

MOSAIC SCHOOLS LEARNING TRUST



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RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE POLICY

All schools in Mosaic Schools Learning Trust are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

Staff Responsible: Exec HT/Headteacher/Central Staff

Approved by: Trust Board

Date of Review: February 2026

Date of Next Review: February 2027

VERSION CONTROL

Date	Change
December 2024	New Policy for Mosaic Schools
February 2026	Amendments to transition from school-level policy to a Trust-wide policy

Contents

1. Introduction and Aims	4
2. Scope.....	4
3. Legal and Regulatory Framework	4
4. Key definitions	5
5. Roles and Responsibilities.....	5
6. Appropriate uses (workload reduction with professional oversight).....	5
7. Use of A.I. by pupils.....	7
8. The Ethical Use of A.I.	7
9. Data Protection Implications of Using A.I.	7
10. Cyber security	8
11. Monitoring and Evaluation	8
12. Training and AI Literacy.....	8
13. Links with other policies and practices	8
References.....	9
Appendix A: Approved AI Tools Register as at February 2026	10
Appendix B: AI Attribution & Referencing	12
Appendix C: DPIA screening questions (summary).....	12

1. Introduction and Aims

- 1.1. Mosaic Schools Learning Trust and our schools will use Artificial Intelligence (AI) (including generative AI) to enhance teaching, learning and operations while safeguarding pupils, staff and the wider community.
- 1.2. AI is an integral part of the modern world and offers numerous opportunities for enhancing teaching, learning, and administrative processes. This policy establishes guidelines for the responsible and effective use of AI within our Trust and its schools whilst safeguarding pupils, protecting personal data and upholding academic integrity.
- 1.3. By embracing AI technology responsibly, we aim to:
 - Enhance academic outcomes and educational experiences for pupils
 - Support teachers in managing their workload more efficiently and effectively
 - Educate staff and pupils about safe, responsible and ethical AI use
 - Incorporate AI as a teaching and learning tool to develop staff and pupils' AI literacy and skills
 - Prepare staff 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
 - Improve and streamline school operations to minimise cost and maximise efficiency.

2. Scope

- 2.1. This policy applies to all staff, including temporary staff, consultants, trustees, governors, volunteers, and contractors who may use AI in their professional roles. The policy also covers all forms of AI technology that support learning, teaching, assessment, pupil wellbeing and administration.
- 2.2. Users should adhere to this policy whenever they engage with AI tools provided or approved by the Trust and its schools.

3. Legal and Regulatory Framework

- 3.1 Our AI use is governed by:
 - UK GDPR and Data Protection Act 2018,
 - Keeping Children Safe in Education
 - DfE Filtering and Monitoring Standards for Schools and Colleges
 - DfE policy on Generative AI,
 - DfE Data protection in schools: Generative AI, the UK's AI regulatory principles (DSIT – Department for Science, Innovation & Technology), ICO's Guidance on AI and data protection.

4. Key definitions

- **Artificial Intelligence:** refers to technologies that can make computers learn and have human-like intelligence. A machine can be programmed to perform human-like tasks, based on the information it takes from its surroundings and from previous experience. AI is able to process language, learn and problem-solve.
- **Generative AI:** AI that creates new content (text, images, audio, code, video) in response to prompts by learning patterns from past datasets (Large Language Models (LLMs))
- **Open generative AI tools:** Public tools that may store/learn from inputs.
- **Closed generative AI tools:** Tools provided in a controlled environment where inputs are not used to train public models
- **Bias:** Some information on the Internet is influenced by the opinion of the creator (or existing datasets) and is therefore biased.
- **Copyright:** A law that prevents people from copying the creative work of others without their permission.
- **Deepfake:** a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they have not done.
- **Stakeholders:** People who are involved in the setting, such as staff, students, parents, governors and external partners.

5. Roles and Responsibilities

- **Trust Board/Governing Bodies:** Hold the Headteacher/CEO to account for implementation, risk management and annual review; ensure alignment with DfE and other relevant guidance.
- **Headteacher/CEO:** Day-to-day leadership of AI use; approves tools/uses; ensures training; liaises with DPO and DSL; signs off DPIAs.
- **Designated AI Lead (Trust and School):** The Trust owns the **AI register** (tools, purposes, DPIA status), coordinates assurance, bias checks and quality reviews.
- **Data Protection Officer (DPO):** Advises on compliance, screens projects for **DPIA**, records processing, and manages DP incidents.
- **Designated Safeguarding Lead (School) DSL:** Monitors AI-related safeguarding risks (e.g., harmful content, deepfakes/grooming risks), updates staff training and filtering/monitoring.
- **IT/Network/Security Lead (Managed Services Provider/Trust):** Evaluates tool security; implements access controls, logging and incident response aligned to NCSC guidance.
- **All staff & governors:** Use only approved tools; do not input personal/sensitive data into open tools; **fact-check and sense-check** outputs; **label** AI assistance; report concerns.
- **Pupils:** Follow section 7; attribute AI where appropriate; avoid misuse; report concerns.
- **Suppliers:** Must meet the Trust's data protection /security requirements, confirm whether input data is used to train models, and sign appropriate terms.

