# *Thinking Schools Academy Trust*
# "Transforming Life Chances"

# Artificial Intelligence (AI) Use Policy

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| This policy was adopted on | January 2026 |
| The policy is to be reviewed on | July 2026 |

## Contents

## Policy Statement

Artificial Intelligence (AI) is transforming the educational landscape, offering both opportunities and challenges for schools and trusts. The Thinking Schools Academy Trust (TSAT) recognises the growing influence of AI—particularly Generative AI—and its potential to enhance teaching, reduce workload, and support personalised learning. However, with these benefits come responsibilities around ethical use, data protection, and safeguarding, especially in environments involving children and young people.

This policy sets out TSAT's principles and expectations for the responsible use of AI across its schools. It provides clear guidance for staff, students, and stakeholders on how AI should be integrated into educational practice, ensuring alignment with the Trust's mission to "Transform Life Chances." The policy also reflects national guidance and regulatory standards, promoting safe, transparent, and purposeful use of AI technologies in education.

## Purpose

At Thinking Schools Academy Trust our strategic aims for the use of AI are to;

- Use AI to improve efficiency within school activities and operations
- Upskill staff and students to be confident users of AI, able to maximise the benefits and minimise the risks of using AI
- Use AI to enhance the teaching and learning experience for all students, leading to better outcomes

Artificial Intelligence (AI) is a rapidly evolving technology that has significant potential for both positive and negative impact, in education and wider society. Generative Artificial Intelligence (GenAI) is a relatively new form of AI that has captured the imagination of the general population and commercial enterprises. Therefore, society is experiencing rapid growth in its use as an easy to access, easy to engage with, 'in your pocket' technology available on smart mobile phone, tablets, laptops, and desk-top computers, and it is likely that more types of devices will enhance access to such tools in the near future.

This rapid evolution of AI means policies and guidance will need to continue to be developed, refined and updated to reflect emerging functionality and trends. This is highly challenging, and users of AI need to be prepared to reflect carefully on how they use AI in line with the principles set out here in such new contexts.

In education, AI presents opportunities to reduce workload for the school and trust workforce, to enhance personalised learning, support professional development, and more. It also increases the chance that students will overly use AI, particularly Generative AI, to complete their schoolwork and assessments, and more. There are also safeguarding risks schools and trusts need to be mindful of. The focus of the use of AI shouldn't be the model itself. Drivers such as workload reduction without compromising quality but supported by AI are more effective.

This Artificial Intelligence (AI) Policy should be read and considered alongside other school and trust policies and guidance, including:

- Code of Conduct
- Data Protection Policy
- Disciplinary Policy & Procedure
- E-Safety Policy
- ICT Acceptable Use Policy
- Cyber Incident Plan
- Safeguarding Policy
- The TTL TEP (Trust Expectations and Principles) document

- Other policies introduced relevant to AI.

In addition, the Trust has published Acceptable Use Guidance which should be considered alongside this Policy. Thinking Schools Academy Trust staff can access AI-specific guidance and resources via the Trust Intranet website: Artificial Intelligence.

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.

## Scope

This policy applies to all staff, students/students/young people, and stakeholders within the Trust who engage with AI technologies in any capacity.

## Principles

TSAT will use AI in ways that support its mission to Transform Life Chances, ensuring the effective use of AI has a positive impact on the young people it serves, its staff and the wider school community. It will achieve this by following these guiding principles;

1. **Human Oversight and Accountability**
   - Maintain human oversight in all AI applications to ensure responsible use. Establish clear accountability for decisions made using AI, ensuring ownership and transparency in outcomes.

2. **Safety, Ethics, and Data Protection**
   - Ensure all AI applications and their use adhere to the highest standards of safety, ethical considerations, and data protection. This includes safeguarding student and staff privacy and maintaining transparency in AI usage.

3. **Child First Approach**
   - Prioritise the experiences and needs of students in all AI implementations. Engage with student voices to ensure they are aware of, and benefit from AI tools, enhancing their learning journey.

4. **Future-Proofing and Innovation**
   - Continuously anticipate and adapt to future technological advancements to keep AI applications relevant and effective. Balance innovation with caution to ensure sustainable and forward-thinking AI integration.

5. **Alignment with Trust Vision**
   - Ensure all AI initiatives align with the overarching vision of the Trust. AI should support the mission to transform life chances and contribute positively to the educational environment.

6. **AI Literacy and Personal Development**
   - Promote AI literacy among both staff and students. Prepare them for the future by integrating AI education into the curriculum and providing ongoing professional development to prevent over-reliance on AI.

7. **Regular Review and Adaptation**
   - Implement a dynamic approach to AI governance, regularly reviewing and updating policy and practices. This ensures that AI use remains effective, relevant, and aligned with the evolving educational landscape.

## Human Oversight and Accountability

Human oversight ensures that AI remains a tool to support, not replace, professional judgement. Decisions impacting students, staff, or operational processes must always involve a human review to maintain ethical integrity and accountability. Clear ownership of AI-driven outcomes prevents ambiguity and reinforces trust in decision-making. This principle safeguards against over-reliance on automation and promotes transparency.

