South Farnham Educational Trust

The Continual Pursuit of Excellence

# Use of Artificial Intelligence (AI) Policy

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| REVIEW DATE: | Summer 2026 |
| NEXT REVIEW DATE: | Spring 2027 |

## Introduction

This policy covers the use of Artificial Intelligence (AI) within South Farnham Educational Trust (SFET) schools, including both primary and secondary schools, South Farnham SCITT and SFET Teaching School Hub. The policy does not prohibit the use of AI for teaching and learning and administrative purposes but aims to add clarity around appropriate and safe use.

South Farnham Educational Trust are committed to the ethical and responsible use of AI and recognise the emerging opportunities to reduce teacher workload, develop intellectual capabilities and prepare pupils and trainee teachers for future use of technology in the workplace. Although AI tools offer numerous benefits, the content they generate may not always be accurate, safe, or suitable, and could result in malpractice.

The aim of this policy is to ensure that AI is used safely and appropriately by pupils, trainees, apprentices and staff. The policy does not prohibit the use of AI for teaching and learning but aims to add clarity around appropriate use for all stakeholders and positions the requirement for ongoing professional development across the whole community to influence behaviour and find/promote best practice.

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

- **Artificial Intelligence (AI)** – The theory and development of computer systems designed to perform tasks that typically require human intelligence, such as visual perception, speech recognition, and decision-making.
- **Generative AI** – A category of AI algorithms where Large Language Models (LLM) are trained using huge amounts of data, and then used to generate new content such as text, code, answers to questions, human-style responses, audio, video, simulations, diagrams and images, prompted by human input (i.e. *ChatGPT* and *Google Bard*).
- **Misuse of AI** – The use of AI by staff, trainees, or pupils to replace professional judgment, bypass independent demonstration of their own abilities, or violate data protection, online safety, and acceptable use of IT policies. This includes the inappropriate or harmful application of AI tools that result in negative outcomes, such as spreading misinformation, breaching privacy, enabling discrimination, or causing harm to individuals or society. Such misuse can be intentional, such as using AI for malicious purposes, or unintentional, arising from flawed design or insufficient oversight.

The policy allows for differential use across the Trust (phase, role, school/SCITT) and should be read in conjunction with the following SFET policies:

- Child Protection and Safeguarding Policy
- Online Safety and Acceptable Use of IT Policy
- Data Protection (GDPR) Policy
- Secure Data Handling Policy
- Staff Behaviour Policy
- Discipline Capability Policy
- Assessment Policy

- Non-examination Assessment Policy
- Trainee Learner Contract/Apprentice Commitment Statement

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

- Keeping Children Safe in Education (DfE 2024) https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf
- Generative artificial intelligence in education (DfE 2023) https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education
- Education Data Hub (2024) 'AI Guidance for Schools' version 1.2 https://educationdatahub.org.uk/wp-content/uploads/AI-Guidance-for-Schools.pdf
- Data Protection Act 2018
- UK General Data Protection Regulation
- Meeting digital and technology standards in schools and colleges (DfE 2023) https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges
- Artificial Intelligence (AI) Use in Assessments: Protecting the Integrity of Qualifications (JCQ 2023) https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/
- Suspected Malpractice Policies and Procedures (JCQ 2023) https://www.jcq.org.uk/wp-content/uploads/2023/02/Malpractice_Feb23_v1.pdf

## Roles and responsibilities

The **Trust Board** will be responsible for:

- Compliance with statutory guidance and legislation.
- Keeping their understanding of AI tools used within the trust current and up to date.
- Ensuring all governors and staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.

The **Local Governing Body/SCITT Strategic Board** will be responsible for:

- Ensuring their own knowledge of the use of AI tools in the school/SCITT is up to date.
- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.
- Ensuring the school follows the DfE's digital and technology standards as far as possible.

The **Headteacher/Director of ITT** will be responsible for:

- Monitoring the use of AI tools used within the school/SCITT and make the decision if and when to obtain a license for a specific AI tool.
- Integrating the use of AI tools in the school/SCITT into relevant policies, training, guidance and procedures.

