



Three
Spires
TRUST

'Life in all its fullness'

AI Policy

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1. Purpose

1.0 The purpose of this policy document is to establish guidelines for the ethical, secure, and responsible use of Artificial Intelligence (AI) technologies in our academy community. It is designed to provide a framework for the appropriate use of AI technologies while ensuring the safeguarding of children, and that students' privacy, security, and ethical considerations are considered. The safeguarding of children is central to the design, development, and deployment of all use of our AI technologies.

2. Scope

2.0 This policy applies to all members of our Trust community, including students, teachers, wider workforce staff, and other stakeholders who may use AI technologies in the Trust environment. It particularly covers, although it is not limited to, generative AI technologies, such as large language models (LLMs).

2.1 The following stakeholders are involved in the implementation of this policy: trust leaders, academy leadership, teachers, wider workforce staff, students and parents/guardians.

3. Policy Statement

3.0 The Trust is dedicated to using AI technologies in an ethical, transparent, and responsible manner. We recognise that AI technologies have the potential to significantly enhance student learning and engagement. However, we also emphasise the importance of safeguarding students, protecting their privacy and ensuring that the use of these technologies aligns with ethical considerations.

3.1 The integration of AI technologies across our academies supports our mission to 'reimagine education, equipping students with the skills they need to thrive in the 21st century. AI technologies can facilitate personalised learning, assist teachers in identifying areas where students need additional support, and enhance research and writing activities. Additionally, they offer opportunities for students to develop critical thinking, problem-solving, and digital literacy skills.

3.2 This policy and associated policies are informed by technological developments, wider understanding of AI on the world, and also the wider DfE safeguarding documents which make explicit reference to our governance and policy practice relating to AI:

- DfE 'Keeping Children Safe in Education' ('KCSIE')
- DfE 'Generative Artificial Intelligence (AI) in Education'
- Online Safety Act 2025
- ICO Guidance on AI and Data Protection

3.3 This policy operates in conjunction with the following trust-wide policies:

- Child protection and safeguarding policy
- Online safety policy
- Managing allegations and low-level concerns policy

- Staff Code of Conduct
- Disciplinary policy
- Safer recruitment policy

3.4 This policy operates in conjunction with the following local academy policies:

- Anti-bullying policy
- Device user agreement
- Staff ICT and electronic devices policy
- Acceptable use policies for both staff and children
- Policies relating to teaching, learning and assessment

4. Procedures and Practice

4.0 Explanation of And Data Use in the Academy Setting

4.0.1 Our academy aims to utilise AI and educational data responsibly to enhance learning, inform decisions, and streamline administration. We securely collect and analyse performance, attendance, assessment, and engagement data to enable evidence-based curriculum, resource, and personalised learning approaches. We may also apply analytics to trace data from digital platforms to gain insights into patterns, strengths, and needs.

Critically, there will always be human oversight in AI-assisted decisions. We are transparent about our AI and data practices, providing explanations of how technologies function, how decisions are made, and how data is handled. Through appropriate anonymisation and aggregation, we remain committed to upholding student privacy while judiciously leveraging data to support outcomes.

Students will have direct access to approved AI systems, used strictly under the guidance of staff and within a controlled environment, as outlined in the *Student Guidance Booklet* (see Appendix B).

Students are expected to be transparent in their use of AI, clearly declaring when and how it has been applied. This must be done in collaboration with the teacher, who will provide explicit approval based on the nature of the task and its intended learning outcomes.

The Trust recognises that the use of AI can present a safeguarding risk to both children and adults. Where there are concerns about the inappropriate use of AI relating to a child or if a child has experienced harm online, we will follow the procedures set out in the Child Protection and Safeguarding policy alongside the Online Safety policy. Concerns regarding a child's online behaviour (including online bullying) are reported to the DSL, who investigates concerns with relevant staff members, e.g. the principal and ICT technicians, and manages concerns in accordance with relevant policies depending on their nature.

Where a safeguarding concern arises regarding the inappropriate use of AI by a member of staff, we will follow our Managing Allegations and Low-Level concerns policy.

After serious concerns are investigated, we will identify any lessons learnt and evaluate our processes if required. We will share information with any relevant partner agency to reduce risk and to prevent abuse taking place online.

