Artificial Intelligence (AI) Policy

RESPONSIBLE DIRECTOR
Chief Executive Officer

RATIFIED BY TRUST
December 2025

REVIEW DATE
December 2026

1. Aims, scope & definition

The aim of this policy is to establish guidelines for the ethical, secure, and responsible use of AI technologies across our Trust. This is a rapidly emerging area and advice, and guidance will quickly be superseded by new tool capability and technical advances. Consequently, this policy will be subject to at least annual review.

Knowledge Schools Trust appreciate the valuable potential that artificial intelligence (AI), including generative AI, holds for schools in areas such as enhancing pedagogical methods, supporting the development of curriculum resources, and helping support innovation both in the classroom and in our support functions and governance processes.

There are also clear risks posed by AI, including potential data protection conflicts and breaches, copyright issues, ethical concerns, and challenges to safeguarding compliance obligations.

The policy covers the use of AI tools by all employees (whether fulltime, parttime or fixed contract and agency staff) as well as providing advice to Trust Directors and school governors. It does not explicitly cover the use of AI by pupils other than giving some general common-sense guidelines. More detailed pupil advice and requirements can be found in the relevant policies (namely, for our Secondaries the
'Pupil ICT and Social Media Acceptable Use Policy' and for our Primaries the 'Electronic Device Policy and the Online Safety Policy').

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, directors, 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 sourced ethically and responsibly by all staff, directors, governors, and pupils
- Protect the privacy and personal data of staff, directors, governors, and pupils in compliance with the UK GDPR Data Protection laws and other legislation that is applicable.

Definitions

In this policy, 'artificial intelligence' (AI) means digital systems and tools that use data and automated rules to perform tasks that usually require human judgement or effort, such as generating text or images, giving feedback, making suggestions, or recognising patterns (for example in spelling, grammar, marking, translation, search, planning or recommendations). This includes both standalone AI tools and AI features built into common software and online services.

This policy refers to both 'open' and 'closed' generative AI tools. These are defined as follows:

Open generative AI tools are accessible and for use by anyone on the wider internet. They may store, share, or learn from the information entered, including personal or sensitive information. Examples would be ChatGPT, Claude, Gemini and similar.

Closed generative AI tools that are managed within the boundaries of the Trust's IT tenancies. These are more secure, as KST restrict 3rd party access so external parties cannot access data input. An example would be Microsoft CoPilot which is offered as part of our Microsoft subscription.

2. Government guidance and legislation

This policy reflects good practice guidelines/recommendations recently published:

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)

Data Use and Access Act 2025 (DUAA).

3. Regulatory principles

The policy incorporates the five principles set out in the AI regulation white paper

and also reflect Ofsted's expectations of what schools must demonstrate.

Regulatory principle	Implications and OFSTED's expectations of schools
Safety, security, and robustness	Ensure that AI solutions are secure and safe for users and protect users' data. Ensure we can identify and rectify bias or errors. Anticipate threats such as hacking/ cybercrime.

Regulatory principle	Implications and OFSTED's expectations of schools
Appropriate transparency and explainability	Be transparent about the use of AI and consider and review any suggestions or outcomes from its use.
Fairness	Use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, fully consider any bias relating to small groups and protected characteristics before using AI, make sure to monitor bias closely and any correct issues occurring.
Accountability and governance	Establish clear roles and responsibilities in relation to the governance, monitoring, evaluation, maintenance, and use of AI.
Contestability and redress	Encourage staff to be confident and 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.

4. Roles and responsibilities

4.1 Trust board

The Trust board will:

- Take overall responsibility for monitoring this policy and holding the Chief Executive and Headteachers to account for its implementation. Responsibility for monitoring this policy may be delegated to the Audit and Risk Committee.
- Ensure that the Executive team and Headteachers make informed decisions regarding the effective and ethical use of AI.
- Seek assurance that Trust and personal data is appropriately managed and protected when using generative AI tools and that these tools are approved

for these uses.

4.2 Headteacher

The headteacher will:

- Ensure that a member of SLT will take responsibility for the day-to-day management of AI use in the school
- Ensure that consideration is given to the implications of safeguarding and the requirements of KCSIE as part of any risk assessment of the use of AI in the school. Training will be provided training to staff on the safeguarding risks posed by AI; for pupils this training will be covered in the relevant lessons
- Ensure that the use of AI is in accordance with data protection legislation, including that we have the necessary permissions if using staff, parent, or pupil data. Advice can be taken from the data protection officer
- Ensure that the guidance set out in this policy is followed by staff
- Provide feedback on the use and need for amendment of the AI policy as part of the annual review process
- 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, considering advice from the DPO, the Trust's list of approved generative AI tools, and any data protection impact assessments required.

