



Artificial Intelligence Policy

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Document Control

Review Frequency	Annual
Review Date	September 2027
Ratified By	CAST Senior Executive Leadership Team
Date of Ratification	14/09/2026
Lead/Owner	Chief Operating Officer & Director of Education
Target Audience	CAST Directors CAST Local Governors Senior Leadership Teams at Trust and School Level Plymouth CAST Joint Consultation & Negotiating Committee All staff (Teaching & Non-Teaching) Pupils & Students Parents & Carers Auditors
Document Version	1.1

The electronic version is the definitive version of this document.

The content of this procedure may be subject to revision from time to time in line with the policy review schedule or when legislation changes or operational reasons arise. Consultation with the recognised trade unions will be completed before any changes are made.

Version Changes

Version	Section Number	Details of Change	Agreed By	Date
1.0		New Policy	SELT	03/11/2025

Version	Section Number	Details of Change	Agreed By	Date
1.1	4	Safeguarding & Online Safety Risks - adopted KCSIE 2026's updated "4Cs" framework. Added explicit prohibitions against generating/sharing deepfakes, digitally altered content, nudes and semi-nudes, and unmonitored interaction with conversational AI chatbots.	SELT	14/09/2026
1.1	5	Technical & Product Safety Compliance - formally incorporated DfE <i>Generative AI Product Safety Expectations</i> and DfE <i>Cyber Security Standards for Schools and Colleges</i> into the tool review and approval workflow.	SELT	14/09/2026
1.1	6	Annual Filtering & Monitoring Checks - mandated a formal, documented annual review of filtering and monitoring effectiveness (including AI chatbots and embedded models) across all school devices. Assigned explicit accountability to SLT, DSL, and IT leads.	SELT	14/09/2026
1.1	7	Annual Filtering & Monitoring Checks - mandated a formal, documented annual review of filtering and monitoring effectiveness (including AI chatbots and embedded models) across all school devices. Assigned explicit accountability to SLT, DSL, and IT leads.	SELT	14/09/2026
1.1	7	Whole-Staff Training Duties - extended annual online safety and AI risk training (covering deepfakes, synthetic media, and filtering escalation) to all staff , including non-teaching and support staff, aligned with KCSIE Part 1 expectations.	SELT	14/09/2026
1.1	8B	Safeguarding & Online Safety Risks - adopted KCSIE 2026's updated "4Cs" framework. Added explicit prohibitions against generating/sharing deepfakes, digitally altered content, nudes and semi-nudes, and unmonitored interaction with conversational AI chatbots.	SELT	14/09/2026
1.1	8D	Technical & Product Safety Compliance - formally incorporated DfE <i>Generative AI Product Safety Expectations</i> and DfE <i>Cyber Security Standards for</i>	SELT	14/09/2026



Version	Section Number	Details of Change	Agreed By	Date
		<i>Schools and Colleges</i> into the tool review and approval workflow.		
1.1	9	Safeguarding & Online Safety Risks - adopted KCSIE 2026's updated "4Cs" framework. Added explicit prohibitions against generating/sharing deepfakes, digitally altered content, nudes and semi-nudes, and unmonitored interaction with conversational AI chatbots.	SELT	14/09/2026
1.1	10	Academic & Strategic Alignment - updated JCQ assessment compliance and malpractice guidance, cross-referenced filtering/monitoring and mobile device policies, and updated the AI Champion role descriptor to include filtering support.	SELT	14/09/2026
1.1	14	Whole-Staff Training Duties - extended annual online safety and AI risk training (covering deepfakes, synthetic media, and filtering escalation) to all staff , including non-teaching and support staff, aligned with KCSIE Part 1 expectations.	SELT	14/09/2026
1.1	18	Academic & Strategic Alignment - updated JCQ assessment compliance and malpractice guidance, cross-referenced filtering/monitoring and mobile device policies, and updated the AI Champion role descriptor to include filtering support.	SELT	14/09/2026
1.1	Appendix 1	Academic & Strategic Alignment - updated JCQ assessment compliance and malpractice guidance, cross-referenced filtering/monitoring and mobile device policies, and updated the AI Champion role descriptor to include filtering support.	SELT	14/09/2026

1. Vision and Values

- 1.1. Plymouth CAST is a multi-academy trust of Catholic schools which is part of the mission of the Catholic Church dedicated to human flourishing and the building of a kingdom of peace, truth and justice. The Trust is to be conducted in all aspects in



accordance with canon law and the teachings of the Roman Catholic Church and at all times to serve as a witness to the Catholic faith in Our Lord Jesus Christ.