6. Appropriate uses (workload reduction with professional oversight)

- 6.1. Staff are permitted to explore and utilise AI-based tools and technologies to assist in managing their work. Examples of such tasks may include marking and feedback, report writing, lesson planning, professional development, administration and facilities management. AI can provide valuable support while still incorporating professional judgment and expertise.

- 6.2. AI tools will be used responsibly, ensuring they complement staff professional judgment and expertise, without replacing them.
- 6.3. Staff remain professionally responsible and accountable for the quality and content of any output generated by AI, however generated or used.
- 6.4. Staff will receive appropriate training and support to effectively integrate AI into their work including professional development opportunities focused on AI tools and their effective integration into school administrative and teaching practices. Training and support will be planned as part of staff personal development reviews and appraisals or on an as-needed basis. Staff have a responsibility to identify any training and development needs they have to ensure they adhere to this policy and should discuss these with their line manager.
- 6.5. AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, AI-based platforms can suggest specific topics or learning activities. Teaching staff are permitted to use these suggestions as a starting point, incorporating their professional expertise to customise the lesson plans and make necessary adjustments to ensure pupil learning objectives are met.
- 6.6. AI tools can be utilised to automate certain aspects of marking of pupil work, such as multiple-choice or filling-the-blank assessments. Teaching staff can use AI-powered marking software to speed up scoring fact-based responses to objective questions, providing more time to support pupils individually.
- 6.7. Teaching staff can also use AI to identify areas for improvement in more subjective written answers. Teaching staff will review and verify AI-generated marks or feedback to ensure accuracy, and add their professional judgment, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.
- 6.8. Teaching staff can use AI to assist in writing pupil reports, ensuring accuracy and efficiency while maintaining their professional judgment. Where AI has been used to support with report writing, the staff member will always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.
- 6.9. Staff can use AI as a starting point to gather relevant information and identify patterns in pupil attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each pupil's progress. By using AI responsibly in pupil progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on pupils' academic achievements and overall development.
- 6.10. Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. For example, labeling any work that has been wholly or partially created by AI or "AI supported". Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws
- 6.11. Staff should be aware that of the risks and challenges of using content produced by generative AI and be mindful that the information could be:

- inaccurate
- inappropriate or unsafe
- biased
- taken out of context
- taken without permission (intellectual property infringement)
- out of date or unreliable
- low quality

6.12. Users of AI should be aware of the reported environmental impact of using AI and therefore use responsibly.

6.13. Decisions taken should not be driven by AI alone and must have human oversight, e.g. pupil moves to a different group etc. Automated decisions may have further data protection consequences, e.g. under DPA 2018.

7. Use of A.I. by pupils

7.1. We are aware of the need to educate our pupils and prepare them for the workplace, where AI will potentially play a key role. This policy provides guidelines for the responsible and ethical use of AI within our school. Although pupils under the age of 13 will not directly use AI, this policy ensures that AI is used effectively and safely by staff to enhance teaching, learning, and administrative functions, as well as teaching pupils how to use AI responsibly prior to them moving onto the secondary phase of their education.

8. The Ethical Use of A.I.

8.1. The use of AI systems, in particular Generative AI, will be carried out with caution and an awareness of their limitations.

8.2. AI tools used must be fair, transparent, and free from bias.

8.3. Staff should critically evaluate AI outputs for accuracy and fairness.

8.4. AI will not be used to process personal or special category of personal data, and all data entered into AI systems must be handled in compliance with the Trust's Data Protection Policy.

8.5. All AI tools must have human oversight, ensuring that decisions or outputs generated by AI are reviewed by staff to maintain the integrity and ethical standards of the school and Trust.

8.6. Work solely or partially produced using AI will be referenced as such.

8.7. Original pupil work or copyrighted content will not be uploaded without consent or a lawful basis; pupils' work **must not** be used to train public models.

8.8. AI will not be used to generate harmful, explicit, discriminatory, deceptive or impersonating content (including deepfakes).

8.9. AI will not be relied upon for solely automated decisions with legal or similarly significant effects on individuals.

9. Data Protection Implications of Using A.I.

9.1. Staff and pupils should be aware that any information entered into a Generative AI model is no longer private or secure. Staff and pupils must NOT enter any personal data (pupils, parents, staff, governor), special category data, confidential or commercially sensitive information into any Generative AI model. Staff should make themselves aware of and inform

parents and pupils about the usage practices associated with AI technologies, particularly Generative AI.

- 9.2. Staff who wish to utilise AI tools must ensure that the potential new use is assessed to consider if a Data Protection Impact Assessment (DPIA) is required and follow the Trust's Data Protection Policy. When signing up to use certain Generative AI models, names and email addresses may be required; this data sharing may require a DPIA to be carried out, when advice should be sought from the Trust's Data Protection Officer (email: dpo@mslt.org.uk).

