



Cornerstone Academy Trust

Artificial Intelligence (AI) Policy

Trust-wide policy for pupils, staff and the wider school community

Policy owner	Trust IT Lead
Approval body	Board of Trustees
Updated	October 2026
Review cycle	Annual, or earlier following a change in law or guidance
Next review	Autumn Term 2027 or earlier if legislation, statutory guidance or technology materially changes
Applies to	All schools and operations of Cornerstone Academy Trust

Purpose

This policy establishes the Trust framework for the safe, ethical, transparent and responsible use of artificial intelligence in teaching, learning, administration, governance and Trust operations.

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1. Introduction and purpose

1.1 Artificial Intelligence (AI) is increasingly used within education and wider society. AI includes systems capable of performing tasks that would ordinarily require human intelligence. Generative AI refers to technology that can generate new content, including text, images, audio, computer code and video.

1.2 Generative AI presents significant opportunities to support teaching, learning and school administration. It also creates risks relating to safeguarding, accuracy, bias, intellectual property, academic integrity, data protection, information security and inappropriate reliance on automated outputs.

1.3 Cornerstone Academy Trust (the Trust) supports the safe, ethical, transparent and responsible use of AI where it can:

- enhance teaching and learning;
- improve educational outcomes and experiences for pupils;
- support staff workload and productivity;
- improve administrative and operational efficiency;
- support appropriate personalisation of teaching and learning;
- develop pupils' and staff members' AI literacy;
- help pupils understand the opportunities and limitations associated with AI; and
- prepare pupils effectively for life and work in a society in which AI is increasingly prevalent.

1.4 The Trust will use AI in accordance with applicable legislation and statutory guidance, including UK data protection legislation, the Data Protection Act 2018, the Data (Use and Access) Act 2025, the Equality Act 2010, copyright and intellectual property legislation, Keeping Children Safe in Education 2026 and relevant Department for Education and regulatory guidance.

1.5 The Trust recognises that AI technology and the regulatory framework surrounding it are developing rapidly. This policy will therefore be reviewed at least annually and sooner where significant legislative, regulatory, technological or safeguarding developments make that necessary.

1.6 The Trust will adopt a human-centred approach to AI. AI may support professional practice and decision-making but will not replace appropriately qualified professional judgement where decisions affect pupils, employees or other individuals.

1.7 The Trust will be appropriately transparent about its use of AI. Where AI involves the processing of personal data, relevant privacy information will explain the processing as required by applicable data protection legislation.

2. Scope

2.1 This policy applies across all schools and operations of Cornerstone Academy Trust.

2.2 It applies to employees, agency and temporary staff, Trustees and Members where applicable, volunteers, consultants, contractors, trainee teachers and other adults working on behalf of the Trust, and pupils when using AI as part of Trust-authorized activities.

2.3 This policy applies to AI accessed through Trust devices or networks, using Trust accounts, as part of Trust business, in teaching and learning, in administration, management or governance, or where Trust, staff, pupil or stakeholder information is processed.

2.4 This policy should be read alongside the Trust's Child Protection and Safeguarding, Online Safety, Data Protection, Information Security/Cyber Security, Acceptable Use, Staff Code of Conduct, Pupil Behaviour,

Equality, Curriculum, Assessment/Feedback and Marking, Records Management and Retention policies and relevant privacy notices.

3. Governance and responsibilities

3.1 Board of Trustees

The Board of Trustees has overall responsibility for ensuring appropriate governance arrangements are in place for the Trust's use of AI and will receive appropriate assurance that material AI risks are being identified and managed.

3.2 Executive leadership

Executive leaders are responsible for ensuring that appropriate AI governance arrangements operate across the Trust, staff understand their responsibilities, appropriate training is provided, only appropriately assessed and approved AI systems are used for Trust purposes, and significant risks or incidents are escalated appropriately.

3.3 AI Lead

The Trust will designate an appropriate AI Lead responsible for coordinating the development and implementation of the Trust's approach to AI. The AI Lead will work with the Data Protection Officer, Designated Safeguarding Leads, IT staff and Trust leadership as appropriate.

3.4 Data Protection Officer

The Data Protection Officer (DPO) will advise the Trust on the data-protection implications of AI systems and provide advice concerning Data Protection Impact Assessments (DPIAs) where appropriate.

3.5 Designated Safeguarding Leads

Designated Safeguarding Leads will ensure that safeguarding concerns involving AI are managed consistently with the Trust's Child Protection and Safeguarding Policy and Keeping Children Safe in Education.

3.6 IT leads

The Trust's IT leads will advise on technical security, access controls, system configuration and other relevant information-security considerations.

