



The LETTA Trust

Use of Artificial Intelligence (AI) Policy

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Reviewed by:	Trust Board	Signed:	



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1. Aims and scope

1.1 Introduction

At the LETTA Trust, we acknowledge that Artificial Intelligence (AI), including generative AI tools such as Google Gemini, has the potential to enhance teaching and learning, support staff efficiency, personalise educational experiences, and foster creativity and innovation across our schools.

At the same time, we recognise that the use of AI introduces potential risks, such as data protection breaches, copyright infringement, ethical concerns, safeguarding issues, misinformation, bias, and compliance with legal and regulatory obligations. This policy establishes a framework for the safe, ethical, and responsible use of AI technologies throughout our schools, one that enables us to fulfil our commitment to the underpinning philosophy of Ubuntu, a belief that our humanity is interconnected and strengthened through our relationships with others.

1.2 Guiding and regulatory principles

At LETTA we will use AI in a manner consistent with our values of **Innovation, Aspiration, Equality, and Generosity**. We will:

- **Promote innovation** by exploring AI technologies that enhance teaching, learning, and operational effectiveness
- **Raise aspirations** by preparing pupils and staff for a future in which AI and digital technologies play an increasingly important role
- **Champion equality and inclusion** by ensuring AI is used fairly and supports positive outcomes for all learners
- **Put people first** by using AI to support, rather than replace, human relationships, professional judgement, and decision-making
- **Prioritise safeguarding, safety, and security** by ensuring AI systems are safe, reliable, secure, and appropriate for educational use
- **Promote transparency and explainability** by being open about our use of AI and ensuring that AI-generated outputs are reviewed and understood by users
- **Maintain accountability and good governance** by establishing clear roles, responsibilities, and oversight for the procurement, implementation, and use of AI
- **Protect privacy and personal data** by complying with UK GDPR, data protection legislation, and Trust policies
- **Support ethical and responsible use** by ensuring AI is used lawfully, fairly, and with integrity



- **Enable challenge and redress** by ensuring that human judgement remains central to decision-making and that concerns relating to AI can be raised and addressed appropriately
- **Commit to continuous improvement** by regularly reviewing developments in AI, evaluating risks and opportunities, and sharing best practice across the Trust

These principles underpin our decisions relating to the selection, implementation, and use of AI technologies within the LETTA Trust.

1.3 Scope

This policy applies to:

- all employees of The LETTA Trust
- trainees and apprentices
- local governing board members and trustees
- volunteers, contractors and agency staff working within Trust schools
- all pupils who attend our schools

It also applies to:

- any AI system or smart tool that is opened using school computers, tablets, or Chromebooks
- any AI tool accessed through the school internet network or school login accounts
- any AI tool used to help with schoolwork, lesson planning, or the daily work of our schools.

2. Legislation and guidance

This policy has been developed by The LETTA Trust with reference to current legislation, government guidance, and sector best practice relating to the use of AI in education. In particular, this policy reflects the principles and recommendations contained within:

- [Generative artificial intelligence \(AI\) in education](#), published by the Department for Education (DfE)
- [Generative AI: product safety standards](#), published by the Department for Education (DfE)
- [How Ofsted looks at AI during inspection and regulation](#), published by Ofsted
- Relevant guidance issued by the Information Commissioner's Office (ICO) relating to data protection, automated decision-making, and the use of AI

This policy also supports compliance with the following legislation:



- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data \(Use and Access\) Act 2025](#)
- [Data Protection Act 2018 \(DPA 2018\)](#)
- [Equality Act 2010](#)
- [Copyright, Designs and Patents Act 1988](#)
- [Keeping Children Safe in Education \(KCSIE\) guidance 2026](#)
- [Human Rights Act 1998, where applicable](#)

The Trust will review this policy regularly to ensure it remains aligned with emerging legislation, regulatory requirements, government guidance, and developments in AI technology.

