THE DIOCESE OF SHEFFIELD ACADEMIES TRUST

# Safe Use of Artificial Intelligence (AI) Policy

| | |
|---|---|
| **Approved by:** | DSAT Trust Board |
| **Last reviewed on:** | Autumn 2026 |
| **Next review due by:** | Summer 2027 |

## Contents:

Statement of intent

1. Legal framework
2. Roles and responsibilities
3. Data protection and cyber-security
4. Using AI tools
5. Misusing AI tools
6. Homework
7. Safeguarding
8. Teaching pupils about the safe use of AI
9. Monitoring and review

## Statement of intent

At The Diocese Of Sheffield Academies Trust, we recognise that the use of artificial intelligence (AI) can help to positively affect teacher workload, develop pupils' intellectual capabilities and prepare them for how emerging technologies will change workplaces. While there are many benefits to the use of AI tools, the content they produce may not always be accurate, safe or appropriate, and could lead to malpractice.

Through the measures outlined in this policy, the school aims to ensure that AI is used effectively, safely and appropriately to deliver excellent education that prepares our pupils to contribute to society and the future workplace.

For the purposes of this policy, the following terms are defined as:

- **AI** – The theory and development of computer systems able to perform tasks normally requiring human intelligence, e.g. visual perception, speech recognition, decision-making.
- **Generative AI** – A category of AI algorithms that generate new outputs based on the data they have been trained on.
- **Misuse of AI** – Any use of AI which means that pupils have not independently demonstrated their own attainment.
- **Identifiable personal information –** Information about a living pupil or member of staff is personal data if the person can be identified from it alone or with other information reasonably available. A name is unnecessary. A face in a photograph, a video, a recognisable voice, an email address, a pupil or staff number or a username may identify someone. A school, year group and unusual incident or a unique staff role may identify someone in combination. Assessment scores, attendance, behaviour records, examples of work, medical or SEND information, education, health and care plans (EHCPs) and safeguarding records are personal data when linked to an identifiable person. Initials, codes and "Pupil A" still count if someone can work out who is meant.

## Scope

This policy applies to all DSAT employees, pupils, governors, volunteers, supply staff, peripatetic staff, contractors, and any individual who uses AI tools within DSAT schools. It applies to all AI systems used for teaching, learning, assessment, administration, communication, and operational purposes.

## 1. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2023) 'Generative artificial intelligence in education'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- JCQ (2023) 'Artificial Intelligence (AI) Use in Assessments: Protecting the Integrity of Qualifications'
- JCQ (2023) 'Suspected Malpractice Policies and Procedures'

This policy operates in conjunction with the following school policies:

- Online Safety Policy
- Cyber-security Policy
- Cyber Response and Recovery Plan
- Data Protection Policy
- Child Protection and Safeguarding Policy
- Acceptable Use Agreement
- Assessment and Examination Policy
- Non-examination Assessment Policy
- Exam Preparation Policy

A Data Protection Impact Assessment (DPIA) must be completed for any AI tool or use-case that involves personal data, automated processing, or presents a significant safeguarding or equality risk. DSAT assesses routine staff use of Copilot Chat collectively in the Trust DPIA, with DPO advice and ICT and safeguarding review.

## 2. Roles and responsibilities

The DSAT Trust Board will be responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Reviewing this policy on an annual basis.
- Ensuring their own knowledge of the use of AI tools in the school is up-to-date.
- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.
- Ensuring the school follows the DfE's digital and technology standards.

The school headteacher will be responsible for:

- Ensuring that staff receive regular, up-to-date training on how to use AI tools in school.
- Ensuring that the use of AI tools in the school is integrated into relevant policies and procedures, the curriculum and staff training.

- Communicating with parents to ensure they are kept up-to-date with how AI tools are being used in the school, how this will impact pupils' education and how the school is ensuring the tools are being used safely and effectively.
- Working with the trust board to review and update this policy on an annual basis.
- Ensuring that AI practices are audited and evaluated on a regular basis.

DSAT's ICT team will be responsible for:

- Providing technical support in the development and implementation of the school's AI practices, policies and procedures.
- Implementing appropriate security measures.
- Ensuring that the use of AI tools is taken into consideration when creating policies and procedures regarding online safety, child protection and safeguarding, and data protection.

AI Tool Approval - No AI tool may be used in DSAT without completing the DSAT AI Tool Review Process, which includes:

- Educational suitability evaluation
- ICT security and vendor due-diligence checks
- Data Protection Impact Assessment (where required)
- Safeguarding review by the DSL
- Equality Impact Check
- Final approval by the Headteacher

The ICT Team will maintain the Trust-wide AI Tool Register.

