



Transforming Lives
EDUCATIONAL TRUST



Artificial Intelligence (AI) Acceptable Use Policy

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Contents

Section	Page
1. The TLET Way	4
2. Definition of Terms	5
3. Rationale and Statutory Requirements	5
4. Scope	5
5. Principles	8
6. Procedure	8
7. Monitoring	13
8. Related Documents	14

1 – The TLET Way

Transforming Lives Educational Trust (TLET/The Trust) is a family of academies. Every TLET policy is rooted in and reflects our ambitions for pupils, students and wider stakeholders alike.

OUR AMBITIONS -

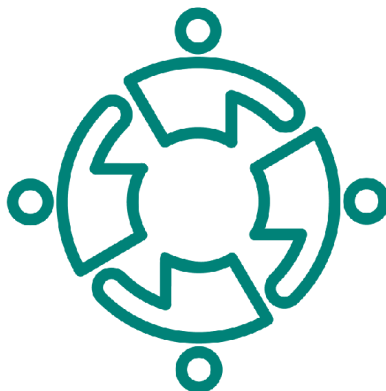
As a Trust family, our shared ambitions drive everything we do, we call this ‘The TLET Way’.

Through the transformative values of courage, kindness and loyalty, together we:



NURTURE POTENTIAL

We flourish in the places we create together.



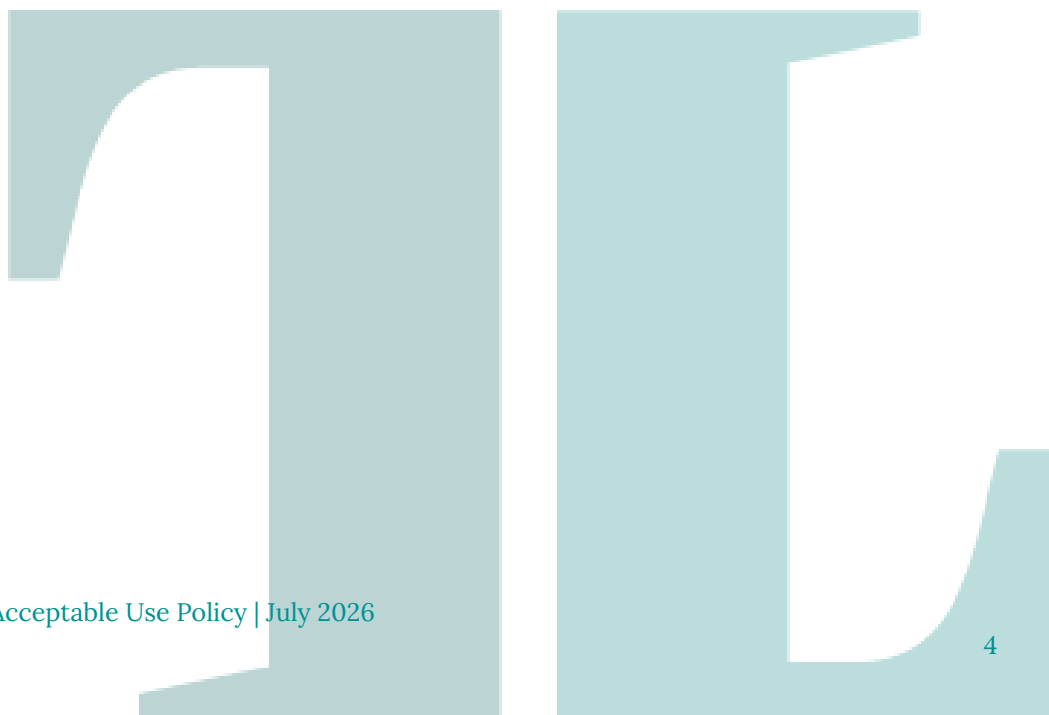
INSPIRE COMMUNITY

We champion each other to make a difference.



DELIVER EXCELLENCE

We strive to achieve our best.



2 – Definition of Terms

This policy refers to both 'open' and 'closed' generative Artificial Intelligence (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.

