



Artificial Intelligence (AI) Policy

June 2026

Approved by	Date	Review Schedule	Date of next review
Trust Board	June 2026	Annual	June 2027

Saint Paul teaches, 'the body is not made up of one part but of many.'

Chester Diocesan Learning Trust recognises and nurtures the unique gifts, skills and talents within our whole community.

We will empower adults and children to grow in character and mind, shaping a better future.

Shaping better futures; one body, many parts.

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1. Aims and scope

Here at Chester Diocesan Learning Trust (CDLT) 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, customise 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 trust community.

This policy covers the use of AI tools by staff across the trust, trustees, local governors and pupils.

This includes generative chatbots such as ChatGPT and Google Bard (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff across the trust to explore AI solutions to improve efficiency and reduce workload
- Prepare staff across the trust, trustees, local 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 personalised support
- Ensure that AI technologies are used ethically and responsibly by all staff across the trust, trustees, local governors and pupils
- Protect the privacy and personal data of all staff across the trust, trustees, local governors and pupils in compliance with the UK GDPR

1.1 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

2. 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 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)

3. Regulatory principles

As a trust, 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 board of trustees, local governance committees and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI (see section 4)
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
CDLT Principle	AI is a decision-support tool, not a decision-maker. Staff remain professionally accountable for all work produced using AI and for all decisions affecting pupils, staff and governance. AI outputs will always be reviewed, challenged and approved by a human before being acted upon.

4. Roles and responsibilities

4.1 Board of trustees

The board of trustees will:

- Take overall responsibility for monitoring this policy and holding school leaders to account for its implementation in line with the trust's AI strategy
- Review and update the AI policy as appropriate, and at least annually
- Ensure school leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the trust

Trustees will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools (see section 5 and appendix 1)
- Seek advice from the data protection officer, 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
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

4.2 School leaders

School leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their school
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Liaise with the designated safeguarding lead (DSL) to ensure that the use of AI is in accordance with Keeping Children Safe in Education ¹ and the school's child protection and safeguarding policy
- 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

4.3 Trust data protection officer (DPO)

The trust-level data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including in relation to the use of AI.

Our DPO is Veritau and is contactable via schoolsdpo@veritau.co.uk

4.4 Designated safeguarding leads (DSLs)

DSLs are 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) and the school's child protection and safeguarding policy
- Understanding the filtering and monitoring systems and processes in place on school devices

4.5 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 5 and appendix 1)
- Seek advice from the Data Protection Officer / IT lead / DSL, as appropriate
- Report safeguarding concerns to the DSL in line with the trust's child protection and safeguarding policy
- 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
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

¹ This policy reflects legislation and statutory guidance in force at the date of approval. Some statutory guidance (including Keeping Children Safe in Education) is updated annually or more frequently. Schools are responsible for ensuring compliance with the current statutory requirements pending the next scheduled review of this policy. Where significant legislative or statutory changes arise, Chester Diocesan Learning Trust may issue interim guidance or revised documentation. Schools requiring clarification should contact the Trust.

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.

4.6 Pupils

Pupils must follow the guidelines set out in section 7 of this policy.

5. Use of AI by staff across the trust, trustees and local governors

5.1 Approved use of AI

At CDLT we are committed to helping staff, trustees and local governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete, but cannot replace the judgement 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 remains the professional responsibility of the person who produced it.

Any plans, policies or documents created using AI should be clearly attributed. Any member of staff, trustee or local governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, trustees or local 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.

The table below sets out the approved AI tools and the approved uses for each tool.

Use Case	Examples	Open AI Tools Allowed?	Closed AI Tools Allowed?	Conditions / Safeguards	Approval Required
Administrative tasks	Drafting letters, emails, reports, job descriptions	Yes	Yes	No personal or identifiable data entered into open tools; outputs must be checked	No
Policy and document drafting	First drafts of policies, guidance documents, communications	Yes	Yes	Must be reviewed, edited and approved by a competent professional; responsibility remains with author	No

Lesson planning and curriculum resources	Lesson plans, quizzes, worksheets, differentiation ideas	Yes	Yes	Must be reviewed for accuracy, bias and suitability; aligned with curriculum intent	No
Data analysis (non-sensitive)	Summarising anonymised data, trends, survey results	Limited	Yes	Open tools must not be used with identifiable or sensitive data; anonymisation required	No
Data analysis (personal/sensitive data)	Pupil data, SEND information, safeguarding data	No	Conditional	Only approved, secure (closed) systems; must comply with GDPR and DPO advice	Yes
Communication support	Simplifying text, translating content, adapting reading levels	Yes	Yes	No identifiable personal data in open tools; outputs must be checked for accuracy	No
Assessment support	Generating example questions, mark schemes, feedback ideas	Yes	Yes	AI may be used to generate assessment materials or feedback ideas, but must not determine grades, assessment outcomes or personalised pupil feedback without meaningful human review and approval.	No