- 1.2. Our vision and values are derived from our identity as a Catholic Trust. Central to our vision is the dignity of the human person, especially the most vulnerable. Our academies are dedicated to providing an education and formation where all our pupils and young people flourish in a safe, nurturing, enriching environment. All governors in our academies are expected to be familiar with the vision, mission, values and principles of the Trust and not in any way to undermine them. They should support and promote the vision and conduct themselves at all times in school and on school business according to the vision and principles of the Trust.
- 1.3. Plymouth CAST expects all its employees to recognise their obligations to each school within the Multi-Academy Trust, the public, pupils and other employees and to provide consistently high standards of education and performance at all times and in accordance with Plymouth CAST's vision, mission and principles.

2. Purpose and Scope

This policy:

- Establishes a governance framework for the use of AI in Plymouth CAST schools
- Defines roles and responsibilities for staff, leaders, governors, and pupils
- Supports staff in using AI to reduce workload and enhance teaching and learning
- Sets out safeguards to protect children and adults, uphold academic integrity, and comply with data protection law

The policy applies to all staff, governors, volunteers, pupils, and contractors using AI tools in the course of their work or learning across the Trust.

3. Objective

The purpose of this policy is to ensure the responsible, safe, ethical and effective use of Artificial Intelligence (AI) across Plymouth CAST.

The policy aims to:

- Enhance teaching and learning through responsible innovation.
- Uphold safeguarding, academic integrity, and privacy.
- Promote human oversight, transparency, and trust.

4. Definitions

- **Artificial Intelligence (AI):** Computer systems that mimic human intelligence, including decision-making, language understanding, and pattern recognition.
- **Generative AI (GenAI):** A type of AI that produces new content (text, images, audio, video, code) in response to prompts.
- **Prompt:** Instructions given to an AI system to generate content.
- **Open AI tools:** Freely available systems (e.g. ChatGPT, Gemini) which may store data and lack built-in safety controls.
- **Closed AI Tools:** Enterprise systems with privacy controls that do not use user data for training.
- **Enterprise Tools:** AI tools explicitly approved for use by the Trust based on safety, legality, and educational value.
- **Ethical Use:** Applying AI in ways that are lawful, fair, transparent, and respectful to all members of the school community. This includes preventing bias or discrimination, safeguarding privacy, ensuring accuracy and reliability, and maintaining appropriate human oversight.

5. Regulatory Context

This policy is informed by:

- UK GDPR and Data Protection Act 2018
- DfE's "Generative AI in Education" guidance
- Information Commissioner's Office (ICO) guidance on AI and Data Protection
- Keeping Children Safe in Education (KCSIE)
- JCQ guidance on AI use in assessments
- Plymouth CAST's vision and Catholic values

Plymouth CAST recognises Ofsted's published approach to Artificial Intelligence (AI) and acknowledges the requirement to demonstrate how AI use is consistent with statutory obligations. This policy therefore ensures AI tools are only used in ways that uphold educational standards, safeguarding, and leadership accountability.

6. Privacy & Monitoring

Use of AI tools on school systems or devices will be filtered and monitored by the Trust to ensure compliance with safeguarding, data protection, and information security standards. In line with KCSIE 2026

requirements, the Trust's Senior Executive Leadership Team, and IT Manager will conduct, document, and maintain records of an annual review and testing of filtering and monitoring systems. This review will specifically evaluate system effectiveness in managing access to standalone generative AI platforms, embedded AI features, and conversational AI chatbots across all internet-connected devices. Monitoring will

remain proportionate, transparent, and consistent with the Trust's privacy notices and obligations under UK GDPR and the Data Protection Act 2018.

