Venn Academy Trust

Artificial Intelligence Policy

Artificial Intelligence
Venn wide

1	Owned and reviewed by	Director of Safeguarding, Attendance, Risk & Welfare Director of Operations
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6	Related documents (if applicable)	Venn Behaviour and Relationship Policy Venn Safeguarding and Child Protection Policy
7	Applies to	☒ All staff ☐Support staff ☐Teaching staff
8	Available on	☒Trust website ☒School website ☒SharePoint

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1. Aims and scope

Within Venn we understand the valuable potential the artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to 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 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, governors/trustees, and pupils. This includes generative chatbots such as ChatGPT and Microsoft Co-pilot (please note, this list is not exhaustive)..

This policy also set the boundaries of acceptable AI use for pupils

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, governors and pupils.

● Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR.

Protect the use of AI for pupils.

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.

1.2 What is AI and Generative AI?

Artificial intelligence (AI) refers to computer systems that can perform tasks which typically require human intelligence. One type, *generative AI*, creates new content (such as text, images, audio, code or video) based on patterns learned from large datasets. Tools such as ChatGPT, Microsoft Copilot and Google Gemini are examples of generative AI built on large language models (LLMs). These tools can be useful for drafting and planning, but they may also produce plausible-sounding errors ("hallucinations"), reflect bias present in training data, or generate content that is unsuitable for pupils or a Trust/school context. Outputs must always be checked and adapted by the user.

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) – 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).

3. Regulatory principles

We follow the 5 principles set out in the AI regulation white paper.

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 error.

● Anticipate threats such as hacking.

Appropriate transparency and explainability

● Be transparent about our use of AI and make sure we understand the suggestions it makes.

Fairness

● 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.

Accountability and governance

● Ensure that the governing board/trust board and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI. This will be achieved through a delegation of roles within the organisation. For example, breaches need to be reported to the data protection officer and artificial intelligence lead.

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.

4. Roles and responsibilities

4.0 AI lead

The Principal will:

● Take responsibility for the day-to-day leadership and management of AI use in the school.

● Liaise with the data protection link (DPO) in each school who will liaise with the Venn Central Team, 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.

● 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, AI lead and data protection impact assessments. A list of approved AI tools will be stored centrally on sharepoint, where all staff can access.

4.3 Data protection officer (DPO)

The data protection officer (DPO) is responsible for monitoring and advising our compliance with data protection law, including in relation to the use of AI.

4.4 Designated 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).

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 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 5).
- Seek advice from the data protection officer / IT / AI lead.
- 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.

4.6 Pupils

Pupils must:

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

The updated acceptable use policy now includes the use of AI in school and how children should be using this tool.

5. Staff and governors/trustees use of AI

5.1 Approved use of AI

We are committed to helping staff and governors 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, accuracy and appropriateness of the final document remains the professional responsibility of the person who produced it. Staff should also be aware that Trust/school filtering and monitoring systems cannot control the content that an AI service produces, so outputs must be checked carefully for suitability, bias, safeguarding risks and factual accuracy.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff or governors 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.

Given how rapidly AI is evolving, please note that the school will keep an updated list of approved new AI tools.

5.1 Approved tools and their uses

Gamma - Creating slides for a school setting.

Arbor - AI Emails, SMS, Letters.

Co-Pilot - Writing emails.

Chat GPT – Anonymous support with research, lesson plans, writing emails and letters. (All use of this website must remain anonymous in line with the school's GDPR rules).

Key for primary leaders (KeyGPT) - Writing a job advert and creating interview questions, creating images to aid with learning.

Notebook - LM Through google.

Teachmate AI – Support with pupil reports, planning, sequencing.

'Open AI' infant of ChatGPT

TeacherGENie AI tool - that is accessible through Century to help support learning through extending questions based on existing nuggets.

A note on your data security in KeyGPT: This is The Key's AI-powered assistant for schools, included in your membership. KeyGPT is a closed generative AI tool, which uses published content from The Key to improve the quality of its response, known as retrieval augmented generation (RAG). The Key has prompted the AI to give you more complete, specific responses, and instruct the AI to limit bias as much as possible.

However, all AI models can make mistakes, so do check any important information KeyGPT gives you.

5.2 Process for approval

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

The Principal is responsible for signing off on approved uses of AI, or new AI tools, considering advice from the AI lead, the DPO and data protection impact assessments. The Principal should contact the DPO or DOO or the DOS to have approval for a new tool.

5.3 Data protection and privacy

To keep data secure, staff, governors/trustees and contractors must not enter any personal, special category, sensitive or confidential information (including information that could identify a pupil, parent/carer or member of staff), this includes (but is not limited to) text, datasets, audio records, photographs and videos
into open generative AI tools or chatbots. Where an approved "closed" tool is being considered for limited use with personal data, this must only happen with the advice/approval of the DPO/DOS/DOO and completion of an appropriate data protection impact assessment (DPIA).
If personal and/or sensitive data is entered into an unauthorised generative AI tool, or if there is any suspicion that data has been exposed or misused through an AI tool,

this will be treated as a potential personal data breach. It must be reported immediately in line with the Trust's personal data breach procedure (including notification to the DPO) and managed under the Trust's Data Protection Policy.

