



Brighter Futures
Educational Trust

ARTIFICIAL INTELLIGENCE (AI) POLICY

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CONTENTS

1. Introducing our Artificial Intelligence Policy
2. Aims and Scope
3. Legislation
4. Regulatory Principles
5. Roles and Responsibilities
6. Staff and Trustee Use of AI
7. Educating Pupils about AI
8. Use of AI by Pupils
9. Authorised AI Tools
10. Formal Assessments
11. Staff Training
12. Breach of this Policy
13. Cyber Security
14. Definitions
15. Monitoring and Transparency
16. Links with other Policies

1. INTRODUCTION

Artificial Intelligence (AI) technology is already widely used in both commercial and everyday applications, and its influence is anticipated to continue to grow exponentially, impacting almost all industries and job sectors including education, particularly with the development of Generative AI. Generative AI has become a widely used tool in a short period of time that is more accessible by non-specialists. Generative AI refers to technology that can be used to create new content based on large volumes of data that models have been trained on from a variety of works and other sources. Generative AI is a rapidly evolving and increasingly freely available technology generating writing, audio, codes, images and video simulations. Whilst this offers opportunities for trusts and their pupils, it also increases risk.

AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. The primary purpose of this policy is to offer guidance and establish a responsible and consistent approach to AI across our Trust, for the following aims:

- Enhance academic outcomes and educational experiences for pupils
- Support staff in managing their workload more efficiently and effectively
- Educate staff and pupils about safe, responsible, ethical and legal use of AI
- Protect the privacy, rights and data of all stakeholders
- Incorporate AI as a teaching and learning tool to develop staff and pupils' AI literacy and skills
- Prepare staff and pupils for a future in which AI technology will be an integral part
- Promote equity in education
- Improve and streamline Trust operations to minimise cost and maximise efficiency.

The purpose of this policy is to ensure users are aware of the controls and methods that Brighter Futures Educational Trust has put in place to manage the use of AI. Users are expected to comply with the policy to ensure that AI tools are used appropriately.

We recognise that the technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. We recognise the leadership in the education sector provided by the Department of Education and the guidance set out in their [Statement on Generative Artificial Intelligence in Education](#). This AI policy has been informed by that guidance

We will be transparent and accountable about the use of AI technology so that stakeholders, including staff, pupils, parents and other partners understand where and how AI is used and

who is responsible. Any stakeholder feedback or questions about the use of AI will be considered and responded to appropriately.

By adhering to this policy, we aim to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all involved.

2. AIMS AND SCOPE

Here at Brighter Futures Educational Trust (BFET) we understand 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, Trustees and pupils. This includes generative chatbots such as ChatGPT and Google Bard (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, Trustees and pupils
- Protect the privacy and personal data of staff, Trustees 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

3. 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 also 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 \(DPA 2018\)](#)

4. REGULATORY PRINCIPLES

We follow the 5 principles set out in the [AI regulation white paper](#).

REGULATORY PRINCIPLE	WE WILL ...
Safety, security and robustness	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	<ul style="list-style-type: none"> • 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

REGULATORY PRINCIPLE	WE WILL ...
Accountability and governance	<ul style="list-style-type: none"> • Ensure that the governing board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	<ul style="list-style-type: none"> • 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

5. ROLES AND RESPONSIBILITIES

5.1 Governing board

The governing board will:

- Take overall responsibility for monitoring this policy and holding the Executive Headteacher (EHT) to account for its implementation in line with the Trust's AI strategy
- Ensure the EHT is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school
- Adhere to the guidelines below to protect data when using generative AI tools:
 - Use only approved AI tools (see section 5)
 - Seek advice from the Data Protection Officer / Managed Service Provider (MSP)
 - 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

5.2 Executive Headteacher

The EHT will:

- Take responsibility for the day-to-day leadership and management of AI use in the Trust.
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation

- Ensure that the guidance set out in this policy is followed by all staff
- Review and update this AI policy as appropriate, and at least annually
- 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 and data protection impact assessments

5.3 Data protection officer (DPO)

The 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 Carole Connelly/Patrick Aikman of Schools DPO Service and is contactable via www.schoolsdposervice.com or carole@schoolDPOservice.com or patrick@schoolDPOservice.com or 07805 382374

5.4 Safeguarding lead

The safeguarding lead is 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)

5.5 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 9)
- Seek advice from the Data Protection Officer or MSP for IT as appropriate
- 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 of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

5.6 Pupils

Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

6. STAFF, MEMBERS, TRUSTEES, MEMBERS & GOVERNORS USE OF AI

6.1 Approved use of AI

We are committed to helping staff and Trustees 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 Trustees using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or Trustees 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 school or Trust has approved its use doesn't mean it will always be appropriate.

6.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the EHT to discuss any ideas they may have with regards to using AI, so the EHT can take the suggestions forward if they deem it to be a satisfactory new method of working.

The EHT is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO and data protection impact assessments.

6.3 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, BFET 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.

6.4 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.

6.5 Bias

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

We will ensure we can identify and rectify bias or error by training staff in this area.

We 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 as a consequence of AI use, these will be dealt with through our usual complaints procedure.

6.6 Raising concerns

We encourage staff and Trustees to speak to the EHT in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

6.7 Ethical and responsible use

We 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 trustees 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.

