# Policy Information Sheet

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| **Name of Policy:** | **Artificial Intelligence (AI) Policy** |
| Delegated Authority | ☒ Trust Board<br>☐ Nominated Committee<br>☐ CEO<br>☐ CFO<br>☐Other _____ |
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## 1. Policy Statement

At Hartlepool Free School, we recognise that the use of artificial intelligence (AI) can help to positively affect teacher workload, develop pupils' intellectual capabilities and prepare them for how emerging technologies will change workplaces. While there are many benefits to the use of AI tools, the content they produce may not always be accurate, safe or appropriate, and could lead to malpractice.

Through the measures outlined in this policy, Hartlepool Free School aims to ensure that AI is used effectively, safely and appropriately to deliver excellent education that prepares our pupils to contribute to society and the future workplace.

For the purposes of this policy, the following terms are defined as:

- **AI** – The theory and development of computer systems able to perform tasks normally requiring human intelligence, e.g. visual perception, speech recognition, decision-making.
- **Generative AI** – A category of AI algorithms that generate new outputs based on the data they have been trained on.
- **Misuse of AI** – Any use of AI which means that pupils have not independently demonstrated their own attainment.

## 2. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- Online Safety Act 2023
- DfE 'Keeping children safe in education 2025'
- DfE 'Generative artificial intelligence (AI) in education'
- DfE 'Meeting digital and technology standards in schools and colleges'
- DfE 'Generative AI: product safety standards'
- JCQ 'AI Use in Assessments: Your role in protecting the Integrity of qualifications'
- JCQ 'Suspected Malpractice Policies and Procedures'

This policy operates in conjunction with the following school policies:

- Online Safety Policy
- Cyber Response and Recovery Plan
- Data Protection Policy

- Child Protection and Safeguarding Policy
- Device and Technology Acceptable Use Agreement for Pupils
- Device and Technology Acceptable Use Agreement for Staff

**3. Roles and responsibilities**

The Trust Board will be responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Reviewing this policy on an **annual** basis.
- Ensuring their own knowledge of the use of AI tools in the school is up-to-date.
- Ensuring all staff undergo child protection and safeguarding training, including online safety, at induction and at regular intervals.
- Ensuring Hartlepool Free School follows the DfE's digital and technology standards.

The Principal will be responsible for:

- Ensuring that staff receive regular, up-to-date training on how to use AI tools in school.
- Ensuring that the use of AI tools in Hartlepool Free School is integrated into relevant policies and procedures, the curriculum and staff training.
- Communicating with parents to ensure they are kept up-to-date with how AI tools are being used in Hartlepool Free School, how this will impact pupils' education and how Hartlepool Free School is ensuring the tools are being used safely and effectively.
- Working with the Trust Board to review and update this policy on an **annual** basis.
- Ensuring that AI practices are audited and evaluated on a regular basis.
- Ensuring an appropriate risk assessment is completed before new AI tools are approved for school use.
- Ensuring providers of AI tools meet the DfE's product safety standards for use in educational settings.

ICT technicians will be responsible for:

- Providing technical support in the development and implementation of Hartlepool Free School's AI practices, policies and procedures.
- Implementing appropriate security measures.
- Ensuring that the use of AI tools is taken into consideration when creating policies and procedures regarding online safety, child protection and safeguarding, and data protection.

The DPO will be responsible for:

- Keeping up-to-date and informed with AI technologies relevant to Hartlepool Free School.
- Understanding and maintaining awareness of what the use of AI means for data protection in Hartlepool Free School.
- Advising Hartlepool Free School on how to integrate the use of AI while complying with data protection regulations.

The DSL will be responsible for:

- Taking the lead responsibility for online safety in Hartlepool Free School.
- Undertaking training so they understand the risks associated with using AI tools in Hartlepool Free School.
- Liaising with relevant members of staff on online safety matters.
- Maintaining records of reported online safety concerns relating to the use of AI tools, as well as the actions taken in response to concerns.
- Reporting to the Trust Board about the use of AI tools on a **termly** basis and how it links to safeguarding.

