

Three Counties Academy Trust



Safe Use of AI Policy

#CU14

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To be reviewed no later than August 31st 2026

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Common abbreviations and acronyms

AA	Admissions Authority	GIAS	Get Information about Schools
AAI	Adrenaline Auto-Injector (Epi Pen)	GPA	Government Procurement Arrangement
ACM	Asbestos Containing Materials	HASH	Herefordshire Association of Secondary Heads
AFH	Academies Financial Handbook	HBV	Honour Based Violence
AHT	Assistant Headteacher	HR	Human Resources
AIR	Attendance Intervention Reviews	H&S	Health and Safety
APIs	Application Programme Interfaces	HoS	Head of School
BAME	Black, Asian and Minority Ethnic Backgrounds	HSE	Health and Safety Executive
BCP	Business Continuity Plan	ICO	Information Commissioners Office
BFR	Budget Forecast Return	IHP	Individual Healthcare Plan
CAMHS	Child and Adolescent Mental Health Services	IRMS	Information and Records Management Society
CEO	Chief Executive Officer	IWF	Internet Watch Foundation
CFO	Chief Financial Officer	KCSIE	Keeping Children Safe in Education
CIF	Condition Improvement Fund	KS1/2/3/4	Key Stage 1/2/3/4
CIN	Child in Need	LAC	Looked After Child
CLA	Children Looked After	LADO	Local Authority Designated Officer
CMIE	Child Missing in Education	LGB	Local Governing Body
COO	Chief Operating Officer	LLC	Low-Level Concerns

COSHH	Control and Substances Hazardous to Health	LSA	Learning Support Assistants
CP	Child Protection	MASH	Multi-Agency Safeguarding Hub
CPD	Continuing Professional Development	MAT	Multi-Academy Trust
CSCS	Children's Social Care Services	MFA	Multi-Factor Authentication
CSE	Child Sexual Exploitation	MFL	Modern Foreign Language
CTIRU	Counter-Terrorism Internet Referral Unit	NCSC's	National Cyber Security Centres
CWD	Children with Disabilities	NPQEL	National Professional Qualification in Executive Leadership
DBS	Disclosure and Barring Service	PA	Persistent Absence
DDSL	Deputy Designated Safeguarding Lead	PAN	Published Admission Number
DfE	Department for Education	PECR	Privacy and Electronic Communications Regulations
DHT	Deputy Headteacher	PEP	Personal Education Plan
DSE	Display Screen Equipment	PEEP	Personal Emergency Evacuation Plan
DSL	Designated Safeguarding Lead	PEx	Permanent Exclusion
DPO	Data Protection Officer	PLAC	Previously Looked After Child
EAL	English as an Additional Language	PP	Pupil Premium
ECT	Early Career Teacher	PSHE	Personal, Social and Health Education
EHA	Early Help Assessment	PSED	Public Sector Equality Duty
EHCNA	Education, Health and Care Needs Assessment	PTFA	Parent, Teacher and Friends Association

EHCP	Education, Health and Care Plan	RHE	Relationships and Health Education
EHE	Elective Home Education	RSHE	Relationships, Sex and Health Education
ELSA	Emotional, Literacy and Support Assistant	SALT	Speech and Language Therapist
ELSI	Executive Leader for Safeguarding and Inclusion	SARC	Sexual Assault Referral Centre
ESFA	Education and Skills Funding Agency	SBM	School Business Manager
EVC	Educational Visit Coordinator	SCCs	Standard Contractual Clauses
EWO	Education Welfare Officer	SDQ	Strengths and Difficulties Questionnaire
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FGM	Female Genital Mutilation	SEND	Special Educational Needs and Disabilities
FOI	Freedom of Information	SLA's	Service Level Agreements
FSM	Free School Meals	STEM	Science, Technology, Engineering and Maths
FTS	Find a Tender Service	TA	Teaching Assistant
GAG	General Annual Grant	TCAT	Three Counties Academy Trust
GDPR	General Data Protection Regulation	VSH	Virtual School Headteacher
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations		

Statement of intent

Three Counties Academy Trust (TCAT) recognises that the use of artificial intelligence (AI) can help to positively affect teacher workload, develop pupils' intellectual capabilities and prepare them for how emerging technologies will change workplaces. While there are many benefits to the use of AI tools, the content they produce may not always be accurate, safe or appropriate, and could lead to malpractice.

