



Nexus Education Schools Trust

Artificial Intelligence (AI) Policy

For all member Schools

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Contents

1. Aims and scope	3
2. Legislation	3
3. Regulatory principles	4
4. Roles and responsibilities	4
5. Use of AI by staff across the Trust, trustees and local governors	6
6. Educating pupils about AI	8
7. Use of AI by pupils (Primary Phase)	8
8. Formal assessments	9
9. Staff training	9
10. Referral to our child protection and safeguarding policy	9
11. Breach of this policy	9
12. Monitoring and transparency	10
13. Links with other policies	10
Appendix 1: Approved uses of AI tools (table)	12

1. Aims and scope

Here at NEST, 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 trust community.

This policy covers the use of AI tools by staff across the trust, trustees, local committee members and pupils. This includes generative chatbots such as ChatGPT, Microsoft Copilot 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 across the trust to explore AI solutions to improve efficiency and reduce workload.
- Prepare staff across the trust, trustees, local committee members 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 across the trust, trustees, local committee members and pupils.
- Protect the privacy and personal data of all staff across the trust, trustees, local governors and pupils 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 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

As a trust, 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 board of trustees, local committees 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 Trust-level AI lead

Our generative AI trust lead is Lee Pender, Head of Training and Development. They are responsible for the strategic oversight of AI use across the Trust.

4.1 Board of trustees

The board of trustees will:

- Take overall responsibility for monitoring this policy and holding school leaders to account for its implementation in line with the trust's AI strategy.
- Review and update the AI policy as appropriate, and at least annually.
- Ensure school leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the trust.
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the data protection officer (DPO) and AI lead.

Trustees will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools (see section 5 and appendix 1).
- Seek advice from the data protection officer / IT / AI lead/designated safeguarding leads (DSLs), 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 School leaders

School leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their school.
- 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 and the school's 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.

4.3 Trust data protection officer (DPO)

The trust-level 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 Lisa Mardle and is contactable via email at: office@nestschools.org

4.4 Designated safeguarding leads (DSLs)

DSLs are 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 school devices.

4.5 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 5 and appendix 1).
- Seek advice from the Data Protection Officer / IT lead / AI lead / DSL, as appropriate.
- Report safeguarding concerns to the DSL in line with the trust'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 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.

4.6 Pupils

Pupils must:

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

5. Use of AI by staff across the Trust, trustees and local governors

5.1 Approved use of AI

At NEST, we are committed to helping staff, trustees and local committee members 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 documents remain 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 or local committee member using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, trustees or local committee members 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.

The table in Appendix 1 sets out the approved AI tools and the approved uses for each tool.

5.2 Process for approval

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

Before any new AI tool or significant new use of an existing tool is approved, a Data Protection Impact Assessment (DPIA) must be completed and reviewed by the data protection office (DPO). The DPIA will assess potential risks to personal data, fairness, and compliance with UK GDPR. Approval will only be granted once the DPIA confirms that risks have been mitigated to an acceptable level.

Lee Pender is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the DPO and the findings of the DPIA.

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.

All approved AI tools must have a current DPIA on file. Staff must not use any AI tool for processing personal or sensitive data unless:

- The tool is listed in Appendix 1 as approved, and
- The DPIA confirms its safety for that purpose

If personal and/or sensitive data is entered into an unauthorised generative AI tool, NEST 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.

Use of pupil images and likenesses:

The Trust does not permit the use, upload, generation, or publication of identifiable images of pupils on publicly accessible platforms, including school websites, social media, or AI-generated content.

For the purposes of this policy, “identifiable” includes any image where a pupil’s face, distinguishing features, or contextual information could reasonably lead to identification.

Staff must ensure that any digital or AI-assisted content uses only:

- Non-identifiable imagery (e.g. obscured faces, staged stock imagery), or
- Images generated without reference to real pupils

This position reflects safeguarding best practice and the Trust’s commitment to minimising risks associated with online image use.

