

Trust AI Policy

Trust Policy & Procedures

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<i>Trust Policies</i>	Child Protection and Safeguarding Policy Statement Data Protection Policy Staff Code of Conduct
<i>School Policies</i>	ICT Acceptable Use Policy
<i>External</i>	Data Protection Act 2018 (DPA) The UK General Data Protection Regulation (UK GDPR) DfE (2025) 'Keeping children safe in education 2025' DfE (2023) 'Generative artificial intelligence in education' DfE (2023) 'Meeting digital and technology standards in schools and colleges'

Document Control

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Please note this list may be updated by the responsible officer when change arises in the organisation, without the need for committee meeting review/approval.

1 Introduction

The Board of Trustees of Learning Partners Academy Trust (“the trust”) recognises the significant potential of artificial intelligence (AI) to enhance both classroom and non-classroom based activities and processes within schools. The trust is also aware of the risks associated with AI, including data protection, breaches, safeguarding and child protection, copyright infringements and ethical issues.

The primary aim of this policy is to ensure that all staff, pupils and visitors in our schools use AI technologies in a safe, ethical and responsible manner.

This document:

- Defines the approach to the use of Artificial Intelligence (AI) across the trust;
- Defines the roles and responsibilities of all individuals within the trust with respect to AI;
- Outlines the further work that schools are expected to take in respect of managing their approach to using AI;

This AI Policy is the lead document for AI within the trust and applies to all staff, governors and visitors and applies to all schools within Learning Partners Academy Trust (the “trust”).

For the purposes of this policy, the following definitions of AI apply:

- AI – The theory and development of computer systems able to perform tasks normally requiring human intelligence, e.g. visual perception, speech recognition, decision-making
- Generative AI – A category of AI algorithms that generate new digital content, such as text, images, videos or other data based on the data they have been trained on.

This Policy and any School Policy will follow the 5 regulatory principles set out in the AI regulation white paper

- Safety, secureness and robustness
- Appropriate transparency and explainability
- Fairness
- Accountability and governance
- Contestability and redress

2 Legislation

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Data Protection Act 2018 (DPA)
- The UK General Data Protection Regulation (UK GDPR)
- DfE (2025) ‘Keeping children safe in education 2025’
- DfE (2023) ‘Generative artificial intelligence in education’
- DfE (2023) ‘Meeting digital and technology standards in schools and colleges’

3 Roles and Responsibilities

3.1 Board of Trustees

They shall ensure that:

- Sufficient resources and strategic direction are allocated by it and its academies to ensure, as far as is reasonably practicable a safe, ethical and responsible learning environment is maintained when using AI.
- Appropriate monitoring procedures are in place to ensure compliance with this policy and to identify incidents and issues as they arise.

3.2 Chief Executive Officer (CEO)

The CEO has overall responsibility for the safe, moral and ethical use of AI throughout the trust and for ensuring that the objectives of this Policy Statement are implemented.

3.3 Local Governing Bodies (LGBs)

The Local Governing Body will:

- Take overall responsibility for monitoring their own school's AI policy and holding the Headteacher to account for its implementation in line with the trust's AI Policy; and
- Ensure that guidelines are adhered to protect data when using generative AI tools.

3.4 Headteachers

Headteachers will:

- Ensure the policies and procedures adopted by the trust are fully implemented and followed by all staff;
- Establish and implement an AI Policy for the school in collaboration with AI Leads (if applicable in school);
- May appoint an AI Lead or equivalent role to support local implementation of the trust and school AI policy within their school;
- Ensure that requirements relating to AI in the current JCQ regulations are included in the school's AI Policy;
- Liaise with the Central Trust Team and data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation;
- Liaise with the Designated Safeguarding Lead (DSL) to ensure that the use of AI is in accordance with the current *Keeping Children Safe in Education* document as well as the trust and the school's child protection and safeguarding policies;
- Review and update the school's AI policy annually;
- Ensure staff are provided with the appropriate training and information to use AI safely, ethically and responsibly.
- Ensure pupils are taught about the safe, ethical and responsible use of AI; and
- Identify approved AI tools for use by staff, pupils and visitors.
- Impact on SEND/ensuring equity in access/engagement

3.5 Staff

All Staff will:

- Use only approved AI tools as outlined in the school's AI Policy;
- Adhere to the school's ICT Acceptable Use Agreement and other relevant policies;

- Seek advice from the DPO/DSL and/or AI Lead;
- Report safeguarding concerns to the DSL in line with your school's child protection and safeguarding policy;

3.6 Pupils

All pupils will:

- Adhere to the School's ICT Acceptable Use Policy and other relevant policies;
- Follow rules and procedures set by staff; and
- Seek help from relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools.

4 Data Protection and Security

4.1 AI tools

This Policy does not provide a list of approved AI tools since these are changing on a daily basis and given age restrictions of various tools, these will vary by school based on the phase of pupils.

Microsoft's AI tool Copilot is however the only AI tool that the trust has a data sharing agreement with (through Office365). Therefore, no personally identifiable information for staff or pupils should be uploaded into any other AI tools.

Any personal data shared will be in line with the school/trust's ICT Acceptable Use Policy, Data Protection and Child Protection and Safeguarding Policy as well as the requirements laid out by the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Other AI tools that are approved by individual schools will be listed in the school's AI Policy.

