

AI Acceptable Use Policy

AI Acceptable Use Policy: document provenance

Approver	Trust board
Date of approval	Reviewed August 2026
Policy owner	Robyn Ellis
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Version	1
Date of next review	May 2027
Summary of changes in this review	• Updated according to KCSIE 2026 and DfE safety standards
Related policies and documents	• Approved Core Tooling and Copilot Guidance • Online acceptable use of IT



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1.0 Introduction

1.1 Purpose of the policy

This policy sets out how AI and data technologies will be used safely, ethically, legally and effectively across our trust. It ensures all users - students, teachers, leaders, governors, and administrators - understand their responsibilities and the principles guiding AI use in teaching, learning, administration, and safeguarding.

1.2 Scope of the policy

This policy applies to all AI and data systems used within our trust; all users including students, staff, volunteers, leaders, trustees, ambassadors, and contractors; all trust-related activities including teaching, learning, assessment, communications, administration, and safeguarding. It also covers measures to identify and prevent misuse such as misuse of AI-generated content, impersonation, misinformation, and identity fraud.

1.3 Policy statement

Our trust is committed to leveraging the benefits of AI and data technologies to enhance outcomes for students while upholding our ethical and legal responsibilities. We believe in the potential of these technologies to improve educational outcomes and streamline administrative processes. However, we also recognise the importance of using these technologies in a manner that respects privacy, promotes fairness, and prevents discrimination. This policy provides the framework for achieving these goals.

All users of generative AI must comply with relevant laws, regulations, policies, and guidelines, including but not limited to Keeping Children Safe in Education (KCSIE), UK GDPR, Equality Act 2010, intellectual property and copyright laws, JCQ guidelines, and data protection standards. Staff will prioritise safeguarding our students (as outlined in our trust safeguarding policy) and their online safety. Staff will not knowingly use any AI technology that puts students at greater risk. Staff will not provide intellectual property, including students' work, to train generative AI models without appropriate written consent or lawful exemptions in place.

Any AI-related concern which may indicate a safeguarding, online safety, data protection, cyber security or professional conduct risk must be reported through the relevant trust process without delay.

2.0 Definitions

We define key terms related to AI and data use in education to ensure a clear understanding of this agreement. These definitions are based on the "Ethical Guidelines on the Use of Artificial Intelligence (AI) and Data in Teaching and Learning for Educators" document published by the European Commission in September 2022.

2.1 Artificial intelligence (AI)

AI refers to systems that display intelligent behaviour by analysing their environment and taking action to achieve specific goals. In education, AI can assess progress, personalise learning, and analyse educational data.

2.2 Data

In this agreement, 'data' refers to information collected about students' learning and behaviour in the educational environment. This includes grades, attendance, online activity, and other relevant information.

2.3 Ethical use

Ethical use involves utilising AI and data in ways that respect individual rights, promote fairness, and prevent discrimination. This includes transparent practices, accountability, and respect for privacy.

2.4 Privacy and data governance

This refers to the practices and procedures in place to protect individuals' privacy and ensure the secure and ethical handling of personal data.

2.5 Technical robustness and safety

This pertains to the reliability and safety of AI systems. It involves ensuring that these systems function correctly, are secure from cyber threats, and do not cause harm to users or the educational environment.

2.6 Human agency and oversight

This highlights the necessity for human involvement in the use of AI systems. It ensures that decisions made by AI can be understood and overseen by humans, with mechanisms in place for human intervention when necessary.

2.7 Societal and environmental wellbeing

This considers the impact of AI and data use on society and the environment. It involves assessing the broader implications of these technologies, including their potential effects on social interactions, well-being, and the environment.



3.0 Core principles

3.1 We are committed to responsibly using AI in our academies, ensuring it enhances education and the effective running of our trust, while upholding ethical standards. Our core principles are created in alignment with the “Ethical Guidelines on the Use of Artificial Intelligence (AI) and Data in Teaching and Learning for Educators” document.