3. Roles and responsibilities

3.1 Trust board

The Trust Board will:

- take overall responsibility for monitoring this policy and holding the Chief Executive Officer (CEO) to account for its implementation in line with the trust's IT strategy
- ensure headteachers are appropriately supported to make informed decisions regarding the effective and ethical use of AI across the trust
- sign off on approved uses of AI, or new AI tools, taking into account advice from the Chief Operating Officer (COO), Data Protection Officer (DPO), and data protection impact assessments

3.2 Chief Executive Officer (CEO)

The CEO is accountable to the Trust Board for the implementation of this policy. The CEO will:

- propose this policy, and any revision to it, to the Trust Board for approval, and ensure that it is reviewed in line with Section 12 of the policy so that it keeps pace with developments in technology, legislation and guidance
- hold headteachers to account for the application of this policy in their schools, and ensure that it is applied consistently across the Trust
- ensure that headteachers, the COO, the DPO and the Designated Safeguarding Leads (DSLs) are appropriately supported to carry out the roles given to them by this policy
- ensure that the DSLs take lead responsibility for understanding the filtering and monitoring systems in place, including as those systems apply to generative AI tools
- ensure that all staff receive training on the safe, effective and ethical use of AI and on the risks it presents, as part of induction and of the Trust's annual training cycle, and that completion is recorded



- ensure that decisions about the adoption of AI across the Trust are taken in support of the Trust's Strategic Plan and Education Development Plan, and that the educational case for any tool is considered alongside its operational benefits
- consider any concern raised under Section 9 that cannot properly be considered by a headteacher, including a concern relating to a headteacher.

3.3 Chief Operating Officer (COO)

The COO leads the implementation of this policy across the Trust, as part of their responsibility for Trust-wide operations including IT and data protection. The COO will:

- maintain the Trust Approved AI Tools Register at Appendix 1, and approve additions to and removals from it, on the advice of the DPO, the DSLs and IT Services
- ensure that the risk assessment required by Section 4.1 is completed before any AI tool is approved, and that a data protection impact assessment is completed where the Information Governance Policy requires one
- ensure that AI tools are procured in accordance with the Trust's Tendering Policy and the financial limits set out in the Scheme of Delegation
- ensure that risks arising from the use of AI, including dependency on a single supplier and the failure or withdrawal of a tool, are reflected in the Trust risk register and reported to the Audit and Risk Committee
- work with the DPO to ensure that the Trust's use of AI complies with data protection law, and that privacy notices are updated where necessary
- work with IT Services and the DSLs to ensure that filtering, monitoring and information security controls address generative AI tools
- ensure that staff across the 5 schools have access to consistent guidance and training on the use of AI, and that this policy is applied consistently
- authorise any review of Trust systems, accounts or devices under Section 11.1.7
- report annually to the CEO and the Trust Board on the operation of this policy, including the contents of the register and any incidents arising.

3.4 Headteachers

Headteachers will:

- make sure that all staff in their individual schools follow the guidance set out in this policy
- ensure that pupils are taught how to use AI tools effectively and understand any potential risks
- work closely with the DSL to ensure that AI tools are safe for children and comply with safeguarding requirements

3.5 Data protection officer (DPO)



The DPO is responsible for monitoring and advising on compliance with data protection law, including in relation to the use of AI.

LETTA's DPO is Louise Manthorpe and is contactable via dpo@letta.org.uk.

3.6 Designated safeguarding lead (DSL)

The DSL in each LETTA Trust school is responsible for ensuring that safeguarding considerations relating to the use of AI are appropriately identified, monitored, and managed. DSLs will:

- monitor emerging safeguarding and online safety risks associated with AI technologies
- provide or support staff training on AI-related safeguarding concerns and safe practice
- respond to safeguarding incidents involving AI in accordance with *Keeping Children Safe in Education (KCSIE)* and the school's Child Protection and Safeguarding Policy
- work with IT services and the COO to ensure that filtering, monitoring, and other safeguarding controls remain effective in an evolving technological landscape
- advise staff on safeguarding considerations relating to the use of AI by pupils and adults within the school environment

Details of each school's DSL and safeguarding team can be found on the school's website and within our safeguarding policy.