5.4 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.

NEST 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.

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.

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

We will 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.

5.6 Raising concerns

We encourage staff to speak to their school leader in the first instance if they have any concerns about the potential 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 the school’s trust’s child protection and safeguarding policy.

5.7 Ethical and responsible use

NEST will always:

- Use generative AI tools ethically and responsibly.
- Remember the principles set out in our trust's equality 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 members, trustees and local committee members 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
- Upload, generate, or publish identifiable images of pupils using AI tools or digital platforms intended for public access

6. Educating pupils about AI

Here at NEST, 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 best use of generative AI.

Pupils are taught about the potential benefits of using AI tools to aid their learning, while also covering subjects such as:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked
- Online safety to protect against harmful or misleading content

7. Use of AI by pupils (Primary Phase)

In our schools, we recognise that Artificial Intelligence (AI) can support learning when used carefully and responsibly. However, most generative AI tools (such as ChatGPT, Microsoft Copilot, or DeepSeek) are age-rated 13+ or above, so primary-aged children will not be asked to use these tools independently.

Instead, children will:

- Learn about AI as a concept in computing and digital literacy lessons, for example exploring how digital assistants or image recognition work.
- See AI demonstrated by staff in age-appropriate contexts (e.g. a teacher showing how AI creates an image in art or explaining how a translation tool works).
- Discuss the limitations of AI, including that AI may '*hallucinate*' (make up information that sounds correct but is not), so it cannot be trusted as a sole source of truth. (This one is really important in terms of the KCSiE with regards to misinformation and disinformation).
- Explore responsible use of technology, linking to our wider curriculum on online safety, critical thinking, and digital citizenship.

Children will not:

- Be asked to use AI tools at school.
- Be asked to use AI tools at home for homework or classwork.

- Enter personal information, photos, or school data into AI platforms.

All use of AI in lessons will be staff-directed, and age-appropriate, in line with our safeguarding responsibilities. As set out in *Keeping Children Safe in Education (2025)*, schools must ensure that online tools are safe, developmentally appropriate, and used with appropriate filtering and monitoring.

8. Formal assessments

NEST 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](#).

9. Staff training

Staff training provides staff with a comprehensive knowledge and understanding of:

- How staff ensure they have a good understanding of AI.
- Covering AI use on safe internet use and online safeguarding.
- Ensuring staff have access to continuing professional development (CPD) opportunities on AI.

10. Referral to our child protection and safeguarding policy

The trust 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 trust's child protection and safeguarding policy and child protection referral process.

The Trust recognises that the creation, use or publication of identifiable pupil images – including via AI tools – may increase risks relating to online exploitation, misuse, or unauthorised data capture.

As such, the Trust adopts a precautionary approach and prohibits the use of identifiable pupil images in publicly accessible digital environments.

11. Breach of this policy

11.1 By staff

Breach of this policy by staff will be dealt with in line with the trust's 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 a school device.

- At home, at school 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 the trust with access to:

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

You must report any breach of this policy, either by you or by another member of staff, to your senior leader immediately.

11.2 By trustees or local committees

Where Trustees or local committee members are found in breach of this policy, this will be handled in line with the NEST Code of Conduct.

11.3 By pupils

Any breach of this policy by a pupil will be dealt with in line with the trust's 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 the trust 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 board of trustees at least annually.

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

The AI Lead will monitor the effectiveness of AI usage across the trust.

We will ensure we keep members of the trust 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 across the schools in our trust.

13. Links with other policies

This AI policy is linked to our:

- Assessment policy
- Behaviour policy
- Child protection and safeguarding policy
- Data protection policy
- Equality policy
- Homework policy
- ICT acceptable use policy
- Marking and feedback policy
- Online safety policy
- Staff code of conduct

Appendix 1: Approved uses of AI tools (table)

This appendix is a live document which is regularly reviewed and updated.

