

# **HSSE ASSURANCE**

## **OVERVIEW OF HSSE ASSURANCE**

**The Park Federation Academy Trust**

**The Park Federation Academy Trust  
Use of Artificial Intelligence (AI)**

## Version History

Version	Date	Status and Purpose	Changes overview
1	April 2025	Draft	
2	September 2026	Final	Approved

## Approval

Dr. Martin Young Dr. Martin

**Signed by CEO and Federation  
Principal on behalf of the Board  
of Directors**

**Young.**

**Date of approval** September 2025

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## Introduction

This policy is to be used in conjunction with the Data Protection Act (2018) [and](#) the EU Artificial Intelligence Act, including all its updated information. The policy follows guidance set by the DfE and will be updated in accordance when needed too

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

This policy works hand-in-hand with The Park Federation Academy Trust (TPFAT) policies: Data Protection, ICT, Internet and Email Acceptable use, Social Media, Code of Conduct and The Park Federation Privacy Notices.

## Section 1: Purpose that includes Ethics

1.1. Explanation of the purpose of the policy:

The purpose of this policy is to establish guidelines for ethical, secure, and responsible use of Artificial Intelligence (AI) technologies across The Park Federation Academy Trust, beyond and as part of our Digital Strategy. This policy aims to provide clear guidelines for all users—pupils, teachers, leaders, governors, and administrators—on the appropriate use of AI in the workplace and aims to provide a framework that ensures privacy, data security, and ethical considerations are paramount. By ‘appropriate’ it means AI is used to support our work with users always the final decision-maker.

The aspect of generative AI needs particular consideration.

What is Generative Artificial Intelligence?

Generative artificial intelligence, also known as generative AI or gen AI, is a type of artificial intelligence (AI) that can create new content, including conversations, stories, images, videos, and music. It uses Large Language Models (LLMs) to do so. LLMs have been identified for use in the workplace on work devices currently within our workspace.

Throughout our use of any artificial intelligence:

The Park Federation Academy Trust recognises that AI is to be used to support, not replace, human decision-making. We believe that each individual should understand and control how AI affects the quality of their work. This policy endorses the ethical considerations outlined by the European Commission <https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai>. These principles will be part of all training on use of Artificial Intelligence.

## Section 2: Scope

2.1. This policy applies to all staff and other stakeholders across The Park Federation Academy Trust, encompassing all those who may interact with or use AI in our schools.

2.2. The successful implementation of this policy requires the participation and cooperation of Trust and school leadership, teachers, support staff, administrative staff, students, governors, and parents/guardians across the Trust.

## Section 3: Policy Statement

3.1. Our Trust is committed to leveraging the benefits of AI to enhance teaching and learning as well as streamline administrative processes. These goals are to be achieved while upholding our ethical responsibilities and for staff to have final oversight of outcomes that have been supported by AI. We believe in the potential of such technology to support personalised learning, improve teacher workload whilst still improving educational outcomes, and to streamline administrative processes. However, we also recognise the importance of using AI in a manner that respects privacy, promotes fairness, prevents discrimination and is in line with the Federation Code of Conduct. This policy provides the framework for achieving these goals.

3.2. The deployment of AI across the Trust must align with our mission to provide high-quality education that prepares our students for success in the 21st century.

## Section 4: Responsibilities

4.1. The implementation and maintenance of this policy are shared among various individuals and groups across The Park Federation Academy Trust:

- Board of Directors review this policy as needed
- School leadership, including governance, are responsible for providing the needed resources, guidance and monitoring of this policy, evaluating for effective practice and identifying next steps in line with policies
- Teachers are tasked with the implementation of the policy in their classrooms, including delivering instruction on the ethical and responsible use of AI. Teachers must remain the final decision-makers when using AI.
- Support staff and administrative staff are responsible for ensuring that AI is used in accordance with this policy, which includes data privacy and security measures. These staff also ensure they use AI to support their work and oversee the final outcome using their own decision-making
  - Students: As part of the online safety curriculum, students will have lessons on the ethical use of AI. They are not expected to use an LLM though age appropriate aspects may be included in some of the packages an academy uses e.g. Century, Accelerated Reader etc.
- Parents/guardians are encouraged to ensure that their children use AI responsibly.

## Section 5: Data Privacy and Security

Following the European Commission's "Ethics guidelines for Trustworthy AI", The Park Federation Academy Trust

will ensure AI use is:

- Lawful- respecting all applicable laws and guidance
- Ethical - respecting ethical principles and values
  - Robust- both from a technical perspective whilst taking into account its social environment.

