SHEFFIELD UTC ACADEMY TRUST
MAKING THE FUTURE

AI POLICY

Status: Statutory

Member of Staff Responsible: Executive Principal / Business & Operations Director

Related Policies:

- Safeguarding & Child Protection Policy
- IT Acceptable use agreement
- Privacy Notices
- GDPR Data protection policy
- Assessment policy
- Exams policy
- Behaviour policy
- Staff code of conduct within the Staff Handbook
- Disciplinary Policy
- Marking and feedback policy
- Online safety policy
- Diversity, Equality and Inclusion policy

Implementation date: April 2026

Reviewed date: April 2026

Next review date: September 2027

1. Aims and scope

Here at The Sheffield UTC Academy Trust, 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 UTC and Trust community.

This policy covers the use of AI tools by UTC and Trust staff, Trustees, Members, Local Governors and students. This includes generative chatbots such as Microsoft Copilot, 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, Trustees 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, governors, Trustees and students
- Protect the privacy and personal data of staff, Trustees, Members and Local Governors and students 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 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)

3. 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 Trustees / Local Governing Bodies 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

4. Roles and responsibilities

4.0 AI lead

Our AI lead will be the Deputy CEO who is also the Digital Lead. In conjunction with the Principal's, they are responsible for the day-to-day leadership, ownership and management of AI use in the UTCs. The Business & Operations Director (B & OD) in conjunction with the Trust Network Manager will support the AI Lead in overseeing AI across the Trust.

4.1 Trust Board / Local Governing Bodies The Trust board will:

- Take overall responsibility for AI across the Trust and for monitoring this policy and holding the Trust Executive Leadership Team to account for its implementation in line with the Trust's AI strategy
- The Local Governing Bodies will assist Trust Board by monitoring each UTC locally
- Ensure the Trust staff, Principals and AI leads are appropriately supported to make informed decisions regarding the effective and ethical use of AI in the UTCs
- The operational use of AI tools is delegated to the Trust team to ensure that the Trust staff adhere to the guidelines below to protect data when using generative AI tools:
- Use only approved AI tools (see section 5 and appendix 1 which will need to be updated regularly without the need for the policy coming back to Trust Board for approval)
- Seek advice from the Business & Operations Director / Trust Network Manager / Data Protection Officer / AI lead and the designated safeguarding leads, 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 Principals in each UTC The Principal will:

- Liaise with the AI Lead / Business & Operations Director / Trust Network Manager and Data Protection Officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Liaise with the DSL / AI lead to ensure that the use of AI is in accordance with Keeping Children Safe in Education and the school's child protection and safeguarding policy
- Ensure that the guidance set out in this policy is followed by all staff
- In conjunction with the Trust team review and update this AI policy as appropriate, and at least annually
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure students are taught about the effective use and potential risks of AI

4.3 Business & Operations Director

- Will support the AI lead in signing off on approved uses of AI, or new AI tools, taking into account feedback and advice from the Principal's, Trust Network Manager, Safeguarding leads and DPO and data protection impact assessments

4.4 Data protection officer (DPO)

The 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 Toby Wilson and is contactable via toby@edudatapro.com

4.5 Designated safeguarding lead (DSL)

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

The UTC's DSL's are:

City – Kay Dulley kdulley@utcsheffield.org.uk
OLP – Theresa Clark tclarke@utcsheffield.org.uk
Derby – Sharon Hunt shunt@utcderby.org.uk

4.6 All staff

As part of our aim to reduce staff workload while improving outcomes for our students, 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:

- Only approved AI tools can be used for clearly defined Areas of Use, (see section 5 and appendix 1). Where a tool is not explicitly approved for an Area of Use that tool is not permitted and must not be used for that purpose.
- No AI tools are permitted or approved for data analysis or where student grades and/or other personally identifiable data is to be uploaded to an AI tool.
- Seek advice from the AI Lead / B & OD / Principal / Data Protection Officer / Trust Network Manager, Safeguarding Lead as appropriate
- Report safeguarding concerns to the DSL in line with the UTC'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

All staff play a role in ensuring that students 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.

4.7 Students

Students must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by students')

5. Staff, Trustees, Members and Governors' use of AI

5.1 Approved use of AI

We are committed to helping staff, Trustees, Members and 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, Member or Governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, Trustees, Members 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.

5.2 Process for approval

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

The AI Lead / B & OD is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the Principals, Trust Network Manager, the DPO and data protection impact assessments.

5.3 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, the Sheffield UTC Academy Trust 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 10 of this policy.

5.4 Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models. Students 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.

Student's 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.

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.

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 students 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 and governors to speak to the Principal 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.

