East Midlands Academy Trust

Artificial Intelligence Policy 2025-2026

'Every child deserves to be the best they can be'

Inclusion Innovation Impact

3.

Scope: East Midlands Academy Trust & All Academies within the Trust	
Version: 1	**Filename:** EMAT Artificial Intelligence Policy
Approval: December 2025	**Next Review: December 2026** This policy will be reviewed annually by the owner and approved by the CEO.
Owner: Head of Shared Services	

Revision History

Revision Date	Revisor	Description of Revision
Dec 2025 V1	DU	Minor update to reflect feedback from exams officers and Head of People & Culture Exams/Malpractice policy referenced in section 2.7 Consequences section added to policy References to KCSIE 2024 updated to KCSIE 2025
April 2025 - Draft	DU	Draft version produced for review by CAB

1. Introduction

1.1 Artificial Intelligence (**AI**) technology is already widely used in both commercial and everyday applications, and its influence is anticipated to grow exponentially, impacting almost all industries and job sectors including education. Generative AI refers to technology that can be used to create new content based on large volumes of date that models have been trained on from a variety of works and other sources. Generative AI is a rapidly evolving and increasingly freely available technology generating writing, audio, codes, images and video simulations.

1.2 AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. This policy establishes guidelines for the responsible and effective use of AI within East Midlands Academy Trust (**EMAT**). By embracing AI technology, the trust aims to:

- Enhance academic outcomes and educational experiences for pupils
- Support teachers in managing their workload more efficiently and effectively
- Educate colleagues and pupils about safe, responsible, and ethical AI use
- Incorporate AI as a teaching and learning tool to develop colleagues and pupils' AI literacy and skills
- Prepare colleagues 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 personalised support
- Improve and streamline school operations to minimise cost and maximise efficiency.

1.3 All users of AI will comply with applicable laws, regulations, policies, and guidelines governing Keeping Children Safe in Education, intellectual property, copyright, data protection and other relevant areas. There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others. We will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts their safety or privacy at risk. Colleagues will not allow or cause intellectual property, including pupils' work, to be used to train Generative AI models without appropriate consent or exemption to copyright.

1.4 EMAT recognises that the technology is rapidly evolving and are committed to remaining at the forefront of developments, adapting our ways of working as necessary. The trust recognises the leadership in the education sector provided by the Department of Education and the guidance set out in their Statement on Generative Artificial Intelligence in Education. This AI policy has been informed by that guidance. As guidance and technology changes the policy therefore will need to remain under regular review. This policy will therefore be reviewed annually, however should there be changes occur in the interim the policy will be updated to address these changes outside to the annual review process.

1.5 EMAT will be transparent and accountable about the use of AI technology so that stakeholders, including colleagues, pupils, parents, and other partners understand where and how AI is used and who is responsible. Any stakeholder feedback or questions about the use of AI will be considered and responded to appropriately.

1.6 By adhering to this policy, we aim to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all involved.

4. Scope and Responsibilities

2.1 This policy applies to all colleagues, including temporary colleagues, consultants, governors, trustees, members, volunteers, and contractors, and anyone else carrying out duties on the trust's behalf. It is also applicable to pupils, but this group will require support and guidance from colleagues as part of their learning.

2.2 All colleagues are responsible for reading and understanding this policy before using any AI technology.

2.3 All leaders are responsible for ensuring their colleagues team read and understand this policy before using AI technology and that they follow this policy, including reporting any suspected breaches of it.

2.4 There are several colleagues in the trust who are key contributors to AI policy and development:

- Head of Shared Service acts as a lead for our school regarding the use of AI technology, monitors compliance with this policy and works with other colleagues to communicate, promote, and regulate AI use, providing or arranging for training to be given where necessary.
- Our Data Protection Officer is responsible for advising us about our data protection obligations in relation to AI use.
- Our IT Business Partner provides technical support and guidance on the operation of AI.
- Our Trustee Audit and Risk Committee and Head of Governance and Compliance will be responsible for the Governance of AI.
- Our Head of Education to ensure the trusts Teaching and learning plan.
- Our Lead for Curriculum, Performance and Standards to ensure our pedagogy is considered and is supported.
- School and Central based AI champions, Curriculum Leads, Exams officers, People and Culture Leads, external legal advisors.

2.5 Training will emphasise how AI can augment colleagues' roles, providing them with more time and resources to focus on tasks such as personalised instruction, pupil engagement, and critical thinking.

2.6 By combining the benefits of AI technology with professionals' expertise, experience, and professional judgment, we can create a collaborative and effective educational environment that maximises the benefits of both human and AI capabilities.

2.7 This policy also links to EMAT policies, including but not limited to the ICT Acceptable Usage Policy, Online Safety Policy, Data Protection Policy, Information Security Policy, Safeguarding policy, Procurement (sustainability) Policy, KCSIE 2025 and any academy-based malpractice policies and should be read in conjunction with them.

5. Use of AI by colleagues

3.1 Colleagues 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.

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

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

3.4 Colleagues 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 EMAT's administrative and teaching practices. Training and support will be planned as part of colleague's personal development reviews and appraisals or on an as-needed basis. Colleagues 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.

6. Use of AI by teaching staff

Teaching staff play a pivotal role in the safe, responsible and effective use of AI in education. Teaching staff are encouraged to contribute to ongoing evaluation and development of AI use in their schools and settings and settings. This section provides guidance on the rationale for using AI, examples of effective educational applications, and the potential benefits for teaching and learning.