3.7 All staff

All staff must comply with this policy, only use AI systems authorised for the relevant Trust purpose, protect personal and confidential information, exercise professional judgement, verify AI-generated information appropriately, undertake required training and report concerns promptly.

4. Approval and procurement of AI systems

4.1 AI systems must be appropriately assessed before being introduced for Trust use. The extent of assessment will be proportionate to the nature, purpose and risks of the proposed AI use.

4.2 Assessment should consider, where relevant:

- educational or operational purpose;
- safeguarding and age appropriateness;

- data protection and privacy;
- information and cyber security;
- accessibility and equality;
- potential bias;
- intellectual property;
- contractual terms and data retention;
- whether information may be used to train AI models;
- human oversight;
- accuracy and reliability; and
- supplier arrangements.

4.3 Where proposed processing is likely to result in a high risk to individuals, an appropriate DPIA will be completed before processing begins.

4.4 The Trust will maintain an Approved AI Tools Register identifying, as appropriate, the application, system owner, authorised users, approved purposes, permitted categories of information, restrictions on use, risk/DPIA status and review arrangements.

4.5 Approval of an application does not mean that it may be used for every purpose or with every category of information. Users must comply with restrictions specified by the Trust for that application.

5. Use of AI by staff

5.1 Staff may use approved AI applications for authorised professional purposes. Possible uses include developing teaching resources, lesson planning, generating ideas, producing initial drafts of communications, administrative support, summarising non-confidential material, creating learning activities, supporting assessment and feedback where appropriate, and analysing appropriately authorised information.

5.2 The member of staff using AI remains professionally accountable for the resulting work. AI-generated material must not automatically be assumed to be accurate, complete, current, unbiased, appropriate, legally compliant or suitable for a particular pupil or purpose.

5.3 Staff must exercise appropriate professional judgement and review AI-generated material before relying upon, sharing or publishing it. Important factual, legal, safeguarding, curriculum or assessment information must be appropriately verified.

5.4 AI may assist staff with curriculum and resource development, differentiation, scaffolding, questioning and activity design. Professional judgement remains central to determining what is educationally appropriate.

5.5 AI may assist with assessment or feedback where the Trust has authorised the particular use. AI-generated marks, judgements or feedback must be subject to meaningful professional oversight appropriate to the assessment concerned.

5.6 AI may be used to assist in drafting pupil reports where an approved system and process are used. The responsible member of staff must review the final report and ensure that it accurately reflects the pupil and the staff member's professional judgement.

5.7 Staff must not present unverified AI-generated information as established fact.

6. Personal, sensitive and confidential information

6.1 Staff and pupils must not enter personal, special category, safeguarding, confidential or commercially sensitive information into an AI system unless the system and proposed processing have been expressly approved by the Trust for that category and purpose.

6.2 Where personal data is processed through AI, the Trust will identify and document an appropriate lawful basis under applicable UK data-protection legislation. Where special category information is processed, the Trust will identify any additional legal condition required.

6.3 Only the minimum information reasonably necessary for the approved purpose should be processed. Information should be anonymised or pseudonymised wherever appropriate and practicable.

6.4 Removing a person's name does not necessarily make information anonymous. Staff should consider whether an individual could still reasonably be identified from other information supplied.

6.5 Particular care must be exercised with safeguarding information, SEND information, health and medical information, disability information, ethnicity or religious information, biometric data, behaviour records, employee HR data, photographs, video and audio, assessment information and confidential organisational or commercially sensitive information.

7. Automated decision-making and human oversight

7.1 AI should support, rather than replace, meaningful human professional judgement.

7.2 The Trust will not use AI as the sole basis for a decision having legal or similarly significant effects upon an individual except where this is lawful and all applicable safeguards have been established.

7.3 Particular caution and meaningful human oversight must apply where AI informs decisions concerning safeguarding, admissions, suspensions or exclusions, assessment, SEND, pupil interventions, attendance, recruitment, employee performance, capability or discipline, absence management, remuneration or employment decisions.

7.4 Where required by law, individuals will be provided with appropriate information about automated processing and applicable rights to human intervention or challenge.

8. Use of AI by pupils

8.1 The Trust recognises the importance of developing pupils' understanding of AI and their ability to use technology safely, critically and responsibly.

8.2 Pupils may use AI for educational purposes where the AI application has been approved by the Trust, the use is appropriate to the pupil's age and needs, applicable age requirements have been considered, the activity has been authorised by an appropriate member of staff, and suitable supervision and safeguarding controls are in place.

8.3 Pupils will be taught that AI-generated information may be inaccurate, misleading, biased or fabricated and should not automatically be regarded as authoritative.

