



Slough and East Berkshire
C of E Multi Academy Trust

Generative AI Policy

Owner:	Chris Spencer
Ratified by:	SEBMAT Directors: V Mehta
Date Ratified:	July 2026
Date Policy to be reviewed:	July 2027

SEBMAT Generative AI Use Policy

Introduction and scope

Ambition for generative AI use

SEBMAT recognises the potential of generative AI to enhance staff capability, improve student outcomes, and support our wider community. We aim to use generative AI safely and responsibly, with safeguarding and data protection as paramount considerations.

Our focus is on using AI to improve pupil outcomes, reduce staff workload, improve productivity, and enable staff to spend more time on high-value activities that directly benefit teaching and learning outcomes. We will support students to use generative AI in an age-appropriate way, helping them develop the knowledge and skills they need for the future.

We are committed to promoting inclusion and equality in our use of AI technologies. While safeguarding and data protection are central, we want to enable staff to innovate and explore AI tools in a safe, measured, and ethical way. All use of generative AI must align with our expectations around data protection, ethical practice, and appropriate permissions.

Objective of the policy

The objective of this policy is to facilitate the safe and responsible use of generative AI across SEBMAT, providing clear guidance on how these tools can be used appropriately within the Trust.

Scope of the policy

This policy applies to all individuals working within or on behalf of SEBMAT, including staff, governors, directors, and contractors. It covers the use of web-based generative AI tools (such as ChatGPT, Microsoft Copilot, or Google Gemini) where these tools are used in connection with SEBMAT work or involve SEBMAT data. Any individual using SEBMAT data, systems, or information in conjunction with generative AI tools is expected to adhere to this policy.

Out of scope

This document does not cover the policy for bespoke AI (generative or non-generative) solutions being developed or procured. This will be managed separately in line with best practice guidance such as ISO 42001 and the Government AI Management Essentials Tool.

If there is a particular AI tool that staff wish to purchase or implement, they should speak to the Director of IT in the first instance, who can provide further guidance.

Data security

Staff can freely use generative AI tools approved by SEBMAT for use with school data, including Microsoft Copilot, Canva and KeyGPT on Governor Hub when using their work accounts. As the Trust pays for access to these tools, they may be used with sensitive, confidential, or personally identifiable information, in line with data protection requirements.

Staff must be acutely aware of data protection rules at all times. Other well-known generative AI tools (such as ChatGPT, Google Gemini or NotebookLM) may be used with caution, but must only be used with non-sensitive data. Staff must not input sensitive, confidential, or personally identifiable information, including SEBMAT intellectual property or stakeholder data, into these tools.

If staff wish to purchase or use a generative AI tool outside of Microsoft Copilot, Canva or Governor Hub with sensitive data, they must first speak to the Director of IT. The Director of IT should then

discuss this with the respective Headteacher and the Trust's Safeguarding Lead. Depending on the level of risk and impact, this may be escalated to the Trust's executive team for further consideration.

SEBMAT will ensure that any approved tools for use with sensitive data meet appropriate security standards. This may include completing a data protection impact assessment (DPIA) where required.

Wearable Technology

The use of any technology(including wearable devices) for the purpose of recording audio, capturing images, accessing the internet or transmitting data must not be used in a way that compromise safeguarding, privacy, or the security of the school system, and is restricted on school premises. You must ensure such devices are switched off, disabled, or stored away during lessons, meetings, or any activity unless explicitly authorised by the headteacher for a specific educational or operational purpose. The school reserves the right to request that such devices are removed or stored safely if they pose a safeguarding or data -security risk.

Limitations and risks

SEBMAT recognises that genuine mistakes may occur. We are committed to fostering a culture where staff feel supported to report issues promptly, so that appropriate action can be taken and lessons can be learned.

If a member of staff becomes aware of, or is involved in, a data breach or safeguarding concern related to the use of generative AI, they must follow SEBMAT's existing data protection and safeguarding procedures. Staff should inform their line manager immediately. If staff are concerned about any use of generative AI tools that may pose a safeguarding risk, they must report this immediately in line with safeguarding procedures.

Generative AI tools must not be relied on to provide financial, legal, or medical advice.

2. Principles for using generative AI

Principles statement

AI technologies are developing at a rapid pace. These principles exist to guide staff when using generative AI tools, and therefore ensure safe and responsible use. Staff must follow existing legal provisions, guidelines and policies.

Principle 1: Be transparent

Generative AI will never be used as a decision-making tool within SEBMAT.

