

ARTIFICIAL INTELLIGENCE (AI) POLICY & GUIDANCE

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Next Review Due: Oct 2026



1. Trust Policy Statement

Bradford Diocesan Academies Trust (BDAT) recognise the transformative potential of Artificial Intelligence (AI) in enhancing educational experiences, fostering innovation and preparing our pupils for the challenges of the digital age. It can also support the effective and efficient running of school operations, reducing workload and building on best practice. We are committed to equipping learners and staff with the skills and understanding needed to use AI responsibly, promoting digital literacy, critical thinking and safeguarding principles.

This Trust-wide policy applies to all staff, including the Board of Trustees, Governors and Central Staff, paid staff, volunteers and sessional workers, agency staff, students or anyone working for and on behalf of BDAT. As part of our focus on diversity and inclusion, BDAT pledges that our policies will seek to promote equality, fairness and respect for all staff and pupils. Our policies reflect the BDAT values of inclusion, compassion, aspiration, resilience and excellence. By working closely with a range of key stakeholders, including our schools, unions and HR colleagues, we have ensured that the Trust's policies do not unlawfully discriminate against anybody.

For the purpose of this policy, the term 'Trust' refers to BDAT. The term school and the term academy are interchangeable.

2. Introduction and Aims of the Policy

AI has the potential to transform education by enabling teachers to focus on what they do best: teaching and supporting students. This marks a shift in how we use technology to enhance lives and tap into the vast potential of AI in our classrooms, offices and central services. If used safely, effectively and with the right infrastructure in place, AI can support every child and young person, regardless of their background, to achieve and thrive at school and develop the knowledge and skills they need for life.

This ambition strongly aligns with the Trust's *Strategic Plan and Priorities 2025–2030 – Excellence for All*, particularly our commitment to provide Excellence in our Systems and Structures supporting schools. AI, when used responsibly, can play a key role in reducing workload and cost across the Trust, enabling colleagues to reinvest time and resources back into the classroom and operational areas.

However, the Trust recognises that evidence regarding the benefits and risks of generative AI, particularly pupil use, is still emerging. AI outputs can be inaccurate, biased or misleading if used without appropriate checks. For this reason, BDAT is committed to a cautious, informed and responsible approach that balances innovation with safeguarding, data protection and professional judgement.

Our primary objectives in implementing this policy are to:

- Support safe and effective use of AI to enhance teaching, learning and operations.
 - Reduce staff workload, whilst preserving professional judgement and expertise.
 - Promote equity, inclusion and accessibility through AI-driven interventions.
 - Protect privacy and personal data in compliance with GDPR and data protection legislation.
 - Ensure compliance with safeguarding, ethical and regulatory standards.
 - Encourage responsible innovation, informed by risk assessment and evidence.
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3. Legislation and Guidance

This policy adheres to relevant legislation and national guidance, including, but not limited to:

- [DfE Policy Paper – Generative artificial intelligence \(AI\) in education](#)
- [Using AI in education settings: Support materials – GOV.UK](#)
- [DfE Digital and Technology Standards](#)
- [National AI Strategy – GOV.UK](#)
- [UK GDPR & Data Protection Act 2018](#)
- [DfE - Keeping Children Safe in Education](#)
- [Joint Council for Qualifications \(JCQ\) - AI use in Assessments](#)
- [BDAT Policies](#) - GDPR and Data Protection Policy, Online Safety Policy, etc.
- [BDAT Digital Strategy – Digital vision for Excellence](#)

4. What is Generative AI?

Generative Artificial Intelligence (AI) is a type of AI technology designed to create new content, such as text, images, audio, or code, based on prompts provided by the user. These tools use 'large language models' and other advanced algorithms to generate outputs that mimic human-like creativity and reasoning.

When used appropriately, generative AI can help reduce administrative workload across the Trust, freeing up teacher and non-teacher time so they can focus on delivering high-quality teaching and learning, as well as operational delivery, compliance, planning and service improvement. It can also assist with drafting documents, summarising information and creating resources quickly and efficiently.

However, it is important to recognise the limitations and risks. AI-generated content can sometimes be inaccurate or misleading, inappropriate, biased, taken out of context, taken without permission or unreliable for decision making.