The Park Federation Academy Trust is committed to using AI that is technically robust and safe; that has gone through rigorous procedures to verify this. Technologies that have LLMs built into them must undertake a risk assessment by The Park Federation Academy Trust.

A new potential tool identified for use by any one academy must be signposted to the Chief Operating Officer who will work with the IT department to ensure the risk assessment procedures are carried out.

### **5.1 Commitment to Privacy and Data Governance**

The Trust is committed to protecting the privacy of our pupils, staff, school and community. We adhere to the General Data Protection Regulation (GDPR) guidance and this is reminded to all colleagues at the start of each academic year.

Staff members are prohibited from inputting information into an LLM which could compromise the rights, privacy or security of a pupil or a member of staff through the subsequent identification of said individuals. Similarly, it is prohibited for staff members to input information into an LLM which could lead to damage to the reputation of The Park Federation or any of its academies in line with our social media policy.

### **5.2 Data Protection**

The Trust has implemented measures to protect data from unauthorised access use, disclosure, alteration or destruction as referenced in our Data Protection Policy.

Measure controls will include annual staff training, regular reminders and annual review to policies.

### **5.3 Data Sharing**

We share data with third parties for educational purposes only and in compliance with relevant laws and regulations. We ensure third parties with whom we share data, respect the privacy of our students, staff, and community and have appropriate measures in place to protect the data. The Chief Operating Officer would need to know of all new third-party requests for data sharing.

## **Section 6: Access, Equity and Ethics**

The Park Federation Academy Trust is committed to ensuring equitable access to AI for all pupils and staff. We will work diligently to ensure that where appropriate, everyone has the tools, resources, and training necessary to use these technologies effectively. Furthermore, measures will be taken to ensure that where appropriate, AI is accessible to all, including those with special educational needs, to avoid any form of discrimination or bias.

When using AI and data technologies, we will use ethical principles such as set out in the EU AI Act:

- ‘Human agency and oversight: AI systems should empower human beings, allowing them to make informed decisions and fostering their fundamental rights.
- Technical Robustness and safety: AI systems need to be resilient and secure. They need to be safe, ensuring a fall-back plan in case something goes wrong, as well as being accurate, reliable and reproducible. That is the only way to ensure that unintentional harm can be minimised and prevented.
  - Privacy and data governance: besides ensuring full respect for privacy and data protection, adequate data

governance mechanisms must also be ensured, taking into account the quality and integrity of the data, and ensuring legitimised access to data.

- **Transparency:** the data, system and AI business models should be transparent. Traceability mechanisms can help achieving this. Moreover, AI systems and their decisions should be explained in a manner adapted to the stakeholder concerned. Humans need to be aware that they are interacting with an AI system, and must be informed of the system's capabilities and limitations.
- **Diversity, non-discrimination and fairness:** Unfair bias must be avoided, as it could have multiple negative implications, from the marginalisation of vulnerable groups, to the exacerbation of prejudice and discrimination. **Fostering diversity:** AI systems should be accessible to all, regardless of any disability, and involve relevant stakeholders
- **Societal and environmental well-being:** AI systems should benefit all human beings, including future generations. It must hence be ensured that they are sustainable and environmentally friendly. Moreover, they should take into account the environment, including other living beings, and their social and societal impact should be carefully considered.
- **Accountability:** Mechanisms should be put in place to ensure responsibility and accountability for AI systems and their outcomes. Auditability, which enables the assessment of algorithms, data and design processes plays a key role therein, especially in critical applications. Moreover, adequate and accessible redress should be ensured.' (Source: EU AI Act)

In addition, the Trust will promote:

- **Transparency:** We believe in the importance of transparency in the use of AI. This would include being open as to when and how AI is being used. Each staff member would be expected to sign an Acceptable User Agreement for AI Use (see Appendix Item 1).

## **Section 7: Acceptable Use**

The Park Federation Academy Trust advocates the safe and responsible use of AI so learning environments stay conducive to our aims. Our use must be guided by the following principles (which are reflected in the AI Acceptable Use Agreement):

- **Organisational Purpose-** AI should be used in a way that aligns with our educational and organisational aims
- **Respect and Integrity -** users must respect the rights of others, act honestly and maintain integrity
- **Privacy.** AI must not be used to generate content containing details of a pupil; it must not generate content containing details of a staff member without their consent
- **Security.** Users must take steps to protect the security of the AI Use. Use of Gemini AI is preferable via The Park Federation Academy Trust Google domain. Suspicious use of AI or breaches e.g. bypassing the set security measures etc must be reported.
- **Legal and Ethical Use:** use of AI must comply with the law and code of conduct policies.
- **Responsible Communication.** AI should be used to promote respectful and constructive communication. AI must not be used to bully, harass, intimidate or discriminate against others. It must not be used anonymously for ill effect.
- **'Cyber Hygiene'**. This includes regularly updating systems, using strong passwords and not sharing login information.
- **Critical Consumption.** AI should be used with caution and a critical approach. Information should be verified with other sources; it should be checked to consider if the content matches the intent and if it contravenes any expectations.

