



Artificial Intelligence (AI) Use Policy

DRAFT v.1.3 – 28/01/25

Example

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Introduction

Artificial Intelligence (AI) is a rapidly evolving technology that has significant potential for both positive and negative impact, in education and wider society. Generative Artificial Intelligence (GenAI) is a relatively new form of AI that has captured the imagination of the general population and commercial enterprises. Therefore, society is experiencing rapid growth in its use as an easy to access, easy to engage with, 'in your pocket' technology available on smart mobile phone, tablets, laptops, and desk-top computers, and it is likely that more types of devices will enhance access to such tools in the near future.

This rapid evolution of AI means policies and guidance will need to continue to be developed, refined and updated to reflect emerging functionality and trends. This is highly challenging, and users of AI need to be prepared to reflect carefully on how they use AI in line with the principles set out here in such new contexts.

In education, AI presents opportunities to reduce workload for the school and trust workforce, to enhance personalised learning, support professional development, and more. It also increases the chance that students will overly use AI, particularly Generative AI, to complete their schoolwork and assessments, and more. There are also safeguarding risks schools and trusts need to be mindful of. The focus of the use of AI shouldn't be the model itself. Drivers such as workload reduction with compromising quality but supported by AI are the more effective.

This Artificial Intelligence (AI) Policy should be read and considered alongside other school and trust policies and guidance, including:

- Code of Conduct
- Data Protection Policy
- Data Breach Notification Policy
- Data and E-Security Breach Prevention Policy
- Disciplinary Policy & Procedure
- E-Safety Policy
- ICT Acceptable Use Policy
- Cyber Response Policy
- Safeguarding Policy
- Other policies introduced relevant to AI.

In addition, the Trust has published Acceptable Use Guidance which should be considered alongside this Policy. Exceed Academies Trust staff can access AI-specific guidance and resources via the Trust website: www.exceedacademiestrust.co.uk/ai.

National policy and guidance should also be read alongside this policy, including:

- Department for Education (DfE) Generative Artificial Intelligence Guidance
- Joint Council for Qualification (JCQ) AI Use in Assessments: Protecting the Integrity of Assessments
- Information Commissioner's Office (ICO) Guidance on AI and Data Protection
- Keeping Children Safe in Education
- Ofsted's Approach to Artificial Intelligence
- Other guidance and policies introduced relevant to AI.

Scope

This policy applies to all staff, students/students/young people, and stakeholders within the Trust who engage with AI technologies in any capacity.

Principles

Any use of AI must follow the Trust's vision and values, strategic plan or the Trust's collective consistencies.

Whether directly, or indirectly, the overarching goal of AI is to assist students in achieving educational goals and improve outcomes. This may be through workload reduction or teacher time saving techniques for example, or through Trust agreed third party software.

The Trust is committed to the ethical use of Artificial Intelligence (AI) to enhance learning and administrative processes. The Trust and schools must prioritise transparency, fairness, and accountability in all AI applications. AI tools will be used to support educational goals while respecting the privacy and rights of all students and staff. We must ensure that AI systems are designed and implemented to avoid bias, promote inclusivity, and uphold the highest standards of integrity and responsibility.

AI must never replace human judgment; it should enhance knowledge and decision making. Equally, the loss of human interaction is a risk that should be mitigated in an organisation, profession and sector that is built on human relationships.

Exceed Academies Trust encourages the careful and considerate use of Artificial Intelligence (AI) but advises using Generative AI cautiously. Users must adhere to this guidance and policy, other related school and trust policies, and that provided in national guidance and policies. Users must be familiar with and adhere to all related policies applicable to the use of AI. Appendix B provides some example staff uses with guidance.

Staff should access AI-related training provided by the Trust, school, and/or other relevant providers based on the need of their school or organisation.

