



LEARNING ACADEMY PARTNERSHIP ARTIFICIAL INTELLIGENCE POLICY

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Amendments

Policy Date	New Version Number	Summary of change

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Accessibility and Language Support

If you require this policy in an alternative format or language, please contact the Trust People Team or your Head Teacher /Manager/Executive Head/ Member of Trust Leadership Team/Member of Trust Executive Team (as appropriate). We are committed to ensuring that all colleagues have access to our policies and can fully understand and engage with them and will work with you to provide the necessary support and resources.

Learning Academy Partnership Vision for Artificial Intelligence:

This policy pertains to the use of **Artificial Intelligence for all employed colleagues of Learning Partnership Academy Trust**. A separate policy for pupil use of Artificial Intelligence will follow in due course.

The trust envisions a future where all individuals are empowered to flourish through the integration of AI. By developing adaptive and inclusive teaching methods, we aim to leverage technology to eliminate barriers for learners. We acknowledge the critical importance of supporting both colleagues and pupils in this technological evolution. As we adapt to and harness technological advancements, our focus remains on reducing workloads and fostering creativity and innovation. Safety is paramount, encompassing ethics, morality, bias, and plagiarism, with a commitment to transparency in AI usage.

Note:

The word 'must' in this policy signifies a mandatory requirement that colleagues and the institution are obligated to follow to ensure compliance. It denotes actions that are not optional and must be adhered to rigorously to align with GDPR and other regulatory standards. This term underscores the importance of abiding by ethical practices, data security, and transparency in the use of AI tools.

Objectives:

1. **Ensure Data Security and Compliance**: The policy aims to address data security and compliance with GDPR and other relevant regulations, ensuring that all artificial intelligence applications used across the Trust schools and Central team adhere to strict data protection standards.
2. **Promote Ethical and Fair Use of AI**: The policy seeks to promote the ethical use of AI, addressing issues such as bias and fairness, emphasising the importance of using AI responsibly and transparently.
3. **Support Colleagues and Enhance Teaching Methods**: The policy aims to support colleagues by providing clear guidelines on the safe and effective

use of AI. It also focuses on leveraging AI to develop adaptive and inclusive teaching methods, ultimately reducing workloads and fostering creativity and innovation among colleagues and pupils.

4. **Provide Clear Usage Guidelines for Colleagues:** The policy aims to ensure that colleagues have a clear understanding of what AI tools they can safely use, what they can use them for, and how these tools can assist them in their roles.

Ensure Data Security and Compliance:

In adopting AI tools at Learning Academy Partnership Trust, it is imperative we ensure compliance with the General Data Protection Regulation (GDPR). GDPR compliance is crucial for protecting the privacy and personal data of pupils and colleagues, and for maintaining the integrity and trustworthiness of the educational institution. The following points outline key considerations in ensuring that AI tools are GDPR compliant:

- **Data Protection by Design:** Choose AI tools that are built with data protection as a core feature. This includes robust encryption, secure data storage, and minimal data collection in line with GDPR requirements.
- **Consent and Transparency:** Ensure that clear consent is obtained from pupils and colleagues for the collection and use of their data. Provide transparent information about what data is being collected, how it will be used, and who will have access to it.
- **Data Minimisation:** Adopt AI tools that only collect and process the data necessary for the intended educational purpose. Unnecessary data collection must be avoided to minimise privacy risks.
- **Data Subject Rights:** The AI tools must facilitate the rights of data subjects, including the right to access, rectify, and erase their personal data, as well as the right to object to data processing and the right to data portability.
- **Data Processing Agreements:** Ensure that agreements with AI tool providers include clauses that require them to comply with GDPR. This includes provisions for data protection, processing limitations, and obligations in case of data breaches.
- **Regular Audits and Assessments:** Conduct regular audits of AI tools to ensure ongoing compliance with GDPR. This includes assessing the data protection impact, particularly when introducing new tools or making significant changes to existing ones.
- **Training and Awareness:** Provide training for colleagues and pupils (if appropriate) on GDPR compliance, focusing on their roles and responsibilities in protecting personal data when using AI tools.
- **Incident Response Plan:** Develop and maintain an incident response plan to address any data breaches or GDPR non-compliance issues promptly and effectively.

Data Protection

When using Artificial Intelligence applications, colleagues must **anonymise any recognisable data** from their Generative AI prompts, colleagues' names, pupil names, parent names, local authority names, school names. When using generative AI to draft school materials, colleagues must use a pseudonym of 'Mr No Name at 'Test Academy' and only enter personal data when re-drafting the prompt data at a later stage. Further details and examples of this can be found in [Appendix A](#).