4.3 Executive MAT team

The Executive team will take responsibility for the overall application of the AI policy, reviewing its effectiveness, reporting back to the Board, and leading on the regular review of the policy. The team will work with Headteachers to ensure that appropriate risk assessments have been completed when required.

The Executive team will take advice from the DfE, our Headteachers, the Trust's IT suppliers and the insights of the Operations team on the list of approved generative AI tools to be used. These are set out in section 5. Approved AI Tools.

Furthermore, the Executive MAT team will:

- Guide the development and implementation of our AI Principles, AI-related policies, and practices.
- Ensure AI technologies are used in a manner that aligns with the Trust's values, policies, and legal requirements.
- Work with Headteachers to promote awareness and understanding

of AI technologies among staff, pupils, and the wider school community.

- Monitor and evaluate the impact of AI technologies on teaching, learning, and administrative processes.

Report to the Audit and Risk Committee on the development and associated risk management of AI usage.

The Audit and Risk Committee will review and approve:

- AI governance principles and policies.
- Advise on AI-related risk management and compliance matters, including reviewing incidents relating to AI
- New AI use proposals, advising on what steps need to be taken to risk assess and then supporting with the implementation of those proposals. Educational aspects of any changes will also need to be approved by Headteachers and presented the ECO committees to ensure alignment with ethos and pedagogy.

4.4 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 Craig Nightingale and is contactable via C.Nightingale@ks-t.org.

4.5 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 using approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect Trust and school data when using generative AI tools, staff must:

- Use only approved AI tools as agreed by their Headteacher or the Trust (see section 5)
- Seek advice from their Headteacher or Data Protection Officer before use of a new AI application or in case of uncertainty about whether a use is appropriate or no
- Only use approved closed generative AI applications when working with KST, staff or pupil data
- Ensure that no KST, staff or pupil data is used or shared with any open AI tools
- Acknowledge or reference the use of generative AI in their work

- Fact-check results to make sure the information is accurate
- Be aware that AI may not be relied upon as regards equality considerations.

4.6 Pupils

The advice to pupils will be set out in the relevant Trust wide policies namely, for our Secondaries the 'Pupil ICT and Social Media Acceptable Use Policy and for our Primaries the Electronic Device Policy and the Online Safety Policy.

Pupil use of AI, especially in KS3-5, will be guided in part by the advice from the Joint Council for Qualifications (www.jcq.org.uk).

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. All our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

Pupil Safeguarding

The Trust is aware of the risks posed by AI on the safeguarding of our pupils. These include:

Key safeguarding risks associated with AI include pupils being exposed to inappropriate, harmful, or illegal content (including sexual, violent, or extremist material), as well as the use of AI tools to generate abusive, bullying, or sexualised text, images or deepfakes of other children or staff, which can cause significant distress and reputational harm.

AI systems can also be used to contact, groom, or exploit children, or to obtain and misuse personal or sensitive data, for example by encouraging pupils to share information that could put them at risk online or offline.

In addition, many AI tools have minimum age restrictions and limited safety controls, so unsupervised or unauthorised use may breach legal duties around child protection, online safety, and data protection, and can undermine existing filtering, monitoring, and reporting arrangements in school.

We will mitigate these risks by:

- Taking a whole-school, proactive approach to AI use. This includes carrying out risk assessments and Data Protection Impact Assessments before adopting AI tools
- Ensuring robust filtering, monitoring, and reporting systems remain in place and cover AI-generated content; and only using age-appropriate, safety-by-design tools that meet data protection and online safety requirements
- Ensuring that staff, pupils, and parents should receive regular education on AI risks and safe use, and pupils must be explicitly taught not to create, share, or request abusive or sexualised AI content and how to report it if

they see it.

5. Approved Tools for use of AI

AI applications can help reduce the workload of staff, directors and governors. Generative AI tools can make 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 curriculum materials, plans, policies or documents, the quality and content of the final output remains the professional responsibility of the person who produced it.

Any curriculum material, revision aids, plans, policies, or documents created using AI should be clearly attributed. Any member of staff or governor circulating AI-generated material should only share the content if they are confident of the accuracy and validity of the information. Attention should also be paid to ensuring that copyrighted materials are not included.

All AI tools that are adopted within the Trust will be subject to a Data Protection Impact Assessment prior to use.

