

AI Risk Management Policy

Date reviewed: September 2026

Date of next review: September 2027



Polaris
Multi-Academy Trust

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A. Definitions - Glossary

Artificial Intelligence (AI): A broad term describing computer systems that perform tasks normally requiring human intelligence.

Generative Artificial Intelligence (Generative AI / GenAI): AI models capable of producing new content such as text, images, audio, or code.

Machine Learning (ML): A subset of AI where systems learn from data to improve performance without explicit programming.

AI System / AI Tool: Any software or platform that uses AI or ML to automate or support tasks.

Management Information System (MIS): A secure Trust-controlled system for storing and processing data.

Personal Data: Information relating to an identifiable individual.

Sensitive Data / Special Category Data: Highly personal information requiring enhanced protection.

Data Protection Impact Assessment (DPIA): An assessment required under UK GDPR to evaluate risks when personal data is processed.

Hallucination (AI Hallucination): An incorrect, fabricated or misleading output produced by an AI model.

Bias (AI Bias): Distortion in AI outputs due to limitations in data or model design.

1. Introduction

Artificial Intelligence (AI) is a rapidly evolving technology that has significant potential for both positive and negative impact in education and wider society. Generative Artificial Intelligence (GenAI) is a relatively new form of AI that is experiencing rapid growth in its use by the general population and commercial enterprises.

This rapid evolution of AI means policies and guidance will need to continue to be developed, refined and updated to reflect emerging functionality and trends. This is highly challenging, and users of AI (including multi academy trusts and schools) need to be prepared to reflect carefully on how they use AI in line with the principles set out here in such new contexts.

In education, AI presents opportunities to reduce workload for the trust workforce, to enhance personalised learning, support professional development, and more. It also increases the chance that pupils will overly use AI, particularly Generative AI, to complete their schoolwork

and assessments, and more. There are also important safeguarding risks and controls schools and trusts need to be mindful of.

This Artificial Intelligence (AI) Policy should be read and considered alongside other trust and school policies and guidance, including:

- Trust Digital Strategy
- Code of Conduct.
- Data Protection Policy.
- Cyber Security Policy and Procedures.
- Disciplinary Policy & Procedure.
- E-Safety Policy.
- ICT Acceptable Use Policy.
- Safeguarding Policy.
- Other policies introduced relevant to AI.

National policy and guidance should also be read alongside this policy, including:

- Department for Education (DfE) Generative Artificial Intelligence Guidance.
- Joint Council for Qualification (JCQ) AI Use in Assessments: Protecting the Integrity of Assessments
- Information Commissioner's Office (ICO) Guidance on AI and Data Protection.
- Keeping Children Safe in Education.
- Ofsted's Approach to Artificial Intelligence.
- Other guidance and policies introduced relevant to AI.

2. Scope.

This policy applies to all staff, pupils, and stakeholders within the Trust who engage with AI technologies in any capacity.

3. Principles.

Any use of AI must follow the Trust's mission, vision and values, strategic plan and/or the Trust's high expectations and standards as demonstrated in its policies and everyday practice.

Whether directly, or indirectly, the overarching goal of AI is to assist pupils in achieving educational goals and improve their outcomes. This may be through workload reduction for all staff, teacher time saving techniques for example, or through Trust agreed third party software that impacts positively on teaching and learning.

The Trust primarily sees Generative AI models as a tool for staff.

The Trust is committed to the ethical use of Artificial Intelligence (AI) to enhance learning and administrative processes. The Trust and its schools will prioritise transparency, fairness, and accountability in all AI applications. AI tools will be used to support educational goals while respecting the privacy and rights of all pupils and staff. We will ensure that AI systems are designed and implemented to avoid bias, promote inclusivity, and uphold the highest standards of honesty and responsibility.

AI must never replace human judgment, instead it should enhance knowledge and decision making. Equally, the loss of human interaction is a risk that should be mitigated in an

organisation, profession and sector that is built on building and sustaining positive human relationships.

