

Liberty Academy Trust
Church Lawton School
Use of Artificial Intelligence Policy

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Key Information

References to internal sources:

- LAT Data Protection Policy

References to external sources:

- International Association of Privacy Professionals: [Key terms for AI governance](#)
- [UK Government White Paper: AI regulation: a Pro-Innovation Approach](#)
- [ICO Guidance on AI and Data Protection](#)
- [DCMS Data Ethics Framework](#)
- [DfE Generative artificial intelligence \(AI\) in education](#)
- Responsible.AI - [Responsible AI in Fundraising Framework](#)
- Google - [AI Principles](#)
- Digital Catapult - [AI Ethics Framework](#)
- [Generative AI: product safety standards](#)

1 Policy statement

- 1.1 Artificial Intelligence (AI) can be a powerful tool to enhance our educational offer to pupils, improve productivity and efficiency. However, AI also raises risks for the rights and freedoms of individuals and must be used in ways that align with our values, legal obligations, data security principles, and the best interests of our pupils, staff and communities.
- 1.2 Artificial intelligence is a broad term that currently lacks a legal definition. AI is used to describe an engineered system that uses various computational techniques to perform or automate tasks. This may include techniques, such as machine learning, where machines learn from experience, adjusting to new input data and potentially performing tasks previously done by humans. More specifically, it is a field of computer science dedicated to simulating intelligent behaviour in computers. It may include automated decision-making. A full glossary of terms is available in section 8 and by using the reference included in 'key information' above.
- 1.3 Legislation and regulation are likely to change considerably as the use and functionality of AI develop. As such, this policy has been developed in line with guidance from the Information Commissioners Office and Department for Education.
- 1.4 AI systems must never replace professional judgement in education, safeguarding, behaviour management or decision-making about pupils. Any use of AI within LAT will be subject to meaningful human oversight at all times and must support – not substitute – the role of qualified staff.

2 About this policy

- 2.1 The purpose of this AI Usage Policy is to establish guidelines for the responsible and ethical use of AI technologies in lieu of current legislation and guidance. This policy applies to all staff, trustees, governors, consultants and third-party providers who work on behalf of LAT and have access to or utilise AI technologies. The AI usage policy complements LAT's wider policy framework, including GDPR/data protection and fair usage of ICT.
- 2.2 As such, this policy has been developed in line with guidance from the Information Commissioner's Office (ICO) and the Department for Education, including the DfE guidance "Generative artificial intelligence (AI) in education", and will be reviewed in response to further statutory or sector-specific updates.

2.3 The personal data which we hold is subject to certain legal safeguards specified in the retained EU law version of the General Data Protection Regulation ((EU)2016/679) ('UK GDPR'), the Data Protection Act 2018 and other regulations (together 'Data Protection Legislation'). LAT's internal processes for managing personal data are available in the Data Protection Policy.

2.4 All LAT staff must read and understand this policy before using any AI platforms or technologies. A statement for pupils is provided below and should be disseminated within existing ICT or other curriculum activities.

3 Principles

3.1 All employees are expected to adhere to the following principles when using AI:

- **Consent:** Data protection laws currently require consent to be given by individuals for the processing of their data. LAT has not asked for or informed individuals that their data might be shared with AI tools and you should not rely on this policy to provide consent. Sharing personal data with any AI tools is prohibited.
- **No automated decision-making:** AI tools must not be used to make automated decisions about pupils, including behaviour, sanctions, assessment outcomes, safeguarding judgements, placement decisions or access to provision. AI outputs may inform professional thinking, but final decisions must always be made by appropriately trained staff.
- **Safeguarding and wellbeing:** AI must never be used in ways that could compromise pupil safety, emotional wellbeing or dignity. Staff must be particularly alert to risks for vulnerable pupils, including autistic pupils, and ensure AI use is predictable, explainable and developmentally appropriate.
- **Protecting confidential data:** We must never upload or share any data with AI tools that is confidential, sensitive, proprietary, or protected. This includes data related to pupils, families and staff. We must comply with all relevant data protection laws, such as the General Data Protection Regulation (GDPR), as well as the code of conduct, safeguarding and online safety policies.
- **Password security:** We must not give access to AI tools access to passwords.
- **Using reputable AI tools:** We should only use reputable AI tools which have been approved by LAT. Any AI tool used must meet our security and data protection standards.