The DSAT DPO will be responsible for:

- Keeping up-to-date and informed with AI technologies relevant to the school.
- Understanding and maintaining awareness of what the use of AI means for data protection in the school.
- Advising the school on how to integrate the use of AI while complying with data protection regulations.

The school DSL will be responsible for:

- Taking the lead responsibility for online safety in school.
- Undertaking training so they understand the risks associated with using AI tools in school.
- Liaising with relevant members of staff on online safety matters.
- Maintaining records of reported online safety concerns relating to the use of AI tools, as well as the actions taken in response to concerns.
- Reporting to the Executive Central Team about the use of AI tools regularly and how it links to safeguarding.

Each school will appoint an AI Lead responsible for:

- Supporting safe and effective AI use
- Providing first-line guidance to staff

- Liaising with ICT, DPO, and DSL
- Monitoring classroom and administrative use of AI

All staff members will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Taking responsibility for the security of the AI tools and data they use or have access to.
- Modelling good online behaviours when using AI tools.
- Maintaining a professional level of conduct in their use of AI tools.
- Having an awareness of the risks that using AI tools in school poses.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring that the safe and effective use of AI tools is embedded in their teaching of the curriculum.
- Familiarising themselves with any AI tools used by the school and the risks they pose.
- Only using AI tools that have been formally approved through the DSAT AI Tool Review Process.

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from the relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools.
- Reporting concerns in line with the school's reporting procedure.
- Familiarising themselves with any AI tools used by the school and the risks they pose.

## 3. Data protection and cyber-security

The school is aware of the data privacy and cyber-security implications that come with using generative AI tools, and will ensure that all AI tools are used in line with the school's Data Protection Policy and Cyber-security Policy. The school will follow the procedures in these policies to continue to protect pupils from harmful online content that could be produced by AI tools.

Except for routine use of DSAT Copilot Chat as set out below, personal, sensitive or special category data must never be entered into generative AI tools unless the tool is fully compliant with data protection requirements, a DPIA has been completed, and the DPO has formally approved its use.

**Microsoft 365 Copilot Chat.** Staff signed in to standard Microsoft 365 Copilot Chat with their dsat.education account may use pupil and staff information from SharePoint, OneDrive or Outlook when they already have authority to use it for that school task. For example, staff may organise a class trip list or summarise an email about lesson arrangements. Routine use within this policy needs no separate DPO or headteacher sign-off.

Use only the details the task needs. Keep identifiable information out of web searches and external agents, plugins or connectors. Safeguarding casework, medical records and EHCP

or other sensitive SEND details fall outside this routine permission. Check the output before using it and share it only with people authorised to see it.

Use the Trust's MFA sign-in and check that enterprise data protection is active. Microsoft does not use protected prompts and responses to train its foundation models. Standard A1 chat can use selected files or content available in an app such as Outlook. It does not automatically search across Trust email and SharePoint as paid Copilot can. DSAT manages web search settings, retention and audit centrally.

**Photographs, voices and other identifying details.** Never enter identifiable pupil or staff information into personal or consumer AI services such as ChatGPT or Claude. This includes uploading a recognisable photograph, image or voice recording for editing or transformation. The upload itself processes personal data, even if the result is never shared. Use fictional or genuinely anonymised material instead.

Before sharing or publishing a recognisable likeness, including an altered image, check the intended audience, lawful basis, safeguarding restrictions and any permissions required by the school's image policy. Respect the person's dignity and stated wishes. Permission for an ordinary school photograph does not cover AI alteration or a new publication purpose. Consent, where relied on, must cover that specific use and cannot override the ban on consumer uploads.

All staff will be made aware that generative AI tools are able to create believable content of all kinds, for example credible email scams requesting payment, and that the content AI produces may seem more authoritative and believable than usual scams. All staff will apply their best judgement and common sense to manage cyber-security risks effectively and ensure that the DfE's cyber standards are followed at all times.

The school will:

- Protect personal and special category data in accordance with data protection legislation.
- Not allow or cause intellectual property, including pupils' work, to be used to train generative AI models, without appropriate consent or exemption to copyright.
- Review and strengthen cyber security by referring to the DfE's cyber standards.
- Be mindful that generative AI could increase the sophistication and credibility of cyber attacks.
- Ensure that pupils are not accessing or creating harmful or inappropriate content online, including through AI tools.
- Refer to the DfE's Filtering and monitoring standards for schools and colleges to ensure that the appropriate systems are in place.
- Be mindful of the data privacy implications when using AI tools and will take steps to ensure that personal and special category data is protected in accordance with data protection legislation.