Staff must exercise professional judgment when using these tools. Generative AI can make certain written tasks quicker and easier, but it cannot replace the expertise, critical thinking and subject knowledge of a human professional. Technology, including generative AI, must never replace professional judgement, accountability or human oversight in any role.

Whilst generative AI can offer significant benefits, its use must always align with the Trust's legal, ethical and professional obligations. AI tools do not remove accountability. Staff remain fully responsible for the accuracy, suitability and lawful use of AI-generated content and for ensuring that AI use aligns with Trust policies, safeguarding requirements and professional standards.

This policy includes guidance on key areas where risks may arise. Users must take great care to comply with all requirements relating to:

- **Safeguarding** – Protecting children, young people and vulnerable adults from harm, ensuring AI use does not compromise safety or wellbeing.
- **Data Protection** – Handling personal and sensitive information in accordance with UK GDPR and the Data Protection Act 2018, including restrictions on inputting data into AI tools.
- **Intellectual Property** – Respecting copyright and licensing laws, avoiding infringement and maintaining transparency when using AI-generated content.

5. Roles and Responsibilities

This policy applies to all staff, governors and Trustees across the Trust, including central operations and individual academies. Effective and responsible use of AI requires clear accountability at every level. The following roles have specific responsibilities:

Head of Corporate Projects (Digital and AI Lead) - Oversees day-to-day management of AI use within the Trust, including policy implementation, staff guidance and monitoring compliance. Works closely with safeguarding and IT teams to identify risks and ensure safe practice. Acts as the primary point of contact for staff who are unsure about AI-related decisions.

Managed Service Partner (AIT) - Implement technical controls, including Smoothwall monitoring and filtering, to block unauthorised AI tools and maintain secure access. Supports audits and ensure systems meet DfE Digital and Technology standards.

Data Protection Officer (DPO) - Ensures all AI use complies with UK GDPR and the Data Protection Act 2018. Conducts and approves Data Protection Impact Assessments (DPIAs) for new AI tools and advises on data security and privacy risks.

Trustees and Governors - Provide strategic oversight of AI use within the Trust and schools, challenge leaders on compliance and support safe and effective implementation.

Digital Link Trustee – Provide strategic oversight and challenge to the Trust's use of AI, ensuring it is safe, ethical, compliant and aligned to safeguarding and educational priorities.

Headteacher and Senior Leadership Team (SLT) - Responsible for ensuring school-level compliance with this policy. Approves the use of AI tools within their academy, integrates AI into school improvement plans where appropriate and ensures staff receive relevant training. SLT must also escalate any concerns to the Head of Corporate Projects.

Safeguarding Leads - Monitors AI-related safeguarding risks, including inappropriate outputs, bias, or harmful content. Ensures AI use aligns with *Keeping Children Safe in Education (KCSIE)* and the Trust's safeguarding policies.

Staff - Must use only approved AI tools, verify outputs for accuracy, avoid entering personal or sensitive data and model ethical AI use. Request new AI tool use through submitting a DPIA. Staff should report any misuse or concerns immediately and seek guidance if unsure.

Pupils - Follow school guidelines for responsible AI use, attribute sources correctly and avoid misuse such as plagiarism or generating harmful content.

6. Safeguarding

The use of generative AI tools introduces potential online safety risks, including deepfakes, impersonation, inappropriate outputs and misuse of chatbots. Under no circumstances should AI compromise the safety or wellbeing of children, young people, or vulnerable adults. All AI deployment must align with the Trust's safeguarding responsibilities and statutory obligations.

To mitigate risks, AI use in classrooms and homework should be monitored and staff trained to identify AI-related safeguarding issues. Compliance with *Keeping Children Safe in Education (KCSIE)* and the Trust's Online Safety Policy is essential. Access to unsafe AI tools will be blocked or restricted.



AI tools must never create, share, or promote harmful, discriminatory, or abusive content. Outputs should be reviewed for appropriateness before use. Personal information relating to children or vulnerable individuals must not be entered into AI systems unless explicitly authorised and risk assessed.

The use of AI must never compromise safeguarding responsibilities. AI should not be used to make or automate safeguarding decisions and it must not replace professional judgement or established safeguarding processes. All concerns affecting a child's safety or wellbeing must be managed by trained staff in line with Trust procedures.