- **Evaluating new AI platforms and technologies:** We must evaluate the security of any new AI platform before using it. This includes reviewing its security features, terms of service, and privacy policy. We must also check the reputation of the tool developer and any third-party services used by the tool.
- **Complying with security policies:** We must apply the same security principles we use for all our data. This includes using strong passwords, multi factor authentication and following our data protection policy.
- **Legal and regulatory practices:** Anyone using AI tools should ensure that they are familiar with the relevant regulatory frameworks before utilising these tools.
- **Bias and Fairness:** We must take reasonable steps to ensure that AI technologies used by LAT do not exhibit discriminatory or biased behaviour based on race, gender, age, ethnicity, or any other protected characteristic.
- **Fact-checking and plagiarism:** We must verify any facts, statistics or statements generated by AI tools and ensure they are not plagiarised from other sources. When using AI tools these should be cited and reference appropriately.
- **First draft principle:** AI tools often create a helpful “first draft” starting point, but any content or material generated should be edited and adapted to ensure adherence to our organisational values, brand guidelines and tone of voice.
- **SEND and accessibility:** AI may be used as an assistive tool to support inclusion, accessibility and engagement for pupils with SEND. However, it must not increase cognitive load, anxiety, dependency or remove opportunities for skill development. Adjustments must be individualised and consistent with a pupil’s EHCP and agreed support strategies.

4 Risk-based Approach

- 4.1 LAT takes a risk-based approach to assess the risks to the rights and freedoms of individuals that may arise when you use AI; and implementing appropriate and proportionate technical and organisational measures to mitigate these risks. This approach is in line with existing requirements in data protection law. They do not mean you can ignore the law if the risks are assessed as low, and they may mean you have to terminate a planned AI project if you cannot sufficiently mitigate those risks.
- 4.2 LAT's Trust Board has agreed a cautious appetite for risk in the use of technology in its operations. There is a balance to be struck between AI-and-data-protection-specific risks, and the implications of those risks for governance and accountability.
- 4.3 In relation to data protection the Trust will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.
- 4.4 In certain circumstances the law requires us to carry out detailed assessments of proposed processing. This includes where we intend to use new technologies, including AI tools, which might pose a high risk to the rights of data subjects because of the types of data we will be processing or the way that we intend to do so.
- 4.5 The Trust will complete an assessment of any such proposed processing and has a template document which ensures that all relevant matters are considered.
- 4.6 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment. Staff are encouraged to speak to the Director of Governance and Compliance and the Head of Digital, Data and Technology before commencing the use of any AI tools.
- 4.7 Educational risk, including the risk of over-reliance, reduced skill development, misunderstanding of AI-generated content, or inappropriate use in assessment or safeguarding contexts.

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6 Approved Platforms

6.1 The following platforms and tools have been approved for use internally. If you would like to request access to these, please speak to the Head of Data, Digital and Technology. Approval relates to data protection and security only and does not imply that all features or uses of a platform are appropriate in all educational contexts. Specific use cases may be restricted by age, role or activity.

- Chat GPT: <https://openai.com/chatgpt>
- Google Bard: <https://bard.google.com/>
- Non Profit Operating System: <https://nonprofitoperatingsystem.com>

7 Using AI Platforms (for Students)

7.1 Pupils and staff may use generative AI tools, whether stand-alone products or integrated into productivity suites including those provided by Microsoft or Google, for:

- content creation, including text, artwork, graphics, video and audio.
- generating ideas and problem solving

7.2 Large language models (LLMs) can generate incorrect facts and citations and so it is important that these are checked and verified from other sources. Image generation models can produce biased or offensive content that should be avoided. You will be responsible for any content you submit, regardless of whether it originally comes from you or an AI tool.

7.3 You must indicate which parts of any work that you submit were created by AI and what was written or created by you. You may not submit any work generated by an AI tool as your own. To do so would be classed as plagiarism.

