Artificial Intelligence (AI) and Generative AI Policy
FOR THE FIRST FEDERATION TRUST

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1. Introduction and Purpose

The First Federation Trust recognises that Artificial Intelligence (AI), including generative AI technologies, is an increasingly integral part of education and wider society. AI presents significant opportunities to enhance teaching and learning, improve operational efficiency, and support staff in managing workload, while also preparing pupils for a future influenced by emerging technologies.

The Trust also recognises that AI introduces risks, particularly in relation to safeguarding, data protection, bias, and the potential for misuse. This policy provides a clear framework to ensure that AI is used responsibly, safely, and effectively across all Trust schools.

The Trust is committed to ensuring that the use of AI aligns with its values and supports a culture of safety, inclusion, accountability, and educational excellence.

Operational implementation, including training and curriculum development, will be supported through separate Trust guidance and strategy documents.

2. Scope

This policy applies to all individuals working within or on behalf of The First Federation Trust, including employees, leadership teams, trustees, volunteers, contractors, and pupils.

All users are expected to read, understand, and comply with this policy prior to using any AI technologies.

3. Definitions

For the purposes of this policy, the following definitions apply:

Artificial Intelligence (AI) refers to computer systems or technologies that are designed to perform tasks which would normally require human intelligence. This includes, but is not limited to, analysing data, recognising patterns, making predictions, and supporting decision-making processes.

Generative Artificial Intelligence (Generative AI) is a subset of artificial intelligence that can create new content, such as text, images, audio, video, or code, based on patterns learned from large datasets. Examples of generative AI tools include Microsoft Copilot and other AI-powered content generation platforms. Generative

AI tools present additional risks relating to accuracy, bias, intellectual property, and data protection, and therefore require careful oversight and responsible use.

4. Principles of AI Use

The Trust's approach to AI is underpinned by a commitment to responsible, ethical, and secure use. AI will be used to support, but never replace, the professional judgement of staff. Decisions affecting pupils, staff, or stakeholders will always remain under human control.

AI must not be used as the sole basis for decisions relating to pupils, staff, safeguarding, wellbeing, employment, performance management, or educational outcomes.

Safeguarding is paramount. AI technologies must not be used in a way that exposes pupils or staff to harm, including harmful content, impersonation, exploitation, or manipulation. The Trust recognises the emerging risks associated with AI, such as deepfake content, and will respond to these proactively.

All use of AI must be transparent where appropriate, and outputs must be critically evaluated for accuracy, bias, and reliability. The Trust acknowledges that AI systems may reflect bias within the data on which they are trained and is committed to mitigating any unfair or discriminatory outcomes.

The Trust will ensure full compliance with data protection legislation, and all AI use must safeguard personal and sensitive information in line with UK GDPR requirements.

5. Use of AI by Staff

Staff are encouraged to use approved AI tools to support their professional responsibilities, including teaching, planning, communication, administration, and analysis. When used appropriately, AI can improve efficiency, consistency, and outcomes.

However, staff retain full professional responsibility for any work produced with the support of AI. All outputs must be reviewed and adapted to ensure accuracy, appropriateness, and alignment with the Trust's standards.

Only AI tools approved by the Trust may be used for work purposes. Staff must not input personal, confidential, or commercially sensitive information into unapproved

or open AI systems. Where AI has been used to inform work, staff should ensure appropriate transparency.

All AI tools used for Trust use must be reviewed and approved through the Trust's procurement, information security and data protection processes prior to use.

AI must be seen as a tool to enhance professional practice rather than replace expertise, knowledge, or judgement.

6. Use of AI by Pupils

The Trust is committed to supporting pupils in developing an understanding of Artificial Intelligence (AI) and its role in society. However, due to safeguarding, data protection, and age-related considerations, the use of AI by primary-aged pupils will be restricted and carefully managed.

Pupil use of AI tools will only be permitted where the Trust is satisfied that appropriate filtering, monitoring and safeguarding systems are in place and meet current Department for Education (DfE) and Keeping Children Safe in Education (KCSIE) requirements. Where these safeguards are not in place, pupils will not be permitted to access AI tools.

Where permitted, pupils may only use Trust-approved AI tools under staff supervision and for clearly defined educational purposes.

Pupils must not input personal, sensitive or identifiable information into AI tools, including names, images, audio or information about themselves or others.

Pupils will be taught, in an age-appropriate way, about the safe and responsible use of AI, including its limitations and risks.

Pupils must not present AI-generated content as their own work. Any misuse of AI, including plagiarism or the creation of harmful or inappropriate content, will be addressed in line with Trust behaviour and safeguarding policies.

Staff are responsible for supervising and monitoring pupil use of AI and ensuring such use remains compliant with this policy and any associated Trust guidance.

7. Safeguarding and Ethical Use

Safeguarding is central to all aspects of AI use within the Trust. AI must not be used to produce, access, or share harmful, abusive, or inappropriate content.

Staff must remain vigilant to the risks associated with AI misuse, including bullying, impersonation, misinformation, and manipulation. Any safeguarding concerns must be reported immediately to the Designated Safeguarding Lead in line with established procedures.

