

Greenshaw Learning Trust

3; Policy

GLT ARTIFICIAL INTELLIGENCE PROCEDURE

Feb 2024

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GLT ARTIFICIAL INTELLIGENCE PROCEDURE

PART A

1.1 Application

Although Data Protection law does not specifically define or discuss the guidelines for Artificial Intelligence (“AI”), the guidance from the Information Commissioner’s Office and the UK government defines it as using non-human systems to imitate human intelligence. This Staff Procedure applies to the Greenshaw Learning Trust as a whole and to all the schools in the Trust and the Trust Shared Service.

The Greenshaw Learning Trust, including all the schools, their Trustees, governors and staff, must abide by this GLT AI Procedure.

This Procedure is subject to the Trust’s Scheme of Delegation for Governance Functions. If there is any ambiguity or conflict then the Scheme of Delegation and any specific alteration or restriction to the Scheme approved by the Board of Trustees takes precedence.

In implementing this procedure and associated policies and procedures the governing body, Headteacher and school staff, and Trust Shared Service staff, must take account of any advice or instruction given to them by the GLT Data Protection Officer, the GLT CEO or Board of Trustees.

If there is any question or doubt about the interpretation or implementation of this Procedure, the GLT CEO should be consulted.

1.2 Approval and review

Maintenance of this Procedure is the responsibility of the GLT CEO.

This Procedure was approved by the Board of Trustees on: 9th February 2024. This Procedure is due for review by: February 2027.

1.3 Terminology

The Trust means the Greenshaw Learning Trust (GLT).

- School means a school within the Greenshaw Learning Trust.
- Headteacher means the headteacher or principal of the school.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Governors and Trustees includes governors, Trustees, non-governor members of Trust Committees and members of the Trust Panel.
- Governing Body means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the school.
- GLT Data Protection Officer means Judicium Consulting Ltd.
- School Data Protection Lead means the point of contact for data protection matters for members of staff, students and parents within the school
- Data Subject means an individual about whom personal information is stored.
- Data Controller means the organisation storing and controlling information regarding data subjects which is Greenshaw Learning Trust.

In this policy references to the Greenshaw Learning Trust will be read as including the Trust Shared Service and all schools in the Greenshaw Learning Trust.

References in this Procedure to a school in the Trust should also be read as the Trust Shared Service for services, functions and members of staff of the Trust that are not contained within a school budget and/or are not the responsibility of a Headteacher and/or Governing Body. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher and Governing Body should be read as the GLT CEO and the Trust Shared Services Committee respectively.

1.4 Responsibilities

It is the responsibility of the governing body and Headteacher of each school, and the Board of Trustees and GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff adhere to this GLT AI Procedure; in implementing this Procedure the governing body, Headteacher and Trust staff must take account of any advice given to them by the GLT Data Protection Officer, GLT CEO and/or Board of Trustees.

For the purposes of data protection legislation the Greenshaw Learning Trust is the Data Controller, and can be contacted by writing to Greenshaw Learning Trust, Grennell Road, Sutton, SM1 3DY.

The GLT Data Protection Officer is: Judicium Consulting Limited

Email: dataservices@judicium.com

Address: 72 Cannon Street, London, EC4N 6AE Telephone:
0203 326 9174

Lead Contact: Craig Stilwell

Each Headteacher will appoint a School Data Protection Lead to be the point of contact for data protection matters for members of staff, students and parents of their school, and to liaise with the GLT Data Protection Officer. The name and contact details must be provided to the GLT Data Protection Officer and will be made available on the school website or by contacting the school.

1.5 Associated policies and procedures

This GLT Artificial Intelligence Procedure is a constituent part of the

- GLT Data Protection Policy
- GLT Cyber Security Policy
- Privacy Notice for Staff
- Privacy Notice - Parents and Carers
- Privacy Notice - Students (13+)
- Privacy Notice - Younger Students

PART B

Introduction

The use of AI is transforming the way individuals are working. Informed and responsible use of AI has the potential to increase efficiency, school educational outcomes and improve decision making.

With these benefits come potential risks, including data protection breaches, the protection of confidential information, ethical considerations, and compliance with wider legal obligations.

