



No Barriers to Excellence



Ambition



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Spring Trust

# Artificial Intelligence Policy

<b>Approved by:</b>	Trust Board	<b>Date:</b> 9th December 2025
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<b>Next review due by:</b>	December 2026	

## 1. Aims and scope

Here at Spring Trust 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 school community.

This policy covers the use of AI tools by school staff, Trustees and pupils. This includes generative chatbots such as Google Gemini.

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, Trustees 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

### 1.1 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

## 2. 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) – 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 \(DPA 2018\)](#)

### 3. 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"> <li>• Ensure that AI solutions are secure and safe for users and protect users’ data</li> <li>• Ensure we can identify and rectify bias or error</li> <li>• Anticipate threats such as hacking</li> </ul>
Appropriate transparency and explainability	<ul style="list-style-type: none"> <li>• Be transparent about our use of AI, and make sure we understand the suggestions it makes</li> </ul>
Fairness	<ul style="list-style-type: none"> <li>• 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</li> </ul>
Accountability and governance	<ul style="list-style-type: none"> <li>• Ensure that the trust board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI</li> </ul>
Contestability and redress	<ul style="list-style-type: none"> <li>• Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology</li> <li>• Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment</li> </ul>

### 4. Roles and responsibilities

#### 4.0 Trust board

The Trust Board will:

- Take overall responsibility for monitoring this policy and holding the Executive to account for its implementation
- 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 Trust safeguarding lead, 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
- Review and update this AI policy as appropriate, and at least annually

### **4.1 Executive Team**

- Ensure the headteacher and digital champions are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the school

### **4.2 Headteacher**

The headteacher will:

- Take responsibility for the day-to-day leadership of AI use in the school
- Have awareness of the use of AI in reference to data protection legislation
- Ensure that the use of AI is in accordance with Keeping Children Safe in Education and the Trust's child protection and safeguarding policy
- Ensure that the guidance set out in this policy is followed by all staff
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- 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

### **4.3 Data protection officer (DPO)**

The data protection officer (DPO) is available to advise on our compliance with data protection law, including in relation to the use of AI.

Refer to the Data Protection Policy for further information regarding the DPO.

### **4.4 Trust safeguarding lead (TSL)**

The TSL 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) and the school's child protection and safeguarding policy

- Understanding the filtering and monitoring systems and processes in place on school devices

#### **4.5 Trust Computing Subject Lead**

The Trust Computing Subject Lead will make sure pupils are taught about the effective use and potential risks of AI which will be built into the Trust existing e-safety policy.

Our Computing subject leads are responsible for the day-to-day management of AI use in schools.

#### **4.6 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 suitable AI tools and explore new AI tools and use them in accordance with this policy, ensuring that they check for bias and that it meets the Trust's expectations on data privacy etc.
- Seek advice from the Computing Leads as appropriate
- Report safeguarding concerns to the DSL in line with our Trust child protection and safeguarding policy
- Only use a closed generative AI tool, such as Google Gemini (enabled for staff accounts and works with Google workspace related apps i.e. docs, slides)
- Ensure there is no identifiable information included
- 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.

Staff should not use AI live in front of pupils due to the risk of errors/bias etc. Staff need to carefully assess the outputs of AI.

#### **4.7 Pupils**

Pupils must:

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

## **5. Staff and Trustees' use of AI**

### **5.1 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.

Google Gemini is restricted to the school domain so only works with school accounts connected to the Google domain.

Wherever Google Gemini is 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 Trustee 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 has approved its use doesn't mean it will always be appropriate.

### **5.2 Process for approval**

Gemini is managed via the Google admin console which allows the Trust, via the Trust IT provider, to select the users that can access it which allows the management of the kind of data it can collect.

The Trust's IT provider will get notified of any 3<sup>rd</sup> party apps that need approval to work with the Gemini app.

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

### **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 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 will follow the personal data breach procedure outlined in our data protection policy. Please also refer to section 10 of this policy.

### **5.4 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.

### **5.5 Bias**

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output.

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.

### 5.6 Raising concerns

We encourage staff to speak to their Headteacher and Trustees to speak to the Executive 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.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with our Trust's child protection and safeguarding policy.

### 5.7 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

We will never:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

## 6. Educating pupils about AI

At Spring Trust 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.

It is used in aspects of the curriculum and AI tools are used to aid learning, while also covering subjects such as:

- 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

## 7. Use of AI by pupils

We recognise that AI has many uses to help pupils learn.

Pupils may only use the inbuilt Google AI in the following circumstances::

- 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.

## 8. Staff training

Staff training will be delivered to ensure a good understanding of AI and to remind staff on safe internet use and online safeguarding.

Digital champions will ensure they stay abreast of good practice and cascade these to their staff body. The Trust Computing subject lead will be responsible for ensuring staff have access to continuing professional development opportunities on AI.

## 9. Referral to our child protection and safeguarding policy

The Trust is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material
- Harmful content
- Harmful advertisements and promotions
- Bullying

Where there are safeguarding concerns arising from the use of generative AI, a report must be made to the relevant DSL immediately.

Any such incident will be dealt with according to the procedures set out in the Trust's child protection and safeguarding policy and child protection referral process.

## 10. Breach of this policy

### 10.1 By staff

Breaches 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.

### 10.2 By pupils

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

## 11. 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 the Trust Board whenever there is a significant change to either AI use 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 Trust board at least annually.

All teaching staff are expected to read and follow this policy. Headteachers are responsible for ensuring that the policy is followed.

We will ensure we keep members of the school community 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 schools.

## 12. Links with other policies

This AI policy is linked to our:

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

## Appendix A - Staff Guidelines

All staff are required to follow the guidance below, in addition to the points set out in the Trust AI Policy.

### 1. Be Purposeful and Professional

- Use AI tools to support your professional work e.g., for lesson planning, resource creation, admin efficiency, or ideas generation.
- Ensure the tool enhances learning or reduces workload without replacing your professional judgment or teacher-pupil interaction.

### 2. Be Aware of Data Privacy

- **Never** input **personal, sensitive, or identifying data** (e.g., pupil names, SEN info, safeguarding concerns, assessment outcomes) into AI platforms, especially public ones.
- Only closed tools (e.g. Google Gemini) should be used and never with confidential data.

### 3. Maintain Accuracy and Critical Thinking

- AI-generated content is not always reliable or accurate -fact-check important information, particularly in subject-specific areas or sensitive topics.
- Do not copy and paste AI-generated content directly into communications or teaching without checking it carefully.
- Adapt don't adopt with AI outcomes (we know more about the level/needs of our pupils than AI does)

### 4. Uphold Safeguarding and Inclusion Principles

- Do not use AI to create content that could be biased, stereotypical, or exclusionary.
- Monitor how AI-generated materials reflect and respect diversity and inclusion, in line with our Trust values.

### 5. Keep It Transparent

- Be honest about your use of AI when it contributes significantly to a task or output (e.g., drafting letters, designing resources)
- Avoid passing off AI-generated work as solely your own if it's part of collaborative work or external communication.

### 6. Avoid Use with Pupils (for now)

- Pupils should not be using AI tools unless it is part of a structured, teacher-led activity that has been approved by a leader.
- Do not set homework or tasks that require AI tools unless pupils have equal access and the task has educational merit.
- Don't use AI "live" with your class

### 7. Report Any Concerns

- If you're unsure about whether a use of AI is appropriate, or if you encounter something concerning, raise it with your line manager or the Computing Lead.