



Artificial Intelligence (AI) Use Policy

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Contents

1. <i>Introduction</i>	3
2. <i>Scope</i>	4
3. <i>Principles</i>	4
4. <i>Review</i>	7
5. <i>National Guidance</i>	7
6. <i>Trust Acceptable Use Guidance and Resources</i>	8
7. <i>Information for Parents and Carers</i>	8
<i>Appendix A – Example Staff Responsible Use</i>	10
<i>Appendix B – Example Student Responsible Use</i>	10

1. Introduction

- 1.1 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.
- 1.2 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.
- 1.3 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 with compromising quality but supported by AI are the more effective.
- 1.4 This Artificial Intelligence (AI) Use Policy should be read and considered alongside other school and trust policies and guidance, including:
 - Code of Conduct
 - Data Protection Policy
 - Data Breach Notification Policy
 - Data and E-Security Breach Prevention Policy
 - Disciplinary Policy & Procedure
 - E-Safety Policy
 - ICT Acceptable Use Policy
 - Cyber Response Policy
 - Safeguarding Policy
 - Other policies introduced relevant to AI.
- 1.5 In addition, the Trust has published Acceptable Use Guidance which should be considered alongside this Policy. Exceed Academies Trust staff can access AI-specific guidance and resources via SharePoint and the Trust website: www.exceedacademiestrust.co.uk/ai
- 1.6 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.

2. Scope

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

3. Principles

- 3.1 Any use of AI must follow the Trust's vision and values, strategic plan or the Trust's collective consistencies.
- 3.2 Whether directly, or indirectly, the overarching goal of AI is to assist students in achieving educational goals and improve outcomes. This may be through workload reduction or teacher time saving techniques for example, or through Trust agreed third party software.
- 3.3 The Trust is committed to the ethical use of Artificial Intelligence (AI) to enhance learning and administrative processes. The Trust and schools must prioritise transparency, fairness, and accountability in all AI applications. AI tools will be used to support educational goals while respecting the privacy and rights of all students and staff. We must ensure that AI systems are designed and implemented to avoid bias, promote inclusivity, and uphold the highest standards of integrity and responsibility.
- 3.4 AI must never replace human judgment; it should enhance knowledge and decision making. Equally, the loss of human interaction is a risk that should be mitigated in an organisation, profession and sector that is built on human relationships.
- 3.5 Exceed Academies 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. The Department for Education and Chartered College of Teaching provided accredited AI training for school staff: Modules 1 to 4 - <https://www.gov.uk/government/collections/using-ai-in-education-settings-support-materials>; and certificated assessment - <https://chartered.college/safe-and-effective-use-of-ai-in-education/>
- 3.6 ***Personal or identifying information must never be entered into any AI system without prior approval from the Data Protection Officer (DPO) and completion of a Data Protection Impact Assessment (DPIA). The DPIA ensures robust data and cyber security and involves checks on providers, sign-in processes, infrastructure, and trial arrangements. Following a DPIA, Microsoft 365 Copilot Chat and Microsoft 365 Copilot Premium are the only approved general use Large Language Model (LLM) for Exceed Academies Trust staff to use for work-related purposes. Microsoft 365 Copilot Chat or Copilot Premium must be linked exclusively to school/trust-issued Microsoft 365 account as this provides enterprise grade data protection. Other Large Language Models - including ChatGPT, Gemini and Claude - must not be used unless there are exceptional circumstances approved in writing by the Trust DPO following a DPIA. There are other AI services with integrated LLM type features - such as Canva - that may also be authorised for staff use, but personal or sensitive data must never be used with***

these services. The Trust will maintain a list of Approved AI Services; this is available upon request. Misuse will be addressed under Data Protection and HR policies, including disciplinary procedures:

- 3.7 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 agreement with the DPO, a Data Protection Impact Assessment (DPIA) must be carried out to ensure that appropriate levels of data and cyber security are present to protect personal information. A DPIA includes liaising with other Trust colleagues to undertake due diligence on the company providing the service (Finance); how users sign-in to the resource and wider infrastructure considerations (Estates and IT); and how the resource will be trialled before it is purchased (School Improvement).
- 3.8 The Trust authorises Microsoft 365 Copilot Chat and the upgraded service Microsoft 365 Copilot Premium as the Trust's only approved general use large language model (LLM). This service must only be associated with school/trust issued Microsoft 365 accounts. These services provide enterprise grade data protection to support the safe handling of sensitive and personal trust and school data and information.
- 3.9 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 large language models outside of the school/trust provided Microsoft 365 environment. This includes ChatGPT, Gemini and Claude.
- 3.10 Incidents of inappropriate use of Generative Artificial Intelligence, including the use of personal and/or sensitive data, 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.
- 3.11 Subject to Trust approval following a Data Protection Impact Assessment (DPIA), other AI-enabled services that incorporate LLM type features or other AI functionality may be approved for use for specified purposes or projects. In all such circumstances, personal and sensitive data and information must not be used with these AI service. This is to ensure appropriate data-protection and information-governance controls are in place. The Trust will maintain a list of AI Approved Services.
- 3.12 Other LLMs may be approved in exceptional circumstances following a briefing meeting with the DPO and a DPIA. Consent, if given, will be provided in writing. In all such circumstances, personal and sensitive data and information must not be used with the AI service.
- 3.13 Generative AI services 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 regardless of whether the AI service is approved by the Trust.
- 3.14 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 must not be used to train Generative AI.