Safeguarding or behavioural analysis	Drafting reports, analysing incidents	No	Conditional	Must be approved by DSL; no use of open tools; high caution required	Yes
Use with identifiable pupil information	EHCPs, reports, personalised feedback	No	Conditional	Must comply with data protection policy and use secure systems only	Yes
Image/audio/video generation	Creating teaching resources, visuals	Yes	Yes	Must be appropriate, non-offensive, and checked for bias or copyright issues	No
Experimental or new AI use	Any new or innovative use not listed above	Case-by-case	Case-by-case	Must be discussed with senior leader and approved before use	Yes

Human Oversight (Human-in-the-Loop)

All AI-generated content must be subject to meaningful human oversight before it is relied upon or shared. Artificial intelligence must support, but never replace, professional judgement.

AI must not be used to make autonomous decisions regarding pupils, staff or governance. In particular, AI-generated content must not be used as the sole basis for assessment, grading, personalised pupil feedback, safeguarding decisions, behaviour decisions, or SEND decision-making. A suitably qualified member of staff must review, verify, amend where necessary, and take responsibility for all final decisions and communications.

5.2 Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their senior leader to discuss any ideas they may have with regards to using AI, so they can take the suggestions forward if they deem it to be a satisfactory new method of working.

The Headteacher (CEO at Trust level) is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO, and data protection impact assessments.

5.3 Data protection and privacy

Staff must never enter Special Category Data (as defined by UK GDPR), including but not limited to information relating to a person's health, disability, ethnicity, religion, biometric data, safeguarding concerns, child protection records, SEND information, disciplinary matters or other confidential pupil or staff information into publicly available or "open" AI tools.

Such information may only be processed using Trust-approved, secure "closed-loop" AI systems where appropriate contractual, technical and organisational safeguards are in place, a lawful basis for processing exists, and approval has been obtained in accordance with this policy.

Deliberate or negligent disclosure of Special Category Data into unauthorised AI systems may constitute a personal data breach and will be managed in accordance with the Trust's Data Protection Policy.

5.4 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.

CDLT 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.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.5 Bias

We are aware that AI tools can perpetuate existing biases, particularly towards protected characteristics including sex, race and disability. For this reason, critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output.

CDLT will ensure we can identify and rectify bias or error by training staff in this area.

We will 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.

5.6 Raising concerns

We encourage staff to speak to their school leader in the first instance if they have any concerns about the potential use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL in accordance with the school's trust's child protection and safeguarding policy.

5.7 Ethical and responsible use

CDLT will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our trust's equality policy when using generative AI tools
- 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

Where AI-generated content relates to legislation, statutory guidance, safeguarding, employment law, data protection, finance, health and safety, or any other area of regulatory compliance, staff

must verify the information against the relevant original source document or seek appropriate professional advice before relying upon or implementing the output.

AI-generated information must never be treated as an authoritative source of legal or statutory advice.

Staff members, trustees and local 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

6. Educating pupils about AI

Here at CDLT 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 best use of generative AI.

Education about AI will be delivered through a broad, age-appropriate curriculum, including computing, PSHE/RSHE and online safety. Schools will ensure that teaching reflects the needs and context of their pupils.

Pupils will be supported to:

- Understand what AI is and where it is used in everyday life
- Recognise the strengths and limitations of AI, including the potential for inaccuracy or bias
- Think critically about AI-generated content rather than accepting it at face value
- Use AI tools safely, including understanding that personal or sensitive information should not be shared
- Use AI ethically, including understanding expectations around plagiarism and academic integrity
- Recognise potential safeguarding risks associated with AI and know how to report concerns

Staff will provide clear guidance on when AI may be used to support learning and will reinforce expectations around safe, responsible and appropriate use.

The Trust will ensure that this area is kept under review so that teaching remains up to date with developments in AI and emerging risks.

7. Use of AI by pupils

CDLT recognises 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.

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 or share explicit or offensive content, including, but not limited to, generating inappropriate or sexualised images of pupils
- Input offensive, discriminatory or inappropriate content as a prompt

8. Formal assessments

CDLT will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. Malpractice or unauthorised AI use in statutory national assessments will additionally be handled and reported in accordance with Department for Education and Standards and Testing Agency (STA) guidelines.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on AI use in assessments.

9. Staff training

The Trust is committed to ensuring that all staff maintain a strong and up-to-date understanding of artificial intelligence (AI), its applications, and its associated risks and opportunities within education. This will be achieved through a structured programme of awareness, training, and continuous professional development (CPD).

