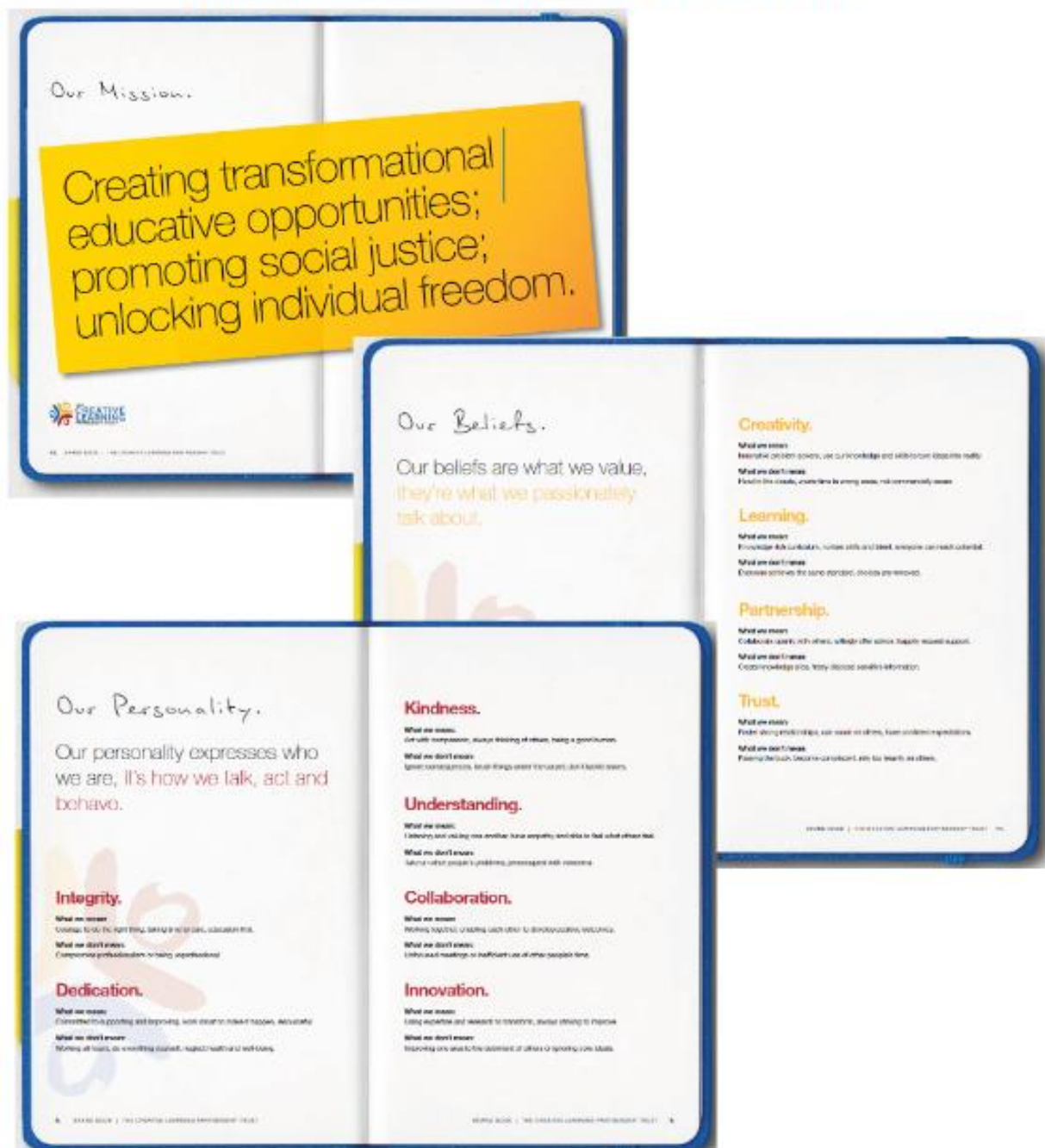




Artificial Intelligence (AI) Policy

Responsible Committee	CLPT Finance & Operations Committee
Date Approved by Committee	Spring Term 2026
Implementation Date	Spring Term 2026
Next Review Date	Spring Term 2027
Policy Owner	Laura Austen

This Policy has been created in accordance and to support the Mission, Values and Beliefs of The Creative Learning Partnership Trust.