Where AI tools are used, outputs must always be reviewed by staff before being shared or acted upon. Any safeguarding concern arising from AI use, including inappropriate content, harmful bias or misuse by pupils or adults, must be reported immediately in accordance with the Trust's Safeguarding Policy. AI practices will be regularly reviewed to ensure continued alignment with *Keeping Children Safe in Education* and emerging risks.

7. Data Protection

When using generative AI tools, it is essential to consider the implications for data privacy and security. All processing of personal data must comply with relevant data protection legislation (e.g. UK GDPR, Data Protection Act 2018). Generative AI systems should never be used to process personal or sensitive data unless appropriate safeguards are in place.

Staff should be aware that inputting information into AI systems constitutes data processing. Care must therefore be taken to ensure that personal, sensitive or confidential data is not shared inappropriately. The convenience of AI tools does not override legal responsibilities under data protection legislation.

The Trust must remain transparent about any use of AI, particularly where automated decision-making or profiling is involved. Individuals should be informed if their data is processed by AI and accountability for decisions must be maintained.

Personal or confidential data must not be entered into AI tools unless a Data Protection Impact Assessment (DPIA) has been completed and approved. Wherever possible, secure, enterprise-grade platforms such as Microsoft Copilot should be used in preference to public or consumer AI tools, as they provide stronger safeguards around data use, retention and security.

It is important to maintain clear records of AI-generated content used in official documents, including the tool used, date of generation and any human review applied. Where AI supports decision-making, ensure human oversight to prevent bias or unfair outcomes. Any suspected or actual data breach involving AI must be reported immediately in line with the Trust's GDPR and Data Protection Policy.

8. Intellectual Property (IP)

Generative AI tools can create text, images, code and other outputs based on patterns learned from large datasets. Whilst these outputs may appear original, they can raise Intellectual Property (IP) and copyright concerns. The Trust and its schools must ensure that AI-generated content is used



responsibly and does not infringe on third-party rights. In practical terms, this means that schools must not allow or cause students' original work to be used to train generative AI models unless they have permission, nor should they use AI tools to reproduce or generate content that copies protected works.

AI tools must not be used to generate or copy copyrighted material (e.g. books, music, artwork) unless permission is granted or the content is in the public domain. Before publishing AI-generated content, users must confirm it does not infringe existing IP rights and that the Trust retains appropriate usage rights. As such it is important to always review AI outputs before official use and acknowledge AI involvement where appropriate to maintain transparency.

It is also important to be transparent about the role of AI in creating content. If AI has played a significant part in producing work, it should never be misrepresented as entirely human-created. Before using any AI-generated material, check the licensing terms of the platform to confirm that the Trust has the necessary rights for institutional use. To maintain accountability, keep a clear audit trail of all AI-generated outputs, noting the tool used, the date of creation and any human edits applied. Additionally, copyrighted or proprietary content must never be uploaded into AI tools without explicit permission and a full understanding of the intellectual property implications. Where uncertainty exists, such as whether an exemption applies, seek legal advice before proceeding. These measures help ensure compliance, protect the Trust's reputation and uphold ethical standards in the use of AI.

9. Approved use of AI

BDAT supports the responsible use of AI to reduce workload and improve efficiency across the Trust. AI tools can assist with drafting and administrative tasks, but they cannot replace human judgement, expertise or accountability. Staff remain responsible for the quality, accuracy and appropriateness of all work produced, regardless of whether AI has been used at any stage.

Approval of an AI tool does not imply that it is suitable for every task. Staff should exercise professional judgement in deciding whether AI use is appropriate in each context and ensure transparency where AI has contributed significantly to outputs.

Staff are encouraged to suggest new ways of using AI to improve outcomes, efficiency and service quality across teaching, learning and Trust operations, while reducing workload. Ideas should be discussed with the headteacher and the school's Digital Champion so they can be evaluated and taken forward if suitable. The headteacher is responsible for approving AI use in school or introducing new AI tools, with advice from the Head of Corporate Projects and the Deputy CFO (as the Trust's Data Protection Officer), supported by a Data Protection Impact Assessment (DPIA).

Microsoft Copilot is the Trust's approved AI tool because it operates within a closed, secure environment when accessed using MS365 BDAT login. Data processed through Copilot remains within the BDAT domain and is not used to train external AI models, significantly reducing the risk of information entering the public domain. Closed AI systems, such as Copilot, are controlled by a single provider, follow strict privacy and security standards and include safeguards against harmful content.



