



# Use of Artificial Intelligence (AI) Policy

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## REVIEW HISTORY

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## **Purpose**

This policy sets out how AI may be used safely, legally and ethically across Oak Multi Academy Trust, with a focus on education, privacy, and safeguarding. Whilst we are aware AI has the potential to enhance teaching and learning, we also recognise the risks and importance of protecting individuals' privacy.

Therefore, this policy establishes clear guidelines to using AI systems responsibly, in line with data protection laws (including UK GDPR), and with consideration for the rights and well-being of all students, staff, and stakeholders. Adherence to this policy is crucial for safeguarding all stakeholders, protecting data and upholding professional standards.

## **Scope**

The policy applies to all stakeholders including staff (permanent and temporary), trustees and governors, volunteers, work experience placements, parents/carers and students, and third-party providers who use or engage with AI technologies within the school or MAT environment in any capacity or context.

Example contexts are listed below:

- Preparation of Teaching Resources
- Automating Reports and Data
- Students using AI to complete assigned work

## **UK GDPR and Data Protection Compliance (see also Appendix A)**

### i. Data Minimisation

The data shared with any AI system will be limited to what is necessary for the stated educational or administrative purpose. In order to monitor this, the trust will conduct regular audits of the data processed by AI tools to ensure compliance with this principle. For example, if an AI tool is used to analyse student performance, unrelated data such as health records or social activities will not be shared.

You must not put identifiable personal information into AI systems without authorisation and a proper legal basis to do so. This includes full names, addresses, email addresses, phone numbers. Any information inputted to a generative AI system may not remain private or secure.

**Special category data:** Do not input special category information without appropriate authority and legal basis. Special category data includes but is not limited to health, ethnicity, religion and safeguarding. These data categories require higher levels of care and security.

**Sensitive information risk:** Do not input trust sensitive internal documents such as strategic plans, private or commercially sensitive contracts into third-party AI tools unless

explicitly vetted and approved for that purpose. Staff must always recognise and safeguard sensitive data.

## ii. Lawful Basis for Processing

Prior to implementing and sharing data with any AI system, the trust will identify and document the legal basis for processing and sharing personal data.

Common legal bases under UK GDPR may include:

- Consent: If AI systems require the processing of sensitive personal data, explicit consent from the data subject (or their parent/carer) is often necessary;
- Public Task: Processing may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
- Legitimate Interest: When processing is necessary for the school's legitimate interests, but only if these interests are not overridden by the rights and freedoms of the data subject;
- A legal basis must be clearly communicated to data subjects in an understandable and accessible manner;

Copyright and intellectual property: take care not to infringe copyright or intellectual property (IP) conventions. This includes avoiding the use of IP, including that of learners, to train generative AI models without appropriate consent.

## iii. Data Subject Rights

The trust will continue to uphold data subject rights under UK GDPR in relation to the use and implementation of AI systems. Further information about your data subject rights can be found in the published 'My Rights – A guide for Data Subjects' available on the trust's UK GDPR webpage.

## iv. Data Privacy Impact Assessments (DPIA)

Before deploying any AI tool that uses personal data, the trust will conduct a DPIA to:

- Identify potential risks to data privacy and security.
- Analyse how these risks can be mitigated or eliminated.
- Document the assessment and share it with stakeholders as required.

The DPIA will be reviewed and updated regularly to ensure continued compliance, especially when the AI system undergoes significant changes.

Our external data protection officer will review the DPIA and advise accordingly.

Only AI systems which have been subject to this due diligence and have been approved are to be used on the trust and academy devices. Unapproved AI systems must not be used in any circumstance.

**Should you wish to implement an AI system, you need to notify the trust's GDPR lead who will undertake a check of the system and seek advice from the data protection officer as required.**

v. Data Security

OAK Trust is committed to protecting all personal data with robust security measures to prevent personal data from unauthorised access, breaches, or loss. These measures include encryption, secure network infrastructures, controlled access permissions, and regular security audits. These are all measures that will be assessed and implemented upon deploying any AI system.

In case of a data breach, the trust and schools will follow the 'Data Breach and Non-Compliance Procedure' as set out in Appendix 1 of the trust's Data Protection policy available on the trust's GDPR webpage.

