





Lumen Learning Trust

Learning together for a brighter future

AI Policy

DATE APPROVED BY LUMEN LEARNING TRUST	14/07/2025		
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SIGNED EXECUTIVE PRINCIPAL	Mary Ellen McCarthy 	DATE	14/07/2025
SIGNED CHAIR OF DIRECTORS	Jo Roberts 	DATE	14/07/2025

Lumen Learning Trust puts the children's needs at the heart of its provision. Our whole school community is committed to enabling the children to become successful lifelong learners and happy, fulfilled adults who can make positive choices about their future.

1. Aims and scope

Here at Lumen Learning Trust (the 'Trust'), we understand the valuable potential that artificial intelligence (AI), including generative AI, holds for schools. For example, it can be used to enhance pedagogical methods, customise learning experiences and progress educational innovation.

We are also aware of the risks posed by AI, including data protection breaches, copyright issues, ethical complications, safeguarding and compliance with wider legal obligations.

Therefore, the aim of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole trust community.

This policy covers the use of AI tools by staff across the trust, trustees, local governors and pupils. This includes generative chatbots such as ChatGPT, KeyGPT, NotebookLM, Canva and Google Gemini (please note, this list is not exhaustive).

This policy aims to:

- Support the use of AI to enhance teaching and learning;
- Support staff across the trust to explore AI solutions to improve efficiency and reduce workload;
- Prepare staff across the trust, directors, local governors and pupils for a future in which AI technology will be an integral part;
- Prioritise transparency, fairness, and accountability in all AI applications;
- Promote equity in education by using AI to address learning gaps and provide personalised support;
- Ensure that AI technologies are used ethically and responsibly by all staff across the trust, trustees, local governors and pupils;
- Protect the privacy and personal data of all staff across the trust, trustees, local governors and pupils in compliance with the UK GDPR.

1.1. Definitions

Artificial Intelligence (AI): An umbrella term for a range of technologies and approaches that often attempt to mimic human thought to solve complex tasks;

Generative AI: AI that can create original content – such as text, images, video, audio – in response to a user's prompt or request. ChatGPT and Google Gemini are examples of generative AI tools.

Open AI: this is a generative AI tool accessible and modifiable by anyone. It may store, share or learn from the information entered into it, including personal or sensitive information.

Closed AI: this is a generative AI tool which is generally more secure, as external parties cannot access the data you input.

2. Legislation

This policy reflects good practice guidelines / recommendations in the following publications:

- [AI regulation white paper](#), published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence;
- [Generative artificial intelligence \(AI\) and data protection in schools](#), published by the Department for Education (DfE).

This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#);
- [Data Protection Act 2018 \(DPA 2018\)](#).

3. Regulatory principles

As a trust, we follow the 5 principles set out in the [AI regulation white paper](#):

Regulatory Principle	We will:
Safety, security and robustness	<ul style="list-style-type: none"> • Ensure that AI solutions are secure and safe for users and protect users' data • Ensure we can identify and rectify bias or error • Anticipate threats such as hacking
Appropriate transparency and explainability	<ul style="list-style-type: none"> • Be transparent about our use of AI, and make sure we understand the suggestions it makes
Fairness	<ul style="list-style-type: none"> • Only use AI solutions that are ethically appropriate, equitable and free from prejudice – in particular, we will fully consider any bias relating to small groups and protected characteristics before using AI, monitor bias closely and correct problems where appropriate.
Accountability and governance	<ul style="list-style-type: none"> • Ensure that the board of trustees / name of committee of the board of trustees / local governing bodies and staff have clear roles and responsibilities in relation to the monitoring, evaluation, maintenance and use of AI
Contestability and redress	<ul style="list-style-type: none"> • Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology • Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment

4. Roles and responsibilities

4.1. Trust-level AI lead

Our generative AI trust lead is the Deputy Executive Principal. They are responsible for the strategic oversight of AI use across the trust.

4.2. Board of directors

The board of directors will:

- Take overall responsibility for monitoring this policy and holding school leaders to account for its implementation in line with the trust's AI strategy;
- Consider the recommendations of the Trust Central team and approve the AI policy at least annually;
- Ensure school leaders are appropriately supported to make informed decisions regarding effective and ethical use of AI across the trust;
- Ensure risks associated with the implementation of this policy are documented (via the risk register) and controlled appropriately.