They are accessed through approved applications and cannot be altered by users, ensuring compliance and safety.

In addition to Microsoft Copilot, other AI tools may be approved for specific educational or administrative purposes where they meet the Trust's security, safeguarding and data protection requirements. All such tools are reviewed and authorised through the DPIA process prior to use, in accordance with BDAT's GDPR Policy. Completed forms should be submitted to the Data Protection Officer – matthew.hill2@bdac-academies.org

The Trust will maintain and publish a central list of approved AI tools, which will be kept under regular review to reflect changes in risk, functionality and national guidance. Academies and staff must not use AI tools that do not appear on this list unless explicit approval has been granted through the DPIA process. Access to unauthorised generative AI tools may be blocked on the Trust's network. Requests for new AI tools will be assessed through the DPIA process to ensure they meet compliance, safeguarding and information governance standards before being added to the approved list.

10. Use of AI by Pupils

As part of our safeguarding and child protection responsibilities, the Trust will ensure that pupils are protected from harmful online content, including material generated by AI technologies. Any AI tools introduced for educational purposes will be assessed for age appropriateness and alignment with pupils' learning needs.

The Trust is clear that AI must not undermine learning, assessment integrity or the development of pupils' independent thinking and skills.

AI technologies can present risks related to cheating and plagiarism. To mitigate these risks:

- Students must not use AI tools to complete homework or class assignments where AI-generated content is presented as their own work.
- Where AI tools are used as a source of information or support, students must clearly reference their use of AI.

The Trust will take reasonable steps to prevent malpractice involving generative AI in assessments. It will follow the latest guidance published by the Joint Council for Qualifications (JCQ) regarding [AI use in Assessments](#).

11. Training and Development

To support the safe and effective use of generative AI, the Trust, in partnership with AIT, will deliver targeted training as part of the rollout of this AI Policy. A core focus of this programme will be practical



training on the Trust's approved AI platform, Microsoft Copilot, ensuring staff understand how to use it confidently, securely and appropriately within their professional roles. Training will be relevant to all roles across the Trust, including operational, administrative and central services, and tailored where appropriate.

The training will help staff understand both the benefits and limitations of AI in education. While AI tools such as Copilot can save time and improve efficiency, they also present risks, including inaccurate or biased outputs, data protection concerns and over-reliance on technology. Training will emphasise that AI is a support tool and must not replace professional judgement, subject expertise or accountability. Staff will be guided on:

- when and how Microsoft Copilot may be used safely for a variety of tasks
- the importance of reviewing, checking and adapting AI-generated outputs before use
- the Trust's approved AI tools and the rationale for using secure, enterprise-grade platforms

The training programme will also include clear guidance on the Data Protection Impact Assessment (DPIA) process, so staff understand when a DPIA is required and how it supports the safe introduction of new AI tools. Additional guidance materials and resources will be made available online to support ongoing learning and confidence in responsible AI use.

As national guidance and technology evolve, training materials will be updated to reflect emerging best practice and staff confidence in using AI safely within their own roles, and where applicable advising pupils or colleagues, will be actively developed.

12. Monitoring

The Trust will actively monitor the use of AI tools through its IT systems and Smoothwall monitoring and filtering to ensure compliance with this policy and all relevant legal, ethical and safeguarding requirements. Smoothwall provides real-time monitoring and filtering of online activity, helping to block access to unauthorised or unsafe AI tools and detect inappropriate use. Regular audits and feedback mechanisms will help identify risks and improve practice. Staff must report any suspected misuse or breach immediately to their line manager or the Data Protection Officer. Failure to comply with this policy may result in disciplinary action in line with the Trust's conduct and safeguarding procedures.

13. Policy Review

This policy will be reviewed every 6 months by the Head of Corporate Projects, in collaboration with the Trust's Managed Service Partner (AIT). Regular reviews are essential to keep pace with rapid developments in Artificial Intelligence and to ensure the policy remains current, effective and relevant.



Updates will be aligned with any changes to the DfE's Digital and Technology Standards, as well as emerging best practice across the education sector.

If staff are ever unsure about how this policy applies in practice, or have questions regarding compliance, they should contact Mark Dowson, BDAT's Head of Corporate Projects for further guidance – mark.dowson@bdat-academies.org