**Principles for the use of AI**

It is important that the trust uses the following principles in guidance of using AI in educational settings. The trust reserves the right to update these in accordance with evolving technologies and updates within the sector, or government legislation.

Prioritise Human Judgement

AI should assist, not replace, human decision-making. Staff must ensure that final judgements, particularly those affecting individuals, are made by humans. This approach allows AI to compliment your professional judgement and expertise rather than replacing them. Be a ware of the risk of deskilling yourself by over-relying on AI which can lead to automation bias or automation-induced complacency. Generative AI tools cannot replace the judgement and deep subject knowledge of a human expert.

Fact-check and critically evaluate

Always fact-check and critically evaluate AI-generated content for accuracy, bias and discrimination before sharing or endorsing it, especially for external communication. AI content is not always accurate and appropriate and may contain inherent biases. Generative AI tools have limited regard for truth and can output biased or harmful information.

Appropriate use

OAK Trust recognises that with the introduction of AI there may be additional features for the auto generated content.

All stakeholders must ensure the following principles are adhered to when using AI to generate content which includes video, images or written content:

- Any AI tools must not be used to generate images or video material that are defamatory in nature; this includes content of a sexual nature, explicit format or pose any kind of risk to safeguarding.

- Users must not use the AI image or video tools to generate content of any individual without their written permission.
- Staff must ensure that OAK Safeguarding Policy is applied at all times as the underlying principles when using AI, or supporting students using AI in content creation.

AIT, as the Trust's IT support provider, will support monitoring of AI-enabled platforms and uphold technical safeguards.

Staff and students are permitted to use approved AI systems in accordance with the Acceptable Use Protocol (Appendix B and D) which have been shared and available on the Trust website and within the Online Safety Policy. Any new tools must be reviewed by AIT and the DPO before use.

Any AI misuse will be subject to existing disciplinary procedures.

#### Safeguarding (including Cybersecurity)

AI must be used in a way that upholds the safeguarding of children. Key principles:

- AI tools should not be used to make high-stakes decisions about pupils without human oversight
- AI-generated content must be carefully monitored to ensure appropriateness
- Cybersecurity measures must be in place to prevent AI-related threats, including phishing, bias exploitation and unauthorised data access
- AIT will conduct routine reviews of any AI tools used across the Trust to assess vulnerabilities or exploit risks
- Staff and pupils must receive guidance on recognising AI-generated misinformation and deep fakes

#### Educational Value:

- AI tools must serve an educational purpose and support teaching, learning, or administrative efficiency
- AI should complement but not replace pedagogical expertise
- AI should not replace personal feedback and relational teaching

AI tools must align with the school's curriculum, values, and accessibility needs; including SEND and EAL support where relevant

#### Examinations and Coursework

OAK Trust recognises that there may be times students or staff use AI to seek information to aid preparation of examination materials or graded content. OAK MAT uses AI detection software and work alongside examination boards to flag where this may have been used, and as such action will be taken where AI has been used in unlawful circumstances that breach examination regulations.

#### Transparency:

The use and purpose of AI must be transparent to staff, students, and parents. All stakeholders should be informed about the use of AI, what data it processes, and how outcomes are determined. This includes informing stakeholders of the data being processed, decisions made, and who oversees the AI tool.

The trust expects the following disclaimer to be used where AI has assisted you with a task:

*This task/communication has been supported by AI tools in line with the trust's Use of AI Policy. All content is subject to human oversight and professional judgement.*

### **Professional Responsibility and Accountability:**

The trust remains legally accountable for all decisions made or supported by AI systems. Staff must retain human oversight in all educational and safeguarding contexts.

#### Professional Judgement

AI tools should complement staff professional judgement and expertise; they must not replace them. Staff remain professionally responsible and accountable for the quality and content of any output generated by AI.

#### Avoid unauthorised software

Do not install or attempt to install unauthorised AI systems on a trust device or alter settings unless permission has been granted.

