



AI and Emerging Technologies Policy

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AI and Emerging Technologies Policy

1. Aims

Aspire Multi-Academy Trust (Aspire MAT) recognises the potential benefits of Artificial Intelligence (AI) and emerging technologies in enhancing teaching, learning, and operational efficiency. This policy ensures their safe, ethical, and lawful use across all Aspire academies and central functions.

This policy is aligned with the Aspire Data Protection Policy and statutory obligations to protect the rights and freedoms of individuals under UK law.

It has been created to ensure the safe, ethical, and legal use of AI across Aspire MAT, enhancing learning, supporting staff workload, and protecting all members of our school community.

Key Commitments:

- No personal or sensitive data input into unauthorised AI tools.
- DPIAs required for all AI tools processing personal data.
- Authorised AI tools must be listed in a school-level register.
- Staff must retain professional responsibility for all AI-generated output.
- AI must never replace human safeguarding judgement or decision-making.
- AI education integrated into curriculum to build pupil literacy and safety.

Applicability:

- All Aspire primary schools and central teams
- All staff, pupils, contractors, governors, volunteers, and third-party partners

2. Legislation and guidance

This policy meets the requirements of:

- the UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#) and
- [Data Protection Act 2018 \(DPA 2018\)](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)
- [Education and Inspections Act 2006](#)
- [Department for Education guidance on generative AI in education](#)
- [ICO guidance on the use of AI and personal data](#)
- [Keeping Children Safe in Education](#) (KCSIE)
- [Children and Families Act 2014](#)

3. Definitions

Term	Definition
Artificial Intelligence (AI)	Artificial Intelligence refers to computer systems or software that are capable of performing tasks normally requiring human intelligence. This includes but is not limited to tasks such as problem-solving, decision-making, speech recognition, natural language processing, machine learning, and pattern detection. AI can be used to automate processes, enhance data analysis, and support decision-making within educational and administrative contexts.
Generative AI	Generative AI is a branch of artificial intelligence that enables machines to create new content such as text, images, audio, video, or code. These systems are trained on large datasets and can generate outputs that mimic human-created content. Examples include tools like ChatGPT, Google Gemini, Microsoft Copilot, and image generators like DALL·E or Canva AI. While useful for drafting materials or personalising content, generative AI may also produce biased, incorrect, or misleading information and must be used with care.
Authorised AI Tools	These are AI-based applications or systems that have been reviewed and approved by the Trust or school following a AI Data Protection Impact Assessment (DPIA) and any relevant safeguarding checks. Authorisation is required for any AI tool that processes, stores, or interacts with pupil, staff, or Trust-related data. Unauthorised AI tools must not be used for professional or educational purposes.
AI Hallucination	A term used to describe false or misleading information generated by an AI tool. AI systems, particularly generative models, may produce inaccurate or entirely fabricated content that appears credible but is factually incorrect. Staff must carefully review and verify all AI-generated content before use or publication.
Bias in AI	Bias refers to unintended or systematic errors in the AI tool's outcomes that may reflect or reinforce harmful stereotypes or unfair treatment of individuals or groups. AI bias can stem from training data or model design. Schools must consider equality impacts when using AI tools, particularly in recruitment, assessment, or pupil behaviour analysis.
Machine Learning	A type of AI that enables systems to learn and improve from data without being explicitly programmed. In educational settings, machine learning might be used to predict student outcomes or personalise learning pathways, but must be used responsibly to avoid profiling or unjustified assumptions.
Personal data	Any information relating to an identified, or identifiable, individual. This may include the individual's: • Name (including initials) • Identification number • Location data • Online identifier, such as a username It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Special categories of personal data	Personal data which is more sensitive and so needs more protection, including information about an individual's: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetics • Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes • Health – physical or mental • Sex life or sexual orientation
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4. Scope and Application

This policy applies to:

- All staff, trustees, governors, contractors, consultants, and volunteers
- All pupils using Trust systems or Trust-approved tools
- All Aspire schools and central teams
- Both Trust-owned and personal devices used for Trust work

Each school must designate a named individual responsible for AI oversight (either the DPO or IT Lead).