- Ensuring that staff receive regular, up-to-date training on safeguarding (that includes use of AI).
- Communicating with parents/trainees to ensure they are kept up to date with how AI tools are being used in the school/SCITT and how the school is ensuring the tools are being used safely and effectively.
- Audit and evaluate use of AI on a regular basis.
- Ensuring IT technicians provide technical support in the development and implementation of the school's AI practices, policies and procedures, tailored to the needs/educational phase.
- Ensuring IT technicians/managed service are implementing appropriate security measures.

The **DPO** will be responsible for:

- Keeping up-to-date and informed with AI technologies relevant to the school.
- Understanding and maintaining the awareness of what the use of AI means for data protection in the school.
- Advising on data protection compliance with AI use, ensuring that schools adhere to data protection regulations.

The **DSL** will be responsible for:

- Online safety in school.
- Keeping up-to-date with safeguarding in relation to the use of AI in education settings.
- Providing regular updates to the Headteacher and Director of ITT on the use of AI tools and their connection to safeguarding.
- Collaborating with appropriate staff members on matters related to online safety.
- Keeping records of reported online safety issues relating to the use of AI tools, as well as the actions taken to address them.

All **staff and trainee teachers** will be responsible for:

- The safe and effective use any AI tool used.
- Maintaining and modelling a professional standard of conduct while using AI tool.
- Following relevant policies and guidance (including the Online Safety and Acceptable Use Agreement).
- The security of AI tools and the data they use or have access to.
- Familiarising themselves with any relevant AI tools used by the school and the risks they pose.
- Reporting concerns in line with the school's reporting procedure.

**Pupils** will be responsible for:

- Complying with the Online Safety and Acceptable Use Agreement, along with other relevant policies and school rules.
- Not entering personal data into generative AI tools (including email address).
- Reporting any concerns to a member of staff.

## Data protection, cyber security and online safety

AI tools must be used in line with school/trust/SCITT policies (as referenced within this policy).

The school/SCITT will follow the procedures in these policies to continue to protect all stakeholders from harmful online content that could be produced by AI tools.

The school/SCITT will:

- Protect personal and special category data in accordance with data protection legislation. Staff will not enter data that is classed as personal or special category data into AI tools under any circumstances. Any data entered will not be identifiable and will be considered released to the internet.
- Not allow or cause intellectual property, including pupils' work, to be used to train generative AI models, without appropriate consent or exemption to copyright.
- Ensure that pupils are not accessing or creating harmful or inappropriate content online.
- Review and strengthen cyber security by referring to the DfE's cyber standards (https://www.gov.uk/guidance/meeting-digital-and-technologystandards-in-schools-and-colleges/cyber-security-standards-for-schools-andcolleges) and be mindful that generative AI could increase the sophistication and credibility of cyber-attacks.
- Ensure (and test) filtering and monitoring is in place (DfE guidance: Filtering and monitoring standards for schools and colleges)

## Using AI tools effectively and appropriately

*'Generative AI tools can make certain written tasks quicker and easier but cannot replace the judgement and deep subject knowledge of a human expert. It is more important than ever that our education system ensures pupils acquire knowledge, expertise and intellectual capability'* (DfE, 2023).

The school/SCITT will ensure that AI tools and activities are suitable for the school phase are used appropriately to achieve the following aims and opportunities:

- To use technology safely and effectively to deliver excellent education that prepares pupils/trainees for future workplaces.
- To reduce workload (particularly on non-pupil facing activities).
- To assist with the production of high-quality documentation.
- To support the teaching of the computing curriculum.
- To develop thinking by checking responses, providing counter-arguments and generating questions.
- To support research.
- To identify and use appropriate resources and approaches.
- To actively involve parents in understanding and supporting the safe use of AI tools, providing regular updates and resources.
- To address the ethical implications of AI use, including potential biases and the importance of promoting fairness and inclusivity.

- To establish clear procedures for pupils, parents, and staff to provide feedback on AI use and report any concerns.
- Over time include case studies or examples of successful AI integration in both primary and secondary settings to illustrate best practices.

## Preventing the misuse of AI tools

The school/SCITT recognise that AI tool misuse can be accidental and intentional, and that education is essential to prevent this. The school/SCITT will consider where it is necessary to restrict access to online AI tools on school devices and networks, especially on devices used for exams and assessments.