All staff members will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Taking responsibility for the security of the AI tools and data they use or have access to.
- Modelling good online behaviours when using AI tools.
- Maintaining a professional level of conduct in their use of AI tools.

- Having an awareness of the risks that using AI tools in Hartlepool Free School poses.
- Reporting concerns in line with Hartlepool Free School's reporting procedure.
- Where relevant to their role, ensuring that the safe and effective use of AI tools is embedded in their teaching of the curriculum.
- Familiarising themselves with any AI tools used by Hartlepool Free School and the risks they pose.

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from the relevant school staff if they are concerned about an experience that they or a peer has experienced while using AI tools.
- Reporting concerns in line with Hartlepool Free School's reporting procedure.
- Familiarising themselves with any AI tools used Hartlepool Free School and the risks they pose.
- Submitting work that is demonstrably their own.

**4. Data protection and cyber-security**

Hartlepool Free School is aware of the data privacy and cyber-security implications that come with using generative AI tools, and will ensure that all AI tools are used in line with Hartlepool Free School's Data Protection Policy and Cyber-security Policy. Hartlepool Free School will follow the procedures in these policies to continue to protect pupils from harmful online content that could be produced by AI tools.

Hartlepool Free School will use data anonymisation techniques, e.g. by using pseudonyms, to ensure that any pupil data processed through AI tools for administrative purposes is not identifiable.

Data audits will be carried out on a **quarterly** basis to ensure that AI tools are not capturing or processing personal data inadvertently.

Only authorised staff members will be permitted to use AI for data-related activities.

All staff will be made aware that generative AI tools are able to create believable content of all kinds, for example credible email scams requesting payment, and that the content AI produces may seem more authoritative and believable than usual scams. All staff will apply their best judgement and common sense to manage cyber-security risks effectively and ensure that the DfE's cyber standards are followed at all times.

Hartlepool Free School will:

- Protect personal and special category data in accordance with data protection legislation.
- Be aware of intellectual property (IP) implications in line with the below section.
- Review and strengthen cyber security by referring to the DfE's cyber standards.
- Ensure that Hartlepool Free School's response to cyber security breaches considers AI-specific issues, e.g. data leakage from AI-generated output.
- Be mindful that generative AI could increase the sophistication and credibility of cyber attacks.
- Ensure that pupils are not accessing or creating harmful or inappropriate content online, including through AI tools.
- Refer to the DfE's Filtering and monitoring standards for schools and colleges to ensure that the appropriate systems are in place.
- Be mindful of the data privacy implications when using AI tools and will take steps to ensure that personal and special category data is protected in accordance with data protection legislation.

If it is necessary to use personal and special category data in AI tools, Hartlepool Free School will ensure that the tools comply with data protection legislation and existing privacy policies to protect the data.

Hartlepool Free School will be open and transparent whilst ensuring that data subjects understand their personal or special category data is being processed using AI tools.

**5. Intellectual property (IP) implications**

Hartlepool Free School will ensure that all uses of generative AI tools adhere strictly to IP laws and best practices.

Hartlepool Free School will recognise the importance of being aware of the IP implications when using these technologies, and only use IP materials to train AI if explicit permission from the copyright holder has been granted, or if a statutory exception applies.

Materials created by pupils and teachers will be recognised as copyright material, provided they meet the statutory standard for copyright. This standard is considered to be low and does not depend on the quality of the work produced.

Hartlepool Free School will understand that copyright law is distinct from data protection law, and any consents or data processing agreements for personal data are separate from issues of compliance with copyright legislation.

Hartlepool Free School will remain mindful that many free-to-access generative AI tools may use the inputs submitted by users to further train and refine their models. In contrast, certain paid tools may allow users to opt out of their inputs being used for such purposes. Hartlepool Free School will evaluate the terms of use for each AI tool to ensure compliance with copyright and intellectual property laws.

**Examples of Original Creative Work**

Hartlepool Free School will recognise the following as examples of original creative work that may be protected by copyright:

- Essays, homework, or any other materials written or drawn by a pupil (not including responses to multiple-choice questions, as these are less likely to constitute copyright work).
- Lesson plans created by a teacher.
- Prompts entered into generative AI tools that produce substantial content.