5. Roles and responsibilities

- **Board of Trustees:** Ensures the Trust complies with its legal obligations.
- **School Headteachers:** Act as the data controller's representative on-site.
- **Named School AI Lead:** Oversees compliance, training, and DPIAs at school level.
- **All Staff:** Ensure responsible and lawful use of AI and report breaches.

6. Principles for the use of AI

- Transparency and fairness
- Human oversight and accountability
- Respect for privacy and individual rights
- Promotion of educational and operational benefit
- Regular review of ethical implications

This policy sets out how Aspire academies aim to comply with these principles.

7. Authorised AI Tools

All AI tools must be approved via a Data Protection Impact Assessment (DPIA) before use.

Please see the Aspire Data Protection Policy for full details of how to undertake a DPIA and roles and responsibilities.

Schools must maintain an AI Tools Register (Appendix A).

Authorised tools may include:

- Microsoft Copilot

- Google Gemini
- MIS AI functions
- Educational AI tools
- AI Notetaker apps (with consent)

8. Use of AI by Staff

- Staff must not input personal, sensitive, or confidential data into unauthorised tools.
- AI must not replace strategic decisions or human safeguarding judgement.
- AI outputs must be reviewed and validated before use.
- AI notetakers must not be used without prior DPIA and consent of attendees.

9. Use of AI by Pupils

- Pupils must only use authorised tools under staff supervision.
- Pupils must not enter personal information into AI tools.
- AI use must support learning and critical thinking, not replace it.
- Staff will monitor for misuse or academic dishonesty.

10. Ethical and Responsible Use

- Staff and pupils will be informed in responsible AI use.
- Content from AI tools will be reviewed for bias and misinformation.
- AI will not be used to generate emotion-recognition or profiling data.
- Environmental impacts will be considered when using AI.
- Staff and pupils to access training appropriate to their role on the safe and responsibly use of AI, including how to recognise risk, evaluate outputs and raise concerns.

11. Data Protection and Privacy

Where personal data is processed by AI tools, Aspire MAT recognises that it remains the data controller under UK GDPR and is fully accountable for any resulting processing outcomes

- Aspire academies AI use must comply with the Trust's Data Protection Policy.
- A DPIA is required where AI tools process personal data.
- Staff and pupils must understand how their data may be used.

Please refer to the Aspire MAT Data Protection Policy for detailed process in relation to DPIA's.

12. Cyber Security and Technical Safety

- All AI tools must meet Trust and DFE security standards.
- Schools will implement access controls and incident response measures.
- Suspected AI-based cyber threats (e.g. deepfakes) will be reported and investigated.

13. Monitoring and Review

- School AI Leads and the Trust OHRO will monitor this policy.
- This policy will be reviewed annually in line with the Data Protection Policy.
- Updates will reflect legal, technical, and educational changes.

Appendices: A, B, C and D - School-Level AI Templates

Each Aspire school must maintain a register of all AI tools in use, including:

Appendix A: AI Tools Register

Appendix B: AI DPIA template

Appendix C: AI Staff checklist

Appendix D: AI Use Log

Templates of required documentation can be located by clicking [here](#).

Appendix C: AI basic Risk and Compliance Checklist

Before using an AI tool, staff must consider the following:

- ☒ Is the tool listed on your school's AI Tool Register?
- ☒ Has a DPIA been completed and approved for this tool?
- ☒ Are you avoiding entering personal, sensitive, or identifiable data?
- ☒ Are you reviewing all AI-generated content for accuracy and bias?
- ☒ Are you avoiding using AI to make safeguarding or HR decisions?
- ☒ Have you explained to pupils (if applicable) how and why AI is being used?
- ☒ Do not use free or experimental tools without authorisation.
- ☒ Do not use AI to automate assessments, referrals, or exclusions.
- ☒ Do not allow pupils to input their personal data into AI tools.