Any misuse of AI by pupils, staff, volunteers, contractors, or other users will be addressed in accordance with the Trust's Acceptable Use Policy, Behaviour Policy, Staff Code of Conduct, safeguarding procedures, and disciplinary processes, as appropriate.

Staff who become aware of any actual or suspected use of AI that breaches this policy, compromises data protection requirements, creates safeguarding concerns, or presents a risk to the Trust must report their concerns through the appropriate management, safeguarding, data protection, information security, or whistleblowing procedures.

AI systems must be used with a clear understanding of their limitations. Outputs may be inaccurate, misleading, biased, or outdated and must always be subject to appropriate human review and professional judgement before being relied upon or shared.

8. Intellectual Property

All materials created by staff using AI tools in the course of their employment remain the property of the Trust. Staff must ensure that AI-generated content does not infringe third-party intellectual property rights and must review outputs for originality and appropriateness before use.

Where AI is used to support pupil work, pupils must not present AI-generated content as their own and must adhere to the Trust's expectations regarding academic integrity.

9. Data Protection and Security

The Trust is committed to ensuring that all AI use complies with the UK General Data Protection Regulation and the Data Protection Act 2018.

Staff must not upload images, video or audio recordings of pupils or staff into generative AI tools, including any content that could identify individuals, unless explicitly approved through a Data Protection Impact Assessment (DPIA).

The Trust's Data Protection Officer service is provided by **Data Protection Education**, who will advise on compliance, risk, and the completion of Data Protection Impact Assessments (DPIAs) where required.

AI tools must not be used to process personal or sensitive data unless explicitly approved and subject to appropriate safeguards. Where AI systems are used to process organisational, personal or sensitive data, the Trust will assess the supplier's data handling arrangements, including whether data entered to the system may be retained, used for model training, service improvement, or shared with third parties. Where appropriate, the Trust will require contractual assurances that data provided by the Trust, its staff or pupils will not be used to train, refine or improve commercial, public or third-party AI models without explicit authorisation.

Where new AI solutions are introduced, a DPIA will be undertaken to assess risks and ensure compliance with data protection requirements.

The Trust will maintain appropriate cybersecurity measures to protect systems, including access controls, monitoring, and incident response procedures.

10. Roles and Responsibilities

The Board of Trustees holds overall responsibility for ensuring that Artificial Intelligence (AI) is used safely, ethically, and in alignment with the Trust's strategic objectives. The Board will oversee the implementation of this policy and ensure that appropriate governance and risk management arrangements are in place.

Headteachers are responsible for the day-to-day leadership and management of AI use within their schools. This includes ensuring that all staff understand and comply with this policy, that only approved AI tools are used in practice, and that staff are appropriately supported and trained to use AI safely and effectively. Headteachers are also responsible for ensuring that pupils are taught about the responsible and safe use of AI in line with Trust expectations. While aspects of this responsibility may be delegated, overall accountability remains with the Headteacher.

Senior leaders across the Trust are responsible for supporting the consistent implementation of this policy, ensuring that appropriate systems, processes, and professional development opportunities are in place to enable safe and effective AI use.

The Trust's Data Protection Officer, provided by **Data Protection Education**, is responsible for advising on all matters relating to data protection and AI

compliance, including overseeing the completion and review of Data Protection Impact Assessments (DPIAs) where required.

The Trust's **Head of IT & Procurement** is responsible for providing technical leadership in relation to AI. This includes overseeing the evaluation and approval of AI tools, ensuring that appropriate technical safeguards, filtering and monitoring systems are in place, and maintaining alignment with Trust data security requirements, Department for Education guidance, UK GDPR, the Data Protection Act 2018, cybersecurity best practice, and other applicable legal and regulatory requirements.

All staff are responsible for adhering to this policy in their professional practice, ensuring that AI tools are used appropriately and safely, and maintaining full professional accountability for any content or decisions supported by AI.

11. Monitoring and Review

The use of AI across the Trust will be monitored to ensure compliance with this policy and to assess its impact on teaching, learning, and operational effectiveness.

This policy will be reviewed annually, or more frequently in response to significant changes in technology, legislation, or guidance.

The Trust will maintain supporting AI standards, guidance, approved tool registers, and other operational documents to support the implementation of this policy. These documents may be reviewed and updated by the **Head of IT & Procurement**, in consultation with relevant stakeholders, including the Data Protection Officer and senior leaders, without requiring formal approval by the Board of Trustees, provided that any changes remain consistent with the principles and requirements set out in this policy.

Supporting guidance, standards, approved tool registers, and implementation resources relating to AI will be made available through the Trust intranet. Staff are responsible for familiarising themselves with these documents and complying with any requirements contained within them.

Any changes that materially alter the intent, scope, principles, or governance requirements of this policy will be subject to the Trust's normal policy approval process.

12. Approved AI Tools

Approved AI Tools
Microsoft Copilot 365
Google Gemini
GovernorHub AI assistant
Graduated response
Teachmate
Google Search AI Overview
Canva
Arbor AI