Artificial Intelligence (AI) Policy

(Using a template by the Education Data Hub and a range of sources cited in the introduction)
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Date	Version	Reason for change	Overview of changes made	Source
24.8.24	0.1	New policy		- DfE[1] - Teacher Development Trust, The Association of School and College Leaders and The International Society for Technology in Education[2] - Education Data Hub (AI Guidance for Schools. Data Protection Officer Guidance from The Education Data Hub Version 2 - ICO[3] - JCQ[4] - Using Gemini - Google experience day.
18.10.24	1.0	Board Review	Ratified by Board	

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[1] In Spring 2023 the Department for Education (DfE) published a document setting out their position on the use of Generative AI and in the summer of 2023 launched a call for evidence from the education sector on its use. The position document was updated in October 2023 and should be read by school leaders. It contains important key messages for the sector, identifying that whilst Generative AI has the potential to reduce workload and free up teachers' time, it also carries risks.

[2] In September 2023, joint guidance from 5 major organisations (including the Teacher Development Trust, the Association of School and College Leaders and the International Society for Technology in Education) was released: Understanding AI for School: tips for school leaders. This guidance is aimed at equipping leaders to be prepared for the new AI era.

[3] The Information Commissioner's Office has produced Guidance on AI and Data Protection and is essential reading for Data Protection Officers supporting the deployment of AI in schools. Your Data Protection Officer should be aware of the relevant legislation and the ICO guidance and should advise the school accordingly.

[4] The Joint Council for Qualifications has also provided guidance to schools relating to the use of AI in assessments, stating that teachers and assessors in schools and colleges play a key role in ensuring that only work which is the student's own is accepted for assessment and that any concerns regarding authenticity are carefully looked into. A school that is open and transparent about the use of AI, with good governance arrangements, will find it easier to comply with JCQ standards. The JCQ offer a suite of information and resources to support staff and children to understand the implications of using AI in assessed work.

Objectives

- Outline how AI can be used to enhance learning & teaching, streamline operations and reduce workload.
- Develop guidelines for appropriate staff and children's use of AI tools.
- Foster ethical and responsible AI use.
- Outline accountability, the mechanisms for oversight and responsible use.
- Protect children and staff data privacy.

1. Introducing our AI Policy

1.1. 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. 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. Generative AI is a rapidly evolving and increasingly freely available technology generating writing, audio, codes, images and video simulations. Whilst this offers opportunities for schools and their children, it also increases risk.

AI has the potential to revolutionise the way we learn. The use of AI has a potential to fundamentally change the traditional ways of working in schools. AI-powered tools can personalise learning for children, provide teachers with valuable insights and automate administrative tasks. Here are some of the ways AI is being used in schools:

- Personalised learning: AI tutors can adjust their difficulty level and teaching style to match each child's individual needs.
- Automated grading and feedback: AI can quickly grade essays and other assignments, freeing up teachers' time to provide more personalised feedback.
- Administrative tasks: AI can handle tasks such as scheduling, grading, and record-keeping allowing teachers to focus on teaching.
- Special needs support: AI tools can provide targeted support for students with disabilities, such as text-to-speech software or language translation.

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 schools. By embracing AI technology, we aim to:

- Enhance academic outcomes and educational experiences for children,
- Support teachers in managing their workload more efficiently and effectively,
- Educate staff and children about safe, responsible and ethical AI use,
- Incorporate AI as a teaching and learning tool to develop staff and children's AI literacy and skills,
- Prepare staff and children 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,
- Improve and streamline school operations to minimise cost and maximise efficiency..

1.3. 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 children 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 children's work, to be used to train Generative AI models without appropriate consent or exemption to copyright.

1.4. 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.

1.5. We will be transparent and accountable about the use of AI technology so that stakeholders, including staff, children, 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.

