AI (Artificial Intelligence) Policy

Our Mission

At Cornwall Education Learning Trust (CELT), our mission is clear: to provide every learner with an **exceptional educational experience.** One that enables them to thrive, achieve and succeed in life. We believe in a **100%** mindset, that every learner, in every classroom, in every school, deserves the very best we can offer. For us, 100% means no compromise: no learner left behind, no community overlooked, and no opportunity wasted.

Our strategic goals reflect this ambition. We are committed to empowering and growing our people, building an ambitious all-through entitlement, forging exceptional relationships with our communities, transforming provision through meaningful partnerships, and leading an ethical, effective and innovative organisation. These are not just aspirations; they are promises that shape the way we work and the culture we are building together.

Our Values

Our values are at the heart of everything we do. We believe in the power of **Collaboration**, building strong relationships and working together as one team to achieve our collective goals. We are committed to **Empowerment**, creating a culture where initiative, innovation and trust flourish, and where every individual feels valued, respected and motivated.

As a Trust, we are grounded in promoting **Leadership**, sharing a moral and ethical purpose to improve the lives of others and make a lasting difference for our learners and communities. And we embrace **Transformation**, approaching change positively so that we can all become our best selves and do our best work.

These values guide every decision we make and every action we take. They are the foundation of our Trust and the reason we can offer such exceptional opportunities for our learners and staff. If you choose to join CELT, you will be part of a values-driven organisation where people are supported to grow, contribute, and thrive.

Policy Contents

Policy Approval and Review

Policy Version Number:	1.0
Approved By:	Resources and Infrastructure
Approved On (Date):	17.11.2025
Review Period:	Biannually
Policy Lead:	Information Services Lead

Policy Version History

Policy Version	Date Issued	Summary of Changes
1		First Issue – No Changes

1. Introduction This policy relates to all schools under the remit of Cornwall Education Learning Trust and should be read in conjunction with, amongst others, the following policies and documents:

- Online Safety Policy

- CELT Code of Conduct

- CELT Safeguarding and Child Protection Policy

- CELT IT Acceptable Use Policy

- Data Protection Policy

- School's / Cornwall Education Learning Trust Privacy Notices (workforce, students, recruitment)

As a trust, we use AI tools to support our students' learning experience. We are committed to maintaining data subjects' trust by protecting personal data. This policy explains how we plan to partner with various AI tools to augment our students' educational experience. It is critical that all users read and understand this document and make themselves aware of the risks and exposure involved. A user should contact helpesk@celtrust.org and raise a ticket if they are unclear about any requirements in this policy and a member of the Data Governance team will respond to you.

2. Aims and Scope Here at CELT, we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customize learning experiences, and progress educational innovation. We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding, and compliance with wider legal obligations. Therefore, the aim of this policy is to establish guidelines for the ethical, secure, and responsible use of AI technologies across our whole school community. This policy covers the use of AI tools by school staff, governors, and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning

- Support staff to explore AI solutions to improve efficiency and reduce workload

- Prepare staff, governors, and pupils for a future in which AI technology will be an integral part

- Promote equity in education by using AI to address learning gaps and provide personalized support

- Ensure that AI technologies are used ethically and responsibly by all staff, governors, and pupils

- Protect the privacy and personal data of staff, governors, and pupils in compliance with the UK GDPR

3. Definitions This policy refers to both 'open' and 'closed' generative AI tools. These are defined as follows:

- **Open generative AI tools** are accessible and modifiable by anyone. They may store, share, or learn from the information entered into them, including personal or sensitive information.

- **Closed generative AI tools** are generally more secure, as external parties cannot access the data you input.

