



ACADEMY TRUST

## Use of Artificial Intelligence Policy

*(NOTE: To be read in conjunction with ONE Academy Trust Risk Register)*

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### Associated Documents:

ONE Academy Trust AI Risk Register (published separately)

## 1. Purpose

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- 1.1 This policy outlines the ethical and compliant use of Artificial Intelligence (AI) technologies in schools and across ONE Academy Trust. It is aimed at ensuring that AI is used responsibly, in line with data protection laws (including GDPR), and with consideration for the rights and well-being of all pupils, staff, and stakeholders. The policy is to be read in conjunction with ONE Academy Trust's AI Risk Register.

## 2. Understanding AI and Generative AI

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### What is AI?

- 2.1 Artificial Intelligence (AI) involves systems capable of performing tasks that typically require human intelligence, such as visual perception, speech recognition, and decision-making.

### What is Generative AI?

- 2.2 Generative AI is a subset of AI that can create new content, such as text, images, or music, by learning from existing data. It differs from general AI in that it can generate original outputs rather than just analyse or process data. For instance, in education generative AI may be used to design curriculum planning, create policy templates and teacher resources.

## 3. Scope

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- 3.1 This policy applies to all personnel (including staff, contractors, and third-party providers) who use or engage with AI technologies within our schools or across the MAT environment in any capacity

or context. Pupils are currently not permitted to use AI within ONE Academy Trust schools. Examples (non-exhaustive) of engagements are listed below:

- Curriculum development and preparation of teaching resources
- Adaptive learning platforms
- Automating Reports and Data
- Attendance monitoring
- Scheduling
- Language translation
- Chatbots
- Administrative tasks
- Clerking services

#### **4. Principles for the use of AI**

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4.1 At ONE Academy Trust we have identified the following guiding principles for selecting and using AI within our settings. The ethical usage of AI ensures that AI systems are deployed in a way that aligns with moral principles and promotes fairness. ONE Academy Trust reserves the right to update these in accordance with evolving technologies and updates within the sector, or government legislation.

##### **Educational Value:**

4.2 AI tools must serve an educational purpose and support teaching, learning, or administrative efficiency.

##### **Transparency:**

4.3 The use and purpose of AI must be transparent to staff, students and parents. All stakeholders should be informed about the use of AI, what data it processes, and how outcomes are determined. Stakeholders will be informed about the use of AI via a 'Transparency Statement' available from all school websites. This AI policy will also be made available via ONE Academy Trust's website

##### **Beneficence and Avoidance of Harm**

4.4 AI tools should be deployed to enhance education and wellbeing, avoiding harm to individuals, community or the environment

##### **Inclusivity and Accessibility**

4.5 AI must be implemented in a way that is accessible to all identified user groups, ensuring that its benefits are equitably distributed across these identified users

##### **Accountability:**

4.6 ONE Academy Trust/School remains accountable for any decisions made or supported by AI.

4.7 Human oversight is required to ensure that AI recommendations are appropriate and fair.

4.8 Regular reviews and clear ways to assess/evaluate the impact of AI in the classroom will be established

## **Fairness:**

4.9 *Ensuring that AI tools do not perpetuate bias.* Select AI applications that have been tested for fairness and are designed to mitigate bias.

## **Privacy and Security:**

4.10 *Protection of personal data of staff and pupils.* Ensuring all AI tools comply with data protection regulations such as GDPR.

## **5. GDPR and Data Protection Compliance**

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### **Data Minimisation**

5.1 AI systems must only collect and process personal data necessary for their specific purpose. ONE Academy Trust will conduct regular audits of the data processed by AI tools to ensure compliance with this principle. ONE Academy Trust will complete Privacy Impact Assessments (PIA- see below) or equivalent risk assessments to assess the risks surrounding data. Data inputted/uploaded to AI tools should remain generic and uploaded locally (not via access to OneDrive)

### **Lawful Basis for Processing**

- 5.2 Every AI tool must identify and document the legal basis for processing personal data. Common legal bases under GDPR may include:
- **Consent:** If AI systems require the processing of sensitive personal data, explicit consent from the data subject (or their guardian) is often necessary.
  - **Public Task:** Processing may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
  - **Legitimate Interest:** When processing is necessary for the school's legitimate interests, but only if these interests are not overridden by the rights and freedoms of the data subject.
- 5.3 A legal basis must be clearly communicated to data subjects in an understandable and accessible manner.

### **Data Subject Rights**

- 5.4 AI systems must be designed to uphold data subject rights under GDPR. These include:
- **Right to Access:** Pupils, parents, and staff must be able to request and receive a copy of their data processed by AI systems.
  - **Right to Rectification:** Inaccurate or incomplete personal data must be corrected promptly.
  - **Right to Erasure (Right to be Forgotten):** Data subjects may request the deletion of their data, especially if it is no longer necessary for the purpose it was collected.
  - **Right to Object:** Data subjects can object to the use of AI for certain purposes, especially if it involves profiling or automated decision-making.
  - Schools must establish clear procedures for handling these rights requests in a timely manner.

