



# Oxford Diocesan Bucks Schools Trust (ODBST)

*"Empowering our unique schools to excel"*



## ODBST Artificial Intelligence (AI) Policy for Staff

<p><b>ODBST Level 1 Statutory Policy:</b></p>	<p><b>ALL</b> Schools require this policy with <b>no changes</b> allowed to core text. No changes are necessary to personalise this with school name and branding, as this is a Trust level policy for use, without change, by all schools, <b>except</b> where a school contact is required as identified in the content of the policy. LGBs will <b>note</b> adoption in LGB meetings. Review will take place at Trust level, and schools will be notified of updates and review dates as necessary.</p>
<p><b>Other related ODBST policies and procedures:</b></p>	<p>Data Protection Policy Diversity, Equity and Inclusion Policy Code of Conduct Policy Data Protection Policy Privacy Policy for staff. E Safety Policy</p>
<p><b>Committee responsible:</b></p>	<p>FRAPP</p>
<p><b>Approved by:</b></p>	<p>FRAPP</p>
<p><b>Date Approved:</b></p>	<p>Summer term 2025</p>
<p><b>Review Date:</b></p>	<p>Summer term 2026</p>

## 1. Background to the policy

Although Data Protection law does not specifically define or discuss the guidelines for Artificial Intelligence ('AI'), the guidance from the Information Commissioner's Office and the UK government defines it as using non-human systems to imitate human intelligence.

In this time of constant development and increased usage, there is a need to provide staff with guidelines for use and to recognise an employer's right to monitor such usage. We have also set out expectation on AI usage by staff.

## 2. Introduction

The use of AI is transforming the way individuals are working. Informed and responsible use of AI has the potential to increase efficiency and improve decision making.

With these benefits come potential risks, including data protection breaches, the protection of confidential information, ethical considerations, and compliance with wider legal obligations.

We permit the informed and responsible use of authorised AI applications by ODBST staff, in carrying out specific and authorised tasks. This policy must be complied with when using AI to carry out such tasks.

The purpose of this policy is to set out our rules on the use of AI in the workplace and how it should be adopted by staff to ensure we maximise the benefits of AI while minimising any risks or concerns. Where personal data is used with AI applications, an ICO risk assessment and/or data protection impact assessment ('DPIA') has been carried out to ensure transparency in how AI will be used and what mitigating steps have been taken to reduce any potential risk of harm to pupils, staff and any other data subjects whose data might be shared with the authorised systems.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

## 3. What is meant by generative AI?

There is no single definition of AI. Broadly speaking, it is the simulation of human intelligence in machines, generally computer systems.

AI tools can learn, problem solve, make decisions and understand language. This can be contrasted with non-AI pre-programmed tools, which generally apply the same set of rules each time unless a human intervenes to update the rules. An AI tool can learn and adapt without human intervention.

There are several types of AI, including generative, predictive and extractive:

*Generative AI* – An AI tool that generates new, realistic content in the form of text, audio, computer code, data or images, etc. For example, using an AI tool to:

- Generate a marketing blog post;
- Improve an email you have already written;
- Write a product description or job description;
- Write a script or slides for a presentation;
- Check, amend and improve your grammar, spelling and writing style;
- Summarise a report or large block of text;
- Power sophisticated chatbots; or
- Write software code or find common bugs in code

*Predictive AI* – An AI tool that analyses data to make predictions, e.g. about:

- Behaviour of pupils; or
- How busy the office will be at any particular time.

*Extractive AI* – An AI tool that extracts data from the dataset it has been training on (but can't create data).

This policy focuses on generative AI, but it also applies more broadly to all forms of AI used for school business. ODBST Schools will predominantly use the following systems:

- Claude AI
- Microsoft Co-Pilot
- The Key GPT
- ChatGPT

Permission of other AI must be requested from the Operations Team using:  
MAToperations@odbst.org

#### **4. Pupil usage of AI**

As part of this policy, staff should be aware of how the trust (ODBST) permits limited pupil usage of AI applications in accordance with the AI policy for pupils. It is important to monitor pupil usage whilst in class and for homework to ensure compliance with this policy or how to monitor when reviewing homework.

