



Excalibur Academies Trust
AI Responsible Use Policy

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June 2026	Core Executive	May 2025	May 2027

Trust AI Leads	Role
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Document Control Page

Revision	Date	Change	Origin of Change
2	June 2026	A large portion of the document has been re-written. The main structural additions are the new headings listed below; however, amendments have also been made throughout the existing sections to strengthen wording, clarify responsibilities, and reflect current guidance and Trust practice.	
2	June 2026	AI Leads added	
2	June 2026	Other policies and documents amended	
2	June 2026	Governance and responsibilities section added	
2	June 2026	Safeguarding and harmful AI content	
2	June 2026	Approved AI tools Register	
2	June 2026	Detail on data breaches added to 10.4	

Other Policies and Documents Associated
Child Protection & Safeguarding Policy Staff code of conduct IT acceptable use policy Online Safety Policy Data Protection Policy

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1. Introduction

- 1.1 This policy outlines Excalibur Academies Trust's approach to implementing and using Artificial Intelligence (AI) in our educational setting.
- 1.2 Using this policy the Trust aims to harness the benefits of AI while mitigating potential risks and ensuring that staff and students are given a model in which AI can be employed safely, in line with Ofsted guidance and without compromising educational values.
- 1.3 This policy should be read alongside other Trust policies including specifically the Child Protection & Safeguarding Policy.

2. Executive Summary

- 2.1 AI usage is prevalent and now part of the modern world. It offers numerous opportunities for enhancing teaching, learning and administrative processes, leading to improved outcomes and efficiencies for schools.
- 2.2 Through responsible AI usage we aim to:
 - 2.2.1 Enhance academic outcomes and educational experiences for pupils
 - 2.2.2 Support school staff in managing their workload more efficiently and effectively
 - 2.2.3 Educate staff and pupils about safe, responsible and ethical AI use
 - 2.2.4 Incorporate AI as a teaching and learning tool, including to develop staff and pupils' AI literacy and skills
 - 2.2.5 Prepare staff and pupils for a future in which AI technology will be an integral part
 - 2.2.6 Promote equity in education by using AI to address learning gaps and provide personalised support
 - 2.2.7 Improve and streamline school operations to minimise cost, reduce risk and maximise efficiency
- 2.3 This policy outlines considerations for all users of AI to help them comply with applicable laws, regulations, policies and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas.
- 2.4 Specific risks of AI are acknowledged in this policy including:
 - 2.4.1 Bias

2.4.2 Inaccuracy (including hallucinations)

2.4.3 Copyright

2.4.4 Data protection and privacy

3. Governance and responsibilities

3.1 The Trust AI Leads are responsible for oversight of AI adoption and ensuring that AI use aligns with Trust values, safeguarding expectations, legal obligations and educational priorities.

3.2 The Data Protection Officer is responsible for advising on data protection implications, including DPIAs and privacy notice requirements.

3.3 The Director of IT is responsible for technical review, access controls, security configuration and support for authorised AI tools.

3.4 School leaders are responsible for ensuring that staff understand and follow this policy.

3.5 Staff are responsible for using AI only within approved boundaries, checking AI outputs, and reporting any suspected breach or misuse.

4. Scope

4.1 This policy applies to all staff, including temporary staff, consultants, governors, volunteers, contractors and anyone else working on the Trust's behalf. It is also applicable to pupils who will require support and guidance from staff as part of their learning.

5. Use by staff

5.1 Staff are permitted to use AI tools to assist in managing their work, provided their use complies with this policy.

5.2 For this policy, **restricted information** means any personal, confidential, safeguarding, SEND, assessment, commercial, copyrighted/licensed or internal Trust information, including pupil or staff information.

5.3 The following Red/Amber/Green model provides examples of common AI use cases and the level of control required. The examples are not exhaustive. Where a use case does not clearly fit one of the categories below, staff must apply the more cautious category and seek advice from the Trust AI Leads.

Green: permitted with approved unmanaged AI tools: Generic lesson ideas, quiz questions, explanations, drafting non-confidential templates, improving wording or creating generic resources, provided no restricted information is included. AI output must be checked by staff before use.

Amber: Trust-approved tools only: Homework feedback, rubric support, Teams/Classroom assignment workflows, summarising pupil work, report-writing support, analysing class trends, meeting notes, or any other use involving restricted information. Staff must review and remain responsible. These uses are only permitted in Trust-approved AI tools with appropriate DPIA/security review.