Our use of AI and digital tools will be:

Safe and ethical

- rooted in safeguarding and supportive of students, staff and our wider community
- actively addressing bias and promoting inclusivity: we believe AI should reduce, not increase, inequality
- transparent, ensuring students, staff and families understand how digital tools and AI are used and how they impact education
- sustainably designed, aiming to reduce or eradicate environmental harm from our supply chain

Secure

- fully compliant with UK GDPR, the Data Protection Act and our trust’s filtering and monitoring requirements
- clear that personal data belongs to our stakeholders
- governed by defined boundaries for use and strong accountability for purpose and outcomes
- technically robust

Smart

- protective of intellectual endeavour: ensuring thinking, processing, decision making, discussion and professional judgement are applied by the person using the tool
- used only where it adds genuine value in delivering high quality, high impact positive change in support of our mission
- deliberate, evaluated and impactful in practice
- aligned with our curriculum and philosophies, enhancing learning experiences and supporting student outcomes without replacing human interaction

Supported

- backed by appropriate training, guidance and ongoing development
- strengthened through critical thinking and reflective practice

Supervised

- always overseen by a human-in-the-loop with relevant expertise
- designed to support teachers, not replace them
- aware that the technology is rapidly evolving and will be committed to adapting ways of working, as necessary

4.0 Safe and ethical: use of AI and data

4.0 Commitment to ethical use

In our use of AI, we will:

- respect privacy, fairness and non-discrimination
- be transparent in how AI systems work, how data is collected, and how decisions are made. Users will be transparent about their use of AI technology so that stakeholders understand where and how AI is used.
- provide training for all staff and education for students on ethical AI and data privacy
- comply with applicable laws, regulations, policies, and guidelines including those relating to intellectual property, copyright, data protection, safeguarding, and formal assessment
- remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used and should rely on their expertise to ensure that they review and tailor any AI output

5.0 Safe and ethical: societal and environmental wellbeing

5.1 Commitment to promoting societal and environmental wellbeing

In our use of AI, we will:



- ensure AI use benefits individuals and society, supporting social and emotional wellbeing
- involve students and families in decisions where appropriate and consider their wellbeing
- minimise environmental impact by considering energy use and sustainability

6.0 Secure: technical robustness and safety

6.1 Commitment to technical robustness and safety

Our trust is committed to using technically robust and safe AI and data technologies. We understand that the reliability and safety of these technologies are crucial for their effective and ethical use in our educational environment.

We have put in place several measures to ensure the technical robustness and safety of the AI systems we use:

- Security measures: sufficient security to protect against data breaches, including physical and digital security measures to protect data from unauthorised access, use, disclosure, alteration, or destruction.
- Monitoring and testing: for every use case we have a process to assess whether the AI system is meeting the goals, purposes, and intended applications. This includes regular reviews of AI systems' performance and outcomes and audits of data collection, use, and protection practices.
- Oversight mechanisms: appropriate oversight mechanisms for data collection, storage, processing, minimisation, and use. This includes procedures for responding to any technical issues or incidents in a timely and effective manner.
- AI systems, tools and integrations must be approved through our trust's tooling triage process before use. This process will consider safeguarding, data protection, cyber security, educational purpose, age appropriateness, accessibility, supplier assurances, moderation and safety controls, and alignment with DfE digital, technology and generative AI product safety standards.
- Where AI functionality is embedded within approved platforms, our trust will ensure proportionate oversight so that new features, default settings, data sharing arrangements and safety controls are reviewed before they are enabled for staff or students.

7.0 Secure: privacy and data governance

7.1 Commitment to privacy and data governance

Our trust is committed to protecting the privacy of our students, staff and community. We understand the importance of data governance in ensuring the ethical use of AI and data technologies. We adhere to all relevant laws and regulations regarding data protection and privacy, including the UK General Data Protection Regulation (UK GDPR).

In brief, our trust will

- collect only necessary data and protect data using technical and organisational measures
- restrict access appropriately and share data only when lawful and essential
- ensure individuals understand how their data is used, their rights under UK GDPR and how they can flag any issues
- provide options for individuals to manage their data preferences
- Users will be aware that any information entered into some AI models may no longer be private or secure. Users must not enter any information containing personal data, intellectual property or private information, including confidential information such as contracts, into any AI model without checking whether it is permitted to do so. The trust will maintain an approved tooling list or annex confirming which AI tools, if any, are approved for use with personal data.
- adhere to the data protection policy and data protection impact assessment procedure (DPIA) by raising a ticket on TOPdesk and following the process outlined. Users should be aware that it is not always easy to recognise when AI tools are processing personal data and they should not presume that no processing is taking place.
- Before any AI tool is used to process personal data, special category data, safeguarding information, student work, staff information, assessment data or commercially sensitive information, staff must check that the tool is approved for that purpose and that any required DPIA, supplier assessment or information governance review has been completed.