#### Ethical Considerations

- AI systems must be regularly audited to ensure they are free from bias and do not disproportionately affect any group of students or staff. Steps must be taken to correct any identified biases and AIT and the DPO will review audit findings to assess technical accuracy, bias, and accessibility
- AI should not discriminate against individuals based on characteristics such as age, race, gender, or socioeconomic status.
- AI must support diverse learning needs, ensuring accessibility for SEND pupils.
- The use of AI should prioritise the well-being and safety of students and staff.
- AI tools must not create undue stress or pressure on students, and safeguarding concerns must be a priority.
- When AI is used in a way that directly impacts students or staff, informed consent should be obtained where required by law.

#### Implementation and Training

- All staff involved in the use of AI technologies must receive training on ethical AI use, data protection, cybersecurity and the potential impacts of AI on education. Annual AI and data protection training will be delivered by the DPO and AIT in partnership.
- All staff are aware of their filtering and monitoring requirements and will uphold high vigilance on the use of AI. Staff will be trained on how to recognise AI-generated misinformation and ethical concerns. Any inappropriate use or discrepancies in the AI generated content will be reported and rectified.

- The implementation and impact of AI tools will be regularly reviewed to ensure they align with educational goals and ethical standards. Adjustments will be made based on new developments and feedback from stakeholders.
- There must be clear guidelines on acceptable AI use in lesson planning, assessment, and communication.
- Training will be reviewed annually to remain current with AI developments.

### **Third-Party Providers**

Before engaging with third-party AI providers, due diligence will be performed to ensure their compliance with UK GDPR and ethical guidelines. Contracts must outline data protection responsibilities.

Any third-party service processing personal data must have a clear data processing agreement (DPA) in place, specifying their role and the data protection measures in place.

AIT will support due diligence reviews and risk assessments for any third-party AI tool used by the school to ensure the compliance of the software, UK GDPR and address stakeholders privacy concerns.

### **Reporting concerns**

#### **Report incidents immediately**

You must report or communicate any suspected misuse or concerns to the appropriate individual within the school immediately. This will be your school's GDPR lead, details of whom can be found on the school's GDPR page on the website or within the Data Protection Policy. This includes incidents involving AI misuse, data breaches, or inappropriate outputs generated by AI. Instant reporting helps mitigate risks and facilitates a prompt response.

If you are unsure about the appropriate use of an AI tool, particularly regarding data privacy, compliance, or potential risks, seek advice from the designated GDPR lead who will liaise with the trust's Data Protection Officer (DPO) accordingly.

### **Review and Compliance**

This policy will be reviewed annually or as often as needed in response to statutory or significant technological changes or a newly identified risk to ensure it remains compliant with legal requirements and reflects best practices in AI use in education.

By following this policy, we can collectively ensure that AI is used safely, ethically, and effectively to enhance learning and administrative processes in our trust.

## **Appendix A: AI in a School Context**

### **AI isn't new**

Artificial intelligence (AI) is the use of computer systems to solve problems and make decisions. It's already a part of everyday life – you've probably already come across it in the form of personalised suggestions on social media, shopping sites or route-planning apps. However, the technology is developing rapidly and throwing up many new challenges for schools.

### **What is AI in a school context?**

AI tools can help teachers by:

- Creating differentiated lesson plans and resources for subjects like English and Maths.
- Generating classroom management strategies.
- Assisting with report writing, including end-of-term summaries.
- Providing ideas for classroom activities and learning interventions.

While these tools can reduce administrative burden, they must be used carefully to protect sensitive information about pupils and staff.

### **What's generative AI?**

Generative AI takes a written prompt and runs it through an algorithm to generate new, 'natural'-seeming content. Tools include:

- Chatbots such as ChatGPT, Google Gemini and GrammarlyGO, which generate text
- Text-to-image programs like DALL-E and Midjourney, which create images (some programs can make AI-generated animations and near-photorealistic videos, too)

### **We will review our policies**

Homework policy: the DfE has suggested we consider how we'll approach homework and whether we need to revise our homework policy, to take into account pupils' access to generative AI tools – see its [policy paper on generative artificial intelligence in education](#)  
Exams/assessment/coursework/plagiarism policy: the [Joint Council for Qualifications](#) classifies AI misuse – where a pupil submits AI-written work as their own – as malpractice. We'll update our definitions of plagiarism to make this clear.

