



Brighter Futures
Educational Trust

ARTIFICIAL INTELLIGENCE (AI) POLICY

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CONTENTS

1. Aims and scope
 2. Legislation and guidance
 3. Roles and responsibilities
 4. Process for approving AI use
 5. Use of AI by staff across the Trust, trustees and governors
 6. Educating pupils about AI
 7. Use of AI by pupils
 8. Formal assessments
 9. Staff training
 10. Referral to our child protection policy
 11. Breach of this policy
 12. Monitoring and transparency
 13. Links with other policies
- Appendix 1: Approved AI tools

1. AIMS AND SCOPE

Here at Brighter Futures Educational Trust (BFET) 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 trust community.

This policy covers the use of AI tools by staff across the trust, trustees, local governors and pupils. This includes generative chatbots such as ChatGPT and Google Bard (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff across the trust to explore AI solutions to improve efficiency and reduce workload
- Prepare staff across the trust, trustees, local 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 across the trust, trustees, local governors and pupils, including in compliance with intellectual property law
- Protect the privacy and personal data of all staff across the trust, trustees, local governors and pupils in compliance with the UK GDPR

Human oversight

AI will support professional decision making but will never replace it.

Decisions relating to safeguarding, SEND provision, exclusions, disciplinary matters, complaints, performance management, employment, admissions or pupil welfare must always be made by an appropriately authorised member of staff.

2. LEGISLATION AND GUIDANCE

This policy reflects good practice guidelines / recommendations in the following publications:

- [Generative artificial intelligence \(AI\) in education](#), published by the Department for Education (DfE)
- [Generative AI: product safety standards](#), published by the DfE
- [How Ofsted looks at AI during inspection and regulation](#), published by Ofsted
- [AI use in assessments](#), published by The Joint Council for Qualifications

This policy 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. ROLES AND RESPONSIBILITIES

3.1 Board of trustees

The board of trustees will:

- Take overall responsibility for monitoring this policy and holding trust and school leaders to account for its implementation in line with the trust's AI strategy
- Review and update the AI policy as appropriate, and at least annually.
- Ensure trust and school leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the trust
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the data protection officer (DPO), and data protection impact assessments. Delegate, to the ELT, the approval of use of AI.

Trustees will adhere to the guidelines below when using generative AI tools themselves:

- Use only approved AI tools (see section 5 and appendix 1)
- Ensure there is no identifiable information included in what they put into generative AI tools (unless strictly necessary and they have been approved to do so by the DPO).
- Seek advice from the data protection officer as appropriate
- Acknowledge or reference any use of generative AI in their work
- Fact-check results to make sure the information is accurate

3.2 School leaders

School leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their school
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Liaise with the designated safeguarding lead (DSL) to ensure that the use of AI in the school is in accordance with Keeping Children Safe in Education (KCSIE), and the school'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
- Make sure pupils are taught about the effective use and potential risks of AI

3.3 Trust data protection officer (DPO)

The trust-level 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 Carole Connelly and is contactable via carole@schoolposervice.com

3.4 Designated safeguarding leads (DSL)

DSLs are 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 KCSIE and the school's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices

3.5 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
- Seek advice from the DPO/IT lead/ DSL as appropriate
- Report safeguarding concerns to the DSL in line with the trust's child protection and safeguarding policy
- Ensure there is no identifiable information included in what they put into generative AI tools (unless it is strictly necessary and they are approved to do so - they should check with the DPO/IT lead/ DSL where appropriate)

- 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.

3.6 Pupils

Pupils must:

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

4. PROCESS FOR APPROVING AI USE

The ELT is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO/DSL.IT lead as appropriate.

Any use of generative AI by staff and pupils will be risk assessed, which will include plans for mitigating against unauthorised use cases. The intended use case will be specified and have clear benefits that outweigh the risks.

As part of this process, we will seek assurances from suppliers of AI tools about how their products meet the DfE's [AI product safety standards](#).

If it is strictly necessary to use an AI tool to process personal data, we will carry out a data protection impact assessment (DPIA) in addition to the risk assessment. The DPO will advise on this. If the use case is approved, we will also update our privacy notices accordingly.

In the case of AI tools intended for use by pupils, the risk assessment process must consider:

- Age restrictions set by AI tools
- Statutory requirements of [KCSIE](#) and our child protection and safeguarding policy
- [Filtering and monitoring standards](#) to make sure we have the appropriate systems in place to protect pupils from harm
- The DfE's [AI product safety standards](#)

5. USE OF AI BY STAFF ACROSS THE TRUST, TRUSTEES AND GOVERNORS

5.1 Approved use of AI

At BFET we are committed to helping staff, trustees and local 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. Technology, including generative AI, should not replace the valuable relationship between teachers and pupils.