7. Roles and Responsibilities

Board of Directors / Local CAST Boards

- Provide strategic oversight and ensure compliance with statutory duties, including KCSIE 2026 filtering and monitoring standards.
- Support Headteachers and AI Leads to implement safe and effective AI practices

Headteachers

- Responsible for day-to-day implementation of this policy.
- Must approve all AI tool use within their school, informed by DPIAs and safeguarding risk assessments.
- Ensure staff and pupils are trained and supported.
- Monitor compliance, oversee the annual filtering system review alongside the DSL and IT leads, and report issues to the LCB and Trust.

AI Champions (School-level)

AI Champions act as designated points of contact within schools to promote the safe, ethical, and effective use of Artificial Intelligence (AI) in teaching, learning, and administration.

They:

- Support colleagues in developing confidence, competence, and discernment when using AI tools in line with Plymouth CAST's vision and Catholic values.
- Promote ethical and inclusive AI practice that upholds safeguarding, data protection, and educational integrity.
- Coordinate with the Trust AI Lead and Headteacher to review, pilot, and evaluate AI tools prior to approval.
- Use the resources available within the Trust's [AI Toolkit](#) to provide guidance on responsible AI use and help ensure compliance with DPIA, intellectual property, and online safety expectations.
- Monitor emerging developments in AI relevant to education and share best practice through professional learning communities or staff meetings.
- Model transparent and responsible AI use within their own professional practice.

Each school will identify at least one AI Champion from the teaching or support staff team, supported by the Headteacher and the Trust AI Lead.

AI Leads (Trust-level)

- Coordinate AI implementation and training.
- Maintain a register of approved AI tools and their permitted uses.
- Monitor compliance and report issues to the Trust Board.
- Use the resources available within the Trust's [AI Toolkit](#) and additional resources and consultancy services to provide guidance, networking opportunities, and professional resources for local AI Champions.

Data Protection Officer (DPO)

- Ensure AI use complies with UK GDPR and data protection laws.
- Review AI tool DPIAs and vendor agreements
- Provide guidance on personal data use in AI systems.

Designated Safeguarding Lead (DSL)

- Monitor safeguarding risks linked to AI use, including exposure to inappropriate content, synthetic media, and conversational AI risks.
- Maintain an operational understanding of how the Trust's filtering and monitoring systems manage AI safety risks in line with KCSIE 2026.
- Support and document the annual filtering and monitoring review alongside IT and leadership teams.
- Update safeguarding training and reporting pathways to ensure AI-generated abuse, deepfakes, and synthetic media are addressed effectively.

All Staff

- Read Part 1 of KCSIE in full (applicable to both teaching and non-teaching/support staff) and understand how to report emerging AI risks.
- Use only Trust-approved AI tools.
- Never input identifiable personal data into unauthorised systems.
- Check AI outputs for factual accuracy, bias, and appropriateness.
- Model responsible AI use for pupils.

Pupils & Students

- May only use AI tools under direct supervision and in line with the acceptable use agreements and awareness / training resources for staff, pupils and students contained in the Trust's [AI Toolkit](#).
- Must not use AI to plagiarise, cheat, impersonate, harass or generate harmful content.
- Must attribute any AI-assisted content appropriately.

8. AI Tool Approval and Usage

8A. Acceptable Use of AI includes:

- Lesson planning, curriculum resource generation and feedback generation.
- Administrative communication (e.g. letters, meeting notes), translation and accessibility support.
- Professional learning/CPD, research and innovation under human oversight.
- Differentiated or personalised learning strategies under teacher supervision.

8B. Unacceptable Use of AI includes:

- Generating, requesting, or distributing harmful, misleading, or discriminatory content.
- Creating, editing, or sharing AI-generated, digitally altered, or deepfake nudes and semi-nudes, or explicit and abusive media
- Unmonitored or unauthorised engagement with AI chatbots simulating human conversation or relationships.
- Using unapproved or unverified tools.
- Breaching privacy, copyright, or intellectual property rights.
- Using AI to plagiarise, impersonate, or replace professional judgement.

