

Artificial Intelligence (AI) Policy

Policy Code:	ICT5
Policy Start Date:	April 2026
Policy Review Date:	March 2027

Please read this policy in conjunction with the policies listed below:

- HR5 Acceptable Use Policy
- HR6 Data Protection Policy
- HR6A Data Breach Policy
- HR12 Staff Disciplinary Policy
- HR29 Staff Code of Conduct
- HR33 Records Management Policy
- ICT2 Online Safety (Staff) Policy
- ICT3 Online Safety (Pupils) Policy
- SW4 Student Behaviour and Discipline
- TL4 Learner Malpractice Policy

1 Policy Statement

- 1.1 The policy outlines the Trust's approach to the use of Artificial Intelligence (AI), particularly, generative AI.
- 1.2 References to the Trust or Academy within this policy specifically include all primary, secondary and special academies within the Trust, as well as the Early Years setting at the Priory Witham Academy, Priory Apprenticeships and Lincolnshire ITT.
- 1.3 This policy does not form part of any member of staff's contract of employment and it may be amended at any time.
- 1.4 This policy applies to the use and configuration of all AI systems that have either been provided by the Trust as part of general IT tools available to staff, e.g., Microsoft Copilot, procured by the Trust for a specific use or approved by the Trust for staff to use.

2 Roles, Responsibilities and Implementation

- 2.1 The Education & Standards Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Education Team.
- 2.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success.

3 Aims

- 3.1 To ensure that the use of AI is organised and controlled in a manner which will be beneficial to the safety of all individuals.
- 3.2 To ensure that users are aware of the controls and methods in place to manage the use of AI.
- 3.3 To ensure that, where AI systems are used, they enhance learning.
- 3.4 To use AI to support staff to manage their workload more efficiently and effectively.
- 3.5 To help prepare pupils and learners for a future in which AI technology will be an integral part.

3.6 Ensure value for money in the Trust's services by maximising efficient processes using available technology.

4 Guiding Principles

4.1 The Trust's approach to AI, and this policy, have been informed by the following overarching guiding principles:

- **inclusion and wellbeing** - AI technologies contribute to the Trust's inclusive educational culture and contribute to the wellbeing of all pupils and staff;
- **sustainability** - the Trust uses AI technologies in ways that contribute to environmental sustainability, where possible;
- **rights and privacy** - the Trust respects individuals' privacy, ensuring that AI systems adhere to data protection laws and ethical standards;
- **fairness** - AI solutions are free from bias and promote equity among all those who are subject to AI processing and protect the intellectual property of individuals;
- **transparency and explainability** - the Trust maintains openness about the use and capabilities of AI systems within the settings, making information accessible to all stakeholders;
- **security and safety** - AI systems are secure and function reliably;
- **accountability and governance** - any users are held accountable for the ethical deployment and management of AI systems within their settings; and
- **support for pupils and staff** - AI technologies are used primarily to enhance pupil learning and secondly to support the professional learning of staff.

5 Examples of how AI systems might be used

5.1 Examples of teaching tasks:

- lesson planning;
- marking;
- adapting materials and plans to ensure they are accessible for all learners;
- timetabling; and/or
- attainment tracking.

5.2 Examples of business tasks:

- call transcription;
- summarisation of large or specialist documents;
- translation;



- drafting of communication materials;
- content creation; and/or
- reviewing materials for accessibility.

5.3 Examples of pupil tasks:

- source information about a topic;
- create revision notes;
- summarisation of large documents; and/or
- ask questions about a topic they are working on.

6 Prohibited uses of AI

6.1 The Trust does not permit any individual to use AI for the following uses:

- AI systems designed to deceive, coerce or influence human behaviour in harmful ways;
- AI systems that prey on an individual’s vulnerabilities, such as age, disability or socio-economic status;
- AI which utilises emotion recognition within the workplace or educational settings;
- AI systems that use AI for ‘social scoring’ where scores are assigned to individuals based on their behaviour, affecting access to services, employment or other opportunities; and/or
- biometric categorisation based on sensitive biometric attributes such as race.

6.2 Individuals who use AI for the uses outlined in 6.1 may be subject to disciplinary action, in line with HR12 Staff Disciplinary Policy or SW4 Student Behaviour and Discipline (as appropriate).