3 – Rationale and Statutory Requirements

At TLET, we understand the valuable potential that, including generative AI, holds for academies and Trusts. 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 trust staff, members, trustees, governors, and pupils. This includes generative chatbots such as ChatGPT and Google Gemini (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning
- Support staff to explore AI solutions to improve efficiency and reduce workload
- Prepare staff, members, trustees, 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, members, trustees, governors, and pupils
- Protect the privacy and personal data of staff, members, trustees, governors, and pupils in compliance with the UK GDPR

4 – Scope

This policy refers to:

Parents/Carers	✓	Trustees	✓
Employees	✓	Volunteers	✓
Pupils/Students	✓	Visitors	
Governors	✓	Community	

4.1 Roles & Responsibilities

4.1.1 The Board of Trustees

The board of trustees has ultimate responsibility to make sure there are arrangements in place for the use of AI across the Trust. Although the trust delegates certain duties to different levels as outlined below, the board is still accountable for making sure the trust is compliant with the requirements in the above legislation and guidance.

The board will also determine and approve this policy.

4.1.2 The Trust IT Manager

The Trust IT Manager will play a critical role in ensuring the secure, ethical and effective implementation of AI, by:

- Infrastructure support: Ensuring the Trusts IT infrastructure is capable of supporting AI tools and platforms, including adequate hardware, software, network capacity and cyber security measures.
- Vendor assessment and risk management: Evaluate third-party AI vendors for security, privacy and educational suitability. Identify and mitigate potential risks associated with AI technologies.
- Training and support: provide technical training and ongoing support for staff using AI tools, and assist in troubleshooting and issue resolution.
- Monitoring and maintenance: continuously monitor alongside the Principals, the performance and impact of AI tools and ensure updates, patches and security measures are regularly applied.
- Policy compliance: work closely with leadership to ensure all AI applications align with the Trusts AI policy and broader ethical and educational standards.

4.1.3 The Trust Director of Operations will:

Ensure the Principal is appropriately supported to make informed decisions regarding the effective and ethical use of AI in the academy.

Review and update this AI policy as appropriate, and at least annually.

4.1.4 Principal

The Principal will:

Take responsibility for the day-to-day leadership and management of AI use in the academy, unless delegated to a named AI Lead:

- 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 (KCSIE) and the Trusts 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
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the DPO, AI lead, and data protection impact assessments

4.1.5 AI leads

Take responsibility for delegated tasks as above as delegated by the Principal.

4.1.6 Trust Data Protection Officer (DPO)

The Trust 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 Alice Wright and is contactable via dpo@tlet.org.uk

4.1.7 Designated Safeguarding Lead

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

- Being aware of new and emerging safeguarding threats posed by AI.
- Understanding the filtering and monitoring systems and processes in place on Trust devices.
- Updating and delivering staff training on AI safeguarding threats.
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE) and the Trusts Child Protection and Safeguarding Policy.

The Trust DSL is Rebecca Duck and is contactable by dsl@tlet.org.uk and the Academy DSL is Sian Warde and is contactable via wardes@houlton.tlet.org.uk

4.1.8 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 6)
- Seek advice from the data protection officer / IT / AI lead, as appropriate
- Check whether they are using an open or closed generative AI tool
- Ensure there is no identifiable information included in what they put into open generative AI tools
- 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 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.

4.1.9 Pupils

Pupils must:

- Follow the guidelines set out in section 6 of this policy ('Use of AI by pupils')

5 – Principles

5.1 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 AI: product safety standards](#) published by the Department for Education (DfE)
- [AI use in assessments](#) published by the Joint Council for Qualifications
- [Generative artificial intelligence \(AI\) and data protection in academies](#), published by the Department for Education (DfE)

5.2 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 \(DPA 2018\)](#)

6 – Procedure

6.1 Staff, Members, Trustees, and Governors use of AI

Approved use of AI

We are committed to helping staff, board 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. Technology, including generative AI, should not replace the valuable relationship between teachers and pupils.

Any content produced using AI requires critical judgement to check for appropriates and accuracy. 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, members, trustees or governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff 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.

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact the Principal with ideas they may have with regards to using AI, so they – in consultation with others, as appropriate – can assess whether they deem it to be a satisfactory new method of working.

6.2 Process for approval

The Principal is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO and IT manager.

As part of this process, we will seek assurances from suppliers of AI tools about how their products meet the DfE's [AI product safety standards](#).

If it is strictly necessary to use an AI tool to process personal data, we will carry out a data protection impact assessment (DPIA) in addition to the risk assessment. The DPO will advise on this. If the use case is approved, we will also update our privacy notices accordingly.