Any unacceptable use will be subject to disciplinary action and reported where legally required.

AI and related technologies will not be used for surveillance, profiling monitoring, or performance prediction without express, informed agreement and a documented lawful basis. Any such proposal requires DPIA, EIA, Trade Union consultation, and Board approval.

No significant decision affecting employment access, terms, or quality of work will be made solely by automation; a named manager will review all such decisions, and affected staff will have the opportunity to respond before they are finalised.

8C. AI Conditions of Use

All AI use within Plymouth CAST must comply with the following conditions:

- Only Trust-approved tools may be used.
- Users must understand each tool's capabilities, risks, and limitations.
- AI outputs must always be checked for factual accuracy and bias.
- AI must never be the sole basis for employment, grading, or disciplinary decisions.
- Any use of personal or pupil data must follow a completed and approved DPIA.
- AI-generated material must be clearly attributed where relevant.

8D. Approval Process

Before using an AI tool:

1. Submit a proposal to the Headteacher and AI Lead. All proposals must include rationale, costs, vendor information, implementation timeline, workforce/service impact, and monitoring mechanisms.
2. Complete an Equality Impact Assessment (EIA), a Data Protection Impact Assessment (DPIA), Health & Safety Risk Assessment and a Safeguarding Risk Assessment.
3. Ensure tool meets the DfE *Generative AI Product Safety Expectations* and complies with DfE *Cyber Security Standards for Schools and Colleges*.
4. Receive written approval prior to implementation, with agreement required from both the AI Lead and the Headteacher.

A live register of approved tools and uses will be maintained and reviewed by the Trust annually.

Local AI Champions may contribute to the assessment of proposed tools before formal submission for Headteacher and Trust AI Lead approval.

9. Curriculum and Pupil/Student Use

This policy should be read alongside the AI Acceptable Use Agreement for Pupils/Students, which defines expectations for learners when engaging with AI in a school or Trust context.

- Pupils will be educated about the ethical, safe, and responsible use of AI as part of the computing, digital literacy and online safety curriculum.
- AI will be introduced in context-appropriate ways, including its benefits, limitations, and social impact, and associated online safety risks (such as synthetic media and conversational AI)..
- Teachers will guide pupils in developing critical awareness and discourage overreliance on AI for learning.
- AI can support differentiated instruction, particularly for SEND and EAL pupils
- Teachers may use AI for accessibility, such as translation and adaptive tools
- Where appropriate, pupils will be consulted in developing AI expectations

Prohibited Pupil Uses Include:

- Use of AI in any unmonitored or unsupervised setting
- Use of AI to complete homework or assessments dishonestly
- Submitting unattributed AI-generated work
- Using AI to generate, request, or share offensive, discriminatory, or harmful content, including AI-generated, digitally altered, or deepfake nudes and semi-nudes.
- Unauthorised or unmonitored interaction with conversational AI chatbots.

10. Assessment, Plagiarism, and Academic Integrity

- Use of AI in coursework or formal assessment must strictly comply with JCQ guidelines, individual awarding organisation rules, and relevant qualification frameworks.
- Any AI use in assignments must be clearly referenced and acknowledged (e.g. *"This text was assisted using ChatGPT, 1 July 2025"*).
- Submitting AI-generated content as a student's own unaided work constitutes malpractice and academic misconduct.
- Automated AI detection tools may be used alongside teacher analysis, but professional educator judgment remains the primary basis for evaluating work authenticity.
- Allegations of misuse will be investigated and managed under the school's academic misconduct protocols, CAST Model Behaviour Policy, and exam board malpractice procedures where applicable.

11. Use of AI During Inspections

During Ofsted inspections, staff must be prepared to evidence that AI use within the Trust supports, rather than substitutes, professional judgment. All documentation, reports, and data used during inspection must remain accurate, verifiable, and transparent about whether AI was involved in their preparation.

