Board Briefing: Preparing for Future AI Scrutiny

Audience: Board of Trustees / Governing Board
Purpose: To help the Board understand the emerging scrutiny around AI use and agree the governance, evidence and assurance steps needed to demonstrate responsible adoption.

Executive Summary

The Board is asked to note the emerging scrutiny around AI use, agree that AI governance should be treated as a strategic risk and assurance priority, and support the development of a trust-wide AI governance action plan over the next 12 months.

Artificial Intelligence (AI) is becoming embedded across education through productivity tools, learning platforms, management information systems and third-party suppliers. It offers clear opportunities, but it also creates governance, accountability, safeguarding, data protection and assurance risks that require board-level oversight.

Sector evidence suggests that AI adoption is moving faster than governance maturity. Many Multi-Academy Trusts are beginning to introduce policies and controls, but fewer can demonstrate consistent board oversight, approved tool registers or evidence of assurance. The GDPRiS AI Governance in MATs 2026 Benchmark Report found that governance activity is increasing, while leadership assurance remains less developed.

The key point for the Board is that AI governance should not be framed narrowly as “regulation is coming”. A stronger position is that government guidance, ICO expectations and board-level scrutiny are all moving in the same direction. Trusts are increasingly expected to demonstrate responsible AI governance, even though a formal education-specific AI regulatory framework is not yet in place.

- Clear accountability
- Effective risk management
- Appropriate human oversight
- Transparency of AI use
- Evidence of governance and assurance

Why This Matters

For boards, the key question is no longer simply whether AI is being used. It is whether the trust can demonstrate that AI is being used safely, responsibly and appropriately.

“AI governance should be treated as a strategic issue requiring the same level of oversight already applied to cyber security, safeguarding, information governance and organisational risk.”

What Future AI Scrutiny Is Likely to Focus On

In the UK, AI oversight is currently developing through guidance, regulator expectations, sector standards and existing duties around data protection, safeguarding, procurement and accountability. For trusts, the practical preparation point is not to wait for a single AI law, but to build evidence that AI use is understood, risk assessed, monitored and managed through existing assurance structures.

The gap between AI adoption and AI governance is now a strategic concern. Many trusts are already experimenting with AI tools, but fewer have the governance framework, evidence base and reporting mechanisms needed to assure trustees, parents, regulators and auditors that AI is being used appropriately.

Area of scrutiny	What trusts may need to demonstrate
Governance & Accountability	A named owner for AI governance, defined responsibilities, decision-making processes, acceptable use policies and regular governance reviews.
Visibility & Control	Awareness of AI tools being used, approval processes for new tools, management of unauthorised “shadow AI” and registers of approved AI solutions.
Risk Management	AI-related risks identified, reflected in organisational risk registers, assessed before implementation and supported by incident management processes.
Data Protection & Safeguarding	Supplier AI processing understood, privacy assessments completed where appropriate, human oversight in place and safeguarding considered before deployment.
Board Assurance	Evidence of what AI is being used, what risks have been identified, how assurance is supported and how compliance is monitored.

Questions Trustees Should Be Asking

- Who is accountable for AI governance?
- Do we assess suppliers’ AI capabilities and risks?
- Do we have an approved AI policy?
- Do we know which AI tools are being used?
- How is children’s data protected when AI is used?
- Have AI-related risks been assessed?
- Are AI risks recorded within our risk register?
- Do staff receive guidance and training?
- What reporting does the Board receive?
- Could we evidence our governance approach if challenged by regulators, auditors or parents?

Recommended Actions for the Next 12 Months

Timing	Recommended actions
Immediate priorities 0–3 months	Assign executive responsibility for AI governance; review current AI usage across the trust; begin identifying approved and unapproved AI tools; add AI as a standing item on relevant governance agendas.
Medium-term priorities 3–6 months	Develop or review AI policy and guidance; undertake an AI risk assessment; review supplier contracts and AI processing practices; establish an approval process for new AI technologies.
Strategic priorities 6–12 months	Introduce routine board reporting on AI governance; develop an AI assurance framework; deliver trustee and staff awareness training; integrate AI governance into wider risk, cyber security and compliance frameworks.

Board Recommendation

The Board should recognise AI governance as an emerging strategic responsibility rather than a temporary technology initiative. A practical objective for the next 12 months should be to ensure the trust can demonstrate visibility of AI use, clear accountability, effective risk management, protection of children’s data and credible board assurance.

Key message: AI adoption is becoming mainstream. Governance is developing. Formal regulation may still be evolving, but expectations around evidence, accountability and assurance are already increasing. Trusts should act now so they can demonstrate responsible AI governance before external scrutiny becomes more formalised.