5.4 Intellectual property

Most generative AI tools may use inputs submitted by users to train and refine their models. Pupils generally own intellectual property (IP) rights to the original content they create. Staff must not upload or use pupils' work (or other copyrighted materials) to train, fine-tune or improve any AI model or service unless there is a clear legal basis, and appropriate permission/consent has been obtained. Where there is any doubt, staff must seek advice before proceeding.

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

Wearables

This includes Smart watches, glasses, Headsets and other wearables.

Smart glasses pack hidden technology into traditional eyewear, allowing you to capture high-definition, hands-free photos and POV videos, listen to podcasts via open-ear audio, and utilize built-in AI assistants to read notifications, translate languages, and identify objects. This can be a safeguarding risk for our pupils and staff. This technology alongside new emerging technologies will be reviewed on a case-by-case basis.

Deepfakes and Photos

Deepfakes are digitally altered or AI-generated photos, videos, or audio recordings. They pose severe risks for digital impersonation, fraud, and non-consensual image abuse. To minimise the risk of this, the trust has devised rules around images which are published on any social media platform, school website or any other method.

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 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 errors 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 policy & procedure.

5.6 Raising concerns

We encourage staff and governors to speak to the principal 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.

5.7 Ethical and responsible use

We will consider if we:

● Use generative AI tools ethically and responsibly.

● Remember the principles set out in our school'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 governors/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.

● Violate intellectual property laws including copyright and moral rights.

6. Educating pupils about AI and how AI is used in the workplace

Here at Venn, 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.

Pupils are taught in the curriculum about the potential benefits of using AI tools to aid their 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 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 computing lessons or specific PSHE lessons about AI-generated images.

●As a tool for inclusion, such as turning text into speech, or speech into text.

●To produce parts of schoolwork when allowed (i.e. making an image as part of a poster they are creating)

●To help practice or receive coaching (i.e. ask me questions to help me practice differential equations')

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. This will be closely monitored by staff and leaders.

This list of AI misuse is not exhaustive.

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.

● Seek advice on personal, medical or other sensitive issues in place of a trusted adult

7.1 SEND specific considerations.

The school must consider the implications of the specific special educational needs of the pupils at Venn. Particularly those with Autistic Spectrum conditions and those who are highlighted as vulnerable. Education around AI and the potential issues will be specifically taught to the children in PSHE and Computing sessions. Extra sessions will also be taught as and when incidents arise.

7.2 Identifying possible AI misuse

Where staff have concerns that work may not be a pupil's own, possible indicators (on their own or in combination) may include:

- Inconsistencies in tone, vocabulary, complexity, formatting, or style compared with the pupil's usual work.
- A logical flow that looks "polished" but contains gaps in reasoning, inaccurate claims or vague generalities.
- American spellings/terminology, unusual currency/units, or references that do not match the UK context or the taught content.

- Unverifiable, incorrect or fabricated references/quotes, or a lack of specific sources where you would expect them.
- A mismatch between drafts/classwork and final submission (for example, sudden unexplained improvement).
- Overly verbose, generic or “template-like” conclusions.
- Fails to use lesson materials or explicitly specified curricular, and might draw on sources not covered in teaching or from other contexts (i.e. American, Scottish or Welsh qualifications).

These indicators are not proof on their own. Where concerns remain, staff should follow the academy/school’s assessment and behaviour processes, consider reviewing work in progress, and speak with the pupil to check understanding and authenticity.

8. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

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

9. Staff training

Staff will be kept up to date with developments in AI, and how they will be able to develop and improve their practice on a regular basis:

● How you ensure good understanding of AI.

● Who will be responsible for ensuring staff have access to continuing professional development (CPD) opportunities on AI.

● How the school will stay abreast of good practice and what mechanisms you have in place for sharing it.

10. Breach of this policy

10.1 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 principal immediately.

10.2 By governors/trustees

Governors/trustees found in breach of this policy will be dealt with in line with our staff code of conduct policy.

10.3 By pupils

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

Any breach of use for pupils might also be dealt with by exam boards or other qualification bodies.

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 Principal and Computing lead 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/trust board at least annually. All teaching staff are expected to read and follow this policy. The principal is responsible for ensuring that the policy is followed.

The Principal will monitor the effectiveness of AI usage across the school.

We will ensure that 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 school.

For further reading and advice on the use of AI in education please see:

Generative artificial intelligence (AI) in education - GOV.UK

Public Sector Equality Duty and bias

When selecting and using AI tools, the Trust and its academies/schools will have due regard to the Public Sector Equality Duty under the Equality Act 2010. AI tools can reflect and amplify bias, including bias related to protected characteristics. Staff must apply professional judgement and critical evaluation to AI outputs and raise concerns where an output could disadvantage or discriminate against any pupil or group. Any concerns from pupils or parents/carers about unfair treatment connected to AI use will be handled through the relevant academy/school's usual complaints processes

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Assessment policy
- Homework policy
- Staff code of conduct
- ICT acceptable use policy
- Online safety policy
- Equality policy
- Behaviour and relationships policy
- Child protection and safeguarding policy