3.7 All staff

The LETTA Trust recognises the potential of AI to enhance teaching, learning, and operational efficiency. Staff are encouraged to explore appropriate uses of approved AI tools where these support educational outcomes and reduce administrative workload. Staff can only use AI tools listed in the Trust Approved AI Tools Register at Appendix 1, and only within the approved uses and restrictions recorded there. Personal, confidential or otherwise identifiable information must not be entered into any AI tool unless the register records that the tool has been assessed as suitable for that purpose and the necessary data processing agreement is in place. All staff using AI must:

- use only Trust-approved closed generative AI tools and platforms (see Section 5 and Appendix 1)
- comply with all Trust policies relating to safeguarding, data protection, information security, acceptable use, and intellectual property
- report any safeguarding, data protection, security, or ethical concerns immediately
- ensure that personal, confidential, sensitive, or identifiable information is not entered into public AI systems unless specifically authorised and protected by appropriate safeguards



- verify the accuracy, suitability, and reliability of AI-generated content before using or sharing it
- exercise professional judgement and remain accountable for all decisions, communications, and materials produced with AI assistance
- adhere to the guidelines below to protect data when using generative AI tools
- seek advice from the DPO, COO and the DSL, as appropriate
- acknowledge or reference the use of generative AI in their work

Staff also have a responsibility to develop pupils' understanding of AI by promoting safe, ethical, and critical use of these technologies. This includes helping pupils recognise the strengths, limitations, risks, and potential biases of AI-generated content.

3.8 Pupils

Pupils must follow the guidelines set out in Section 6 of this policy, 'Use of AI by pupils'.

4. Approval and risk assessment of AI tools

The LETTA Trust operates a formal approval process for all AI tools and applications used within its schools and services. No AI tool may be used with pupils, staff data, or Trust systems unless it has been reviewed and approved by Trust Leadership. Approval will be undertaken by the COO in consultation with the DPO, IT services and/or DSLs and other relevant bodies.

Staff must always consider whether AI is the right tool to use. Just because the school has approved its use doesn't mean it will always be appropriate. Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact the Headteacher to discuss any ideas they may have with regard to using AI, so that they, in consultation with others, can decide whether it is an appropriate new method of working.

4.1 Risk assessment

Before approval, all AI tools must undergo an appropriate risk assessment to determine whether the educational or operational benefits outweigh any potential risks. The risk assessment will consider:

- data protection and privacy requirements
- safeguarding and online safety implications
- cyber security and information security risks
- equality, fairness, and potential bias
- reliability, accuracy, and transparency of outputs
- compliance with relevant legislation, guidance, and Trust policies
- alignment with recognised safety standards and best practice

4.2 Data protection and privacy



Where the use of an AI tool involves the processing of personal data, a Data Protection Impact Assessment (DPIA) will be completed as required under UK GDPR and the Data Protection Act 2018. The Trust will ensure that:

- personal data is processed lawfully, fairly, and transparently
- appropriate agreements are in place with suppliers
- privacy notices are updated where necessary
- staff understand their responsibilities when using AI systems

No decision that affects a pupil, parent or member of staff will be taken solely by automated means. This includes decisions relating to admissions, attendance, behaviour and exclusions, special educational needs provision, recruitment, appraisal and pay. AI outputs may inform decisions only where a named member of staff reviews the output, applies professional judgement and records the decision.

4.3 Safety checks for tools used by pupils

When we look at AI tools meant for our pupils to use, our safety check must legally consider:

- official age limits set by the AI companies
- *Keeping Children Safe in Education* (KCSIE) guidance and our own school safeguarding policies
- whether IT systems can monitor what is being typed to protect pupils from any harmful content online
- that the software meets government safety standards

The outcome of each assessment is recorded in the Trust Approved AI Tools Register at Appendix 1. The register records which tools have been approved, who may use them, the purposes for which they are approved and the restrictions that apply. The register is maintained by the COO, reviewed at least annually, and is the definitive record of the AI tools that may be used across our schools. A tool that does not appear on the register has not been assessed and must not be used with pupils, with staff data or on Trust systems.

The Trust reserves the right to restrict, suspend, or prohibit the use of any AI tool where concerns are identified.