Artificial Intelligence (AI) Policy

1. Purpose

The purpose of this policy is to outline the guidelines and procedures for the ethical, safe, and effective use of Artificial Intelligence (AI) tools within The Creative Learning Partnership Trust.

This policy aims to ensure that AI is utilised to:

- Enhance teaching and learning outcomes
- Reduce staff workload
- Support pupils with diverse needs
- Improve administrative efficiency

While prioritising:

- Safeguarding and pupil wellbeing
 - Data privacy and security
 - Equality and inclusivity
 - Academic integrity
 - Transparency and accountability
-

2. Scope

This policy applies to all staff, pupils, governors, trustees, volunteers, and visitors who use AI tools provided or approved by the trust, both on and off the premises.

It covers all forms of AI technology that support:

- Learning and teaching
- Assessment and feedback
- Pupil wellbeing and pastoral care
- Administration and governance
- Communication with stakeholders

Users must adhere to this policy whenever they engage with AI tools provided or approved by the trust.

3. Legal and Statutory Framework

This policy will have consideration for, and be compliant with, the following legislation, statutory guidance, and trust policies:

Legislation:

- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Equality Act 2010
- Education Act 2002
- Children Act 2004
- Copyright, Designs and Patents Act 1988

Statutory Guidance:

- Keeping Children Safe in Education (KCSIE) 2025
- DfE guidance on the use of technology in education
- DfE policy on generative AI in education
- Working Together to Safeguard Children

- Special Educational Needs and Disability Code of Practice

Exam and Assessment Regulations:

- Joint Council for Qualifications (JCQ) regulations on AI use in examinations and assessments
- Relevant exam board specifications and guidance

Trust Policies:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Data Protection Policy
- Online Safety Policy
- Acceptable Use Policy (staff and pupils)
- Assessment Policy
- SEND Policy
- Equality and Diversity Policy
- Staff Code of Conduct
- Curriculum Policy

This policy will be reviewed and updated in response to new and evolving guidance around the use of AI tools in education.

4. Definitions

4.1 Artificial Intelligence (AI): An umbrella term for a range of technologies and approaches that often attempt to mimic human thought to solve complex tasks.

4.2 Generative AI: AI that can create original content – such as text, images, video, audio, code – in response to a user's prompt or request. Examples include ChatGPT, Microsoft Copilot, Google Gemini, and DALL-E.

4.3 Machine Learning: A subset of AI where systems learn from data to improve their performance over time without being explicitly programmed.

4.4 Personal Data: Any information relating to an identified or identifiable individual, as defined by GDPR.

4.5 AI-assisted work: Work that has been created with the support of AI tools, where the user has provided prompts, edited outputs, or used AI for research or idea generation.

5. Roles and Responsibilities

Team/Individual	Responsibilities	Named Individuals
Leadership Team	• Oversee the implementation of AI tools and ensure alignment with the trust's educational objectives • Ensure that staff receive appropriate training in the ethical and effective use of AI tools • Ensure that pupils are safeguarded adequately, including protection from potentially harmful and inappropriate AI-	Laura Austen & Connor Millington

Team/Individual	Responsibilities	Named Individuals
	generated content • Monitor the impact of AI tools on teaching, learning, and workload • Identify, assess, and report risks associated with AI tools via the trust risk register • Ensure compliance with this policy and related legislation • Lead on stakeholder communication regarding AI use	
Trust Board	• Approve and monitor this policy, ensuring it reflects the values and ethos of the trust • Ensure the policy is easy to understand and takes into account stakeholder feedback • Monitor policy implementation and compliance • Ensure risks associated with AI are documented in the risk register and controlled appropriately • Receive regular reports on AI usage, impact, and incidents • Ensure adequate resources are allocated for AI implementation, training, and monitoring	Trust Board
Headteachers	• Ensure staff and pupils in their school understand and comply with this policy • Integrate AI considerations into curriculum planning and assessment design • Monitor the use of AI tools within their school • Address incidents of AI misuse in accordance with the behaviour policy • Communicate with parents about AI use in their school • Ensure reasonable adjustments are made for pupils with SEND	Headteachers
Teachers	• Use AI tools ethically and in accordance with this policy	All teaching staff