**6. Permission to Use**

Hartlepool Free School will not allow or cause pupils' original work to be used to train generative AI models unless explicit permission is obtained, or an exception to copyright applies. Permission will need to be granted by:

- The pupil, as the copyright owner.
- The pupil's parent or legal guardian, if the pupil is unable to consent independently.

Hartlepool Free School will ensure that any use of pupil or teacher-created content is handled with full compliance with copyright laws. Where exceptions to copyright may apply, the school will seek legal advice to ensure lawful usage.

**7. Secondary Infringement Awareness**

Hartlepool Free School will be vigilant in avoiding secondary infringement of intellectual property. This could occur if AI-generated products are trained on unlicensed materials and are then used in educational settings or published more widely - or example, on Hartlepool Free School's website.

Hartlepool Free School will acknowledge the following as potential risks associated with secondary infringement:

- Publishing a policy generated by an AI tool that used input derived from another school or college's policy without obtaining permission.
- Using an image created by an AI tool that was trained on copyrighted material without the copyright holder's consent.

Hartlepool Free School will put measures in place to verify the intellectual property rights of any AI-generated outputs before their use in public or educational contexts.

**8. Using AI tools**

Hartlepool Free School will ensure that AI tools are used appropriately to achieve the following aims:

- To reduce workload
- To free up teachers' time
- To assist with the production of high-quality and compliant administrative plans, policies and documents
- To support the teaching of a knowledge-rich computing curriculum
- To teach pupils:
    - How to use emerging technologies safely and appropriately.
    - About the limitations, reliability and potential bias of AI tools.
    - How information on the internet is organised and ranked.
    - How online safety practices can protect against harmful and misleading content.
- To identify and use appropriate resources to support their education, including age-appropriate resources and preventing over-reliance on a limited number of tools or resources.
- Whilst recognising that AI tools can be used appropriately and with benefit to teaching and learning, Hartlepool Free School will keep in mind that the content produced by AI tools can be:
    - Inaccurate.
    - Inappropriate.
    - Biased.
    - Taken out of context and without permission.
    - Out of date or unreliable.

AI tools will not be used for educational resources without appropriate fact-checking and quality assurance measures in place.

Before adopting any generative AI tool, Hartlepool Free School will complete a proportionate risk assessment covering safeguarding, data protection, bias, reliability, and misuse risks.

Where AI tools are used to produce administrative plans, policies and documents, all staff members will understand that the quality and content of the final document remains the professional responsibility of the staff member who produced it. Staff members using AI tools to create documents will not assume that AI output will be comparable with a human-designed document that has been developed in the specific context of the school.

Pupils will be made aware of the importance of referencing AI tools correctly when using AI tools to produce work, especially if the work is for an assessment, in order to allow teachers and assessors to review how AI has been used and whether it was appropriate. Pupils' references to AI sources will show the name of the AI source and the date that the content was generated.

Pupils will retain a copy of the questions and AI generated content for reference and authentication purposes in a non-editable format, e.g. a screenshot. Pupils will also provide a brief explanation of how AI tools have been used.

When using AI tools, staff and pupils will ensure that any content produced is scrutinised and cross-checked for its appropriateness and accuracy.

Staff members will be aware that AI tools return results based on the dataset it has been trained on – it may not have been trained on the national curriculum, and may not provide results that are comparable with a human-designed resource developed in the context of the national curriculum. Staff members will be mindful of this in their teaching and marking of pupils' work.

Pupils and staff members will be reminded that using AI tools cannot replace the judgement and deep subject knowledge of a human expert. Staff members will stress the importance of pupils acquiring their own knowledge, expertise and intellectual capability rather than relying on AI tools in their work.

Hartlepool Free School will not allow or cause pupils' original work to be used to train AI tools unless it has appropriate consent or exemption to copyright. Consent will be sought from students over 18; however, for pupils under 18, consent will be sought via their parents.