Directors will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools (see section 5);
- Seek advice from the data protection officer as appropriate;

- Check whether they are using an open or closed generative AI tool;
- Ensure there is no identifiable information included in what they put into open generative AI tools;
- Acknowledge or reference the use of generative AI in their work;
- Fact-check results to make sure the information is accurate.

4.3. Trust Central Team

The Trust Central Team will:

- Review and update the AI policy as appropriate, and at least annually for consideration by Directors;
- Ensure the policy reflects the values and ethos fo the Trust, is easy to understand and takes into account stakeholder feedback;
- Manage the technical aspects of AI implementation, including data security and system maintenance;
- Sign off on approved uses of AI, or new AI tools, taking into account advice from the data protection officer (DPO).

4.4. School leaders

School leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their school;
- Liaise with the Trust Central Team Data Manager to ensure that the use of AI is in accordance with data protection legislation;
- Ensure that the guidance set out in this policy is followed by all staff;
- Ensure staff are appropriately trained in the effective use and potential risks of AI;
- Ensure pupils are safeguarded adequately, including ensuring they are protected from potentially harmful and inappropriate online material;
- Make sure pupils are taught about the effective use and potential risks of AI.

4.5. Trust data protection officer (DPO)

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

Our DPO is Mr David Coy and is contactable via datamanager@lumenlearningtrust.co.uk.

4.6. Safeguarding leads

Safeguarding leads are responsible for monitoring and advising on our compliance with safeguarding requirements including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI;
- Updating and delivering staff training on AI safeguarding threats;
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE).

4.7. All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives through the use of approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- Seek advice from the DPO and school Headteacher;
- Check whether they are using an open or closed generative AI tool;
- Ensure there is no identifiable information included in content inputted to open generative AI tools;
- Acknowledge or reference the use of generative AI in their work;
- Fact-check results to make sure the information is accurate.

All staff play a role in ensuring that pupils understand the potential benefits and risks of using AI in their learning. Staff must:

- Integrate tools into teaching practice to enhance learning experiences only where it is appropriate to do so;
- Regularly assess the effectiveness of AI tools in supporting pupil progress;
- Guide pupils in critically evaluating AI-generated information and understanding its limitations.

4.8. Pupils

Pupils must:

- Follow the guidelines set out in section 7 of this policy ('Use of AI by pupils')

5. Use of AI by staff across the trust, trustees and local governors

5.1. Use of AI

The Trust is committed to helping staff, directors and local governors reduce their workload. Generative AI tools can make certain written tasks quicker and easier to complete, but cannot replace the judgement and knowledge of a human expert.

The safe and appropriate use of AI tools can be used to:

- Reduce unnecessary workload;
- Free up teachers' and support staff time;
- Produce compliant administrative plans, policies and documents;
- Support the teaching of a knowledge rich curriculum.
- Educate pupils.

Staff producing a document using AI tools for administrative or teaching purposes should be professionally responsible for its accuracy, quality and content. They should not expect the AI output to match the level of a human-designed document that takes into account the school's specific context. Staff members should understand these limitations of AI tools.

All staff must ensure the following when using AI tools:

- Any plans, policies or documents created using AI should be clearly attributed;
- Any member of staff, director or local governor using an AI-generated plan, policy or document should only share the AI-generated content with other members of staff, directors or local governors for use if they are confident of the accuracy of the information, as the content remains the professional responsibility of the person who produced it;
- Only use information if they are qualified to verify its accuracy;
- Always consider whether AI is the right tool to use. Just because the trust has approved its use doesn't mean it will always be appropriate.

Generative AI may present plausible information that is:

- inaccurate;
- inappropriate;
- biased;
- reinforces stereotypes;
- taken out of context and without permission;
- misinformation;
- out of date;
- and unreliable.

Hallucinations occur when AI detects patterns or objects that don't exist, leading to outputs that are incorrect or meaningless.

