THE SYDNEY RUSSELL SCHOOL

ARTIFICIAL INTELLIGENCE (AI) POLICY

Approved: September 2026

Chair of Governors | Craig Smith

Principal | Clare Cross

Review Date: Sept 2027



Contents

Policy Introduction 3

Purpose 3

Scope 3

Statement 3

Legislation & Guidance 4

Definitions 4

Ethical Position on AI 5

Responsible AI Management in Education 5

User Responsibilities 6

Privacy, Data & Security 6

Human Agency Oversight 6

Societal & Environmental Considerations 6

Compliance & Violations 6

Policy Introduction

Purpose

The purpose of this policy is to ensure that Artificial Intelligence (AI) and related data technologies are understood, monitored, and managed responsibly within Partnership Learning.

We acknowledge that AI technologies are becoming more prevalent in education and wider society. While Partnership Learning recognises the importance of awareness, control, and ethical oversight of these tools where they intersect with teaching, learning, and administration.

Scope

This policy applies to all AI and data technologies used within Partnership Learning schools, whether intentionally adopted or encountered through third-party tools, online platforms, or digital systems. It includes classroom tools using automated decision-making, administrative systems that process educational data, and AI-based learning or assessment applications.

Statement

Partnership Learning aims to manage the presence and potential use of AI in education with caution, transparency, and accountability. We are committed to maintaining the integrity of teaching and learning, safeguarding personal data, and ensuring that any interaction with AI aligns with our values of fairness, respect, and human oversight.

Legislation & Guidance

This policy meets the requirements of the UK Government AI Policy & Guidance

AI Regulation White Paper (2023) | A pro-innovation approach to AI regulation
https://www.gov.uk/government/publications/ai-regulation-a-pro-innovation-approach

Guidance for Regulators on Implementing AI Principles (2024) | Implementing the UK's AI regulatory principles: Initial guidance for regulators
https://www.gov.uk/government/publications/implementing-the-uks-ai-regulatory-principles-initial-guidance-for-regulators

UK Government AI Playbook (for public sector use) | Artificial Intelligence Playbook for the UK Government
https://www.gov.uk/government/publications/ai-playbook-for-the-uk-government

Data Protection & AI Guidance | ICO – Guidance on AI and Data Protection (Explains fairness, transparency, automated decision-making rules, etc.)
https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/

Online Safety

Online Safety Act 2023 | (Important for AI-generated content and platform responsibilities)
https://www.gov.uk/government/collections/online-safety-act#the-online-safety-act-2023

Definitions

Key terms such as Artificial Intelligence, Data, Ethical Use, Privacy and Data Governance, and Human Oversight remain consistent with established guidance (e.g., European Commission's "Ethical Guidelines on the Use of AI and Data in Education," 2022).

These definitions ensure a shared understanding while emphasising that human judgment remains central in all educational decision-making.

Ethical Position on AI

Partnership Learning's Stance

Partnership Learning recognises that AI can have both positive and negative impacts on education. Our approach is measured and cautious, focusing on understanding how AI operates and affects learners and staff, managing its use ethically and transparently, and protecting against misuse, over-reliance, or inequity.

Ethical Principles

All AI and data use within Partnership Learning will adhere to:

- Human Oversight – AI must never replace human judgment or accountability.
- Fairness and Non-Discrimination – AI tools must not introduce or reinforce bias.
- Transparency – Users must know when and how AI is involved in a process.
- Privacy – AI use must comply with data protection laws and avoid unnecessary data processing.
- Educational Integrity – AI should support learning awareness, not replace authentic student effort.

Responsible AI Management in Education

Approach

AI may appear in educational or administrative tools used across Partnership Learning schools, even when not actively introduced. The Trust's responsibility is to identify, evaluate, and manage such technologies to ensure correct use.

Example Areas of Use (Monitored)

- Automated marking or feedback systems.
- Language learning or accessibility applications.
- Administrative chatbots or data management tools.

Each of these areas will be reviewed for privacy, equity, and pedagogical impact before use.

Risk Management

For every identified platform that AI is utilized, a GDPR DPIA must be completed to address the potential risks to subjects data.

User Responsibilities

Staff and Leaders

Staff are responsible for using AI-related tools only when authorised and understood, ensuring that human professional judgment guides all final decisions, and reporting any AI system or digital tool that operates without clear transparency or data protection assurance.