### **Explain our rules on AI use to pupils:**

- Make sure pupils know that using AI without crediting it is not allowed in exams, coursework or any work that's internally assessed to count towards a qualification. Remind pupils of this when they have exams and coursework coming up.
- Have an open dialogue with pupils about how and when AI tools can be used to support learning, and when they shouldn't be used.
- Where possible, support pupils to find age-suitable tools and resources and use them appropriately, without relying on them too much.

For example:

- use a PSHE or computing lesson to teach pupils how and when to use an appropriate tool
- Discuss the issue if a pupil brings it up in class or submits AI-generated work

## **Safeguarding**

Teachers must ensure that AI use aligns with the following principles:

1. **Protecting Pupil Identity**
  - Do not input full names, personal information, or identifiable details about pupils into AI systems.
  - Use anonymised data (e.g., "Pupil A") when necessary.
2. **Appropriateness of AI-Generated Content**
  - Ensure that all AI-generated content is age-appropriate and free from bias.
  - Never use AI to handle behaviour management records or safeguarding disclosures.
3. **Monitoring and Approval**
  - Only use AI tools approved by the school and trust. If unsure, consult the IT lead or safeguarding officer.

Our school/trust may also be targeted by fraudulent emails, such as 'phishing' attacks, which are often AI-generated and very convincing. Look out for the following signs:

- Email addresses that don't match the contact details you have on file
- Poor spelling and grammar, including American spellings, or an overly formal tone
- Messages demanding urgent, time-sensitive action
- Suspicious links, e.g., containing strings of numbers
- Generic introductions (e.g., Dear Sir or Madam)

Report any suspicious emails to our MSP (AIT) or to your GDPR lead.

### **Never enter sensitive information into an AI tool**

Continue to follow our data protection principles and rules, and be aware that any text entered into an AI tool is potentially being made public. If you're using AI for any reason, don't enter any personal or sensitive data.

What Teachers Can Do:

- Use AI to create generic lesson plans and resources for classroom use.
- Generate differentiated learning tasks (e.g., writing prompts for Years 3–6).
- Ask for ideas on classroom management and teaching strategies.
- Summarise anonymised assessment data for internal analysis.

What Teachers Cannot Do:

- Input personal or sensitive information about pupils or staff (e.g., names, addresses, medical information).
- Use AI to handle safeguarding reports or behaviour incident logs.
- Share any confidential or safeguarding-related information with AI tools.

- Store AI-generated documents on non-approved devices or platforms.

### **AI could save you time but it's not always reliable**

AI tools are only as accurate as the information they're trained on. They may generate responses that are incorrect, biased, or inappropriate.

Many tools are based on a defined set of information, so won't be able to accurately give you answers about anything that has changed after data was inputted – e.g. new statutory policy requirements or current events.

Therefore, it's important to check all AI-generated results carefully.

You can use AI tools as a starting point, but you should always check and adapt the results so they are:

- Taking the best interests of staff, pupils and the school/Trust into account
- In line with our school/trust policies, procedures and guidelines

Ofsted will judge our school's/schools' use of AI (if we choose to use it). Ofsted expects us to:

- Make sure our AI solutions are safe and secure, and protecting users' data
- Be transparent about the school's/schools' use of AI and make sure we understand the suggestions it makes
- Use AI only when it's ethically appropriate to do so
- Closely monitor the AI we use for bias
- Identify and correct any bias or problems, where appropriate
- Give staff clear roles in monitoring, evaluating, maintaining and using AI tools
- Make sure that staff are empowered to correct and overrule suggestions made by AI
- Respond appropriately to any concerns, or complaints about errors made by AI

## Checklist for Staff

### **Before Using AI:**

- Have I removed all personal and identifiable information from the data I'm inputting?
- Has AIT or the DPO approved this tool for classroom or admin use
- Does this task align with OAK Trust's safeguarding and GDPR policies?

### **While Using AI:**

- Am I ensuring that AI-generated content is age-appropriate and unbiased?
- Am I avoiding sensitive or safeguarding-related information?

