Use of artificial intelligence (AI) policy

Success Academy Trust

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1. Aims and scope

Here at Success 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 aware of the opportunities to help reduce staff workload, increase personalisation and improve teaching and learning. We similarly value the importance of preparing pupils for use and impact of AI in the future.

We are also aware of the risks posed by AI, including data protection breaches, hallucinations, 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 staff across the trust, trustees, local governors and pupils. This includes generative chatbots such as ChatGPT and Google Gemini.

This policy aims to:

> Support the use of AI to enhance teaching and learning

> Support staff across the trust to explore AI solutions to improve efficiency and reduce workload

> Prepare staff across the trust, trustees, local 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 across the trust, trustees, local governors and pupils

> Protect the privacy and personal data of all staff across the trust, trustees, local 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:

o AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence

o Generative artificial intelligence (AI) and data protection in schools, published by the Department for Education (DfE)

o This policy 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

As a trust, we follow the 5 principles set out in the AI regulation white paper.

REGULATORY PRINCIPLE	WE WILL …
Safety, security and robustness	• 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	• Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	• 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	• Ensure that the Success Academy Trust Board Of Trustees, Local Governing Bodies and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	• 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

Refer to SAT Scheme of Delegation SoD July 2025

4.0 Trust-level AI lead

Our AI trust lead is responsible for the strategic oversight of AI use across the trust with the support of the Trust Leader.

4.1 Board of trustees

The board of trustees will:

> Take overall responsibility for monitoring this policy and holding school leaders to account for its implementation

> Review and update the AI policy as appropriate

> Ensure school leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the trust

> Sign off on approved uses of AI, or new AI tools, taking into account advice from the data protection officer AI lead and Trust Leader

Trustees will adhere to the guidelines below to protect data when using generative AI tools themselves:

> Use only approved AI tools (see section 5 and appendix 1)

> Seek advice from the data protection officer / IT / AI lead/designated safeguarding leads (DSLs), 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

4.2 School leaders

School leaders will:

> Take responsibility for the day-to-day leadership and management of AI use in their school

> Liaise with the 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 Keeping Children Safe in Education and the school'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 pupils are taught about the effective use and potential risks of AI

4.3 Trust data protection officer (DPO)

The trust level 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 John Walker and is contactable via data@successat.org.uk

4.4 Designated safeguarding leads (DSLs)

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

4.5 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.

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

- Use only approved AI tools (see section 5 and appendix 1)
- Seek advice from the Data Protection Officer / IT lead / AI lead/DSL, as appropriate
- Report safeguarding concerns to the in line with the trust's child protection and safeguarding policies
- 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 AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs.

All staff play a role in ensuring that 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 Pupils

Pupils must:

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

5. Use of AI by staff across the trust, trustees and local governors

5.1 Approved use of AI

At Success Academy Trust we are committed to helping staff, trustees and local 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 local governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, trustees or local 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. For example, AI must not be used when reporting a safeguarding disclosure.

The table in the appendix sets out the approved AI tools and the approved uses for each tool.

5.2 Process for approval

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

Trust IT lead is responsible for signing off on approved uses of AI, or new AI tools, considering advice from 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 unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Success Academy Trust will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. SAT Data Protection Policy July 2025 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.

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.

Success Academy Trust will not allow or cause intellectual property, including pupils' work, to be used 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.

Success Academy Trust will ensure we can identify and rectify bias or error by training staff in this area.

We will 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 complaint's procedure.

5.6 Raising concerns

We encourage staff to speak to their school leader in the first instance if they have any concerns about the potential use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with the school's trust's child protection and safeguarding policy. Any staff concerns must be reported to the headteacher. Any trustees/governor concerns through the usual code of conduct.

5.7 Ethical and responsible use

Success Academy Trust will always:

> Use generative AI tools ethically and responsibly
> Remember the principles set out in our trust's 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 members, trustees and local governors must not:

> Generate content to impersonate, mislead, bully or harass another person

> Generate explicit or offensive content

> Input offensive, discriminatory or inappropriate content as a prompt

6. Educating pupils about AI

Here at Success 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 best use of generative AI.

> 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

7. Use of AI by pupils

Success Academy Trust recognises that AI has many uses to help pupils learn.

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

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 and follow guidance published by Joint Council for Qualifications (JCQ) on AI use in assessments.

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 or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils

> Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

Success Academy Trust will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

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

9. Staff training

Staff will be kept up to date with developments in AI through regular INSET training and Safeguarding training. Governors and Trustees will also be sent guidance on the use of AI within their remit as a governor or trustee. Staff will be able to develop and improve their practice with regular CPL, online courses and regular comms from Trust IT Lead on up to date developments.

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 from a child a report must be made to a DSL immediately. Where concerns are raised about a member of staff, this must be reported to the schools principal/headteacher.

Any such incident will be dealt with according to the procedures set out in the trust's child protection and safeguarding policies and child protection referral process.

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with the trust's 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.

> Refer to staff code of conduct policy

You must report any breach of this policy, either by you or by another member of staff, to your college/school principal/headteacher.

11.2 By trustees or local governors

Trustees or local governors found in breach of this policy will be dealt with using the code of conduct.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with the school's 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 Trust IT Lead 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 board of trustees regularly.

All teaching staff are expected to read and follow this policy.

IT Lead for the trust will monitor the effectiveness of AI usage across the trust.

We will ensure we keep members of the trust 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 across the schools in our trust.

Appendix 1: Approved uses of AI tools Trust

Note that open-source AI tools / open AI tools, meaning tools that anyone can access and modify, should only be used for tasks that don't require personal information to be input.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
ChatGPT (open)	- Teachers - Governors - Support Staff	- Lesson planning - Letter to parents/carers – no personal data - Job descriptions and adverts - Interview questions - LLM
Microsoft Copilot (open)	- Teachers - Governors - Support Staff	- Lesson planning - Letter to parents/carers - Job descriptions and adverts - Interview questions - LLM
Arbor AI (closed)	- Teachers - Support Staff	- Letter to parents/carers - Report creating - Ask Arbor - Intervention suggestions

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
Google Gemini (open)	- Teachers - Governors - Support Staff	- Lesson planning - Letter to parents/carers - Job descriptions and adverts - Interview questions - LLM
Securly (closed)	- Teachers - Governors - Support Staff - Students	- Filtering - Monitoring - LLM for students
SatchelOne	- Teachers - Support Staff	Homework setting
Twinkl AI TeachMate AI	- Teachers - Support Staff	- Report creating - Create presentation slides - Lesson planning
Gamma	- Teachers - Support Staff	- Create presentation slides - Lesson planning