AI should be viewed as a professional support tool rather than an expert. Staff must always apply their own professional judgement when planning learning, communicating with parents/carers, producing reports or making decisions relating to pupils. The responsibility for the quality, accuracy and appropriateness of any AI-assisted work remains with the member of staff.

Any content produced using AI requires critical judgement to check for appropriateness and accuracy. Whatever tools or resources are 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, trustee or local governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, trustees or local 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 trust has approved its use doesn't mean it will always be appropriate.

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their senior leader to discuss any ideas they may have with regards to using AI, so they – in consultation with others, as appropriate – can assess whether they deem it to be a satisfactory new method of working.

5.2 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into generative AI tools or chatbots that have not been approved as safe for this use case.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, BFET 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 11 of this policy.

5.3 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. In addition, materials created by teachers may be copyright material. Examples of what may be deemed original creative work include:

- Essays, homework or any other materials written or drawn by a pupil aside from multiple-choice questions responses

- Lesson plans created by a teacher
- Prompts entered into generative AI tools

BFET will not allow or cause intellectual property, including pupils' work, to be used to train generative AI models without appropriate consent or exemption to copyright.

BFET is aware that secondary infringement could happen if AI products are trained on unlicensed material and outputs and then used in schools or published more widely, such as on the trust's website. This may include:

- Publishing a policy that has been created by an AI tool that used input taken from another school's policy without that school's permission
- Using an image on a website that has been created by an AI tool using input taken from the copyright holder without their permission

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

5.4 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.

BFET will ensure we can identify and rectify bias or error by training staff in this area.

We will 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.

5.5 Raising concerns

We encourage staff to speak to their school leader in the first instance if they have any concerns about the potential use of AI, or the use of AI that may have resulted in errors that led 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 the trust's child protection policy.

5.6 Ethical and responsible use

BFET 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

Staff members, trustees and local governors 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

6. EDUCATING PUPILS ABOUT AI

Here at BFET 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 best use of generative AI.

Teaching about AI will be age-appropriate and adapted to meet the needs of individual pupils, recognising that many of our learners require additional support to develop digital literacy, online safety awareness and critical thinking skills.

Across the Trust, pupils will be taught:

- what artificial intelligence is and how it is used in everyday life
- that AI can support learning but should not replace independent thinking, creativity or problem-solving
- that AI can make mistakes, provide inaccurate information ("hallucinations") and reflect bias within the information it has been trained on
- how to question, evaluate and verify AI-generated information before accepting it as accurate
- how to use AI safely without sharing personal, sensitive or identifying information
- how AI relates to online safety, including recognising manipulated images, misinformation, scams and harmful content
- the ethical use of AI, including honesty in schoolwork, respecting copyright and avoiding plagiarism
- when AI may and may not be used within school.

Teaching about AI will be delivered through Computing, PSHE, Online Safety, Careers Education and other curriculum opportunities where appropriate. Staff will use professional judgement to ensure learning is appropriate for pupils' age, developmental stage and individual SEND needs.

- where AI tools are used directly with pupils, they must be:
- approved by the Trust
- used under appropriate staff supervision
- suitable for the age and needs of the pupils
- supported by the Trust's filtering, monitoring and safeguarding arrangements.

The Trust recognises that AI can improve accessibility by supporting reading, writing, communication, translation and personalised learning for some pupils. Such use will always be carefully planned and supervised by staff.

Recognising the needs of many of our pupils, staff will explicitly teach that AI-generated responses should never replace seeking help from a trusted adult. Pupils will be encouraged to speak to a member of staff whenever online or AI-generated content causes concern, confusion or distress.

Where appropriate, parents and carers will be provided with guidance on how AI is used within the Trust and how they can support the safe and responsible use of AI at home.

7. USE OF AI BY PUPILS

BFET recognises that AI has many uses to help pupils learn.

Pupils may use AI tools:

- That have been approved for their use in school
- 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.

We consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures.

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 or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils
- Input offensive, discriminatory or inappropriate content as a prompt

8. FORMAL ASSESSMENTS

BFET will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our assessment policy for more details.

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

9. STAFF TRAINING

The Trust recognises that AI technologies continue to evolve rapidly. Staff will receive regular opportunities to develop their understanding of AI, enabling them to use approved tools confidently, safely and ethically.