The school will be open and transparent whilst ensuring that data subjects understand their personal or special category data is being processed using AI tools.

## 4. Using AI tools

The school will ensure that AI tools are used appropriately to achieve the following aims:

- To reduce workload
- To free up teachers' time
- To assist with the production of high-quality and compliant administrative plans, policies and documents
- To support the teaching of a knowledge-rich computing curriculum
- To teach pupils:
  - How to use emerging technologies safely and appropriately.
  - About the limitations, reliability and potential bias of AI tools.
  - How information on the internet is organised and ranked.
  - How online safety practices can protect against harmful and misleading content.
  - To identify and use appropriate resources to support their education, including age-appropriate resources and preventing over-reliance on a limited number of tools or resources.

Whilst recognising that AI tools can be used appropriately and with benefit to teaching and learning, the school will keep in mind that the content produced by AI tools can be:

- Inaccurate.
- Inappropriate.
- Biased.
- Taken out of context and without permission.
- Out of date or unreliable.

Where AI tools are used to produce administrative plans, policies and documents, all staff members will understand that the quality and content of the final document remains the professional responsibility of the staff member who produced it. Staff members using AI tools to create documents will not assume that AI output will be comparable with a human-designed document that has been developed in the specific context of the school.

Pupils will be made aware of the importance of referencing AI tools correctly when using AI tools to produce work, especially if the work is for an assessment, in order to allow teachers and assessors to review how AI has been used and whether it was appropriate. Pupils' references to AI sources will show the name of the AI source and the date that the content was generated.

Pupils will retain a copy of the questions and AI generated content for reference and authentication purposes in a non-editable format, e.g. a screenshot. Pupils will also provide a brief explanation of how AI tools have been used.

When using AI tools, staff and pupils will ensure that any content produced is scrutinised and cross-checked for its appropriateness and accuracy.

Staff members will be aware that AI tools return results based on the dataset it has been trained on – it may not have been trained on the national curriculum, and may not provide results that are comparable with a human-designed resource developed in the context of the national curriculum. Staff members will be mindful of this in their teaching and marking of pupils' work.

Pupils and staff members will be reminded that using AI tools cannot replace the judgement and deep subject knowledge of a human expert. Staff members will stress the importance of pupils acquiring their own knowledge, expertise and intellectual capability rather than relying on AI tools in their work.

The school will not allow or cause pupils' original work to be used to train AI tools unless it has appropriate consent or exemption to copyright. Consent will be sought from students over 18; however, for pupils under 18, consent will be sought via their parents.

All new AI tools must undergo an Equality Impact Check to ensure that no pupil or group (including SEND, EAL, or disadvantaged pupils) is disadvantaged by their use.

Staff remain fully responsible for all decisions, content and outputs generated using AI. AI tools must never replace professional judgement.

The school will be transparent with pupils, parents, and staff about which AI tools are being used, why they are used, and how risks are managed.

AI tools must not be used for:

- grading or marking work
- automated decision-making about pupils
- safeguarding decisions
- high-stakes judgements

## 5. Misusing AI tools

**Preventing misuse**

The school acknowledges that misuse of AI tools can happen both accidentally and intentionally, and that education and awareness is key to preventing misuse. The school will consider taking the following actions to prevent the misuse of AI tools:

- Restricting access to online AI tools on school devices and networks, especially on devices used for exams and assessments
- Setting reasonable deadlines for submission of work and providing pupils with regular reminders
- Allocating time for sufficient portions of pupils' work to be completed in class under direct supervision, where appropriate
- Examining intermediate stages in the production of pupils' work to ensure that work is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages
- Introducing classroom activities that use the level of knowledge and understanding achieved during lessons to ensure the teacher is confident that pupils understand the material
- Engaging pupils in verbal discussions about their work to ascertain that they understand it and that it reflects their own independent work

- Refusing to accept work that is suspected to have been generated through misuse of AI tools without further investigation
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models
- Investing in educating and training staff, pupils and parents on the use of AI tools and raising awareness of the risks and issues that come with its use

**Identifying misuse**

Staff members will continue to use the skills and observation techniques already in use to assure themselves that pupils' work is authentically their own when attempting to identify a misuse of AI tools.

When reviewing pupils' work to ensure its authenticity, staff members will compare it against other work created by the pupil. Where the work is made up by writing, the staff members will make note of:

- Spelling and punctuation.
- Grammatical usage.
- Writing style and tone.
- Vocabulary.
- Complexity and coherency.
- General understanding and working level.
- The mode of production, i.e. whether the work was handwritten or word-processed.