Where pupils use AI tools, staff will ensure the tool is appropriate for the pupil's age and that the provider's terms of use, including any minimum age requirements, are complied with.

Hartlepool Free School will ensure that any AI products and systems used meet the DfE's 'Generative AI: product safety standards'.

## 9. Misusing AI tools

### Preventing misuse

Hartlepool Free School acknowledges that misuse of AI tools can happen both accidentally and intentionally, and that education and awareness is key to preventing misuse. Hartlepool Free School will consider taking the following actions to prevent the misuse of AI tools:

- Restricting access to online AI tools on school devices and networks, especially on devices used for exams and assessments
- Setting reasonable deadlines for submission of work and providing pupils with regular reminders
- Allocating time for sufficient portions of pupils' work to be completed in class under direct supervision, where appropriate
- Examining intermediate stages in the production of pupils' work to ensure that work is being completed in a planned and timely manner, and that work submitted represents a natural continuation of earlier stages
- Introducing classroom activities that use the level of knowledge and understanding achieved during lessons to ensure the teacher is confident that pupils understand the material
- Engaging pupils in verbal discussions about their work to ascertain that they understand it and that it reflects their own independent work
- Refusing to accept work that is suspected to have been generated through misuse of AI tools without further investigation
- Issuing tasks which are, wherever possible, topical, current and specific, and require the creation of content which is less likely to be accessible to AI models
- Investing in educating and training staff, pupils and parents on the use of AI tools and raising awareness of the risks and issues that come with its use

### Identifying misuse

Staff members will continue to use the skills and observation techniques already in use to assure themselves that pupils' work is authentically their own when attempting to identify a misuse of AI tools.

When reviewing pupils' work to ensure its authenticity, staff members will compare it against other work created by the pupil. Where the work is made up by writing, the staff members will make note of:

- Spelling and punctuation.
- Grammatical usage.
- Writing style and tone.
- Vocabulary.
- Complexity and coherency.
- General understanding and working level.
- The mode of production, i.e. whether the work was handwritten or word-processed.

Staff members will be aware of and look out for potential indicators of AI use, which include:

- A default use of American spelling, currency, terms and other localisations.
- A default use of language or vocabulary which might not appropriate to the working or qualification level.
- A lack of direct quotations and/or use of references where these are required or expected.
- Inclusion of references which cannot be found or verified.
- A lack of reference to events occurring after a certain date, reflecting when an AI tool's data source was compiled.
- Instances of incorrect or inconsistent use of first-person and third-person perspective where AI generated text has been left unaltered.
- A variation in the style of language evidenced in a piece of work, if a pupil has taken specific portions of text from an AI tool and then amended it.
- A lack of graphs, data tables or visual aids where these would normally be expected.
- A lack of specific, local or topical knowledge.
- Content being more generic in nature.
- The inadvertent inclusion of warnings or provisos produced by AI tools to highlight the limits of its ability or the hypothetical nature of its output.
- The submission of pupil work in a typed format, where this is not usual, expected or required.

- The unusual use of several concluding statements throughout the text, or several repetitions of an overarching essay structure within a single lengthy essay.
- The inclusion of confidently incorrect statements within otherwise cohesive content.
- Overly verbose or hyperbolic language that may not be in keeping with the pupil's usual style.

Staff members will remain aware that AI tools can be instructed to employ different languages and levels of proficiency when generating content, and some are able to produce quotations and references.

Where necessary, the school will make use of the following programmes and services that are able to analyse content and determine the likelihood that it was produced by AI:

- Copyleaks
- GPTZero
- Sapling
- Turnitin AI writing detection

Staff members will be mindful that the above tools will give lower scores for AI-generated content which has been subsequently amended by pupils and should spend time getting to know how the detection tools work to understand their capabilities. Teachers will also use their own understanding of pupils' past work to gain a holistic oversight of the authenticity of work that has been submitted.

**10. Exams and assessments**

Hartlepool Free School will continue to take reasonable steps where applicable to prevent malpractice involving the use of generative AI tools regarding exams and assessments..