Students

Students should avoid using AI tools to complete or generate assessed work unless explicitly permitted, acknowledge any use of AI in learning or research, and understand both the potential and the limitations of AI.

Data and Safeguarding

All AI use must align with GDPR, safeguarding, and online safety standards. Data must not be entered into AI platforms unless explicitly approved and securely managed.

Privacy, Data & Security

Partnership Learning prioritises data minimisation, protection, and informed consent in all digital systems.

AI tools that process data will be subject to Trust-level DPIA (data protection impact assessment) and must comply with existing Data Protection and ICT Acceptable Use Policies.

Human Agency Oversight

AI should always operate under human supervision.

Teachers, leaders, and IT staff must be able to explain, question, and override AI-driven recommendations. Training will be provided to ensure staff can identify and manage AI-related risks.

Societal & Environmental Considerations

The Trust recognises that AI has wider implications for society and sustainability. Partnership Learning will encourage critical discussion of AI's social and ethical effects and consider the environmental cost of data technologies when making procurement decisions.

Compliance & Violations

Misuse of AI including unauthorised use, privacy breaches, or academic dishonesty will be treated as a violation of the Trust's Acceptable Use, Data Protection, or Behaviour Policies.

Review & Guidance

This policy will be reviewed annually by the Trust, ensuring it remains relevant as AI technologies evolve.

Revisions will be approved by the Partnership Learning Audit and Risk Committee

Data Protection

AI tools may process or store data, often on external servers. Any processing of personal data must comply with UK GDPR.

- Personal data should not be input into any AI systems that will learn from the input, consult the 'Approved AI tools register' for tools that are approved for this purpose. Using tools that are unapproved for this purpose risks data breaches, which should be reported instantly in line with the Data protection policy.

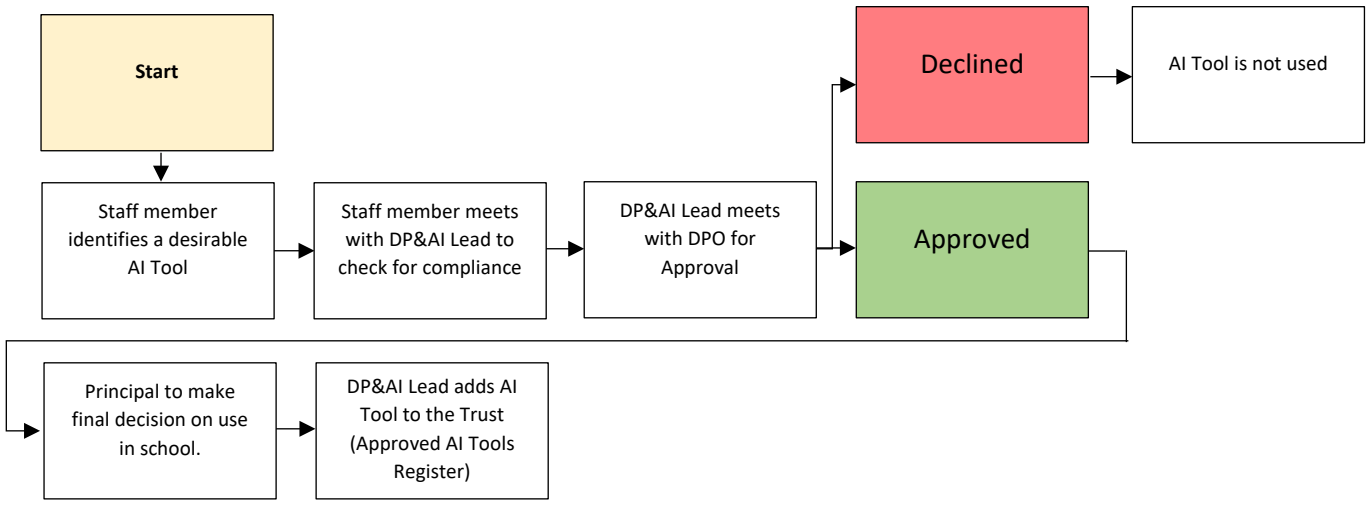
AI systems often learn and evolve based on the data provided, raising significant data protection concerns. Staff must not input any school data into AI systems that aren't secure, for example the freely available version of ChatGPT.