Team/Individual	Responsibilities	Named Individuals
	• Integrate AI tools into teaching practice to enhance learning experiences where appropriate • Model appropriate AI use to pupils • Regularly assess the effectiveness of AI tools in supporting pupil progress • Ensure pupils understand when and how AI can be used appropriately • Monitor pupil use of AI and address misuse in accordance with the behaviour policy • Maintain academic integrity and comply with exam board regulations • Report any safeguarding concerns arising from AI use	
IT Leader/Department	• Manage the technical aspects of AI implementation, including procurement, deployment, and maintenance • Ensure robust data security measures are in place for all AI tools • Conduct technical due diligence on AI tools before approval • Monitor system performance and address technical issues • Maintain an inventory of approved AI tools • Support staff and pupils with technical aspects of AI use • Strengthen cyber security measures in response to AI-related threats	Laura Austen & Connor Millington
Data Protection Officer (DPO)	• Ensure that the development and use of AI tools complies with GDPR and data protection legislation • Conduct Data Protection Impact Assessments (DPIAs) for all AI tools • Monitor AI usage to ensure data protection compliance • Advise on data sharing agreements with third-party AI providers • Ensure appropriate privacy notices are in place • Handle data subject access requests	Laura Austen

Team/Individual	Responsibilities	Named Individuals
	related to AI use • Maintain records of processing activities involving AI	
Designated Safeguarding Lead (DSL)	• Ensure AI tools do not pose safeguarding risks to pupils • Monitor for harmful or inappropriate AI-generated content • Address safeguarding concerns arising from AI use • Ensure staff understand how to report safeguarding concerns related to AI • Liaise with external agencies where necessary • Include AI considerations in safeguarding training	DSL in each school
SENCO	• Ensure AI tools are accessible to pupils with SEND • Identify opportunities for AI to support pupils with additional needs • Monitor the impact of AI on SEND pupils • Advise on reasonable adjustments related to AI use • Ensure AI tools do not disadvantage pupils with SEND	SENCO in each school
All Staff	• Use AI tools in accordance with this policy and the staff code of conduct • Complete required training on AI use • Report any concerns about AI misuse or safeguarding issues • Maintain confidentiality and data protection when using AI tools • Model ethical AI use to pupils	All staff
Pupils	• Use AI tools responsibly and in accordance with this policy • Be transparent about when and how they use AI in their work • Not use AI to plagiarise or cheat • Report any concerns about AI-generated content	All pupils

Team/Individual	Responsibilities	Named Individuals
	• Respect copyright and intellectual property	
Parents/Carers	• Support the trust's approach to AI use • Discuss appropriate AI use with their children • Raise any concerns with the school • Encourage their children to use AI ethically and responsibly	All parents/carers
External Parties (Suppliers/Providers)	• Provide independent expert advice on AI systems where contracted to do so • Provide evidence and assurance that third-party AI systems are safe, GDPR-compliant, and effective • Alert the trust to any changes to their own policies, terms of service, or data processing practices • Comply with data sharing agreements and contracts • Respond promptly to data protection or security incidents	Entrust and other approved suppliers

6. Principles of AI Use

All use of AI within the trust must adhere to the following principles:

6.1 Transparency

- All users must be transparent about when and how they use AI
- Work that has been wholly or partially created with AI support must be clearly labelled as 'AI-assisted' or 'AI-supported'
- Pupils must declare AI use in accordance with teacher guidance and assessment requirements

6.2 Data Protection and Privacy

- Any data entered into an AI tool must not be identifiable (personal), sensitive, or confidential in nature
- Users must not input personal data about pupils, staff, or other individuals into AI tools unless the tool has been specifically approved for processing such data and a DPIA has been completed
- All AI tools must comply with GDPR and data protection legislation

6.3 Safeguarding

- AI tools must not expose pupils to harmful, inappropriate, or illegal content
- Staff must monitor AI-generated content for safeguarding concerns
- Any safeguarding concerns arising from AI use must be reported to the DSL immediately
- AI tools must be used in accordance with KCSIE 2025 and the trust's safeguarding policy

