Use of Artificial Intelligence (AI) Policy

Procedure Originator:	Tanya Rowley
Approved By:	SET Trust Board
Queries to:	Tanya.rowley@shaw-education.org.uk
Review Interval:	Annually
Date Reviewed	April 2025

Contents

1. Aims and scope

At Shaw Trust Education we understand the huge and positive potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation. AI has the power to transform education by helping teachers focus on what they do best: teaching.

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 trust community.

If used safely, effectively and with the right infrastructure in place, AI can ensure that every child and young person, regardless of their background, is able to achieve at school or college and develop the knowledge and skills they need for life.

AI must be used in a safe, ethical, and responsible manner, ensuring compliance with safeguarding, data protection, and academic integrity principles.

This policy ensures compliance with:

- Keeping Children Safe in Education (KCSIE) 2024
- UK GDPR and Data Protection Act 2018
- DfE Guidance on Generative AI in Education 2025
- JCQ Guidance on AI in Assessments 2025

Shaw Education Trust's Acceptable Use Policy (AUP), Online Safety Policy, and Data

Protection Policy

This policy covers the use of AI tools by staff, Trustees, Academy Councillors and pupils. This includes generative chatbots such as ChatGPT and Gemini and DeepSeek (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff across the trust to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, Trustees, Academy Councillors and pupils 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 allProtect privacy and personal data in compliance with 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. information for example: ChatGPT (Free or Plus versions via openai.com), Google Gemini (formerly Bard), DeepSeek, Claude (Anthropic – public versions) and Copilot in Edge (consumer version).

Closed generative AI tools are generally more secure, as external parties cannot access the data you input. For example: ChatGPT Team or ChatGPT Enterprise,

Microsoft Copilot (via Office 365 tenancy), TeachMateAI (if used within school domain), Oak National AI Lesson Planner and Robin AI for policy compliance checks.

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 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

As a Trust, we follow the 5 principles set out in the AI regulation white paper as follows:

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 errors. 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 they occur
Accountability and governance	Ensure that Trustees, the SET Executive Team, Headteachers, SLT 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

4.1 Trust-level AI lead

Our generative AI Trust Lead is **Tanya Rowley,** who is responsible for the strategic oversight of AI use across the trust.

4.2 Board of Trustees

The Board of Trustees will:

Delegate overall responsibility for monitoring this policy and holding school leaders to account for its implementation in line with the Trust's AI strategy to the SET Executive via the Scheme of Delegation.

Trustees will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools (see section 6)
- Seek advice from the data protection officer / IT / AI lead.
- 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

4.3 SET Executive Team

The Chief Infrastructure, Director of Digital and AI lead will ensure:

- The AI policy is reviewed and updated as appropriate, and at least annually
- School leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the Trust
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the data protection officer (DPO), AI lead, and data protection impact assessments.

4.4 School leaders

School leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their school
- 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
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure pupils are taught about the effective use and potential risks of AI

4.5 Trust Data Protection Officer (DPO)

The Trust Data Protection Officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, cybersecurity standards, and safeguarding requirements including in relation to the use of AI.

Please contact our Trust DPO

4.6 Designated Safeguarding Leads (DSL)

Designated Safeguarding Leads are responsible for monitoring and advising us on our compliance with safeguarding requirements including in relation to the use of AI, such as:

*   Being aware of safeguarding threats posed by AI, including but not limited to: deep fakes and impersonation, harassment and bullying, criminality, coercion, grooming and exploitation
*   Updating and delivering staff training on AI safeguarding threats
*   Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE)

The Trust Director of Safeguarding lead is Brian Duffy and is contactable via 07976 174 720 or via email at brian.duffy@shaw-education.org.uk

4.7 All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, 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:

*   Seek advice from the Data Protection Officer/IT lead/AI lead, Director of Digital 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
*   Use AI as a teaching aid, not as a replacement for pedagogy
*   Verify AI-generated content for accuracy, appropriateness, and bias
*   Educate students on AI literacy, misinformation, and deepfakes
*   Ensure AI use does not compromise academic integrity or safeguarding
*   Engage in annual update training to ensure compliance and risk mitigation for the latest risks

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

4.8 Pupils

Pupils must:

Follow the guidelines set out in Section 7 of this policy (Educating Pupils about AI)

5. Safeguarding and Online Safety

AI must be used safely across the trust to prevent harm, it is therefore important that staff and pupils understand the potential risks associated with AI-generated content, including misinformation, impersonation, and explicit or offensive material.