4.1 Age-Appropriate Usage

4.1.1 The integration of AI technologies into the classroom will be tailored based on age-appropriateness and developmental levels and will align with the child-centred approach outlined in KCSIE:

Early Years (ages 3-5)

- Teachers and staff will carefully review any potential uses of AI within the curriculum.
- Decisions to use AI must be discussed with the relevant Lead Teacher or Head of Year.

Primary Academy (ages 6-11)

- Students may suggest ways AI could help their learning. But they must not directly use or interact with generative AI systems in the academy
- Only teachers and staff can operate the AI programs and technology. They will review the results first
- AI use is limited to approved educational games and tools. Tools like Chatbots require teacher/staff operation and vetting first

Secondary Academy and Sixth Form (ages 12-18)

- Students are encouraged to suggest appropriate ways AI could support their learning but may only interact with generative AI systems under the direct supervision and approval of staff, in accordance with the Student Guidance Booklet.
- AI use is limited to approved educational games and tools. Tools like Chatbots require teacher/staff operation and vetting first.
- Students may be granted access to approved generative AI platforms, with the level of access and guidance tailored by teachers according to each student's age, maturity, and educational needs.
- For those not directly accessing the platforms, teachers can facilitate interaction in this way:
 - › Students draft their queries or prompts.
 - › Teachers input these into the AI system.
 - › Teachers review the AI-generated responses for appropriateness before sharing them with students.

4.2 Teacher Guidance for AI Use

4.2.1 To ensure responsible and ethical integration of AI, teachers should refer to the *Teacher Guidance Booklet* (Appendix A):

Evaluation of AI Tools and Content

- Thoroughly review educational AI tools, tutors, and generated content for accuracy, relevance to curriculum, and potential biases prior to classroom use.
- Maintain personalised engagement and oversight of student work and assessments enhanced by AI.

- Evaluate to ensure their usability and outcomes support diverse learner needs and backgrounds.

Alignment with Educational Goals

- Ensure any AI systems align with curriculum standards, academy values, and intended educational outcomes.
- Customise AI-generated lesson plans and activities to suit specific students' needs and learning objectives.

Responsible Classroom Integration

- Participate in regular AI ethics training and stay up-to-date on best practices.
- Guide students on using AI technologies responsibly for learning, creativity, and research.
- Incorporate AI in activities that foster critical thinking, technology literacy, and ethical reasoning.
- Use AI for assessments ethically by reviewing computer-generated scores and feedback for fairness, accuracy, and relevance before assigning them.

Transparent and Lawful Data Practices

- Be transparent about use of student data and provide opportunities for informed consent where appropriate.
- Only use enterprise-grade AI tools that protect student privacy and anonymise any shared data.
- Caution students about potential copyright issues with AI-generated content.
- AI must not be used to replace human judgement in safeguarding decisions.

Ongoing Oversight

- Routinely monitor the performance and impact of AI systems, remaining alert to any unintended or harmful consequences. In addition to internal oversight, respond promptly to any guidance or protocols issued by the Trust, ensuring that our use of AI remains safe, ethical, and aligned with wider strategic expectations.
- Promptly report any ineffective, biased or unethical AI system behaviours to academy leadership.

4.3 Examples of Classroom Usage

4.3.1 Teachers play a pivotal role in ensuring the responsible and effective integration of AI in the classroom. They are responsible for overseeing and guiding students' interactions with AI technologies, ensuring that students use them responsibly and ethically. As part of this, teachers will explicitly teach students how to engineer effective prompts to maximize the value and accuracy of AI tools. In addition, teachers should encourage student participation in providing feedback on AI technologies, where appropriate. Three Spires has developed a Red-Amber-Green (RAG) usage framework to guide how teachers integrate AI into their classrooms. This system moves beyond a simplistic yes/no approach, providing a nuanced and scalable method for determining when and how AI technologies may be appropriately used, particularly in the context of assessment. The framework supports more flexible, thoughtful, and responsible integration of AI into teaching and learning.

The RAG framework offers a proactive, tiered approach to AI use, allowing teachers to guide and agree on appropriate engagement before and during the learning process. Where appropriate, tasks may be broken into components, with different levels of the RAG scale applied to each part of the assessment to ensure responsible and purposeful use.

For instance:

'Take handwritten notes on the history of space exploration using your knowledge from the workshop (T1). Once complete, use AI to turn these notes into an essay outline with an introduction, body paragraphs, and a conclusion (A)'

See Appendix A/ B for the RAG Approach to AI in the Classroom.

