CONSILIUM ACADEMIES

Artificial Intelligence Policy

January 2025

EXCELLENCE AND EQUITY WITH INTEGRITY

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Approved by:	Trust Board
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Consilium Academies

Introduction and Principles

Consilium Academies advocates the careful and considered use of artificial intelligence (AI) as a means to reduce staff workload, enhance student experience, and improve educational outcomes.

Any usage of AI must be undertaken with due regard and consideration to other existing Trust policies, particularly as they relate to the safeguarding of students and staff, security of data, and the management of sensitive and confidential information.

Publicly available AI tools, systems and models, whether paid for or free, do not fall within the data security of the Trust. That is, we should assume that the data sent to such tools/systems/models may be intercepted by unknown third parties. As such staff should exercise **extreme caution** when using such tools and **never use them to process any specific data about students or staff.**

Any breaches of this policy or other related policies will be dealt with in line with the Trust's performance management and, if appropriate, disciplinary procedures.

Any and all activity in school, including the use of AI, should be undertaken with a full and thorough understanding of the latest 'Keeping Children Safe in Education (KCSiE)' guidance, noting in particular within that document that:

> *'All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues*[1]*.*

Department for Education (DfE) guidance also states that:

> *'[Schools should] ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through generative AI – keeping children safe in education provides schools and colleges with information on: what they need to do to protect pupils and student online; and how they can limit children's exposure to risks from the school's or college's IT system*[2]*.*

OFSTED have also published guidance on the use of AI within educational providers. They state:

> *'OFSTED supports the use of AI by providers where it improves the care and education of children and learners. We recognise that these tools can help providers make better- informed decisions, reduce workload and lead to innovate ways of working*[3]*.*

Within the bounds of the regulatory principles applied by OFSTED the following are what providers are expected to do in relation to AI:

- *Safety, Security and Robustness – Providers are expected to: assure themselves that AI solutions are secure and safe for users and protect users' data; and ensure they can identify and rectify bias or error.*
- *Appropriate transparency and explicability – Providers are expected to be transparent about their use of AI, and make sure they understand the suggestions it makes.*
- *Fairness – Providers are expected to only use AI solutions that are ethically appropriate. In particular, we expect providers to consider bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.*
- *Accountability and governance – Providers are expected to ensure that providers and their staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI.*
- *Contestability and redress – Providers are expected to: make sure that staff are empowered to correct and overrule AI suggestions. Decisions should be made by the user of AI, not the technology; and allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair* treatment.

1. https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

[2] https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative- artificial-intelligence-ai-in-education

[3] https://www.gov.uk/government/publications/ofsteds-approach-to-ai

Governance, Roles and Responsibilities

The governance, roles and responsibilities pertaining to AI falls within the wider bounds of existing responsibilities as set out in the IT Security, Data Protection and other related policies and procedures. Staff, Trustees and LAB members should refer to these policies alongside this policy.

Specifically in relation to AI:

- The Trustees will oversee the Trust's strategic approach to the use of AI. They will consider through the Audit and Risk committee the risk presented by AI at the strategic level.
- The Director of IT Services will direct the Trust's position on acceptable use of AI as defined within this policy document. In collaboration with the Trust Data Protection Officer, Principals and other senior leaders, they will identify suitable training to support leaders, staff and LAB members to use AI safely and effectively.
- Local Academy Boards will be responsible for monitoring and understanding the AI systems, tools and models used by their school, including their impact on student outcomes, student experience and staff workload.
- Principals will be responsible for understanding the requirements of this policy and ensuring that staff within their respective schools understand and adhere to the policy.
- **Staff will be responsible for complying with the requirements of this policy and other related policies, specifically ensuring sensitive or personally identifiable data is only processed within approved Trust controlled/managed AI platforms. Users of AI should check the Trust's approved platforms prior to use; a list of which will be available on the Consilium Hub. In relation to Microsoft and Google platforms such as Copilot and Gemini, all data must be processed using the 'work' official platforms and not personal accounts.**

Definitions and Understanding

What is AI?

AI is a fast growing and rapidly changing sector of computer science. There are numerous different forms of artificial intelligence ranging from Machine Learning to Generative AI and Large Language Models. Regardless of the terminology used or the particular methods used, AI refers to automated systems carrying out tasks based on human/user input, often in a way than can learn, reason or deduce meaning and then act autonomously to produce an output.

How does AI work?

AI systems typically work by using large amounts of data which is available to it either from user input or more commonly from the wider internet and carrying out vast numbers of iterations to refine an output. Any AI system therefore is only as 'intelligent' as the information with which it is provided.