12. Transparency in AI-Assisted Evidence

When AI tools are used in the preparation of materials, leaders and staff must be able to demonstrate clear oversight and ownership of the final output. AI must not be presented as a substitute for staff knowledge or accountability. Ofsted inspectors will expect clarity on this point during reviews.

13. Data Protection and Intellectual Property

- Staff must never enter personal or sensitive data into AI tools unless explicitly authorised by the Trust's DPO.
- AI tools must not be used to upload or analyse pupil work unless a DPIA has been completed.
- Student work is the intellectual property of the pupil unless rights have been otherwise agreed.
- Staff must ensure AI tools do not retain or use any uploaded Trust or School content or data for training purposes.

14. Training and Professional Development

All staff (including teaching, non-teaching, and support staff in accordance with KCSIE 2026) will receive annual training covering:

- How AI works and the current landscape of tools (including generative AI and conversational AI chatbots)
- Legal and ethical responsibilities, including UK GDPR and intellectual property
- Safeguarding and online safety considerations, including identifying synthetic media, deepfakes, and AI-generated nudes and semi-nudes.
- Filtering and monitoring protocols and escalation pathways for reporting AI-related online safety concerns.
- How to critically evaluate AI outputs for accuracy, bias, and appropriateness

AI Champions will receive enhanced training to act as first-line support and mentors for colleagues within their schools.

Training will be aligned with this policy and form part of Plymouth CAST's commitment to ethical, safe, and effective AI use across all schools.

Ongoing CPD will be embedded into:

- Trust-wide CAST Headteacher Briefings, which will provide strategic updates and examples of best practice
- Staff meetings
- Trust-wide resources, including the Firebird Artificial Intelligence Toolkit
- National resources, including the Department for Education's AI training modules and the "Safe and Effective Use of AI in Education" toolkit

The Trust AI Lead and Headteachers will support implementation, monitor training needs, and ensure that staff have access to up-to-date professional learning opportunities relevant to their role and setting.

The Trust is committed to protecting jobs and avoiding compulsory redundancies arising from AI adoption. Where restructuring is unavoidable, consultation will cover structures, grading/banding, training, and fair selection processes.

15. Breaches and Misuse

Staff

- Breaches of this policy will be dealt with under the Staff Code of Conduct.
- This includes inputting personal data into unauthorised tools or generating inappropriate content.

Pupils

- Breaches will be managed through the CAST Model Behaviour Policy and may constitute academic misconduct.

Governors

- Misuse will be addressed through the Code of Conduct and escalation to the Chair of the Local CAST Board or Trust Board as needed.

Compliance Considerations:

- Serious breaches must be escalated to the DPO/DSL
- A Trust-wide log of AI-related incidents will be maintained

16. AI Systems Register

The Trust will maintain and publish an AI Systems Register detailing each tool's purpose, lawful basis, data categories, locations of use, ownership, change history, risk rating, permitted use cases, and links to relevant DPIA/EIA. The register will be accessible to staff, with a public summary published where appropriate.

17. Monitoring and Review

- This policy will be reviewed annually or earlier if significant AI or legislative developments occur or if Ofsted updates its approach to AI regulation.
- The Trust AI Lead will monitor use across the Trust and report to the CAST Trust SELT and Board of Directors (Audit & Risk Committee).
- Headteachers will monitor use across the school and report to the Trust AI Lead and Local CAST Board.
- AI Champions will contribute to school-level self-evaluation reports on AI use, supporting the Trust AI Lead in identifying strengths, risks, and emerging needs.
- Significant AI adoption or material change will be brought to the Joint Negotiating Committee at a formative stage, with sufficient time for feedback, alternatives, and (where needed) access to independent experts.
- Feedback from staff, pupils, and parents will inform updates.
- The AI Policy will be published on each school's website and referenced in Acceptable Use Agreements.

