Four Cs
Multi-Academy Trust



AI Policy for Staff

Presented to:

Full Trustees

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AI Policy for Staff

1.0 Introduction

This policy sets out a Four Cs MAT Trust approach to encourage the safe, ethical, and effective use of Artificial Intelligence (AI) across both primary and secondary phases. The Trust recognises the potential of AI to enhance teaching, learning, leadership, and administrative efficiency, while also acknowledging the associated risks relating to safeguarding, data protection, bias, intellectual property, and ethical use.

As a Trust, we recognise that AI will always be used to **complement**, **not replace**, professional judgement, human decision-making or high-quality teaching. **Safeguarding, wellbeing, and data privacy remain paramount when using AI tools. Staff retain full professional responsibility for all AI-assisted decisions and for all content produced with AI assistance before it is published, shared, or relied upon.**

2.0 Objectives

2.1 The objectives of this policy are to:

- Encourage the safe use of AI to reduce staff workload while maintaining professional accountability.
- To monitor and filter the use of AI Tools and subsequently provide the Trust with the authority to decide if an AI Tool can or cannot be used.
- To ensure the Trust takes the necessary steps to regulate how AI is approved and used through:
    - Promoting safe, ethical, and appropriate use of AI.
    - Protecting personal data and intellectual property.
    - Ensuring transparency and accountability in AI use.
    - Preparing pupils / students for a future in which AI is increasingly prevalent.
    - Mitigating the potential harm to pupils/students cognitively, emotionally, or socially by only using DfE approved AI tools that meet the current product safety standards.
    - Ensure equality of access and inclusion.

3.0 Explanation of terms used in this policy

3.1 Artificial Intelligence (AI)
Is the use of computer systems to solve problems and make decisions. It is already a part of everyday life, for example, personalised suggestions on social media, shopping sites or route-planning apps, facial recognition, screening job applications etc.

3.2 Generative Artificial Intelligence (AI)
Generative AI takes a written prompt and runs it through an algorithm to generate new, 'natural'-seeming content – ie that seems like it was created by a person, not a computer. AI software uses models to generate text, images, videos, audio, software code or other forms of data (including podcast style audio, infographics, flash card tools). These models learn the underlying patterns and structures of their training data and use them to generate new data in response to input, which often takes the form of natural language prompts. Examples are ChatGPT, Google Gemini, Microsoft Copilot and Canva. Increasingly Generative AI is becoming embedded in other tools and software.

3.3 Analytical Artificial Intelligence (AAI)
Online learning and diagnostic software that uses traditional machine learning which analyses data rather than online learning and diagnostic software that uses traditional machine learning which analyses data rather than generating new content, with the aim of

finding patterns and making predictions such as that used in adaptative learning tools like Sparx, CenturyTech or TT Rock Stars. AAI also includes MIS tools and SISRA which can use data to flag students at risk of persistent absence, underachievement etc.

*These are not exhaustive examples please refer to pages appendices B and C of this policy document

3.4 Open and Public AI Tools:
These are tools accessed via openly via the Internet (possibly with subscriptions with or without involved). There is no Data Processing Agreement and DPO-approved DPIA are in place, the inputting of personal data of any description is strictly prohibited. This prohibition is absolute.

Closed AI systems
Are defined as a software tool that operates entirely inside a restricted, corporate environment. The AI system used has no ability to share information with the public or across the Internet to other users.

It is important to state that even within closed AI systems there is a community that it shares the information with. Therefore, the same cautionary GDPR regulations apply as stated in the policy to open AI (generative) system.

4.0 Compliance criteria for approving AI Tools (pupils and staff)

The Trust will **only** approve the use of any AI software based on five fundamental compliances. **These are non-negotiable compliance criteria.**

4.1 **UK GDPR and copyright compliance**. A DPIA may be required of an AI/tool/app software provider if they do not provide this either as part of their terms and conditions, or, on request prior to procuring the software or need to be completed and submitted to the Data Protection Officer (DPO) for final approval. This process will involve staff conversant in completing this process and not the user requesting the use of AI software.