10. Cyber security

The Trust and our schools will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Implementing rigorous cybersecurity protocols and access controls through measures such as MFA, encryption, security patches and updates, access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to Data Protection Officer and the Trust's ICT Managed Service Provider.
- Carrying out an evaluation of the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This work will form part of the DPIA process.
- Maintaining vigilance against material that may be a deepfake. These can be used to spread misinformation or impersonate someone to commit cyber fraud.
- Regular training of staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

11. Monitoring and Evaluation

The AI policy will be reviewed annually or as needed to adapt to changes in technology and regulatory guidance. Feedback from staff and other stakeholders will be considered in the ongoing evaluation and development of AI practices within the school. Regular audits will be conducted to ensure that AI use within the school complies with this policy and relevant legal frameworks. The Trust will maintain an AI register which tracks how AI tools are used, by whom and for what purpose and any risks associated with them.

12. Training and AI Literacy

The Trust and our schools provide ongoing training covering safe, effective and ethical AI use, data protection, safeguarding risks, bias, accessibility and pedagogy. DfE training resources and LGfL's AI Literacy Framework together with other resources will inform staff CPD and pupil learning.

13. Links with other policies and practices

This policy links with a number of other policies, practices and action plans including:

- Behaviour Policy
- Child protection and Safeguarding Policy

- Confidentiality Policy
- ICT Acceptable Use Policy (AUP)
- Data Protection

References

- DfE, *Generative AI in education* (updated 12 Aug 2025)
- DfE, *Data protection in schools: Generative AI* (updated 6 Oct 2025).
- DSIT, *Implementing the UK's AI regulatory principles* (Feb 2024) and AI Regulation White Paper
- ICO, *Guidance on AI and data protection* (ongoing)
- NCSC, *AI and cyber security: what you need to know*
- LGfL, *Policies: Evaluating AI Tools / AI Literacy Framework and Safeguarding-first approach to AI*.
- Source models used: NGA AI policy model; The Key Model Policy (June 2025)

Appendix A: Approved AI Tools Register as at February 2026.

Please contact Central Team for further information

Tool / Version	Approved for (roles)	Permitted uses	Conditions / Notes (e.g., closed model, data use)
M365 Copilot	All Staff	<p>Drafting and refining professional documents (e.g., letters to parents, policies, reports, meeting notes) using organisational data only.</p> <p>Summarising meeting transcripts, emails, and documents stored in the trust/school environment to support efficiency and accuracy.</p> <p>Creating lesson outlines, schemes of work frameworks, and assessment rubrics that staff then review and adapt.</p> <p>Generating data-informed summaries from files the user has permission to access.</p> <p>Producing non-student-identifying templates and checklists (e.g., risk assessments, onboarding checklists).</p> <p>Drafting guidance for administrative workflows, process documentation, and staff communications.</p> <p>Generating PowerPoint drafts and Word/Excel skeletons for staff use, with human review prior to distribution.</p>	Open AI - Use in line with data protection policies. Do not paste personal special category data or safeguarding details into prompts
Teach Mate	Teachers and School Leaders	<p>Drafting lesson starters, plenaries, retrieval practice questions, and homework prompts aligned to curriculum intent.</p> <p>Suggesting differentiation strategies and scaffolds for</p>	Closed Platform. No entry of personally identifiable information about pupils, parents, or staff; do not upload or describe safeguarding cases or

		<p>mixed-ability classes that staff review for appropriateness.</p> <p>Creating exemplar marking criteria, feedback statements, and banked comments (non-student-specific).</p> <p>Generating non-identifiable classroom resources (e.g., quiz questions, glossaries, practice tasks) for teacher review.</p> <p>Producing ideas for inclusive pedagogy, SEN support strategies, and EAL scaffolds at a general level (no personal data).</p> <p>Drafting CPD session outlines and teaching & learning guidance for internal development.</p>	<p>sensitive assessments.</p>
The Key GPT	School Leaders	<p>Locating and summarising relevant statutory guidance, model policies, and best-practice advice for schools/trusts.</p> <p>Drafting policy updates and implementation checklists aligned to current DfE guidance (for human validation).</p> <p>Producing governance support materials (e.g., governor briefing summaries, agenda prompts, monitoring questions).</p> <p>Creating templates for procedures (e.g., complaints handling stages, recruitment checklists) for leadership review. Summarising public regulatory content to aid compliance planning and staff briefing materials.</p> <p>Generating Q&A or briefing notes for SLT/Local Governing Boards based on publicly available guidance.</p>	<p>Closed platform based on subscription-based service. Use only with non-confidential context; do not input case details, complaints, investigations, HR matters, or pupil-level data. Check output.</p>

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Appendix B: AI Attribution & Referencing

Staff and pupils must clearly indicate when AI tools have assisted their work. Example: 'Generated with [Tool], prompt on [date], reviewed and edited by [name].' For pupils, include a brief reflection on how AI was used and how the output was validated.

Appendix C: DPIA screening questions (summary)

- Will personal data be input, generated or inferred?
- Are children's data involved?
- Is automated decision-making used?
- Are special category data involved?
- Will inputs be used to train models?
- Where is data stored/processed?
- What are the risks and mitigations?
- Can data be deleted/exported?
- What human oversight is in place?