8.4 Pupils must not input personal, sensitive or confidential information into AI tools unless explicitly instructed to do so through an approved system and activity.

8.5 Teaching about AI should, at an age-appropriate level, develop understanding of how AI works, appropriate and inappropriate uses, misinformation, bias, privacy, intellectual property, safeguarding, manipulation and impersonation, critical evaluation of outputs and responsible digital citizenship.

9. Safeguarding and online safety

9.1 Safeguarding remains paramount in all uses of AI. The Trust's use of AI will align with its responsibilities under Keeping Children Safe in Education 2026 and its wider approach to online safety.

9.2 Staff and pupils will be made appropriately aware that AI may be misused to create or facilitate false or misleading material, impersonation, manipulated images, audio or video, deepfakes, harmful content, scams, fraud and other behaviour creating safeguarding or online-safety concerns.

9.3 Where AI-generated or AI-manipulated material gives rise to a safeguarding concern, staff must follow the Trust's safeguarding procedures and refer the concern promptly to the Designated Safeguarding Lead or deputy as appropriate. Such incidents must not be treated solely as IT, behaviour or disciplinary matters where a safeguarding concern is present.

9.4 AI systems used by pupils must be considered within the Trust's wider online-safety, filtering and monitoring arrangements.

10. Academic integrity and pupil work

10.1 The Trust will teach pupils how AI can appropriately support learning without replacing their own thinking, knowledge, creativity or development.

10.2 Teachers should make clear when AI may be used, may be used subject to conditions, or must not be used for a particular piece of work or assessment.

10.3 Where required by the teacher or relevant assessment rules, pupils must appropriately acknowledge the use of AI.

10.4 Pupils must not use AI to misrepresent AI-generated work as entirely their own where doing so would amount to academic misconduct.

10.5 Staff should use appropriate assessment approaches to establish pupils' knowledge and understanding rather than relying solely on methods vulnerable to inappropriate AI assistance.

11. Equality, bias, accuracy and fairness

11.1 AI systems may generate incorrect, misleading or biased results.

11.2 Staff must consider whether outputs could unfairly disadvantage individuals or groups and must not assume that AI-generated recommendations are neutral merely because they were generated by technology.

11.3 The Trust will have regard to its responsibilities under the Equality Act 2010 when assessing or using AI systems.

11.4 Where AI may materially influence decisions affecting individuals, consideration should be given to accuracy, bias, fairness, representativeness, accessibility, human oversight and the potential impact upon affected individuals.

12. Intellectual property and copyright

12.1 The use of AI does not remove obligations relating to copyright and intellectual property.

12.2 Staff and pupils must not knowingly use AI to infringe another person's intellectual property rights.

12.3 Particular care must be taken before uploading pupil work, staff-created resources, photographs, published resources, licensed materials or third-party copyrighted content to an AI system.

12.4 Where appropriate, users should check usage and licensing conditions before publishing, reproducing or commercially exploiting AI-generated materials.

12.5 Trust confidential or proprietary information must not be uploaded to an AI system unless the processing has been specifically approved.

13. Data Protection Impact Assessments

13.1 New AI tools and materially different uses of existing AI tools will be considered through the Trust's appropriate approval and risk-assessment process.

13.2 Where required, a DPIA will consider the nature, scope, context and purpose of processing; necessity and proportionality; lawful basis; risks to individuals; children's particular vulnerability; special category information; accuracy; fairness and bias; transparency; security; data minimisation; retention; data transfers where applicable; human involvement; automated decision-making; individual rights; supplier arrangements; and measures to mitigate identified risks.

13.3 The DPO should be consulted where required as part of this process.

14. Cyber and information security

14.1 AI systems must be operated consistently with the Trust's information-security arrangements.

14.2 Appropriate security measures may include access controls, secure authentication, appropriate system configuration, security updates, contractual safeguards, restrictions on categories of data, monitoring, incident-management arrangements and periodic review.

14.3 Users must remain vigilant to cyber threats involving AI, including impersonation and deceptive or manipulated communications.

14.4 Any suspected cyber-security or personal-data incident connected with AI must be reported immediately through the Trust's established reporting procedures.

15. Transparency

15.1 The Trust will take reasonable steps to ensure appropriate transparency about material uses of AI.

15.2 Where AI entails the processing of personal data, the Trust will ensure that relevant privacy information addresses the processing as required by applicable law.

15.3 Where appropriate, staff should explain significant AI involvement in content or processes so those receiving or relying upon the information are not materially misled about its origin.

16. Staff training and AI literacy

16.1 Staff who use AI for Trust purposes will receive appropriate information, instruction or training relevant to their use.