Staff members will be aware of and look out for potential indicators of AI use, which include:

- A default use of American spelling, currency, terms and other localisations.
- A default use of language or vocabulary which might not appropriate to the working or qualification level.
- A lack of direct quotations and/or use of references where these are required or expected.
- Inclusion of references which cannot be found or verified.
- A lack of reference to events occurring after a certain date, reflecting when an AI tool's data source was compiled.
- Instances of incorrect or inconsistent use of first-person and third-person perspective where AI generated text has been left unaltered.
- A variation in the style of language evidenced in a piece of work, if a pupil has taken specific portions of text from an AI tool and then amended it.
- A lack of graphs, data tables or visual aids where these would normally be expected.
- A lack of specific, local or topical knowledge.
- Content being more generic in nature.
- The inadvertent inclusion of warnings or provisos produced by AI tools to highlight the limits of its ability or the hypothetical nature of its output.
- The submission of pupil work in a typed format, where this is not usual, expected or required.
- The unusual use of several concluding statements throughout the text, or several repetitions of an overarching essay structure within a single lengthy essay.

- The inclusion of confidently incorrect statements within otherwise cohesive content.

Staff members will remain aware that AI tools can be instructed to employ different languages and levels of proficiency when generating content, and some are able to produce quotations and references.

Where necessary, the school will make use of the following programmes and services that are able to analyse content and determine the likelihood that it was produced by AI:

- OpenAI Classifer
- GPTZero
- The Giant Language Model Test Room (GLTR)

## 6. Homework

The school will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI tools regarding homework.

Pupils will be made aware of the appropriate and inappropriate uses of AI tools, and the consequences of its misuse. Pupils will be made aware that it is not acceptable to submit work that has been produced with an AI tool, and of the school's approach to plagiarism and malpractice. Pupils will also be made aware of the risks of using AI tools to complete homework, which include:

- Submitting work that is incorrect or biased.
- Submitting work that provides dangerous and/or harmful answers.
- Submitting work that contains fake references.

The school will not, under any circumstances, accept work which is not the pupils' own.

## 7. Safeguarding

The school acknowledges that generative AI tools can be used to produce content that is dangerous, harmful, and inappropriate. The school will follow the procedures set out in the Child Protection and Safeguarding Policy and the Online Safety Policy to ensure that pupils are not able to access or be exposed to harmful content.

Pupils will be taught about the risks of using AI tools and how to use them safely. Pupils will be made aware of how to report any concerns or incidents involving generative AI, and who to talk to about any issues regarding the use of AI tools.

The school will ensure that the appropriate filtering and monitoring systems are in place to protect pupils online, following the DfE's filtering and monitoring standards.

All staff members will receive training on the safe use of AI as part of their online safety training, which is regularly updated.

### 1 AI-Related Incident Response

All AI-related incidents will follow DSAT's AI Incident Response Procedure:

- Stop the activity immediately
- Report to DSL, ICT, DPO or AI Lead (as appropriate)
- Assess risk (safeguarding, data protection, cyber-security)
- Inform parents where necessary
- Record in the central incident log
- Review and take action (tool suspension, training, disciplinary measures)

## 8. Teaching pupils about the safe use of AI

Teaching about the safe and appropriate use of AI will ensure that pupils benefit from a knowledge-rich curriculum which enables them to become well-informed users of technology and understand its impact on society. Pupils will gain strong foundational knowledge which ensures they are developing the right skills to make the best use of AI tools.

The school will:

- Prepare pupils for changing workplaces.
- Teach pupils how to use emerging technologies, including AI tools, safely and appropriately.
- Raise awareness of the limitations, reliability and potential bias of AI tools.
- Help pupils to understand how information on the internet is organised and ranked.
- Include online safety teaching in the curriculum and how to protect against harmful or misleading content.
- Raise awareness and understanding of protecting intellectual property rights.
- Encourage the safe and responsible use of digital content.
- Teach about the impact of technology, including disruptive and enabling technologies.
- Include teaching about how computers work, connect with each other, follow rules and process data in the curriculum.

Pupils will be supported to identify and use appropriate resources to support their ongoing education through the use of age-appropriate resources, which may include AI tools, whilst preventing over-reliance on a limited number of tools or resources.

## 9. Monitoring and review

The DSAT Trust Board and headteacher will review this policy in full on an annual basis, and following any incidents that occur due to the use of AI tools, e.g. data protection or cyber-security.

The next scheduled review date for this policy is summer 2026.

Any changes made to this policy are communicated to all members of the school community.