4.1 Rationale for AI use

AI can support teachers by reducing workload, enhancing lesson planning, enabling personalised learning, and improving assessment and feedback. When used appropriately, AI tools can free up time for teachers to focus on high-value interactions with pupils and professional development. With all uses of AI, staff are the key decision-makers and must use their professional judgment.

4.2 Examples of effective educational uses

- **Lesson planning**: AI tools can be used to gathering and create relevant educational resources, generate whole group or personalised lesson plans and sequences of learning, generate extension tasks or scaffolded work. AI-based platforms can suggest specific topics or learning activities. Teaching colleagues are permitted to use these suggestions as a starting point but must use their professional expertise to customise the lesson plans and make necessary adjustments and adapt content to pupils' needs.
- **Personalised learning**: AI can help tailor content and pace to individual pupil needs, supporting inclusion and engagement.
- **Formative assessment**: AI can assist with formative assessment, generate quizzes, and provide feedback on pupil work. AI tools can be utilised to automate certain aspects of marking of pupils' work, such as multiple-choice or fill-in-the-blank assessments. AI-powered g software can be used to speed up scoring fact-based responses to objective questions, providing more time to support pupils individually. AI can also be used to identify areas for

improvement in more subjective pupil responses. Teaching colleagues must review and verify AI-generated marks or feedback to ensure accuracy, and use their professional judgment, especially when evaluating open-ended responses that require deeper analysis and interpretation.

- **Summative assessment**: staff can use AI tools as a starting point to gather relevant information and identify patterns in pupil progress and attainment to streamline processes, save time and ensure consistency. However, staff must use their expertise to ensure comprehensive and holistic evaluation of each pupil's progress and provide relevant feedback on pupils' academic achievements and overall development.
- **Reporting**: AI tools can be used to assist in writing pupil reports but staff must use their professional judgment and ensure accuracy. Where AI has been used to support with report writing, a colleague will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.
- **Professional development**: Teachers can use AI to access research summaries, generate reflective prompts, and support CPD activities.

4.3 Potential Educational Benefits

- Workload reduction: automating routine tasks allows teachers to focus on pedagogy and pupil relationships.
- Enhanced learning outcomes: personalised and adaptive learning experiences can improve pupil progress.
- Improved feedback: AI-generated feedback can be timely and targeted, supporting pupil development.
- Innovation: AI can inspire new approaches to teaching and learning, fostering creativity and collaboration.

4.4 Additional guidance for safe and effective use in educational contexts

- Use approved enterprise tools that meet safety and data protection standards.
- Avoid entering sensitive pupil data into public AI platforms.
- Apply professional judgment and evaluate AI outputs critically.
- Engage with CPD to build confidence and competence in AI use.
- Collaborate with colleagues to share best practice and reflect on impact.
- Where colleagues 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.

7. Use of AI by Pupils

7.1. As part of safeguarding policies and processes, schools and settings and settings will ensure that its pupils 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 pupils' age and educational needs. EMAT will ensure that colleagues are aware of the risks of AI which may be used to generate harmful content including deepfake and impersonation materials.

7.2. Pupils 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. As EMAT develops its approaches, AI can also support pupils to, for example, gain feedback on their work themselves using AI, replicating peer assessment processes. This will allow pupils 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 crucial that teaching colleagues play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.

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

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

7.5. AI education will be incorporated into the curriculum to provide pupils 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.

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

8. Potential misuse of AI

8.1. Pupils 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. Pupils will be encouraged by colleagues to be clear and transparent about where their work has been created with the assistance of AI.

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

8.3. Key messages are delivered and re-emphasised in all subjects where pupils are completing work for external grading.

8.4. EMAT 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 set these out here- see https://www.jcq.org.uk/exams-office/malpractice/artificial-intelligence/ for further information

8.5. Teaching colleagues will employ various assessment methods to evaluate pupil 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 utilising diverse assessment strategies, teaching colleagues can verify pupils'

comprehension beyond what AI tools can assess, promoting deep learning and authentic pupil engagement.

8.6. Specialist AI detection software may be used to scan submitted work produced by students to ensure compliance with this policy.

9. Ethical Use of AI

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

- Bias - data and information generated by AI will reflect any inherent biases in the data set accessed to produce it. This could include content which may be discriminatory based on factors such as race, gender, or socioeconomic background.
- 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.

10. Data Protection implications of using AI

10.1 Colleagues and pupils should be aware that any information provided to a Generative AI model is no longer private or secure. Colleagues and pupils 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. Colleagues should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI.

10.2 Colleagues 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 Procedure.

10.3 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.

10.4 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 pupil to take a certain subject at GCSE or A Level)

and representational harms (for example, selecting groups of pupils 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 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.

11. Cyber security

11.1 The Trust 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 IT Business Partner and or Head of Shared Service 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 GDPR 3rd Party Supplier review or 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 colleagues and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

12. Consequences

12.1 Failure to comply with this Artificial Intelligence Policy may result in one or more of the following actions taking place:

- restrict or terminate a colleague or pupils right to use the EMAT's ICT Infrastructure.
- withdraw or remove any material uploaded by that User in contravention of this Policy.
- disclose information to law enforcement agencies and take any legal action against a User for breach of this Policy, including but not limited to claiming all costs, fees and disbursements (including but not limited to legal fees) connected therewith; or
- where a colleague fails to comply with this policy, EMAT may take disciplinary action up to and including termination of employment.
- Pupils that fail to comply with this policy will be sanctioned under the schools and settings' policies there are specific sanctions that are detailed in schools and settings' malpractice and exams policies to address specific events