SEBMAT is committed to being transparent about how generative AI is used across the Trust, in line with our ambition to use these tools safely, responsibly, and to improve outcomes for staff and students. Staff are encouraged to be transparent about how and when generative AI tools are used, and will be expected to disclose their use of generative AI when asked. Leaders will support a culture of openness by maintaining appropriate oversight and encouraging professional dialogue about how generative AI is being used across the Trust.

We will publish this policy on the SEBMAT website. In addition, a summary statement outlining our approach to generative AI will be shared on individual school websites and the Trust's website. Where appropriate, the school will use the [AI Assessment Scale](#) to support consistent disclosure.

Transcription tools

Only Microsoft Copilot should be used for AI-enabled meeting transcription or note-taking tools. No other tools should be used for this purpose. SEBMAT will reserve the right to keep other relevant AI enabled tools under review – ensuring full DPIA before approval.

Permission must be sought from all attendees before recording and staff are empowered to decline recording/transcription. All AI-generated meeting outputs (including transcripts, summaries, or notes) must be reviewed by a human to ensure accuracy, particularly where meetings involve discussion that may inform decisions.

Staff should be aware that recording may continue after some participants have left a meeting. Particular care must be taken when discussing sensitive or confidential information.

Principle 2: Protect data privacy and security

Use of generative AI tools protects personal, confidential, and sensitive information, in line with data protection legislation and safeguarding responsibilities. All use of generative AI must align with existing SEBMAT policies on data protection, safeguarding, and information security.

As outlined above, staff can freely use generative AI tools approved by SEBMAT for use with school data, including Microsoft Copilot, Canva and KeyGPT on Governor Hub when using their work accounts. As the Trust pays for access to these tools, they may be used with sensitive, confidential, or personally identifiable information, in line with data protection requirements.

Staff must be acutely aware of data protection rules at all times. Other well-known generative AI tools (such as ChatGPT, Google Gemini or NotebookLM) may be used with caution, but must only be used with non-sensitive data. Staff must not input sensitive, confidential, or personally identifiable information, including SEBMAT intellectual property or stakeholder data, into these tools.

Generative AI tools used with sensitive data, including pupil information, are approved and meet appropriate security and data protection standards. We also recognise that other tools may be used for lower-risk purposes, such as creativity and idea generation, where no sensitive data is involved.

Principle 3: Maintain human oversight

Staff must treat generative AI tools as collaborators, not decision makers. Where appropriate, tasks should be broken down into smaller steps, with staff guiding the AI tool incrementally. This approach supports greater control, higher quality outputs, and the effective application of professional judgement to identify and address inaccuracies, bias, or other risks.

Evaluating appropriate use

Staff should consider whether generative AI is appropriate for the task they are undertaking, recognising that some uses carry greater risk and require increased caution and professional judgement.

Lower risk uses may include:

- Working on a subject you know well
- Creating lesson plans, quizzes, or teaching resources
- Generating ideas or first drafts of content
- Changing the style, format, or tone of existing material
- Summarising or shortening text

Higher risk uses include:

- Working on a subject you know less about
- Supporting any form of decision-making
- Working with accurate facts, statistics, or data
- Working with safeguarding or pupil information
- Using or handling any personally identifiable information
- Delegating whole tasks to generative AI tools without human oversight
- Translating text into other languages may be more inaccurate with less common languages and staff are unable to verify outputs.

Staff should apply additional scrutiny when using generative AI for higher-risk tasks and ensure that all outputs are carefully reviewed.

Principle 4: Be accountable

Staff remain accountable for the outputs they produce (for example content or resources), whether or not they are using generative AI tools. AI tools can be inaccurate, so staff are expected to check outputs for accuracy, potential bias, explainability and other risks.

Staff must not use generative AI tools to seek or generate professional advice (e.g. legal, medical etc). There is specific guidance that those involved with exam classes must follow with respect to the use of AI in assessments - [The JCQ AI Use in Assessments: Your role in protecting the integrity of qualifications](#). JCQ keep this guidance up to date and it is the responsibility of individual teachers to ensure their practice is in line with this guidance.

Principle 5: Ensure ethical and fair use

All use of generative AI must align with existing SEBMAT policies and values, including equality objectives.

Staff must ensure their use of generative AI aligns with SEBMAT's commitment to fairness, inclusion, and the prevention of harm. Staff should actively consider the risk of bias, discrimination, or misinformation in AI-generated outputs, and take responsibility for ensuring that content is inclusive and appropriate. Staff must not use generative AI tools in any way that could mislead others or cause harm to individuals or groups.

AI-generated images

Staff are permitted to use generative AI tools to create images. However, staff should be mindful of the increased energy consumption associated with image generation and consider whether existing stock images or other resources may be more appropriate.

All use of AI-generated images must be responsible, safe, and appropriate. Staff should model good practice for pupils when using these tools.