7.2 Data protection

We have implemented measures to protect data from unauthorised access, use, disclosure, alteration, or destruction. This includes technical measures such as encryption and access controls and organisational measures such as staff training and policies.



8.0 Smart: AI and data use in education

8.1 Explanation of AI and data use in our trust setting

AI and data technologies are used in various ways in our trust to support teaching, learning, and administrative processes. For instance, our trust necessarily processes substantial amounts of educational data, including personal information about students, families, staff, management, and suppliers.

This data is used for various purposes such as resource and course planning.

Students who interact with digital devices generate digital traces such as mouse clicks, data on opened pages, the timing of interaction events, or key presses. This type of trace data is often used for learning analytics.

8.2 Examples of AI and data use in education

Here are some examples of how AI and data technologies can be used in our trust. All must be approved by the AI tool triage process before launch. More information on this can be found in the approved tooling at Dixons annex:

- Intelligent tutoring systems: These systems provide individualised instruction or feedback to students without requiring teacher intervention in the moment. They follow a step-by-step sequence of tasks.
- Dialogue-based tutoring systems: These systems also follow a step-by-step sequence of tasks but through conversation in natural language. More advanced systems can automatically adapt to the level of engagement to keep the learner motivated and on task.
- Language learning applications: AI-based learning apps are used in formal and nonformal education contexts. They support learning by providing access to language courses and dictionaries and providing real-time automated feedback on pronunciation, comprehension, and fluency.
- Managing student enrolment and resource planning: AI systems are used to predict and better organise the number of students who will attend in the coming year and assist with forward planning, resource allocation, class allocations, and budgeting.
- Using chatbots for administrative tasks: A chatbot virtual assistant on our trust's website guides students and parents through administrative tasks such as admissions, paying for activities and food or logging technical support issues.

9.0 Supervised: user responsibilities

All users must:

- use AI ethically, legally and in line with trust policies
- monitor AI outputs for fairness and accuracy, including regularly reviewing results produced by AI to ensure they are fair and accurate
- protect privacy and intellectual property
- report concerns about misuse, inaccuracy or harm
- report immediately to the DSL any AI-generated or AI-facilitated content or behaviour that may indicate online harm, including deepfakes, impersonation, AI-generated intimate or abusive imagery, nudification, grooming, harassment, misinformation, disinformation, extremist material, self-harm content, phishing or other cyber risk
- follow safeguarding, data protection and confidentiality requirements

10.0 Human oversight

Our trust recognises the importance of human agency and oversight in using AI. AI should be used to support, not replace, human decision-making. Individuals should also be able to understand and control how AI and data technologies affect them.

As a trust, we must ensure that:

- AI supports, not replaces, human decision-making
- all AI outputs are subject to human review
- transparency and training ensure users understand and control AI's impact

Users will not rely on AI to replace strategic decision making or rely on it without human oversight, to make decisions that could have a significant impact on people. The human is accountable for the final decision.



11.0 Supervised: student use of AI

11.1 General student usage

In an academy or college setting, students may use academy-approved AI tools where this has been permitted by the task, teacher or academy guidance. AI use must follow the principles below. There are situations and contexts within our trust where students will be asked to use AI tools to enhance their learning and to explore and understand how these tools can be used.

Conversely, there are situations in which the use of AI is forbidden, and the tasks will be framed to prohibit / avoid using AI tools, such as working offline or under supervised conditions.

In general, students must understand the following principles:

- AI tools used in academic work must not be used for cheating, plagiarism, or unethical behaviour.
- AI tools must not be used to impersonate individuals or organisations in a misleading or malicious manner or to generate unlawful, harmful or offensive content of any type.
- Students must not use AI tools to create, request, edit, share or circulate deepfakes, sexualised or intimate imagery, nudified images, abusive material, hateful content, extremist content, threats, harassment, bullying content, misinformation, disinformation, phishing attempts or any other content that could cause harm to themselves, another person or the wider community.
- The use of AI tools and data / content created using such tools must comply with the anti-bullying policy, positive behaviour policy and acceptable use agreement.
- AI-generated content should not be considered a substitute for student effort or original work.
- Students must not submit or otherwise publicise academy or trust materials using AI tools. Such materials include, but are not limited to, past papers, textbooks, worksheets, curriculum materials, pastoral information and other academy or trust materials.
- It is the responsibility of students to verify the accuracy of information received from any AI sources (including search engines) used.
- Students must always clearly credit / acknowledge the use of known AI technology in their work.
- Students should be aware that some AI tools run in the background of certain software and programs, potentially without their awareness. Students must also be mindful of the rights of any third parties and avoid infringing those rights, for example, by using trademarks or other content. Students should trace sources used by AI tools to generate the response where possible (and students should be encouraged to do so accordingly).
- Any use of AI in work submitted for external qualification must be strictly in line with the guidance for that qualification. Failure to follow that guidance provided by the teacher, delivered in line with expectations from the awarding body, could potentially lead to disqualification from that unit, qualification or all qualifications with that exam board.
- Students must maintain confidentiality in their interactions with AI tools and must not disclose any confidential or personal information about themselves or others to the AI model, as this information may then be in the public domain and accessible to others.
- Additionally, students should not use AI tools for advice on emotionally or socially complex problems or other sensitive issues, for example medical diagnoses or wellbeing concerns. Students should contact their pastoral lead or form tutor for support.
- Students who breach this policy may face disciplinary action by their academy.

12.0 Supervised: staff use of AI

In some situations, staff may find it helpful to use AI but the following principles must be complied with:

- All uses must be transparent and honest – staff must not pass off AI-generated work as their own but acknowledge to colleagues and students alike the extent of AI assistance, and where possible give the sources that the AI model used, just as students are asked to do.
- AI tools must not be used to impersonate individuals or organisations, in a misleading or malicious manner, or to generate unlawful, harmful, or offensive content.
- Staff must be alert to AI-related safeguarding and online safety risks, including AI chatbots, deepfakes, voice cloning, impersonation, nudification apps, AI-generated intimate imagery, grooming, misinformation, disinformation, cyberbullying, extremism, self-harm content, phishing and scams. Any concern must be recorded and escalated in line with safeguarding, online safety, cyber security or data protection procedures as appropriate.



- Use of AI tools and data / content created using such tools must comply with the staff code of conduct, the IT acceptable use agreement, the AI core principles, the approved tooling list and any other related policies.
- AI supported drafts must be meaningfully reviewed by the staff member. If they do not have relevant expertise on the subject matter, then the relevant expert within Dixons must be sought before using that work.
- AI must not be used to mark or help assess students' work without being transparent to the student(s) concerned on each occasion and to the head of department or line manager.
- Staff must use appropriate discretion and due diligence to assess whether information obtained from generative AI tools infringes upon any third-party rights (for example, branding, logos, or third-party academic output) and refrain from using such material. Our trust will not be responsible for any infringing use.
- Staff must only use approved AI models, as listed in the approved tooling list. Staff must not enter any personal or professional information about themselves, their academy, other staff members, students or their families into any non-approved tools.
- When using an approved tool, any information shared must be necessary for the task and non-identifiable. For example, initials or numbers should be used in place of names. Staff must not enter information beyond what is strictly necessary for the task, for example by removing unnecessary data from a spreadsheet before asking Copilot to support analysis.
- Staff must not use generative AI tools to attempt to resolve emotionally or socially complex problems or other sensitive issues, for example medical diagnoses or wellbeing concerns.
- Information about the location of our academies, events or trips, or any information that makes the academy, trust or any individual identifiable, must not be entered into a search engine or AI tool, including when drafting risk assessments.
- Staff must not input proprietary or confidential information belonging to the academy, trust, other members of staff or students into AI tools. Aside from personal information, this includes, but is not limited to, financial materials, images of the academy or trust, academy or trust materials, academic materials, other intellectual property or commercial information.
- Staff must not use AI tools to make student or other workplace-related decisions that could have significant educational, legal, social or other similar effects (for example, disciplinary, academic assessment, or employment-related decisions).
- Staff must be aware of generative AI tools' potential biases and inaccuracies and inform students about these risks.
- Staff should familiarise themselves with the guidelines about AI use and the potential of AI tools since even if an individual does not use it, our students will.
- Staff have a responsibility to ensure that, where AI is used, it is used sensibly and appropriately and that they have read the JCQ guidelines in full.

Review and updates

This policy will be reviewed at least annually or as often as necessary to address changes in laws or practices related to AI and data use. Updates will be communicated to all users in a timely manner.