Schools using AI tools for teaching purposes will ensure adherence to the age restrictions in each tool's terms of service.

Before procuring or deploying any new AI software, schools are required to consult with the Learning Partners Network Team and Deputy Data Protection Officer. A Data Protection Impact Assessment (DPIA) will need to be completed before any new AI system, software, or functionality is introduced where there is likely to be a high risk to the rights and freedoms of pupils, staff, or other individuals.

5 Acceptable Use for Staff

The trust encourages the use of AI tools to reduce workload, inspire creativity, and support administrative efficiency. However, the use of AI is subject to the professional judgement of staff.

Staff remain the primary authors and owners of all work produced and AI tools will be used as a resource and not a decision maker or author.

Generative AI is prone to "hallucinations" (plausible-sounding but incorrect facts), particularly regarding citations, historical dates, and scientific data and staff must review all AI-generated content for factual accuracy.

When using AI content in teaching, AI content must be adapted to fit the specific context of the school, the curriculum, and the needs of the pupils.

Staff are responsible for ensuring that any AI-generated teaching resources are inclusive and free from gender, racial, or cultural bias before presenting them to pupils.

A suggested set of points to include in the school's ICT Acceptable Use Policy has been included in Appendix 1 of this Policy.

Any misuse of AI by staff would be dealt with under the Trust Staff Code of Conduct.

5.1 Prohibited Uses

To ensure the integrity of the trust and the safety of our community, the following are strictly prohibited:

- **Processing Personal Data:** Entering names, photos, SEN status, home addresses, or medical details of pupils or staff into public/open AI models (e.g. standard ChatGPT, Claude, Gemini).
- **Safeguarding Reporting:** AI must never be used to draft safeguarding logs (e.g. CPOMS) or make decisions regarding child protection thresholds.
- **Generating Harmful Content:** Creating images or text using School/trust equipment or devices that violate the trust's Staff Code of Conduct.
- **Formal Communications:** AI must not be used to write formal communications involving legal, disciplinary, or complaints-related matters.

6 Acceptable Use for Pupils

The trust supports the responsible, moral, ethical and safe use of AI by pupils. The level and type of use by pupils must be appropriate to the phase/key stage of pupils which will be outlined in each school's AI policy.

The Trust is committed to upholding the highest standards of academic integrity and ensuring that all pupils engage meaningfully in their learning. The use of AI tools must support, not replace, the development of essential knowledge and skills. Pupils are therefore prohibited from using AI technologies to bypass the learning process, complete assignments dishonestly, or misrepresent AI-generated work as their own. Any misuse of AI in a way that compromises academic integrity will be treated as a breach of the School's Behaviour Policy.

7 Monitoring

This policy will be reviewed on an annual basis at the trust Education Committee.

Appendix 1 - AI Acceptable Use Suggested Wording

Suggested wording for an AI section of a school's ICT Acceptable Use Policy.

AI Acceptable Use

- Staff may only use Microsoft Copilot or other trust-approved AI tools when processing personally identifiable information relating to staff or pupils. No personal data should be uploaded to any non-approved AI tools.
- Staff are encouraged to use AI tools to support teaching and administrative activities, including generating ideas, lesson planning, simplifying or rewriting text, creating quizzes or model answers, drafting documents, summarising long texts, coding programming and assistance with workflow automation to improve workflow efficiency.
- All AI-generated content must be reviewed by staff for factual accuracy, appropriateness, and suitability before use.
- Staff must not use AI to impersonate staff voices or generate automated responses to parents.
- Staff must not use AI to write formal communications involving legal, disciplinary, or complaints-related matters unless approved by senior leadership.
- Staff must not issue unedited, "copy-and-paste" AI-generated material.
- Staff must not store outputs generated by AI on non-trust/school devices or systems.
- Staff are responsible for ensuring AI-generated materials respect copyright and licensing laws.
- Staff must not upload copyrighted materials (e.g., exam papers, textbooks) into any AI tool unless legally permitted.
- AI may assist with preparing risk assessments, but outputs must be treated as a starting point and adapted to reflect the specific needs of the school. Final versions must be reviewed by a qualified or appropriate staff member.
- Only Microsoft programmes are approved for automatic transcription or the minuting of meetings.
- AI may be used to support the creation of feedback banks or identify misconceptions in student work, provided no personal student data is uploaded to open generative AI tools. Where student work is to be uploaded to an AI system, consent must be gathered from pupils and parents as outlined in the school's AI policy.
- Staff should use professional judgement when identifying possible AI-misuse by pupils. AI-detection tools may be used as indicators but must not be treated as conclusive evidence.
- Staff must not input personal data (including names, photographs, SEN status, home addresses, medical information) into any public or open generative AI models (e.g. standard ChatGPT, Gemini, Claude).

- Staff members are not permitted to use AI to draft safeguarding logs (e.g. CPOMS) or make decisions regarding child protection thresholds.
- Staff must not create images or text using AI that violate the trust's Staff Code of Conduct, including discriminatory, sexually explicit, or violent material.
- Staff are responsible for ensuring that any AI-generated teaching resources are inclusive and free from gender, racial, or cultural bias before presenting them to pupils.
- The Trust reserves the right to review staff use of AI tools on trust devices

Appendix 2 –School AI policy template

Please see separate template document – School AI Policy