5.2. How teachers might use AI:

Example	Considerations
Drafting lesson plans	The output may be factually incorrect or lack sound pedagogical foundations. Nonetheless, it may be a useful starting point.
Help with design of quiz questions or other exercises	AI can quickly generate multiple choice quizzes and assessment ideas, but they should be reviewed carefully as it can produce plausible but incorrect information.
Providing feedback to pupils	Generative AI should not be used to mark pupil work.
Customising materials (simplifying language, adjusting to different reading levels, creating tailored activities for different interests)	Generally, when asked to customise material, generative AI won't introduce new concepts, and so is less likely to introduce factually incorrect information.

5.3. How pupils might use AI:

Example	Considerations
To formulate ideas, for example creating essay structures	Generative AI tools are generally effective in producing outlines as a starting point for an assignment.
To provide feedback on writing	Generative AI will proofread and correct text for pupils, in a similar way to grammar tools. It will also provide feedback on style and content. Pupils will need clear advice on when this should be declared.
As a research tool	A good understanding of the tool and its limitations is crucial here, particularly the tendency for generative AI to give misinformation.
Generating images to include in assignments	Image generation tools may come at a cost and pupils need to be aware of copyright concerns.

5.4. How school leaders, and governance staff might use AI:

Example	Considerations
Formulating policies and procedures	The quality and content of the final document remains the professional responsibility of the person who produced it and the organisation they belong to.
Drafting communications to staff, parents and other stakeholders	AI tools can help to plan and structure communications and apply a consistent style and format. However, users should be aware of limitations around inclusive language and ensure content is accessible and suitable for all stakeholders.
Drafting meeting minutes	AI tools can use verbatim transcripts or notes as a source to help produce meeting minutes efficiently. Be aware of the need to maintain confidentiality and discuss the format of minutes with the board.

5.5. Approved AI tools and their uses

The table below sets out the approved AI tools and the approved uses for each tool *[updated 09/10/2025]*.

Approved tools	Type	Approved uses
Canva	Open	<ul style="list-style-type: none"> • Lesson planning • Resource creation • Image generation • Image editing • Modelling AI to pupils
ChatGPT	Open	<ul style="list-style-type: none"> • Image creation • Generate documents • Lesson planning • Resource Creation • Summarise documents and policies • Draft emails • Writing support • Parent engagement and communication • Executive summary reports • Adaptive and inclusive teaching lessons and resources
Diffit	Open	<ul style="list-style-type: none"> • Resource creation
Google Gemini	Closed	<ul style="list-style-type: none"> • Assessment and feedback • Image creation • Generate documents • Lesson planning • Resource creation • Summarise documents and policies • Draft emails • Writing support • Parent engagement and communication • Executive summary reports • Adaptive and inclusive teaching lessons and resources • Upload documents from GSuite/Google
Ideogram	Open	<ul style="list-style-type: none"> • Image creation
KeyGPT	Closed	<ul style="list-style-type: none"> • Create or update policy templates • Letters to parents/carers/staff • Job descriptions and adverts • Interview or survey questions • Summarise issues • Brainstorm ideas • Generate documents
Magma Maths	Closed	<ul style="list-style-type: none"> • Resource creation • Adaptive and inclusive teaching lessons and resources • Marking pupil work • Providing feedback • Progress and attainment tracking
NotebookLM	Closed	<ul style="list-style-type: none"> • Access to policies • Research assistance • Comparing reports
Olex AI	Open	<ul style="list-style-type: none"> • Marking pupil work • Providing feedback • Image creation

TeachmateAI	Open	<ul style="list-style-type: none"> • Generate documents • Lesson planning • Resource creation • Slideshow creator • Adaptive and inclusive teaching lessons and resources
Third Space Learning	Open	<ul style="list-style-type: none"> • Live adaptive and inclusive 1:1 maths tutoring sessions with an AI tutor

5.6. Process for approval

Staff are welcome to suggest new ways of using AI to improve pupil outcomes and reduce workload. They should contact their school Headteacher to discuss any ideas they may have with regards to using AI, so they can take the suggestions forward if they deem it to be a satisfactory new method of working. The staff member must then submit the Lumen Learning Trust new third party supplier register form prior to an AI tool being approved for use.

The Trust Central Team is responsible for signing off on approved uses of AI, or new AI tools, taking into account advice from the Trust DPO.