For pupils, they must sign an Acceptable Use Statement to ensure appropriate usage of AI, and they are reminded of the permitted usage along with an outline of what classes as AI misuse.

The school permits pupil usage of AI in the following circumstances:

- As a research tool
- Idea generation for projects
- For use with coursework or homework with the above requirements fulfilled, only when agreed in advance with the teacher.
- List any other authorised usage: Creation of images, correction of spelling and punctuation

Examples of AI misuse include, but are not limited to, the following:

- Copying or paraphrasing sections of AI-generated content so that the work is no longer the pupil's own;
- Copying or paraphrasing whole responses of AI-generated content;
- Using AI to complete parts of the assessment so that the work does not reflect the pupil's own work, analysis, evaluation or calculations;
- Failing to acknowledge use of AI tools when they have been used as a source of information or to show it has been used to correct spelling and punctuation;
- Incomplete or poor acknowledgement of AI tools; or
- Submitting work with intentionally incomplete or misleading references.

#### **5. Authorised AI applications**

The school allow access to the following AI applications for business purposes such as finding contractual information, summarising data, writing letters, finding information, organising data: Claude.AI, ChatGPT, The Key GPT, Microsoft Co Pilot

The listed AI applications may be updated at any time. Should staff wish to use another AI application not listed, they must contact in writing the COO, Rachael Hollinshead to review permission to do so.

#### **6. Authorised usage of AI for staff**

Authorised AI applications must only be used by staff for the following business purposes:

- Drafting guidance, letters, marketing, training materials and presentations;
- Lesson planning

- Customising materials (simplifying language, adjusting to different reading levels, creating tailored activities for different interests)
- Creating illustrations
- Conducting research
- Developing code
- Providing summaries
- Help with design of quiz questions or other exercises
- To give pupils feedback on their work to improve
- Processing large amounts of information that has been collected to identify key themes/matters arising
- Idea generation
- Report writing
- Initial analysis of data where no personal, confidential or sensitive information is inputted
- Assisting with communication internally and externally
- Drafting meeting minutes
- Generating costed services timetables or plans based on redacted or anonymised information
- Formulating policies and procedures - the quality and content of the final document remains the professional responsibility of the person who produced it.
- All other purposes must be authorised in advance by asking your school GDPR lead who can seek guidance from the ODBST Operations team and the data protection officer (Judicium).

The DPIA for the trust acknowledges that paid for CoPilot for M365 licences pose a much smaller risk to personal data than free systems, and are subject to the same protections as school accounts. As such the Trust accepts that the list of authorised activities may broaden for use on this application to include:

- Assistance with pupil marking
- Contract reviews and criteria
- More detailed analysis of data to include school specific data
- Other purposes not listed here

Any schools using a paid for CoPilot licence should contact the ODBST Operations Team to discuss their proposed use, in turn and in conjunction with the data protection officer (Judicium), appropriate steps and discussion can be taken to ensure the usage is appropriate.

Before using any AI applications, staff will be provided training to ensure human reviewers (those who conduct monitoring of these applications) have a correct understanding and do not add any bias into the AI systems.

## **7. Data Privacy**

The school are yet to permit or encourage the usage of AI to process personal data at this time but are aware of the data protection responsibilities to be transparent of such usage and will update the policy as and when needed.

## **8. Guidelines for staff on using generative AI tools and platforms**

You must not use generative AI tools other than in accordance with the list above. If you wish to use another generative AI tool, you should contact The ODBST Operations Team

(matoperations@odbst.org) to ask whether the AI tool can be added to the list and/or whether you can be given authority to use it.

You must not share your access credentials or allow others to use generative AI tools on your behalf. You must not use generative AI in any way that could be considered discriminatory or could give rise to defamation, harassment, intimidation or bullying or in any way that could harm the reputation of another.

