Trust Use of Artificial Intelligence (AI) Policy

Approved by:	Trust Chief Executive Officer	**Date:** December 2025
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1. Aims and scope

Tudhoe Learning Trust understands 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.

This policy covers the use of AI tools by school staff, governors and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

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 all staff across the trust, trustees, local governors and pupils in compliance with the UK GDPR

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 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	- 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 governing board, governing bodies and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI

Regulatory principle	WE WILL …
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

Trust-level AI lead
Our generative AI trust lead is Tim Cassap. They are responsible for the strategic oversight of AI use across the trust.

Governing Body
The governing body will:
- Take overall responsibility for monitoring this policy and holding the Head Teacher to account for its implementation in line with the school's AI strategy
- Ensure Head Teacher are appropriately supported to make informed decisions regarding effective and ethical use of AI
- Adhere to the guidelines below to protect data when using generative AI tools themselves:
    o Use only approved AI tools (see section 5)
    o Seek advice from the data protection officer/IT/AI lead, as appropriate
    o Check whether they are using an open or closed generative AI tool
    o Ensure there is no identifiable information included in what they put into open generative AI tools
    o Acknowledge or reference the use of generative AI in their work
    o Fact-check results to make sure the information is accurate

Head Teacher
The Head Teacher 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

- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, AI lead and data protection impact assessments.

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 Gillian Pigott and is contactable via 01388 811765.

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

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)
- Seek advice from the Data Protection Officer/IT/ AI lead as appropriate
- Report safeguarding concerns to the DSL in line with the trust's child protection and safeguarding policy
- 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.

Pupils
Pupils must:
Follow the guidelines set out in section 6 of this policy ('Use of AI by pupils')

5.   Use of AI by staff and governors

Approved use of AI
We are committed to helping staff 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 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.

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

Given how rapidly AI is evolving, please note Trust Schools will keep an updated list of approved new AI tools

Approved Tools	Approved uses
KeyGPT	• Letter to parent/careers • Job descriptions and adverts • Interview questions
Gamma	Creating slides for a school setting
Arbor AI	Emails, SMS, Letters
Gemini	Writing Emails
Chat GPT	Support with research, lesson plans, writing emails, letters, policy writing
Claude 3	Newsletters, analysing anonymous data
Co pilot	Writing a job advert and creating interview questions, creating images to aid with learning
Notebook LM	Through google
Teacher GENie	AI Tool that is accessible through Century to help support learning through extending questions
Class Dojo	Support with research, lesson plans, writing emails and letters
Canva	Support with research, lesson plans, writing emails and letters
Teachmate	Support with research, lesson plans, writing emails and letters

A note on your data security in KeyGPT: This is The Key's AI-powered assistant for schools, included in your membership. KeyGPT is a closed generative AI tool, which uses published content from The Key to improve the quality of its response, known as retrieval augmented generation (RAG). The Key has prompted the AI to give you more complete, specific responses, and instruct the AI to limit bias as much as possible. However, all AI models can make mistakes, so do check any important information KeyGPT gives you.

Process for approval
Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their Head Teacher 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 and to discuss approved tools.

The Head Teacher should discuss any concerns with the Trust AI Lead or DPO.

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, the 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.

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.

Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected 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.

The 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 because of AI use, these will be dealt with through our usual complaints policy and procedure.

Raising concerns

We encourage staff and governors to speak to their Head Teacher in the first instance if they have any concerns about the proposed 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.

Ethical and responsible use

The 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 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

6. Use of AI by pupils

The 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

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.

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
- Input offensive, discriminatory or inappropriate content as a prompt

7. Formal assessments

The 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.

8. Staff training

Staff will be kept up to date with developments in AI, and how they will be able to develop and improve their practice on a regular basis.
- How you ensure good understanding of AI
- Covering AI use in staff training on safe internet use and online safeguarding
- Who will be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI
- How the trust will stay abreast of good practice and what mechanisms you have in place for sharing it

Staff can access training through the National College - AI & Online Safety: Mitigating Risks & Compliance.

9. 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 a report must be made to the DSL immediately.

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

10. Breach of this policy

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. This may involve providing the trust with access to:
- The generative AI application in question (whether 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 your senior leader immediately.

By governors
Governors found in breach of this policy will be dealt in line with the Governor Code of Conduct.

By pupils
Any breach of this policy by a pupil will be dealt with in line with the School's Behaviour policy

11. 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 Trust AI 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 Directors at least annually.

All teaching staff are expected to read and follow this policy. The Head Teacher is responsible for ensuring that the policy is followed and will monitor the effectiveness of AI usage across their school.

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.

12. Links with other policies

This AI policy is linked to our:
Data protection policy
Child protection/safeguarding policy
Homework policy
Behaviour policy
Staff code of conduct

Marking and feedback policy
ICT acceptable use policy
Online safety policy
Equality policy