6.4 Academic Integrity

- Users must not use AI to plagiarise any work
- All content generated by AI must be properly attributed
- Users must not enter original work (including pupils' work) into AI tools without the creator's consent
- Pupils' work must not be used to train AI tools without explicit consent

6.5 Accuracy and Reliability

- Users must be aware that AI can produce plausible but incorrect information (known as 'hallucinations')
- All AI-generated content must be fact-checked and verified before use
- References and citations provided by AI tools must be verified independently
- AI should not be relied upon as the sole source of information

6.6 Equality and Inclusivity

- AI tools must be accessible to all users, including those with disabilities or SEND
- Reasonable adjustments must be made to ensure equitable access
- AI tools must not discriminate against or disadvantage any individual or group
- The trust will monitor for bias in AI outputs and take corrective action where necessary

6.7 Human Oversight

- AI tools are to support, not replace, human judgment and professional expertise
- All significant decisions must involve appropriate human oversight
- Teachers retain professional responsibility for assessment, feedback, and pupil progress
- AI-generated content must be reviewed and edited by a human before use

6.8 Copyright and Intellectual Property

- Users must respect copyright and intellectual property rights when using AI tools
- AI-generated content may be subject to copyright restrictions
- Users must not use AI to infringe upon the intellectual property rights of others

7. Approved AI Tools

7.1 Approval Process

Before any AI tool is used within the trust, it must be approved through the following process:

1. Initial Assessment by the IT Leader and DPO to evaluate:
 - Data protection compliance
 - Security measures
 - Terms of service
 - Cost and value for money
2. Data Protection Impact Assessment (DPIA) conducted by the DPO for any tool that processes personal data
3. Safeguarding Review by the DSL to assess potential risks to pupils
4. Pedagogical Evaluation by the leadership team to determine educational value
5. Final Approval by the leadership team or Trust Board (depending on cost and risk level)

7.2 Approved AI Tools Register

The IT Leader will maintain a register of approved AI tools, including:

- Tool name and provider
- Purpose and approved uses
- Data protection measures

- Date of approval and review date
- Any restrictions or conditions of use

This register will be made available to all staff and reviewed annually.

7.3 Prohibited AI Tools

Staff and pupils must not use AI tools that:

- Have not been approved by the trust
- Require payment using personal funds (unless explicitly approved)
- Process personal data without adequate safeguards
- Pose safeguarding risks
- Violate copyright or intellectual property rights
- Are prohibited by exam boards for assessed work

8. Appropriate Use of AI

8.1 How Teachers Might Use AI

Example Use	Considerations	Approval Required?
Lesson Planning Drafting lesson plans, creating learning objectives, suggesting activities	AI outputs may be factually incorrect or lack sound pedagogical foundations. Teachers must review and adapt all AI-generated lesson plans. The teacher retains professional responsibility for the quality of teaching.	Use approved tools only
Resource Creation Generating worksheets, quizzes, discussion prompts	AI can quickly generate multiple-choice quizzes and assessment ideas, but these must be reviewed carefully as AI can produce plausible but incorrect information. Ensure resources are age-appropriate and curriculum-aligned.	Use approved tools only
Differentiation Customising materials (simplifying language, adjusting reading levels, creating tailored activities)	Generally effective for adapting existing materials. Less likely to introduce factually incorrect information when modifying rather than creating new content. Must ensure accessibility for all pupils.	Use approved tools only
Feedback Drafting Generating initial feedback comments for pupil work	AI can suggest feedback, but teachers must personalise and review all comments. Teachers must not use AI to mark pupil work or make assessment judgments. The teacher retains responsibility for all feedback and assessment.	Use approved tools only

Example Use	Considerations	Approval Required?
Administrative Tasks Drafting emails, reports, letters to parents	AI can help with routine communications, but all content must be reviewed for accuracy, tone, and appropriateness. Must not include personal or sensitive data in prompts.	Use approved tools only
Professional Development Researching teaching strategies, exploring new pedagogical approaches	Useful for exploring ideas, but information must be verified through reputable sources. AI should supplement, not replace, professional learning.	Use approved tools only
Translation Translating communications for EAL families	AI translation can be helpful but may lack cultural nuance. Consider professional translation services for important communications.	Use approved tools only