5. Teaching pupils about AI

The LETTA Trust is committed to developing pupils' digital literacy and preparing them to use emerging technologies safely, responsibly, and effectively. Pupils will learn:

- how AI technologies work and how they are used in everyday life
- the benefits, limitations, and potential risks of AI systems



- how to evaluate the accuracy and reliability of AI-generated content
- how to use digital technologies safely, responsibly, and ethically
- how to recognise and respond to misleading, harmful, or inappropriate online content

6. Pupil use of AI

Generative AI providers set minimum age requirements that are higher than the age of primary pupils. These pupils will therefore not hold individual accounts and will not access generative AI tools independently on school devices or networks. Where AI is used to support learning, it will be led by a member of staff through an approved teacher account, so that pupils see these tools demonstrated, understand what they are doing, and learn where their limitations lie.

The Trust recognises that many of our pupils will encounter generative AI outside school, on family devices and within apps and services they already use, and that some will do so despite the age requirements set by providers. A restriction that applies only in school is therefore not by itself a sufficient response.

Through the teaching described in Section 5, and through our wider online safety curriculum, pupils will be taught how these technologies work, how to question what AI produces, and how to recognise and report content that is misleading, upsetting or harmful.

Pupils are encouraged to tell a trusted adult whenever something they encounter online concerns them, whether it happened at school or at home. Schools will also support parents and carers to understand these tools and to supervise their use at home.

Pupils may use AI tools:

- alongside a member of staff for research, exploration, and supported learning activities
- as part of curriculum activities designed to develop understanding of AI technologies

Where AI has been used to support learning, pupils may be required to acknowledge the use of the tool in accordance with teacher instructions. To support academic integrity and independent learning, pupils must not use AI:

- during controlled assessments
- to complete work that is intended to demonstrate their own knowledge, understanding, or skills
- to generate responses that are submitted as their own original work



Pupils must not use AI to:

- bully, harass, intimidate, or impersonate others
- create, access, or share inappropriate, offensive, or harmful content
- generate discriminatory, abusive, or unlawful material
- circumvent school safeguarding, filtering, or monitoring systems

7. Protecting original work and copyright

The LETTA Trust is committed to respecting intellectual property rights and complying with copyright legislation when using AI technologies.

Staff, Trustees, and Local Governing Board members must:

- protect the original work of pupils, staff, and third parties
- avoid uploading copyrighted, confidential, or proprietary materials into public AI systems unless authorised to do so
- ensure that AI-generated content is reviewed before publication or distribution
- exercise caution when using AI-generated text, images, audio, or video, particularly where copyright ownership is unclear

The Trust recognises that children own the legal rights to their original work, which includes anything showing individual effort, creativity, or step-by-step thinking. Materials created by our teachers are also protected by copyright laws. Examples of original creative work include:

- essays, stories, and homework written or typed by a pupil
- artwork, designs, and unique diagrams drawn by a pupil
- step-by-step calculations showing a child's mathematical working out
- detailed lesson plans and teaching resources designed by our staff
- specialised prompts typed into AI applications by staff

We are also highly alert to the legal risks of using AI outputs that might have accidentally copied someone else's work without permission, which is known as secondary infringement. This can happen if we publish AI-generated materials on our public school websites or newsletters, such as:

- publishing a school policy built by an AI tool that copied text directly from another school's document without their knowledge
- using an image or artwork on our website that was generated by an AI tool using stolen pieces of a real artist's copyrighted picture



Schools will stop using a tool and seek formal legal advice if we are ever unsure whether an AI programme is acting within the law.

8. Preventing bias

We are aware that AI tools learn from historical internet data, which means they can easily repeat and spread existing social biases. This is particularly true for automated prejudices regarding protected characteristics including sex, race, and disability. For this reason, our staff must never accept AI answers without checking the content. Critical thinking, common sense, and thorough fact-checking must be applied to every piece of text or image generated by an approved AI tool before it is relied upon or shared. We will:

- provide targeted training so our staff can successfully spot and correct automated biases or machine errors
- regularly review how AI software is being deployed in classrooms to identify and remove any unfair patterns

Schools will provide information and guidance to help parents and carers understand generative AI and support their children to use it safely at home.

