# AI Strategy

This policy is prescribed by The Good Shepherd Trust and all reference to 'the Trust' includes all Trust schools, the central team and subsidiary organisations.

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|---|---|---|---|
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| Review cycle: | Annually | Is this policy statutory? | No |
| Approval: | Risk & Audit Cttee | Author: | DPO |
| Next Review Date: | 03/2026 | | |

**Revision record**

Minor revisions should be recorded here when the policy is amended in light of changes to legislation or to correct errors. Significant changes or at the point of review should be recorded below and approved at the level indicated above.

| Revision No. | Date | Revised by | Approved date | Comments |
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## 1. Definitions

**Artificial Intelligence** (AI) refers to the simulation of human intelligence in machines that are programmed to think and learn like humans. These systems can perform tasks that typically require human intelligence, such as visual perception, speech recognition, decision-making, and language translation.

There are different types of AI, including:

**Machine Learning** (ML): A subset of AI that involves training algorithms to learn from and make predictions based on data. It's widely used in applications like fraud detection, email filtering, and predictive maintenance.

**Deep Learning**: A subset of ML that uses neural networks with many layers (hence "deep") to analyse various factors of data. It is used in image recognition, speech recognition and autonomous vehicles.

**Natural Language Processing** (NLP): This involves the interaction between computers and humans through natural language. Applications include language translation services, sentiment analysis and chatbots.

**Computer Vision**: This field enables machines to interpret and make decisions based on visual data from the world. It is used in facial recognition, medical image analysis, and autonomous driving.

**Robotics**: AI is used to control robots, enabling them to perform tasks ranging from manufacturing to surgery.

**Generative AI** refers to a type of artificial intelligence that can create new content, such as text, images, music, or even code, based on the data it has been trained on. Unlike traditional AI, which is typically designed to recognise patterns and make predictions, generative AI can produce original outputs that resemble the examples it has learned from. Examples include:

> **Text Generation**: Models like GPT-4 can generate human-like text based on a given prompt. This can be used for writing articles and creating chatbots.
>
> **Image Generation**: Tools like DALL-E can create images from textual descriptions, allowing for the generation of unique artwork or realistic images based on user input.
>
> **Music Generation**: AI models can compose music in various styles by learning from existing compositions. This can be used for creating background scores, jingles, or even full-length songs.
>
> **Code Generation**: AI can assist in writing code by generating snippets or even entire programs based on a description of what the code should do.

Generative AI is powerful because it can assist in creative processes, automate content creation, and provide new ways to interact with technology. However, it also raises ethical considerations, such as the potential for misuse in creating deepfakes or generating misleading information.

## 2. Scope

It is unlikely that anyone involved with GST - pupils, parents, employees, contractors, support services or volunteers - can avoid the use of AI. Using email, websites, mobile device applications, computer tools, dedicated appliances and even automated telephone conversations are likely to have some element of AI built in.

This AI strategy does not cover the use of AI by pupils. Headteachers will want to consider how they will approach any use of AI by pupils in school as well as their approach to homework and whether the homework policy needs revision. The Joint Council for Qualifications (JCQ) has guidance on protecting the integrity of qualifications.

This AI strategy does not cover the use of AI for creating lesson content or similar activities. Staff involved in classrooms will be aware of the many resources available to assist in content creation. Various external organisations provide resources and training on the use of AI is this respect. **This strategy assumes that such activity uses no personal data**.

Safety should be the top priority when deciding whether to use generative AI in a school. Headteachers may choose only to use AI tools with teachers, or only for administrative tasks. They may restrict use by pupils to certain year groups.

## 3. Data protection

In the UK, data protection is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

As a Data Controller, GST must follow the UK GDPR seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy

- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Anyone dealing with data we hold is a data controller and/or a data processor. For example, when teachers mark pupils' work and record outcomes, they are processing data as a data controller.