The Trust encourages the careful and considerate use of Artificial Intelligence (AI) but advises using Generative AI cautiously. Users must adhere to this guidance and policy, other related school and trust policies, and that provided in national guidance and policies. Users must be familiar with and adhere to all related policies applicable to the use of AI.

Generative AI may present plausible information that is: inaccurate; inappropriate; biased; reinforces stereotypes; taken out of context and without permission; misinformation; and out of date; and unreliable. Hallucinations occur when AI detects patterns or objects that don't exist, leading to outputs that are incorrect or meaningless. Users should only use information if they are qualified to verify its accuracy. Users must quality assure the output before deciding to use it.

When directed, staff must access AI-related training provided by the Trust, school, and/or other relevant providers based on the trust principles.

Staff and pupils should have sufficient knowledge and guidance to ensure that they can recognise where AI is useful, and when AI is counterproductive. If they are in doubt, then they should not use it.

4. Data Protection and GDPR.

Data protection is everyone's responsibility. Under no circumstances should personal or identifying information about staff, pupils or other individuals be entered into any AI system without prior agreement from the Data Protection Officer (DPO). In these circumstances, a Data Protection Impact Assessment (DPIA) will be carried out to ensure that appropriate levels of data and cyber security are present to protect personal information.

Under no circumstances should sensitive or personal information or data, in any format or media, be uploaded to or shared with premium paid-for or free-to-use Generative AI models that do not have commercial data protection outside of Trust's closed infrastructure, and where it is not stored in data centres compliant under GDPR.

If personal or sensitive data is to be used with Generative Artificial Intelligence, this must take place within one of the MIS platforms led by the trust. If in doubt, staff should consult with the Trust Data and Information Manager for guidance.

Incidents of inappropriate use of Generative Artificial Intelligence, including the use of personal and/or sensitive data, will be dealt with in line with relevant school and Trust Data Protection policies/procedures and, if necessary, associated Human Resources policies and procedures including the Disciplinary Policy & Procedure.

Staff must not allow or cause intellectual property, including pupils' work, to be used to train Generative AI models, without appropriate consent or exemption to copyright. Pupils' work should not be used to train Generative AI without written parental consent (if the pupil is aged under 18) or written consent from the student (if aged 18 or over).

4.1 Staff, pupils and related stakeholders administering or undertaking assessments

Staff, pupils and related stakeholders administering or undertaking assessments, should be informed about JCQ regulations and requirements at an appropriate time.

4.2 Pupils use of AI

To prepare pupils to contribute to society and the future workplace, students should be educated about appropriate use, benefits, risks, and mitigations associated with AI, including Generative Artificial Intelligence. Pupils must understand the consequences of the misuse of AI or unethical behaviour. Pupils do not necessarily need direct access to AI for these purposes.

User age restrictions vary between models and must be adhered to. Most are age 18+, some 16+ or 13+.

Written parental consent is required for pupils aged over the minimum age restriction for the Generative AI model, but under 18 years of age to use Generative AI tools in schools. The independent use of Generative AI models by pupils using school equipment and/or on the school site is not allowed. AI experiences for pupils must be staff led. The Trust primarily sees Generative AI models as a tool for staff.

4.3 Misuse of AI

Misuse of AI is defined as any action or use of AI that does not comply with school and/or Trust policies, including this policy, or the use of AI for any unethical or immoral purpose. The Trust and its schools will ensure that staff and pupils understand the consequences of misuse of AI and/or unethical behaviour through the communication of this policy.

4.4 Reporting the misuse of AI

Staff should report any misuse of AI to their line manager. Pupils should report misuse to their teacher. If an external individual wishes to raise a complaint about the use of AI, this would need to be raised in line with the school's Complaints Policy.

5. Parents.

To inform parents of the use of AI in schools. The following statement will be shared with parents the Trust school's websites.