Before implementing any AI tools in the classroom, teachers are required to consult the '*Age-Appropriate Usage*' section of this policy to ensure compliance.

4.4 Assessments

- 4.4.1 While AI may be used to support the creation of assessments, mark schemes, and rubrics, careful checks and balances are paramount to ensure both quality and fairness.

All AI-generated assessments, mark schemes, and rubrics shall be subject to a comprehensive review by qualified subject experts to ensure their accuracy, relevance to learning objectives, and appropriate scope and rigor.

Continuous monitoring shall be in place to detect and rectify any biases in AI-generated content that may inadvertently disadvantage specific student groups.

For high-stakes evaluations, the academy mandates minimal dependence on AI-generated content. Direct human creation or thorough human review is required.

AI-generated scores or feedback shall not be adopted for official student evaluation or grading without a mandatory human review. The academy recognises that automated scoring systems, while advanced, are not infallible.

While AI can be employed to generate personalised feedback, all such feedback must be approved by relevant educators before dissemination to students.

The academy commits to maintaining transparency with its student body regarding the extent and manner of AI utilisation in their assessments. The goal should be to prudently utilise AI's efficiency for assessments while ensuring its limitations are addressed through ongoing human oversight and auditing.

5. Ethical Considerations, Transparency and Accountability

- 5.0 The Trust acknowledges the significant benefits of integrating artificial intelligence (AI) technologies into the educational environment. This policy outlines the principles and guidelines for the responsible use of AI within the academy community, adhering to the standards set forth by the Joint Council for Qualifications (JCQ) and the Department for Education (DfE).
- 5.1 The Trust will transparently communicate how AI technologies are being utilised, providing clear information about their purpose, functionality, and potential impact on students.
- 5.2 AI-generated content must be subject to effective filtering and monitoring systems. Staff must know about the filtering and monitoring systems used in school. Parents, carers and students must be aware that all ICT use is subject to filtering and monitoring. Staff must read the Online Safety policy in conjunction with this policy.

6. Data Privacy and Security

- 6.0 The Trust will adhere to data protection laws as outlined in our data protection policy to ensure the privacy and security of student and staff data. Any data collected through AI technologies will only be used for legitimate educational purposes.
- 6.1 Prior to the use of AI technologies involving data collection, informed consent will be obtained from students, parents, or legal guardians. The purpose, scope, and implications of data usage will be clearly communicated.
- 6.2 Compliance with GDPR: All AI systems and data processing activities must comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This includes ensuring that personal data is processed lawfully, fairly and transparently.
- 6.3 Third-Party Processors: Any third-party service providers involved in processing personal data must be thoroughly vetted to ensure they comply with GDPR requirements. Contracts with these processors must include data protection clauses to safeguard personal data.
- 6.4 Security Measures: Appropriate technical and organisational measures must be implemented to protect personal data against unauthorised access, loss, or destruction. This includes encryption, access controls, and regular security assessments.
- 6.5 Any AI tool used with students must align with safeguarding policies and data protection standards.
- 6.6 The use of AI must not replace the role of skilled human support; it must enhance, not diminish, the personalisation and professional judgement required in supporting diverse learners.
- 6.7 Tools will be evaluated to ensure they do not reinforce bias or create disadvantage for any learner group.

7. Access and Equity

We are committed to ensuring all pupils, regardless of their language background or learning needs, have equitable access to educational opportunities. AI tools will be carefully selected and implemented to uphold this commitment and support differentiated, individualised learning experiences.

7.0 Promoting Equity and Inclusion:

Promoting Equity and Inclusion

- AI can tailor educational content to meet the diverse needs of students, providing personalised learning experiences that cater to individual strengths and weaknesses.

Bias Mitigation

- AI systems can be designed to minimise biases, ensuring fair treatment of all students regardless of their background.

Cultural Sensitivity

- AI tools can incorporate diverse cultural perspectives, making learning materials more inclusive and relatable for students from different backgrounds.

Language Support for EAL Learners

- AI translation tools (e.g. Microsoft Translator, Google Translate) may be used to aid communication between teachers, pupils, and families.
- AI-powered reading and writing support tools can scaffold language acquisition and vocabulary development.
- Speech recognition tools can assist learners in practicing pronunciation and oral fluency.