7 Responsibilities with regards to the use of AI systems within the Trust

Trust’s Central Team	<ul style="list-style-type: none">• To provide users with an approved AI system as part of the general IT tools available and to ensure an appropriate Data Protection Impact Assessment (DPIA) is in place for any Trust-wide approved AI system.• Review and approve requests from staff within Central Services to start using new AI systems.• Review and approve any requests from academies where an AI system they wish
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	<p>to use is blocked by the Trust’s filtering system.</p> <ul style="list-style-type: none"> • To ensure an appropriate AI risk assessment is in place. • To provide appropriate training to ensure all staff are proficient in using AI systems. • The Trust’s Data Protection Officer (DPO) will review any requests made by settings to share personal data with AI systems, and keep a record if any are approved for data sharing.
<p>Academy Headteacher (or nominated Deputy) and Data Protection Lead (where appropriate)</p>	<ul style="list-style-type: none"> • To maintain a list of all AI systems used by staff in the setting, along with a record of any department/curriculum area which uses AI systems with pupils as part of the curriculum. • Along with the academy’s Senior Leadership Team, to review and approve any requests from staff within the setting to start using new AI systems. • In the event that staff wish to use an AI system which is blocked by the Trust’s filtering system, then the Headteacher or SLT should refer this to the Trust’s Central Team for review. • Ensure that content produced by AI systems used in the academy are subject to the same assurance processes in line with the Trust’s approach to curriculum, teaching and assessment. • To empower staff to correct and overrule AI suggestions where necessary. • To ensure that personal data is not shared with AI systems unless a DPIA and Data Share request has been completed by the academy and approved by the Trust’s DPO. • To ensure that staff understand their responsibilities with regards to intellectual property.
<p>Teaching Staff</p>	<ul style="list-style-type: none"> • To use AI systems to enhance the learning experience and optimise pupil progress. • To model safe and responsible practice of AI systems to pupils.



	<ul style="list-style-type: none"> • To collaborate with colleagues, integrating AI appropriately into the curriculum where possible. • To remain compliant with the Trust’s Data Protection processes. • To be aware of intellectual property implications and seek advice if needed.
Support Staff	<ul style="list-style-type: none"> • To use AI systems to streamline processes and allow greater time to focus on pupil support. • To remain compliant with the Trust’s Data Protection processes. • To be aware of intellectual property implications and seek advice if needed.
Pupils/Learners	<ul style="list-style-type: none"> • To use AI systems responsibly, respecting the privacy and rights of others; • To use AI systems to enhance learning and explore new ways to engage with educational content, but not to plagiarise or produce work which is not their own. • To be mindful of their online behaviour and the impact of AI on their digital footprint.
Parents/Carers	<ul style="list-style-type: none"> • Parents are asked to stay informed about the AI systems being used by their child(ren) and to understand both the educational benefits and the potential risks. • To provide guidance to their child(ren) on the responsible use of AI, advocating for the protection of their child(ren)’s personal information. • To work collaboratively with the academy to support their child(ren)’s learning and ensure the ethical use of AI.

8 Ethical considerations

8.1 When considering the use of AI, particularly generative AI, users should be mindful of the following considerations:

- bias – data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socio-economic background;

- accuracy – information may be inaccurate when generated so any content should be fact-checked. Systems may provide highly plausible and coherent results but may still contain errors;
- human oversight – users should be aware that generative AI lacks flexibility, human understanding and compassion and some level of human intervention is still required;
- currency – some AI models only collate data prior to a certain date, so content generated may not reflect the most recent information;
- environmental issues – use of AI requires energy to run. Therefore, it should only be used when relevant, appropriate and proportionate, where it is the most suitable and sustainable option; and
- reputational – we have a duty to ensure that we maintain our relationships with our stakeholders by ensuring they are not harmed by our use of AI.

9 Data Protection

- 9.1 Personal data must be protected in accordance with data protection legislation. It is recommended that personal data is not used in generative AI systems and not without specific approval.
- 9.2 If it is necessary for personal data to be used in AI system, then the member of staff must seek agreement from the Trust's Data Protection Officer (DPO). This process will involve ensuring that data subjects are aware that their personal data is being processed using AI systems and may, if necessary, rely upon data subjects providing consent for their data to be used in this way. A DPIA and Data Share request should be submitted to the Trust's DPO in support of any request to use a new AI system.
- 9.3 Under no circumstances are staff permitted to share personal data with AI systems without approval from the Trust's DPO. Staff should be mindful of data protection laws if they are permitting pupils to use AI systems as part of their curriculum, and must ensure that pupils understand the implications of sharing personal data with AI systems and that they must not share personal data unless given clear permission to do so by a member of staff and never share any personal data with an AI system other than their own.