In conjunction with this policy, all staff and pupils will be asked to sign a specific AI Acceptable User Agreement at the start of each school year. Infringements of these guidelines will be treated as violations of the school policy and will be handled accordingly. It is the responsibility of each individual to use generative AI and other AI technologies appropriately and in a manner that promotes a positive and safe learning environment.

## Section 8: Accuracy and Credibility

The Park Federation Academy Trust recognises that information generated by AI may not always be reliable or credible and may contain “hallucinations” (this is when incorrect and/or misleading information is generated and presented in a way that makes it appear factual).

Therefore, it is the responsibility of staff to ensure that any information used is accurate. The principles below should be used:

### **Understanding AI Limitations:**

It's important to understand that models that use AI, rely on data it has been trained on. AI can generate detail and fact-based content, but it can also produce inaccurate or biased information. Furthermore, AI does not understand the context in the way humans do, and its output should be evaluated with this in mind. The user should always be the final decision-maker and not share any information generated by AI they know to be inaccurate or not reflective of the values of the Trust.

### **Verification of AI-generated information:**

Before using AI generated information for academic purposes, its accuracy should be verified. This could involve cross-referencing the information with trusted sources, using fact-checking websites, or consulting experts in the field.

### **Use of Multiple Sources:**

To ensure credibility of information, especially for academic or research purposes, it should be cross-checked with multiple sources. This helps validate the information and encourages a more comprehensive understanding of the topic.

### **Critical Thinking:**

Critical thinking skills are vital. Information's origin should be questioned, the data it's based on, and the potential biases it might contain.

### **Seeking Guidance:**

Staff should seek guidance from educators, or other professionals when they encounter difficulties in verifying the accuracy or credibility of information.

### **Continual Learning:**

AI technologies are rapidly evolving, and their capabilities continue to expand. Therefore, it's essential to keep learning about these technologies, to stay updated about their potential and limitations, and to know how to use them responsibly.

By adhering to these principles, we aim to foster an environment where AI technologies are used effectively and responsibly, contributing to a rich and informed educational experience.

## Section 9. Continuing Professional Development (CPD)

Professional development will be provided to equip staff with the knowledge and skills they need to effectively use AI. The CPD will include ethical considerations, strategies for AI integration in teaching, and ways to promote digital and AI literacy among students.

## Section 10: Community Engagement

We will keep the wider school community informed about our use of AI, and create opportunities for parents,

students, and other stakeholders to feedback. This will be an ongoing effort, ensuring that our community remains informed and able to contribute to decisions regarding AI use.

## **Section 11: Reviewing and Updating the Policy**

This policy will be reviewed and updated regularly to ensure it continues to serve the best interests of our school community as AI technologies evolve. It will be part of the work of the Tech Team and IT Strategic Group, to receive feedback from its users and stay up-to-date with developments. Emerging trends and feedback from all stakeholders will be considered, ensuring our policy remains current and effective in governing the use of AI within The Park Federation Academy Trust. **Appendix 1: Acceptable Use of AI Agreement**

### **The Park Federation Academy Trust Acceptable Use Policy (AUP) for Artificial Intelligence (AI)**

#### **Purpose**

The purpose of this AUP is to establish guidelines for the ethical, secure, and responsible use of AI technologies across The Park Federation Academy Trust in line with the Data Protection Act (2018). This agreement aims to provide clear guidelines for all users (pupils, teachers, support staff, leaders, governors, and administrators) on the appropriate use of AI in our academies.

#### **Ethical Use of AI**

- Generative AI tools will only be used by members of staff and will not be used by pupils.
- AI can be used to support learning, teaching and administrative tasks. AI is to be a supportive tool with the user expected to be the final decision-maker on what is used in the workplace.
- AI must not be used to produce content that includes personal or sensitive information such as safeguarding reports, SEND reports or HR-related information.
- Staff must use AI tools in a manner that upholds the Trust's values and maintains the integrity of the educational environment.