Personalised learning and Accessibility for SEND

- AI platforms that offer adaptive learning pathways will be used to tailor content to individual needs and pace.
- Tools that provide text-to-speech, speech-to-text, visual supports, or dyslexia-friendly formats will be prioritised to remove barriers to learning.
- AI-generated scaffolds (e.g. simplified texts, visual cues) may be used to support comprehension and independence.
- In public examinations, the school must apply for a student to use any AI tools that may be appropriate to remove any disadvantage, as identified by the access arrangement assessor.

7.1 Accessibility for All Students

Assistive Technologies

- AI-powered tools such as speech-to-text, text-to-speech, and language translation can support students with additional learning needs, making learning materials more accessible. To use these tools in public examinations, the school must follow the JCQ guidance.

Adaptive Learning Platforms:

- These platforms can adjust the difficulty level of tasks based on the student's performance, ensuring that all students can engage with the material at an appropriate level.

7.1 Equitable Access to Resources

Resource Allocation:

- AI can help academies identify and allocate resources more effectively, ensuring that all students have access to the tools and support they need.

Remote Learning:

- AI can facilitate remote learning opportunities, providing access to quality education for students who may not be able to attend academy in person.

Data-Driven Insights:

- AI can analyse data to identify gaps in educational equity and inform strategies to address these gaps, ensuring that all students have equal opportunities to succeed.

8. Acceptable Use

8.0 The Trust recognises the fundamental importance of both student and staff wellbeing, alongside the safe and responsible use of the internet. AI must only be used in ways that uphold these principles. Staff are expected to educate students on the safe use of AI and online technologies, ensuring all activity aligns with the Trust's Child Protection and Safeguarding policy to protect and promote student wellbeing.

8.1 Clear and comprehensive guidelines regarding the acceptable use of AI technologies within the academy will be established and communicated. Students will receive education on the responsible and ethical use of AI through the NextGEN curriculum.

8.2 The Trust prohibits the use of AI technologies for any activities that violate laws, regulations, or ethical standards. This includes but is not limited to cheating, plagiarism, and any form of academic dishonesty.

9. Academic Integrity

9.0 AI can be used as an aid for academic purposes, such as research, homework, and assignments, where permitted by the teacher. However, it is essential to note that students should not solely rely on AI to complete their work. The use of AI must be in line with Student Guidance Booklet (Appendix B) as outlined in this policy and underpinned by the JCQ guidance. AI must not be used in exams, as this constitutes exam malpractice. Students must not use AI to answer exam questions or seek assistance during the exam. Staff should ensure that students are aware of this policy and the consequences of violating it.

9.1 The Trust is committed to upholding academic integrity. Students are prohibited from using AI technologies to engage in cheating or plagiarism. Clear consequences will be outlined for academic misconduct related to AI use.

9.2 Examples of AI misuse include, but are not limited to, the following:

- Copying or paraphrasing sections of AI-generated content so that the work is no longer the student's own.
- Copying or paraphrasing whole responses of AI-generated content.
- Using AI to complete parts of the assessment so that the work does not reflect the student's own work, analysis, evaluation, or calculations.
- Failing to acknowledge the use of AI tools when they have been used as a source of information.
- Incomplete or misleading acknowledgment of AI tools.
- Submitting work with intentionally incomplete or misleading references or bibliographies.

9.3 Improper use of AI will result in consequences as a breach of trust. Please refer to the Academies' *Acceptable Use Policy* and the academy's *Online Safety Policy* for further guidance on safe and appropriate use of technology.

All forms of plagiarism, including the use of AI, will be handled under the Behaviour Policy.

When it relates to NEA, students will be required to sign candidate authentication statements, and any suspected misuse of AI, will need to be reported to the relevant awarding body.

9.5 What happens when academic dishonesty is suspected?

- The Head of Department will discuss this directly with the student to determine the facts.
- When the authenticity of a piece of work is called into question, the onus is on the student to verify the work at the request of the Head of Department/teacher by producing all preparatory work and evidence. The Head of Department/teacher may also check the student's understanding verbally.
- The Head of Department will inform the Head of Year that a case of academic dishonesty is suspected.
- In cases where academic dishonesty is suspected and is related to exams or non-examined assessment, the Head of Department must inform the academy lead for T&L and the student's Head of Year immediately, before speaking with the student.

9.6 Consequences of Academic Dishonesty

Academic dishonesty compromises the integrity of the educational process. All forms of academic dishonesties are treated seriously, or dependent on the nature of the incident, severely and will be addressed in accordance with each academy's Behaviour policy.

