



A collaboration of schools which enhances the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school

Use of artificial intelligence (AI) policy

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| Author: | Lead Governance Professional |
| Approver: | Curriculum Committee |
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Contents

| | |
|---|----|
| Contents | 2 |
| 1. Aims and scope..... | 2 |
| 2. Legislation..... | 3 |
| 3. Regulatory principles..... | 3 |
| 4. Roles and responsibilities | 4 |
| 5. Staff and governors use of AI | 6 |
| 6. Educating pupils about AI | 8 |
| 7. Use of AI by pupils | 8 |
| 8. Formal assessments..... | 9 |
| 9. Staff training | 8 |
| 10. Referral to our child protection and safeguarding policy..... | 9 |
| 11. Breach of this policy | 10 |
| 12. Monitoring and transparency..... | 10 |
| 13. Links with other policies | 10 |

1. Aims and scope

At Agape Multi Academy Trust (the Trust) we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation.

As a Trust, we are committed to using AI as a resource to enable the flourishing of every individual in our community. We believe that the responsible use of technology should serve our values, enhancing our schools' ability to unlock the potential in every child and adult so they can thrive.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations. Therefore, the aim of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole Trust community.

This policy covers the use of AI tools by trust and school staff, trustees, governors, students and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

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, students 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, students and pupils

- Protect the privacy and personal data of staff, trustees, governors, parents/carers, students and pupils in compliance with the UK GDPR

1.1 Definitions

This policy refers to both ‘open’ and ‘closed’ generative AI tools. These are defined as follows:

- **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

2. Legislation

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

- [AI regulation white paper](#), published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence
- [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 \(DPA 2018\)](#)

3. Regulatory principles

We follow the 5 principles set out in the [AI regulation white paper](#).

| REGULATORY PRINCIPLE | WE WILL ... |
|---|---|
| Safety, security and robustness | <ul style="list-style-type: none"> • Ensure that AI solutions are secure and safe for users and protect users’ data • Ensure users can identify and rectify bias or error • Anticipate threats such as hacking |
| Appropriate transparency and explainability | <ul style="list-style-type: none"> • Be transparent about our use of AI, and make sure we understand the suggestions it makes |

| REGULATORY PRINCIPLE | WE WILL ... |
|-------------------------------|--|
| Fairness | <ul style="list-style-type: none"> • Only use AI solutions that are ethically appropriate and equitable. We will acknowledge and minimise prejudice and bias – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate |
| Accountability and governance | <ul style="list-style-type: none"> • Ensure that the Trust Board, our governors and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI |
| Contestability and redress | <ul style="list-style-type: none"> • 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 |

4. Roles and responsibilities

4.0 AI Lead

Our generative AI Lead is David Smee. They are responsible for the day-to-day leadership, ownership and management of AI use in the school.

4.1 Trust Board

The Trust Board will:

- Take overall responsibility for monitoring this policy and holding the headteachers to account for its implementation in line with the Trust's AI strategy
- Ensure the Headteachers and AI lead 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:
- Seek advice from the Data Protection Officers / IT Managers/ AI leads and the designated safeguarding leads, as appropriate
- Review this AI policy as appropriate, and at least annually

4.2 Headteachers & AI Leads

Our Headteachers and AI Leads will:

- Liaise with their data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation

- Liaise with their DSL to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the Trust's child protection and safeguarding policy
- Ensure that the guidance set out in this policy is followed by all staff
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure students and pupils are taught about the effective use and potential risks of AI
- Sign off on approved uses of AI taking into account advice from the DPO, and data protection impact assessments
- Review this AI policy at least annually recommending any changes to the Central Trust Team

4.3 Data protection officer (DPO)

Our data protection officers (DPO's) are responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO's are:

For Altwood School: Satswana Services, Suite G12 Ferneberga House, Alexandra Road, Farnborough, Hampshire, GU14 6DQ. Email: admin@satswana.com Telephone: 01252 759177. Enquiries and requests should be sent in the first instance to Mrs N. Walker, Headteacher's PA, Altwood School, Altwood Road, Maidenhead, Berkshire, SL6 4PN nwalker@altwoodschool.co.uk

For The Piggott School: Mr David Thatcher, The Piggott School, Twyford Road, Wargrave, Berkshire, RG10 8DS. Email: dpo@piggottschool.org Telephone: 01189 402357

For The Agape Multi Academy Trust: Mrs Rebecca Marr Agape Multi Academy Trust, C/O The Piggott School, Twyford Road, Wargrave, Berkshire, RG10 8DS. Email: MarrR@agapetrust.co.uk Telephone: 01189 402357

4.4 Designated safeguarding lead (DSL)

Our DSL's 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 Trust's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices

Our DSL's are:

For Altwood School: Mr Gary Goodman Altwood@altwoodschool.co.uk 01628 622236

For The Piggott School (Secondary phase) Miss Lucy Reynolds Safeguarding@piggottschool.org 01189 402357