4. Legislation This policy reflects good practice guidelines/recommendations in the following publications:

- AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence

- Generative artificial intelligence (AI) and data protection in schools, published by the Department for Education (DfE)

This policy also 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

- Data Protection Act 2018 (DPA 2018)

- Data Use and Access Act 2025

5. Regulatory Principles We follow the 5 principles set out in the AI regulation white paper.

Regulatory principle	We will...
Safety, security, and robustness	Ensure that AI solutions are secure and safe for users and protect users' data. Ensure we can identify and rectify bias or error. Anticipate threats such as hacking.
Appropriate transparency and explainability	Be transparent about our use of AI, and make sure we understand the suggestions it makes.
Fairness	Only use AI solutions that are ethically appropriate, equitable, and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely, and correct problems where appropriate.
Accountability and governance	Ensure that the governing board and staff have clear roles and responsibilities

	in relation to the monitoring, evaluation, maintenance, and use of AI.
Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology. Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.

6. Roles and Responsibilities

6.1 AI Lead The member of the ELT with AI lead responsibility is Doug O'Brien. They are responsible for the day-to-day leadership, ownership, and management of AI use across CELT.

6.2 Trustee Board

The Trustee board will:

- Take overall responsibility for monitoring this policy and holding the AI Lead to account for its implementation in line with the trust's AI strategy.

- Ensure the AI lead is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the trust and its schools.

- Adhere to the guidelines below to protect data when using generative AI tools:

    o Use only approved AI tools (see section 7)

    o Seek advice from the data governance team / IS team / AI lead, as appropriate

    o Check whether they are using an open or closed generative AI tool

    o Ensure there is no identifiable information included in what they put into open generative AI tools

    o Acknowledge or reference the use of generative AI in their work

    o Fact-check results to make sure the information is accurate

6.3 Headteacher The headteacher will:

- Take responsibility for the day-to-day leadership and management of AI use in the school

- Liaise with the data governance team to ensure that the use of AI is in accordance with data protection legislation

- Ensure that the guidance set out in this policy is followed by all staff

- Ensure staff are appropriately trained in the effective use and potential risks of AI

- Make sure pupils are taught about the effective use and potential risks of AI

- Sign off on approved uses of AI, or new AI tools, taking into account advice from the Data Governance team, AI lead, and data by completing data protection impact assessments

6.4 Data Governance Team

The data governance team is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI. They can be contacted via heldesk@celtrust.org

- The data governance team will sign off on approved uses of AI, or new AI tools, taking into account data protection advice and data protection impact assessments in consultation with the AI Lead.

6.5 Inclusion Lead

The Inclusion lead is responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI

- Updating and delivering staff training on AI safeguarding threats

- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE)

6.6 All Staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy. To protect data when using generative AI tools, staff must:

- Use only approved AI tools (see section 7)

- Seek advice from the data governance team / IS team/ AI lead, as appropriate

- Check whether they are using an open or closed generative AI tool

- Ensure there is no identifiable information included in what they put into open generative AI tools

- Fact-check results to make sure the information is accurate

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. All of our staff have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

6.7 Pupils

Pupils must follow the guidelines set out in section 9 of this policy ('Use of AI by pupils').

7. Staff and Trustees and Governors Use of AI

7.1 Approved Use of AI

We are committed to helping staff and governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete but cannot replace the judgment and knowledge of a human expert. Whatever tools or resources are used to produce plans, policies, or documents, the quality and content of the final document remain the professional responsibility of the person who produced it. Any member of staff or governor using an AI-generated plan, policy, or document should only share the AI-generated content with other members of staff or governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it. Always consider whether AI is the right tool to use. Just because the trust has approved its use doesn't mean it will always be appropriate.

7.2 Process for Approval Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. Staff should contact the trust AI Lead to discuss any ideas they may have with regards to using AI, so these suggestions can be taken forward if they deem it to be a satisfactory new method of working. The AI Lead is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the data governance team and data protection impact assessments.

7.3 Data Protection and Privacy To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots. If personal and/or sensitive data is entered into an unauthorised generative AI tool, CELT will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy. Please also refer to section 12 of this policy.

7.4 Intellectual Property Most generative AI tools use inputs submitted by users to train and refine their models. Pupils own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple-choice questions. Pupils' work must not be used by staff to train generative AI models without appropriate consent or exemption to copyright. Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

7.5 Bias We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race, and disability. This means that critical thought must be applied to all outputs of authorized AI applications. This means fact and sense-checking the output before relying on it. We will ensure we can identify and rectify bias or error by training staff in this area. We also regularly review our use of AI to identify and correct any biases that may arise. If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.

