



Use of Artificial Intelligence (AI) policy

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1. Aims and scope

At Spa Education Trust, we recognise that artificial intelligence (AI), including generative AI, has the potential to improve access to learning, communication, and independence for pupils with special educational needs and disabilities (SEND). Used appropriately, AI can support personalised learning, assistive technology, and staff efficiency.

However, we also recognise that pupils with SEND may be more vulnerable to the risks associated with AI, including misinformation, over-reliance, reduced human interaction, safeguarding risks, and a limited understanding of data privacy or consent.

This policy sets out our approach to a safeguarding-led approach to the use of AI across the Trust community. The aim of the policy is to establish guidelines for the ethical, secure and responsible use of AI technologies.

This policy covers the use of AI tools by school staff, trustees/governors and pupils. This includes generative chatbots.

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, trustees/governors 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 all staff, trustees/governors and pupils
- Protect the privacy and personal data of staff, trustees/governors and pupils in compliance with the UK GDPR
- Ensure that AI use enhances accessibility and inclusion without increasing risk, dependency, or inequality for pupils with SEND.

2. Legislation and guidance

This policy reflects good practice guidelines/recommendations in the following publications:

- [Generative artificial intelligence \(AI\) and data protection in schools](#), published by the Department for Education (DfE)

This policy also 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 \(DPA 2018\)](#)
- [Data \(Use and Access\) Act 2025](#)

3. Roles and responsibilities

This policy is coordinated by the Executive Headteacher, the Headteacher or Head of School, and the Deputy Heads. They are the Digital Leads across the trust and are responsible for the day-to-day management of AI use in the school. They work directly with Allied Technical Services (ATS), who provide ICT support across the Trust. Breaches of this policy may be dealt with under our staff code of conduct

3.1 Trustees

Trustees will:

- Take overall responsibility for monitoring this policy and holding the Digital Leads to account for its implementation in line with the school's AI strategy.
- Ensure the Digital Leads are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school.
- Adhere to the guidelines below to protect data when using generative AI tools.
- Use only approved AI tools (see section 5 and appendix 1).
- Seek advice from the executive headteacher and the designated safeguarding leads, as appropriate.
- 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

3.2 Executive Headteacher, Headteacher or Head of School and Deputy Headteachers

The Executive Headteacher, Headteacher or Head of School and Deputy Headteachers will:

- Take responsibility for the day-to-day leadership and management of AI use in the school.
- Ensure that the use of AI is in accordance with Keeping Children Safe in Education and the school's child protection and safeguarding policy.
- Ensure that the guidance set out in this policy is followed by all staff.
- Review and update this AI policy as appropriate, and at least annually.
- 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.
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO and data protection impact assessments.

3.3 Data Protection Officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI. They will Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation.

Our DPO is

Internally: Nusrat Raja and is contactable at nraja@spa-education.org or the school office (02034345210)

Externally: Judicium and is contactable at enquiries@judicium.com (03455487000)

3.4 Designated Safeguarding Leads (DSL)

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

- Being aware of new and emerging safeguarding threats posed by AI
- Updating and delivering staff training on AI safeguarding threats
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE) and the school's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices.

The trust's DSLs are:

- Steph Lea: DSL for Spa Education Trust
- Georgina Quigley: DSL for Spa School Bermondsey
- Rian Ehlers: DSL for Spa School Camberwell

They can be contacted via the school office.

3.5. 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:

- Use only Microsoft Copilot (other AI tools such as ChatGPT) are not approved.

- Seek advice from the executive headteacher, headteacher and deputy headteachers as appropriate.
- Report safeguarding concerns to the DSL in line with the trust's safeguarding policy.
- 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

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 are responsible for guiding pupils in critically evaluating AI-generated information and understanding its limitations.

3.6 Pupils

Pupils will be supported to use AI tools in ways that are appropriate to their age, understanding, communication needs and level of independence.

Pupils will:

- Use AI tools only when permitted and supervised as appropriate.
- Follow guidance given by staff about safe and responsible use.
- Report anything confusing, upsetting or worrying to a trusted adult.

Expectations for pupil use will be differentiated and supported, recognising that not all pupils are able to understand or manage AI tools independently.

4. Process for approving AI use

The headteacher or head of school is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO and Digital Leads.

Any use of generative AI by staff and pupils will be risk assessed, which will include plans for mitigating against unauthorised use cases. The intended use case will be specified and have clear benefits that outweigh the risks.

As part of this process, we will seek assurances from suppliers of AI tools about how their products meet the DfE's [AI product safety standards](#).

If it is strictly necessary to use an AI tool to process personal data, we will carry out a data protection impact assessment (DPIA) in addition to the risk assessment. The DPO will advise on this. If the use case is approved, we will also update our privacy notices accordingly.