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

5.7 Ethical and responsible use We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our UTC's equality and diversity 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 • Fact and sense-check the output before relying on it Staff, Trustees, Members or 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 students about AI

Across the Trust, students are taught about the **appropriate and beneficial use of AI tools** as part of a broader, knowledge-rich curriculum focused on digital literacy, critical thinking and responsible technology use.

Students are supported to understand how AI tools may be used to **aid learning**, for example through:

- supporting research and idea generation
- improving clarity and structure in drafting work
- providing alternative explanations or representations of concepts
- supporting accessibility and independent study

Alongside this, the curriculum explicitly addresses the following areas:

Creating and using digital content safely and responsibly

Students are taught how to create, adapt and share digital content in ways that are ethical, lawful and aligned with expectations around academic integrity, data protection and intellectual property.

Limitations, reliability and potential bias of generative AI

Students learn that AI outputs may be inaccurate, incomplete or biased, and are taught to evaluate information critically, cross-check sources and apply subject knowledge and professional judgement.

How information on the internet is organised and ranked

Students are taught how online information is curated, ranked and presented, including the role of algorithms, search engines and commercial influence, enabling them to understand why some information is prioritised over others.

Online safety and protection from harmful or misleading content

Online safety education ensures that students understand how to identify harmful, misleading or inappropriate content, manage digital risk, and know how and where to seek support if concerns arise.

This teaching is **age-appropriate**, embedded within relevant subjects and pastoral provision, and supports students to become confident, informed and responsible users of digital technologies, including AI.

7. Use of AI by students

We recognise that AI has many uses to help students learn. AI has the potential to support students in their learning when used **appropriately, ethically and transparently**
Students may use AI tools:

- Support understanding of concepts through alternative explanations
- Assist with research, planning and idea generation

- When specifically studying and discussing AI in schoolwork, for example in IT lessons or art homework about AI-generated images
- Improve clarity, structure and accuracy in **drafting** work
- Support accessibility and independent learning, where appropriate

Use of AI by students must always:

- Align with curriculum expectations and teacher guidance
- Comply with the Trust's Acceptable Use, Safeguarding and Data Protection policies
- Be transparent, with students able to explain how AI has been used to support their work
- Not replace independent thinking, learning or assessed work

All AI-generated content must be properly attributed and appropriate for the student's age and educational needs.

AI may also lend itself to cheating and plagiarism. To mitigate this, students 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)
- To access or share harmful, misleading or inappropriate content

This list of AI misuse is not exhaustive. Teachers will provide clear guidance to students on when AI use is permitted, restricted or prohibited within specific subjects and assessment contexts.

Use of AI in assessment and examination integrity

In line with guidance from the **Joint Council for Qualifications (JCQ)**, all work submitted for assessment must be the student's **own independent work**. The inappropriate use of artificial intelligence to generate or complete assessed work, where this is then presented as the student's own, constitutes **malpractice** and may result in sanctions in accordance with JCQ regulations.

AI tools may only be used in non-examination assessments where this is **explicitly permitted by the awarding body and the centre**, and where such use supports, rather than replaces, the student's own thinking and understanding. Any permitted use of AI must be **transparent**, and students must be able to explain how AI was used and demonstrate independent subject knowledge.

AI tools are **not permitted** in formal examinations, controlled assessments or any assessment conditions where external assistance is prohibited.

Staff remain responsible for maintaining assessment integrity and for exercising professional judgement when evaluating the authenticity of student work. AI detection tools, where used, will not be relied upon in isolation and will form part of a broader process that considers student performance, prior evidence and professional judgement.

The Trust will ensure that students are clearly taught expectations around AI use in assessment and that relevant malpractice and assessment policies explicitly reflect current JCQ guidance.

Where AI tools have been used as a source of information, students 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 and will follow our plagiarism procedures as set out in the *Exams Malpractice Policy.*

The policy states:

The UTC recognises that Artificial Intelligence (AI) tools, such as generative language models (e.g., ChatGPT, Gemini) and code generators, are evolving educational and professional aids. However, for all formal assessments, coursework, and non-examination assessments (NEAs), the fundamental principle of authenticity remains paramount: all work submitted for assessment must be the student's own, independent demonstration of their knowledge, skills, and understanding.

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

8. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments. See our *Exams Policy, Exams Malpractice Policy* and *Nonexamination Assessment Policy*.

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

9. Staff training

As AI technology continues to develop, the Sheffield UTC Academy Trust recognises the importance of ensuring that staff are **supported to understand relevant developments** and how AI may be used to enhance professional practice safely and appropriately.

We will endeavour to provide information and training for staff:

- Supports understanding of AI at a conceptual and practical level
- Promotes safe, ethical and responsible use in line with Trust policies
- Addresses data protection, safeguarding and information security considerations
- Supports workload reduction and effective practice, where appropriate
- Aligns with national guidance and sector expectations

Training and guidance will be **proportionate**, reviewed regularly, and may take a range of forms, including briefings, written guidance or targeted professional development, rather than continuous or tool-specific training.