For the Piggott School (Primary phase) Mrs Claire Waite Safeguarding@piggottschool.org 01189 320033

4.5 All staff

As part of our aim to reduce staff workload while improving outcomes for our students and pupils, we encourage staff to explore opportunities to meet these objectives through the use of 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:

- Seek advice from their data protection officer / IT Manager/ AI lead, as appropriate
- Report safeguarding concerns to the DSL in line with our child protection and safeguarding policy
- Acknowledge whether they are using either open or closed generative AI tool and have planned how to mitigate risks of the model's use
- 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 our students and pupils understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

4.6 Students and Pupils

Students and Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

5. Staff, trustees and governors' use of AI

5.1 Approved use of AI

We are committed to helping staff, trustees and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete but cannot replace the judgement and knowledge of a human expert.

Whatever tools or resources are used to produce plans, policies or documents, the quality and content of the final document remains the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff, trustee or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, trustees or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it.

A note on your data security in KeyGPT: This is The Key's AI-powered assistant for schools, included in our membership. KeyGPT is a closed generative AI tool, which uses published content from The Key to improve the quality of its response, known as retrieval augmented generation (RAG). The Key has prompted the AI to give the users more complete, specific responses, and instruct the AI to limit bias as much as possible. However, all AI models can make mistakes, so do check any important information KeyGPT gives you.

5.2 Process for approval

Staff, trustees and governors are welcome to suggest new ways of using AI to improve student and pupil outcomes and reduce workload.

Staff should contact their AI Lead to discuss any ideas they may have with regards to using AI. The AI Lead will develop the idea (including implementation method and plausibility) with possibly trialling it, before discussing with the Headteacher.

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

Trustees and governors should contact the Lead Governance Professional to discuss any ideas they may have with regards to using AI. The CEO is responsible for signing off on approved uses of AI taking into account advice from the AI lead, 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 AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, the Trust or school, as relevant, will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Our data protection policy can be found on our website or by clicking this link [Policies](#). Please also refer to section 10 of this policy.

5.4 Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Students and pupils own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

Student and pupils' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.5 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, students or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure. Please refer to our website for our complaints policy or click on this link: [Policies](#)

5.6 Raising concerns

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

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

5.7 Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our schools' equality policies when using generative AI tools
- 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

Students, staff, trustees and governors must not:

- Generate content to impersonate, bully or harass another person
- Generate or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils/students
- Input offensive, discriminatory or inappropriate content as a prompt

6. Staff training

Schools will provide training to staff on the appropriate safe usage of AI, methods to use AI to support students learning more effectively and to help shift staff workload to be more student focused.

7. Educating pupils about AI

We acknowledge that our students and 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 students and pupils develop the right skills to make the best use of generative AI.

We educate our students and pupils about AI throughout our curriculum, while also covering subjects such as:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

8. Use of AI by students and pupils

We recognise that AI has many uses to help our students and pupils learn.

Our students and pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images
- When a teacher has expressly permitted this

All AI-generated content must be properly attributed and appropriate for the student and pupils' age and educational needs. Some AI tools stipulate a minimum age that the user must be. Where this is the case the tool will only be permitted for students and pupils above the minimum age.

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, students and pupils should reference their use of AI. The reference must show the name of the AI source and the date the content was generated.

We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our behaviour policy, IT & acceptable usage policy, online safety, exams policy and/or non-exam assessment policy as appropriate.

AI may also lend itself to cheating and plagiarism. To mitigate this, students and pupils may not use AI tools:

- During assessments, including internal and external assessments, and coursework
- To write their homework or class assignments, where AI-generated text is presented as their own work
- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations)

We are committed to upholding academic integrity. Schools will use tools and other techniques to identify the use of AI in assessed work, where possible.

9. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our exams and non-exam assessment policies for more details.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on [AI use in assessments](#).

10. Referral to our child protection and safeguarding policy

The Trust 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 a DSL immediately.

Any such incident will be dealt with according to the procedures set out in our child protection and safeguarding policy and child protection referral process. Please refer to our schools' websites for their respective 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

You must report any breach of this policy, either by you or by another member of staff, to your Headteacher immediately.

11.2 By trustees and governors

Trustees or governors found in breach of this policy will be dealt with in accordance with our Articles of Association, trustee/governor code of conduct and/or procedures for suspending or removing a member, trustee or governor.

11.3 By students and pupils

Any breach of this policy by a student or pupil will be dealt with in line with our behaviour policy, exam policy, non-exam assessment policy, IT and acceptable use policy online/E-safety policy and, if appropriate, our child protection and safeguarding policy.

12. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that will be kept updated by the Curriculum Committee whenever there is a significant change to either AI use by the trust or one of its schools or the associated risks of AI usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

All staff, trustees and governors are expected to read and follow this policy.

We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from students/pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

13. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Child protection and safeguarding policy
- Exams policy

- Non-exam assessment policy
- Behaviour policy
- Staff code of conduct
- IT & acceptable use policy
- Online (e)safety policy
- Equality policy