In compliance with the General Data Protection Regulation (GDPR), our policy states that:

- Any AI tool used within the school environment must be approved by the Trust DPO as well as going through the DPIA process.
- No sensitive student data should be input into any AI system. For example, student ethnicity, health records or special educational needs.
- All staff members are required to participate in routine data protection training, which includes best practices in handling and interacting with AI platforms.

Key Principles:

- Personal data includes names, assessment records, and anything identifiable.
- Lawful processing must have a clear basis; the most common of these are: public task, legitimate interest, or consent.
- Schools must not input personal or sensitive data into generative AI systems without approval from the AI & Data Protection Lead, and Data Protection Officer (DPO).
- AI systems must not store or learn from personal data, to avoid this only trust approved AI tools should be used, as listed on the 'Approved AI tools register'.
- Schools must ensure data retention, deletion and storage policies are adhered to.



Intellectual Property

Separate from data protection, intellectual property (IP) refers to the ownership of original work, including student work.

Requirements:

- Teachers **must not input student work** into an **unapproved AI tool** (for example ChatGPT or some free plagiarism checkers), as **the work produced may be the student's intellectual property** and **may be retained by the AI system.**
- Staff should **not share or upload copyrighted material** into AI systems **unless rights are held**.
- AI systems are trained on a range of data, some of which may be copyrighted, **we should avoid sharing widely work generated by AI.**
- The DfE acknowledge that the legal landscape is evolving around copyright and AI and suggests some mitigation measures that we must all follow:
    - You should **avoid public sharing** (such as on school websites) of any content largely created by a generative AI tool, as there is potential for the output to resemble or contain copyrighted material.
    - **Do not share** AI-generated resources widely. For example, if you **generate an image using AI**, you should **avoid placing it on your school website**.
    - Another example that **should be avoided is publishing a policy created by an AI tool** that used input from **another school's policy** without permission.

Safeguarding & Online Safety

AI creates new online safety risks: deep-fakes, impersonation, fake chatbots, inappropriate outputs. The safety of our students remains paramount. There are particular risks within the digital realm where AI is utilised. While AI can be a powerful educational tool, its misuse can lead to serious consequences.

To support SLT to mitigate these risks, there will be a series of workshops for SLT members focusing on the evolving risks of AI and mitigations that can be taken. This will include the development of an AI action plan for each school.

- Any concerning behaviour or material generated by or encountered within AI platforms must be immediately reported, following the school and trust safeguarding procedures as well as Keeping Children Safe in Education Guidance.

Teachers should:

- Consider the constantly changing safeguarding risks brought about and follow the trust safeguarding policies
- Ensure tools used with students are age-appropriate, meet the DfEs product safety expectations and are approved for use in your school.
- Follow Keeping Children Safe in Education policy and school safeguarding procedures paying particular attention to any updates with regards to safeguarding and escalate concerns promptly
- If you encounter or generate any concerning behavior or material on AI platforms, you must report it immediately according to the school's safeguarding procedures.

Academic Integrity

AI can be misused in assessments.

Teachers should:

- Follow JCQ guidance on AI use in examined assessments
- Understand that AI detection tools are usually ineffective and only approved tools should be used for this purpose, other approaches should be considered such as redesigning independent work to make it less easy to complete with AI, or including an element of verbal assessment or personal reflection.

Curriculum

Understanding AI's role, potential, and limitations in our world is crucial for students. To support this we commit to developing a curriculum that will integrate critical thinking skills and foundational knowledge about AI.

We commit to:

- Ensure that knowledge remains at the core of our curriculum to enable the critical judgment of AI-generated outputs.
- Develop opportunities within existing subjects to critically evaluate information, particularly content generated by AI, to equip students with the skills needed to discern misinformation and inaccuracies.
- Develop strands within the Computing and PSHE curriculum that addresses emerging concerns around content that could be generated by AI as part of Online Safety education and equip students with the skills needed to build healthy attitudes to AI.
- In all exams, the school will follow the JCQ guidance on AI in assessments.

Through this policy, our Trust is committed to harnessing the benefits of AI in an ethical, safe, and informed manner, preparing our students to navigate and contribute to an increasingly digital world.

Monitoring, Training and Review

The pace of AI development demands a flexible and well-informed response. Schools must stay up to date.

Requirements:

- You can expect to receive regular updates on AI by the AI & Data Protection Lead.
- Further training and guidance is available on the DfE website, co-developed by the Partnership Learning Trust.

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

- We should all work together to maintain a culture of human oversight, transparency, and critical reflection