16.2 Training should include, as appropriate, permitted AI systems, data protection, safeguarding, cyber security, confidentiality, hallucinations and accuracy, bias and discrimination, intellectual property, appropriate human oversight, academic integrity and procedures for reporting concerns.

16.3 Staff have a responsibility to seek advice where they are unsure whether a proposed use of AI is permitted.

17. Reporting concerns and incidents

17.1 Concerns concerning the use or misuse of AI should be reported promptly through the relevant Trust procedure. Depending upon the nature of the concern, this may include referral to the Designated Safeguarding Lead, DPO, AI Lead, IT support/security, Headteacher or appropriate Trust executive leader.

17.2 Suspected personal-data breaches must be handled in accordance with the Trust's data-breach procedures.

17.3 Safeguarding concerns must be dealt with under the Trust's safeguarding procedures irrespective of whether AI was responsible for creating, modifying or distributing the material concerned.

18. Breaches and misuse

18.1 Use of AI contrary to this policy may result in investigation under the relevant Trust procedure.

18.2 For employees, deliberate or serious misuse may be considered under the Trust's disciplinary procedures where appropriate.

18.3 Pupil misuse will be considered in accordance with the Trust's Behaviour Policy and safeguarding procedures as appropriate.

18.4 The Trust will consider the individual circumstances of an incident and whether further action, support, safeguarding intervention or regulatory notification is required.

19. Review and monitoring

19.1 The Trust will monitor developments in AI, legislation, Department for Education guidance, safeguarding guidance and relevant regulatory guidance.

19.2 This policy will be formally reviewed at least annually and earlier where developments require a material change.

19.3 The Approved AI Tools Register may be updated separately from this policy as individual systems are approved, withdrawn or have restrictions changed.

Appendix 1: Core rules for staff

Before using AI, STOP and check:

- 1. Is the tool approved?** Only use AI systems approved by Cornerstone for the intended purpose.
- 2. What information am I entering?** Do not enter personal, safeguarding, special category, confidential or commercially sensitive information unless expressly authorised.
- 3. Is AI appropriate for this task?** AI should support, not replace, professional judgement.
- 4. Have I checked the output?** AI can produce inaccurate, outdated, biased or fabricated information.
- 5. Could this affect a pupil or employee?** Maintain meaningful human oversight, particularly for significant decisions.
- 6. Is there a safeguarding concern?** Report it immediately through the normal safeguarding process.
- 7. Am I unsure?** Stop and seek advice from the relevant AI Lead, DPO, DSL or IT lead before proceeding.

Appendix 2: Approved AI Tools Register

Tool	Approved users	Approved purpose	Data restrictions	DPIA / risk status	Owner / review
Microsoft Copilot	Staff and pupils	Trust-designated corporate AI solution for authorised teaching, learning, administration and operational purposes.	Use Trust-managed accounts and approved configurations. Personal, special category, safeguarding, confidential or commercially sensitive information only where expressly approved for the specific purpose. Apply data minimisation.	Corporately approved. DPIA/risk assessment status to be recorded and reviewed for the approved use.	Trust IT Lead / annual review, or earlier if the service, terms, risks or approved uses change.
ChatGPT	Teaching staff	Support professional work, including the evaluation of anonymised pupil work.	Anonymised pupil work only. Do not enter identifiable pupil information, special category data, safeguarding information, confidential information or commercially sensitive information.	Corporately approved for the stated purpose. DPIA/risk assessment status to be recorded and reviewed.	Trust IT Lead / annual review, or earlier if the service, terms, risks or approved uses change.
No More Marking	Authorised teaching and assessment staff	Assessment of anonymised pupil work.	Anonymised pupil work only. Do not include information that could reasonably identify a pupil unless a separately approved process expressly permits it.	Corporately approved for the stated purpose. DPIA/risk assessment status to be recorded and reviewed.	Trust IT Lead / annual review, or earlier if the service, terms, risks or approved uses change.

Tool	Approved users	Approved purpose	Data restrictions	DPIA / risk status	Owner / review
GL Assessment	Authorised staff and pupils	Online assessment of pupils' reading, writing and mathematical abilities.	Process only the minimum pupil information required through the approved Trust account and assessment process. No use beyond approved assessment purposes.	Corporately approved for the stated purpose. DPIA/risk assessment status to be recorded and reviewed.	Trust IT Lead / annual review, or earlier if the service, terms, risks or approved uses change.

Policy history

Version	Summary of change	Created / amended by	Approval	Implementation
October 2026	Full review reflecting updated DfE AI guidance, KCSIE 2026, data protection, safeguarding, human oversight and AI governance.	Anthony Lees	Full Trust Board	October 2026