Last reviewed by AI trust lead on 23.06.26

While these AI tools can assist with generating content and improving efficiency, users remain responsible for verifying the accuracy and reliability of all outputs. Always cross-check critical information before acting on it.

To ensure GDPR compliance:

- Do not input personal, sensitive, or confidential data into any AI tool
- Staff must never input identifiable pupil work (e.g. essays or marked assignments) unless the tool is an approved closed system with a Data Processing Agreement (DPA) and a completed Data Protection Impact Assessment (DPIA)

All AI-generated content must comply with copyright and intellectual property law.

Pupil imagery and identifiability

In line with Trust safeguarding expectations:

- Staff must not upload, generate, process, or publish identifiable images of pupils using any AI tool or publicly accessible digital platform
- This applies regardless of whether the tool is approved
- This includes AI-generated or AI-enhanced imagery derived from real pupils

Only non-identifiable or fully synthetic imagery (not based on real pupils) may be used.

If you would like an AI tool to be considered for approved use, please contact Lee Pender (lpender@nestschools.org).

AI TOOL NAME	TOOL CLASSIFICATION	SUBSCRIPTION/LICENSING	APPROVED USER GROUPS	PERMITTED USE CASES (DFE-aligned)	DATA HANDLING AND PRIVACY	USER GUIDANCE (INCLUDING SAFEGUARDING REQUIREMENTS)
Key GPT	Enterprise / Closed	Trust-wide Subscription	Staff only	• Administrative & management; • Content creation & delivery; • Drafting, summarising and supporting professional writing	Key GPT does not use data for model training or improvement. It uses restricted API versions to prevent data retention by third-party providers. A Data Processing Agreement (DPA) is in place.	Log in through trust account using school log-in
Microsoft Copilot	Enterprise / Closed	Included in Microsoft 365 licensing	Staff only	• Administrative & management; • Content creation & delivery	Microsoft Copilot does not use enterprise user data for model training. It runs within Microsoft 365's secure cloud environment, meaning data stays within our organisation's control. A Data Processing Agreement (DPA) is in place under the Microsoft 365 license.	Log in through trust account using school log-in.

AI TOOL NAME	TOOL CLASSIFICATION	SUBSCRIPTION/LICENSING	APPROVED USER GROUPS	PERMITTED USE CASES (DFE-aligned)	DATA HANDLING AND PRIVACY	USER GUIDANCE (INCLUDING SAFEGUARDING REQUIREMENTS)
Oak Academy AI-powered lesson assistant (Aila)	Education specific / Closed	Free for schools	Staff only	• Content creation & delivery; • Curriculum-aligned lesson planning support	Aila does not use personally identifiable information and is designed with strict safety guardrails. It prioritizes content from Oak's curriculum and uses Retrieval-Augmented Generation (RAG) to reduce bias and hallucinations. Data is not used for model training, and Oak complies with the Department for Education's safety expectations for educational AI tools.	Log in through trust account using school log-in
Canva and Canva Education	Productivity SaaS / Closed	Subscription (Pro)	Staff only	• Content creation & delivery; • Administrative & management	US-hosted with SCCs/UK Addendum and DPF; no sensitive or pupil data permitted in staff-only use; DPA available. Free Canva Education licence available for school staff.	Create a free educational account linked to your school email address. Do not upload or use pupil photos or identifiable student imagery. Public-facing content must not include identifiable pupils.
Robin	Education-focused / Closed	Trust-wide subscription	Staff only	• Content creation & delivery; • Administrative & management; • Research & writing aid	Staff-only; Limited internal model improvement using aggregated, anonymised staff inputs; no pupil data.; DPA available	Log in through trust account using school log-in
Teach Mate AI	Education-specific / Closed	Subscription	Staff only	• Content creation & delivery; • Administrative & management	UK-only hosting; no training on user data; auto-delete 28 days	Create an account using your school email address. Do not include pupil names or identifying details in prompts.