The school/SCITT will keep in mind that the content produced by AI tools can be:

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

Generative AI returns results based on the dataset it has been trained on – for example, a generative AI tool may not have been trained on the English curriculum and may not provide results that are comparable with a human-designed resource developed in the context of our curriculum.

The school/SCITT agree the following principles:

- Generative AI tools cannot replace the judgement and deep subject knowledge of a human expert. It is essential that pupils/trainees acquire their own knowledge, expertise and intellectual capability.
- Pupils and trainees should not use generative AI as the first step in their thinking.
- Pupils and trainees should not circumvent their learning (e.g. when asked to reflect on a task).
- We must teach pupils and trainees that access to generative AI is not a substitute for having knowledge in our long-term memory and that sense-checking results is reliant on a schema against which to compare them.
- AI should not be used to generate personalised feedback to pupils/trainees on formative and summative assessment. The justification of a mark/grade should be a human judgement.
- Where AI is used to create administrative documents, the staff member who produced them remains responsible for the quality and content. Staff should not assume AI-generated documents match the quality or context of those created by humans.
- Any content produced by generative AI tools requires professional judgement to check for appropriateness and accuracy.
- Staff/trainees/pupils must not use AI to generate documents/ITT evidence with personal data, as the software may store and reuse this information. Any data entered will not be identifiable and will be considered released to the internet.
- Assessed work must always be the pupil's/trainee's own writing and must not contain computer generated text directly (or for academic referencing, without citation).

- Pupils/trainees will be made aware of the importance of referencing AI tools correctly when using AI tools to produce work, to allow teachers and assessors to review how AI has been used (cite date and name of the AI tools used/work generated).
- For any assessed tasks, pupils/trainees should retain a brief explanation of how AI has been used and a screenshot of any input/response (or other un-editable source).

## Identifying the misuse of AI tools

Staff will continue to use the skills and observation techniques already in use to assure themselves that pupils' work is authentically their own. They will be aware of and look out for potential indicators of AI use, which include, but are not limited to:

- **Inconsistent style or tone**: AI-generated text may display shifts in style, tone, or vocabulary that are unusual for the writer's typical work.
- **Lack of personal or contextual knowledge**: AI-generated content may lack specific, local, or topical knowledge, showing a general or generic approach rather than detailed, context-aware insights. It will not account for the subject knowledge of the individual using it.
- **Overuse of specific phrases or terminology**: AI tools might rely on repetitive phrases or technical jargon that are not appropriate for the intended audience or level of work.
- **Missing citations or references**: AI-generated content might lack proper citations or references, especially in academic or research contexts, or use references that are unverifiable.
- **Unusual formatting**: AI tools might produce content with abnormal structures, such as excessive concluding statements, repetitive sections, or unusual use of paragraphs.
- **Incorrect or confidently wrong information**: AI may confidently state incorrect facts or provide misleading information within otherwise coherent text.
- **Overly formal or complex language**: AI-generated text may use complex sentence structures or advanced vocabulary inappropriately, which could seem out of place for the level of the work.
- **Lack of depth or critical thinking**: AI might generate content that lacks the nuanced analysis or depth expected from a human expert, producing more generic or surface-level responses.
- **Absence of visual aids**: In assignments or reports where visual aids (graphs, charts, etc.) are usually expected, AI-generated content may lack these elements, even if they would enhance the quality of the work.
- **Errors in perspective**: AI tools may exhibit inconsistent use of first-person and third-person perspectives, especially when text has not been fully edited after being generated by the AI.
- **Outdated information**: AI tools may reference information that is outdated or lacks reference to recent events, reflecting the cutoff date of the AI's data source.
- **Over-reliance on common phrases**: AI-generated content often includes overused expressions or standard phrases, especially in essays or reports where originality is expected.

- **Overly generic responses**: The content may feel impersonal or overly broad, lacking the depth or specificity that would be expected from a human with experience or knowledge in the subject area.
- **Lack of engagement with the question or prompt**: AI may provide a response that doesn't directly address the specific question or prompt, reflecting the AI's tendency to generate general or tangential content.