## Safety, Ethics and Data Protection

Thinking Schools Academy Trust encourages the careful and considerate use of Artificial Intelligence (AI) but advises using Generative AI cautiously. Users must adhere to this guidance and policy, other related school and Trust policies, and that provided in national guidance and policies. Users must be familiar with and adhere to all related policies applicable to the use of AI. Appendix B provides some example staff uses with guidance.

Staff should access AI-related training provided by the Trust, school, and/or other relevant providers based on the need of their school or organisation.

Data protection is everyone's responsibility. 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 Trust's closed infrastructure, and where it is not stored in data centres compliant under GDPR.

If personal or sensitive data is to be used with Generative Artificial Intelligence, the user must have an active and paid for Microsoft Copilot Pro with commercial data protection license associated with their work Microsoft 365 account provided, funded and managed by the trust. Microsoft Copilot Pro is the Trust's solution. At the time of writing Microsoft Copilot should not have personal or sensitive data entered into it, but this is currently being reviewed and staff will be updated if this changes.

We are committed to the principles of data minimisation and purpose limitation. This means that personal data will only be used when it is necessary for a specific task and only for the specified, explicit, and legitimate purposes for which it was collected.

For example, when staff use AI tools to create reports or support administrative tasks, they must ensure that data is anonymised or pseudonymised wherever possible, using only the minimum amount of personal data required to achieve the intended purpose.

Our broader commitment to the data protection principles set out in the UK GDPR and Data Protection Act 2018 is outlined in our Data Protection Policy, which underpins this and all related practices.

The Trust is also committed to upholding children's data rights in the context of AI. Any use of artificial intelligence involving, or potentially impacting, children will be carefully assessed to ensure that it is ethical, transparent, and demonstrably in the best interests of the child. This includes applying enhanced safeguards, minimising data use, and ensuring that AI tools are used only where they support and protect the welfare, learning, or development of children.

Incidents of inappropriate use of Generative Artificial Intelligence, including the use of personal and/or sensitive data, or generating or requesting of sexualised imagery of others including “nudify” tools, will be dealt with in line with relevant school and Trust Data Protection policies/procedures and, if necessary, associated Human Resources policies and procedures including the Disciplinary Policy & Procedure.

Generative AI may present plausible information that is: inaccurate; inappropriate; biased; reinforces stereotypes; taken out of context and without permission; misinformation; and out of date; and unreliable. Hallucinations occur when AI detects patterns or objects that don't exist, leading to outputs that are incorrect or meaningless. Users should only use information if they are qualified to verify its accuracy. Users must quality assure the output before deciding to use it.

Staff must not allow or cause intellectual property, including students’ work, to be used to train Generative AI models, without appropriate consent or exemption to copyright. Students’ work should not be used to train Generative AI without written parental consent (if the student is aged under 18) or written consent from the student (if aged 18 or over).

Staff, students and related stakeholders administering or undertaking assessments, including GCSE and A-level, should be informed about JCQ regulations and requirements at an appropriate time.

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.

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. Thinking Schools Academy Trust primarily sees Generative AI models as a tool for staff. Appendix A provides some example staff uses with guidance.

Staff should report any misuse of AI to Thinking Technology/Headteacher. Students 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 Thinking Schools Academy Trust Complaints Policy & Procedure.

Regular updates will be communicated to staff and pupils when applicable, acknowledging that AI is a developing technology.

Staff and pupils should have sufficient knowledge and guidance to ensure that they can recognise where AI is useful, and when AI is counterproductive.

## Child First Approach

AI should enhance the learning experience without compromising student welfare or autonomy. Child-first means using AI tools in a way that benefits the young people we serve, ensuring we consider inclusivity, accessibility, and developmental appropriateness. Engaging student voice in AI adoption is critical to ensure the TSAT strategy meets the needs of its students, who must be prepared for a world that will fully embrace AI. This principle also aligns with the Trust's safeguarding obligations.

## Future-Proofing and Innovation

Education must anticipate technological evolution while maintaining stability and security. Future-proofing involves investing in adaptable systems, continuous staff training, and proactive risk assessment. Innovation should be balanced with caution, ensuring that new tools undergo rigorous evaluation before integration. It is important that the Trust stay up to date with technological developments, so we are well placed to take advantage of potential benefits but also mitigate risks and adjust policy and practice where needed. This principle positions the Trust to remain agile and competitive in a rapidly changing digital landscape.

## Alignment with Trust Vision

AI initiatives should directly support the Trust's mission to 'Transform Life Chances.' This means prioritising tools that enhance the teaching and learning experience, reduce workload, upskill staff and students, and enhance student outcomes. Alignment prevents fragmented adoption and ensures that technology investments deliver measurable impact. By embedding AI within strategic objectives, the Trust reinforces its values and educational purpose.

## AI Literacy and Personal Development

Building AI literacy among staff and students is essential for responsible use. Training should cover ethical considerations, data privacy, and critical evaluation of AI outputs. For students, AI education prepares them for future careers while promoting digital resilience. For staff, professional development mitigates risks of misuse and fosters confidence in leveraging AI effectively.