10 Intellectual Property

- 10.1 Materials protected by copyright can only be used to train AI if there is permission from the copyright holder, or a statutory exception applies.
- 10.2 In line with DfE guidance, materials created by pupils and teachers may well be copyright material, assuming the statutory standard for what comprises copyright material is satisfied. This standard is generally considered to be low and does not factor in the quality of the work produced.



10.3 Copyright law is distinct from data protection law, so any consents or data processing agreements for personal data are separate from issues of compliance with copyright law.

10.4 Examples of what may be deemed original creative work include:

- essays, homework or any other materials written or drawn by a pupil (it is unlikely that multiple-choice questions responses will constitute copyright work);
- lesson plans created by a teacher; and/or
- prompts entered into generative AI systems.

10.5 Staff must not allow or cause pupils' original work to be used to train generative AI models unless they have permission, or an exception to copyright applies.

10.6 Permission would need to be from the:

- pupil, as the copyright owner; or
- pupil's parent or legal guardian, if the copyright owner is unable to consent because of being a minor.

10.7 Users should also be aware of the risk of secondary infringement. This could happen if AI products are trained on unlicensed material and outputs and then used in educational settings or published more widely, for example, on our website.

10.8 Examples of this may include:

- publishing a policy that has been created by an AI system that used input taken from another school or college's policy without that setting's permission; and/or
- using an image on a website that has been created by an AI system using input taken from the copyright holder without their permission.

11 Process for using a new AI system/functionality

11.1 If staff wish to use a new AI system (new to the academy), either to support their work or to use with pupils, they must first request permission from the Academy Headteacher.

11.2 Any request submitted to the Academy Headteacher should include:

- the name of the AI system;

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- the reason for using it (why it is necessary);
 - if alternatives currently used by the Trust have been considered, why they are not appropriate;
 - any potential limitations and/or concerns;
 - if personal data might be shared with the AI system (and if yes, then what);
 - whether or not the AI system uses content shared with it to train the model; and
 - how will the content produced be quality assured?

The member of staff may be required to provide further information, as requested.

- 11.3 The Academy Headteacher, and the Senior Leadership Team (SLT) will review the request, seeking advice from the Trust's Central Team if required.
- 11.4 If applicable, the IT process for approving new software must be followed by the academy (this includes web-based software).
- 11.5 If it is approved by SLT, then this will be recorded and shared with the member of staff, along with any information the member of staff needs to be aware of.
- 11.6 If the member of staff has identified that they wish to share personal data with the AI system, then the Academy Headteacher will pass the request to the Trust's Data Protection Officer for review. This request should include completed DPIA and Data Share request forms.
- 11.7 In the event that the AI system requested by the member of staff is blocked by the Trust's filtering system, the Academy Headteacher will pass the request to the Trust's Central Team to review.
- 11.8 If the Trust's Central Team deem that the AI system can be permitted to be used, this will be recorded with the Trust's IT Team to show the rationale for removing the block put in place by the Trust's filtering system.
- 11.9 The Trust's Central Team will have access to the records of AI systems used by each academy, and shall maintain a central record of all AI systems where data sharing has been approved.

12 Use of AI in the classroom with pupils

- 12.1 Staff should be aware that most AI systems have age restrictions, and will not be suitable to use with children in primary academies, or even children in Key Stage 3 within secondary academies. Whilst the age restriction varies between systems, many require users to be at least 13 years old.

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- 12.2 Some curriculum areas, for example, IT and Computing, contain requirements to use AI systems with children and young people as part of the curriculum. Where this is the case, staff must ensure they adhere to curriculum guidance and ensure that pupils are supported through structured teaching that role models good practice.
- 12.3 Staff must only use AI systems with pupils if it has been agreed by the Academy Headteacher (and the Senior Leadership Team).
- 12.4 In the event that staff are going to use AI systems with pupils, they must ensure that pupils understand the following:
- the data protection implications that can arise from using AI systems, and that personal data must not be shared with AI systems without permission from the Trust's Data Protection Officer;
 - the need to be compliant with copyright law and the importance of preserving intellectual property;
 - that misuse of AI systems may lead to disciplinary action being taken, in line with SW4 Student Behaviour & Discipline Policy.
- 12.5 Staff must never set pupils an independent learning task that requires them to use AI systems. The only exception to this is where it is required by a subject's curriculum, and staff should ensure that the necessary modelling and support has been in place prior to the task being set, and they work with parents/carers to ensure they can support their child with any learning of this type.

13 Policy Change

- 13.1 This policy may only be amended or withdrawn by the Priory Federation of Academies Trust.



The Priory Federation of Academies Trust

Artificial Intelligence (AI) Policy

This Policy has been approved by the Education & Standards Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.