Teachers must NOT use AI to:

- Make final assessment or grading decisions without human review
- Process pupils' personal data through unapproved tools
- Replace professional judgment in safeguarding matters
- Generate content for high-stakes assessments without verification
- Share confidential information about pupils, staff, or the school

8.2 How Pupils Might Use AI

Example Use	Considerations	When Permitted?
Idea Generation Brainstorming topics, creating essay structures, planning projects	AI tools are generally effective in producing outlines as a starting point. Pupils must develop and expand ideas independently. Must be declared in accordance with teacher guidance.	When explicitly permitted by the teacher and properly declared
Writing Support Proofreading, grammar checking, improving clarity	Similar to grammar tools like Grammarly. AI can provide feedback on style and content. Pupils must understand when this should be declared. Not permitted for assessed work unless specified by exam boards.	When explicitly permitted by the teacher
Research Gathering information, exploring topics, finding sources	A good understanding of AI limitations is crucial, particularly the tendency to provide misinformation. All information must be verified through reliable sources. Pupils must cite sources properly.	When explicitly permitted by the teacher and information is verified

Example Use	Considerations	When Permitted?
Language Learning Practising conversations, translating text, learning vocabulary	Can be helpful for practice, but should not replace interaction with teachers or authentic language resources.	When explicitly permitted by the teacher
Coding and Programming Debugging code, explaining programming concepts, generating code snippets	Useful for learning, but pupils must understand the code they submit. Must be declared in accordance with teacher guidance.	When explicitly permitted by the teacher and properly declared
Image Creation Generating images for presentations or creative projects	Image generation tools may come at a cost. Pupils must be aware of copyright concerns and usage rights. Must be declared and attributed.	When explicitly permitted by the teacher and properly attributed
Accessibility Support Text-to-speech, speech-to-text, reading support	AI can provide valuable support for pupils with SEND. Should be considered as a reasonable adjustment where appropriate.	When identified as appropriate by SENCO/teachers

Pupils must NOT use AI to:

- Complete assessed work without teacher permission and proper declaration
- Plagiarise or pass off AI-generated work as their own
- Submit AI-generated work for external examinations (unless permitted by exam boards)
- Share personal information about themselves or others
- Generate, share, or access inappropriate content
- Circumvent school filtering or monitoring systems
- Use AI in ways that could harm others (e.g., creating deepfakes, impersonation)

8.3 How Leaders, Governors, and Governance Professionals Might Use AI

Example Use	Considerations	Approval Required?
Policy Development Drafting policies, procedures, and guidance documents	AI can provide a useful starting point, but the quality and content of the final document remains the professional responsibility of the author and the trust. All policies must be reviewed by appropriate stakeholders and approved through governance processes.	Use approved tools only

Example Use	Considerations	Approval Required?
Communication Drafting Letters to parents, staff briefings, newsletters	AI tools can help plan and structure communications and apply a consistent style. Users must ensure content is accurate, appropriate, accessible, and suitable for all stakeholders. Must not include personal or confidential data.	Use approved tools only
Meeting Administration Drafting agendas, summarising discussions, producing minutes	AI tools can use transcripts or notes to help produce minutes efficiently. Must maintain confidentiality. Discuss format with the board. Minutes remain the responsibility of the clerk/minute-taker.	Use approved tools only
Data Analysis Analysing pupil data, identifying trends, generating reports	AI can help identify patterns in data, but human oversight is essential for interpretation and decision-making. Must comply with data protection requirements.	Use approved tools only; DPIA required
Strategic Planning Researching best practices, drafting improvement plans	AI can support research and planning, but strategic decisions must be made by leaders and governors with full consideration of the school's context.	Use approved tools only
Governor Training Researching governance topics, preparing for meetings	Useful for background research, but governors should also access quality-assured training from reputable providers.	Use approved tools only

Leaders and governors must NOT use AI to:

- Make significant decisions without appropriate human oversight and governance processes
- Process personal or confidential data through unapproved tools
- Replace professional judgment or statutory responsibilities
- Generate content for official reports without thorough review and verification