- 3.15 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.
- 3.16 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.
- 3.17 User age restrictions vary between models and must be adhered to. Most are age 18+, some 16+ or 13+.
- 3.18 Written parental consent is required for students aged over the minimum age restriction for the AI service but under 18 years of age to use AI services in schools. The use of Large Language Models (LLM) by students is not permitted at this time. Exceed Academies Trust primarily sees LLM and services with LLM type features as a tool for staff. Appendix A provides some example staff uses with guidance.
- 3.19 Staff should report any misuse of AI to the ICT Support Team/Headteacher. Students should report misuse to their teacher.
- 3.20 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.
- 3.21 If an external individual wishes to raise a complaint about the use of AI, this would need to be raised in line with the Exceed Academies Trust Complaints Policy & Procedure.
- 3.22 Regular updates will be communicated to staff and students when applicable, acknowledging that AI is a developing technology.
- 3.23 Staff and students should have sufficient knowledge and guidance to ensure that they can recognise where AI is useful, and when AI is counterproductive.
- 3.24 Before AI enabled tools and resources are used by pupils and students, typically via commercial purchased teaching and learning resources, a Data Protection Impact Assessment must be completed. Parental consent should be secured before pupils and students begin to use such tools in a trial or beyond.
- 3.25 Apple Intelligence is only permitted for staff use on a work-issued mobile device or tablet using an Apple ID associated with your work Microsoft 365 email address. Apple Intelligence does not share data beyond the device or Apple's Private Cloud Commute (PCC) with end-to-end encryption. This data is not stored or used to train the underlying AI model. Apple Intelligence can use a bespoke version of ChatGPT to provide its service. This is permitted but users must not be signed in to ChatGPT on their device via their Apple Intelligence settings. Being signed in allows the data to move outside of the secure environment and the data can be stored by and train ChatGPT. The ChatGPT standalone app must not be installed on the device.
- 3.26 Integrated AI models on non-Apple devices must not be used, including Gemini on Android devices, on work devices or for work-related purposes.

4. Review

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

5. National Guidance

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

5.2 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:

- o what they need to do to protect students online*
- o 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>

5.3 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>

5.4 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...
Safety, security, and robustness	Assure themselves that AI solutions are secure and safe for users and protect users' data.
	Ensure they can identify and rectify bias or error.

Regulatory principle	Providers are expected to...
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.
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. 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>

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

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

5.6 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/>

6. Trust Acceptable Use Guidance and Resources

6.1 Exceed Academies Trust has created a range of guidance and resources. These are available at www.exceedacademiestrust.co.uk/ai.

7. Information for Parents and Carers

7.1 Schools must display the following statement on their website:

At Exceed Academies 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 365 Copilot Chat and Machine Learning 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 to enhance your child(ren)'s learning. We have groups of school leaders, teachers, and support staff working together

to better understand how AI can help and what we need to be careful about. We have also created an acceptable use policy, training programmes and guidance for our staff.

Generative AI models have age limits, usually 13+, 16+ or 18+. If your child is old enough to use these tools but are under 18, we will need your permission before they use them in school or as part of their learning. At this moment, we do not plan to provide children with AI models like Microsoft 365 Copilot Chat. We will make you aware if this changes.

Your child(ren) may use AI-enabled learning resources in school. Our staff know not to share your child's important work with AI tools or providers that don't protect their data. Where the provider requires it, we will undertake a data protection risk assessment and we will typically ask for your consent before using such tools. We are also working towards teaching students about AI to help them for the future in line with the government's curriculum plans.

When our staff use Generative AI, they do not share personal information like names or birthdays with models that do not have enterprise data protection within our Microsoft 365 environment. They may use AI to help them to undertake their role, including creating lesson plans, classroom resources and reports. 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 and related policies.

If you would like to learn more about AI, BBC Bitesize has resources (designed for students) available here that you may find useful: <https://www.bbc.co.uk/bitesize/groups/cgk3rj0kl55t>

Appendix A – 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. Use Aila (Oak National Academy) and quality assure the outcome. Create slides in Canva via an education license and quality assure the slides/resources.
Documentation	Summarise research or a report.	Attached 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 B – 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.
Introducing AI to students	Demonstrate that AI collects, stores and uses data inputted into it.	Use Google's Quick Draw! For students to draw items and then discuss how it uses the drawings of over 50 million entries to create 'typical' images that users draw. But no personal or sensitive data has been shared.