## Privacy Impact Assessments (PIA)

- 5.5 Before deploying any AI tool that uses personal data, ONE Academy Trust/School must conduct a Privacy Impact Assessment and/or risk assessment (refer to ONE Academy Trust's AI Risk Register) to:
- Identify potential risks to data privacy and security.
  - Analyse how these risks can be mitigated or eliminated.
  - Document the assessment and share it with stakeholders as required.
  - A PIA should be reviewed regularly to ensure continued compliance, especially when the AI system undergoes significant changes.

## Data Security

- 5.6 AI systems must implement robust security measures to protect personal data from unauthorised access, breaches, or loss. This includes:
- **Data Encryption:** Encrypting data both in transit and at rest.
  - **Access Controls:** Restricting access to data to authorised personnel only, with role-based permissions.
  - **Anomaly Detection:** Using AI or other tools to detect and respond to potential security threats or breaches.
- 5.7 In case of a data breach, schools must have an incident response plan that includes notifying affected individuals and the Information Commissioner's Office (ICO) within the required timeframe. In ONE Academy Trust schools, the reporting mechanism is via the Headteacher and/or the school Office Manager who will record the incident on the SchoolPro Portal without delay. Advice may be sought from Governance Professional (d.dakin@oneacademytrust.co.uk)

## 6. Ethical Considerations

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- 6.1 AI systems must be regularly audited to ensure they are free from bias and do not disproportionately affect any group of pupils or staff. Steps must be taken to correct any identified biases. AI should not discriminate against individuals based on characteristics such as age, race, gender, or socioeconomic status. The use of AI should prioritise the well-being and safety of pupils and staff. Its ethical usage should also safeguard the sensitive data of pupils and educators, fostering a safe learning environment.
- 6.2 Integrating ethical principles in AI use within education promotes trust, accountability, and inclusivity, aligning with the core educational values of fairness, respect, and the holistic development of every child.
- 6.3 AI tools must not create undue stress or pressure on pupils, and safeguarding concerns must be a priority. When AI is used in a way that directly impacts pupils or staff, informed consent should be obtained where required by law.
- 6.4 Ethics in AI is vital in education because it ensures that AI technologies are used in ways that are equitable, transparent, and respect the privacy and dignity of pupils and staff. Ethical AI helps prevent biases that can affect learning outcomes, ensuring all pupils have equal opportunities.

## 7. Implementation and usage

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- 7.1 **Training:** All staff involved in the use of AI technologies must receive training on ethical AI use, data protection, and the potential impacts of AI on education.
- 7.2 **Compliance:** Use AI tools that comply with data protection regulations. For instance, ensure tools adhere to GDPR standards. Data impact assessments and/or risk assessments (refer to ONE Academy Trust's AI Risk register) must be in place prior to usage. Staff must use work accounts to access AI for work related purposes and reference approved AI lists before registering. The approved AI list is available from the Trust AI Risk Register located within the 'Access All Policies' SharePoint site. Please note: This is a live document and will be updated from time-to-time. Please check for the latest version.
- 7.3 **Consent:** Refer to risk mitigations within ONE Academy Trust's AI Risk Register. ONE Academy Trust does not support the inputting of personal data into non-approved and non-GDPR conformed AI tools. Where this is the case consent must be sought before processing personal data with AI. This includes informing parents about the AI tools being used and securing their permission.
- 7.4 **Audit:** Regularly audit AI tools to ensure fairness and inclusivity. This involves checking for bias and ensuring the AI applications promote equality and diversity.
- 7.5 **Review:** The implementation and impact of AI tools must be regularly reviewed to ensure they align with educational goals and ethical standards. Adjustments should be made based on new developments and feedback from stakeholders.
- 7.6 **Age Appropriateness:** Most AI software is designed for users aged 13 and above and is **not** suitable for primary-aged children. For example, tools like ChatGPT and certain AI-driven educational platforms have age restrictions due to privacy laws and content suitability. ONE Academy Trust does not support the usage of AI tools with pupil interactions.

## 8. Third-Party Providers

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- 8.1 Before engaging with third-party AI providers, due diligence will be performed to ensure compliance with GDPR and ethical guidelines. Contracts must outline data protection responsibilities.
- 8.2 Any third-party service processing personal data must have a clear data processing agreement (DPA) in place, specifying their role and the data protection measures in place.
- 8.3 The schools IT support team should conduct the relevant due diligence prior to any AI being used in an educational setting to ensure the compliance of the software, GDPR and address stakeholders privacy concerns.

## 9. Review and Compliance

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- 9.1 This policy, alongside the accompanying risk assessment, will be reviewed annually via employee consultation and input from Trust IT providers to ensure it remains compliant with legal requirements and reflects best practices in AI use in education.