Red: not permitted or requires formal approval: AI must not be used as the sole or final decision-maker for regulated coursework, non-examination assessment, exam marks, predicted grades, formal assessment outcomes, safeguarding, SEND, behaviour sanctions, exclusions, HR, or any work submitted for external assessment or accreditation. Some uses may remain prohibited; any exceptional use requires approval through the Trust's agreed governance process, including DPO involvement where relevant.

5.4 **AI-enabled tools and less obvious uses of AI**

AI is not limited to standalone generative AI tools. It may also appear in meeting tools, browser extensions, plugins, search engines, productivity software, MIS platforms, assessment systems, safeguarding systems, HR systems, filtering/monitoring tools and other third-party applications.

AI functionality must not be assumed to be approved simply because it appears in a system already in use. Where AI processes restricted information or influences decisions, it must be reviewed and approved before use.

This includes, but is not limited to:

AI notetakers, recordings and transcripts: Must not be used for Trust meetings unless approved. Participants must be informed before recording, transcription or AI summarisation takes place. Outputs must be stored securely, shared appropriately and retained only as long as necessary.

AI agents: Must not be used unless formally approved. This includes tools that can act on behalf of a user, access systems, retrieve files, send messages, make bookings, change records or run workflows.

Browser extensions, plugins and add-ins: Must not be installed or used with Trust accounts, systems or data unless approved, as they may be able to read webpage content, emails, documents or other visible information.

AI features in existing software: Must be reviewed before use where they process restricted information or influence decisions. Availability within an existing system does not mean the feature is approved.

AI search summaries and research tools: May be used for general research, but staff must check original sources before relying on the information. Restricted information must not be entered unless approved.

- 5.5 Staff must use AI responsibly and must not rely on it to replace professional judgement. Staff remain professionally responsible and accountable for the quality, accuracy and appropriateness of any AI-assisted output.
- 5.6 Staff will receive appropriate training and support to use AI safely and effectively. Staff are responsible for identifying any training or development needs and should discuss these with their line manager.
- 5.7 AI may be used to support teaching, learning and administrative tasks where this complies with the Red/Amber/Green model above. Staff must adapt and check AI outputs to ensure they are accurate, appropriate and aligned with pupil needs and relevant professional standards.

6. Use by pupils

- 6.1 As part of child protection and safeguarding policies and processes, the Trust will ensure that its pupils will continue to be protected from harmful content online, including that which may be produced by AI technology. The Trust will ensure that staff are aware of the risks of AI which may be used to generate harmful content.
- 6.2 Pupils must not enter personal information about themselves or others into AI tools unless this has been specifically approved by the Trust and directed by a member of staff. This includes personal data, pupil or staff information, intellectual property, private information or commercially sensitive information such as contracts.
- 6.3 A culture of responsible AI use will be fostered through engaging pupils in conversations about data privacy, bias, safeguarding and the social impact of AI.
- 6.4 Pupils will be permitted to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis and creative expression.
- 6.5 AI education will be incorporated into the curriculum to provide pupils with an understanding of AI's capabilities, limitations and ethical implications. Guidance will be provided on identifying reliable and trustworthy sources and evaluating the credibility and accuracy of AI-generated information.
- 6.6 Pupils will be taught to use AI honestly and transparently. Where AI has been used to support, draft, edit, structure or develop work, pupils must clearly state that AI has been used and explain how it has contributed to the work. This must be done in line with school and assessment requirements. Pupils will also receive education on the risks and consequences of relying on AI to complete assignments, coursework or homework.

- 6.7 Teaching staff will emphasise the importance of critical thinking, creativity and originality in pupil work, discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations will be communicated to pupils regarding the appropriate use of AI tools, ensuring that their work reflects their own effort and understanding.
- 6.8 For assessed work, coursework or non-examination assessment, pupils must follow relevant awarding body and assessment requirements. Work submitted for assessment must be the pupil's own. Failure to clearly state AI use, or submitting AI-generated work as the pupil's own, may constitute malpractice.

7. Potential misuse

- 7.1 All users of AI are responsible for their own use and must ensure compliance with all appropriate regulations and policies, including but not limited to:
- This AI Responsible Use policy
 - Keeping Children Safe in Education
 - Staff code of conduct
 - IT acceptable use policy
 - Rules or guidance given by the Joint Council for Qualifications or individual Exam Board requirements
 - Child Protection & Safeguarding policy
- 7.2 Staff will not use school or Trust AI tools or data for personal gain or for any means in contravention of applicable laws.