1.6. 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

The Governance of AI

Leaders ensure AI usage is acknowledged, developed and overseen with strategic vision. Our AI governance aims to:

- Balance necessity and the excitement of involvement in an exciting new way of working against risk – ensuring that legal, commercial, security and ethical requirements are set out,
- Establish clear roles and responsibilities – with key understanding of responsibility and wider team expertise and input. One of the key differences brought about by AI decision making is that it can be less clear about who is accountable for decisions that affect individuals. It is important that there is no loss of accountability when a decision is made using AI,
- Establish processes to identify necessity, risk and risk management and monitor this over time - see risk management and processes for reporting a safeguarding, cyber, fraud or other risk.

2.1. This Policy applies to all staff, including temporary staff, consultants, governors, volunteers, and contractors and anyone else working on our behalf. It is also applicable to children, 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. There are a number of staff in the Trust who are key contributors to AI policy and development:

- The CEO is supported by each Headteacher who act as a lead for each of our schools regarding the use of AI technology, supporting the monitoring of compliance with this policy and works with other staff to communicate, promote and regulate AI use, providing or arranging for training to be given where necessary,
- Our Data Protection Officer is responsible for advising us about our data protection obligations in relation to AI use,
- Our IT support provides technical support and guidance on the operation of AI,
- LGCs at school level and our Finance, Audit and Risk Committee will be responsible for AI Governance,
- Our IT champions support our AI strategy.

2.5. Training will emphasise how AI can augment staff roles, providing them with more time and resources to focus on tasks such as personalised instruction, pupil engagement, and critical thinking.

2.6. By combining the benefits of AI technology with professionals' expertise, experience, and professional judgement, we can create a collaborative and effective educational environment that maximises the benefits of both human and AI capabilities.

2.7. This policy also links to other school policies, including the Child Protection and Safeguarding, Data Protection, IT Security and Acceptable Usage, Business Continuity, Cyber Security and IT Disaster Recovery, Curriculum, Homework, Feedback and Marking guidance, and should be read in conjunction with them.

3. Use of AI by staff

3.1. Staff are permitted to explore and utilise AI-based tools and technologies to assist in managing their work. Examples of such tasks may include marking and feedback, report writing, lesson planning, professional development and facilities management. AI can provide valuable support while still incorporating professional judgement and expertise.

We will maintain a list of approved AI tools which can be used in schools.

The only authorised Generative AI in school and on school machines is Google Gemini.
https://support.google.com/gemini/answer/13594961?hl=en-GB

3.2. All tools will be used responsibly, ensuring they complement staff professional judgement and expertise, without replacing them.

3.3. Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used.

3.4. Staff will receive appropriate training and support to effectively integrate AI into their work including professional development opportunities focused on AI tools and their effective integration into school administrative and teaching

practices. Training and support will be planned as part of staff personal development reviews and appraisals or on an as-needed basis. Staff have a responsibility to identify any training and development needs to ensure they adhere to this policy and should discuss these with their line manager.

3.5. AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, AI-based platforms can suggest specific topics or learning activities. Teaching staff are permitted to use these suggestions as a starting point, incorporating their professional expertise to customise the lesson plans and make necessary adjustments to ensure pupil learning objectives are met.

3.6. AI tools can be utilised to automate certain aspects of marking of pupil work, such as multiple-choice or fill-in-the-blank assessments. Teaching staff can use AI-powered marking software to speed up scoring fact based responses to objective questions, providing more time to support children individually.

3.7. Teaching staff can also use AI to identify areas for improvement in more subjective written answers. Teaching staff will review and verify AI-generated marks or feedback to ensure accuracy, and add their professional judgement, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.

3.8. Teaching staff can also support children to gain feedback on their work themselves using AI, replicating peer assessment processes. This will allow children to receive instant personalised and valuable feedback and improvement strategies on their work, helping to identify misconceptions and gaps in knowledge, as well as helping them develop more structured or creative writing. It is important that teaching staff play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.

3.9. Teaching staff can use AI to assist in writing pupil reports, ensuring accuracy and efficiency while maintaining their professional judgement. Where AI has been used to support with report writing, the staff member will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments and personalised feedback.