7.4 The use of AI tools is prohibited during examinations and summative assessments unless explicitly authorised by the school. Where AI is permitted for learning or formative activities, this will be made explicit by staff. AI must never be used to replace a pupil's own thinking, understanding or demonstration of learning.

7.5 Schools will actively teach pupils about the strengths and limitations of AI, including issues of accuracy, bias, hallucination and over-reliance, as part of digital literacy and online safety education.

8 Concerns and escalation

- 8.1 Any concern relating to safeguarding, pupil wellbeing or inappropriate influence on learning or assessment must be escalated immediately in line with safeguarding procedures.
- 8.2 Concerns related to the usage of AI tools should be escalated to the Head of Data, Digital and Technology, or the DPO where concerns relate to data processing. Examples of non-compliance could include the sharing of confidential data on pupils, families or members of staff or uploading confidential documents to help summarise information.
- 8.3 Inappropriate usage of AI tools will be dealt with in line with the school's behaviour policy. Any breaches of the policy may result in disciplinary action, which may include suspension or exclusion.

9 Definitions

- **Accountability** - The obligation and responsibility of the creators, operators and regulators of an AI system to ensure the system operates in a manner that is ethical, fair, transparent and compliant with applicable rules and regulations (see fairness and transparency). Accountability ensures that actions, decisions and outcomes of an AI system can be traced back to the entity responsible for it.
- **Automated decision-making** - The process of making a decision by technological means without human involvement, either in whole or in part.
- **Bias** - There are several types of bias within the AI field. Computational bias is a systematic error or deviation from the true value of a prediction that originates from a model's assumptions or the input data itself. Cognitive bias refers to inaccurate individual judgment or distorted thinking, while societal bias leads to systemic prejudice, favoritism and/or discrimination in favor of or against an individual or group. Bias can impact outcomes and pose a risk to individual rights and liberties.
- **Explainability (XAI)** - The ability to describe or provide sufficient information about how an AI system generates a specific output or arrives at a decision in a specific context to a predetermined addressee. XAI is important in maintaining transparency and trust in AI.
- **Fairness** - An attribute of an AI system that prioritizes relatively equal treatment of individuals or groups in its decisions and actions in a consistent, accurate manner. Every model must identify the appropriate standard of fairness that best applies, but most often it means the AI system's decisions

should not adversely impact, whether directly or disparately, sensitive attributes like race, gender or religion.

- **Input data** - Data provided to or directly acquired by a learning algorithm or machine learning model for the purpose of producing an output. It forms the basis upon which the machine learning model will learn, make predictions and/or carry out tasks.
- **Machine Learning** - A subfield of AI involving algorithms that enable computer systems to iteratively learn from and then make decisions, inferences or predictions based on input data. These algorithms build a model from training data to perform a specific task on new data without being explicitly programmed to do so.
 - Machine learning implements various algorithms that learn and improve by experience in a problem-solving process that includes data cleansing, feature selection, training, testing and validation. Companies and government agencies deploy machine learning algorithms for tasks such as fraud detection, recommender systems, customer inquiries, health care, or transport and logistics.
- **Safety** - The development of AI systems that are designed to minimize potential harm, including physical harm, to individuals, society, property and the environment.
- **Trustworthy AI** - In most cases used interchangeably with the terms responsible AI and ethical AI, which all refer to principle-based AI governance and development, including the principles of security, safety, transparency, explainability, accountability, privacy, non-discrimination / nonbiased (see bias), among others.
- **Human-in-the-loop**: A model of AI use where a human retains oversight, accountability and final decision-making authority, particularly in high-risk contexts such as education, safeguarding and assessment.

10 Social responsibility statement:

Liberty Academy Trust acts with integrity and accountability in all aspects of its operations. We strive to make a positive impact on our students, staff, communities, and the environment by promoting equity, sustainability, and ethical practices. Our commitment to social responsibility underpins every decision we make, ensuring that we contribute to the well-being of society while fostering an inclusive and respectful educational culture.