Through the measures outlined in this policy, TCAT and our schools aims to ensure that AI is used effectively, safely and appropriately to deliver excellent education that prepares our pupils to contribute to society and the future workplace.

For the purposes of this policy, the following terms are defined as:

- **AI** – The theory and development of computer systems able to perform tasks normally requiring human intelligence, e.g. visual perception, speech recognition, decision-making
- **Generative AI** – A category of AI algorithms that generate new outputs based on the data they have been trained on
- **Misuse of AI** – Any use of AI which means that pupils have not independently demonstrated their own attainment

1. Legal framework

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

- Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- DfE (2024) 'Keeping children safe in education 2024'
- DfE (2025) 'Generative artificial intelligence (AI) in education'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- JCQ (2025) 'AI Use in Assessments: Your role in protecting the Integrity of qualifications'
- JCQ (2024) 'Suspected Malpractice Policies and Procedures'

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- SG43 Online Safety Policy
- FI15 Cyber-Security Policy
- FI20 Data Protection Policy
- SG1 Child Protection and Safeguarding Policy and Procedures

And the following internal documents:

- Cyber Response and Recovery Plan
- Device and Technology Acceptable Use Agreement for Pupils
- Device and Technology Acceptable Use Agreement for Staff
- Secondary Examinations Policy
- Primary Assessment Policy
- Non-examination Assessment Policy
- Exam Preparation Policy

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board are responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance
- Reviewing this policy in line with published timescales
- Ensuring their own knowledge of the use of AI tools across TCAT and our schools is up to date
- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals
- Ensuring the TCAT and our schools follow the DfE's digital and technology standards

The Executive Headteacher/CEO is required to:

- Ensuring that the use of AI tools across TCAT is integrated into relevant policies and procedures
- Working with the Trust Board to review and update this policy in line with published timescales
- Ensuring that the use of AI tools is taken into consideration when creating policies and procedures regarding online safety, child protection and safeguarding, and data protection

Headteachers/Heads of School are required to:

- Ensuring that staff receive regular, up-to-date training on how to use AI tools in their school
- Ensuring that the use of AI tools in their school is integrated into relevant policies and procedures, the curriculum and staff training.
- Communicating with parents to ensure they are kept up to date with how AI tools are being used in their school, how this will impact pupils' education and how their school is ensuring the tools are being used safely and effectively
- Ensuring that AI practices are audited and evaluated on a regular basis within their setting

TCAT's ICT Technician will be responsible for:

- Providing technical support in the development and implementation of TCAT and TCAT schools AI practices, policies and procedures

- Implementing appropriate security measures

The DPO will be responsible for:

- Keeping up-to-date and informed with AI technologies relevant to TCAT and our schools
- Understanding and maintaining awareness of what the use of AI means for data protection across TCAT
- Advising TCAT and our schools on how to integrate the use of AI while complying with data protection regulations

The DSL in each TCAT school will be responsible for:

- Taking the lead responsibility for online safety in their school
- Undertaking training so they understand the risks associated with using AI tools in their school
- Liaising with relevant members of staff on online safety matters
- Maintaining records of reported online safety concerns relating to the use of AI tools, as well as the actions taken in response to concerns
- Reporting to their Local Governing Body about the use of AI tools and how it links to safeguarding

All staff members will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies
- Taking responsibility for the security of the AI tools and data they use or have access to
- Modelling good online behaviours when using AI tools
- Maintaining a professional level of conduct in their use of AI tools
- Having an awareness of the risks that using AI tools in school poses
- Reporting concerns in line with TCAT and their school's reporting procedure
- Where relevant to their role, ensuring that the safe and effective use of AI tools is embedded in their teaching of the curriculum
- Familiarising themselves with any AI tools used by TCAT or their school and the risks they pose

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies
- Seeking help from the relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools

- Reporting concerns in line with TCAT and their school's reporting procedure
- Familiarising themselves with any AI tools used by their school and the risks they pose
- Submitting work that is demonstrably their own

3. Data protection and cyber-security

TCAT is aware of the data privacy and cyber-security implications that come with using generative AI tools and will ensure that all AI tools are used in line with our Data Protection Policy and Cyber-security Policy. TCAT and our schools will follow the procedures in these policies to continue to protect pupils from harmful online content that could be produced by AI tools.