Consent Procedures

As per the October 2023 Department for Education policy paper [Generative artificial intelligence \(AI\) in education - GOV.UK](#), colleagues must '*not allow or cause intellectual property¹, including pupils' work, to be used to train generative AI models, without appropriate consent or exemption to copyright*'.

Parents or legal guardians have the right to withdraw their consent for the use of their child's intellectual property in conjunction with generative AI applications and programs.

To support this statement, the Trust will only approve AI applications that do not use data to train the machine learning model. Where new applications are requested as part of continuous review process, the reviewer will specifically seek privacy data to ensure that pupil intellectual property is protected. Where an application requested does use pupil data, the requestee must provide substantial evidence that this application has a clear teaching and learning purpose. Approvals will be made on a case-by-case basis, and specific consent from parents will be sought to cover each of these applications.

Transparency with stakeholders: pupils, parents, governors

In implementing AI in education, transparency with stakeholders - pupils, parents, and governors - is crucial. Learning Academy Partnership will communicate with our community where, how and why we are using AI. Pupils must understand how AI impacts their learning, while parents need to know how it enhances education and safeguards privacy. Governors require detailed updates on AI strategies, educational impacts, and ethical compliance.

Communication of our implementation is identified within this policy, which is freely available on our Trust website. Similarly, the published list of Trust approved AI applications is identified in [Appendix C](#) at the end of this policy.

¹ Pupils own the **intellectual property** (IP) rights to original content they create. Intellectual property can only be used to train AI if there is consent from the rights holder or an exemption to copyright applies. Education institutions must not allow or cause pupils' original work to be used to train generative AI models unless they have appropriate consent or exemption to copyright. Consent would need to be from the student if over 18, and from their **parent or legal guardian** if under 18.

Through the Relationships and Health Education Curriculum, pupils will be taught about artificial intelligence in an age-appropriate manner. Additionally, before Pupils use AI in Trust schools, a separate Pupil AI policy will be developed, at this stage, this will also be referred to in the E-Safety policy for pupils, as part of their acceptable ICT usage in education.

Promote Ethical and Fair Use of AI:

Learning Academy Partnership is committed to promoting the ethical and fair use of AI to support education colleagues and enhance the learning experience. By integrating AI responsibly, we aim to address issues such as bias and fairness, ensuring that all AI tools are used transparently and ethically. This approach not only fosters trust and integrity but also empowers colleagues to utilise AI in a manner that aligns with our core values of fairness and inclusivity.

Bias and Fairness in Artificial Intelligence.

With reference to Ofsted's April 2024 Policy Paper [Ofsted's approach to artificial intelligence \(AI\) - GOV.UK](#), education providers must:

- Ensure they can identify and rectify bias or error.
- Only use AI solutions that are ethically appropriate – in particular, to consider bias relating to small groups and protected characteristics before using AI
- Monitor bias closely and correct problems where appropriate

Bias is inclination or prejudice for or against one person or group, especially in a way considered to be unfair. As AI is machine learning, it has therefore been pre-programmed with bias from the data it was trained with. Where Trust colleagues are unsure of the data used to train the generative AI model, they must seek to monitor and address bias manually when re-drafting their AI exports. Some examples of how to address bias are covered in [Appendix B](#).

All Trust colleagues must ensure that the use of AI tools aligns with ethical standards in education, particularly regarding fairness, transparency, and inclusivity.

When a colleague at Learning Academy Partnership uses generative AI to create content for their role, they retain ownership of the created material. It is their responsibility to proofread and ensure the accuracy of the content, as well as to challenge and address any potential biases present in the data. This ensures that the use of AI aligns with the trust's commitment to ethical standards and fairness

Support Colleagues and Enhance Teaching Methods:

Learning Academy Partnership aims to leverage the power of AI to support education colleague wellbeing by reducing workload. AI-powered tools can achieve this by offering a range of tools designed to significantly reduce the

workload, thereby enhancing the efficiency and effectiveness of their roles, including teaching practice and administration.

Professional responsibility

In the integration of AI tools to support colleagues, reduce workload and enhance teaching methods, it's crucial to emphasise the professional responsibility and oversight of all colleagues at Learning Academy Partnership retain in managing and utilising these tools. While AI offers substantial benefits in terms of efficiency and personalisation, the ultimate responsibility for the educational process remains with the colleague. This section outlines key aspects of maintaining professional responsibility and oversight when using AI tools in education.