Pupils will be made aware of the school's approach to plagiarism and malpractice, appropriate and inappropriate uses of AI tools, and the consequences of its misuse. Pupils will be made aware that it is not acceptable to submit work that has been produced with an AI tool. Pupils will also be made aware of the risks of using AI tools to complete exams and assessments, which include:

- Submitting work that is incorrect or biased.
- Submitting work that provides dangerous and/or harmful answers.
- Submitting work that contains fake references.

Hartlepool Free School will ensure that pupils are issued with, and fully understand, the JCQ Information for Candidates. Hartlepool Free School will also ensure that parents are

issued with a **letter** informing them of the risk of using AI tools, what constitutes as misuse, and the school's approach to malpractice.

Teachers, assessors and other relevant staff members will discuss the use of AI tools and agree a joint approach to managing pupils' use of AI tools in Hartlepool Free School.

Pupils will only be permitted to use AI tools to assist with assessments where the conditions of the assessment permit the use of the internet, and where the pupil is able to demonstrate that the final submission is the product of their own independent work and thinking.

Pupils will be required to sign a declaration to confirm that they understand what AI misuse is, and that it unacceptable. Pupils will be made aware of the consequences of submitting a false declaration, and any AI misuse that is detected after a declaration has been signed will be reported to the relevant awarding organisation. The misuse of AI constitutes malpractice, as defined in the JCQ's guidance. Pupils will be made aware that possible sanctions for committing malpractice through the misuse of AI tools include disqualification and debarment from taking qualifications for a number of years, and that their marks may also be affected. Misuse of AI tools includes, but is not limited to, the following:

- Copying or paraphrasing sections, or whole responses, of AI generated content
- Using AI to complete parts of the assessment so that the work does not reflect the pupil's own work, analysis, evaluation or calculations
- Failing to acknowledge the use of AI tools when they have been used as a source of information
- Incomplete or poor acknowledgement of AI tools
- Submitting work with intentionally incomplete or misleading references and/or bibliographies

Hartlepool Free School will not, under any circumstances, accept work which is not the pupils' own.

**11. Safeguarding**

Hartlepool Free School acknowledges that generative AI tools can be used to produce content that is dangerous, harmful, and inappropriate. Hartlepool Free School will follow the procedures set out in the Child Protection and Safeguarding Policy and the Online Safety Policy to ensure that pupils are not able to access or be exposed to harmful content.

Pupils will be taught about the risks of using AI tools and how to use them safely. Pupils will be made aware of how to report any concerns or incidents involving generative AI, and who to talk to about any issues regarding the use of AI tools.

Hartlepool Free School will engage with parents via **letter** to inform them of the safeguarding risks that come with using AI tools, and how the school is protecting pupils online. Hartlepool Free School will ensure that parents are aware of who to speak to about any concerns or issues regarding the use of AI.

Hartlepool Free School will ensure that the appropriate filtering and monitoring systems are in place to protect pupils online, following the DfE's filtering and monitoring standards.

All staff members will receive training on the safe use of AI as part of their online safety training, which is regularly updated.

**12. Teaching pupils about the safe use of AI**

Teaching about the safe and appropriate use of AI will ensure that pupils benefit from a knowledge-rich curriculum which enables them to become well-informed users of technology and understand its impact on society. Pupils will gain strong foundational knowledge which ensures they are developing the right skills to make the best use of AI tools.

Hartlepool Free School will:

- Prepare pupils for changing workplaces.
- Teach pupils how to use emerging technologies, including AI tools, safely and appropriately.
- Raise awareness of the limitations, reliability and potential bias of AI tools.
- Help pupils to understand how information on the internet is organised and ranked.
- Include online safety teaching in the curriculum and how to protect against harmful or misleading content.
- Raise awareness and understanding of protecting intellectual property rights.
- Encourage the safe and responsible use of digital content.
- Teach about the impact of technology, including disruptive and enabling technologies.
- Include teaching about how computers work, connect with each other, follow rules and process data in the curriculum.

Pupils will be supported to identify and use appropriate resources to support their ongoing education through the use of age-appropriate resources, which may include AI tools, whilst preventing over-reliance on a limited number of tools or resources.