Staff are expected to engage with relevant guidance and apply professional judgement when using AI as part of their role.

10. Referral to our child protection and safeguarding policy

The Trust and UTCs are 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
- Peer-on-peer abuse / 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 UTC'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 our staff code of conduct and Disciplinary Policy.

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 UTC device
- At home, within the UTCs 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 us with access to:

- The generative AI application in question (whether or not it is one authorised by the Trust / UTC)
- Any relevant passwords or login details

You must report any breach of this policy, either by you or by another member of staff, to the Principal immediately.

11.2 By Trustees. Members, Governors

Trustees, Members or Governors found in breach of this policy will be referred to Trust Board.

11.3 By students

Any breach of this policy by a students will be dealt with in line with our 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 whenever there is a significant change to either AI use by the Trust or UTCs 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 full Trust Board at least annually.

All teaching staff are expected to read and follow this policy. The Principals are responsible for ensuring that the policy is followed.

The AI lead will monitor the effectiveness of AI usage across the Trust and Principals across their UTCs.

We will ensure we keep members of the UTC community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from students, parents/carers and staff will be considered in the ongoing evaluation and development of AI use in the UTCs and within the Trust.

AI-related incidents will be defined as any breach to this policy. These will be recorded, monitored and reported to Trustees.

Appendix 1: Approved uses of AI tools (table)

Note that open AI tools, meaning tools that anyone can access and modify, should only be used for tasks that don't require personal information to be input

- **UK guidance does not mandate specific tools**; instead it focuses on ensuring tools comply with data protection and safeguarding requirements before use.
- Tools with **enterprise-grade security and closed environments** (where data does *not* leave the organisation) are generally safer for use with school data than open, consumer tools.
- Tools should be reviewed and checked to ensure they are age appropriate by the AI Lead, B&OD, Trust Network Manager and DPO to confirm appropriateness
- Staff wishing to use tools not on the approved list must submit a request in writing using the following link, and this will be considered on a half termly basis.

The tools listed below are examples of AI platforms currently approved for use at the time of publication. Approval is conditional on use within Trust-managed systems and may be reviewed or withdrawn in line with changes to national guidance, data protection requirements or security assessments. Use of any other AI tools requires explicit Trust approval.

Tools are approved based on their "data at rest" and "data processing" settings. Tools will only be used where Trust data can be excluded from training AI Models.

A new DPIA must be undertaken before any other tools are approved.

APPROVED AREA OF USE	EXAMPLE	APPROVED FOR	CONDITIONS AND SAFEGUARDS	APPROVED AI TOOLS
Lesson planning & curriculum design	Generating lesson ideas, sequences, examples or alternative explanations	Teachers Trustees / Governors SLT	No student identifiable data entered; content reviewed and adapted by staff	Microsoft Copilot (within Trust managed accounts)
Coding	Generating complex lines of code for computing applications	Teachers	Staff to ensure safeguards	GitHub Copilot, REPLIT AI, Teachable Machine
Resource creation	Drafting worksheets, practice questions, exemplar materials or presentations	Teachers Trustees / Governors SLT	Outputs must be checked for accuracy, bias and curriculum alignment	Microsoft Copilot, OpenAI ChatGPT Enterprise (with controls)
Differentiation & accessibility	Adapting language level, simplifying explanations, alternative formats	Teachers Trustees / Governors SLT	Used to support inclusion; does not replace teacher judgement	Microsoft Copilot; built-in Microsoft accessibility tools

Assessment preparation	Creating practice questions or revision materials	Teachers Trustees / Governors SLT	Must not generate live assessment content or answers for assessed work	Microsoft Copilot, OpenAI ChatGPT Enterprise (with controls)
Professional writing	Drafting generic communications, policies or summaries	Teachers Trustees / Governors SLT	No personal, confidential or sensitive Trust data included	Microsoft Copilot
Research & information synthesis	Summarising public-domain information or guidance	Teachers Trustees / Governors SLT	Information must be verified against reliable sources	Microsoft Copilot
Administrative support	Supporting task planning, checklists and workflow organisation	Teachers Trustees / Governors SLT	AI used as a productivity aid, not a decision-maker	Microsoft Copilot
Student learning support (where permitted)	Supporting understanding, planning or drafting	Teachers Trustees / Governors SLT	Must align with teacher guidance and academic integrity expectations	Trust-approved platforms only
Professional development	Supporting reflection, explanations or CPD exploration	Teachers Trustees / Governors SLT	Used critically alongside professional expertise	Microsoft Copilot