Brontë Academy Trust
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Artificial Intelligence (AI) Policy

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Introduction

Artificial Intelligence (AI) is rapidly evolving, with both positive and negative implications for education and society. Generative AI (GenAI), a newer form of AI, has gained widespread interest and is increasingly used across various sectors. Its accessibility on smartphones, tablets, laptops, and desktops is driving rapid adoption, with future advancements likely to expand its reach even further.

The rapid evolution of AI necessitates ongoing development, refinement, and updates to policies and guidance to keep pace with emerging functionality and trends. This presents a significant challenge, requiring AI users to thoughtfully consider their usage in alignment with the principles outlined here, even as new contexts emerge.

In primary education, AI presents opportunities to reduce workload for the school and trust workforce, to enhance personalised learning, support professional development, and more. The focus of the use of AI shouldn't be the model itself. Drivers such as workload reduction without compromising quality but supported by AI are the most effective.

This Artificial Intelligence (AI) Policy should be read and considered alongside other school and trust policies and guidance, including:

- Staff Code of Conduct
- Data & E-security Breach Prevention & Management Policy
- Data Protection Policy
- Disciplinary Policy
- Online Safety Policy
- Child protection and Safeguarding Policy
- Other policies introduced relevant to AI.

In addition, the Trust has published Artificial Intelligence (AI) Acceptable Use Guidance which should be considered alongside this Policy.

National policy and guidance should also be read alongside this policy, including:

- Department for Education (DfE) Generative Artificial Intelligence Guidance
- Information Commissioner's Office (ICO) Guidance on AI and Data Protection
- Keeping Children Safe in Education
- Ofsted's Approach to Artificial Intelligence
- Other guidance and policies introduced relevant to AI.

Scope

This policy applies to all staff and stakeholders within the Trust who engage with AI technologies in any capacity.

Principles

Any use of AI must follow the Trust's vision and values, strategic plan or the Trust's collective consistencies.

Whether directly, or indirectly, the overarching goal of AI is to assist students in achieving educational goals and improve outcomes. This may be through workload reduction or teacher time saving techniques for example, or through Trust agreed third party software which assists in the provision of school services.

The Trust is committed to the ethical use of Artificial Intelligence (AI) to enhance learning and administrative processes. The Trust and schools must prioritise transparency, fairness, and accountability in all AI applications. AI tools will be used to support educational goals while respecting the privacy and rights of all students and staff. We must ensure that AI systems are designed and implemented to avoid bias, promote inclusivity, and uphold the highest standards of integrity and responsibility.

AI must never replace human judgment; it should enhance knowledge and decision making. Equally, the loss of human interaction is a risk that should be mitigated in an organisation, profession and sector that is built on human relationships.

Bronte Academy Trust encourages the careful and considerate use of Artificial Intelligence (AI) but advises using Generative AI cautiously. Users must adhere to this policy, other related school and trust policies, and that provided in national guidance and policies. Users must be familiar with and adhere to all related policies applicable to the use of AI.

When engaging new (or renewing) subcontractor services to the trust, potential use of AI by those subcontractors must be identified and assessed before contracts are agreed.

Appendix A provides some example staff uses with guidance.

Staff should access AI-related training provided by the Trust, school, and/or other relevant providers based on the needs of their school or organisation.

Data protection is everyone's responsibility. Under no circumstances should personal or identifying information about staff, students or other individuals be entered into any AI system without prior agreement from the Data Protection Officer (DPO). In these circumstances, a Data Protection Impact Assessment (DPIA) will be carried out to ensure that appropriate levels of data and cyber security are present to protect personal information.

Premium paid-for or free-to-use Generative AI models that do not have commercial data protection outside of Trust's closed infrastructure, and where it is not stored in data centres compliant under GDPR will not be authorised for sharing personal or identifying information about staff, students or other individuals.

The Gemini chat experience is covered under the Google Terms of Service and Google Workspace Additional Product Terms. Users accessing Gemini with their Google Workspace for Education accounts also have added data protection, meaning their data is not used or human reviewed to improve AI models.

As an education user whose use of Google Drive is subject to the Workspace for Education Terms of Service, your uploads, queries and the model's responses in Notebook LM will remain private to you.

Incidents of inappropriate use of Generative Artificial Intelligence, including the use of personal and/or sensitive data, will be dealt with in line with relevant school and Trust Data Protection policies/procedures and, if necessary, associated Human Resources policies and procedures including the Disciplinary Policy.