If used well, AI has the potential to make organisations more efficient, effective and innovative. However, AI also raises significant risks for the rights and freedoms of individuals, as well as compliance challenges for organisations. (ICO)

All GST employees and those in governance are required to undertake GDPR training annually. This is monitored and recorded on the trust's HR system.

GST's data protection officer (DPO) is Peter Coates (peter.coates@goodshepherdtrust.org.uk). The DPO must be notified of any data breach. If you believe you may have shared any personal or sensitive data you are required to notify the DPO, who will take a decision on any next steps.

**4. Intellectual property**

Users in GST must not allow either copyrighted materials or pupils' work to be used to train generative AI models. Permission must be sought from the copyright owner. In the case of a pupil's work, this would need to be from the pupil's parent if they are under 13.

Users must also avoid secondary infringement, where AI products are trained on unlicensed material and the output is used in the school or published more widely, for instance on the school's website.

**5. The use of AI tools**

Due to the exponential growth of the use of AI it is impossible to list all tools available for use within GST. This strategy is updated annually and should be an opportunity to ensure compliance with UK GDPR.

Any system that uses any personal data must not use that data for learning outside of the system.

Any system that processes personal data and uses AI should have a data protection impact assessment (DPIA). This demonstrates how we have addressed the complexities of using AI in GST's culture and processes and is an important aspect of accountability. The ICO states:

> In the vast majority of cases, the use of AI will involve a type of processing likely to result in a high risk to individuals' rights and freedoms and will therefore trigger the legal requirement for you to undertake a DPIA. You will need to make this assessment on a case-by-case basis. In those cases where you assess that a particular use of AI does not involve high risk processing, you still need to document how you have made this assessment.
>
> If the result of an assessment indicates residual high risk to individuals that you cannot sufficiently reduce, you must consult with the ICO prior to starting the processing.
> (ICO)

Providers of the trust-wide online systems are gradually building in AI tools. The trust will ensure that all requirements of UK GDPR are met for these systems and a DPIA is undertaken and regularly reviewed appropriately. Any systems that an individual school uses in addition to those provided by the trust will require the same processes at school-level and reported to the DPO.

Our systems are:

| System | Use | AI |
|---|---|---|
| Arbor | Management information system (MIS) | 'Arbor AI' (previously called Ask Arbor) |
| Every HR | HR management system and training | Not currently using AI |
| FFT | Aspire – pupil data analytics | Not currently using AI |
| Perspective (Angel Solutions) | Management and improvement toolkit (School self-evaluation, development planning, appraisal) | Not currently using AI |
| EduKey (Provision Map) | SEND management software | Not currently using AI |
| The Key (including GovernorHub) | Guidance, resources, CPD. Management of governance | KeyGTP – uses resources within TheKey personalised based on the user |

## 6. General use of AI

Employees and volunteers using AI for GST business must only process personal data through an approved system (as in 5, above). Anonymisation techniques should be applied where possible to protect individual's identities.

General use of AI for searching the web and creating content should be through recognised and safe systems. GST uses Microsoft 365 for its IT operations and this is managed by an IT company, Eduthing. Schools on the GST Microsoft tenancy can be assured that there is enterprise-grade security and privacy features to ensure that data is secure, compliant and fully under the control of GST. Pupils and adults should use Microsoft's Copilot having signed into the GST tenancy to ensure compliance.

Any school not yet on the GST Microsoft tenancy (including schools using Google) must ensure that their systems are enterprise-grade and offer the same protection as the GST tenancy.

## 7. Implementation and review

This policy will be reviewed annually or as required to ensure it remains relevant and effective.

The DPO will monitor the use of the trust's systems and review any DPIAs as necessary. Changes will be monitored by the trust's risk and audit committee.

Changes to the way data is used as an impact of using AI will be reflected in the trust's data protection policy and any relevant privacy notices.

## 8. Further resources

DfE policy paper – Generative artificial intelligence (AI) in education

ICO – Guidance on AI and data protection