### **After Using AI:**

- Have I securely stored AI-generated content?
- Have I reviewed the content for accuracy and appropriateness before sharing?
- Have I reported any concerns to the safeguarding or data protection team?

### **Consequences of Misuse**

Misusing AI tools could lead to:

- **Data breaches** resulting in GDPR violations and potential fines.
- **Safeguarding risks**, compromising pupil safety and trust.
- **Damage to professional reputation** and loss of community trust.

### **Conclusion**

AI can be a valuable tool for staff when used responsibly. By following safeguarding principles, trust policies, and GDPR guidelines, teachers can ensure they are using AI safely and effectively while protecting both pupils and themselves.

**If in doubt, consult the school's safeguarding lead or Data Protection Officer (DPO) for further advice.**

## **Appendix B: Staff Acceptable Use for AI**

### Staff - acceptable use for Artificial Intelligence (AI)

OAK MAT recognises staff may choose to use approved AI systems to support their day-to-day working. However, the use of AI brings an array of risks and whilst the Trust has put measures in place to mitigate these, you also have a responsibility to use the systems appropriately.

To support your use of AI systems, you must adopt and abide by the following procedures. Failure to do so could breach UK GDPR and data protection obligations and breach your employment contract.

The Trust will ensure you are provided with necessary training to understand and safely use AI.

It is your responsibility to read and comply with the following protocol when using our approved AI system.

#### **You *must not*:**

- use AI as a reliable and single source of information.
- input identifiable personal information including that which falls within the remit of special category without the appropriate consent
  - (personal information includes full names, address, email address or phone number)
  - (*special category information includes health, ethnicity, religion*)
- engage in activity which may compromise the security or safeguarding of the school or Trust community.

#### **You *must*:**

- be transparent about AI-generated content.
- report or communicate any concerns to the appropriate individual within the school or Trust.
- be aware of student engagement and uses of AI.

#### **You *can*:**

- use a pseudonym to ensure any personal inputted is not identifiable.

## **Appendix C: Guidance for Trust leaders, Headteachers and SLT**

It is important that as a trust/school you define and become familiar with any AI systems that are to be adopted in your education setting. It is essential that a variety of systems are carefully considered before implementing them and training your staff and students.

### **Evidence and planning:**

- **Identify the purpose of using AI** – how will this benefit the trust/school, what other solutions have been considered and why is AI the best option.
- **Explore the variety of AI tools** – find the best tool which will benefit your trust/school the most. Test it out with a small number of staff who have an interest in or knowledge of AI.
- **Data Privacy Impact Assessments (DPIA)** – for any AI system you must consider and undertake a DPIA where necessary before implementing the system.
- **Carry out a risk assessment** – this may form part of your DPIA - identify the risks and what safeguards should be put in place to mitigate them.
- **Plan the staff training which will be needed** – how much AI awareness is there across your trust/school workforce? What is the best way to roll the training out?
- **Policies and protocols** – implement our template protocol and privacy notice to ensure compliance with your obligations under the Data (Use and Access) Act 2025, UK GDPR and Data Protection Act 2018.
- **How will pupils/students be briefed on using AI** – plan an effective communication system for the safe use of AI with your pupils/students. For example: is this through an assembly or tutor time or within an IT lesson? Best to be creative to engage interest! Whilst you won't get 100% engagement it is important that you can evidence that they have been informed.
- **Transparency - how will parents/carers be notified of the AI use** – a simple newsletter...or via your general school comms, a dedicated area during parents evening?  
What needs to be considered when exploring potential systems...
- **precautionary measures which will be needed to protect individuals from harmful content.**

- **data privacy - how will you continue to protect individual's data and uphold data subjects' rights.**

*Any data inputted to the system may be included within its training dataset. You will need to emphasise the importance that no personal information is inputted into AI systems.*

- **consider all your stakeholders.**

*Individuals will have varying knowledge of AI, therefore, you must consider the most appropriate way to approach communication with staff, pupils/students and parents/carers to minimise complaints or concerns.*

- **review your current policies and procedures, does the AI system comply with them?**

*You should consider how accessible and inclusive the tool is and whether it will comply with your security and data privacy policies. Understanding the benefit the system will have across teaching and learning should be weighed up against the risks.*

## **Appendix D: Student Acceptable Use for AI**

### Student – acceptable use of Artificial Intelligence (AI)

OAK MAT recognises students may choose to use approved AI systems to support their learning. However, the use of AI brings an array of risks and whilst the Trust have put measures in place to mitigate these, your child also has a responsibility to use the systems appropriately.