TCAT will use data anonymisation techniques, e.g. by using pseudonyms, to ensure that any pupil data processed through AI tools for administrative purposes is not identifiable.

Data audits will be carried out on an annual basis by the DPO to ensure that AI tools are not capturing or processing personal data inadvertently.

Only authorised staff members will be permitted to use AI for data-related activities.

All staff will be made aware that generative AI tools are able to create believable content of all kinds, for example credible email scams requesting payment, and that the content AI produces may seem more authoritative and believable than usual scams. All staff will apply their best judgement and common sense to manage cyber-security risks effectively and ensure that the DfE's [cyber standards](#) are followed at all times.

TCAT and our schools will:

- Protect personal and special category data in accordance with data protection legislation
- Be aware of intellectual property (IP) implications in line with the below section
- Review and strengthen cyber security by referring to the DfE's cyber standards
- Ensure TCAT's response to cyber security breaches considers AI-specific issues, e.g. data leakage from AI-generated output
- Be mindful that generative AI could increase the sophistication and credibility of cyber attacks
- Ensure that pupils are not accessing or creating harmful or inappropriate content online, including through AI tools
- Refer to the DfE's [Filtering and monitoring standards for schools and colleges](#) to ensure that the appropriate systems are in place
- Be mindful of the data privacy implications when using AI tools and will take steps to ensure that personal and special category data is protected in accordance with data protection legislation

If it is necessary to use personal and special category data in AI tools, TCAT and our schools will ensure that the tools comply with data protection legislation and existing privacy policies to protect the data.

TCAT will be open and transparent whilst ensuring that data subjects understand their personal or special category data is being processed using AI tools.

4. Intellectual property (IP) implications

TCAT will ensure that all uses of generative AI tools adhere strictly to IP laws and best practices.

TCAT will recognise the importance of being aware of the IP implications when using these technologies and only use IP materials to train AI if explicit permission from the copyright holder has been granted, or if a statutory exception applies.

Materials created by pupils and teachers will be recognised as copyright material, provided they meet the statutory standard for copyright. This standard is considered to be low and does not depend on the quality of the work produced.

TCAT will understand that copyright law is distinct from data protection law, and any consents or data processing agreements for personal data are separate from issues of compliance with copyright legislation.

TCAT will remain mindful that many free-to-access generative AI tools may use the inputs submitted by users to further train and refine their models. In contrast, certain paid tools may allow users to opt out of their inputs being used for such purposes. TCAT will evaluate the terms of use for each AI tool through the ICT Technician and the DPO to ensure compliance with copyright and intellectual property laws.

Examples of Original Creative Work

TCAT and our schools will recognise the following as examples of original creative work that may be protected by copyright:

- Essays, homework, or any other materials written or drawn by a pupil (not including responses to multiple-choice questions, as these are less likely to constitute copyright work)
- Lesson plans created by a teacher
- Prompts entered into generative AI tools that produce substantial content

Permission to Use

TCAT and our schools will not allow or cause pupils' original work to be used to train generative AI models unless explicit permission is obtained, or an exception to copyright applies. Permission will need to be granted by:

- The pupil, as the copyright owner
- The pupil's parent or legal guardian if the pupil is unable to consent independently

TCAT and our schools will ensure that any use of pupil or teacher-created content is handled with full compliance with copyright laws. Where exceptions to copyright may apply, TCAT will seek legal advice to ensure lawful usage.

Secondary Infringement Awareness

TCAT will be vigilant in avoiding secondary infringement of intellectual property. This could occur if AI-generated products are trained on unlicensed materials and are then used in educational settings or published more widely—for example, on the TCAT website.

