear outline of the AI tools that are recommended for use and those that are not. Staff are trusted to use their professional judgment to make appropriate decisions when using AI. Pupils are only permitted to use Microsoft 365 Copilot (as part of school Microsoft 365 package) for use in school and at home for school purposes, where age appropriate. Education staff may demonstrate other tools to pupils where appropriate and to support educational awareness.

The tools recommended by the Trust are the preferred tools that staff should use. Staff and pupils should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.

11. Safeguarding

The safety of all children at our school is of the utmost importance. This policy has established a non-exhaustive list of potential risks AI poses to children:

- AI-generated child sex abuse material
- Deepfakes and manipulation of images or videos
- Grooming and exploitation
- Misinformation and radicalisation
- Over-reliance and social isolation

We are dedicated to ensuring the safety and wellbeing of every child. Therefore, the following measures will be embedded to support our safe AI use:

- The Trust recommends using AI tools that have filtering capabilities
- The Trust's IT function does not currently have access to real-time monitoring of AI tool usage for Microsoft 365 Copilot. However, when key words are used that flag a safeguarding concern, these are sent to the Designated Safeguarding Lead (DSL) at the end of each day.
- Staff will be trained and educated by the school on
    - AI-generated harmful content
    - AI-specific grooming techniques
    - AI-related safeguarding concerns
    - Regular updates on emerging threats
- Pupils will be provided age-appropriate education about
    - AI risks
    - How to evaluate AI content
    - Understanding digital footprints and privacy
    - Promotion of healthy relationships with technology
- The school will provide clear reporting procedures for AI-related concerns

- The school will support pupils and families if they have been negatively affected by AI use
- The school will review safeguarding, behaviour, child protection, and online safety procedures to integrate AI use and risks

All staff must report any incidents or suspected incidents concerning the use of AI in line with school policy. All staff will challenge any inappropriate behaviour.

12. Environmental Considerations

All AI systems require significant energy for operation, as data centres consume substantial amounts of water and electricity. This has a negative impact on the natural world, as data centres are one of the largest energy consumers[4]. Our school and Trust value sustainability and has regard for the impact our school and Trust make on the environment.

Therefore, when considering using AI, staff will:

- Consider whether AI is the most appropriate tool for each task
- Avoid unnecessary generation of multiple images or lengthy outputs
- Use existing resources before generating new AI content
- Consider educational and organisational benefits against environmental costs

13. AI Policy – Annex

Procedural information, such as the list of recommended AI tools, glossary and Trust Data Protection Impact Assessment Template, are provided separately in the AI Policy – Annex.

[4] Zewe, A. (2025) *Explained: Generative AI's environmental impact*, *MIT News*. Massachusetts Institute of Technology. Available at: https://news.mit.edu/2025/explained-generative-ai-environmental-impact-0117