3.10. Staff can use AI as a starting point to gather relevant information and identify patterns in pupil attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each pupil's progress. By using AI responsibly in pupil progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on children' academic achievements and overall development.

3.11. 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. Use of AI by children

4.1. As part of child protection and safeguarding policies and processes, the school will ensure that its children 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 children's 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.

4.2. Children will be permitted to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis and creative expression.

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

4.4. Children will be taught not to enter personal, sensitive or confidential data into Generative AI tools.

4.5. AI education will be incorporated into the curriculum to provide children 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.

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

5. Potential Misuse of AI
5.1. Children 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. Children will be encouraged by staff to be clear and transparent about when their work has been created with the assistance of AI.

5.2. 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 children regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.

5.3. Key messages are delivered and are emphasised in all subjects where children are completing work for external grading.

5.4. The Trust 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.

5.5. 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 children's comprehension beyond that which AI tools can assess, promoting deep learning and authentic pupil engagement.

5.6. Teaching staff will educate children on the potential misuse of AI by those seeking to deceive or trick children 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.

6. Ethical Use of AI

6.1. The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations. Whether staff are using AI for teaching or school administrative purposes, or with children who will make use of this technology, they should be mindful of, and instruct children about, the following considerations:

6.1.2. 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.

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

6.1.4. Currency – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

7. Data Protection implications of using AI
Whilst many uses of AI do not trigger data protection concerns, entering any personal data (where an individual can be either directly or indirectly identified) into AI tools, or using AI to make decisions about individuals presents data protection challenges. The data protection principles of lawfulness, transparency and fairness, purpose limitation, data minimisation, accuracy, storage limitation and security and accountability are highly relevant, and schools must be satisfied that those principles are adhered to, as well as ensuring that data subjects are able to exercise their rights in relation to any data processing (particularly where decisions are made about them using automated processing or their data becomes part of the AI model for future decision making). Transparency not only plays an important role in engendering trust and confidence in the increasing role of AI in society but is a legal requirement when personal data is processed, as are the other data protection principles.

7.1. Staff and children should be aware that any information entered into a Generative AI model is no longer private or secure. Staff and children must not enter any personal information (personal data, intellectual property or private information including commercially sensitive information, such as contracts into any Generative AI model. Staff should make themselves aware of and inform children about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

7.2. Staff who wish to utilise AI tools must ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required and follow the Trust Data Protection Policy and Data Protection Impact Assessment Procedure.

7.3. 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.
7.4. Any DPIA or assessment of the data protection aspects of the use of AI will include:
- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities,
- 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,

- A clear indication where AI processing and automated decisions may produce effects on individuals,
- 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 children for different interventions results in gender or racial bias),
- 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,
- An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals,
- 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,
- If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions,
- 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,
- The potential impact of any security threats,
- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders,
- 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, where a postcode infers a particular race),
- 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.

8. Cyber security

8.1. Our school will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage,
- Establishing oversight procedures and controls around data practices, system changes and incident response to maintain integrity,
- Ensuring that any suspected or confirmed security incidents are reported to the CEO and the Data Protection Officer,
- 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,
- 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). These can be used to spread misinformation or impersonate someone to commit cyber fraud,
- Training staff and children to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

Therefore, we need to prepare staff and children for changing workplaces, including teaching them how to use emerging technologies, such as generative AI safely and appropriately. For both staff and children this may include understanding the limitations, reliability and potential bias of generative AI - to an extent, staff will be learning lessons at the same time as children during this time of rapid development.

Schools are also required to ensure that children are safeguarded adequately, including ensuring that they are protected from potentially harmful and inappropriate online material. As schools we have little control over the building of generative AI and whilst aware of its potential to generate harmful content, have no control over this so careful supervision and control is essential.

Understanding risk in relation to the use of AI is an important consideration; it may be that risk can only be reduced rather than removed entirely, but, nevertheless, scoping and monitoring risk is required for its safe use. We cannot govern AI unless they understand the risk.