We are using technology called Artificial Intelligence (AI) to help us. This includes Generative AI tools like Microsoft 365 Copilot Chat and Machine Learning educational resources. Our teachers and staff are learning how to use these tools to make learning even better for your child(ren) or to reduce their workload so they can focus more on what happens in the classroom to enhance your child(ren)'s learning.

Your child(ren) may use AI-enabled learning resources in school. Our staff know not to share your child's important work with AI tools or providers that don't protect their data. Where the provider requires it, we will undertake a data protection risk assessment, and we will typically ask for your consent before using such tools.

Generative AI models have age limits, usually 13+, 16+ or 18+. If your child is old enough to use these tools but are under 18, we will need your permission before they use them in school or as part of their learning. At this moment, we do not plan to provide children with AI models like Microsoft 365 Copilot Chat. We will make you aware if this changes. We are also working towards teaching students about AI to help them for the future in line with the government's curriculum plans.

When our staff use Generative AI, they do not share personal information like names or birthdays with models that do not have enterprise data protection within our Microsoft 365 environment. They may use AI to help them to undertake their role, including creating lesson plans, classroom resources and reports. If we use any personal data with other AI resources, it is done safely with tools with data protection features and staff follow all our data protection and related policies.

6. Governance.

The Trust Directors (Trustees) will review this policy annually.

7. Monitoring, auditing, and ongoing compliance.

The use of AI will be monitored via the Trust's existing systems, including:

- Ongoing daily compliance checks and school reporting, in line with those conducted via the Trust's Firewall.
- Logs or registers of AI systems in use; annual audits of AI use of Microsoft Co-Pilot and CHATGPT log analysis.
- Formal feedback received bi-annually from Heads of School via the Trust Operations meetings.
- The monitoring of reports from other systems contained in connected policies (Acceptable Use of ICT Policy and Safeguarding Policy).

The above will feed into the formal annual review of this policy and the Trust's compliance with the wider DFE Digital Standards.

AI will be added to the Trust's Risk Register at an agreed time with the Audit, Risk and Finance Committee when feedback reports and/or the development of AI requires it.

Appendix A – National Guidance

5. National guidance.

A brief summary of and/or link to some of the key considerations are provided below. Users must consider the full guidance.

5.1 KCSIE states:

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. These include, but are not limited to:

- *Deepfake risk*
- *Bullying / harassment via AI*
- *AI-generated nudity / inappropriate content scenarios*
- *Prevent / extremism content risks*
- *Misinformation risks related to pupil wellbeing*

All trust staff will receive updated guidance and training in this area via its on-line training platform and through further school training provided by the school's DSLs.

5.2 DfE (Department for Education) states:

[Schools and colleges should] ensure that children and young people are not accessing or creating harmful or inappropriate content online, including through Generative AI - keeping children safe in education provides schools and colleges with information on:

- *what they need to do to protect students and students online*
- *how they can limit children's exposure to risks from the school's or college's IT system*

Department for Education (DfE) Generative AI in Education

DfE guidance is available here:

<https://www.gov.uk/government/publications/generative-artificial-intelligence-ineducation/generative-artificial-intelligence-ai-in-education>

5.3 Ofsted's approach to artificial intelligence (AI).

Ofsted states:

Ofsted will not directly inspect the quality of AI tools. It is through their application that they affect areas of provision and outcomes such as safeguarding and the quality of education. Leaders, therefore, are responsible for ensuring that the use of AI does not have a detrimental effect on those outcomes, the quality of their provision or decisions they take.

Ofsted supports the use of AI by providers where it improves the care and education of children and learners. We recognise that these tools can help providers make better informed decisions, reduce workload and lead to innovative ways of working.

4.4 Joint Council for Qualification (JCQ) AI Use in Assessments: Protecting the Integrity of Assessments.

[AI Use in Assessments: Your role in protecting the integrity of qualifications – Joint Council for Qualifications](#)

4.5 Information Commissioner's Office (ICO) Guidance on AI and Data Protection.
[Guidance on AI and data protection | ICO](#)