Teaching staff/SCITT will employ various assessment methods to evaluate pupil/trainee 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.
- Through use of assessment strategies, staff can verify pupil/trainee comprehension beyond what AI tools can assess, promoting deep learning and authentic engagement.
- Allocating time for sufficient portions of assessed work to be completed under direct supervision (where appropriate).
- Examining intermediate stages in the production of assessed work to ensure that this is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages.
- Investigating any work that is suspected of being generated through misuse of AI tools.
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models.

Current AI detectors are not yet reliable enough to conclusively identify AI-generated text. They can give false positives, inaccurately flagging human-written text as AI, and can be biased against non-native English writers. Schools/the SCITT should not rely solely on AI detectors to detect academic misconduct. Where detectors are used, staff must be aware of their limitations, and transparent processes are needed to investigate flagged texts, given the chance of false positives. Assessment redesign should be prioritised over AI detection.

## Exams and assessments **(including SCITT assignments/professional development tasks)**

The school will follow published guidance by the Joint Council for Qualifications on AI use in assessments to support teachers and exam centres in protecting the integrity of qualifications. This guidance includes information on what counts as AI misuse and the requirements for teachers and exam centres to help prevent and detect malpractice.

Trainee teachers enrolled on a Post Graduate Certificate of Education (PGCE) must also follow the awarding University's policy.

Pupils/trainees will be made aware of consequences relating to inappropriate uses of AI tools and of the school's/SCITT's approach to plagiarism and malpractice. They will also be made aware of the risks of using AI tools to complete exams and assessments, which include:

- Submitting work that is incorrect or biased.

- Submitting work that provides dangerous and/or harmful answers.
- Submitting work that contains fake references.
- Failing to accurately reference content generated by AI.

Schools will ensure that pupils are issued with, and fully understand, the JCQ Information for Candidates. The school will also ensure that parents are informed of the risk of using AI tools, what constitutes as misuse, and the school's approach to malpractice.

Teachers, assessors and other relevant staff members will discuss the use of AI tools and agree a joint approach to managing trainee/pupil use of AI tools in the school/SCITT.

- Pupils/trainees will only be permitted to use AI tools to assist with assessments where the conditions of the assessment permit the use of the internet, and where they are able to demonstrate that the final submission is the product of their own independent work and thinking.
- Pupils/trainees will be made aware of the consequences of submitting a false declaration, and any AI misuse that is detected after a declaration has been signed will be reported to the relevant awarding organisation.
- The misuse of AI by pupils or trainees constitutes malpractice, as defined in the JCQ 'Suspected Malpractice: Policies and Procedures'. Pupils will be made aware that possible sanctions for committing malpractice through the misuse of AI tools include disqualification and debarment from taking qualifications for a number of years, and that their marks may also be affected. The school/SCITT will not, under any circumstances, accept work which is not a pupil's/trainee's own.

## Safeguarding

The school recognises that generative AI tools can produce harmful, inappropriate, or dangerous content. To prevent pupils from accessing such material, the school will adhere to the procedures outlined in the Safeguarding and Child Protection Policy, as well as the Online Safety Policy. The school will also ensure that parents are informed about who to contact regarding any concerns related to AI use.

Pupils will be educated on the risks associated with AI tools and taught how to use them safely. They will also be informed about how to report any concerns or incidents involving generative AI and know who to approach with any concerns.

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

## Monitoring, Review and Approval Process

South Farnham Educational Trust is committed to ensuring that the safe and effective use of Artificial Intelligence remains aligned with legal requirements, safeguarding expectations, and evolving educational practice. To maintain this, the Trust will implement the following monitoring, review, and approval processes:

**1. Ongoing Monitoring**

The Trust will continuously monitor:

- changes in AI technology and associated risks
- regulatory updates, including guidance from the ICO and the DfE
- emerging safeguarding considerations
- feedback from staff, students, and school leaders regarding AI use

Any significant updates in legislation, risk, or technology may trigger an earlier policy review.

**2. Annual Policy Review**

This policy will be formally reviewed **annually** by the Trust's Responsible AI Network in consultation with:

- the Data Protection Officer
- the CFOO
- school leaders and classroom practitioners

The review will ensure the policy remains current, practical, and reflective of best practice across the Trust.

