

## *Artificial Intelligence Policy*

### **1 Introduction**

#### **1.1 Summary**

This policy outlines the Heart of Mercia Multi Academy Trust's 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 security, privacy, bias, safeguarding 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 organisational 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 [policy Paper: Generative artificial intelligence \(AI\) in education](#).

#### **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 AI** – technology that can be used to create new content based on large volumes of data that models have been trained on from a variety of sources.

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

**Personal Data** - any information relating to an identified, or identifiable, living individual.

This may include the individual's name (including initials), identification numbers, location data, online identifier, such as a username. It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity.

**Commercially sensitive data** – information that if disclosed outside of the organisation would likely cause negative consequences for the organisation [Heart of Mercia].

**Learner work** – also known as learner intellectual property, relates to the activities, outputs and evidence generated by an individual's undergoing a learning experience [at one of the Heart of Mercia academies] which are often used to demonstrate understanding or for assessment. For example, assignments, projects, essays, performances, textbook work, classroom work, homework or any other materials written, drawn or performed by a learner.

### **Automated decision-making (including profiling)**

Automated decision-making is the process of making a decision by automated means without any human involvement. These decisions can be based on factual data, as well as on digitally created profiles or inferred data. Automated decision-making often involves profiling, but it does not have to. 'Profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

## **1.3 Audience**

This policy applies to all staff, Trustees, Members and Governors within the Heart of Mercia Trust, including its academies. Parts of the policy also apply to learners across the Trust - these should be reflected in local academy policies covering learner conduct (see 6.1).

## **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, 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.

- **Regulatory & Legal Compliance:** we take steps to ensure any use of AI within the Trust is abiding with our legal requirements in relation to [Keeping Children Safe in education](#), [Intellectual Property](#) law, and JCQ regulations
- **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 and used in compliance with [Data Protection Law](#), and relevant Trust policies.
- **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.
- **Innovation:** our AI policy facilitates the Trust-wide adoption of promising AI technologies to drive innovation in education, in balance with potential risks

## 3 Responsibilities

The Trust must ensure the use of AI is compatible with the legal, regulatory and ethical obligations and standards of the organisation. This means that the Trust, its academies and individual users have a range of responsibilities related to 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 learner work, personal or commercially sensitive data to any AI tool that hasn't been approved by the Trust.**

Approved tools have had data protection, and cyber security compliance reviewed by the Trust and are deemed to have adequate safeguards in place to protect user data and meet the Trust's other legal and regulatory obligations.

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 Transparency

The Trust and its academies should be open and transparent about the general uses of AI within the organisation. Declarations must be made in applicable documentation and/or communications accessible to relevant internal and external stakeholders. This could include: privacy notices; enrolment agreements; staff onboarding documents; IT acceptable use policies etc.

The Trust believes all learners, regardless of age, and parents/guardians have the right to be informed how their intellectual property or personal data is being used within

approved AI solutions adopted by the Trust. Privacy Policies will be regularly updated to explain the AI tools used by each academy and the Trust.

Staff using approved AI solutions must be transparent and accountable in their use of AI. Staff must not misrepresent AI generated output as their own work, and if appropriate should declare or cite where content was produced by AI.

Content created requires critical judgement to check for appropriateness and accuracy. The quality, accuracy and appropriateness of content generated by approved AI solutions remains the responsibility of the professional who produced it, the academy they work within, and ultimately the Trust.

Curriculum areas inputting learner work into an approved AI solution **must inform all learners and parents/guardians, in advance of any use of the solution.** This notification must be sent by the Head of Department or equivalent curriculum leader. Explanations must focus on the intended use, the benefits gained, the safeguards and protocols in place to protect learners' intellectual property and ensure fairness and accountability. Particular focus must be placed on uses of AI to supplement teacher-led assessment and feedback. (see 3.5)

### 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.

Responsibility	Role(s) accountable
Responsible for reviewing and approving new AI tools that involve personal or commercially sensitive data	Chief Data & Technology 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 Data & Technology Officer / IT Hub Managers / Data Protection Officer / Data Protection Leads

### 3.5 Automated Decision-making (including Profiling) and Explainability

The Data Protection Act 2018 gives people the right not to be subject to solely automated decisions, including profiling, which have a legal or similarly significant effect on them.

A decision producing a legal effect is something that affects a person's legal status or their legal rights. A decision that has a similarly significant effect is something that has an equivalent impact on an individual's circumstances, behaviour or choices.

The Trust recognises AI has the capability to be used for automated decision making and profiling.

Examples of automated decision making that could be driven by AI include producing learner feedback; assessing applications for admission; assessing applications for employment.

Use of AI for automated decision making and profiling without prior approval from the Trust is prohibited.

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" protocols should be implemented. Staff need to be able to critically review any AI recommendations, and all use of AI must have proportional human oversight.

Particular care must be taken around the use of AI in assessing or providing feedback on learner work. Feedback derived from AI tools must never be used in the summative assessment or formal evaluation of learners.

### 3.6 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 Heart of Mercia 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 Adoption of AI

### 4.1 Approval and Use of New AI-driven Solutions

Trust approval **must** be sought for any pilots, trials, adoption or use of AI other than those within AI solutions listed in 5.1, 5.2 or solutions subsequently approved.