5.7. Data protection, privacy and the use of personal/sensitive data of staff, pupils or families

To ensure that personal and sensitive data remains secure, personal or sensitive data must not be entered into unauthorised open AI tools. Personal data includes (but is not limited to) name, age, medical/health needs, ethnicity, gender, sex, attendance data, religion, Pupil Premium status, English as a Additional Language status, Free School Meal status and In care status.

If personal and/or sensitive data is entered into an unauthorised generative open AI tool, the Trust will treat this as a data breach and will follow the personal data breach procedure outlined in our data protection policy found here: [LLT Data Protection policies](#). Please also refer to section 10 of this policy.

5.8. Intellectual property

Most generative AI tools use inputs submitted by users to train and refine their models.

Pupils own the intellectual property (IP) rights to original content they create. This is likely to include anything that shows working out or is beyond multiple choice questions.

The Trust will not allow or cause intellectual property, including pupils' work, to be used to train generative AI models without appropriate consent or exemption to copyright.

Exemptions to copyright are limited – we will seek legal advice if we are unsure as to whether we are acting within the law.

5.9. Bias

We are aware that AI tools can perpetuate existing biases, particularly towards special characteristics including sex, race and disability. This means that critical thought must be applied to all outputs of authorised AI applications. This means fact and sense-checking the output before relying on it.

We will ensure we can identify and rectify bias or error by training staff in this area.

We will also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or pupils have any concerns or complaints about potential unfair treatment or other negative outcomes as a consequence of AI use, these will be dealt with through our usual [Concerns & Complaints](#) procedure and first raising their concern with their child's school.

5.10. Raising concerns

The Trust encourage staff to speak to their school leader in the first instance if they have any concerns about the potential use of AI, or the use of AI that may have resulted in errors that lead to adverse consequences or unfair treatment.

5.11. Ethical and responsible use

The Trust will always:

- Use generative AI tools ethically and responsibly
- Remember the principles set out in our trust's [equality policy](#) when using generative AI tools
- Consider whether the tool has real-time internet access, or access to information up to a certain point in time, as this may impact the accuracy of the output
- Fact and sense-check the output before relying on it

Staff members, directors and local governors must not:

- Generate content to impersonate, bully or harass another person
- Generate explicit or offensive content
- Input offensive, discriminatory or inappropriate content as a prompt

6. Educating pupils about AI

The Trust acknowledges that pupils benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society. Strong foundational knowledge will ensure that pupils develop the right skills to make best use of generative AI.

Children will be exposed to the benefits and risks of AI, including limitations, reliability and potential bias.

E-Safety: Protecting Against Harmful or Misleading Content

We ensure that all pupils receive age-appropriate education on:

- Recognising misinformation and fake news, including how AI can manipulate images, videos, and text.
- The importance of privacy, data protection, and responsible online behaviour.
- Identifying and avoiding AI-generated scams, phishing attempts, and deepfakes.
- Understanding digital footprints and the long-term impact of online actions.

This is taught through the E-Safety Curriculum

7. Use of AI by pupils

We recognise the potential of Artificial Intelligence (AI) in enhancing learning experiences for our pupils. We are committed to ensuring that AI is used safely, ethically, and effectively to support children's education, and therefore, children do not have access to AI tools without adult supervision [*updated 15/12/2025*]. Teachers may use approved AI tools to model and provoke discussion.

Our approach ensures that AI is used thoughtfully and purposefully, with clear guidance from teachers, to enhance learning without replacing fundamental skills such as critical thinking, creativity, and problem-solving.

All AI-generated content must be properly attributed and appropriate for the pupils' age and educational needs. Where AI tools have been used as a source of information, staff should be open and transparent about using the AI, however not stating the specific name of the tool.

8. Formal assessments

The Trust will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI in assessments.

We will follow the latest guidance published by the Joint Council for Qualifications (JCQ) on [AI use in assessments](#).

9. Staff training

We recognise the growing impact of AI on education. We are committed to equipping our staff, Directors and Governors with the knowledge and skills needed to integrate AI effectively and ethically into teaching and learning and within their roles.

Our approach is built on three key principles: understanding, professional development, and collaboration.

