SHARE
MULTI-ACADEMY TRUST

ARTIFICIAL INTELLIGENCE (AI) POLICY

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1. Introduction & Purpose

SHARE Multi-Academy Trust acknowledges the potential for Artificial Intelligence (AI) to enhance how our schools and trust operate, as well as the learning experience of our pupils. We believe in responsibly leveraging technology to support our staff and pupils, enabling them to reach their full potential.

This policy outlines our approach to integrating AI responsibly into how we operate across the trust and how we deliver learning, enabling everyone to benefit from modern technologies, educating them about safe, legal, responsible and ethical AI use.

We recognise the guidance set out in the Department for Education's Statement on Generative Artificial Intelligence in Education. This policy has been informed by that guidance.

All users of generative AI will comply with relevant laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. We will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts them at greater risk. Staff will not provide intellectual property, including pupils' work, to be used to train Generative AI models without appropriate consents or exemptions in place.

2. Definitions of AI

Artificial Intelligence (AI)

A branch of computer science that aims to create systems capable of performing tasks that would normally require human intelligence. These tasks include learning from experience, understanding natural language, recognising patterns, solving problems and making decisions.

Machine Learning (ML)

A subfield of AI focused on using data and algorithms that give the system the ability to 'learn' from data, gradually improving its accuracy. The goal of ML is to derive an algorithm for the solution of a task without being given explicit instruction. The terms AI and ML are often used interchangeably even though they are conceptually different.

Generative Pre-trained Transformers (GPT)

A type of large language model (LLM) and used by well-known AI products such as Copilot and ChatGPT. These products use a GPT to produce content in response to prompts which the user inputs.

3. Guiding Principles

When we invest in, implement and use AI in our schools we follow these key principles:

Equity and inclusion

We commit to deploying AI technologies in a way that is equitable and promotes inclusion, addressing biases and ensuring fair access to educational opportunities for all pupils.

Transparency

We will be transparent and accountable in all decisions related to the use of AI. We will ensure that all stakeholders including pupils, families, staff and governors understand how and where it is used and the effects on teaching and learning.

Privacy

We apply strict data protection standards, including safeguarding student and staff data used in AI applications.

Accountability

We hold ourselves accountable for the ethical design, development, and implementation of AI systems, regularly reviewing their impact and efficacy.

Value of AI

We will consider how AI applications align with the curriculum scope and objectives and serve to improve teaching and learning experiences and outcomes for pupils. We will understand its benefits and limitations. In all uses of AI, we will understand that it must be used in conjunction with our people, not to replace them.

Wellbeing and workload

We will use AI as both an administrative and educational tool to help staff manage their workload, rather than increasing it. Our goal is to enhance and streamline operations to maximise time and resources available for teaching and learning. By doing so, we aim to support our staff's workload and work-life balance, ensuring their wellbeing is not adversely affected.

4. Roles and responsibilities

The Trust Board will be responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Reviewing this policy on an annual basis.

The Trust's Executive Leadership Team will be responsible for:

- Ensuring that this policy is understood by trust staff, pupils and other stakeholders, such as parents.
- Holding headteachers and other leaders to account for proper use of AI in schools.
- Checking this policy and relevant procedures are followed consistently.
- Recommending further policy amendments to the board.

- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.

The Local Governing Body will be responsible for:

- Ensuring their own knowledge of the use of AI tools in the school is up to date.
- Checking how well the policy is applied in the school.
- Learning more the impact of AI in their setting.
- Advising the board if the policy needs further amendment.

The headteacher/principal will be responsible for:

- Ensuring that staff receive regular, up-to-date training on how to use AI tools in school.
- Ensuring that the use of AI tools in the school is integrated into relevant policies and procedures, the curriculum and staff training.
- Communicating with parents to ensure they are kept up to date with how AI tools are being used in the school, how this will impact pupils' education and how the school is ensuring the tools are being used safely and effectively.
- Ensuring that AI practices are audited and evaluated on a regular basis.
- Taking the lead responsibility for online safety in school.
- Undertaking training so they understand the risks associated with using AI tools in school.
- Maintaining records of reported online safety concerns relating to the use of AI tools, as well as the actions taken in response to concerns.
- Reporting to the local governing body about the use of AI tools and how it links to safeguarding.
- Ensure that pupils, staff and parents aware of the rules and regulations relating to the use of AI in public examinations.

IT technicians will be responsible for:

- Providing technical support and advice in the development and implementation of the school's AI practices, policies and procedures.
- Implementing appropriate security measures.

The Data Protection Officer will be responsible for:

- Keeping up-to-date and informed with AI technologies relevant to the trust.
- Understanding and maintaining awareness of what the use of AI means for data protection in the school.
- Reporting of any relevant to the Trust Board and the ICO.

All staff members will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Taking responsibility for the security of the AI tools and data they use or have access to, strictly ensuring that no personal data is input into AI tools.
- Modelling good online behaviours when using AI tools.
- Maintaining a professional level of conduct in their use of AI tools.
- Having an awareness of the risks that using AI tools in school poses.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring that the safe and effective use of AI tools is embedded in their teaching of the curriculum.
- Familiarising themselves with any AI tools used by the school and the risks they pose.
- Ensuring they do not plagiarise the work of others, break copyright rules or falsely claim work as their own.

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from the relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools.
- Reporting concerns in line with the school's reporting procedure.
- Familiarising themselves with any AI tools used by the school and the risks they pose.

5. Guidelines for staff

Staff must not share personal or confidential information with AI tools without permission from their manager.

Staff are permitted to explore and use AI-based tools and technologies to support their work where no proprietary or personal information is shared with the AI tool. Examples may include use of licensed AI tools for lesson planning, production of curriculum materials, and administration. Staff must be transparent with their manager about their use of generative AI.