#### **Privacy and Security**

- Personal data must be handled responsibly and securely.
- All users must comply with the General Data Protection Regulation (GDPR) and other relevant data protection laws when using AI tools.

#### **Acceptable Use Principles**

- AI technologies to be used for educational or administrative purposes.
- Unethical activities, including cheating, plagiarism and violating privacy are strictly prohibited.
- AI-generated output must be used critically, responsibly and without over-reliance.
- Generative AI tools should not be used live in the presence of pupils as all AI-generated content must be verified for accuracy, reliability and suitability.
- Only AI tools approved by the Trust for educational purposes should be used within the Trust's network and Google workspace. Any unapproved tools or apps are prohibited.

#### **Cyber Hygiene**

- Regular updates, strong password and not sharing credentials are essential.

#### **Assessing AI-Generated Information**

- Verify all AI-generated output for accuracy and reliability.
- Critical thinking and cross-verification with multiple sources are essential.
- Users should be aware of potential biases in AI technologies and are encouraged to use AI tools in ways that promote inclusivity and fairness.

#### **Responsibilities**

- All staff are expected to follow these guidelines for safe and positive use of AI.
- All staff are responsible for

monitoring adherence to this policy. Where a member of staff has good reason for concern regarding the ethical use of AI, they should follow the procedures in the whistleblowing policy.

- The Park Federation will provide ongoing professional development opportunities to staff to promote digital literacy and responsible use of AI tools.

**Violations and Consequences**

- Breaches of this policy may result in appropriate disciplinary actions.

**Review and Updates**

This policy will be reviewed regularly to reflect evolving AI technologies.

**Approved uses of AI Technologies**

AI tools can be used to support learning, teaching and administrative tasks, providing that all AI generated output has been verified by an appropriate human decision-maker to ensure it is reliable, accurate and suitable.

Examples of acceptable uses in the workplace:

- Supporting the creation of learning and/ or admin resources
- Summarising documents
- Supporting the writing of letters and emails
- Generating images for a specific purpose e.g. to aid learning
- Creating knowledge organisers
- Creating model texts
- Writing questions
- Creating training materials
- Tone-checking
- Simplifying tasks
- Creating homework tasks
- Assisting with lesson planning
- Assisting with content for the academy website
- Writing school newsletters
- Assisting with content for written work
- Creating assessments such as low-stake quizzes

**I confirm that I have read and understood the above information on the use of AI. Print Name**

.....

**Sign**.....

**Date**.....

Items featured in this agreement were first discussed by Senior Leadership Teams in their schools and then further discussed by the Principals of the Trust academies. December 2024.

## Appendix 2 - Purpose and Vision setting statements created by Principals

### Purpose

Understanding and using AI can keep staff members abreast of AI advancements that their own pupils may be using now and in the future. Moreover, AI can enable teachers to model how to adopt a critical mind in the use of AI and mean we are fulfilling one of the aims of TPFAT in preparing children and adults for the working world of the future.

At The Park Federation Academy Trust, we will use artificial intelligence to improve efficiency as well as to facilitate healthy workloads. AI can be used to fill the gaps teachers may have in their subject knowledge and help them to teach effectively across the curriculum. AI can also support the quicker creation of personalised resources that would otherwise take a great deal of time to create. Creation of personalised resources can support improved progress for a pupil.

### Vision

*If, as a Trust, we are using AI highly effectively- what will this look like?*

Pupils from TPFAT academies will be well-prepared for the use of AI once in secondary schools. They will know the benefits and drawbacks of AI. This knowledge will help them to make well-informed decisions when encountering AI. Pupils will learn and use the specific language of digital literacy and this will put them on at least par with others. AI Education will be delivered through specifically designed lessons that enable pupils to understand benefits and drawbacks, recognise potential use of AI and the ethical use of AI.

will be woven into the fabric of the children's education. This will mean our pupils are strong, healthy digital citizens well placed to help themselves and others.

Teachers will receive training and take part in professional dialogue about the subject. They will be critical thinkers and discerning users of AI. They will know when best to use AI and when not. They will not be over reliant on AI and the end goals of pupil attainment will be kept in mind at all times. AI will enhance teaching and learning, and teachers will happily receive feedback to aid their improved use of the technology. Teachers will be suitably confident in their ability to utilise AI. AI will never be used live in lessons.

Administrative staff, including colleagues in our Central Trust Team, will use AI to boost efficiency. It will be used smartly to ease workloads but contain no personal data. Central Trust team colleagues and other administrators will be included in all appropriate AI training.