Generative AI may present plausible information that is: inaccurate; inappropriate; biased; reinforces stereotypes; taken out of context and without permission; misinformation; and out of date; and unreliable. Hallucinations occur when AI detects patterns or objects that don't exist, leading to outputs that are incorrect or meaningless. Users should only use information if they are qualified to verify its accuracy. Users must quality assure the output before deciding to use it.

Staff must not allow or cause intellectual property, including students' work, to be used to train Generative AI models, without appropriate consent or exemption to copyright. Students' work should not be used to train Generative AI without written parental consent, if the student is aged under 18

To prepare students to contribute to society and the future workplace, students should be educated about appropriate use, benefits, risks, and mitigations associated with AI, including Generative Artificial Intelligence. Students must understand the consequences of the misuse of AI or unethical behaviour. Students do not necessarily need direct access to AI for these purposes.

User age restrictions vary between models and must be adhered to. Most are age 18+, some 16+ or 13+.

The use of Generative AI models by students is not encouraged. Bronte Academy Trust primarily sees Generative AI models as a tool for staff. Appendix A provides some example staff uses with guidance.

Staff should report any misuse of AI to the Headteacher. Misuse of AI is defined as any action or use of AI that does not comply with academy and/or policies, including this policy, or the use of AI for any unethical or immoral purpose. The Trust will ensure that staff understand the consequences of misuse of AI or unethical behaviour.

If an external individual wishes to raise a complaint about the use of AI, this would need to be raised in line with the Bronte Academy Trust Complaints Policy & Procedure.

Regular updates will be communicated to staff and pupils when applicable, acknowledging that AI is a developing technology.

Staff and pupils should have sufficient knowledge and guidance to ensure that they can recognise where AI is useful, and when AI is counterproductive.

Review

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

National Guidance

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

Keeping Children Safe in Education (KCSIE) KCSIE states:

> *'All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues.'*

DfE (Department for Education) states:
' *[Schools and colleges should] ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through Generative AI - keeping children safe in education provides schools and colleges with information on:*

- *what they need to do to protect students and students online*

- *how they can limit children's exposure to risks from the school's or college's IT system'*

KCSIE is available here: https://www.gov.uk/government/publications/keepingchildren-safe-in-education--2

Department for Education (DfE) Generative AI in Education DfE guidance is available here: https://www.gov.uk/government/publications/generative-artificial-intelligenceineducation/generative-artificial-intelligence-ai-in-education

Ofsted's approach to artificial intelligence (AI) Ofsted states:
'*Ofsted will not directly inspect the quality of AI tools. It is through their application that they affect areas of provision and outcomes such as safeguarding and the quality of education. Leaders, therefore, are responsible for ensuring that the use of AI does not have a detrimental effect on those outcomes, the quality of their provision or decisions they take.'*

'Ofsted supports the use of AI by providers where it improves the care and education of children and learners. We recognise that these tools can help providers make better informed decisions, reduce workload and lead to innovative ways of working.'

Regulatory principle	**Providers are expected to…**
Safety, security, and robustness	Assure themselves that AI solutions are secure and safe for users and protect users' data. Ensure they can identify and rectify bias or error.
Appropriate transparency and explainability	Be transparent about their use of AI, and make sure they understand the suggestions it makes.
Fairness	Only use AI solutions that are ethically appropriate – in particular, we expect providers to consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.
Accountability and governance	Ensure that providers and their staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance, and use of AI.

Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology. Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.

Ofsted's guidance is available here:
https://www.gov.uk/government/publications/ofsteds-approach-to-ai

Information Commissioner's Office (ICO) Guidance on AI and Data Protection
https://ico.org.uk/for-organisations/uk-gdpr-guidance-andresources/artificialintelligence/guidance-on-ai-and-data-protection/

Appendix A – Example Staff Responsible Use

Item	Responsible Use Case	Guidance
Transforming students work	Convert a short piece (1-2 sentences) of a student's writing to an image that represents the fictional story.	Teacher inputs the extract into Generative AI, turns off the data projector, quality assures the image, then shares it with the student.
Lesson planning and resource creation	Generate lesson plan, slides and resources	Engage with Gemini to draft then refine the lesson plan via AI and own editing. Quality assure the lesson plan. Use Aila (Oak National Academy) and quality assure the outcome. Create slides in Canva via an education license and quality assure the slides/resources.
Documentation	Summarise research or a (non personal data) report.	Attach the report to ChatGPT and ask it to summarise the research/report. Quality assure the outcomes by cross referencing key elements with the original research/report.
Management Information	Generate letters and emails using Ask Arbor with the Arbor Management Information System (MIS)	Arbor is a secure data environment and is GDPR compliant. The data does not train the underlying AI model. A DPIA has been undertaken.