4.2 The most up-to-date **DfE Generative AI product safety** standards. For **pupils / students,** the AI software **must log**, **monitor and filter** their use of AI software before it can be approved.

4.3 The most up-to-date **KCSIE** (safeguarding) guidance. The approval of the Trust Safeguarding Lead may need to be sought when the half term review of request for AI approval takes place.

4.4 The most up-to-date **JCQ examination board guidance**.

4.5 There will be ongoing training and awareness of potential risks carried out by trained staff within the Trust to ensure staff and pupil / student awareness of AI benefits and risks are highlighted to ensure we are all compliant.

5.0 Compliance criteria explained:

5.1 AI software must comply with UK GDPR

This fundamental relates to the risk of sensitive personal data held by the Trust being input and exposed into AI systems and subsequently being exposed by unauthorised users.

Personal data is defined as information that relates to an identified or identifiable living individual (eg pupils / students, staff or parent / carers). T**he inputting of personal data is not allowed.**

Amplification of personal data, according to the Information Commissioner's Office (ICO) includes:

- identity details (for example, a name, title or role)
- contact details (for example, an address or a telephone number)
- information about pupil / student behaviour and attendance
- assessment and exam results
- staff recruitment information
- staff contracts
- staff development reviews
- staff and pupil / student references
- transcription of any meetings held by the school (eg Governors, Staff Trust or line management meetings) [*1]

The list above is not an exhaustive one and appropriate Trust wide approval must be sought via a Data Protection Risk Assessment (DPIA) via the Trust's MAT DPO before any AI system/app/software can be purchased across the Trust.

[*1] Whilst the Trust recognises that external agencies may use AI transcription software, the Trust reserves the right to review if this may be allowed under the same principles and procedures of authorising AI software within the Trust. Equally, staff should check before any recording takes place, if the AI transcription service is a closed one and have assurances through the meeting holder that it complies with GDPR before being allowed to be recorded.

5.2 To limit copyright and ethical infringements

All users (all staff and pupils / students) using AI to generate content will be required to consider blatant and deliberate violations of **copyright**, **accuracy, bias, and appropriateness**.

- An example of **copyright** infringement could be adding music or images to a public presentation or re-using published content in an internal or external presentation/social media or other online sources and claiming it to be your own work. Staff should familiarise themselves with the UK Copyright Law (including downloading copyrighted content). Whilst the Copyright law is challenging, the Trust expects staff to be considerate of this when producing material content from sources generated by others.
- An example of an AI '**hallucination'** is when an AI software produces results that appears it could be true, but it is not all factually true. It also covers the aspect of checking for **accuracy**. For example, the body of the response is correct but there are factual date or event errors in the timeline provided.
- An example of **bias** is where an AI output may reinforce harmful stereotypes or favour certain perspectives as fact such as historical and current events or controversial issues. These dangers can be compounded by **hallucinations**. where the AI tool/app/ only provides a one-dimension aspect of, for example, a key historical event, religious interpretation which could lead to major implications if shared.
- Staff in secondary and Post16 settings must adhere to **JCQ 'AI Use in assessment'** guidelines (alongside examination board subject based guidance) and ensure that pupils / students are provided with these guidelines when preparing pupils / students for assessment and when also the marking of assessments that are a requirement of the subject specification.
- Staff to ensure AI software does not reinforce **discrimination**, **misinformation** (sharing false or misleading information without a malicious intent) or **disinformation** (deliberate sharing of false or malicious information including images and false news with an intent). Staff are obliged to educate pupils / students to be curious and not to default to the acceptance that the output of AI generated information is always correct for these reasons shared in this policy.
- **Staff to retain responsibility for all final decisions and materials to be published within and outside their settings for the above reasons.**

5.3 To avoid safeguarding concerns (KCSIE)

- KCSIE 2026 expands on the 'Four Cs of online safeguarding' (content, contact, conduct and commerce) to stress the importance of challenging not just extremism, but also "misinformation, disinformation, fake news and conspiracy theories."
- With the growth of generative AI software to manipulate images uploaded onto websites, social media and online software, the Trust is committed to providing further guidance on the risks of uploading images/videos etc, to avoid manipulation by unscrupulous sources (eg '**Deep Faking'**).
- To always follow the Trust Staff Code of Conduct Policy when communicating with pupils / students, parents / carers or indeed other professionals

As per the Trust's approved list of AI software, pupils / students **under the age of 13** will be prevented to engage in AI software **within their educational setting** within their educational setting under UK GDPR and current DfE safety standards on generative AI use in education.