Continual misuse of AI or incidents of plagiarism may result in the withdrawal of access to digital technologies and IT systems, in line with the Trust's *Online Safety Policy* and *Acceptable Use Policy*.

10. Enquiring Original Work

- **Plagiarism Detection:** Staff will use appropriate software to check for originality and prevent copying from AI-generated or other external sources.

- **Academic Integrity Education:** Students will be taught the importance of academic honesty, including how to properly cite sources and use AI tools ethically. This will be supported by staff knowledge of individual students and the application of professional judgement when reviewing submitted work.

Appropriate Use of AI Tools

- **Clear Guidelines:** Specify, in line with the *Student Guidance Booklet* when and how AI tools can be used in assessments.
- **Independent Work:** Require students to explain their thought process to show independent engagement.

Alignment with JCQ Guidelines

- **Consistency:** Ensure policies align with JCQ standards.
- **Regular Updates:** Review and update AI policies to stay current with guidelines and technology.

11. Citation and Referencing

11.0.1 It is essential that students reference the sources they have used when producing work supported by AI: [in line with the *Student Guidance Booklet*](#). Where students use AI, they must acknowledge its use and show clearly how they have used it. Students and staff should be clear that AI-generated content is not subject to the same academic scrutiny as other published sources, and therefore they must exercise caution.

11.0.2 Where AI tools are used as a source of information, students must acknowledge the AI platform, the source, and the date the content was generated. Further guidance regarding citation and referencing can be found in the JCQ and in the *Student Guidance Booklet*.

12. Accuracy and Credibility

12.0.1 Teachers and students should be aware that AI tools are still being developed and there are often limitations to their use, such as producing inaccurate, misleading, or inappropriate content.

12.0.2 AI-generated information needs to be scrutinised for accuracy and credibility before it is used for educational purposes. Teachers will guide students in critically evaluating AI-generated information and understanding its limitations.

12.0.3 AI-generated content should be fact-checked using these specifics: the author of the source material, the website's or author's credentials, what the original source says and in what context, the reason why the information was shared, if there are biases present, how recent the information or study was published, and who else is citing the source.

13. Professional Development

- 13.0.1 **Professional Development:** Staff will receive training on AI technologies, focusing on ethical use, guiding students responsibly and how to recognise risk and any potential safeguarding concern. Training will also support staff in designing tasks that are fully aligned with the Trust's AI framework, ensuring that student engagement with AI is purposeful, age-appropriate, and supports high-quality learning outcomes.
- 13.0.2 We are committed to looking for opportunities to use AI which will bring about benefits for teachers and students. For example, teachers may want to make use of AI to create and support lesson resources. We will explore ways to use AI to reduce workload.
- 13.0.3 DSL and DDSLs receive safeguarding training that covers AI related content and risks.
- 13.0.4 All staff must be trained to recognise AI-related risks such as misinformation, disinformation ('fake news') and conspiracy theories.

14. Academy Engagement

- 14.0.1 The academy will engage with members of the academy community to inform them about the use of AI technologies for educational purposes. As part of our regular surveys, feedback from students, parents and staff will be considered in the ongoing evaluation and development of AI use.

15. Environmental Impact

- 15.0.1 The environmental implications of AI, including the extraction of rare minerals for hardware and the energy consumption of cloud computing, are recognised by the Trust.
- 15.0.2 AI technologies that prioritise sustainability will be encouraged, with a preference for solutions powered by renewable energy sources or those with a lower carbon footprint.
- 15.0.3 Energy consumption of cloud-based AI platforms will be carefully considered, with a focus on selecting providers committed to reducing their environmental impact. Additionally, efficient data storage and processing solutions will be prioritised to minimise resource use.
- 15.0.4 Staff and students will be educated about the environmental impact of AI technologies, fostering awareness and promoting responsible use.
- 15.0.5 Data management practices will be implemented to reduce the need for excessive data storage, helping to mitigate the environmental cost of data centres.

16. Reviewing and Updating the Policy

- 16.0.1 The Trust is committed to regularly reviewing and updating this AI Policy to align with emerging best practices, technological advancements and changes in regulations.
- 16.0.2 The Trust will regularly assess the ethical implications of AI technologies and be prepared to make adjustments or discontinue the use of certain technologies if ethical concerns arise.

Appendix A

Appendix B