18. Related Policies

- Plymouth CAST Data Protection Policy
- Plymouth CAST Safeguarding and Child Protection Policy
- Plymouth CAST Model Behaviour Policy
- Plymouth CAST Staff Code of Conduct
- Plymouth CAST ICT Acceptable Use Policy
- Plymouth CAST Online Safety Policy
- Plymouth CAST Curriculum Policy
- Plymouth CAST Equal Opportunities Policy and Procedure
- Plymouth CAST Whistleblowing Policy
- Plymouth CAST Digital Strategy
- Plymouth CAST Mobile Phone Policy
- DfE Generative AI Product Safety Assessment Framework

Appendix 1 - Artificial Intelligence Champion Role Descriptor

Purpose:

The AI Champion acts as the school's point of contact for Artificial Intelligence (AI) practice and innovation. The role supports safe, ethical and effective use of AI across teaching, learning and administration, ensuring that all activity aligns with Plymouth CAST's Catholic values, safeguarding duties (including KCSIE 2026) and data-protection requirements.

Key Responsibilities:

- **Promote safe and ethical practice:** Model responsible AI use and encourage colleagues to adopt inclusive, transparent and values-led approaches.
- **Support colleagues:** Offer first-line guidance and share best practice to build confidence and digital literacy, and risk awareness among staff.
- **Tool evaluation:** Work with the Headteacher and Trust AI Lead to review, pilot and evaluate AI tools prior to approval, ensuring compliance with DPIAs, DfE Product Safety Expectations, safeguarding standards and curriculum needs.
- **Professional learning:** Participate in Trust-wide training and AI Champion network meetings; cascade learning to school colleagues, including online safety considerations such as synthetic media and deepfakes.
- **Monitoring and feedback:** Contribute to school-level AI reports, support annual filtering and monitoring reviews where requested, and provide feedback to the Trust AI Lead on emerging issues, risks or opportunities.
- **Continuous improvement:** Stay informed about developments in educational AI and share relevant insights with staff teams.

Reporting Line:

Reports to the Headteacher (school-level) and works in collaboration with the Trust AI Lead.

Skills and attributes:

- A strong interest in emerging AI technologies and their role in enhancing teaching, learning and operational efficiency.
- Clear and supportive communication skills, with a collaborative and approachable manner.
- A sound understanding of data protection and safeguarding principles as they relate to digital tools.
- A proactive mindset with a willingness to learn, share insights and support colleagues in adapting to change.

Time commitment:

This role is undertaken alongside the staff member's core duties and should be formally recognised within the school's leadership, performance management, or professional development frameworks.

The level of engagement and time commitment may vary throughout the year according to the school's priorities and the evolving nature of AI. Adequate time should be allocated to enable the AI Champion to fulfil their responsibilities effectively.

Review and oversight:

The role and impact of the AI Champion should be reviewed regularly by the school leadership team and governors. This review should include:

- Which AI tools have been assessed and approved and how effectively they are being used.
- The quality and reach of training, guidance and support provided to staff, pupils and students.
- Whether the AI Champion has the necessary knowledge, time and resources to carry out the role successfully.
- How this work contributes to broader strategic goals around digital innovation, safety and staff development





 Collaboration We are one team, being the best we can be. We achieve more altogether - one Trust, one family of schools, one community. We are united through our faith, families and staff.	 Ambition We want our children to be happy and to flourish, achieving well. Across all areas, we work as one team to drive up standards. We are courageous in our decision making and aspirations. Through the strength of our ambition, we create a distinct brand and culture.	 Stewardship Justice, forgiveness and integrity are central to the gospels and drive our decision-making. Underpinning this is a relentless approach to safety, reliability and consistency. As key influencers of our children's impact on society and the environment, we encourage sustainable and brave decision-making, based on a beliefs-led approach.	 Trust We are authentic, transparent, open and honest. Through compassion and kindness, we show humility to each other.
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This page contains Plymouth CAST branding graphics and visual representations of the Trust's mission and values. The Trust's mission is to create outstanding schools where pupils flourish in safe, happy and stimulating environments inspired by the Gospel. The Trust's core values are collaboration, ambition, stewardship and trust.

