



BDMAT
Birmingham Diocesan
Multi-Academy Trust

Artificial Intelligence (AI) Usage Policy

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1. Policy Statement and Ethos

BDMAT recognises the transformative potential of Artificial Intelligence (AI) in strengthening educational provision, improving operational efficiency, and supporting staff across all academies within the Trust. This policy defines how AI will be adopted, monitored, and governed to ensure ethical, safe, and effective use throughout the Trust.

The Trust's Christian ethos underpins this policy: a belief in **human potential, hopeful innovation**, and **love expressed through responsible stewardship** of emerging technologies. AI should enhance teaching, reduce workload, and support improved outcomes across all academies, while safeguarding fairness, accuracy, and truth.

2. Purpose, Scope, and Legislative Framework

Purpose

This policy ensures that all AI use across the Trust supports teaching, learning, leadership, and administration ethically and safely, while maintaining compliance with legal and regulatory requirements.

Scope

This policy applies to:

- All Trust employees
- Academy leadership teams
- Trustees and local academy boards
- Students and parents/carers
- Contractors and external providers using Trust systems
- All academies and shared Trust services

It applies to all AI tools used for:

- Teaching and learning
- Assessment
- Administrative, business, and HR functions
- Data analysis and reporting
- Communication and governance

Legislative Alignment

- UK GDPR & Data Protection Act 2018
- Department for Education (DfE) AI in Education Framework (2023)
- JCQ Regulations on AI-Assisted Work (2024)
- ICO Age-Appropriate Design Code
- Ofsted EIF
- UNESCO Ethical AI in Education Framework

3. Definitions

To support staff understanding, key terms are defined as follows:

- **Artificial Intelligence (AI):** Technology that enables computers to perform tasks requiring human-like intelligence.
- **Machine Learning (ML):** Algorithms that learn from data and improve over time.
- **Generative AI:** Systems that create new content, such as ChatGPT or Microsoft Copilot.
- **Adaptive Learning Systems:** Platforms that personalise learning based on student performance.
- **Predictive Analytics:** Use of data to predict trends, such as attendance or behaviour patterns.
- **Large Language Models (LLMs):** AI trained on large text datasets to generate natural language responses.

4. Guiding Principles

Across all academies and shared services, AI use must reflect:

- **Human Oversight** – AI will never replace professional judgement.
- **Transparency** – All AI-assisted processes must be understood and explainable.
- **Fairness and Inclusion** – AI must promote equity across the Trust.
- **Accountability** – Users remain responsible for outputs and decisions.
- **Stewardship** – The Trust will adopt AI ethically and responsibly.
- **Safety and Privacy** – Strict adherence to UK GDPR and safeguarding policies.
- **Continuous Improvement** – AI practice will be monitored and reviewed Trust-wide.

4A. Trust-Approved AI Platform

BDMAT operates a central Microsoft 365 tenancy. **Microsoft Copilot is the Trust-approved AI platform** for staff and must be used in preference to publicly available AI tools.

- Copilot operates within the secure Trust environment.
- Prompts and outputs remain inside the Trust tenant.
- AI must always support—not replace—professional judgement.
- Where AI informs decisions about pupils, families, or staff, explanations must be transparent and documented.
- Individual schools must **not adopt alternative AI tools** without formal Trust approval.

4B. Open vs Closed AI Systems

- AI tools fall into two categories with differing levels of risk:
- **Closed AI Systems (Preferred)**
- Closed systems operate within the Trust's secure infrastructure and do **not** use Trust data to train public models.

Examples include:

- Microsoft Copilot (within the Trust Microsoft 365 tenant)
- Any Trust-approved education platform with a defined data-processing agreement
- These systems must be used for all professional activity wherever AI is required.

Open AI Systems (Higher Risk)

- Open, publicly available AI systems (e.g., ChatGPT, Google Gemini) may store, reuse, or learn from user inputs.

Because of this, users must not:

- Enter any personal, sensitive, school-identifiable, or copyrighted data
- Use open systems for lesson planning, assessment, or document creation unless specifically authorised by the Trust
- Use personal accounts to access AI tools for Trust work
- Open AI tools may only be used where a DPIA has been completed and Trust-level approval granted.