Data protection is everyone's responsibility. Under no circumstances should personal or identifying information about staff, students or other individuals be entered into any AI system without prior agreement from the Data Protection Officer (DPO). In these circumstances, a Data Protection Impact Assessment (DPIA) will be carried out to ensure that appropriate levels of data and cyber security are present to protect personal information.

Under no circumstances should sensitive or personal information or data, in any format or media, be uploaded to or shared with premium paid-for or free-to-use Generative AI models that do not have commercial data protection outside of Trust's closed infrastructure, and where it is not stored in data centres compliant under GDPR.

If personal or sensitive data is to be used with Generative Artificial Intelligence, the user must have an active and paid for Microsoft Copilot Pro with commercial data protection license associated with their work Microsoft 365 account provided, funded and managed by their school/organisation and/or the trust. Microsoft Copilot Pro is the Trust's solution.

Incidents of inappropriate use of Generative Artificial Intelligence, including the use of personal and/or sensitive data, will be dealt with in line with relevant school and Trust Data Protection

policies/procedures and, if necessary, associated Human Resources policies and procedures including the Disciplinary Policy & Procedure.

Generative AI may present plausible information that is: inaccurate; inappropriate; biased; reinforces stereotypes; taken out of context and without permission; misinformation; and out of date; and unreliable. Hallucinations occur when AI detects patterns or objects that don't exist, leading to outputs that are incorrect or meaningless. Users should only use information if they are qualified to verify its accuracy. Users must quality assure the output before deciding to use it.

Staff must not allow or cause intellectual property, including students' work, to be used to train Generative AI models, without appropriate consent or exemption to copyright. Students' work should not be used to train Generative AI without written parental consent (if the student is aged under 18) or written consent from the student (if aged 18 or over).

Staff, students and related stakeholders administering or undertaking assessments, including GCSE and A-level, should be informed about JCQ regulations and requirements at an appropriate time.

To prepare students to contribute to society and the future workplace, students should be educated about appropriate use, benefits, risks, and mitigations associated with AI, including Generative Artificial Intelligence. Students must understand the consequences of the misuse of AI or unethical behaviour. Students do not necessarily need direct access to AI for these purposes.

User age restrictions vary between models and must be adhered to. Most are age 18+, some 16+ or 13+.

Written parental consent is required for students aged over the minimum age restriction for the Generative AI model but under 18 years of age to use Generative AI tools in schools. The use of Generative AI models by students is not encouraged. Exceed Academies Trust primarily sees Generative AI models as a tool for staff. Appendix A provides some example staff uses with guidance.

Staff should report any misuse of AI to the ICT Support Team/Headteacher. Students should report misuse to their teacher.

Misuse of AI is defined as any action or use of AI that does not comply with academy and/or Trust policies, including this policy, or the use of AI for any unethical or immoral purpose. The Trust will ensure that staff and students understand the consequences of misuse of AI or unethical behaviour.

If an external individual wishes to raise a complaint about the use of AI, this would need to be raised in line with the Exceed Academies Trust Complaints Policy & Procedure.

Regular updates will be communicated to staff and pupils when applicable, acknowledging that AI is a developing technology.

Staff and pupils should have sufficient knowledge and guidance to ensure that they can recognise where AI is useful, and when AI is counterproductive.

Review

This policy will be reviewed regularly to ensure it remains relevant and effective in the face of technological advances and changing educational needs.

Example

National Guidance

A brief summary of and/or link to some of the key considerations are provided below. Users must consider the full guidance.

Keeping Children Safe in Education (KCSIE)

KCSIE states:

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues.

DfE (Department for Education) states:

[Schools and colleges should] ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through Generative AI - keeping children safe in education provides schools and colleges with information on:

- *what they need to do to protect students and students online*
- *how they can limit children's exposure to risks from the school's or college's IT system*

KCSIE is available here:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Department for Education (DfE) Generative AI in Education

DfE guidance is available here:

<https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

Ofsted's approach to artificial intelligence (AI)

Ofsted states:

Ofsted will not directly inspect the quality of AI tools. It is through their application that they affect areas of provision and outcomes such as safeguarding and the quality of education. Leaders, therefore, are responsible for ensuring that the use of AI does not have a detrimental effect on those outcomes, the quality of their provision or decisions they take.

