

Primary Learning Trust (PLT)

...where everyone flourishes!



Artificial Intelligence (AI) Policy

Primary Learning Trust
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Mission: to educate all our primary children for life, inspired by expert professionals, in a place *where everyone flourishes!*

Vision

- A family of schools, proud to be working together as one entity, in the right conditions for deep and purposeful **collaboration**
- To **belong** to a great place to learn, work and grow.
- To improve and sustain high educational standards across the Trust, through **evidence-informed** practice.
- To continuously improve teaching and learning, ensuring that every pupil has the best possible education.
- To hold trust on behalf of our children, achieving the best for and from our people, so that everyone can **flourish**.
- To empower our children and our people to create a better future.
- To advance the education system, as part of our civic duty, for the wider public benefit

Values

- **Belonging:** where all our people feel connected, valued, trusted and fulfilled, with a shared purpose to achieve excellence, in a place of psychological safety.
- **Flourishing:** where all our people thrive and continue to grow through the development of their intellectual potential and live well, building strong relationships as well-rounded human beings.
- **Collaboration:** by design, to ensure that all our people are supported and openly share ideas and practice; that no school - no child - is left behind, building together the pipeline that develops the next generation of leaders, global citizens, influencers and innovators.
- **Evidence-informed:** conceptual models of quality and improvement that can be shared and embedded. Deliberate and intentional knowledge-building to create expertise through cultures and communities of improvement, using the active ingredients of professional development.

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1. Aims and Scope

Here at Primary Learning Trust, we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can enhance pedagogical methods, customise learning experiences through adaptive teaching, enhance accessibility for inclusion and progress educational innovation.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical and bias complications, safeguarding and compliance with broader legal obligations.

Therefore, this policy establishes guidelines for the ethical, secure and responsible use of AI technologies across our trust community.

This policy covers the use of AI tools by trust staff, trustees, local governors, and pupils. This includes generative chatbots such as ChatGPT, KeyGPT, NotebookLM, Canva, Grammarly, Napkin AI, Arbor and Google Gemini (please note that 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
- Protect the privacy and personal data of all staff across the trust, trustees, local governors and pupils in compliance with the UK GDPR
- Narrow the digital divide for all stakeholders with equitable AI access.

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

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 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

As a trust, we follow the 5 principles set out in the [AI regulation white paper](#).

Regulatory principle	We will:
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 Board of Trustees and 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
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4. Roles and responsibilities

4.1 Board of Trustees

The Board of Trustees will:

- Take overall responsibility for monitoring this policy and holding 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 school leaders are appropriately supported to make informed decisions regarding the 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 also completing the DPIA ([Data Protection Impact Assessment](#)) if needed.

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

Use only approved AI tools (see section 5)

- Seek advice from the Data Protection Officer as appropriate
- 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

4.2 Head Teacher/ Head of School

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 following data protection legislation
- Ensure that all staff follows the guidance set out in this policy
- 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

4.3 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. Completing the DPIA

Our Trust DPO is Naylah Khan and is contactable via n.khan@primarylearningtrust.com

4.4 Safeguarding Leads

Safeguarding Leads in each school 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 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 using approved AI tools. Any use of AI must follow the guidelines set out in this policy and the [Effective Use of AI](#).

To protect data when using generative AI tools, staff must:

- Seek advice from the Data Protection Officer and IT Lead, as appropriate
- 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 pupils understand the potential benefits and risks of using AI in their learning. Our staff are responsible for guiding 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')

5. Use of AI by staff across the trust, trustees and local governors

5.1 Approved use of AI

At Primary Learning Trust, 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 they cannot replace the judgement and knowledge of a human expert.

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.

The table below sets out the approved AI tools and the approved uses for each tool. Reference to be made to the 'LIVE AI Tools List', which will be approved by Trustees, as needed due to the rapidly evolving climate of AI.

Open-source AI tools / open AI tools, meaning tools which anyone can access and modify, should only be used for tasks that don't require personal information to be input.

Approved tools	Approved uses
KeyGPT	• Letter to parents/carers • Job descriptions and adverts • Interview Questions • Policy templates • Summarise issues • Brainstorm ideas • Generate documents
ChatGPT	• Image creation • Generate documents • Lesson Planning • Resource creating

	• Summarise documents and policies • Draft emails • Writing support • Parent engagement and communication • Executive summary reports • Adaptive and inclusive teaching lessons and resources
NotebookLM	• Access to policies • PD/research assistance • Comparing reports
Napkin AI	• Creating chart visuals using anonymised data
Canva	• Lesson planning • Resource creation • Image generation • Image editing • Modelling AI to Pupils
Gemini (Google)	• Assessment & feedback • Image creation • Generate documents • Lesson Planning • Resource creating • Summarise documents and policies • Draft emails • Writing support • Parent engagement and communication • Executive summary reports • Adaptive and inclusive teaching lessons and resources • Upload documents from Google
Arbor	• Troubleshoot • Reducing workload in finding information • Communication where appropriate
Grammarly	• Improving content • Accessibility tool

5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their Head Teacher/Head of School to discuss any ideas they

may have with regards to using AI, so they can take the suggestions forward if they deem it to be a satisfactory new method of working.