Understanding

Ensuring a good understanding of AI so that all staff have a clear and confident understanding of AI, we will:

- Provide regular training sessions on the fundamentals of AI, its applications in education, and ethical considerations.
- Include this in the Induction programme for anyone new to the Trust.
- Develop guidance documents showcasing how AI can enhance teaching, assessment, and workload reduction.
- Encourage self-directed learning through access to high-quality online courses and reading materials.
- Offer hands-on workshops where staff can explore AI tools relevant to their roles, ensuring practical application in classrooms.

Professional

CPD opportunities and responsibility for AI development to ensure that AI professional development is ongoing and embedded into our Trust-wide CPD strategy:

- AI learning will be integrated into existing CPD frameworks, ensuring that AI is not seen as an 'add-on' but a tool to support effective teaching and leadership.
- Dedicated AI Champions within each school will act as contact points for sharing best practices and supporting colleagues in implementation.
- Staff will have access to external CPD opportunities, including courses from educational technology providers, research organisations, and national AI in education networks.

Collaboration

Staying abreast of good practice and sharing knowledge to ensure we remain at the forefront of AI advancements in education, we will:

- Engage with national and international research bodies, including the Education Endowment Foundation (EEF) and AI in Education networks.
- Participate in cross-school collaboration, enabling staff to share successes and challenges in AI adoption.
- Host AI innovation meetings, where staff can showcase how AI is enhancing teaching, learning, and efficiency within our schools.
- Encourage peer coaching and lesson observations, ensuring best practice is embedded across all classrooms.

By embedding AI awareness and CPD into our Trust-wide strategy, we aim to empower our staff with the tools and confidence to use AI effectively, ultimately enhancing teaching, learning, and school operations across the Primary Learning Trust.

10. Sustainability and Environmental Impact of AI systems

As part of the government's [Sustainability leadership and climate action plans in education](#), we are working towards ensuring that a climate action plan is in place, and that the work of our schools is coordinated centrally under a single umbrella.

Our Trust recognises:

- that our use of AI, in particular the large language models described in this policy, has a significant impact on both energy consumption and carbon footprint - even if the cost to our Trust is free/negligible
- Costs associated with the training and running of the AI tools themselves, the need for the associated hardware and software also has an impact.
- the potential use of mitigation strategies such as the development of smaller, less energy intensive models.
- the potential introduction of regulation will also need to be considered as part of our Trust's strategy.

This impact will form part of our thinking around the deployment and use of AI.

11. Breach of this policy

11.1. By staff

Breach of this policy by staff will be dealt with in line with the Trust's staff code of conduct. Where disciplinary action is appropriate, it may be taken whether the breach occurs:

- During or outside of working hours;
- On an individual's own device or a school device;
- At home, at school or from a remote working location.

Staff members will be required to co-operate with any investigation into a suspected breach of this policy. This may involve providing the trust with access to:

- The generative AI application in question (whether or not it is one authorised by the trust);
- Any relevant passwords or login details.

You must report any breach of this policy, either by you or by another member of staff, to your senior leader immediately.

11.2. By governance staff

Governance staff found in breach of this policy will follow the procedures set out in the Governor Code of Conduct.

11.3. By pupils

Any breach of this policy by a pupil will be dealt with in line with the applicable school's behaviour management policy which can be found via School Info>Policies on the school website.

11. Monitoring and transparency

AI technology, and the benefits, risks and harms related to it, evolves and changes rapidly. Consequently, this policy is a live document that must be kept updated by the Trust Central team whenever there is a significant change to either AI use by the trust or the associated risks of AI usage.

This policy will also be regularly reviewed and updated to align with emerging best practices, technological advancements and changes in regulations.

The policy will be shared with the board of directors at least annually.

All teaching staff are expected to read and follow this policy. The school Headteacher is responsible for ensuring that the policy is followed.

The Trust AI Champion will monitor the effectiveness of AI usage across the trust.

We will ensure we keep members of the trust community up to date on the use of AI technologies for educational purposes. As part of our regular surveys, feedback from pupils, parents/carers and staff will be considered in the ongoing evaluation and development of AI use across the schools in our trust.

12. Links with other policies

This AI policy is linked to our:

- Data protection policy
- Behaviour Management policy
- Staff code of conduct
- ICT acceptable use policy
- E-safety policy
- Equality policy
- Breach Management policy
- Safeguarding and Child Protection policy