Appendix A

Student-Friendly Guide to Using AI at Church Lawton School Using Artificial Intelligence (AI) Safely and Fairly

At Church Lawton School we sometimes use computer tools called Artificial Intelligence (AI) to help with learning. AI can be useful, but it must always be used safely, fairly and with adult support. This guide explains what you can and cannot do.

What AI can be used for

You may use AI tools (with staff permission) to help you:

- Get ideas for writing, artwork or projects
- Break tasks into smaller steps
- Help with spelling, grammar or organisation
- Explore topics you are interested in
- Support communication or accessibility needs

AI is there to help you learn, not to replace your learning.

What AI cannot be used for

You must not use AI to:

- Do your work for you
- Pretend AI work is your own
- Make decisions about behaviour, rules or other pupils
- Be used during exams or assessed work (unless a teacher clearly says it is allowed)
- Share personal information about yourself or anyone else

Important things to remember

- AI can get things wrong
- AI can sometimes sound confident even when it is incorrect
- AI does not understand feelings, safety or context in the way people do
- Adults are always responsible for decisions – not AI

Always check AI information with a trusted adult.

Staying safe

To keep everyone safe:

- Never put your name, address, photos or personal details into AI tools
- Never share information about other pupils, staff or families
- Tell an adult straight away if:
 - Something makes you feel uncomfortable
 - AI shows upsetting, confusing or offensive content
 - You are unsure if something is allowed

How this links to school rules

Using AI is part of:

- Online Safety rules
- Safeguarding rules
- Behaviour expectations

If AI is used in an unsafe or unfair way, staff will help you understand what went wrong and put things right. Remember: AI is a tool. People come first.

Appendix B

Parent and Carer Communication: Use of AI at Church Lawton School Artificial Intelligence (AI) in School – Information for Parents and Carers

Church Lawton School and Liberty Academy Trust use Artificial Intelligence (AI) carefully and responsibly to support learning, staff workload and accessibility. This appendix explains how AI may be used, how children are protected, and what safeguards are in place.

Our approach

AI use across Church Lawton School and the Liberty Academy Trust is guided by:

- Safeguarding and child protection duties
- Online Safety and digital resilience
- SEND-inclusive practice
- Human oversight and professional judgement
- DfE guidance on Generative AI in education

AI does not replace staff decision-making and is never used to make automated decisions about pupils.

How AI may be used in school

AI tools may be used by staff or pupils to:

- Support lesson planning and resources
- Generate ideas or first drafts (staff use only)
- Support accessibility and communication
- Aid understanding through scaffolding and prompts
- Support staff workload efficiency

All use is supervised, age-appropriate and risk-assessed.

How AI will not be used

AI will never be used to:

- Make safeguarding decisions
- Decide behaviour sanctions or exclusions
- Assess pupils automatically
- Replace professional judgement
- Process or store pupil personal data
- Be used unsupervised by pupils

Safeguarding and Online Safety

AI use is fully aligned with:

- KCSIE
- School Safeguarding Policy
- Online Safety Policy
- Behaviour Policy
- Data Protection Policy

Key safeguards include:

- No uploading of pupil personal data
- No use of AI for decision-making about pupils
- Clear boundaries for assessment and exams
- Staff training and oversight
- Clear reporting routes for concerns

Any safeguarding concern linked to AI use is treated in the same way as any other safeguarding concern.

SEND and vulnerability considerations

We recognise that many pupils at Church Lawton School:

- Are autistic
- Experience anxiety around unpredictability
- May be vulnerable to over-reliance on technology

Therefore:

- AI use is predictable, structured and explained
- Adjustments align with EHCPs
- Staff monitor emotional impact and dependency
- AI is used as support, not substitution

Transparency and communication

We are committed to openness. Parents and carers can:

- Ask how AI is being used in learning
- Raise concerns at any time
- Expect clear boundaries around assessment
- Be informed of significant policy changes

If you have concerns

If you have questions or concerns about AI use, please contact:

- The school safeguarding lead
- The Head of Digital, Data and Technology
- The Data Protection Officer (for data-related concerns)

In summary:

AI is used carefully, ethically and transparently, always in the best interests of pupils.