Understanding and Expertise

- **Continuous Learning:** All Trust Colleagues must engage in ongoing professional development to understand the capabilities and, importantly, the limitations of AI tools. This knowledge enables them to effectively integrate AI outputs into their teaching strategies.
- **Critical Evaluation:** Trust colleagues must critically evaluate and interpret the data and suggestions provided by AI tools, using their professional judgement to make final decisions.
- **Collaborative Approach:** Encourage collaboration among educators in using AI tools, promoting the sharing of experiences, insights, and best practices.
- **Feedback Loop:** Establish a system for providing feedback on the AI tools' performance, contributing to their continuous improvement. In the '[All Academies](#)' Team, colleagues will find an '[Artificial Intelligence](#)' Channel. This policy will be posted here, with half termly updates, the approval form will be added here XXX, and all colleagues will have access to collaborate and share their own experience of using AI in their role.

Provide Clear Usage Guidelines for Colleagues:

At **Learning** Academy Partnership, **we believe** comprehensive colleague training is essential for the effective integration of AI in education. It equips our colleagues with a thorough understanding of AI tools, allowing them to enhance teaching and learning experiences. Training also ensures adherence to ethical standards and data privacy, important when handling sensitive pupil information. An appropriate series of professional training will accompany the adoption of AI applications.

This includes:

- A short video summary of how AI may support colleagues in schools.
- Training for Headteachers and Business Support Team Leaders on their roles and responsibilities
- Video for all colleagues to have an overview of the Principles of the Trust approach to using AI and a summary of the key points of the Trust AI Policy, as part of Level 2 Safeguarding Training.
- A mini-series of courses on Learning Locker for all staff, including:

What is AI? An introduction to using Co-Pilot and Principles of safe use of AI.

- A course on Learning Locker which support colleagues who wish to use AI, in following the Trust Policy
- The Trust AI Policy
- An additional 'optional' Learning Locker course for those wishing to further develop their use of AI.

Approval and Accountability, Implementation:

To ensure a structured and responsible approach to AI implementation in the Trust, Headteachers and Business Support Team Leaders will be assigned to oversee this integration. These leaders are responsible for guiding and supervising all aspects of AI adoption. Their roles include evaluating the educational value of proposed AI tools, ensuring compliance with legal and ethical standards, and aligning AI initiatives with the Trust's educational goals and policies.

These leaders will be supported by the Trust TTG group in facilitating collaborative learning, ensuring that the voices of educators, admin colleagues, and other stakeholders are considered in the decision-making process. Regular training and professional development must be provided to these leaders to keep them updated on the latest AI advancements and best practices in educational technology.

Accountability Guidelines

All colleagues must read and adhere to this policy. Failure to comply with the guidelines will be addressed in accordance with the colleague code of conduct. This ensures that all colleagues are accountable and act within the established framework.

To maintain a high standard of accountability, the Trust holds Headteachers responsible for the successful implementation and adherence to AI policies within their schools. Additionally, the compliance team is tasked with collating data and feedback to ensure that all AI tools are used in accordance with Trust guidelines. Adherence to all policies and procedures is mandatory, and any misuse will be addressed in line with the colleague code of conduct. In the event of a data breach, this must be reported immediately to the Trust Data Protection Officer for investigation and appropriate action.

List of Trust Approved AI Tools

Learning Academy Partnership has produced a comprehensive list of approved AI tools to ensure fairness and clarity in colleagues' usage. These tools have been carefully selected based on the criteria outlined in this policy, including data security, ethical considerations, and educational value. By providing a clear and vetted list, the trust aims to support colleagues in using AI responsibly and effectively, aligning with our commitment to transparency and ethical standards. A full list of these tools can be found in [Appendix C](#).

Processes for sign off on the introduction of AI tools:

The introduction of AI tools at Learning Academy Partnership follows a formalised approval process to ensure accountability and alignment with the Trust's educational objectives. This process includes: a proposal, including the purpose, benefits, costs, and potential risks associated with the AI tool. An impact assessment, focusing on educational outcomes and/or workload efficiency, data privacy, and ethical considerations.

All colleagues will have access to a Microsoft Form where they can submit a new AI tool for review at any point during the academic year. The aforementioned criteria for application approval will be mandatory on the form for colleagues to complete and submit.

The form will be sent to the Compliance Team for approval; they will oversee AI implementation and will approve or decline proposals.

The workflow rule for this is controlled via Power Automate.

Proposals will be reviewed half termly, and newly approved applications will be added to the list, associated in [Appendix C](#).

References

[Generative artificial intelligence \(AI\) in education - GOV.UK](#)

[Data protection in schools - Generative artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK](#)

[Generative AI in education: user research and technical report - GOV.UK](#)

[Research on public attitudes towards the use of AI in education - GOV.UK](#)

[Ofsted's approach to artificial intelligence \(AI\) - GOV.UK](#)

[Schools - NCSC.GOV.UK](#)

[AI Use in Assessments: Protecting the Integrity of Qualifications - JCQ Joint Council for Qualifications](#)

Appendix A – Anonymising recognizable data.