In the case of AI tools intended for use by pupils, the process must consider:

- Age restrictions set by AI tools
- Statutory requirements of [KCSIE](#) and our child protection and safeguarding policy
- [Filtering and monitoring standards](#) to make sure we have the appropriate systems in place to protect pupils from harm
- The DfE's [AI product safety standards](#)

6.3 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 that have not been approved as safe for this use case.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, TLET will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy ([TLET Data Protection Policy](#)). Please also refer to the 'breach of this policy' section of this policy.

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.

In addition, materials created by teachers may be copyright material. Examples of what may be deemed original creative work include:

- Essays, homework or any other materials written or drawn by a pupil aside from multiple-choice questions responses
- Lesson plans created by a teacher
- Prompts entered into generative AI tools

We 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.

We are aware that secondary infringement could happen if AI products are trained on unlicensed material and outputs and then used in schools or published more widely, such as on the school's website. This may include:

- Publishing a policy that has been created by an AI tool that used input taken from another school's policy without that school's permission
- Using an image on a website that has been created by an AI tool using input taken from the copyright holder without their permission

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

Bias

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

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

We also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual complaints procedure.

[Complaints Policy](#)

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.

Ethical and responsible use

We will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our Trust's Equality & Diversity policy when using generative AI tools [Equality and Diversity Policy](#)
- 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 and governors must not:

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

7. Educating pupils about AI

At TLET we acknowledge that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make the best use of generative AI.

Houlton School delivers these core competencies through a cross-curricular approach, integrated primarily within the Computing (including Broadcast), PSRHE, and pastoral frameworks as follows:

Potential Benefits of AI Tools to Aid Learning

Houlton School explicitly acknowledges in its AI framework that artificial intelligence has "many benefits and the potential to enhance outcomes and educational experiences." Pupils are taught to view AI as an interactive learning aid.

- **Aiding Learning:** Instead of using AI to generate finished pieces of work (which violates academic integrity guidelines), pupils are taught to use approved AI tools for brainstorming, structure generation, and finding examples of persuasive or technical language.
- **Personalized Support:** Pupils learn how AI can act as an adaptive, personal study aid to provide explanations or break down complex concepts when they get stuck during independent study.

Creating and Using Digital Content Safely and Responsibly

Responsibility in digital creation underpins Houlton School's Pupil ICT Acceptable Usage Policy and computing curriculum.

- **Respecting Copyright & Intellectual Property:** Students are taught that generative AI models scrape existing data. They learn about the ethical implications of using digital media, understanding that they must not infringe on copyright laws, and that their own work shouldn't be fed into third-party AI models without consent.
- **Responsible Content Sharing:** Through both Key Stage 3 and Key Stage 4 Computing classes, students explore how to manipulate digital audio, video, and imagery (via the school's unique *Broadcast* curriculum focus). Alongside the technical skills, they are taught the strict behavioral and legal expectations regarding content creation—learning that generating or sharing content intended to shock, denigrate, humiliate, or upset others carries strict school sanctions and potential referral to authorities.

Limitations, Reliability, and Potential Bias of Generative AI

As part of developing critical thinking skills, Houlton School integrates data and AI literacy into its curriculum to teach students how to challenge digital outputs.

- **AI Hallucinations and Inaccuracies:** Pupils are explicitly taught how to question an AI response. They learn that AI generates responses that sound confident and plausible, but can often be factually incorrect, incomplete, or misleading.
- **Societal Bias:** The curriculum covers how AI models are trained on historical data, meaning they can inherently reproduce societal biases or replicate the prejudices of the people who originally engineered them. Pupils learn how to critically evaluate these outputs before using them.

How Information on the Internet is Organised and Ranked

This foundational computer science concept is delivered within the core Computing hours (all Key Stage 3 pupils receive 2 hours per fortnight).

- **Search Mechanics & Algorithms:** Pupils learn how search engines index the web and rank information.
- **The AI Shift:** Crucially, this is updated to cover how recommendation algorithms and AI search models predict what content to show users. By understanding that algorithms dictate their feeds, pupils learn to recognize that the top-ranked or most visible search results are not inherently the most accurate or unbiased.