5. Roles and Responsibilities

Trust Board

- Oversees digital strategy and risk management.

IT Lead (AI Lead)

- Leads AI integration, risk assessment, staff training, and governance across all academies.

Data Protection Officer (DPO)

- Reviews data implications, conducts Trust-level DPIAs, ensures UK GDPR compliance.

Academy Senior Leadership Teams (SLTs)

- Implement AI policy at school level, ensuring staff compliance and local monitoring.

Teachers and Support Staff

- Model responsible AI use and verify AI outputs.

Secondary Students

- Engage with AI safely and ethically under supervision.

Primary Students

- Not recommended to use unless separate approval

Parents/Carers

- Support responsible use outside school hours.

6. Acceptable and Unacceptable Use

Acceptable Use for Staff

- Using Microsoft Copilot or other Trust-approved platforms for planning, differentiation, resource creation, translation, SEND support, administrative drafting, and data analysis using anonymised sets.
- Reviewing, editing, and verifying all AI-generated outputs for accuracy, tone, and appropriateness.

Acceptable Use for Students

- Using AI for revision, checking grammar, research, coding, or creative exploration—while ensuring final work reflects the student's own understanding.
- Using only AI tools approved by the Trust.

Unacceptable Use

- Using AI to complete assessments or submit AI-generated work as original.
- Entering personal, safeguarding, SEN, medical, HR, or any sensitive data into AI systems.
- Using AI to generate harmful, misleading, or inappropriate content.
- Using unapproved AI tools or attempting to bypass Trust security.

Absolute Prohibitions apply across all academies and Trust central teams.

Intellectual Property and Copyright Compliance

All staff must ensure that AI tools are used in ways that respect copyright and intellectual property laws.

- AI outputs may contain material derived from copyrighted sources. Staff must review and verify all AI-generated content before use.
- Copyrighted material must **not** be entered into AI tools unless the Trust has explicit permission or a legal exception applies.
- Staff remain responsible for ensuring that any published or shared materials do not infringe the rights of third-party creators.

Failure to follow IP requirements may constitute a breach of Trust policy and relevant legislation.

7. AI in Teaching, Learning, and Assessment

Trust-wide expectations remain aligned with JCQ policies, including:

- AI not permitted in exams.
- Strict rules for NEAs and controlled assessments.
- Requirement for declaration and teacher authentication.

8. Safeguarding, Data Protection, and Privacy

- Applies to all academies, central staff, and shared systems.
- No AI tool may be used to process sensitive or identifiable data.
- High-risk tools require DPO approval.

9. AI Tool Approval and Implementation

Approval process is now **Trust-wide**:

1. Academy or central staff member submits an AI Tool Evaluation Form.
2. IT Lead reviews and conducts DPIA.
3. **Vendor Transparency Requirements** - Before any AI tool is approved, the Trust must obtain written confirmation from the vendor regarding:
 - Whether the tool uses any data entered to train or improve the AI model.
 - Whether the vendor acts as a **data controller** or **data processor** for any personal data processed.
 - How the vendor ensures compliance with UK GDPR, including data minimisation, deletion, and transparency obligations.
4. Any AI tool that uses Trust data for training, or whose data-processing role cannot be clearly defined, must not be approved.
5. DPO approves (or declines).
6. ELT grants authorisation.
7. Pilot conducted in selected academies.
8. Final approval and entry into the Trust's AI Tool Register.

10. Training and Professional Development

Training delivered trust-wide:

Annual mandatory AI training

- Induction for new staff
- Trust CPD programmes
- Communities of practice across academies
- Workload impact monitor at MAT level

11. Monitoring and Evaluation

- Trust Board receives annual report summarising incidents, risks, and impact.

12. Breaches and Misuse

- Consequences apply to all academies and Trust central teams, following **Trust disciplinary procedures**.

13. Related Policies

- Rewritten to reflect **Trust-level ownership** of all policies (Data Protection, Online Safety, Assessment, Exams, and Safeguarding).