

POLICY – Artificial Intelligence (AI)

Education Universal

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Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
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Staff groups affected	Education

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.



Andrew Sutherland
Representative, Proprietor- Cambian Group
September 2026



Tom Clarke
Headteacher
September 2026

Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
‘Establishment’ or ‘Site’	A generic term referring to the school/college owned by CareTech.
Learner	Any child or young person under the age of 18, or young adult over 18 who receives education.
Service Head	The senior person with overall responsibility for the school/college.
Tutor/Teacher	Members of staff who have teaching responsibility for learners at the school/college.
Parent/Carer	Parent or person with parental responsibility.
Regulatory Authority	The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the establishment’s location.
Staff	All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

1. Local School/College Profile

Cambian Hereford School is an SEMH school with a capacity for 16 pupils aged 11-16. The majority of pupils on roll have EHCPs although this is not a requirement for attending Cambian Hereford School. Learners at the Cambian Hereford School have a range of educational backgrounds and often have disrupted educational experiences, additional needs such as ADHD as well as a range of needs around attachment difficulties and trauma. The school looks to help reintegrate learners into a bespoke curriculum pathway to support both their educational and wider social and emotional needs.

Cambian Hereford School Vision Statement

Engage, Achieve, Grow.

At the Cambian Hereford School we work together to provide a safe, supportive, inclusive environment where pupils can engage, achieve and grow in their academic, social, emotional and personal journeys. We work to provide bespoke learning routes for all young people from their individual starting points through innovative and specialised curriculums to allow all pupils to achieve. We aim to create personal pathways for each pupil to grow towards a positive post 16 transition with confidence, independence and self-worth to empower our pupils to build their own futures.

2. Purpose

This policy applies to the Cambian Hereford School and sets out the organisational standards for the safe, legal and responsible operation of Artificial Intelligence (AI).

It provides a universal framework and outlines the expectations that apply to:

- Staff
- Senior leaders
- Learners
- Visitors and contractors (where relevant)

This policy enables the Cambian Hereford School to meet statutory duties, uphold safeguarding responsibilities, comply with data protection requirements, and maintain high-quality provision.

3. Scope (Universal Application)

This organisational policy applies across all education sites, services and functions. It establishes the universal standards and expectations that must be followed consistently throughout the organisation.

Each site implements these standards in accordance with the statutory and regulatory requirements of the nation in which it operates as set out in **Appendix A-C**.

4. Local Adaptation Requirement (*Adapt Locally*)

Some sections in this policy are marked **Adapt Locally**. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).^{**}

Where England-specific statutory references appear in the universal policy, sites in Wales and Scotland insert their own national equivalents into the marked **Adapt Locally** sections.

All local additions must be:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

5. Legal and Regulatory Context (Universal)

The Cambian Hereford School is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendices A–C**, which summarise the legal, regulatory and inspection requirements for England, Wales and Scotland.

6. Aims

At school/college we understand the valuable potential that artificial intelligence (AI), including generative AI. 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 school community.

This policy covers the use of AI tools by school staff, senior leaders and pupils. This includes generative chatbots such as ChatGPT 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 to explore AI solutions to improve efficiency and reduce workload



- Prepare staff, senior leaders and learners for a future in which AI technology will be an integral part
- 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, senior leaders and learners
- Protect the privacy and personal data of staff, learners and wider school community in compliance with the UK GDPR

7. Roles and Responsibilities

7.1 Regional Lead

- Delegates responsibility for monitoring the achievement of the objectives to the Headteacher/Principal in compliance with safeguarding protocol.

7.2 Headteacher

- Promotes knowledge and understanding of the use of AI technology amongst staff and pupils.
- Monitors success in achieving the objectives and reports back to the Regional Lead.
- Ensures that the AI information and objectives as set out in this statement are published and communicated throughout the school/college, including to staff, pupils, carers and parents, and that they are reviewed and updated at least once every two years.

7.3 Staff

- All school/college staff are expected to have access to, understand and work to achieve the objectives as set out in the policy.

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

- Use only approved AI tools (approved by Cambian Group, such as the Key GPT)
- Seek advice from the Data Protection Officer, as appropriate
- Report safeguarding concerns to the DSL/DDSL in line with our child protection and safeguarding policy
- 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

All staff play a role in ensuring that learners understand the potential benefits and risks of using AI in their learning. All staff have a responsibility to guide learners in critically evaluating AI-generated information and understanding its limitations.