5.4 The Trust has a clear process which it will follow to either approve or deny staff/pupil access to AI software based on the compliance criteria listed in Appendix A of this policy.

6.0 POLICY REVIEW

6.1 The Trustees (or responsible committee) will review this policy in line with the procedure for policy review.

6.2 Date for Review

If there is no other reason for a review, this policy will be reviewed **annually** by the Trust.

Appendix A – Rationale and processes for approving AI Tools (pupils and staff)

Approval criteria
The Four Cs MAT will **only** approve the use of any AI software based on five fundamental compliances as outline in section 4 of the policy. These are: 1. UK GDPR, Data Protection risk assessment and compliance. A DPIA may be requested from the software vendor or need to be completed and submitted to the DPO prior to approval. 2. The most up-to-date DfE Generative AI product safety checklists. **For pupils, the AI software must log, monitor and filter their use of AI software before it can be approved.** 3. The most up-to-date KCSIE (safeguarding) guidance. The approval of the Four Cs MAT Safeguarding Lead may need to therefore be sought. 4. The most up-to-date JCQ examination board guidance. 5. There will be ongoing training and awareness of potential risks carried out by trained staff within the Four Cs MAT to ensure staff and pupil awareness of AI benefits and risks are highlighted to ensure we are all compliant.
Processes for approval explained

The process for AI approval within the Trust is as follows:
 	
• Staff are welcome to suggest new ways of using AI to improve pupil / student outcomes and reduce workload. They should inform their senior leader of any new requests they may have with regards to using AI, so the schools in the Trust can be fully informed of the benefits and risks if they deem it to be a satisfactory new method of working.
 	
• Requests for using AI Tools (currently not on the approved list – see appendix B) **can only** be received by raising a ticket request on the Trust's IT Support sites. This can be accessed in the following ways:
  ○ **support@fourcsmat.org.uk** (all schools except KSA).
  ○ or, Ken Stimpson Academy: **ITServicedesk@kenstimpson.org.uk**
  ○ The request will require the full name of the AI Tool, whether it is for staff use, or for pupil / student-facing purposes, and the website URL. **No other request method is permitted.**
 	
• A nominated (trained member of staff) appointed by the Trust will be responsible for signing off on approved uses of AI, or new AI tools, considering the advice from the Trust Leads, (IT Manager and Safeguarding Lead) and the Data Protection Officer (with data protection impact assessments DPIA in place).
 	
• Any queries regarding the safe use of AI software should only be **logged as a ticket on the IT desk and not as an email query.**
 	
• The approved list will be reviewed on a half termly basis and if necessary, communicated to all staff accordingly.
 	
• The Trust will carry out a Data Protection Impact Assessment (DPIA) on any AI tool/software/app requested to be approved. The Trust will keep a central list of DPIA approved software for schools in the Trust so it can be easily referenced before using any AI software. This register will be based on ICO and DPIA guidance.

Appendix B – Current Four Cs MAT Approved list of software (pupils and all staff and Four Cs MAT)

Any authorised AI software within the Four Cs MAT must first comply with the Data Protection Act 2018 and UK GDPR before it can be considered as being on the approved list.

The Trust recognises that whilst the new DfE standards are emerging, there will be a need to regularly review them, considering, ongoing industry development and to approve/remove AI products accordingly.

