72 - Use of Artificial Intelligence (AI) Policy

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1. Introduction

Artificial Intelligence (AI) is rapidly transforming our world and presents significant opportunities to enhance teaching, learning, and administrative processes within schools. This policy sets out Minster Trust for Education's commitment to the responsible, ethical, and effective use of AI tools, aligning with the Department for Education's guidance and existing legal frameworks in England, including UK GDPR, data protection regulations, and safeguarding principles.

We believe that when used appropriately, AI can:

- Enhance academic outcomes and educational experiences for pupils.
- Support teachers in managing their workload more efficiently and effectively.
- Educate staff and pupils about safe, responsible, and ethical AI use.
- Incorporate AI as a teaching and learning tool to develop AI literacy and skills.
- Prepare staff 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.

2. Scope

This policy applies to all members of the MITRE community: staff (teaching and support), pupils, parents/carers, trustees and governors, and any third-party providers or visitors engaging with AI systems within a school's or the trust's context. It covers all forms of AI, including but not limited to, large language models (LLMs), generative AI tools (e.g., Microsoft Copilot, ChatGPT, Gemini), and AI-powered administrative software.

It refers to both open and closed generative AI tools:

- **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
- **Closed generative AI tools** are generally more secure, as external parties cannot access the data you input

3. Legislation

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)
- Generative artificial intelligence (AI) in education, 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)

4. Guiding Principles for AI Use

Our approach to AI will be guided by the following principles:

- **Human Oversight and Professional Judgement:** AI tools are designed to augment, not replace, human intelligence and professional judgement. All AI-generated outputs must be critically reviewed, verified for accuracy, and adapted by a human before being used or shared. The final responsibility for any content or decision rests with the human user.
- **Safety and Safeguarding:** The safety and well-being of our pupils are paramount. AI tools must not expose pupils to inappropriate, biased, or harmful content. Specific attention will be paid to age restrictions of AI tools and appropriate supervision when pupils are using AI.
- **Data Protection and Privacy:** All use of AI will comply with the UK GDPR and Data Protection Act 2018. Personally identifiable information or sensitive data will not be inputted into public AI models unless a specific, secure, and compliant enterprise solution has been thoroughly vetted and approved by the school's Data Protection Officer (DPO). Transparency about how data is processed by AI tools will be maintained.
- **Transparency and Accountability:** We will be transparent about where and how AI is used within the trust and its schools. Where AI has significantly influenced content (e.g., a lesson plan, resource, or report), it should be acknowledged. Clear reporting channels will be in place for any AI-related incidents or concerns.
- **Ethical Use and Bias Awareness:** We are committed to using AI fairly and responsibly, mitigating against bias and discrimination in AI outputs. Staff and pupils will be educated on the potential for bias in AI and how to critically evaluate AI-generated information.
- **Academic Integrity and Intellectual Property:** Pupils must understand that work submitted for assessment must be their own. The misuse of AI to plagiarise or misrepresent work will be treated as academic dishonesty. The school will respect intellectual property rights and ensure AI use does not infringe copyright. Pupils' original work will not be used to train generative AI models without appropriate consent.
- **Purposeful and Pedagogical Integration:** AI will be integrated thoughtfully to support defined educational objectives and reduce workload, rather than for its own sake. Its use should enhance learning experiences and administrative efficiency.
- **Continuous Learning and Adaptability:** Given the rapid evolution of AI, this policy will be regularly reviewed and updated. The school community will engage in ongoing learning and discussion about AI's potential and challenges.