8. Safeguarding and harmful AI content

- 8.1 The Trust recognises that AI can be used to create or manipulate harmful content, including deepfakes, impersonation materials, sexualised imagery, voice cloning, fraudulent communications and misinformation. Any suspected misuse involving pupils, staff or the Trust must be reported in line with safeguarding, behaviour, cyber security and data protection procedures.
- 8.2 Staff should be alert to the risk that publicly available images, videos or recordings of pupils may be misused through AI tools. Publication of pupil images should continue to follow Trust consent, safeguarding and communications procedures, with additional consideration given to AI-enabled misuse.

9. Ethical use

- 9.1 The use of AI systems, in particular Generative AI, must be carried out with caution and an awareness of their limitations. Whether staff are using AI for teaching or school administrative purposes, or with pupils who will make use of this technology, they must be mindful of, and instruct pupils about, the following considerations:

- 9.1.1 Bias – data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender or socioeconomic background
- 9.1.2 Accuracy – information may be inaccurate when generated so any content must be fact checked
- 9.1.3 Currency – AI models may only collate data prior to a certain date and so content generated may not reflect the most recent information.
- 9.2 AI must not be used as the sole or final decision-maker for decisions that have a significant impact on pupils, staff or the Trust.
- 9.3 Staff must ensure their use of AI is proportionate and fair.

10. Data protection implications

- 10.1 Staff and pupils must not enter personal, confidential, safeguarding, SEND, assessment, commercial, copyrighted/licensed or internal Trust information into unmanaged AI tools.
- 10.2 Where AI tools are approved by the Trust for specific purposes, users must only use them within the approved purpose, data type and access controls. Approval for one use does not mean approval for all uses.
- 10.3 Users must make themselves aware of, and where appropriate inform pupils about, the data collection, storage and usage practices associated with AI technologies.
- 10.4 Any new AI tool, AI-enabled feature or new use of an existing AI tool must be assessed to determine whether a Data Protection Impact Assessment, security review or other approval is required. Guidance must be sought from the DPO or Trust AI Leads. If users accidentally use an AI tool that is not on the approved list or are concerned that restricted information may have been entered into an unmanaged or unapproved AI tool, this must be reported promptly to the relevant GDPR Lead for review as a potential data breach.
- 10.5 When signing up to use an AI system, names, email addresses or account information may be shared with the supplier. This may require a DPIA or other data protection review before use.

11. Approved AI tools Register

Green: permitted with approved general AI tools	Amber: pending DPIA / approval	Red: not permitted or requires formal approval
May be used for Green-level tasks such as generic	Amber-level use includes homework	Red-level use includes AI being used as the

<p>lesson ideas, quiz questions, explanations, drafting non-confidential templates, improving wording or creating generic resources, provided no restricted information is included.</p> <p>Approval for Green-level use does not permit Amber or Red-level use. Staff must not enter restricted information into any AI tool unless the specific tool, use case, data type and user group have been approved by the Trust.</p> <p>Staff must not use unlisted AI platforms, apps, browser extensions, plugins, clients or third-party AI wrappers for Trust work unless approved through the Trust's AI approval process.</p>	<p>feedback, rubric support, Teams/Classroom assignment workflows, summarising pupil work, report-writing support, analysing class trends, meeting notes, or any other use involving restricted information.</p>	<p>sole or final decision-maker for regulated coursework, non-examination assessment, exam marks, predicted grades, formal assessment outcomes, safeguarding, SEND, behaviour sanctions, exclusions, HR, or work submitted for external assessment or accreditation.</p>
Approved Green AI Tools	Approved Amber AI Tools	Approved Red AI Tools
<p>Microsoft Copilot Chat Google Gemini for The Key Education ChatGPT Claude</p>		

12. References

- 12.1 Education Data Hub — AI Policy Template 2026. Used and adapted under Creative Commons Licence CC BY-NC-SA 4.0.
- 12.2 Education Data Hub — AI policy guidance and supporting materials for schools.
- 12.3 Ofsted — Ofsted’s approach to artificial intelligence.
- 12.4 Department for Education — Generative artificial intelligence (AI) in education.

- 12.5 Department for Education — Using AI in education settings: support materials.
- 12.6 Joint Council for Qualifications — AI Use in Assessments: Your role in protecting the integrity of qualifications.
- 12.7 Joint Council for Qualifications — Information for candidates: AI use in assessments
- 12.8 Information Commissioner's Office — Guidance on AI and data protection.