9. AI Use in Assessment and Examinations

9.1 Internal Assessments

Teachers will clearly communicate to pupils:

- Whether AI use is permitted for specific assessments
- How AI use should be declared
- What constitutes appropriate vs. inappropriate AI use
- The consequences of AI misuse

For internal assessments, teachers may:

- Permit AI use for specific purposes (e.g., research, idea generation) with proper declaration
- Prohibit AI use entirely for certain assessments
- Design assessments that are less susceptible to AI misuse (e.g., in-class assessments, presentations, practical work)

9.2 External Examinations and Qualifications

For all work submitted for external examination or qualification (including GCSEs, A-Levels, BTECs, and other qualifications):

- The trust will comply fully with JCQ regulations and exam board requirements regarding AI use
- Pupils will be informed of exam board rules on AI use for each qualification
- Pupils must not use AI to complete coursework, controlled assessments, or non-examination assessments unless explicitly permitted by the exam board
- Any permitted AI use must be declared in accordance with exam board requirements
- Failure to comply with exam board regulations may result in disqualification from the examination

Teachers must:

- Stay informed of JCQ and exam board guidance on AI
- Clearly communicate requirements to pupils
- Monitor compliance with exam board regulations
- Report any suspected malpractice to the exams officer and head of centre

9.3 Marking and Grading

- AI must not be used to make final assessment or grading decisions
- Teachers may use AI to support the feedback process (e.g., identifying areas for improvement, suggesting feedback comments), but all feedback must be reviewed, personalised, and approved by the teacher
- Teachers retain full professional responsibility for all assessment judgments

10. Safeguarding and Online Safety

10.1 Safeguarding Principles

All AI use must comply with KCSIE 2025 and the trust's safeguarding and child protection policy.

Staff must be alert to safeguarding risks associated with AI, including:

- Exposure to inappropriate, harmful, or illegal content
- Generation of harmful content by pupils
- Use of AI for bullying, harassment, or abuse
- Sharing of personal information
- Contact with unknown individuals through AI platforms
- Deepfakes and impersonation
- Radicalisation or exposure to extremist content

10.2 Filtering and Monitoring

- The trust will implement appropriate filtering and monitoring of AI tools used on school devices and networks
- The IT department will work with the DSL to ensure adequate safeguarding controls are in place
- Monitoring will be proportionate and respect privacy rights

10.3 Reporting Concerns

Staff must report any safeguarding concerns arising from AI use to the DSL immediately, including:

- Pupils accessing or generating inappropriate content
- Disclosure of abuse or harm through AI interactions
- Pupils sharing personal information inappropriately
- Evidence of bullying, harassment, or harmful behaviour involving AI
- Any other concern about a pupil's welfare

Pupils should report concerns to a trusted adult in school.

Parents should report concerns to their child's school.

10.4 Education and Awareness

The trust will ensure that:

- Pupils receive age-appropriate education about safe and responsible AI use through the curriculum (including computing, RSHE, and PSHE)
- Staff receive regular training on safeguarding risks associated with AI
- Parents are provided with information and guidance on AI use and online safety

11. Data Protection and Privacy

11.1 GDPR Compliance

All use of AI tools must comply with GDPR and the Data Protection Act 2018. The trust will:

- Conduct Data Protection Impact Assessments (DPIAs) for all AI tools that process personal data
- Ensure appropriate data sharing agreements are in place with third-party AI providers
- Maintain records of processing activities involving AI
- Ensure privacy notices inform data subjects about AI use
- Respect the rights of data subjects (including rights of access, rectification, erasure, and objection)

11.2 Data Minimisation

Users must:

- Only input the minimum amount of data necessary into AI tools
- Avoid entering personal, sensitive, or confidential data unless the tool is specifically approved for such use
- Anonymise or pseudonymise data where possible
- Not use pupils' work to train AI tools without explicit consent

11.3 Data Security

The trust will ensure that:

- All approved AI tools have appropriate security measures in place
- Data is encrypted in transit and at rest where appropriate
- Access to AI tools is controlled and monitored
- Data breaches involving AI tools are reported and managed in accordance with GDPR requirements

11.4 Third-Party AI Providers

Before approving any third-party AI tool, the trust will:

- Review the provider's privacy policy and terms of service
- Ensure the provider is GDPR-compliant
- Establish a data sharing agreement where necessary
- Verify the provider's security measures

- Understand where data is stored and processed
- Clarify data retention and deletion procedures
- Ensure the provider will not use trust data to train AI models without consent

11.5 Data Subject Rights

Individuals have the right to:

- Be informed about how their data is used in AI systems
- Access their personal data processed by AI tools
- Request rectification of inaccurate data
- Request erasure of their data in certain circumstances
- Object to processing of their data
- Request restriction of processing

Requests should be directed to the DPO/COO, who will respond within one month.

12. Equality, Diversity, and Inclusion

12.1 Accessibility

The trust is committed to ensuring that AI tools are accessible to all users. We will:

- Ensure AI tools are compatible with assistive technologies
- Provide alternative formats where necessary
- Make reasonable adjustments for pupils with SEND
- Provide training and support to ensure all staff can use AI tools effectively
- Monitor access and usage to identify any barriers

12.2 Reasonable Adjustments for Pupils with SEND

AI tools may provide valuable support for pupils with SEND, including:

- Text-to-speech and speech-to-text functionality
- Reading and comprehension support
- Organisation and planning tools
- Alternative ways to demonstrate learning

The SENCO will:

- Identify opportunities for AI to support pupils with SEND
- Ensure AI tools are included in appropriate Education, Health and Care Plans (EHCPs) or support plans
- Monitor the impact of AI tools on SEND pupils
- Ensure reasonable adjustments are made for AI use in assessments where appropriate

12.3 Bias and Discrimination

The trust recognises that AI systems can perpetuate or amplify bias and discrimination. We will:

- Monitor AI outputs for bias related to protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation)
- Educate staff and pupils about AI bias and how to recognise it
- Take corrective action where bias is identified
- Ensure AI tools do not disadvantage any individual or group
- Comply with the Public Sector Equality Duty under the Equality Act 2010

12.4 Digital Divide

The trust recognises that not all pupils have equal access to technology at home. We will:

- Ensure that AI-enhanced learning is accessible to all pupils during school hours

- Provide alternative options for pupils who cannot access AI tools at home
 - Not disadvantage pupils who do not have access to AI tools outside school
 - Consider the digital divide when setting homework or independent learning tasks
-

13. Training and Support

13.1 Staff Training

All staff will receive training on:

- The principles and appropriate use of AI as set out in this policy
- Safeguarding risks associated with AI and how to report concerns
- Data protection requirements when using AI
- How to recognise AI-generated content and potential misuse
- Ethical considerations in AI use
- How to support pupils in using AI appropriately

Training will be provided:

- During induction for new staff
- As part of annual safeguarding training
- When new AI tools are introduced
- In response to emerging risks or guidance

13.2 Pupil Education

Pupils will receive age-appropriate education on AI through:

- The computing curriculum
- RSHE/PSHE lessons
- Assemblies and tutor time
- Subject-specific guidance from teachers

Education will cover:

- What AI is and how it works
- Appropriate and inappropriate uses of AI
- How to use AI ethically and responsibly
- How to recognise AI-generated content
- The limitations and risks of AI (including misinformation and bias)
- Online safety in relation to AI
- Academic integrity and plagiarism

13.3 Governor and Trustee Training

Governors and trustees will receive training on:

- The strategic implications of AI in education
- Their oversight responsibilities regarding AI use
- Safeguarding and data protection considerations
- How to monitor the impact of AI on teaching and learning

13.4 Parent Engagement

The trust will engage parents through:

- Information on the school website about AI use
- Parent workshops or information sessions
- Newsletters and communications
- Guidance on supporting appropriate AI use at home
- Opportunities to raise questions or concerns

14. Risk Management

14.1 Risk Register

The trust will maintain a risk register that includes AI-related risks, such as:

Risk	Impact	Likelihood	Mitigation
Data breach involving AI tool	High	Medium	DPIAs, data sharing agreements, staff training, approved tools only
Pupils accessing inappropriate content through AI	High	Medium	Filtering and monitoring, safeguarding education, supervision
AI-generated misinformation affecting learning	Medium	High	Staff and pupil training, fact-checking requirements, critical thinking skills
Bias in AI outputs leading to discrimination	Medium	Medium	Monitoring for bias, staff awareness, diverse data sources
Over-reliance on AI reducing critical thinking skills	Medium	Medium	Emphasis on human oversight, balanced approach, pedagogical guidance
Plagiarism or cheating using AI	Medium	High	Clear policies, detection methods, assessment design, education on academic integrity
Cyber security threats (e.g., AI-enhanced phishing)	High	Medium	Enhanced security measures, staff training, vigilance
Pupils' work used to train AI without consent	Medium	Low	Approved tools only, terms of service review, data protection measures
Unequal access to AI tools creating disadvantage	Medium	Medium	Ensure school-based access, alternative options, monitor impact
Reputational damage from AI misuse	Medium	Low	Clear policies, monitoring, swift response to incidents

The risk register will be reviewed termly by the leadership team and annually by the Trust Board.

14.2 Incident Management

Any incidents involving AI misuse, data breaches, or safeguarding concerns will be:

- Reported to the appropriate person (Headteacher, DSL, DPO, IT Leader) immediately
- Investigated thoroughly

- Documented in accordance with trust procedures
- Addressed through appropriate sanctions or support
- Reviewed to identify lessons learned and prevent recurrence

Serious incidents will be reported to the Trust Board and, where required, to external bodies (e.g., ICO, local authority, police).

15. AI Misuse and Sanctions

15.1 Pupil Misuse

Pupils must not submit work that is not their own. Pupils must identify where AI has been used to support their work in accordance with teacher guidance.

Examples of AI misuse by pupils include:

- Using AI to complete assessed work without permission or declaration
- Plagiarising AI-generated content
- Using AI to cheat in examinations or assessments
- Sharing personal information about themselves or others through AI tools
- Generating, sharing, or accessing inappropriate content
- Using AI to bully, harass, or harm others
- Circumventing school filtering or monitoring systems

Where a teacher suspects that a pupil's work is not their own, they will:

1. Investigate the concern (e.g., by discussing the work with the pupil, checking for inconsistencies)
2. Gather evidence
3. Consult with the head of department or senior leader
4. Take appropriate action in accordance with the behaviour policy

Sanctions for AI misuse will be proportionate to the severity of the incident and may include:

- A conversation with the pupil about appropriate AI use
- Requiring the pupil to redo the work without AI support
- A verbal or written warning
- Detention
- Contact with parents/carers
- Internal exclusion
- Suspension (fixed-term exclusion)
- Permanent exclusion (in the most serious cases)
- Reporting to exam boards (for examination malpractice)
- Reporting to police (if illegal content is involved)

The trust will also consider:

- The pupil's age and understanding
- Whether the pupil understood the rules
- The frequency and severity of the misuse
- The impact on others
- Any mitigating circumstances
- The need for education and support alongside sanctions

15.2 Staff Misuse

Staff are expected to use AI tools in accordance with this policy and the staff code of conduct.

Examples of AI misuse by staff include:

- Using unapproved AI tools
- Entering personal, sensitive, or confidential data into AI tools inappropriately
- Using AI in ways that breach data protection or safeguarding requirements
- Plagiarising AI-generated content in professional work
- Using AI to make assessment decisions without appropriate oversight
- Failing to report safeguarding concerns related to AI
- Using AI for personal purposes during work time

Staff misuse will be addressed through:

- Informal discussion and guidance (for minor issues)
- Formal performance management procedures
- Disciplinary procedures (for serious or repeated misuse)
- Reporting to professional bodies or police where appropriate

15.3 Reporting Misuse

Any instances of AI misuse or misconduct involving AI tools should be reported to:

- For pupil misuse: The class teacher, head of year, or Headteacher
- For staff misuse: The Headteacher or Director of Operations
- For safeguarding concerns: The Designated Safeguarding Lead
- For data protection concerns: The Data Protection Officer

16. Monitoring and Evaluation

16.1 Monitoring AI Use

The trust will monitor AI use through:

- Regular audits of AI tool usage
- Analysis of incident reports
- Staff and pupil surveys
- Lesson observations and learning walks
- Review of pupils