All staff will receive appropriate guidance and training to support a baseline understanding of AI, including its ethical use, limitations, and implications for teaching, learning, data protection, and safeguarding. AI will be incorporated into existing training on safe internet use and online safeguarding to ensure staff can recognise and respond to potential risks, including misuse, bias, and data privacy concerns.

Training will include:

- recognising AI bias and hallucinations;
- appropriate prompting techniques;
- safe handling of Special Category Data;
- understanding when AI outputs require verification against statutory guidance;
- ethical and accountable use of AI within education.

Responsibility for overseeing AI-related CPD will sit with each school (and CFOO at Trust level) who will ensure that relevant training opportunities are identified, communicated, and accessible to all staff. This will include a combination of internal training, external courses, briefings, and updates aligned with national guidance.

The Trust will actively monitor developments in AI by engaging with guidance from the Department for Education, professional bodies, and sector networks. Mechanisms will be established to share emerging good practice across the Trust, including staff briefings, communities of practice, and regular updates. Schools and departments will be encouraged to share effective approaches and experiences to support a culture of collaborative learning and continuous improvement.

Through these measures, the Trust aims to ensure that staff are confident, informed, and able to use AI safely, effectively, and in line with the Trust's values and policies.

10. Referral to our child protection and safeguarding policy

The trust is aware that the use of generative AI may in some circumstances lead to safeguarding concerns including, but not limited to:

- Sexual grooming
- Sexual harassment
- Sexual extortion
- Child sexual abuse/exploitation material
- Harmful content
- Harmful advertisements and promotions
- Bullying

Where there are safeguarding concerns arising from the use of generative AI a report must be made to the DSL immediately.

Any such incident will be dealt with according to the procedures set out in the school's child protection and safeguarding policy and child protection referral process.

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with the trust's staff 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 members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing the trust with access to:

- The generative AI application in question (whether or not it is one authorised 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 your senior leader immediately.

11.2 By trustees or local governors

Trustees or local governors found to be in breach of this policy will be subject to appropriate action in line with the Trust's governance procedures, code of conduct, and relevant statutory guidance. Alleged breaches will be referred to the Chair of Trustees (or Vice Chair where appropriate), who will ensure that concerns are reviewed promptly, fairly, and proportionately. Where necessary, this may involve an investigation to establish the nature and seriousness of the breach.

Depending on the findings, actions may include:

- Informal resolution, advice, or additional training;
- Formal consideration under the Trust's governance or conduct procedures;
- Temporary or permanent removal from specific responsibilities or committees;
- In serious cases, escalation in line with the Trust's Articles of Association, which may include suspension or removal from office.

Where breaches relate to safeguarding, data protection, or legal compliance, the Trust will ensure that appropriate external reporting requirements are met.

The Trust is committed to maintaining high standards of conduct and accountability at all levels of governance. All actions taken will be proportionate, transparent, and in line with the principles of natural justice.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with the school's behaviour policy.

12. 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 CFOO whenever there is a significant change to either AI use by the trust 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.

The policy will be shared with the board of trustees at least annually.

We will ensure we keep members of the trust 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 across the schools in our trust.

Appendix 1: Approved uses of AI tools (table)

AI tools must not be used to process personal data, pupil information, safeguarding information, or confidential Trust data unless explicitly approved and compliant with data protection policies.

All AI outputs must be reviewed, validated and approved by an appropriately qualified member of staff before use. AI may assist professional decision-making but must never replace human judgement or accountability.

Staff remain fully accountable for any content produced using AI tools.

This list will be reviewed regularly to reflect emerging technologies and updated guidance.

Approved AI tools	Approved for	Approved uses
KeyGPT	Teachers; Governors; Senior leaders; Administrative staff	Drafting letters to parents/carers; Job descriptions and adverts; Interview questions; Policy drafting and review; General communications and reports; Summarising non-sensitive documents
Oak National Academy AI Lesson Planner	Teachers	Lesson planning; Curriculum sequencing ideas; Creating lesson outlines and activities; Differentiation suggestions (non-pupil-specific)
Microsoft Copilot / Google Gemini	Teachers; Senior leaders; Administrative staff	Drafting emails and documents; Meeting summaries (non-confidential); Creating presentations; Data analysis using anonymised datasets; Workflow efficiency tasks
Grammarly / AI writing assistants	All staff	Proofreading and improving written communication; Clarity and tone adjustments
Canva AI tools	Teachers; Administrative staff	Creating teaching resources; Designing newsletters and communications; Presentation materials (non-sensitive content)

ChatGPT (or equivalent)	Teachers; Governors; Senior leaders	Generating ideas for teaching and learning; Drafting non-confidential content; Explaining concepts; Policy drafting support
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