7.4 Data Protection Officer

- Our DPO is contactable via data.protection@caretech-uk.com

7.5 Senior Information Risk Officer

- The company has also appointed a Senior Information Risk Officer, Russell Edge. Report any suspicious activity to Russell.Edge@caretech-uk.com

8. Principles for the Use of AI

We follow the 5 principles set out in the AI Regulation White Paper (Department for Science, Innovation and Technology)

- Safety, security and robustness
- Appropriate transparency and explainability
- Fairness
- Accountability and governance
- Contestability and redress

9. Eliminating Discrimination

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

We will ensure we can identify and rectify bias or error by training staff in this area. We also regularly review our use of AI to identify and correct any biases that may arise.

If parents/carers or learners 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 complaints' procedure.

Staff and learners 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

Safeguarding concerns arising from the use of generative AI must be reported immediately to the DSL/DDSL in accordance with our child protection and safeguarding policy.

10. Educating Learners About AI

Here at school/college we acknowledge that learners benefit from a knowledge-rich curriculum that allows them to become well-informed users of technology and understand its impact on society.

Within ICT lessons and other subjects, learners learn about:

- Creating and using digital content safely and responsibly
- The limitations, reliability and potential bias of generative AI
- How information on the internet is organised and ranked

- Online safety to protect against harmful or misleading content

Learners may use AI tools:

- As a research tool
- When studying AI in curriculum subjects

AI may also lend itself to cheating and plagiarism. To mitigate this, learners may not use AI tools:

- During assessments
- To write homework or class assignments
- To complete homework where AI answers are presented as their own work
- During exams

Where AI tools have been used as a source of information, learners should reference:

- The AI tool used
- The date the content was generated

11. Formal Assessments

We 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)

12. Staff Training

Staff will be kept up to date with developments in AI and will be able to develop and improve their practice through CPD opportunities and staff training when appropriate.

Training includes:

- Safe internet use and online safeguarding
- Understanding AI use in education
- Good practice in AI-supported teaching and learning

13. Breach of Policy

Breaches of this policy by staff will be dealt with in line with our staff code of conduct. Disciplinary action may be taken whether the breach occurs:

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

Staff must cooperate with any investigation into a suspected breach of this policy. This may involve providing access to:

- The generative AI application in question
- Relevant passwords or login details

Breaches must be reported immediately to the Headteacher.

14. Links to Other Policies

This policy links to:

- Data Protection Policy
- Safeguarding/Child Protection Policy
- Assessment Policy
- Exams Policy
- Homework Policy
- Behaviour Policy
- Staff Code of Conduct
- Marking and Feedback Policy
- ICT Acceptable Use Policy
- Online Safety Policy
- Equality Policy
- Group Artificial Intelligence Policy

Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance.

Appendices

Appendix A – Legal and Regulatory Framework in England

Appendix B – Legal and Regulatory Framework in Wales

Appendix C – Legal and Regulatory Framework in Scotland



Policies

Appendix A — England

England's legal framework for AI use is driven by statutory duties and Ofsted's inspection requirements.

1. Department for Education — Generative AI in Education

What this means:

- AI can be used in schools and colleges to support teaching, learning and workload reduction if used safely, ethically and with strong data-protection controls.
- AI use must protect intellectual property, minimise risks (bias, accuracy issues), and avoid entering personal/sensitive data into public tools.

What this requires:

- Providers must follow DfE support materials, ensure staff understand safe use, and address risks before adoption. [\[roadmap-fo...ign.gov.uk\]](#)
- **Link:** [Generative Artificial Intelligence \(AI\) in Education — GOV.UK \[gov.uk\]](#)
<https://www.gov.uk/government/publications/safe-use-of-generative-ai-in-education-module-3>

2. Ofsted — How AI is Considered During Inspection

What this means:

- Inspectors do not judge a school or college for using or not using AI. They assess impact, not tools.
- AI must not compromise safeguarding, curriculum integrity, fairness, or the quality of education.