Ofsted supports the use of AI by providers where it improves the care and education of children and learners. We recognise that these tools can help providers make better-informed decisions, reduce workload and lead to innovative ways of working.

Regulatory principle	Providers are expected to...
Safety, security, and robustness	Assure themselves that AI solutions are secure and safe for users and protect users' data. Ensure they can identify and rectify bias or error.
Appropriate transparency and explainability	Be transparent about their use of AI, and make sure they understand the suggestions it makes.

Fairness	Only use AI solutions that are ethically appropriate – in particular, we expect providers to consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.
Accountability and governance	Ensure that providers and their staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance, and use of AI.
Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology. Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.

Ofsted's guidance is available here:

<https://www.gov.uk/government/publications/ofsteds-approach-to-ai>

Joint Council for Qualification (JCQ) AI Use in Assessments: Protecting the Integrity of Assessments

<https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/>

Information Commissioner's Office (ICO) Guidance on AI and Data Protection

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/>

Example

Trust Acceptable Use Guidance and Resources

Exceed Academies Trust has created a range of guidance and resources. These are available at www.exceedacademiestrust.co.uk/ai.

Example

Information for parents and carers

At Exceed Academies Trust, we are dedicated to giving your child(ren) the best education possible. We also care about our teachers and staff, helping them to do their best for our schools and communities.

We are using technology called Artificial Intelligence (AI) to help us. This includes Generative AI tools like ChatGPT and Microsoft Copilot and Machine Learning educational resources. Our teachers and staff are learning how to use these tools to make learning even better for your child(ren) or to reduce their workload so they can focus more on what happens in the classroom. We have groups of school leaders, teachers, and support staff working together to understand how AI can help and what we need to be careful about. We have also created training programmes and guides for our staff.

Generative AI tools have age limits, usually 13+, 16+, or 18+. If your child is old enough to use these tools but under 18, we will need your permission. Our staff know not to share your child's important work with AI tools that don't protect their data. We are also working towards teaching students about AI to prepare them for the future and introducing carefully selected AI educational resources into lessons.

When our staff uses Generative AI, they do not share personal information like names or birthdays. They use AI to help create lesson plans, classroom resources, and reports without sharing personal data. If we use any personal data with other AI resources, it is done safely with tools with data protection features and staff follow all our data protection rules.

Example

Appendix A – Example Staff Responsible Use

Item	Responsible Use Case	Guidance
Transforming students work	Convert a short (1-2 sentences) of a student's writing to an image that represents the fictional story.	Teacher inputs the extract into Generative AI, turns off the data projector, quality assures the image, then shared with the student.
Lesson planning and resource creation	Generate lesson plan, slides and resources.	Engage with Copilot to draft then refine the lesson plan via AI and own editing. Quality assure the lesson plan. Use Aila (Oak National Academy) and quality assure the outcome. Create slides in Canva via an education license and quality assure the slides/resources.
Documentation	Summarise research or a report.	Attached the report to Copilot and ask it to summarise the research/report. Quality assure the outcomes by cross-referencing key elements with the original research/report.
Management Information	Generate letters and emails using Ask Arbor with the Arbor Management Information System (MIS).	Arbor is a secure data environment and is GDPR compliant. The data does not train the underlying AI model. A DPIA has been undertaken.

Appendix B – Example Student Responsible Use

Item	Responsible Use Case	Guidance
Personalised Learning	To learn through adaptive approaches.	Use commercial products commissioned by the school following a DPIA.
Introducing AI to students	Demonstrate that AI collects, stores and uses data inputted into it.	Use Google's Quick Draw! For students to draw items and then discuss how it uses the drawings of over 50 million entries to create 'typical' images that users draw. But no personal or sensitive data has been shared.