This applies to solutions comprised predominately of AI-enabled functionality as well as tools with AI functionality embedded alongside other features.

Requests for new AI solutions to be adopted by an academy or within the Trust will be scrutinised for:

- Any possible model training/machine learning
- Cyber security and/or data protection risks
- Safety, and robustness
- Transparency and explainability
- Fairness
- Accountability

As with all technology initiatives, AI solutions will also be scrutinised against the principles outlined in the Trust Technology Strategy.

Requests must be raised by contacting: [information.assurance@heartofmerciaschools.org.uk](mailto:information.assurance@heartofmerciaschools.org.uk)

### ***Approval Grace Period***

Between November 2025 and February 2026 a grace period will apply for pre-existing uses of AI. During this period approval should be sought for existing solutions or usage retired in favour already-approved solutions.

## **4.2 Use of New AI Features / Changes to Existing AI Features in Existing Solutions**

Where significant AI features are introduced to existing platforms and solutions, or where the AI features of existing platforms and solutions change, approval should be sought if:

- The supplier cannot provide explicit guarantees that user input (of any kind) is **not** being used to train or enhance the underlying AI model.
- The feature introduces automatic decision making as per section 3.5.

It is the responsibility of the main administrators or 'owners' of a solution or platform to monitor for changes being made by the supplier and determine if approval is required as per the triggers above.

If it is determined that a new AI feature does not require approval, administrators/owners are responsible for ensuring users of the solution are aware of aspects of this policy relevant to the new AI-driven functionality (e.g learner/parental notification, responsibility for AI output).

Unless triggered by one of the above, changes to the underlying AI model used in a platform does not require approval but administrators/owners should make users aware of possible implications for accuracy and quality of outputs.

## **4.3 Training Requirements for Use of Approved AI Tools**

All users of AI tools 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.

## 5 Approved AI Tools for Staff Use

### 5.1 Large Language Model 'chat' Tools

As of November 2025, the approved generic large language model/'chat' tools for use by staff, Trustees, Members and Governors and academies to conduct task, operations and work for and on behalf of The Trust are:

- Microsoft Copilot Chat within the Trust's or an academy's Microsoft 365 environment
- the Trust-managed ChatGPT Business subscription.

Use of other generic LLM tools, including 'free' tiers of approved tools is not approved.

The use of other LLM tools in the future is subject to the approval process in 4.1.

### 5.2 Other Approved Tools

As of November 2025, other tools comprised predominately of AI-enabled functionality approved for use in the Trust are:

- SLT AI
- Trust-managed subscription for Top Marks AI

The use of other tools comprised predominately of AI-enabled functionality in the future is subject to the approval process in 4.1.

## 6 Learner Use of AI

### 6.1 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
- unless otherwise approved by the Trust, limit the use of large language model 'chat' tools to only Microsoft Copilot Chat operated within the academy's Microsoft 365 environment
- satisfy requirements of external bodies e.g. individual awarding bodies or JCQ.
- comply with age restriction set by AI tools consider online safety
- comply with Keeping Children Safe in Education requirements
- Consider the latest government guidance for use of AI in schools and colleges
- Comply with [filtering and monitoring standards](#), ensuring the appropriate systems are in place and learners are aware

Academy policies relating to acceptable use, e-safety, student conduct, internal assessments and examinations should refer to the appropriate use of AI.

### 6.2 Training

## Policy document

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.

## 7 Related Policies

### 7.1 Related Trust Policies & Documents

Heart of Mercia Information Security Policy  
Heart of Mercia Data Protection Policy  
Heart of Mercia Staff Code of Conduct  
Heart of Mercia Staff Disciplinary Policy  
Heart of Mercia Complaints Policy  
Heart of Mercia Technology Strategy

### 7.2 Related Academy Policies

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

## 8 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
November 2025	November 2025	Spring 2026	December 2025	November 2026	

## ***Appendix 1***

### **A.1 Principles of Safe and Responsible use of AI**

#### **A.1.1 Privacy and Security - of the information (input and output)**

- Data Protection and privacy rights still apply - never upload personal data (student, colleagues or your own) to any AI tool that hasn't been approved
- Apply the same ethics you do to data/information that is on paper, word document or similar

#### **A.1.2 Fairness - of the result (AI output)**

- Consider bias, leading commands and if the data used to train the AI is representative
- Consider accuracy
- Automated decision-making warrants extra caution and additional due diligence checks and approval
- Think about child safety

#### **A.1.3 Reliability and Safety - consider data quality**

- Consider inclusivity – AI learns from itself, and the data inputted (rubbish in rubbish out)
- Consider misinformation
- Consider data quality - learn about AI algorithms

#### **A.1.4 Accountability**

- Human oversight - sense check the output, is it explainable?
- Evaluate the initial output - does it meet the intended purpose and your needs?  
Revise if required
- Verify the output – is it using reliable sources
- Safeguard human rights

#### **A.1.5 Transparency**

- Be transparent about how you have used AI tools
- Reference the use of AI and the sources AI has used
- Avoid overreliance on AI - original thinking matters!

#### **A.1.6 Share and Educate**

- Found something that works – share and help each other to learn
- Teach pupils/ students about responsible use of AI
- AI can provide diverse ideas and perspectives