7. EDUCATING PUPILS ABOUT AI

At BFET we acknowledge that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society.

Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI.

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

8. USE OF AI BY PUPILS

We recognise 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.

Secondary schools

We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures as set out in our Exam Contingency Plan.

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 explicit or offensive content

Input offensive, discriminatory or inappropriate content as a prompt

9. AUTHORISED AI TOOLS

9.1

The following is a list of authorised AI tools for BFET. The trust allow access to the following AI tools for business purposes and a Data Protection Impact Assessment has been completed for each of these:

- MIS AI function
- Microsoft 365 Copilot
- AI notetaker apps
- Specific Education focussed AI tools
- HR compliance AI tools

9.2

The listed AI tools may be updated at any time. Should staff wish to use another AI tool not listed, they must contact the EHT to review permission to do so.

Authorised AI tools must only be used by staff for the following business purposes:

- Drafting internal guidance, training and presentations
- Lesson planning
- Conducting research
- Developing code
- Providing summaries
- Idea generation
- Note Taking

9.3

All other purposes must be authorised in advance by the Head of school. Before using any AI tools, staff will be provided training to ensure human reviewers (those who conduct monitoring of these applications) have a correct understanding and do not add any bias into the AI systems/functions.

10. ACCESS TO CCTV FOOTAGE

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our exams / assessment policy for more details.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on [AI use in assessments](#).

11. STAFF TRAINING

11.1 Staff Development and AI Integration

Our Trust is committed to ensuring that all staff maintain a strong understanding of artificial intelligence (AI) and its evolving role in education. To support this, we implement a structured approach to AI professional development, ensuring staff have ongoing opportunities to enhance their practice.

11.2. Ensuring AI Understanding

To develop a comprehensive understanding of AI, staff will be provided with:

- Regular training sessions covering AI fundamentals, ethical considerations, and practical applications in education.
- Access to curated resources, including research articles, case studies, and AI-powered educational tools.
- A collaborative environment where educators can exchange insights and discuss AI developments.

11.3. Professional Development and Responsibilities

To ensure continued access to CPD opportunities in AI:

- The Senior Leadership Team (SLT) or a designated AI coordinator will oversee AI training initiatives.
- External experts and partnerships with educational institutions will be leveraged to deliver high-quality workshops.
- An AI-focused CPD strategy will be embedded into the school's annual training calendar.

11.4. Staying Abreast of Good Practice

To keep up with advancements in AI:

- The Trust will engage with leading educational bodies and AI research groups to stay informed.
- AI best practices and updates will be shared through staff meetings, newsletters, and Behaviour Watch.
- A feedback mechanism will be introduced, allowing staff to reflect on AI integration and suggest areas for improvement.

12. BREACH OF THIS POLICY

12.1 By Staff

Breach of this policy by staff will be dealt with in line with our 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 us with access to:

- The generative AI application in question (whether or not it is one authorised by the school)
- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the headteacher immediately.

12.2 By Trustees

Trustees found in breach of this policy by staff will be dealt with in line with our governance code of conduct and dealt with by the Members.

12.3 By Pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy.

13. CYBER SECURITY

13.1

Our Trust will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to our MSP and the DPO.
- Carrying out an evaluation of the security of any AI tool before authorising it for use. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.

- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

14. DEFINITIONS

- **Algorithm** is a rule given to an AI machine to perform a task.
- **Artificial Intelligence (AI)** is an umbrella term for a range of algorithm-based technologies and approaches that often attempt to mimic human thought to solve complex tasks, these may include, visual perception, speech recognition, decision making, and translation between languages.
- **Centre of Excellence** is a group with a shared area of focus and subject matter expertise that they use to support others, usually by providing tips, insights, training and research.
- **ChatGPT** is owned by OpenAI LP, an artificial intelligence research lab. GPT stands for 'Generative Pre-trained Transformer'. It means that the model has the ability to generate text or other forms of output.
- **Generative AI** is a form of AI, which produces new content, such as images, text or computer code. It works by using large quantities of data, often harvested from the internet, to train a model in the underlying patterns and structures of that data. After many rounds of training the model is capable of generating new content. When a user provides a prompt or input, the AI evaluates the likelihood of various possible responses based on what it has learned from its training data. It then selects and presents the response that has the highest probability of being the right fit for the given prompt. That prompt and response then may be fed back into the model to provide further training.
- **Guardrails** are restrictions and rules placed on AI systems to ensure they handle data properly and ethically.
- **Hallucination** is when AI presents information as fact when it is not actual fact.
- **Large Language Model (LLM)** is a huge database of language knowledge that can write articles, answer questions or create realistic dialogue and is pre-trained on large amounts of data.
- **Natural Language Processing (NLP)** understands written and spoken language e.g. translations.

15. 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 Executive

Leadership Team. whenever there is a significant change to either AI use by the school 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 full governing board at least annually.

All staff are expected to read and follow this policy.

We will ensure we keep members of the trust 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 in school.

15. LINKS WITH OTHER POLICIES

This AI policy is linked to our:

- Data Protection Policy
- Assessment Policy
- Exams Contingency Plan
- Behaviour Policy
- Staff Code of Conduct
- ICT Acceptable Use Policy
- Online Safety Policy
- Equality and Accessibility Policy
- Cyber Security Policy