If pupil artwork is used, this must only occur within the enterprise environment (i.e. Microsoft Copilot and Canva). This is because any work created by pupils remains their intellectual property. Staff, students and contractors must not manipulate or generate images of members of the school community.

Environmental impact

Staff should be mindful of the environmental impact associated with the use of generative AI tools, particularly those that require significant computing power such as image generation.

Generative AI can offer benefits in improving efficiency and supporting innovation; however, it also consumes energy. Staff are encouraged to use these tools where they add clear value and to consider lower-impact alternatives where appropriate.

This approach supports SEBMAT's wider sustainability commitments and action plans.

Principle 6: Stay informed and monitor use and impact

SEBMAT will take an active approach to staying informed about developments in generative AI and how these align with our policy and practice. SEBMAT will monitor the use and impact of generative AI tools to support ongoing learning and improvement.

We will periodically review usage data (for example through IT systems) to understand levels of uptake across staff and identify trends.

Headteachers are encouraged to facilitate professional conversations within their schools about the use of generative AI, including monitoring its impact on workload, teaching and learning, and staff confidence. This may include the use of staff surveys or other feedback mechanisms.

Insights from this monitoring will be used to inform future guidance, training, and updates to this policy.

A pilot working group will be established to explore the use of generative AI across the Trust, share insights, and help shape future direction. Training for staff will be provided periodically, informed by insights gathered through monitoring and evaluation of AI use. Staff are encouraged to stay up to date with developments in generative AI and to share their experiences and learning with colleagues to support collective understanding and good practice.

3. Policy governance and review

Policy review and updates

This policy will be reviewed on an annual basis to ensure it remains accurate, relevant, and aligned with SEBMAT's priorities and statutory requirements.

Policy owner and contact

The policy owner is CEO of the Trust. This individual will act as the main point of contact for any queries relating to this policy and will be responsible for overseeing its implementation and review.

Reporting incidents

If a member of staff has a concern or becomes aware of an incident related to the use of generative AI, they must report this through SEBMAT's data protection or safeguarding processes, depending on the nature of the issue.

Staff should use their professional judgement in determining whether the concern relates to data protection or safeguarding. In all cases, the first point of contact should be the Headteacher or in respect of the Trust Central Staff the CEO, who can provide guidance and escalate the issue where necessary.

Links to related policies

This policy should be read alongside other relevant SEBMAT policies and guidance, including:

- Safeguarding and child protection policy

- Data protection / GDPR policy
- IT acceptable use policy
- Cyber security policy

Annex A: Definitions

AI-generated content - Any content created fully or partially by AI tools.

Approved tools - AI tools authorised by SEBMAT for use with school data - Microsoft Copilot and Canva.

DPIA (data protection impact assessment) - A process to assess and reduce data protection risks.

Generative AI - A type of artificial intelligence that can create new content such as text, images, audio, or code based on prompts provided by a user.

Generative AI tools - Applications that use AI to produce content (e.g. Copilot, ChatGPT, Gemini, Canva).

Large language models (LLMs) - A type of generative AI trained on large amounts of text data to understand and generate human-like language.

SEBMAT intellectual property - refers to work created by students or staff, such as essays, artwork, lesson materials, and resources etc, and which is protected by copyright and cannot be used, shared, or reproduced without appropriate permission.

Personally identifiable information - Any data that can identify an individual, directly or indirectly.

Safeguarding information - Information relating to the safety and wellbeing of a child or vulnerable individual.

Sensitive data - Confidential information including pupil data, safeguarding information, and identifiable records.

SEBMAT Generative AI Use – Summary for Contractors

This document provides key principles for those using SEBMAT facilities. If contractors are using SEBMAT data in any form, they must adhere to the full SEBMAT Generative AI Use Policy.

Key principles

Safe and responsible use

Generative AI should be used in a safe, responsible, and professional manner. It should support work, not replace professional judgement.

Human oversight

AI tools must be treated as assistants, not decision-makers. Those using SEBMAT facilities are expected to maintain control of outputs and apply professional judgement to check for accuracy, bias, and appropriateness.

Accountability

Those using SEBMAT facilities remain accountable for all outputs they produce, regardless of whether generative AI tools are used. All outputs must be reviewed and verified before use.

Ethical and fair use

Use of generative AI must align with SEBMAT's commitment to safeguarding, inclusion, and the prevention of harm. Those using SEBMAT facilities should actively consider bias, discrimination, or misinformation in AI outputs and ensure content is appropriate.

AI-generated content and images

Any use of AI-generated content must be appropriate and responsible. Those using SEBMAT facilities should be mindful of intellectual property, including that pupil work remains their property, and of the environmental impact of AI tools, particularly image generation.