

Artificial Intelligence Policy

1 Introduction

1.1 Summary

This policy outlines the Heart of Mercia Multi Academy Trust's (HoM) approach to the use of artificial intelligence (AI) within its academies and applies to all AI technologies and generative AI tools used within the Trust's educational and administrative processes.

The Trust recognises that recent AI developments bring huge opportunities and at the same time risks around privacy, bias and accountability that must be managed appropriately.

The Trust will take a risk-based approach to AI. New uses of AI and new AI tools will be assessed and the risks to the rights and freedoms of individuals and groups will be considered. Appropriate and proportionate technical and organisation measures will be implemented to mitigate risks in relation to any approved use of AI within the Trust.

This policy reflects advice from [Ofsted in what they expect from providers in relation to their use of AI](#), [information from the ICO](#) and the [government AI regulation white paper](#).

1.2 Definitions

Artificial Intelligence (AI) – is a branch of computer science that aims to create systems capable of performing tasks that would normally require human intelligence. These tasks include learning from experience, understanding natural language, recognising patterns, solving problems and making decisions.

Machine Learning (ML) - a subfield of AI focused on using data and algorithms that give the system the ability to 'learn' from data, gradually improving its accuracy. The goal of ML is to derive an algorithm for the solution of a task without being given explicit instruction. The terms AI and ML are often used interchangeably even though they are conceptually different.

Generative Pre-trained Transformers (GPT) – a type of large language model (LLM) and used by well-known AI products such as Copilot and ChatGPT. These products use a GPT to produce content in response to prompts which the user inputs.

1.3 Audience

This policy applies to all staff, Trustees, Members and Governors within the Heart of Mercia Trust, including its academies.

2 Aims & Objectives

2.1 Aims

The aim of this policy is to ensure that AI technologies are used in a way that is ethical,

Policy document

responsible, and beneficial to the educational experiences of our learners or administrative processes of the Trust and its academies.

2.2 Objectives

The Trust aims to embrace AI in a safe, controlled way. This policy aims to enable use of AI in a way that promotes:

- **Educational Enhancement:** our AI policy aims to enhance educational experiences by enabling academies of the Trust to leverage emerging AI technology.
- **Business Value:** we strive to maximize business value through AI by optimizing processes and automating some administrative tasks.
- **Ethical Compliance:** our AI policy prioritises ethical considerations, ensuring transparency, fairness, and accountability in decisions which may involve information gleaned from the use of AI.
- **Data Privacy and Security:** we take steps to protect student and staff data and ensure any use of AI involving personal or commercially sensitive data is approved before use.
- **Innovation:** our AI policy facilitates experimentation and promotes the Trust-wide adoption of promising AI technologies to drive innovation in education.

3 Principles in the use of AI

3.1 Safety, security and robustness

The Trust has a responsibility to ensure that AI solutions are secure and safe for users and protect users' data. Users must never input personal or commercially sensitive data to any AI tool that hasn't been approved by the Trust. Approved tools have had data protection/GDPR, and cyber security compliance reviewed by the Trust and are deemed to have adequate safeguards in place to protect users' data.

The use of AI should respect the rights of learners, staff and other stakeholders. Users of these tools need to be adept at reviewing data quality and be able to identify any bias or errors.

Decisions concerning safety and security are made in line with the other relevant Trust policies (detailed below) and academy policies as appropriate.

3.2 Appropriate transparency and explainability

Trust and Academy staff should be transparent in their use of AI and highlight where and how AI has been used. This may include information incorporated into privacy notices and/or declarations stating the use of AI at appropriate points within the system.

Any use of AI to either help make or inform decisions impacting learners, staff or other stakeholders must be explainable, and "human in the loop" solutions should be implemented in any AI use in this situation. Staff need to be able to critically review any AI recommendations and all use of AI must have human oversight and not involve any automated decision making.

3.3 Fairness

The Trust and its academies must only allow the use of AI that is ethically appropriate. Potential bias relating to small groups and the protected characteristics established by the Equality Act 2010 should be considered as part of the due diligence process before any new use of AI is approved.

The Trust should work proactively with suppliers to help them correct any problems relating to bias or error.

3.4 Accountability and governance

The Trust is ultimately responsible for monitoring and evaluating the use of AI within the organisation. However, all staff, Trustees, Members and Governors have a responsibility for adhering to the principles set out in Section 3.

Trust approval must be sought for any uses of AI involving any personal or commercially sensitive data.

Use of AI for automated decision making which affects individuals or groups of people is prohibited.

AI not requiring Trust approval should still be discussed with academy leaders prior to use.

Responsibility	Role(s) accountable
Responsible for reviewing and approving new AI tools that involve personal or commercially sensitive data	Chief Information Officer, Chief Data Officer & Data Protection Officer
Responsible for advising Academy staff on what approved AI tools are available	IT Hub Manager / Academy Leaders
Responsible for monitoring and evaluating the use of AI	Academy Leaders Chief Information Officer / IT Hub Managers

3.5 Contestability and redress

The Trust should ensure users of AI receive appropriate training covering the underpinning knowledge alongside benefits and pitfalls.

Complaints about the use of AI will be dealt with by the HoM Complaints Policy or academy complaints policy if raised by an external party e.g. students/parents. Any concerns regarding the use of AI from Trust or academy staff should initially be raised with your line manager or appropriate senior leader.

4 Approval procedure and training requirements for use of new AI tools

4.1 Use of AI tools involving any personal or commercially sensitive data

Data protection/GDPR legislation applies in any context involving personal data. AI tools that the Trust or its academies wish to pilot or use that involve any personal or commercially sensitive data must be approved by the Trust prior to use. Please email the details of your request to information.assurance@heartofmerciamulti-academy-trust.org.uk.

4.2 Training requirements for use of approved AI tools involving any personal or commercially sensitive data

All users of AI tools involving any personal or commercially sensitive data are expected to receive training ahead of first use. This may be delivered by the solution provider or by the Trust. This is to ensure staff are training in using the tool in a way that safeguards these types of data. AI tools will vary significantly so the training will be specific to the approved AI tool(s) available for use.

4.3 Use of AI tools that don't involve any personal or commercially sensitive data

AI tools accessed via a web browser, that don't involve any personal or commercially sensitive data, can be used with Academy approval. Care should still be taken to ensure the principles of the use of AI, detailed in section 3, are put into practice. Any software installed on Trust and Academy devices must be authorised and installed by IT.

5 Learner use of AI

5.1 Policies

Policies regarding student use of AI will be determined by individual academies of the Trust. They will need to be appropriate to the age of learners and satisfy requirements of external bodies e.g. individual awarding bodies or JCQ. Academy policies relating to acceptable use, e-safety, student conduct and examinations should refer to the appropriate use of AI.

5.2 Training

Learners should gain age-appropriate knowledge of the principles of safe and responsible use of AI and be able to critically reflect on their own use. This will enable learners to better understand and engage with the AI applications they may encounter. Details of how academies address this should be documented as good practice and so that they are available to share during an inspection.

6 Related Policies

6.1 Related Trust Policies

HoM Information Security Policy
HoM Data Protection Policy
HoM Staff Code of Conduct
HoM Staff Disciplinary Policy

Policy document

HoM Complaints Policy

6.2 Related Academy Policies

Acceptable Use Policy
 E-safety/Online Safety Policy
 Student Code of Conducts
 Complaints Policy

7 Equality Impact

The Trust's responsibilities towards promoting equality, diversity and inclusion have been considered when drafting this policy.

Authored	Date agreed	LGBs	MAT Board	Review date	Comments
June 2024	July 2024	Autumn 2025	July 2024	July 2025	