



Abbey Multi Academy Trust Policies & Procedures

Artificial Intelligence Policy

Approved on	30 June 2025
Approved by	Abbey MAT Board of Trustees
Next review due	29 June 2026

Artificial Intelligence Use Policy

1. Aims and Scope

At Abbey Multi Academy 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.

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. The policy supports the implementation of our Artificial Intelligence strategy.

This policy covers the use of AI tools by school staff, governors and pupils. It covers the use of generative chatbots such as Microsoft CoPilot, ChatGPT and Google Bard (please note, this list is not exhaustive). Microsoft Copilot is the Trust's solution.

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, governors 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, governors and pupils
- Protect the privacy and personal data of staff, governors 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 we 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
Fairness	<ul style="list-style-type: none">• Only use AI solutions that are ethically appropriate, equitable and free from prejudice – 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 governing board 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. Risk Appetite

The Trust is cautious in its approach to risk in relation to information technology and will tolerate proportionate risk in relation to adapting its practice and implementing new technological strategies and infrastructure.

The Trust is opposed to risk relating to cyber security and data protection therefore this policy and procedures pertaining to the use of AI consider the need to protect the Trust's intellectual property and comply with data protection policy and procedure.

The Trust is open to risk relating to teaching and learning and is prepared to tolerate proportionate risk in adapting its practice and implementing new initiatives and tools to improve the quality of education.

The Trust is open to risk relating to staffing performance and leadership being prepared to take some risk as a direct result from innovation as long as there is a development opportunity for staff.

Considering the Trust's risk across the areas identified above, the pace at which AI is developing and the accessibility to AI that already exists, the Trust is open in relation to the use of AI. Although the use of AI may carry potential or contribute to a high degree of residual risk in the early stages of the use of AI it has the potential to have a high degree of benefit and value for money

5. Roles and Responsibilities

5.1 Trust Board and Local Governing Bodies

The Trust board will:

- Take overall responsibility for monitoring this policy and holding leaders to account for its implementation in line with the Trust's AI strategy.
- The Trust Board's Audit and Risk committee have oversight of Artificial Intelligence from a risk and regulatory perspective. Other sub-committees will monitor the implementation of the Trust's AI strategy in the areas relevant to the committee's terms of reference.
- The Trust board and local governing bodies will:
 - Ensure the headteacher / principal is 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:
 - Use only approved AI tools (see section 5)
 - Seek advice from the data protection officer / IT support, as appropriate
 - Check whether they are using an open or closed generative AI tool
 - 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

5.2 Co-CEO / Director of Operations

The Co-CEO / Director of Operations will:

- Take responsibility for the day-to-day leadership and management of AI use across the Trust
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Ensure that the guidance set out in this policy is followed by central staff
- Ensure school leaders are implementing this policy in their respective academies
- Ensure that the guidance in this policy is disseminated to staff across the Trust
- Review and update this AI policy as appropriate, and at least annually
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, the Head of IT and Infrastructure, and data protection impact assessments

5.3 Headteacher / Principal

The headteacher / principal will:

- Take responsibility for the day-to-day leadership and management of AI use in the school
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- 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 pupils are taught about the effective use and potential risks of AI

5.4 Data protection officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO is Kerry Weatherill and is contactable via dpo@abbeytrust.org

5.5 Safeguarding lead

The safeguarding lead is 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)

5.6 All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy and in our AI guidance document.

To protect data when using generative AI tools, staff must:

- Use only approved AI tools
- Seek advice from the data protection officer / IT department as appropriate
- Check whether they are using an open or closed generative AI tool
- 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 pupils understand the potential benefits and risks of using AI in their learning. All our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

5.7 Pupils

Pupils must:

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

6. Staff, Trustees and Governors Use of AI

6.1 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 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.
- Always consider whether AI is the right tool to use. Just because the Trust has approved its use doesn't mean it will always be appropriate.

6.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the headteacher / principal to discuss any ideas they may have with regards to using AI, so the headteacher / principal can take the suggestions forward to the Trust AI working group if they deem it to be a satisfactory new method of working.

The Co-CEO / Director of Operations is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the Head of IT and Infrastructure, the DPO and data protection impact assessments.

6.3 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

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 the Trust's closed infrastructure, and where it is not stored in data centres compliant under GDPR.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Abbey Multi Academy Trust will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Please also refer to section 10 of this policy.

6.4 Intellectual property

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

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.

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.

6.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race and disability. This means that critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output before relying on it.

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 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.

6.6 Raising concerns

Trustees, governors and central staff should report any misuse of AI to the IT Team (it@abbeytrust.org) and the Co-CEO/Director of Operations.

Staff should report any misuse of AI to the IT Team (it@abbeytrust.org) and their headteacher / principal.

Pupils 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 Abbey Multi Academy Trust Complaints Policy & Procedure.

6.7 Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our equality policy 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

Staff, trustees and governors must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

7. Educating Pupils about AI

At Abbey Multi Academy Trust we acknowledge that 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 pupils develop the right skills to make the best use of generative AI.

Pupils are taught about the potential benefits of using AI tools to aid their learning, 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 Pupils

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

Pupils in our primary academies and in Key Stage Three will not use AI within their academy although they will be taught about the benefits and risks as part of the curriculum. 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 but may be used by secondary students (Key Stages 4 and 5), when explicitly instructed to by their teacher:

- 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

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, 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)

This list of AI misuse is not exhaustive.

Where AI tools have been used as a source of information, 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 plagiarism procedures as set out in the exam policy.

Pupils must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

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 / assessment policy for more details.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments. [Joint Council for Qualification \(JCQ\) AI Use in Assessments: Protecting the Integrity of assessments](#)

10. Staff Training

Staff will be trained on the use of AI to ensure they are kept up to date with developments and how they will be able to develop and improve their practice on a regular basis.

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 Trust)
- Any relevant passwords or login details

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

11.2 By Trustees and Governors

Trustees and governors found in breach of this policy will be dealt with in-line with our trustee and governor code of conduct.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with the academy behaviour 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 must be kept updated by the Co-CEO / Director of Operations whenever there is a significant change to either AI use by the Trust 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.

The policy will be shared with the Trust Board at least annually.

All teaching staff 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 pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in school.

13. Links with other policies and guidance

This AI policy is linked to our:

- Data protection policy
- Child protection and safeguarding policy
- Assessment policy
- Exams policy
- Homework policy
- Behaviour policy
- Staff code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy
- AI Guidance for Staff and Students

In addition, the Trust has published Acceptable Use Guidance which should be considered alongside this Policy. Abbey Multi Academy Trust staff can access AI-specific guidance and resources via the Exchange.

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