We permit the informed and responsible use of authorised AI applications by staff, in carrying out specific and authorised tasks. This procedure must be complied with when using AI to carry out such tasks.

The purpose of this procedure is to set out our rules on the use of AI in the workplace and how it should be adopted by staff to ensure we maximise the benefits of AI while minimising any risks or concerns.

Where personal data is used with AI applications, a data protection impact assessment ('DPIA') must be carried out or updated to ensure transparency in how AI will be used and what mitigating steps have been taken to reduce any potential risk of harm to students, staff and any other data subjects whose data might be shared with the authorised systems.

Pupil usage of AI

As part of this procedure, staff should be aware of how the school permits limited pupil usage of AI applications in accordance with the AI procedure for pupils. It is important to monitor pupil usage whilst in class and for homework to ensure compliance with this policy or how to monitor when reviewing homework.

Reference to AI should be included in an Acceptable Use Statement (model provided) to ensure appropriate usage of AI and pupils should be reminded of the permitted usage along with an outline of what classes as AI misuse.

GLT schools may permit pupil usage of AI in the following circumstances:

- (a) As a research tool
- (b) Idea generation for projects
- (c) Revision aids
- (d) Development of critical thinking skills

Examples of AI misuse include, but are not limited to, the following:

- Copying or paraphrasing sections of AI-generated content so that the work is no longer the pupil's own
- Copying or paraphrasing whole responses of AI-generated content
- Using AI to complete parts of an assessment or homework so that the work does not reflect the pupil's own work, analysis, evaluation or calculations
- Failing to acknowledge use of AI tools when they have been used as a source of information
- Incomplete or poor acknowledgement of AI tools

- Submitting work with intentionally incomplete or misleading references

Before encouraging pupils to access the authorised AI tools, staff should ensure pupils have been taught how to use the software, including online safety, how to raise any concerns and how to ensure that the information generated is reliable and trustworthy.

Authorised AI applications

GLT schools may allow access to the following AI applications for business purposes;

- Chat GPT
- Google Bard
- Bromcom

The listed AI applications may be updated at any time. Should a school wish to use another AI application not listed, they must contact the Head of Pupil Services, by emailing pupilservices@greenshawlearningtrust.co.uk to review permission to do so.

Assessments

To support the Joint Council of Qualifications (JCQ) guidance on the use of AI, any member of staff must investigate any concerns with regard to students' external assessment (non-examination assessments) components and must not accept work which is not the candidate's own.

Staff must teach examination candidates about the risks of using AI, how to acknowledge its use and what constitutes malpractice

Authorised usage of AI for staff

Authorised AI applications must only be used by staff for the following business purposes:

- (a) Drafting internal guidance, training and presentations
- (b) Lesson planning
- (c) Conducting research
- (d) Developing code
- (e) Providing summaries
- (f) Idea generation
- (g) Report writing (no identifiable pupil data to be used)
- (h) Prompt discussions with pupils to help develop their critical thinking skills
- (i) Identifying patterns of data
- (j) Enhance the provision of education
- (k) Provide pupils with more personalised and adaptive learning experiences
- (l) Translation

All other purposes must be authorised in advance by the Head of Pupil Services.

All information and the quality of any resources produced by AI must be checked thoroughly and it is the staff members' professional responsibility to do so prior to using in a live environment, such as a classroom. These resources should be considered a starting point, rather than a finalised version.

Staff are encouraged to share their experience and feedback on the tools, both within school and across GLT to ensure that processes continue to be refined.

Monitoring

We reserve the right to monitor all content on any AI applications used for business purposes. This will only be carried out by the Trust to comply with a legal obligation or for our legitimate business purposes, in order to:

- (a) prevent misuse of the content and protect confidential information (and the confidential information of our students, staff or other stakeholders)
- (b) ensure compliance with our rules, standards of conduct and policies in force
- (c) monitor performance at work
- (d) ensure that staff do not use AI for any unlawful purposes or activities
- (e) comply with legislation for the protection of intellectual property rights
- (f) safeguard our students, staff and other stakeholders