7.6 Raising Concerns We encourage staff and governors to speak to their headteacher or services lead in the first instance if they have any concerns about a proposed use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

7.7 Ethical and Responsible Use We will always:

- Use generative AI tools ethically and responsibly and with due regard to equality laws

- Consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output

- Fact and sense-check the output before relying on it

Staff, trustees and governors must not:

- Generate content to impersonate, bully, or harass another person

- Generate explicit or offensive content

- Input offensive, discriminatory, or inappropriate content as a prompt

8. Educating Pupils about AI

At CELT, we acknowledge that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI. Pupils are taught in our curriculum about the potential benefits of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly

- The limitations, reliability, and potential bias of generative AI

- How information on the internet is organised and ranked

- Online safety to protect against harmful or misleading content

9. Use of AI by Pupils

We recognise that AI has many uses to help pupils learn. Pupils may use AI tools:

- As a research tool to help them find out about new topics and ideas

- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs. AI may also lend itself to cheating and plagiarism. To mitigate this, pupils may not use AI tools:

- During assessments, including internal and external assessments, and coursework

- To write their homework or class assignments, where AI-generated text is presented as their own work

- To complete their homework, where AI is used to answer questions set and is presented as their own work (for example, maths calculations)

This list of AI misuse is not exhaustive. Where AI tools have been used as a source of information, pupils should reference their use of AI. The reference must show the name of the AI source and

the date the content was generated. We consider any unattributed use of AI-generated text or imagery to be plagiarism. (cross reference homework policy / assessment policy – Action DOB)

Pupils must consider what is ethical and appropriate in their use of AI and must not:

- Generate content to impersonate, bully, or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory, or inappropriate content as a prompt

10. Formal Assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments.

11. Staff Training

Staff will be provided regular training in the use of AI. Examples of mechanisms of staff training include, but are not limited to:

- INSET/Orientation/Training Days
- Learning and teaching sessions or staff twilight sessions)
- A repository of AI resources on [Revised CELT HUB]
- Heads of Department meetings
- Departmental meetings

Examples of mechanisms of student training include, but are not limited to:

- Assemblies (both whole-School and year-group-specific)
- PSHE lessons
- Computer Science lessons
- Reminders in individual subject lessons as and when appropriate (for example, when embarking on a piece of coursework)

Training topics of relevance to both students and staff include, but are not limited to:

- Deciding on a particular tool to use
- Crafting appropriate prompts
- Ethics
- Referencing
- Data protection considerations

- Safeguarding considerations

- Updates to the functionality of existing tools

- Introduction to new tools

12. Breach of Policy

12.1 By Staff, Governors and Trustees

Breach of this policy will be dealt with in line with our code of conduct. Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- During or outside of working hours

- On an individual's own device or a school device

- At home, at school, or from a remote working location

Staff, governors and trustees will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing us with access to:

- The generative AI application in question (whether or not it is one authorized by the trust)

- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to Clare Ridehalgh, Deputy Trust Lead immediately.

12.2 By Pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy

13. Monitoring and Transparency

AI technology, and the benefits, risks, and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by the AI Lead whenever there is a significant change to either AI use by the school or the associated risks of AI usage. This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements, and changes in regulations. All staff are expected to read and follow this policy. The AI Lead will monitor the effectiveness of AI usage across the school. We will ensure we keep members of the school community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers, and staff will be considered in the ongoing evaluation and development of AI use in school.

14. Links with Other Policies This AI policy is linked to our:

- Data protection policy

- Assessment policy

- Exams policy

- Homework policy

- Behaviour policy

- Staff code of conduct

- Marking and feedback policy

- ICT acceptable use policy

- Online safety policy

Approved AI Tools

Approved tools	Approved uses
KeyGPT (closed generative AI tool)	- Letter to parents/carers - Job descriptions and adverts - Interview questions
Oak Academy AI lesson planner	Lesson planning