When using Artificial Intelligence applications, colleagues must anonymise any recognisable data from their Generative AI prompts e.g. colleagues' names, pupil names, parent names, local authority names, school names. Examples of prompts that might use personal data:

- Trip letters.
- EHCPS.
- Pupil reports.
- Emails to parents, external agencies, colleagues.
- Meeting summaries.
- Behaviour incident reports.
- Class Seating Charts / grouping lists.
- Lesson Planning.

- Observation feedback.
- Performance Management / Colleagues Appraisal.
- Professional Development Records.
- School Event Coordination.

When drafting any of the above, colleagues must use pseudonyms for identifying data.

Appendix B – Addressing Bias in Education.

<https://researchbriefings.files.parliament.uk/documents/POST-PN-0712/POST-PN-0712.pdf>

<https://arxiv.org/html/2410.16927>

Appendix C – Trust Approved AI Tools for Colleague Use.

Application name	Application uses	Notes to consider
Microsoft Copilot Chat https://copilot.microsoft.com/	General prompting to generate content. E.g. planning, letter writing, spreadsheet and slide design. Exports well to Microsoft applications.	Only when logged in with your M365 Education licensed account.
Google Gemini Chat https://gemini.google.com/app	General prompting to generate content. E.g. planning, letter writing, spreadsheet and slide design. Exports well to other Google applications.	Only if you have a Google Education licensed account, not through personal Gmail accounts.
Canva AI https://www.canva.com/	Image design	As standard Canva does not use data to train their model, unless a user opt's into data training. If you plan to use Canva AI for work related tasks, please check your Canva account settings to ensure you have the opt out setting enabled.
Quizizz https://quizizz.com/	Converts worksheets into quizzes	Note for bias: Founded in India, based in US. As Standard – does not use data to train the model.

		Results of our AI Tools are only visible to Quizizz users <u>for their own searches</u> . You may <u>choose to opt in</u> to make the educational materials you create public on the Quizizz platform. The Trust does not allow trust resources to be used in this manner. Ensure you have <u>not</u> opted in to this.
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Appendix D – Previously rejected AI Tools for Colleague Use.

Application name	Application uses	Reasons for rejection	Alternative
Udio.com https://www.udio.com/	Allows users to create music from simple text prompts by specifying topics, genres, and other descriptors which are then transformed into professional quality tracks.	You acknowledge and agree that we may use your Input Content and Output to train or otherwise improve our Services, including our artificial intelligence and machine learnings model(s) related to the Services. You must be 13 years of age or older to use the Services.	
Otter.AI https://otter.ai/	Recording meetings and lessons. Real-time captions and notes for in-person and virtual lectures, classes or meetings.	US application. Concerns over legal data holding outside of UK. <i>“Otter uses a proprietary method to de-identify user data before training our models so that an individual user cannot be identified. This training method is automatic (done by AI) and as such audio recordings and transcripts are not manually reviewed by a human. “</i>	Record meetings using Microsoft Teams for Education with captions enabled.
Gamma.app https://gamma.app/	Creating slide decks, websites and animated visuals.	US based company. All data is used to train the model. All content created in Gamma is owned by Gamma and not by the registered user. <i>“you acknowledge and agree that you shall have no ownership or other property interest in your Account, and you further acknowledge and agree that all rights in and to your Account are and shall forever be owned by and inure to the benefit of</i>	Canva AI

		<p>Gamma.”</p> <p>“If you provide us with any sensitive personal information when you use the services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.”</p>	
<p>Briskteaching.com</p> <p>https://www.briskteaching.com/</p>	<p>Simplifies web pages or text. Runs as a Chrome Extension. SEND support.</p>	<p>US based application. Google Chrome extension – requires a chrome browser and Google Edu login. Attached to your Google Drive to use data from files.</p> <p>“We never use student data to improve AI models.”</p>	<p>Immersive reader in Microsoft.</p>
<p>Diffit</p> <p>https://web.diffit.me/</p>	<p>Generates resources</p>	<p>US based application.</p> <p>“you grant Diffit a non-exclusive, transferable, worldwide, royalty-free license, with the right to sublicense, to use, publish, transmit, display, copy, process, adapt, modify, publicly perform, and distribute your User Content in connection with operating, providing, and marketing the Services.”</p>	<p>Microsoft Copilot with EDU login.</p>
<p>Chat GPT</p> <p>https://openai.com/index/chatgpt/</p> <p>chatgpt.com</p>	<p>A wide variety of large language prompts.</p>	<p>“We <u>collect Personal Data</u> that you provide in the input to our Services (“Content”), including your prompts and other content you upload, such as files, images, and audio.”</p> <p>Users need to have a log in. Users needs to go to advanced settings, data controller and change 2 settings to avoid training the model.</p>	<p>Microsoft Copilot with EDU login.</p>