Staff must ensure that any potential new use of AI tools is assessed to consider if a Data Protection Impact Assessment is required.

AI tools will be used responsibly, ensuring they complement expertise but do not create a substitute for professional judgement. Staff remain professionally responsible and accountable for the quality and content of any output they have generated using AI.

Understanding Generative AI

Staff receive training on the capabilities and limitations of Generative AI tools like ChatGPT and Google Gemini, including an awareness of bias, accuracy and currency. They learn to quality-assure and fact-check the results and use AI-generated content responsibly in their teaching materials.

Professional judgement

Staff exercise professional judgement in checking AI-generated content for accuracy, relevance, and appropriateness before use in educational settings. They are expected to provide context, and supplement AI-generated materials with their expertise.

Personalisation and learning

Staff must promote equity in education by considering use of AI to address learning gaps and provide personalised support, preparing all pupils for a future in which AI technology will be an integral part, being mindful of disparities in opportunities for different pupils.

Data protection and Intellectual Property

Personal data must not be entered, uploaded, pasted or otherwise submitted to AI tools including Copilot, unless staff hold an enhanced Copilot licence. This includes prompts, documents, images, audio recordings and chat history containing information that identifies, or could identify, a pupil, parent/carer, employee or other individual.

This restriction helps the trust protect personal data wherever possible.

Using AI tools may result in personal data being processed, retained or accessed outside the trust's control, potentially making it available to third-party providers or a wider audience. This increases the risk of unauthorised access and data breaches.

Staff must use anonymised information when using AI tools. Any suspected disclosure of personal data to an AI tool must be reported immediately in line with the trust's data breach reporting procedure.

Staff also need to respect pupils' intellectual property rights, ensuring that original work (including homework) is not used to train AI models without appropriate consent or exemption to copyright.

Teaching staff will emphasise to pupils the importance of critical thinking, creativity, and originality in their work. Clear guidelines and expectations will be communicated to pupils regarding the appropriate use of generative AI tools for homework and during assessments, ensuring that their work reflects their own efforts and understanding.

All staff, including school leaders, are responsible for reading and understanding this policy before using any AI technology. Staff must report any suspected breaches of this policy to the Trust Data Protection Officer, Jayne Newson, Jayne.newson@sharemat.co.uk.

6. Guidelines for Pupils

Pupils must be clear and transparent where work has been generated with the help of AI.

Understanding Generative AI

Pupils are educated on the capabilities and limitations of the most widely available, age-appropriate, Generative AI tools, empowering them to critically evaluate AI-generated content. They learn to discern between reliable and unreliable information and use AI tools responsibly.

Responsible use

Pupils are [encouraged/allowed] to use AI tools as aids to supplement their understanding rather than relying on AI-generated content. They are taught to quality-assure and fact-check information and get help from teachers and support staff when needed. Pupils are taught not to enter personal details or sensitive information into Generative AI tools.

Digital citizenship

Pupils are trained in digital citizenship and online safety, including understanding the implications of sharing personal data and intellectual property online. They learn to protect their privacy and respect the intellectual property rights of others in digital environments.

Public examinations

Pupils must not use AI in any work they are submitting as part of a public examination or any other qualification. Pupils must adhere to the rules and guidance described by Ofqual, examination awarding bodies or any other regulatory body.

7. Risk management

SHARE Multi-Academy Trust complies with its statutory obligations and is committed to ensuring that the use of Artificial Intelligence (AI) technologies aligns with its safeguarding obligations and complies with data protection legislation, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, as well as policies on cyber security and acceptable use. AI systems deployed within the Trust are assessed for potential risks to children's welfare, including the unintended exposure to harmful content, biases, or breaches of confidentiality. Personal data processed by AI tools are subject to strict access controls, anonymisation where feasible, and robust security measures to prevent unauthorised access or misuse.

Bias and discrimination

We are committed to fairness and equality; we will reduce the risk of unfair outcomes by upskilling our staff to understand the potential for bias in AI-generated content and to monitor AI outputs to ensure fairness and equality.

Data security

Cybersecurity measures are implemented to prevent data breaches and unauthorised access to sensitive information, including AI-generated content.

Educational integrity

Measures are taken to prevent misuse of AI in assessments and safeguard the integrity of qualifications.

Online safety

Guidance is provided to protect against harmful or inappropriate content online, including content generated by AI.

8. Related Policies

SHARE MAT General Data Protection Regulation Policy

SHARE MAT ICT Policy and Procedure

SHARE MAT Online Safety Policy and Procedure

SHARE MAT Staff Code of Conduct Policy and Acceptable Use of ICT Agreement

SHARE MAT Safeguarding and Child Protection Policy and Procedure

SHARE Multi Academy Trust - Privacy Notices

9. Useful Links and Resources

We recognise that AI is a constantly evolving landscape, and that strengths, weaknesses, opportunities and threats of this technology are not fully understood as yet. We will continue to collaborate with colleagues and wider partners to ensure that our ways of working are reviewed regularly and are fit for purpose.

We will gather feedback from pupils, families, staff and other stakeholders, and engage in ongoing national research to refine our use of generative AI, address concerns, and adapt to evolving educational needs.

More information can be found on the links below.

Generative artificial intelligence (AI) in education - GOV.UK

Generative AI: product safety expectations - GOV.UK

AI Use in Assessments: Protecting the Integrity of Qualifications - JCQ Joint Council for Qualifications

Updating the JCQ guidance on AI Use in Assessments - JCQ Joint Council for Qualifications

Guidance from the Information Commissioner's Office (ICO) (March 2023): Guidance on AI and data protection | ICO

Teacher Development Trust AI ebook UK final (tdtrust.org)