Given that much of the data resources used by AI come from the wider internet, staff should consider the degree to which any output provided by an AI tool is subject to bias which may be inherent within the wider internet resources which have been used to create the output.

What do we mean when we use AI in an educational context?

As set out in the general principles section of this policy, the use of AI to reduce workload and streamline otherwise administrative or 'non-value-adding' tasks is the most common usage of AI within the educational sector. Various government and other private resources are developing tools to support teachers and other education professionals to reduce workload and improve overall educational outcomes. The Trust will maintain a page on the Consilium Hub to provide up-to-date resources available to staff.

In certain cases, it may be appropriate for students to use AI tools to enhance their learning. Such cases should be carefully considered and any usage of such tools within the educational environment closely monitored by teaching staff.

Usage and Specific Risks

Any usage of artificial intelligence or AI tools is subject to the same policy framework as any other IT system or system through which data in processed. It is therefore essential than any AI tool is only used where the Trust's IT Regulations and various Data Protection policies have been considered.

Specifically, no sensitive, confidential, or otherwise restricted data or information about any member of school/Trust staff, LAB member, or student should be entered into any AI systems, tools or models.

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

- Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. AI systems are trained on data, often publicly available through the internet. Such data can and does reflect the biases that exist in the real world. This means that AI systems may produce their outputs in a way that is biased against certain groups of people. This could lead to students being exposed to biased information or being treated unfairly.
- Accuracy – information may be inaccurate when generated so any content should be fact-checked.
- Currency – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.
- Misinformation - Generative AI is not always accurate and can be used maliciously to create various forms of misinformation. As with any source material, due regard should be given to its reliability, verifiability and veracity before it is used.
- Costs - Many current AI tools are provided free of charge, however, it is likely that more sophisticated models will require payment and/or free resources will not be free forever. Due regard should therefore be given to the level of reliance placed on AI tools and their future financial sustainability.
- Transcription Ais - Particular consideration should be given to any AI tools used to automatically transcribe or take notes from meetings. Where these tools are being used, no discussion of specific students, staff or otherwise sensitive or confidential data should be undertaken. Unless a subsequent DPIA has been approved by the Data Protection Officer, only Microsoft Teams transcription should be used for this purpose.

Use of AI by Staff

Staff are permitted to explore and utilise AI-based tools and technologies to assist in managing their work. Examples of such tasks may include marking and feedback, report writing, lesson planning, professional development and facilities management. AI can provide valuable support while still incorporating professional judgment and expertise.

AI tools will be used responsibly, ensuring they complement staff professional judgment and expertise, without replacing them.

Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used.

Staff will receive appropriate training and support to effectively integrate AI into their work including professional development opportunities focused on AI tools and their effective integration into school administrative and teaching practices. Training and support will be planned as part of staff personal development reviews and appraisals or on an as-needed basis. Staff have a responsibility to identify any training, and development needs to ensure they adhere to this policy and should discuss these with their line manager.

AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, AI-based platforms can suggest specific topics or learning activities. Teaching staff are permitted to use these suggestions as a starting point, incorporating their professional expertise to customise the lesson plans and make necessary adjustments to ensure student learning objectives are met.

AI tools can be utilised to automate certain aspects of marking of student work, such as multiple-choice or fill-in-the-blank assessments. Teaching staff can use AI-powered marking software to speed up scoring fact-based responses to objective questions, providing more time to support students individually.

Teaching staff can also use AI to identify areas for improvement in more subjective written answers. Teaching staff will review and verify AI-generated marks or feedback to ensure accuracy, and add their professional judgment, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.

Teaching staff can also support students to gain feedback on their work themselves using AI, replicating peer assessment processes. This will allow students to receive instant personalised and valuable feedback and improvement strategies on their work, helping to identify misconceptions and gaps in knowledge, as well helping them develop more structured or creative writing. It is important that teaching staff play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.

Teaching staff can use AI to assist in writing student reports, ensuring accuracy and efficiency while maintaining their professional judgment. Where AI has been used to support with report writing, the staff member will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.

Staff can use AI as a starting point to gather relevant information and identify patterns in student attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each student's progress. By using AI responsibly in student progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on students' academic achievements and overall development.

Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws.

Use of AI by Students

As part of child protection and safeguarding policies and processes, the school will ensure that its students will continue to be protected from harmful content online, including that which may be produced by AI technology and that any AI tools used are assessed for appropriateness for individual students' age and educational needs. We will ensure that staff are aware of the risks of AI which may be used to generate harmful content including

deepfake and impersonation materials.