**3. AI Tool Approval Process**

To ensure appropriate and safe use of AI solutions, the Trust will maintain a clear approval pathway for any AI tools used by staff or students. Each request will be sponsored by an identified Primary or Secondary AI Lead, who will act as the point of contact throughout the assessment process.

**Step 1 – Initial Request**

**Staff submit a request outlining**

- purpose of the tool
- expected benefits
- data involved (including whether personal data is processed)
- any potential risks or alternatives considered

**Step 2 – Digital/IT Team Triage**

South Farnham Education Trust IT Team (Eduthing) will assess:

- technical viability
- security and reliability of the supplier
- cost or licensing implications
- whether an approved tool already meets the need

**Step 3 – Data Protection and Safeguarding Assessment**

The Data Protection Lead and Officer will evaluate:

- compliance with data protection legislation
- data transfer, storage, and retention practices
- risks to users, including students
- whether a Data Protection Impact Assessment (DPIA) is required

Tools requiring student data or involving significant risk will undergo a full DPIA.

**Step 4 – Educational and Operational Review**

Relevant Trust leaders (e.g., Teaching & Learning, Operations) will consider:

- impact on teaching quality
- workload reduction
- alignment with Trust strategy
- training or support requirements

**Step 5 – Final Approval**

Final approval will be granted by the Responsible AI Network (Operation RAIN), acting as the Trust's designated authority for the oversight and governance of AI tools and practices.

Tools may be:

- **Approved**
- **Approved with restrictions** (e.g., no personal data input)
- **Declined**

Approved tools will be added to the Trust's official **Approved AI Tools Register**.

**4. Post-Approval Review**

All approved AI tools will be monitored for:

- changes to terms or privacy policies
- user feedback
- safeguarding or data protection concerns
- ongoing educational benefit

A tool may be restricted or withdrawn if it no longer meets Trust standards.

## SFET Approved AI Applications Matrix

| Application | Approval Category | Approval Notes / Restrictions | DPIA Status | AI Committee Decision | Trust Ratification Date |
|---|---|---|---|---|---|
| Microsoft Copilot (SFET Login) | Approved | Enterprise protections in place within SFET tenancy mean this application can be used, including with identifying data. Users should remain mindful that SARs may extend to Copilot usage. | Complete | Approve | 23/09/2026 |
| Microsoft Copilot (Personal Login) | Approved with Restriction | No personal or identifying data relating to SFET or its schools may be used. | Complete | Approve with restrictions | 23/09/2026 |
| Bromcom AI | Approved | Integrated within the Bromcom MIS platform. | Complete | Approve | 23/09/2026 |
| Canva (SFET Login) | Approved | Enterprise protections are in place. Users must ensure uploaded images comply with policy. | Complete | Approve | 23/09/2026 |
| TeachMateAI | Approved with Restriction | No personal or identifying | Complete | Approve with restrictions | 23/09/2026 |

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| | | data. Generic resources only. | | | |
| The Key AI | Approved with Restriction | No personal or identifying data may be used. Verify outputs carefully. | Complete | Approve with restrictions | 23/09/2026 |
| SLT AI | Approved with Restriction | No personal or identifying data may be used. | Complete | Approve with restrictions | 23/09/2026 |
| NotebookLM (SFET Google Login) | Approved | Enterprise protections allow use with identifying data. | Complete | Approve | 23/09/2026 |
| NotebookLM (Personal Login) | Approved with Restriction | No personal or identifying data may be used. | Complete | Approve with restrictions | 23/09/2026 |
| ChatGPT | Approved with Restriction | No personal or identifying data may be used. Model training settings must be disabled. | Complete | Approve with restrictions | 23/09/2026 |
| Adobe (SFET Login) | Approved | Enterprise protections are in place. | Complete | Approve | 23/09/2026 |
| Claude AI (SFET Login) | Approved | Enterprise protections allow use with identifying data. | Complete | Approve | 23/09/2026 |
| Claude AI (Personal Login) | Approved with Restriction | No personal or identifying | Complete | Approve with restrictions | 23/09/2026 |

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| | | data may be used. | | | |