TCAT will acknowledge the following as potential risks associated with secondary infringement:

- Publishing a policy generated by an AI tool that used input derived from another school or college's policy without obtaining permission
- Using an image created by an AI tool that was trained on copyrighted material without the copyright holder's consent

TCAT will put measures in place to verify the intellectual property rights of any AI-generated outputs before their use in public or educational contexts.

5. Using AI tools

TCAT will ensure that AI tools are used appropriately to achieve the following aims:

- To reduce workload
- To free up teachers' time
- To assist with the production of high-quality and compliant administrative plans, policies and documents
- To support the teaching of a knowledge-rich computing curriculum

- To identify and use appropriate resources to support their education, including age-appropriate resources and preventing over-reliance on a limited number of tools or resources
- To teach pupils:
 - How to use emerging technologies safely and appropriately
 - About the limitations, reliability and potential bias of AI tools
 - How information on the internet is organised and ranked
 - How online safety practices can protect against harmful and misleading content

Whilst recognising that AI tools can be used appropriately and with benefit to teaching and learning, TCAT will keep in mind that the content produced by AI tools can be:

- Inaccurate
- Inappropriate
- Biased
- Taken out of context and without permission
- Out of date or unreliable

AI tools will not be used for educational resources without appropriate fact-checking and quality assurance measures in place.

Where AI tools are used to produce administrative plans, policies and documents, all staff members will understand that the quality and content of the final document remains the professional responsibility of the staff member who produced it. Staff members using AI tools to create documents will not assume that AI output will be comparable with a human-designed document that has been developed in the specific context of TCAT or a TCAT school.

Pupils will be made aware of the importance of referencing AI tools correctly when using AI tools to produce work, especially if the work is for an assessment, in order to allow teachers and assessors to review how AI has been used and whether it was appropriate. Pupils' references to AI sources will show the name of the AI source and the date that the content was generated.

Pupils will retain a copy of the questions and AI generated content for reference and authentication purposes in a non-editable format, e.g. a screenshot. Pupils will also provide a brief explanation of how AI tools have been used.

When using AI tools, staff and pupils will ensure that any content produced is scrutinised and cross-checked for its appropriateness and accuracy.

Staff members will be aware that AI tools return results based on the dataset it has been trained on – it may not have been trained on the national curriculum and may not provide results that are comparable with a human-designed resource developed in the context of the national curriculum. Staff members will be mindful of this in their teaching and marking of pupils' work.

Pupils and staff members will be reminded that using AI tools cannot replace the judgement and deep subject knowledge of a human expert. Staff members will stress the importance of pupils acquiring their own knowledge, expertise and intellectual capability rather than relying on AI tools in their work.

TCAT will not allow or cause pupils' original work to be used to train AI tools unless it has appropriate consent or exemption to copyright. For pupils under 18, consent will be sought via their parents.

6. Misusing AI tools

Preventing misuse

TCAT acknowledges that misuse of AI tools can happen both accidentally and intentionally, and that education and awareness is key to preventing misuse. Our schools will consider taking some or all of the following actions to prevent the misuse of AI tools:

- Restricting access to online AI tools on school devices and networks, especially on devices used for exams and assessments
- Setting reasonable deadlines for submission of work and providing pupils with regular reminders
- Allocating time for sufficient portions of pupils' work to be completed in class under direct supervision, where appropriate
- Examining intermediate stages in the production of pupils' work to ensure that work is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages
- Introducing classroom activities that use the level of knowledge and understanding achieved during lessons to ensure the teacher is confident that pupils understand the material
- Engaging pupils in verbal discussions about their work to ascertain that they understand it and that it reflects their own independent work
- Refusing to accept work that is suspected to have been generated through misuse of AI tools without further investigation
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models
- Investing in educating and training staff, pupils and parents on the use of AI tools and raising awareness of the risks and issues that come with its use

Identifying misuse

Staff members will continue to use the skills and observation techniques already in use to assure themselves that pupils' work is authentically their own when attempting to identify a misuse of AI tools.