5. Roles and Responsibilities

- **Trust Board:** Responsible for approving and overseeing the implementation of this AI policy, ensuring it aligns with the trust's vision, values, and legal obligations. The risk and audit committee will take responsibility for the ongoing monitoring of the implementation of this policy.
- **Trust Leaders:** Responsible for developing this policy and its regular review so that it remains contemporary. Provision of ongoing training for the use of AI by staff in schools and ensuring schools are complying with the policy, including carefully assessing benefits and risks of AI tools before deployment.
- **Head Teachers:** Responsible for implementing this policy. This includes identifying appropriate AI tools, assessing benefits and risks before deployment, liaison with the trust ICT lead for approval, allocating resources for school-level training, and ensuring compliance across the school. Head Teachers will ensure pupils understand permissible use of AI and are taught about it. A **designated AI Lead** will coordinate AI initiatives.
- **Trust IT Lead:** Responsible for advising on data protection implications of AI tools and approving their use following risk assessment.

- **School Data Protection Officer**: Undertake data protection impact assessments for the use of AI at school level, where this is deemed necessary. Respond to any breaches or concerns resulting from the inappropriate use of AI in school.
- **Designated Safeguarding Lead (DSL):** Responsible for overseeing the safeguarding implications of AI use, particularly regarding pupil safety and online harms. This will include having in place appropriate filtering and monitoring systems.
- **Teaching Staff:**
- To understand and adhere to this policy.
- To critically evaluate all AI-generated content for accuracy, bias, and appropriateness.
- To use approved AI tools for professional purposes (e.g. lesson planning, resource creation, administrative tasks, generating formative assessment ideas, supporting marking).
- To educate pupils on the responsible and ethical use of AI, including AI literacy, critical thinking, and the risks of plagiarism and misinformation.
- To model responsible AI behaviour and be transparent about AI assistance when appropriate, including attribution.
- To report any concerns or incidents related to AI use.
- **Support Staff:**
- To understand and adhere to this policy.
- To use approved AI tools for administrative and operational tasks (e.g., drafting communications, data analysis, timetabling).
- To report any concerns or incidents related to AI use.
- **Pupils:**
- To understand and adhere to this policy regarding AI use in their learning.
- To understand what constitutes academic dishonesty and plagiarism in the context of AI.
- To critically evaluate information, including that generated by AI tools.
- To seek clarification from teachers when unsure about appropriate AI use.
- To report any concerns they have about AI.
- **Parents/Carers:**
- To be informed about the school's approach to AI and its use in education.
- To encourage responsible and ethical digital citizenship at home.
- To raise any concerns or questions about AI use in school with appropriate staff members.

6. Permitted and Prohibited Uses of AI

6.1. Staff Use of AI (Leadership, Teaching and Administrative)

Permitted:

- **Lesson Planning & Resource Creation:** Generating ideas for lesson content, creating differentiated learning materials, drafting quizzes or formative assessments, developing slide decks, knowledge organisers, and infographics.
- **Administrative Tasks:** Drafting emails, letters, reports, policy documents, timetables, and support for data analysis.
- **Feedback & Assessment (Formative):** Generating ideas for feedback, summarising marking data, providing preliminary suggestions for improvement (always requiring human review and adaptation). **AI should not be used for summative assessment or grading without explicit, robust, and DPO-approved safeguards.**
- **Differentiation & SEND Support:** Adapting materials to individual learning needs, generating personalised instructions or examples (in consultation with SENCO and EHCPs where applicable).
- **Professional Development:** Exploring AI tools for personal learning and professional growth, within the bounds of data protection and ethical guidelines.

Prohibited:

- Inputting any sensitive or personally identifiable pupil or staff data into any open AI tools, or any unapproved closed AI tools.Using AI as the sole basis for decisions affecting pupils or staff. AI systems must not be used to independently determine grades, disciplinary outcomes, safeguarding actions, attendance interventions, SEND provision, admissions decisions, exclusions, or employment-related decisions. Any AI-supported recommendation must be reviewed and authorised by an appropriately qualified member of staff who retains full accountability for the decision.
- Using AI to generate content that infringes on copyright or intellectual property rights. This includes the work of pupils being uploaded to be used to train generative AI models without appropriate consent or exemption to copyright.
- Relying solely on AI outputs without critical review, verification, and adaptation.
- Using AI to create or disseminate inappropriate, biased, or harmful content.
- Sharing AI outputs without acknowledging AI assistance where appropriate.
- Using AI for marking or providing feedback on summative assessments unless explicitly approved through a robust, secure, and compliant system with clear human oversight.

