Transform Trust

Generative Artificial Intelligence Tools usage September 2026

Policy Number	Author	Publication Date	Review Cycle
012	Director of Facilities	V2 September 2026	Annual

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Purpose

This Generative Artificial Intelligence (GenAI) Tools Usage Policy sets out the expectations and requirements when using third party open-source tools such as ChatGPT or Google's Bard or hosted GenAI models e.g. those hosted in Microsoft Azure, Google or AWS to ensure responsible, legal, and ethical use while maximizing their benefits.

GenAI Tools can play a supporting role, and can augment and support your tasks, but your engagement and oversight of the input and output, and compliance with this policy is essential.

Scope

This Policy applies to all stakeholders including staff (permanent and temporary), trustees and governors, volunteers, work experience placements and pupils, contractors, third-party providers and any other individuals, using third party open-source GenAI tools on company devices and/or for Transform Trust work, including all schools within the Trust.

Use of GenAI Tools through personal accounts for any Transform Trust work, including but not limited to, for research purposes, is prohibited.

Appropriate use

All stakeholders must ensure the following principles are adhered to when using AI to generate any form of content which includes, but is not limited to video, images or written content:

- AI tools **must not** be used to generate images or video material that are defamatory in nature; this includes content of a sexual nature, explicit format or pose any kind of risk to safeguarding.
- Users **must not** use the AI image or video tools to generate content of any individual without their written permission.
- Staff must ensure that Transform's Safeguarding Policy is applied at all times as the underlying principles when using AI or supporting pupils using AI in content creation.

Usage types discussed in this Policy

The two main types are those that include Personally Identifiable Information (PII) and those that do not.

Key usage criteria

The first two sub-sections are listed on the basis that you are not using PII, the third section is to be in addition to the first two sections if you are intending to use PII **(use of first name only does not constitute PII information if the person referred to cannot be identified).**

Prior to use

- Check there is a DPIA in place for the tool you wish to use.
- Create an account using your Trust/School email address.
- Ensure a strong password.
- Enable multi factor authentication where available.
- Opt out of improving the GenAI Tool.

- Ensure that any OneDrive/SharePoint/Email/Google drive account is **NOT** connected.

During use

- Ensure only relevant information is included in the **input** or upload and PII has been removed (unless use of PII information has been pre-approved by the DPO).
- Review **output** for bias, fairness, accuracy, inappropriate use of intellectual property and modify as needed prior to sharing.
- Ensure use of the **output** complies with all relevant policies including data protection and safeguarding.

Use with Personally Identifiable Information

In addition to the above you must: -

- Ensure the DPIA for the tool you wish to use covers use of confidential information.
- Obtain consent from the DPO for your specific use case.
- Retain records of **input**.
- Retain records of **output**.

To enable effective monitoring of this type of use, use will only ever be permitted with a paid and centrally managed version of Microsoft 365 CoPilot.

Permitted GenAI Tools

Those tools with a DPO accepted DPIA that clearly defines the level of use in line with this Policy e.g. including the use of Personally Identifiable Information (PII) / excluding the use of PII information. The tools must be used in line with all relevant policies and procedures, remember when using confidential data that you also need to be mindful of our safeguarding and data protection policies.

Responsible Use

GenAI Tools should only be used to enhance productivity, creativity, and problem-solving.

- When you enter data into a GenAI Tool, your **input** is shared with the GenAI Tool therefore you should avoid inputting any information into a GenAI Tool which is restricted by law or Transform's policies.
- You must adhere to all ethical and legal standards when using third party open-source GenAI Tools. Usage that involves harmful, illegal, discriminatory, or malicious activities is strictly prohibited.
- You must respect intellectual property rights and ensure that any **output** complies with copyright and trademark laws and does not infringe on the rights of others. Err on the side of caution and do not use any **output** that you suspect may have intellectual property protections.
- You must not make any public statements about your use, or Transforms' use, of GenAI Tools, including, without limitation, during interviews, in social media, or on LinkedIn, without review and approval by the DPO & CFO.

Data Privacy

- Use of GenAI Tools on personal accounts to conduct any Transform' business is strictly prohibited.
- Use of GenAI Tools on personal devices to circumvent company policies or safeguards is also strictly prohibited.

- You are responsible for safeguarding confidential information and ensuring compliance with data protection regulations.
- Confidential information may only be used as **input** where explicit prior approval has been obtained from the DPO.

Bias and Fairness

GenAI Tools can inherit biases through training data usually through large, publicly available datasets (e.g. data extraction of public websites), so efforts must be made to avoid discrimination, mitigate bias and promote fairness in the **output**.

Accountability for Output

- You are accountable for the **output** generated using GenAI Tools. You must exercise due diligence in reviewing and verifying the accuracy and appropriateness of the **output** before sharing or publishing it.
- **Output** by GenAI Tools may contain inaccuracies, fictitious answers, biases as well as other's intellectual property and all **output** must be reviewed and corrected by you.

Definitions

Generative Artificial Intelligence (GenAI)

This means it can generate human-like text based on the input it receives, it can also generate art, music, literature, and other forms of creative content including creating realistic images, videos, or enhance the quality of images. It can also create solutions, processes and forecast.

What is Personally Identifiable Information

- Sensitive data e.g. behaviour records, medical records, passwords
- Personal data such as: -
  - Full name
  - Any form of official Identification number such as payroll number, Universal Pupil Number (UPN), National Insurance Number
  - Location data
  - Online identifier (e.g., IP addresses, cookie identifiers)
  - Physical, physiological, genetic, mental, economic, cultural, or social identity factors
- Special category data such as: -
  - Racial or ethnic origin
  - Political opinions
  - Religious or philosophical beliefs
  - Trade union membership
  - Genetic data
  - Biometric data (when processed to uniquely identify an individual)
  - Health-related data
  - Data concerning a person's sex life or sexual orientation

Use of Personally Identifiable Information (PII)

The use of any PII as defined here or within any data protection policies must not be used without prior approval from the DPO and if approved strict adherence to the policies and procedures must be maintained.

Input

Is defined as any information, data, prompts, questions, text, images, videos or other content input or otherwise inputted into a GenAI tool.

Output

Is defined as any images, videos, source code, text or any other content created or otherwise generated by a GenAI tool.

Monitoring

Disciplinary action may be taken against any member of staff who fails to comply with or commits a breach of this Policy.

Review

This Policy will be reviewed at least annually and sooner should there be significant changes.