5.1 Preventing AI-Generated Harm

- AI must not be used to create or share harmful, misleading, or inappropriate content
- Staff and pupils will receive regular and appropriate training to recognise and respond to AI risks such as deepfakes, misinformation, and impersonation
- The Trust's/schools filtering and monitoring systems will be maintained to detect and prevent AI-generated threats, (as per the Government's Filtering and Monitoring standards). The appropriate filtering and monitoring systems will attempt to block internet access to harmful sites and inappropriate content, including the detection of harmful AI material
- Any misuse of AI that poses a safeguarding concern will be addressed through the Trusts/school's safeguarding procedures

5.2 Referral to our child protection and safeguarding policy

The trust is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material
- Harmful content
- Harmful advertisements and promotions
- Bullying

Where there are safeguarding concerns arising from the use of generative AI a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the trust's child protection and safeguarding policy and child protection referral process.

5.3 AI and Cybersecurity

As AI systems become more integrated into our operations, cybersecurity risks must be managed to prevent unauthorised access, phishing attempts, and data breaches.

AI-related cybersecurity threats such as phishing, fraud, or unauthorised access must be monitored and reported. The IT team will ensure that AI tools used across the trust do not introduce security vulnerabilities or compromise data protection. Staff must follow data protection guidance when using AI tools, particularly when handling sensitive or personal information.

Staff should be aware that generative AI tools may store or process data on servers located in countries with limited data protection regulations or known cybersecurity threats. Therefore, all data must be treated as potentially public when using these platforms.

Contacts:

- John Lavelle: Regional Head of Digital Support Services, at john.lavelle@shaw- education.org.uk
- Dave Orum Regional Head of Digital Services, at dave.orum@shaw-education.org.uk

5.4 AI and UK GDPR/Data Protection Compliance across Shaw Education Trust and Data Protection Impact Assessments (DPIAs)

Shaw Education Trust mandates Data Protection Impact Assessments for all AI implementations involving personal data processing, as required by Article 35 UK GDPR. DPIAs must:

- Evaluate risks posed by AI systems to individual rights (e.g., automated decision-making or large-scale processing of sensitive data)
- Document technical safeguards against biases, inaccuracies, or unauthorised data access
- Justify why AI is necessary over less risky alternatives

For example, AI tools used for student performance analytics or staff workload automation require a DPIA before deployment. The Trust's Data Protection Officer oversees this process, supported by the GDPRiS compliance platform for centralised risk management.

5.5 Transparency via Privacy Notices

The Trust and schools update their privacy notices to explicitly inform stakeholders (students, staff, parents) about:

- Specific purposes for AI-driven data processing (e.g., attendance tracking or plagiarism detection)
- Legal bases under GDPR (e.g., public task or legitimate interests)
- Rights to opt out of automated decision-making where applicable (and how to opt out)

These notices are accessible through school websites and parental communication channels.

5.6 Mitigating Function Creep

Function creep is the unauthorised expansion of AI systems beyond their original purpose –

is addressed through:

- **Purpose Limitation Clauses**: All AI contracts and internal protocols specify permitted use cases
- **Technical Controls**: Role-based access restrictions and audit logs prevent unauthorised repurposing of AI tools
- **Staff Training:** Annual GDPR sessions highlight risks like using facial recognition systems for non-security purposes

The Trust's DPIA review process includes quarterly audits of AI systems to detect and rectify scope deviations.

6. Use of AI by Staff, Trustees and Academy Councillors

6.1 Approved use of AI

At Shaw Education Trust we are committed to helping staff, Trustees and Academy Councillors 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, Trustee or Academy Councillor using an AI-generated plan, policy or document should only share the AI-generated content 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 Trust has approved its use doesn't mean it will always be appropriate.

The table below sets out examples of approved AI tools and the approved uses for each tool.

Approved tools	Approved uses
Oak Academy AI lesson planner	Lesson planning
Robin Education	Compliance checks and policy audits
TeachmateAI	Education AI assistant
Microsoft Co-pilot	Assist with tasks, provide information etc
Chat GPT, DeepSeek (Open source Generative AI)	Non-Confidential tasks, drafting ideas, teacher prompts etc
Canva Shield	Designing lesson materials, posters, newsletters
Socrative AI	Generating Quizzes for assessment or revision
SHOWBIE AI	Drafting teacher feedback or generating planning comments
Arbor AI	Analyses student performance, admin tasks.

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

Staff may use general open-source generative AI tools such as ChatGPT, and DeepSeek only for non-confidential tasks, such as drafting ideas, summarising publicly available information, or generating teaching prompts — provided they follow Trust data protection guidance.

These tools must not be used to upload or process students' original work, as doing so could infringe upon their intellectual property rights.

Under no circumstances should staff input personal, sensitive, or confidential data (including pupil names, behavioural or attainment records, staff data, or internal Trust documents) into any generative AI tool.

In selecting AI tools for your setting, please follow the DfE's guidance and use the "Using AI in education settings" toolkit, which includes a practical framework for assessing whether a generative AI tool is suitable, proportionate, and compliant before deployment:

https://www.gov.uk/government/collections/using-ai-in-education-settings-support-materials

6.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their senior leader to discuss any ideas they may have with regards to using AI, so they can take the suggestions forward if they deem it to be a satisfactory new method of working.