What this requires:

- If AI is used, leaders must show risk management, human oversight, and compliance with data-protection rules.
- **Link:** [How Ofsted looks at AI during inspection and regulation — GOV.UK \[gov.uk\]](#)

3. UK GDPR & Data Protection Act 2018 — ICO Guidance on AI and Data Protection

What this means:

- AI systems processing any personal data must meet GDPR principles (lawfulness, fairness, transparency, minimisation, security).
- Lawful basis and separate purposes must be identified for AI training vs operational use.
- Under the ICO's updated guidance, sites must demonstrate consideration of less-risky alternatives, document mitigations for algorithmic bias, and provide meaningful human review for any automated decisions significantly affecting individuals." (ICO guidance: fairness, transparency, DPIA expansion)

What this requires:

- Complete DPIAs for high-risk AI (most learner-related uses).
- Ensure explainability and human review where decisions affect individuals
- **Link:** [ICO Guidance on AI and Data Protection \[ico.org.uk\]](https://ico.org.uk)

4. Equality Act 2010 — Reasonable Adjustments (AI Use)

What this means:

- AI systems must not disadvantage disabled learners; adjustments must be anticipatory and accessible.

What this requires:

- Adapt AI outputs (formats, readability, accessibility).
- Assess and mitigate any discriminatory bias in AI processes.
- **Link:** [Reasonable Adjustments for Disabled Pupils — Equality and Human Rights Commission \[equalityhu...rights.com\]](https://equalityhumanrights.com)

5. FE & Skills — Jisc Principles for AI in FE

What this means:

- FE providers should adopt AI safely, ethically and strategically, building staff and learner capability.

What this requires:

- Use Jisc's national principles, maturity toolkit, and assessment guidance to plan staged adoption.
- **Link:** [Jisc – Principles for the Use of AI in FE Colleges \[jisc.ac.uk\]](https://jisc.ac.uk)

6. Safeguarding (KCSIE & DfE AI Safety Guidance)

What this means:

- AI use must follow statutory safeguarding duties under *Keeping Children Safe in Education 2025 (KCSIE)*, including risks from harmful/biased content, misinformation, exploitation, profile-building and data misuse.
- DfE's AI safety modules state that AI must only be used where risks are understood and mitigated, and always aligned with KCSIE.

What this requires:

- Build AI-related risks into safeguarding and online safety policies.
- Train staff using DfE's *Safe use of generative AI in education* materials.
- Maintain human oversight, filtering/monitoring, and clear reporting processes.

Active links:

Keeping Children Safe in Education (KCSIE) 2025
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
Safe Use of Generative AI in Education – DfE Module 3
<https://www.gov.uk/government/publications/safe-use-of-generative-ai-in-education-module-3>

Appendix B — Wales

Wales's legal framework for AI use in education is driven by statutory duties and Estyn's inspection requirements.

1. Hwb / Welsh Government — Generative AI in Education

What this means:

- AI use in schools must be purposeful, safe, ethical, lawful, and aligned with Curriculum for Wales values.

What this requires:

- Staff must understand opportunities and risks; leaders must ensure responsible use and prepare learners for AI-enabled futures.
- **Link:** [Generative Artificial Intelligence in Education — Hwb \[hwb.gov.wales\]](#)

2. Hwb — Safeguarding and Online Safety: Generative AI

What this means:

- AI introduces safeguarding risks (misinformation, chatbots, data exploitation, inappropriate content). These must be integrated into safeguarding policy.

What this requires:

- Clear reporting protocols, staff awareness, risk assessment, and consideration of learner's exposure to AI tools.
- **Link:** [Generative AI: Keeping Learners Safe Online — Hwb \[hwb.gov.wales\]](#)

3. Estyn — AI in Teaching, Learning and Leadership

What this means:

- Schools/Colleges are at early stages; AI offers workload benefits but requires strong pedagogy and leadership oversight.
- Estyn calls for a coherent national approach, structured professional learning, and strong leadership to ensure ethical, equitable and safe use of AI

What this requires:

- Leaders must plan AI adoption strategically, ensuring inclusion, progression, and safe practice.
- **Link:** [Estyn Thematic Report: A New Era — AI in Teaching & Learning \[estyn.gov.wales\]](#)

4. UK GDPR / Data Protection Act 2018 (ICO Guidance)

What this means:

- AI tools used with learners require GDPR compliance, DPIAs, transparency, lawful basis identification and human oversight.

What this requires:

- Schools/settings should treat AI uses involving children as high-risk and apply strict data-minimisation and security controls.
- Under the ICO's updated guidance, sites must demonstrate consideration of less-risky alternatives, document mitigations for algorithmic bias, and provide meaningful human review for any automated decisions significantly affecting individuals." (ICO guidance: fairness, transparency, DPIA expansion)
- **Link:** [ICO Guidance on AI and Data Protection \[ico.org.uk\]](https://ico.org.uk)

5. The Equality Act 2010 (Disabled School Pupils) (Wales) Regulations 2021

What this means:

- AI tools must not create barriers for disabled learners and must be adapted to meet needs.