The Trust and headteachers will:

- Ensure a good understanding of AI
- Cover AI use in staff training on safe internet use and online safeguarding
- Ensure staff have access to continuing professional development (CPD) opportunities on AI
- Stay abreast of good practice and monitor the effectiveness of AI usage across the schools.
- Provide guidance on data protection, copyright, intellectual property and safeguarding when using AI.
- Support staff to critically evaluate AI-generated outputs and understand the limitations, bias and potential inaccuracies of AI systems.
- Review approved AI tools regularly to ensure they remain compliant with Trust expectations, DfE guidance and data protection legislation.

- Share examples of effective practice across the Trust to improve teaching, learning and operational efficiency while maintaining professional standards.

10. REFERRAL TO OUR CHILD PROTECTION 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 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.

11. BREACH OF THIS POLICY

11.1 By staff

Breach of this policy by staff will be dealt with in line with the trust's 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 the trust with access to:

- The generative AI application in question (whether or not it is one authorised by the trust)
- 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 senior leader immediately.

11.2 By trustees or local governors

Trustees or local governors found in breach of this policy will be dealt with in line with the Trustee/Governors code of conduct.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with the trust's Behaviour Policy.

12. 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 ELT whenever there is a significant change to either AI use by the trust 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 board of trustees at least annually.

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

The ELT will monitor the effectiveness of AI usage across the Trust.

13. LINKS WITH OTHER POLICIES

This AI policy is linked to our:

- Data Protection Policy
- Child Protection Policies
- Assessment Policy
- Exams Contingency Plan
- Behaviour Policy
- Staff Code of Conduct
- Trustee Code of Conduct
- Governor Code of Conduct
- ICT Acceptable Use Policy
- Online Safety Policy
- Equality and Accessibility Policy
- Cyber Security Policy

- Complaints Policy

Appendix 1: Approved AI tools

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
KeyGPT	• All Staff	• Drafting letters to parents/carers, job descriptions, adverts, interview questions and administrative communications.
Oak National Academy AI lesson planner	• Teachers • HLTA	Lesson planning, curriculum sequencing, resource ideas and adaptation of teaching activities.
Microsoft 365 Copilot	Staff with Trust licences	Drafting internal guidance, reports, presentations, meeting notes, lesson planning, summarising documents, data analysis, research and idea generation
MIS AI function	Authorised staff	Drafting communications, analysing attendance or behaviour trends, generating reports and supporting administrative tasks within the MIS.
AI notetaker applications (e.g. Microsoft Teams Intelligent Recap)	Senior Leaders and authorised staff	Producing meeting notes, summaries and agreed actions where appropriate and in accordance with GDPR and participant consent requirements.
Education-specific AI platforms approved by the Trust	Teaching Staff	Creating teaching resources, adapting learning materials, generating quizzes, differentiated activities and curriculum planning.
HR compliance AI tools	HR Team and Senior Leaders	Drafting policies, recruitment documentation, interview questions, HR guidance and employment documentation.

APPROVED AI TOOLS	APPROVED FOR	APPROVED USES
ChatGPT (Enterprise, Education or Trust-approved version only)	All Staff	Drafting policies, letters, reports and newsletters; lesson planning; creating teaching resources; generating presentations; summarising information; idea generation; creating images, icons and illustrations; editing and enhancing photographs; producing cartoon or stylised versions of photographs for newsletters, displays, websites and social media (where appropriate permissions for image use have been obtained); analysing anonymised information; supporting coding and administrative tasks. Personally identifiable staff or pupil information must not be entered unless authorised and compliant with UK GDPR.
Microsoft Designer / Canva Magic Studio (Trust approved)	Teaching staff and Admin staff	Creating educational graphics, presentations, newsletters, displays and visual resources that do not contain personal or sensitive information.
Google Gemini (if approved by the Trust)	Authorised staff	Research, drafting documents, lesson planning, idea generation and administrative support, subject to the same data protection requirements as all approved AI tools.

Conditions of Use

The use of all approved AI tools is subject to the following conditions:

- Staff remain professionally responsible for all AI-generated content.
- AI-generated content must always be reviewed, edited and fact-checked before use.
- Personally identifiable or sensitive information relating to pupils, parents/carers or staff must not be entered into AI systems unless expressly authorised and compliant with UK GDPR.
- AI must not be used to make safeguarding, behaviour, SEND or personnel decisions without human oversight.
- AI must not replace professional judgement.
- Staff must only access AI tools using Trust-approved accounts where available.
- New AI tools must be approved by the Executive Leadership Team before use.

- This appendix will be reviewed regularly to reflect developments in AI technology and changes to approved software.
- AI-generated images or edited photographs must only be created from images that the Trust has permission to use. Staff must ensure that image permissions and parental consent remain in place before publishing AI-generated or AI-edited images on websites, newsletters or social media. AI must not be used to create misleading images or manipulate photographs in a way that misrepresents events or individuals.