You must not use generative AI to create illegal content or for illegal purposes.

You must not use offensive, obscene or abusive language, graphics or imagery when inputting content into generative AI and must not attempt to create content which is offensive, obscene or abusive through your use of generative AI tools.

Unless specifically authorised to do so, you must not input into a publicly-accessible generative AI tool:

- The schools or Trust trademarks, brands, logos or any other identifying material unless this document is already publicly accessible
- The schools name, email or other contact details (other than where required to input your work email address);
- Propriety school information;
- School materials or data;
- Trade secret, confidential or valuable information;
- Usernames, passwords (other than for the AI tool itself) and security tokens; or
- Personal data, i.e., information or data from which any living individual can be identified— including personal data relating to employees, parents, pupils, governors, suppliers and unconnected third parties.
- To redact data

When using generative AI in the workplace, you must always use your company email address to create and log in to any generative AI account (do not use your personal email address or login credentials).

You must protect your login credentials and ensure any generative AI accounts that you hold are not accessible to unauthorised third parties. The use of multi-factor authentication is advised in respect of any generative AI tools and technologies used.

## **9. Personal use of generative AI**

You must not use the company's computers, networks or systems (including via smartphones or tablets) to access generative AI tools for personal use at any time.

Any unauthorised use of generative AI is strictly prohibited. Permission to use the company's systems to access generative AI tools for personal use may be withdrawn at any time at the company's discretion.

## **10. Implementation**

In order to implement this policy, the Trust will satisfy itself that its schools/academies will:

- Conduct a thorough assessment of the Academy's needs and objectives to determine the most suitable AI tools for implementation.
- Provide training and professional development opportunities for staff to enhance their understanding and utilisation of AI tools.
- Ensure all staff undertake their Cyber security training in a timely fashion as generative AI could increase the sophistication and credibility of attacks.

## **11. Monitoring**

We reserve the right to monitor all content on any AI applications used for business purposes. This will only be carried out by the school to comply with a legal obligation or for our legitimate business purposes, in order to:

- prevent misuse of the content and protect confidential information (and the confidential information of our pupils, staff or other stakeholders); ensuring the use of AI is as safe as it can be for children and vulnerable adults.
- ensure compliance with ODBST rules, standards of conduct and policies;
- monitor performance at work;
- ensure that staff do not use AI for any unlawful purposes or activities;
- comply with legislation for the protection of intellectual property rights;
- Evaluating the impact of AI tools on teaching and learning outcomes.
- Collecting feedback from staff, pupils, and parents regarding their experiences with AI tools.
- Updating the AI policy as and when required if more than annually in accordance with any changes in legislation or advancements in AI technology.

## **12. Breach of this policy**

Breach of this policy may, where appropriate, result in disciplinary action up to and including dismissal or termination of your employment or engagement with us.

Where disciplinary action is appropriate, it may be taken whether the breach is committed during or outside normal hours of work and whether or not use of AI is on an individual's own device or one of our devices, and whether at home, in the office or from a remote working location.

All ODBST staff and pupils are required to assist with any investigation into a suspected breach of this policy. This may involve providing ODBST with access to AI applications,(whether or not this is an authorised application)] and any relevant passwords and login details.

All ODBST employees must report any breach of this policy immediately to your line manager **OR** the GDPR Lead/IT Lead in the first instance. If this breach includes a data breach this must be reported to the Trust DPOI service.

**Appendix A – Acceptable Use Statement – Staff usage of AI**

This Acceptable Use Statement is designed to ensure appropriate use of AI by staff, ensuring it is consistent with the schools permitted usage detailed within the AI staff policy.

AI tools can only be used as set out within this policy and any additional usage will be reviewed and updated within the policy.

I confirm that I have read, understand, and will comply with the terms of this Acceptable Use Statement relating to the use of AI.

Signed: .....

Dated: .....

Print Name: .....