6.2. Pupil Use of AI

The Trust recognises the importance of educating pupils about AI and preparing them for a future in which AI is increasingly integrated into education, work, and wider society. AI can support learning when used appropriately, ethically, and under clear guidance.

The level and nature of permitted pupil use of AI will vary according to age, subject, task, and learning objective, and will always take place under teacher supervision and direction.

General Principles

- Pupils will be taught AI literacy, including an age-appropriate understanding of how AI systems work, their limitations, potential inaccuracies, bias, and ethical considerations.
- AI may be used to support and enhance learning, but must not replace independent thinking, creativity, or skill development.
- Pupils must be open and transparent about their use of AI. Where AI tools have been used, pupils may be required to provide a brief explanation of how the tool supported their work and what learning was completed independently.
- Expectations regarding AI use will be clearly communicated for each task or assessment, including where AI use is not permitted.
- Age restrictions set by AI tool providers (e.g. many generative AI tools being restricted to users aged 18 and over) will be strictly adhered to.
- AI use must not disadvantage pupils who have limited access to technology outside of school.

Permitted Use (under specific teacher guidance)

- Idea Generation and Brainstorming: Using AI to generate initial ideas, prompts, outlines, or mind maps. Pupils must then develop, refine, and complete the work independently.
- Research Support (with critical evaluation): Using AI as a starting point to locate information or identify key concepts, while being taught to verify accuracy through reputable and authoritative sources.

- Learning Support and Practice: Using AI-powered educational tools to support revision, personalised practice, or clarification of concepts, where these tools are provided and monitored by the school.
- Developing AI Literacy: Participating in structured learning activities designed to explore how AI works, its benefits and limitations, and its ethical implications.

Academic Integrity

- The use of AI in assessments, homework, and coursework will be clearly defined by teachers in advance. Where independent work is required, AI use may be restricted or prohibited.
- Pupils must not present AI-generated content as their own original work where this undermines the purpose of the task or assessment.

To support consistent and fair judgements about academic integrity, staff will use the following four-part framework when evaluating pupil use of AI:

1. **Compliance:** Does the use of AI comply with the rules and expectations set for the task or assessment?
2. **Transparency**: Has the pupil clearly declared and explained how AI was used?
3. **Contribution**: What independent thinking, decision-making, and learning has the pupil demonstrated themselves?
4. **Purpose**: Is the use of AI supporting and enhancing learning, or replacing the intended learning process?

Misuse of AI, including breaches of academic integrity, will be addressed proportionately and in line with Trust and school policies.

Safeguarding and Responsible Use

- Pupils must not input personal, sensitive, or identifiable information about themselves or others into AI tools.
- Pupils will be taught that AI systems can generate inaccurate, misleading, or harmful content and should not be relied upon for personal, medical, or emotional advice.
- Pupils will be taught to recognise AI-generated and synthetic media, including deepfakes, manipulated images and misinformation.
- AI must not be used to create, access, or promote inappropriate, biased, discriminatory, or harmful content.

Prohibited Use

- Using AI to cheat on assessments, homework, or coursework.
- Submitting AI-generated content as their own work without appropriate acknowledgement, or where independent thought is required.
- Using AI tools in ways that conflict with teacher instructions or task expectations.
- Using AI tools which have been prohibited.
- Inputting personal or sensitive data into AI systems.
- Using AI to generate or seek content that is inappropriate, unsafe, or harmful.

Any misuse of AI will be addressed proportionately and in line with existing Trust and school policies.