Schools will be open with parents and carers about how AI is used. The tools approved for use are listed in the Register at Appendix 1. Where an AI tool processes personal information about a pupil, this is reflected in the school's privacy notices.

Where AI has been used to assist a member of staff in preparing work about a child, a parent or carer may ask for that work to be explained, and for the decision to be reviewed by a member of staff.

A parent or carer with a question or concern about the use of AI should raise it in the first instance with their child's class teacher or with the Headteacher, who will usually be able to resolve it quickly. Where a concern cannot be resolved in that way, including a concern that a child has been treated unfairly as a result of the use of AI, it will be considered under the Trust's Complaints Procedure.

Where the concern relates to how a child's personal information has been used, it should be raised with the Trust's DPO at dpo@letta.org.uk, in accordance with the Information Governance Policy. Parents and carers also have the right to raise a data protection concern with the Information Commissioner's Office.



9. Raising concerns

We encourage staff, Trustees, and members of Local Governing Boards to speak to the Headteacher straight away if they have any concerns about how AI is being used, or if an AI tool has made an error that led to an unfair outcome.

Any safeguarding or child protection concerns arising from the use of AI must be reported immediately to the school's DSL in line with our safeguarding policies.

10. Safeguarding and child protection

We are aware that while AI is helpful, it can sometimes be misused or lead to serious online safeguarding risks. These risks include online grooming, digital harassment, sexual extortion, exposure to child abuse material, harmful advertisements, and cyberbullying. If a parent or staff member encounters a safeguarding concern involving the use of generative AI, it must be reported to the school DSL immediately.

Any such incident will be managed according to the procedures in the school Child Protection and Safeguarding Policy.

11. What happens if the rules are broken?

11.1 By staff

All staff are accountable for their use of AI in the course of their work, and for the decisions, communications and materials produced with AI assistance. The standards expected of staff are set out in this policy and in the Trust's Staff Code of Conduct.

Where a member of staff does not follow this policy, the matter will normally be addressed in the first instance by their line manager, team leader or the Headteacher, and they will provide advice, additional training and supervision. Most instances of non-compliance arise from unfamiliarity with a fast-moving technology rather than from misconduct, and staff are encouraged to raise mistakes promptly. A member of staff who self-reports an error will not be treated less favourably for having done so.

Where the circumstances are more serious, or where a member of staff repeatedly fails to comply, the matter will be dealt with under the Trust's Staff Disciplinary Procedure. A serious breach could amount to gross misconduct. The following are examples of serious breaches:

- entering personal, confidential or sensitive information relating to a pupil, a parent or a colleague into an AI tool that has not been approved for that purpose
- using AI tools to create, adapt or manipulate images of pupils
- presenting AI-generated content as the member of staff's own professional judgement without review, particularly within safeguarding records, special educational needs documentation, assessment records or reports to parents



- using an AI tool to circumvent, or attempt to circumvent, the Trust's filtering, monitoring or information security controls

Where the conduct raises a safeguarding concern, or the allegation is that a member of staff may have harmed a child or otherwise behaved in a way that indicates they may pose a risk to children, the matter will be dealt with under Part Four of *Keeping Children Safe in Education* and the Trust's Safeguarding and Child Protection Policy. This will include referral to the Local Authority Designated Officer (LADO). The LADO will then advise on the appropriate disciplinary process to follow.

Where a breach of this policy involves personal data, it will be reported and managed as a personal data breach under the Trust's Information Governance Policy, whether or not disciplinary action follows.

This policy applies to the use of AI in the course of Trust business, however and wherever that use takes place, including use outside normal working hours. Conduct unconnected with Trust business will be considered only where it calls into question the individual's suitability to work with children, or where it brings or is likely to bring the Trust into disrepute, consistent with the Staff Code of Conduct.