To support your child's use of AI systems on school devices, they must adopt and abide by the following procedures.

Failure to do so could lead to an appropriate disciplinary measure.

The Trust will ensure that you and your child is provided with necessary knowledge to understand and safely use AI.

It is your child's responsibility to read and comply with the following protocol when using our approved AI system.

#### **You *must not*:**

- use AI as a reliable and single source of information.
- input identifiable information of others.  
*(such as names, phone number, social media '@')*
- submit a generated essay or homework submission entirely completed by AI ([see ref page below: Using AI](#)).

#### **You *must*:**

- be transparent about AI-generated content.
- report or communicate any concerning content to a staff member.

#### **You *can* use AI to:**

- summarise the content from an extract of wording.
- get inspiration on how to present a piece of work.
- begin researching a specific topic
- proofread your work before submitting to the teacher.

EXAMPLE	COMMENTS
<b>Posing a dissertation question to an AI and then passing this off as your own work</b>	This is plagiarism and is unacceptable.
<b>Posing an article question to an AI and making edits before submitting this to your teacher</b>	This is still plagiarism. The majority of the hard thinking has been done by the AI so even if the product here is better than what you could have produced yourself, you are not gaining any information on being able to improve your skills and work in the future.
<b>Providing the AI with some bullet points to include and asking it to create a document</b>	Given the purpose of any assignment at school is to assess your ability to include relevant information and construct a reasonable argument, outsourcing the hard thinking on the drafting of the argument would not be an appropriate use of AI.  In this case, you are better off submitting your bullet points to your teacher and seeking advice on structuring your document.
<b>Ask AI to provide statistics or evidence to back up your arguments</b>	This is acceptable but you must use caution. AI can generate incorrect, random, or unrelated responses.
<b>Asking AI to critique your draft work and give feedback, then rewrite your project based on the feedback</b>	This would be a good way to use AI but should be used with caution.  It is important you put sufficient effort into the first draft - it should be something you would be happy to hand in to your teacher. AI may not always use the same criteria as your teachers to check your work.
<b>Use AI to generate practice questions</b>	This is a good way to use AI but could provide you with irrelevant or unconnected questions. You would need to be confident that the AI was asking questions on important information and that it hadn't made any factual errors. The time spent going back and forth with the AI and checking the questions might be better off spent elsewhere.
<b>Asking AI to produce a summary of longer texts</b>	This is a helpful way to undertake initial research to find out whether the longer texts are appropriate. However, it is then important you go back to the relevant documents to read in depth as the summary may have missed some of the key points within an argument.
<b>Asking AI to explain a concept you are finding tricky</b>	This would be a good way to interrogate your own understanding of a topic as you can have a conversation with the AI and ask it to elaborate or re-explain using different examples.  However, it must be used with caution and you must always check your final understanding against other sources of information such as your teacher.
<b>Using AI as a dictation tool</b>	This would be a really good way to use AI as speaking is usually quicker than typing. You could explain a concept to the AI and get it to produce a verbal transcript or a summary. If you don't understand the summary it produces, you probably don't have as good a grasp of the concept as you think.
<b>Use AI as a way of generating multiple different ideas</b>	This would be a good way to use AI as it may come up with ideas that you wouldn't have thought of yourself. The important thing is that you then use your own knowledge and understanding, or other sources of information, to evaluate the different ideas.
<b>Ask AI to provide some suggestions for further reading around a topic</b>	This would be a good use of AI, particularly if you give it some detailed prompts.
<b>Talking to an AI in a foreign language for extra practice</b>	This would be a great way to use AI though bear in mind that some of the information it includes in its conversations may not be factually correct