Students will be permitted to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis, and creative expression.

A culture of responsible AI use will be fostered through engaging students in conversations about data privacy, bias, safeguarding, and the social impact of AI applications.

Students will be taught not to enter personal, sensitive or confidential data into Generative AI tools.

AI education will be incorporated into the curriculum to provide students with an understanding of AI's capabilities, limitations, and ethical implications. Guidance will be provided on identifying reliable and trustworthy AI sources and evaluating the credibility and accuracy of AI-generated information.

AI tools and technologies may be integrated into teaching and learning activities across various subjects and year groups, providing students with hands-on experience and opportunities to develop AI literacy and skills.

Potential Misuse of AI

Students will receive education on responsible and ethical AI use, including the potential risks and consequences of relying solely on AI tools to complete assignments, coursework, or homework. Students will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.

Teaching staff will emphasise the importance of critical thinking, creativity, and originality in student work, discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations will be communicated to students regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.

Key messages are delivered as part of the curriculum and re-emphasised in all subjects where students are completing work for external grading.

The Trust will follow and adhere to any rules or guidance on the use of AI in assessments given by the Joint Council for Qualifications or individual Exam Board requirements.

Teaching staff will employ various assessment methods to evaluate student understanding and ensure that they have genuinely grasped the subject matter. This may include class discussions, oral presentations, practical demonstrations, written reflections, and project-based assessments. By utilizing diverse assessment strategies, teaching staff can verify students' comprehension beyond what AI tools can assess, promoting deep learning and authentic student engagement.

Teaching staff will educate students on the potential misuse of AI by those seeking to deceive or trick students into actions that they would otherwise not contemplate, for example interaction with others who are not who they claim to be, but who can imitate who they claim to be using AI technology.

Data Protection when using AI

Staff and students should be aware that any information entered into a Generative AI model is no longer private or secure. Staff and students **must not** enter any personal information (personal data, intellectual property or private information (including commercially sensitive information, such as contracts) into any

Generative AI model. Staff should make themselves aware of and inform students about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

Staff who wish to utilise AI tools must ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment is required and follow the school Data Protection Policy and Data Protection Impact Assessment Process/Procedure.

When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out.

Any DPIA or assessment of the data protection aspects of the use of AI will include:

- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.
- What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.
- A clear indication where AI processing and automated decisions may produce effects on individuals.
- Consideration of both individual and allocative harms (for example, where the harm results from a decision to not permit a student to take a certain subject at GCSE or A Level) and representational harms (for example, selecting groups of students for different interventions results in gender or racial bias).
- How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.
- An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
- If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy in order to justify the use of the AI tool in the DPIA.
- If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
- Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
- The potential impact of any security threats.
- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders.
- Whether processing is intentionally or inadvertently processing special category data- there are many contexts in which non-special category data is processed, but infers special category data (for example, where a postcode infers a particular race).
- A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

Cyber security

Our school will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to the Director of IT Services and the Data Protection Officer.
- Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.
- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and students to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crimes.

Appendix A – Glossary of Common Terms

Term	Meaning
AI	Artificial Intelligence - The UK Government's 2023 policy paper on 'A pro-innovation approach to AI regulation' defined AI, AI systems or AI technologies as products and services that are 'adaptable' and 'autonomous'.
DL	Deep Learning - A subset of machine learning that uses artificial neural networks to recognise patterns in data and provide a suitable output.
Generative AI	An AI model that generates text, images, audio, video or other media in response to user prompts. It uses machine learning techniques to create new data that has similar characteristics to the data it was trained on. Generative AI applications include chatbots, photo and video filters, and virtual assistants.
LLM/LLP	Large Language Models/Large Language Processing - A type of foundation model that is trained on vast amounts of text to carry out natural language processing tasks.
ML	Machine Learning - A type of AI that allows a system to learn and improve from examples without all its instructions being explicitly programmed. Machine learning systems learn by finding patterns in training datasets. They then create a model (with algorithms) encompassing their findings. This model is then typically applied to new data to make predictions or provide other useful outputs, such as translating text.
NLP	Natural Language Processing - This focuses on programming computer systems to understand and generate human speech and text. Algorithms look for linguistic patterns in how sentences and paragraphs are constructed and how words, context and structure work together to create meaning. Applications include speech-to- text converters, online tools that summarise text, chatbots, speech recognition and translations.
Prompt	An initial input by an end user into an AI model, tool or system used to instruct the AI to produce the desired output.