In the case of AI tools intended for use by pupils, the risk assessment process must consider:

- Age restrictions set by AI tools
- Statutory requirements of [KCSIE](#) and our child protection and safeguarding policy
- [Filtering and monitoring standards](#) to make sure we have the appropriate systems in place to protect pupils from harm
- The DfE's [AI product safety standards](#)

5. Staff, Trustees and Governors' use of AI

5.1 Approved use of AI

We are dedicated to helping staff, trustees and governors manage their workload. Generative AI can streamline certain written tasks, but it cannot replace human expertise. The quality and content of any document produced remain the responsibility of the individual. AI-generated content must be clearly attributed, and it should only be shared if the user is confident in its accuracy.

Consider whether AI is appropriate for the task at hand, even if it's approved for use. AI must never replace professional judgment, decision-making, or direct interactions with pupils. Staff should be cautious about pupils misunderstanding or becoming overly reliant on AI-generated content.

5.2 Process of approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the Digital Leads to discuss any ideas they may have with regards to using AI, so suggestions can be taken forward if they are deemed to be a satisfactory new method of working.

The Headteacher or Head of School is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO and data protection impact assessments.

5.3 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, Spa Education Trust will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy, which can be found [HERE](#).

Please also refer to section 10 of this policy.

5.4 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output.

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

We 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 arising from AI use, these will be dealt with through our usual complaints procedure. Our Complaints Procedure Policy can be found [HERE](#)

5.5 Raising Concerns

We encourage staff, trustees and governors to speak to the Headteacher in the first instance if they have any concerns about a proposed use of AI, or about AI use that may have resulted in errors that have led to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with the trust's child protection and safeguarding policy.

5.6 Ethical and Responsible Use

We will always:

- Use generative AI tools ethically and responsibly.

- Remember the principles set out in the trust's equality policy when using generative AI tools. Our Equality Information and Objectives Document can be found [HERE](#).
- 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.

Staff, trustees and governors 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.

6. Educating pupils about AI

We 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 the best use of generative AI. Teaching about AI will be adapted and differentiated to meet pupils' need. This may include:

- Visual supports, symbols or social stories
- Repetition and modelling
- Explicit teaching about "not everything a computer says is true"
- Creating and using digital content safely and responsibly
- Online safety to protect against harmful or misleading content.

Where appropriate, education about AI will prioritise online safety, recognising confusion or harm, and knowing when to seek help, rather than technical understanding.

7. Use of AI by pupils

Pupils may only use AI tools where this use:

- Has been approved by the school
- Is supervised according to individual need
- Does not involve entering personal or sensitive information

AI may be used by pupils:

- As a supported research or discussion tool, with staff guidance
- As part of structured lessons about AI
- As an assistive technology to support communication, literacy or access, where this forms part of reasonable adjustments.

Pupils will not:

- Use AI tools independently without permission where supervision is required.
- Use AI to complete work intended to demonstrate their own learning
- Input personal information about themselves or others

Decisions about pupil access to AI will be made on a case-by-case basis, taking into account safeguarding risks and individual needs.

8. Formal assessments

AI tools must not be used by pupils in formal assessments unless explicitly permitted by awarding bodies or as an approved reasonable adjustment. Staff must ensure compliance with examination regulations and SEND access arrangements.

9. Staff training

Staff will be kept up to date with developments in AI, and supported to develop and improve their practice on a regular basis.

Regular training will cover:

- Data privacy (what must *never* be put into AI tools)
- Age-appropriate use and supervision expectations
- Bias, fairness, and harmful outputs
- Copyright and intellectual property basics
- How AI intersects with safeguarding and duty of care
- Understanding capacity, consent and vulnerability in relation to AI
- Supporting pupils who may take AI outputs literally
- Managing emotional or behavioural responses to AI content

10. Referral to our child protection and safeguarding policy

The school 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 [safeguarding policy](#)

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with our [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 us with access to:

- The generative AI application in question (whether or not it is one authorised by the school)
- Any relevant passwords or login details

Staff must report any breach of this policy, to the executive headteacher, headteacher or deputy headteacher immediately.

11.2 By pupils

Any breach of this policy by a pupil will be dealt with in line with our [behaviour and safeguarding policies](#).

12. Monitoring and transparency

AI technology, and the benefits, risks, and harms associated with it, evolve rapidly. Consequently, this policy will be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

The policy will be shared with trustees and local governing bodies at least annually.

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

The executive headteacher will monitor the effectiveness of AI usage across the school.

We will ensure that members of the trust community are kept up to date on the use of AI for educational purposes. Feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in the trust.

We recognise the importance of transparency with parents/carers. Information about the school's approach to AI, including assistive technology, will be shared clearly, and concerns will be welcomed

13. Links for other policies

This AI policy is linked to our:

- Data protection policy
- Safeguarding policy
- Behaviour policy
- Staff Disciplinary Policy
- ICT and Internet Acceptable Use Policy
- Equality Information and Objective