What this requires:

- Accessible outputs, alternative formats, testing for discriminatory impacts, and provision of auxiliary aids.
- **Link:** <https://www.gov.wales/reasonable-adjustments-general-qualifications-guidance-html>
<https://www.gov.wales/guidance-equality-act-2010-disabled-school-pupils-wales-regulations-2021-html>

6. FE & Skills — Jisc Principles for AI in FE

What this means:

- FE providers should adopt AI safely, ethically and strategically, building staff and learner capability.

What this requires:

- Use Jisc's national principles, maturity toolkit, and assessment guidance to plan staged adoption.
- **Link:** [Jisc – Principles for the Use of AI in FE Colleges \[jisc.ac.uk\]](https://jisc.ac.uk)

Appendix C — Scotland

Scotland's legal framework for AI use in education is driven by statutory duties and HMIE inspection requirements.

1. Education Scotland — Teaching and Learning with AI

What this means:

- AI can support personalisation, tutoring, admin reduction, and creative work, but raises risks (plagiarism, IP, confidentiality).

What this requires:

- Clear acceptable-use rules; protection of learner data; checks for accuracy and bias.
- **Link:** [Teaching and Learning with Artificial Intelligence — Education Scotland \[education.gov.scot\]](https://www.education.gov.scot/teaching-and-learning-with-artificial-intelligence)

2. Scotland's National AI Strategy — Trustworthy, Ethical, Inclusive

What this means:

- AI in Scotland must follow national principles of trustworthiness, ethics, inclusion, and child/learner-centred design.

What this requires:

- Education providers should align AI practices with national values, including transparency, bias mitigation, and public trust.
- **Link:** [Scotland's AI Strategy — Scottish Government \[gov.scot\]](https://www.gov.scot/publications/scotland-ai-strategy/pages/introduction/)

3. HMIE — Inspection Expectations

What this means:

- Inspection focuses on how AI use supports CfE principles (progression, formative assessment, equity), not the technology itself.
- AI must enhance, not replace, professional judgement.

What this requires:

- Providers must evidence safe, equitable, pedagogically sound use of AI.
- **Link:** [Education Scotland — Inspection & Review \[education.gov.scot\]](https://www.education.gov.scot/inspection-and-review/)

4. UK GDPR / Data Protection Act 2018 (ICO)

What this means:

- AI processing of learner data requires lawful basis, DPIAs, minimisation, transparency, and oversight.
- Under the ICO's updated guidance, sites must demonstrate consideration of less-risky alternatives, document mitigations for algorithmic bias, and provide meaningful human review for any automated decisions significantly affecting individuals." (ICO guidance: fairness, transparency, DPIA expansion)

What this requires:

- Clear separation of AI development vs deployment purposes; privacy notices; explainability routes.
- **Link:** [ICO Guidance on AI and Data Protection \[ico.org.uk\]](https://ico.org.uk)

5. Equality Act 2010 — Education Scotland (schools obligations)

What this means:

- AI use must not create inequity or disadvantage for disabled learners and must support inclusive practice.

What this requires:

- Provide reasonable adjustments, accessible AI outputs, and evaluate AI bias impacts
- **Link:** <https://education.gov.scot/resources/equality-act-2010/>

6. Safeguarding — National Child Protection Guidance & Education Scotland

What this means:

- AI use must align with Scotland's national child protection framework and multi-agency responsibilities.
- Education Scotland identifies online risks—exploitation, harmful/sexual content, image misuse, misinformation—that apply equally to AI-enabled tools.

What this requires:

- Include AI-related online harms in safeguarding/child protection and digital safety policies.
- Ensure staff understand escalation routes under local child protection procedures.
- Maintain human oversight of AI outputs used with learners.
- Staff must follow Scotland-specific guidance on AI-generated child sexual abuse material, ensuring urgent reporting and legal handling, as AI-CSAM is illegal regardless of photorealism.
- **Link: National Guidance for Child Protection in Scotland (2021, updated 2023)** <https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/documents/> **Safeguarding & Child Protection — Education Scotland** <https://education.gov.scot/resources/safeguarding-and-child-protection/>