Staff are expected to cooperate fully with any investigation under this policy. For that purpose, the Trust may review activity on its own systems, accounts and devices, including AI tools accessed through Trust accounts, and prompts, outputs and records held on Trust systems. Any such review will be proportionate to the matter under investigation, will be authorised by the COO, and will be carried out in accordance with the Trust's Information Governance Policy and Online Safety Policy.

The Trust will not require a member of staff to surrender a personal device or the credentials to a personal account. Where material relevant to an investigation is held only on a personal device or personal account, the member of staff will be asked to provide it, and the Trust will take advice on what further steps are reasonable and proportionate.

Where the individual concerned is agency staff, a contractor, a volunteer, a trainee or an apprentice, the matter will be addressed under the relevant contractual or placement arrangements, in consultation with the employing agency or partner provider as appropriate.

Nothing in this section prevents a member of staff from making a protected disclosure under the Trust's Whistleblowing Policy.

11.2 By Trustees or members of Local Governing Boards



The Trust's Staff Code of Conduct applies to Trustees and to members of Local Governing Boards, and sets the standards expected of them when using AI.

Where a Trustee or a member of a Local Governing Board does not follow this policy, the matter will be raised with the Chair of the Trust Board, who will consider it in consultation with the CEO and, where the matter concerns data protection, the DPO. Where the concern relates to the Chair, it will be raised with the Members group.

The Trust Board may take any step available to it under the Articles of Association and the Trust's governance arrangements, including requiring additional training, withdrawing access to Trust systems, or removal from office. Where the matter raises a safeguarding concern, then the relevant Section in 11.1 applies.

11.3 By pupils

Where a pupil misuses AI, or breaches the online safety rules in this policy, the matter will be dealt with under the Trust's Behaviour and Anti-bullying Policy and the Acceptable Use Agreement at Appendix 1 of the Trust's Online Safety Policy.

In deciding what response is appropriate, staff will take account of the pupil's age, understanding and any special educational needs or disability, and of the fact that pupils are still learning how these technologies work. The purpose of any response is to keep pupils safe and to help them use technology well.

Parents and carers will be informed where a pupil has misused AI that has led to serious concerns and will be supported to understand the risks these tools present outside school.

Where the misuse raises a safeguarding or child protection concern, including the creation or sharing of AI-generated or digitally altered images of another child, it will be reported to the DSL immediately and dealt with under the Safeguarding and Child Protection Policy. That route takes precedence over any behaviour response.

12. Monitoring and transparency

This policy functions as a live document as the technology is constantly evolving.

It will be continually monitored by the COO and DPO, and it will be formally re-evaluated and presented to the full Trust Board at least once a year. We will also use regular surveys to gather feedback from pupils, parents, carers, and staff to make sure our use of technology continues to support our community safely and effectively.

13. Links with other LETTA policies



This AI policy links directly to our other important trust documents, which you can access on our school websites:

- Data Protection Policy and Privacy Notices
- Child Protection and Safeguarding Policy
- Behaviour and Anti-bullying Policy
- Staff Code of Conduct
- Curriculum Policy
- Assessment Policy
- Online Safety Policy
- Complaints Procedure
- Equality Information and Objectives



Appendix 1: Trust Approved AI Tools Register

The table below lists the specific artificial intelligence tools that have been checked and approved for use across The LETTA Trust.

AI Tool	Approved Users	Approved Uses	Restrictions
NotebookLM	School Leaders and Teachers	Summarising research, analysing policies, organising notes and professional development	Only non-confidential documents may be uploaded. Do not upload documents containing personal data unless approved
Google Gemini	School Leaders and Teachers	Drafting newsletters, generating ideas, creating templates and supporting planning activities	Do not enter personal, confidential or identifiable information
Canva AI (Magic Design and Magic Write)	School Leaders and Teachers	Creating presentations, certificates, displays, visual resources and communications	Do not upload pupil photographs, names or sensitive information without appropriate authority
Happy Scribe	School leaders	Audio recording and transcription service, GDPR and EU approved for confidential use	Recording can only take place with full consent by all participants.
Claude	School Leaders and Teachers	Good for producing Word and Excel files	Do not enter personal, confidential or identifiable information