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

6.3 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.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Shaw Education Trust will treat this as a data breach and will follow the personal data breach procedure outlined in our Data Protection Policy.

Please also refer to section 10 of this policy.

6.4 Intellectual property

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

Pupils 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.

Shaw Education Trust 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.

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

6.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics. 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.

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

The Trust will make every effort to ensure that AI systems do not perpetuate or exacerbate biases, particularly with respect to any protected characteristics.

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

If parents/carers or pupils 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 complaint's procedure. See our Complaints Policy.

A formal process for reporting concerns or grievances relating to AI practices will be established. This ensures transparency and the ensuring that issues are addressed properly.

6.6 Raising concerns

We encourage staff to speak to their school senior leader in the first instance if they have any concerns about the potential use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

6.7 Ethical and responsible use

AI should be implemented in ways that are fair, transparent, and aligned with ethical considerations.

Shaw Education Trust will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our Trust'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
- Comply with data protection regulations
- Identify AI generated content where used

Staff members, Trustees and Academy Councillors 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

7. Educating Pupils about AI

Shaw Education Trust acknowledge that pupils 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 pupils develop the right skills to make best use of generative AI.

Students should be taught about the potential benefits of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly in line with this and the school's policy
- 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
- Ethical considerations and avoid over-reliance on AI

Students must develop an understanding of AI's capabilities and limitations while using AI tools ethically and responsibly within the guidelines set by this policy.

8. Use of AI by pupils

Shaw Education Trust recognises that AI has many uses to help pupils learn. Pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images

All AI-generated content must be properly attributed and appropriate for the pupils' age and

educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, pupils 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
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, for maths calculations)
- AI must not be used to generate coursework, essays, or exam content

This list of AI misuse is not exhaustive.

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

In our schools we consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures as set out in the appropriate school policy/document.

Pupils 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

9. Formal Assessments

Shaw Education Trust will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See the exams / assessment policy for more details.

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

To maintain assessment integrity:

- Students must declare AI-assisted work, and staff must monitor submissions for signs of unauthorised AI use.
- Students must declare any AI-assisted work in line with JCQ and school regulations
- Staff must monitor for sudden changes in student work that suggest AI misuse e.g. work that is suddenly better than previously seen, Americanisation of language, other hallmarks of AI-generated content

10. Staff training

At Shaw Education Trust, we are committed to ensuring that all staff have a clear understanding of artificial intelligence (AI) and its relevance to education. We recognise that AI is a rapidly evolving field and are dedicated to supporting staff to stay informed, confident, and equipped to use AI effectively and responsibly.

Staff will be kept up to date through regular professional development opportunities, including Trust-led training sessions, events and updates using trusted keynote speakers where appropriate. This will ensure that staff are aware of both the opportunities AI presents and the risks it may pose.

We will continue to share best practice, highlight relevant research, and provide access to trusted providers to support ongoing learning. Our central team, in conjunction with the IoE, will oversee the coordination of AI-related CPD to ensure alignment with Trust-wide priorities and statutory guidance.

11. Breach of this Policy

11.1 By Staff

Breach of this policy by staff will be dealt with in line with the Trust's staff Code of Conduct. 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 school device
- At home, at school 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 the trust with access to:
- The generative AI application in question (whether or not it is one authorised by the Trust)
- Any relevant passwords or login details

Staff must report any breach of this policy, either by themselves or by another member of staff, to their senior leader immediately.

11.2 By Trustees or Academy Councillors

Trustees or Academy Councillors found in breach of this policy will be subject to investigation and potential removal from post pending the outcome at the discretion of the Trust Board, in both circumstances.

11.3 By Pupils

Any breach of this policy by a pupil will be dealt with in line with the school's Behaviour Policy.

12. Monitoring and Transparency

AI technology, and the benefits, risks and harms related to it, evolve and changes rapidly. Consequently, this policy is a live document that must be kept updated by the AI Lead whenever there is a significant change to either AI use by the Trust 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 in a timely manner.

The policy will be shared with the Board of Trustees at least annually.

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

All AI systems will be continually monitored and reviewed for their effectiveness, fairness and impact on learning outcomes. Regular audits (through the QAL process) will be conducted to ensure compliance with the policy.

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

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

13. Links with Other Policies

- This AI policy is linked to our:
- Data Protection Policy
- Assessment Policy
- Exams Policy
- Homework Policy
- Behavior Policy
- Staff Code of Conduct
- Marking and Feedback Policy
- ICT Acceptable Use Policy
- Online Safety Policy
- Equality Policy
- Safeguarding and Child Protection Policy
- Filtering and Monitoring Policy

Shaw Education Trust

Pupil & people centred

Act with integrity

Be innovative

Be best in class

Be accountable