A	**Pupils at secondary and post 16 level**
1	**Microsoft CoPilot** **Notes:** • Microsoft CoPilot is currently the only product that allows the Trust to log, monitor and filter pupil / student usage. As there are two versions of the product the Trust will ensure only the correct version of Microsoft CoPilot is available to staff and pupils through its own IT filtering systems. • Microsoft CoPilot is currently age restricted by Microsoft and the DfE for pupils / students who are aged **13 years old** and above. • The embedded AI functionality within Microsoft Bing and Google search results (such as Gemini) are currently restricted for **all** pupils / students across the Trust until further notice due the inability to meet DFE AI standards, and safeguarding standards. • The Trust will endeavour to restrict the access to staff and pupils / students only to the Microsoft 365 CoPilot edition to ensure that personal data belonging to the Trust is not unnecessarily exposed to wider audiences.
B	**Children at primary level**
	• All restrictions listed above are also in place for primary aged children. • Children are restricted to only online learning platforms that are age appropriate and do not allow them to engage in unregulated chat with other children or staff or unknown individuals.
C	**All Staff, including the Trust permission to use AI generative software** The Trust requires staff to understand that there is no current technology capable of **auditing** and **filtering** the use of software listed and still requires future enhancements to fully meet DfE AI generative current and future standards. The DfE AI Generative standards require staff to be filtered and monitored in accordance with GDPR and KCSIE guidelines. **This is different to pupil / student access to generative AI software/apps/tools for pupils / students (regardless of their age) in educational settings.** This list of approved apps/tools/software will be regularly reviewed as explained in this policy. Members of staff are permitted to use them in their professional capacity only if they **apply and abide by the guidance listed on pages 2-4**.
	1. **Microsoft Copilot*** – standalone app and integrated into Word, PPT, Outlook, Excel and Teams. 2. **Canva** (and other versions) – Trust approved only through an academy or Trust wide licence being procured. **Please be aware of the Trust's direction of uploading images and personal information.**

	3. **Claude (Anthropic)** – known for higher "nuance" in writing and long document analysis. 4. **Humata / ChatPDF** – tools that allow users to "chat" with specific textbooks or long curriculum PDFs to find information quickly. 5. **MagicSchool.ai** – a comprehensive suite for teachers including IEP (Individualised Education Program) generators, rubric builders, and "re-levelling" tools to simplify text for lower reading ages. 6. **Brisk Teaching** – a Chrome extension that allows teachers to provide AI-assisted feedback directly within Google Docs and change the reading level of any website. 7. **Curipod** – uses AI to generate interactive slide decks and polls in seconds based on a lesson topic.
D	**Analytical AI Software (online learning platforms and Management Information Systems)**
	The following AI Tools are permitted to be used as they apply and abide by the guidance listed in this policy The principle of approval **in this situation** is around ensuring the software meets **UK GDPR regulations through DPIAs being either submitted by the software company or by the Trust and approved by the Trust's DPO.** This list of approved apps/tools/software will be regularly review as explained in this policy. Staff are professionally permitted to use them only if they **apply and abide by the guidance listed in this policy.**
	1. **Bromcom** and its AI functionality – a Trust wide MIS with a DPIA approved by the DPO. 2. **SISRA** – an examination analysis software tool. 3. **GL Assessment software** – a student diagnostic set of tools and AI generated predictions against national benchmarks. 4. **Photomath / Socratic** (for STEM) – uses computer vision to solve math problems and explain steps. 5. **Seneca Learning** – uses AI-driven algorithms to determine when a pupil / student is likely to forget a topic and re-tests them at the optimal time (Spaced Repetition). 6. **Sparx Maths / Sparx Reader/Sparx Science** – widely used in the UK; uses AI to set "attainable" homework that adapts to each child's speed and accuracy. 7. **CENTURY Tech** – a UK-based platform using AI and neuroscience to provide "nuggets" of learning that adapt based on pupil / student's gaps in knowledge (KS3/GCSE/A-Level). 8. **Khanmigo (Khan Academy)** – an AI tutor that doesn't give the answer but acts as a Socratic guide, helping students think through problems. 9. **GitHub Copilot** (for Computer Science) – AI coding assistant often discussed in KS4/5 Computer Science policies. 10. **Aila (Oak National Academy)** – a UK-government-backed AI lesson assistant that creates high-quality, curriculum-aligned resources.