## Regular Review and Adaptation

AI governance must remain dynamic to reflect technological and regulatory changes. Regular reviews ensure that policies stay relevant and effective, addressing emerging risks and opportunities. Adaptation involves stakeholder feedback, compliance checks, and iterative improvements to maintain trust and accountability. This principle underpins sustainable and ethical AI integration across the Trust.

## Trust Acceptable Use Guidance and Resources

Thinking Schools Academy Trust has created a range of guidance and resources. These are available at Artificial Intelligence.

## Review

This policy will be reviewed regularly to ensure it remains relevant and effective in the face of technological advances and changing educational needs.

## Appendix A - National Guidance

A brief summary of and/or link to some of the key considerations are provided below. Users must consider the full guidance.

### Keeping Children Safe in Education (KCSIE)

KCSIE states:

> *All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues.*

*DfE (Department for Education) states:*

> *[Schools and colleges should] ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through Generative AI - keeping children safe in education provides schools and colleges with information on:*
> - *what they need to do to protect students and students online*
> - *how they can limit children's exposure to risks from the school's or college's IT system*

KCSIE is available here:
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

### Department for Education (DfE) Generative AI in Education

DfE guidance is available here:
https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education

### Ofsted's approach to artificial intelligence (AI)

Ofsted states:

> *Ofsted will not directly inspect the quality of AI tools. It is through their application that they affect areas of provision and outcomes such as safeguarding and the quality of education. Leaders, therefore, are responsible for ensuring that the use of AI does not have a detrimental effect on those outcomes, the quality of their provision or decisions they take.*
>
> *Ofsted supports the use of AI by providers where it improves the care and education of children and learners. We recognise that these tools can help providers make better-informed decisions, reduce workload and lead to innovative ways of working.*

| **Regulatory principle** | **Providers are expected to…** |
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| **Safety, security, and robustness** | Assure themselves that AI solutions are secure and safe for users and protect users' data.<br><br>Ensure they can identify and rectify bias or error. |
| **Appropriate transparency and explainability** | Be transparent about their use of AI, and make sure they understand the suggestions it makes. |
| **Fairness** | Only use AI solutions that are ethically appropriate – in particular, we expect providers to consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate. |

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| **Accountability and governance** | Ensure that providers and their 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.<br><br>Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment. |

Ofsted's guidance is available here:
https://www.gov.uk/government/publications/ofsteds-approach-to-ai

**Joint Council for Qualification (JCQ) AI Use in Assessments: Protecting the Integrity of Assessments**

https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/

**Information Commissioner's Office (ICO) Guidance on AI and Data Protection**

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/

## Appendix B - Information for parents and carers

At Thinking Schools Academy Trust, we are dedicated to giving your child(ren) the best education possible. We also care about our teachers and staff, helping them to do their best for our schools and communities.

We are using technology called Artificial Intelligence (AI) to help us. This includes Generative AI tools like Microsoft Copilot and other approved AI educational resources. Our teachers and staff are learning how to use these tools to make learning even better for your child(ren) or to reduce their workload so they can focus more on what happens in the classroom. We have groups of school leaders, teachers, and support staff working together to understand how AI can help and what we need to be careful about. We have also created training programmes and guides for our staff.

Generative AI tools have age limits, usually 13+, 16+, or 18+. If your child is old enough to use these tools but under 18, we will need your permission. Our staff know not to share your child's important work with AI tools that don't protect their data. We are also working towards teaching students about AI to prepare them for the future and introducing carefully selected AI educational resources into lessons.

When our staff use Generative AI, they do not share personal information like names or birthdays. They use AI to help create lesson plans, classroom resources, provide feedback and produce reports without sharing personal data. If we use any personal data with other AI resources, it is done safely with tools with data protection features and staff follow all our data protection rules.

## Appendix C – Example Staff Responsible Use

| Item | Responsible Use Case | Guidance |
|---|---|---|
| Transforming students work | Convert a short (1-2 sentences) of a student's writing to an image that represents the fictional story. | Teacher inputs the extract into Generative AI, turns off the data projector, quality assures the image, then shared with the student. |
| Lesson planning and resource creation | Generate lesson plan, slides and resources. | Engage with Copilot to draft then refine the lesson plan via AI and own editing. Quality assure the lesson plan.<br><br>Create slides in Canva via an education license and quality assure the slides/resources. |
| Documentation | Summarise research or a report. | Attach the report to Copilot and ask it to summarise the research/report. Quality assure the outcomes by cross-referencing key elements with the original research/report. |
| Management Information | Generate letters and emails using Ask Arbor with the Arbor Management Information System (MIS). | Arbor is a secure data environment and is GDPR compliant. The data does not train the underlying AI model. A DPIA has been undertaken. |

## Appendix D – Example Student Responsible Use

| Item | Responsible Use Case | Guidance |
|---|---|---|
| Personalised Learning | To learn through adaptive approaches. | Use commercial products commissioned by the school following a DPIA. |