7. Data Protection and Cybersecurity

AI tools will be reviewed by the IT team on an ongoing basis and will be categorised as:

- Preferred : these should be used as a first preference by staff and offer the highest levels of security and control for the trust.
- Acceptable : Having been reviewed, these tools present a slightly elevated risk (they may be Open AI) but they are acceptable to use assuming adherence to all aspects of this policy.
- Prohibited : These AI tools must not be used for professional purposes in any circumstances.

It is understood that other tools may be used that have not been reviewed by the Trust. If staff are unsure whether to use a tool, they should avoid use or ask for a review. If other unlisted tools are used for professional purposes it is the member of staff's responsibility to ensure that all aspects of this policy are being followed.

Where personal data is being processed by an AI system a DPIA will be completed.

A catalogue of reviewed AI tools for use in a school/work context will be maintained and published.

Data Minimisation: Where personal data is used with AI, it will be minimised and anonymised where possible. Personal data will not be inputted into an AI tool unless it has been subject to a DPIA.
Vendor Agreements: The school will ensure that any third-party AI providers adhere to UK data protection laws and have robust security measures in place. Terms and conditions will be carefully reviewed, particularly regarding how input data is used for model training.
Cybersecurity: AI systems will be assessed for their cybersecurity as part of the review process.

8. Training and Professional Development

The trust is committed to providing ongoing training and professional development for all staff on:

- The capabilities and limitations of AI.
- The ethical considerations and potential biases of AI.
- Safe, responsible, and effective use of AI tools.
- Integrating AI into teaching and learning practices.
- Data protection and safeguarding considerations when using AI.
- Pupils will receive age-appropriate education on AI literacy, critical thinking, and responsible online behaviour.

9. Monitoring, Review, and Incident Reporting

- This policy will be reviewed at least annually, or more frequently as AI technology evolves and new guidance emerges from the Department for Education, ICO, or other relevant bodies.
- Trust leaders and the Trust IT Lead will regularly monitor the implementation of this policy and its effectiveness in close partnership with Head Teachers and individual schools.
- Any suspected misuse of AI, data breaches related to AI, or instances of inappropriate AI outputs must be reported immediately to the Head Teacher of the relevant school or to the CEO if the incident relates to a member of the central team.

10. Breach of this policy

Any breach of this policy will be dealt with in line with the trust's disciplinary policy (for staff), Trustee and governor code of conduct and terms of reference (for governors) and behaviour policies (for

students). Where concerns relate to safeguarding or to data protection, the relevant policies will also be considered.

11. Communication with Stakeholders

- This policy will be made accessible to all staff, pupils, and parents/carers.
- The school will proactively engage with parents/carers through newsletters, website updates, and informational sessions to explain the school's approach to AI and address any concerns.
- Open discussions about AI will be encouraged within the school community to foster a culture of understanding and responsible innovation.

Linked policies:

- Child protection/safeguarding policy
- Assessment policy
- Exams policy
- Homework policy
- Behaviour policy
- Employee code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy

Appendix A: Definitions

- **Artificial Intelligence (AI):** A broad field of computer science that enables machines to perform tasks that typically require human intelligence, such as learning, problem-solving, and decision-making.
- **Generative AI:** A type of AI that can generate new content, such as text, images, audio, or code, based on patterns learned from vast datasets (e.g., ChatGPT, Gemini).
- **Large Language Model (LLM):** A type of generative AI specifically designed to understand and generate human language.
- **Plagiarism:** Presenting someone else's work or ideas as your own, without proper attribution. In the context of AI, this includes submitting AI-generated content as original work without acknowledging AI assistance where required.
- **Hallucination:** A term used to describe instances where an AI model generates inaccurate, nonsensical, or fabricated information, presenting it as factual.

MITRE is committed to embracing the opportunities that AI presents while ensuring its safe, ethical, and responsible integration into our educational environment.

Attribution

Drafted with aspects generated by Google Gemini and Microsoft CoPilot. This policy has been further edited to ensure accuracy and purpose. The ethos and mission of Minster Trust for Education has been carefully considered when creating this policy.