List of approved closed/ in-house AI applications (where KST data can be shared/ entered for use)
CoPilot (Microsoft) via KST/ school tenancy & software
Arbor
Satchel One
List of example open/ external AI applications include: (where KST, staff, pupil data MUST NOT be shared/ entered for use)
TheKeyGPT
ChatGPT
Gemini 2.5
Perplexity
Claude 4.0 Sonnet
Google AI assisted searches
This list contains common AI tools and is not exhaustive. If in doubt, please send a query to our DPO at C.Nightingale@ks-t.org.

5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should first contact their headteacher to discuss any ideas they may have with regards to using AI, so the headteacher can make a review and take forward any proposals deemed to be an appropriate new method of working.

The headteacher is responsible for signing off on approved uses of AI, including new AI tools, considering advice from the MAT Exec Team, the DPO, our external IT providers and data protection impact assessments. Any newly approved applications/ tools will be added to the updated policy on an annual basis. Any use by the Central MAT team will be approved by the CEO.

5.3 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised/ open generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, the Trust will treat this as a data breach and possibly a case of misconduct. Any data breaches must be reported to the Data Protection Officer. Breaches may also trigger an investigation under KST's disciplinary policy.

5.4 Intellectual property (IP)

Most generative AI tools use inputs submitted by users to train and refine their models.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

The IP for curriculum and teaching materials created by staff are owned by KST (as is made clear in our employment contracts). Such material must not be shared with open AI models or tools.

Pupils own the intellectual property (IP) rights to the original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions and will include artistic creations.

Pupils' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race, and disability. This means that thought must be applied to all outputs of authorised AI applications. This means fact and

sense-checking the output before relying on it.

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 because of AI use, these will be dealt with through our usual complaints procedure.

5.6 Raising concerns

We encourage staff and governors to speak to their line manager or Headteacher 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. The MAT Central Team will incorporate review concerns raised and make any necessary amendments in the next version of the policy alongside updating guidance accordingly.

5.7 Ethical and responsible use

We will:

- Always use generative AI tools ethically and responsibly
- Always 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
- Always fact and sense-check the output before relying on it
- Never allow the generation content to impersonate, bully or harass another person, nor allow the generation of explicit or offensive content
- Never allow the use of AI to generate offensive, discriminatory, or inappropriate content.

8. AI use in formal assessments

As with other types of cheating and misrepresentation the Trust will continue to take reasonable steps to prevent malpractice involving the use of generative AI in assessments. In particular we will be guided by the DfE and the Joint Council for Qualifications (JCQ) on AI use in assessments.

The 2025 JCQ guidance states that:

- Teachers and assessors must only accept work for qualification assessments which is the students' own

- Students who misuse AI to the extent that the work they submit for assessment is not their own will have committed malpractice in accordance with JCQ regulations and could attract severe sanctions
- Students and centre staff must be aware of the risks of using AI and must be clear on what constitutes malpractice
- Students must ensure work submitted for assessment is demonstrably their own. If any sections of their work are reproduced directly from AI-generated responses, those elements must be identified by the student, and they must understand this will not allow them to demonstrate they have independently met the marking criteria and therefore will not be rewarded
- Where teachers have doubts about the authenticity of student work submitted for assessment (for example, they suspect that parts of it have been generated by AI, but this has not been acknowledged), they must investigate and take appropriate action.

9. Staff training

The Trust will work with Headteachers to make available training briefings covering the use of AI and the implications of this policy. Staff will be trained at one of the INSET days during the school year.

Briefings will also be provided to Trust Directors and Governors.

10. Breach of this policy

Breach of this policy by staff will be dealt with in line with our Staff Code of Conduct and the Disciplinary Policy.

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 it is one authorised or not)
- Any relevant passwords or login details.

You must report any breach of this policy, either by you or by another member of staff, to your line manager or Headteacher immediately. Reports may also be made to the DPO.

Trust Directors and Governors are expected to operate in-line with this policy and

not to share Trust, school, pupil or personal data with any unauthorised AI application or tool.

Any breach of this policy by a pupil will be dealt with in line with the school's behaviour
policy.

11. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy will require regular review and amendment. The MAT Executive Team will formally review the policy at least annually and will seek input from the Board, LGBs and Headteachers on its efficacy. The policy will be monitored and signed off by the chair of the Audit and Risk Committee.

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Assessment policy
- Exams policy
- Homework policy
- Behaviour policy
- Staff code of conduct
- Marking and feedback policy
- ICT acceptable use policy
- Online safety policy
- Equality policy.

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