When reviewing pupils' work to ensure its authenticity, staff members will compare it against other work created by the pupil. Where the work is made up by writing, the staff members will make note of:

- Spelling and punctuation
- Grammatical usage
- Writing style and tone
- Vocabulary
- Complexity and coherency
- General understanding and working level
- The mode of production, i.e. whether the work was handwritten or word-processed

Staff members will be aware of and look out for potential indicators of AI use, which include:

- A default use of American spelling, currency, terms and other localisations
- A default use of language or vocabulary which might not appropriate to the working or qualification level
- A lack of direct quotations and/or use of references where these are required or expected
- Inclusion of references which cannot be found or verified
- A lack of reference to events occurring after a certain date, reflecting when an AI tool's data source was compiled
- Instances of incorrect or inconsistent use of first-person and third-person perspective where AI generated text has been left unaltered
- A variation in the style of language evidenced in a piece of work, if a pupil has taken specific portions of text from an AI tool and then amended it
- A lack of graphs, data tables or visual aids where these would normally be expected
- A lack of specific, local or topical knowledge
- Content being more generic in nature
- The inadvertent inclusion of warnings or provisos produced by AI tools to highlight the limits of its ability or the hypothetical nature of its output

- The submission of pupil work in a typed format, where this is not usual, expected or required
- The unusual use of several concluding statements throughout the text, or several repetitions of an overarching essay structure within a single lengthy essay
- The inclusion of confidently incorrect statements within otherwise cohesive content
- Overly verbose or hyperbolic language that may not be in keeping with the pupil's usual style

Staff members will remain aware that AI tools can be instructed to employ different languages and levels of proficiency when generating content, and some are able to produce quotations and references.

Where necessary, TCAT and our schools will consider making use of the following programme and services that are able to analyse content and determine the likelihood that it was produced by AI:

- GPTZero

Staff members will be mindful that the above tools will give lower scores for AI-generated content which has been subsequently amended by pupils and should spend time getting to know how the detection tools work to understand their capabilities. Teachers will also use their own understanding of pupils past work to gain a holistic oversight of the authenticity of work that has been submitted.

7. Exams and assessments

AI will not be relevant for any aspect of primary school examination. Children are not required to complete assessment pieces that go towards final grades.

8. Safeguarding

TCAT acknowledges that generative AI tools can be used to produce content that is dangerous, harmful, and inappropriate. Our schools will follow the procedures set out in our Child Protection and Safeguarding Policy and Procedures and the Online Safety Policy to ensure that pupils are not able to access or be exposed to harmful content.

Pupils will be taught about the risks of using AI tools and how to use them safely. Pupils will be made aware of how to report any concerns or incidents involving generative AI, and who to talk to about any issues regarding the use of AI tools.

Our schools will engage with parents to inform them of the safeguarding risks that come with using AI tools, and how TCAT and the school is protecting pupils online. Each school will ensure that parents are aware of who to speak to about any concerns or issues regarding the use of AI.

TCAT will ensure that the appropriate filtering and monitoring systems are in place to protect pupils online, following the DfE's [filtering and monitoring standards](#).

All staff members will receive training on the safe use of AI as part of their online safety training, which is regularly updated.

9. Teaching pupils about the safe use of AI

Teaching about the safe and appropriate use of AI will ensure that pupils benefit from a knowledge-rich curriculum which enables them to become well-informed users of technology and understand its impact on society. Pupils will gain strong foundational knowledge which ensures they are developing the right skills to make the best use of AI tools.

Each TCAT school will, after allowing for the age and capacity of children:

- Prepare pupils for changing workplaces
- Teach pupils how to use emerging technologies, including AI tools, safely and appropriately
- Raise awareness of the limitations, reliability and potential bias of AI tools
- Help pupils to understand how information on the internet is organised and ranked
- Include online safety teaching in the curriculum and how to protect against harmful or misleading content
- Raise awareness and understanding of protecting intellectual property rights
- Encourage the safe and responsible use of digital content
- Teach about the impact of technology, including disruptive and enabling technologies
- Include teaching about how computers work, connect with each other, follow rules and process data in the curriculum

Pupils will be supported to identify and use appropriate resources to support their ongoing education through the use of age-appropriate resources, which may include AI tools, whilst preventing over-reliance on a limited number of tools or resources.

Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 31st August 2026.

Signed by:

_____ Executive Headteacher/CEO

Date: _____

_____ Board appointed Trustee

Date: _____