Online Safety to Protect Against Harmful or Misleading Content

Online safety at Houlton School is delivered dynamically via the Computing curriculum, pastoral programmes, and regular participation in Safer Internet Day.

- Critical Media Literacy: Students are trained to protect themselves against misleading content, deepfakes, and "fake news."
- Protecting Personal Data: Pupils are instructed heavily on standard cybersecurity protocols, such as keeping personal credentials secret and avoiding inputting sensitive personal or school information into online search bars and AI platforms.
- Reporting Safeguarding Risks: The school maintains a highly promoted reporting culture. Pupils are taught exactly how to handle encounters with inappropriate, unsafe, or emotionally manipulative content online by reporting it immediately to the school's Designated Safeguarding Lead (DSL) or via internal systems like CPOMS.

8. Use of AI by pupils

We recognise that AI has many uses to help pupils learn.

Pupils may use AI tools:

- That have been approved for their use in school
- As a research tool to help them find out about new topics and ideas
- When specifically studying and discussing AI in academic work, for example in IT lessons or art homework about AI-generated images
- To support secondary proofreading and literacy development, such as identifying grammatical errors or exploring alternative vocabulary choices.
- Provided that any AI assistance is fully disclosed and cited in accordance with the Academy's Academic Integrity guidelines, ensuring no AI-generated text is passed off as the pupil's own independent work.

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)
- To fabricate or generate false data, citations, or references within any academic submission.
- In conjunction with automated paraphrasing tools or "AI spinners" used with the specific intent to obfuscate AI-generated content and evade detection.
- To input personal data, confidential school information, or the intellectual property of staff or peers into public AI models, in compliance with GDPR and data protection regulations.

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.

At Houlton School we consider any unattributed use of AI-generated text or imagery to be plagiarism and will follow our plagiarism procedures as set out in our following policies: Learning and Teaching, Acceptable Use, Homework and Exam Policy.

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

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content, including but not limited to, generating inappropriate or sexualised images of pupils
- Input offensive, discriminatory or inappropriate content as a prompt

9. Formal assessments

We will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

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

10. Staff training

The Trust provides all staff with the following training, in addition to a briefing provided as part of the induction process:

- AI: The risks of Artificial Intelligence
- AI: The basics of Generative Artificial Intelligence

In addition to this Houlton School will provide:

Comprehensive Core Training: All staff receive targeted training on detecting AI plagiarism under JCQ rules, utilizing approved tools for safe workload reduction, and understanding GDPR data risks.

Senior Leadership Oversight: The Head of School holds operational responsibility for sourcing AI CPD and mapping it directly to the Academy Improvement Plan (AIP).

Subject-Specific Implementation: Faculty and Middle Leaders are responsible for filtering AI developments down into departmental contexts and tailoring tools to specific subjects.

Trust-Wide Collaboration: Staff engage with Transforming Lives Educational Trust (TLET) Professional Learning Communities to peer-review classroom pilots and evaluate digital strategies.

External Horizon Scanning: Academy leadership continuously monitors Department for Education (DfE) updates and TES research to keep policies and practices ahead of legal shifts.

Staff Briefings & Internal Sharing: Best practice, policy updates, and successful AI instructional strategies are routinely disseminated across the school via weekly staff briefings.

11. Referral to our child protection and safeguarding policy

The school 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. [Child Protection and Safeguarding Policy](#)

12. Breach of this policy

By Staff

Breach of this policy by staff will be dealt with in line with our 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 an academy device
- At home, at academy 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 academy)
- 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.

By Trustees/Governors

Trustees/Governors found in breach of this policy will be referred to the chair of the trust board.

By Pupils

Any breach of this policy by a pupil will be dealt with in line with our behaviour policy. [Positive Behaviour Policy](#)

7 – Monitoring

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 Trust Director of Operations 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 full trust board at least annually.

All central team staff are expected to read this policy. The Director of Operations is responsible for ensuring this policy is followed.

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

The Director of Operations will monitor effectiveness of AI usage across the central team.

Principals will monitor the effectiveness of AI usage across their academies.

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

8 – Related Documents

8.1 This AI policy is linked to the following policies:

- TLET Data Protection Policy
- TLET ICT Acceptable Use policy
- TLET Staff Code of Conduct policy
- TLET Equality & Diversity Policy
- Homework Policy (academy policy)
- Behaviour Policy (academy policy)