The CEO is responsible for signing off on approved uses of AI, or new AI tools, considering advice from the DPO.

5.3 Data protection and privacy

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Primary Learning Trust 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 10 of this policy.

5.4 Intellectual property

Most generative AI tools use user input to train and refine their models.

Pupils own the intellectual property (IP) rights to the original content they create. This is likely to include anything that shows working out or is beyond multiple-choice questions.

Primary Learning Trust 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.

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

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.

Primary Learning Trust 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 potential biases.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, we will deal with them through our usual complaints procedure.

5.6 Raising concerns

We encourage staff to speak to their school leader first if they have any concerns about the potential 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

Primary Learning Trust will always:

- Use generative AI tools ethically and responsibly
- Remember the principles 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 Primary Learning Trust, 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 and have the ability to question generative AI.

There are no approved AI tools for children of primary age. Only Canva is to be used to model AI as a generative tool for children. Children will be exposed to the benefits and risks of AI, including limitations, reliability and potential bias.

Online Safety: Protecting Against Harmful or Misleading Content

We ensure that all pupils receive age-appropriate education on:

- **Recognising misinformation and fake news**, including how AI can manipulate images, videos, and text.
- The importance of **privacy, data protection, and responsible online behaviour**.
- Identifying and avoiding **AI-generated scams, phishing attempts, and deepfakes**.
- Understanding **digital footprints** and the long-term impact of online actions.

This is taught through the E-Safety Curriculum.

7. Use of AI by staff with pupils

At the Primary Learning Trust, we recognise the potential of Artificial Intelligence (AI) in enhancing learning experiences for our pupils. We are committed to ensuring that AI is used **safely, ethically, and effectively** to support children's education, and therefore, they do not have access to AI tools; instead, teachers may use the AI tools within Canva to model and provoke discussion.

7.2 Our approach ensures that AI is used **thoughtfully and purposefully**, with clear guidance from teachers, to enhance learning without replacing fundamental skills such as critical thinking, creativity, and problem-solving.

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs.

Where AI tools have been used as a source of information, staff should be open and transparent about using the AI, however not stating the specific name of the tool.

8. Assessments

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

9. Staff, Trustee and Governor training

At the Primary Learning Trust (PLT), we recognise the growing impact of Artificial Intelligence (AI) on education. We are committed to equipping our staff, Trustees and Governors with the knowledge and skills needed to integrate AI effectively and ethically into teaching and learning and within their roles. Our approach is built on three key principles: **understanding, professional development, and collaboration.**

9.1 Ensuring a good understanding of AI so that all staff have a clear and confident understanding of AI, we will:

- Provide regular training sessions on the fundamentals of AI, its applications in education, and ethical considerations. Include this in the Induction programme for anyone new to the Trust.
- Develop guidance documents showcasing how AI can enhance teaching, assessment, and workload reduction.
- Encourage self-directed learning through access to high-quality online courses and reading materials.
- Offer hands-on workshops where staff can explore AI tools relevant to their roles, ensuring practical application in classrooms.

9.2 CPD opportunities and responsibility for AI development to ensure that AI professional development is ongoing and embedded into our Trust-wide CPD strategy:

- AI learning will be integrated into existing CPD frameworks, ensuring that AI is not seen as an 'add-on' but a tool to support effective teaching and leadership.
- Dedicated AI Champions within each school will act as contact points for sharing best practices and supporting colleagues in implementation.
- Staff will have access to external CPD opportunities, including courses from educational technology providers, research organisations, and national AI in education networks.

9.3 Staying abreast of good practice and sharing knowledge to ensure we remain at the forefront of AI advancements in education, we will:

- Engage with national and international research bodies, including the Education Endowment Foundation (EEF) and AI in Education networks.
- Participate in cross-school collaboration, enabling staff to share successes and challenges in AI adoption.
- Host AI innovation meetings, where staff can showcase how AI is enhancing teaching, learning, and efficiency within our schools.
- Encourage peer coaching and lesson observations, ensuring best practice is embedded across all classrooms.

By embedding AI awareness and CPD into our Trust-wide strategy, we aim to empower our staff with the tools and confidence to use AI effectively, ultimately enhancing teaching, learning, and school operations across the Primary Learning Trust.

10. Breach of this policy

10.1 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.

10.2 By trustees or local governors

Trustees or local governors who breach this policy will follow the procedures set out in the Trustee/ Governor Code of Conduct.

10.3 By pupils

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

11. Monitoring and transparency

AI technology and its benefits, risks and harms evolve and change rapidly. Consequently, this policy is a live document that must be kept updated by the CEO 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 regulation changes.

The policy will be shared with the Board of Trustees at least annually.

All staff, trustees and governors are expected to read and follow this policy. The Head Teacher/ Head of School is responsible for ensuring that the policy is followed in their school.

CEO and DPO will monitor the effectiveness of AI usage across the trust.

We will ensure we keep members of the trust community up to date on using 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 across the schools in our trust.

12. Links with other policies

This AI policy is linked to our:

- Data Protection Policy
- Behaviour Policy
- Staff Code of Conduct
- Acceptable Use Policy