Holy Trinity CofE Primary School

Safe Use of AI Policy

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Vision Statement

At Holy Trinity we believe that all people are precious and honoured in God's sight. From this belief comes a determination for all within our community to experience life in all its fullness, as promised by Jesus.

We embrace the holistic development for all in our community so that they may flourish academically, emotionally, and spiritually.

All that we do is underpinned by the modelling and promotion of six core values. These are: Justice, Service, Perseverance, Gratitude, Compassion, Courage and build on previous values of Peace, Hope, Friendship, Respect, Honesty and Forgiveness.

We offer a vision of human flourishing for all, one that embraces excellence and academic rigor, but sets them in a wider framework.

Statement of intent

At Holy Trinity, 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, the 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.

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’
- DfE's 'Meeting digital and technology standards in schools and colleges'
- 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-security Policy
- Data Protection Policy
- Child Protection and Safeguarding Policy
- ICT Acceptable Use Agreement for Pupils
- ICT Acceptable Use Agreement for Staff

Roles and responsibilities

The governing 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 the school has regard to the DfE's 'Meeting digital and technology standards in schools and colleges'

The headteacher 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 the 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 the school, how this will impact pupils' education and how the school is ensuring the tools are being used safely and effectively.
- Working with the governing 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 educational, safeguarding, cyber security and data protection 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 the 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 the school.
- Understanding and maintaining awareness of what the use of AI means for data protection in the school.
- Advising the 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 school.
- Undertaking training so they understand the safeguarding risks associated with AI tools, including AI-generated content, manipulated media and their potential impact on children.
- 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 governing 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 school poses.
- Reporting concerns in line with the 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 the school and the risks they pose.
- Exercising professional judgement when using AI-generated content and ensuring all outputs are reviewed for accuracy, bias and appropriateness before use.

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 the school's reporting procedure.
- Familiarising themselves with any AI tools used by the school and the risks they pose.
- Submitting work that is demonstrably their own.

Data protection and cyber-security

The 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 the school's Data Protection Policy and Cyber-security Policy. The school will follow the procedures in these policies to ensure AI tools are used securely, responsibly and in compliance with data protection and cyber-security requirements.

The 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 **termly** 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.

The 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 the 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 AI tools are configured and used in a manner that minimises the risk of generating harmful, inappropriate or unsafe outputs.
- Refer to the DfE's Filtering and monitoring standards for schools and colleges to ensure that the appropriate systems are in place.

If it is necessary to use personal and special category data in AI tools, the school will ensure that the tool has been approved for this purpose, complies with data protection legislation and provides appropriate technical and organisational safeguards.

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

Intellectual property (IP) implications

The school will take reasonable steps ensure that uses of generative AI tools comply with IP laws and good practices.

The school will not knowingly upload copyright-protected material to AI tools where this could result in that material being retained, reused or used to train third-party AI models without the appropriate permissions or lawful basis.

Materials created by pupils and staff 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.

The 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.

The 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. The 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

The 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
- Original prompts that are sufficiently creative to qualify for copyright protection

Permission to use

The school will not knowingly upload pupils' original work to AI systems where that work may be retained or used to train third-party AI models unless this is authorised or another lawful basis applies.

The school will ensure that any use of pupil or staff-created content is handled with full compliance with copyright laws. Where there is uncertainty regarding copyright ownership or permitted use, the school will seek appropriate advice before proceeding.

Secondary infringement awareness

The 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, e.g. on the school's website.

The 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.

The school will take reasonable steps to consider the IP implications of AI-generated outputs before using them publicly or for educational purposes.

Using AI tools

The school will ensure that AI tools are used appropriately to achieve the following aims:

- To reduce excessive workload and free up staff time for teaching, learning and supporting pupils.
- 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, the 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-generated educational resources will only be used where they have been reviewed, fact-checked and judged appropriate by a member of staff.

Before adopting any generative AI tool, the 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.

Where an AI tool has been used to support assessed work, 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.

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.

AI tools will be used to support the professional judgement of staff. Decisions affecting pupils' education, safeguarding or wellbeing will always be made by an appropriately trained member of staff.

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

Misusing AI tools

Preventing misuse

The school acknowledges that misuse of AI tools can happen both accidentally and intentionally, and that education and awareness is key to preventing misuse. The 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
- Investigating work that is suspected to have been generated through misuse of AI tools before determining the appropriate course of action
- 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 be 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 where this would be reasonably expected.
- 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 appropriate, the school may make use of AI writing detection or content analysis tools to support investigations into suspected misuse. Any such tools will only be used as one source of information and will not be relied upon as the sole basis for determining whether malpractice has occurred.

Staff members will understand that AI detection tools have limitations and may produce false positives or false negatives. Detection results will therefore be considered alongside professional judgement and other available evidence.

Exams and assessments

The 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 by an AI tool as if it were their own, or to use AI in a way that breaches the requirements of an assessment or exam.

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.

The school will ensure that pupils are issued with, and fully understand, the JCQ Information for Candidates. The school will also ensure that parents are issued with **a letter** informing them of the risk of using AI tools, what constitutes 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 the 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

The school will investigate any concerns regarding the authenticity of submitted work and will not accept work that is found not to be the pupil's own.

Safeguarding

The school acknowledges that generative AI tools can be used to produce content that is dangerous, harmful and inappropriate, including AI-generated or manipulated images, videos and audio (commonly referred to as 'deepfakes'), as well as content that may facilitate bullying, harassment, exploitation, the making or sharing of nudes and semi-nudes, misinformation and other forms of abuse.

The 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 using school devices.

Pupils will be taught about how to use AI tools safely and the risks associated with them, including AI-generated deepfakes, manipulated images and videos, the making or sharing of nudes and semi-nudes, misinformation, and impersonation, and how to recognise and respond to these risks 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.

The 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. The school will ensure that parents are aware of who to speak to about any concerns or issues regarding the use of AI.

The 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. The school will ensure that its filtering systems block access to AI platforms that are unsuitable for pupils or present an unacceptable safeguarding risk, including those that are

designed to generate explicit, harmful or age-inappropriate content. In line with the Online Safety Policy, filtering and monitoring systems will be reviewed at least annually and a record of these reviews will be kept.

All staff members will receive training on the safe use of AI as part of their online safety training, which is regularly updated. This will include recognising and responding to safeguarding concerns involving AI-generated content, including manipulated media, deepfakes, the making or sharing of nudes and semi-nudes, online exploitation and other emerging AI-related risks.

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.

The 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, including how to recognise and protect against harmful or misleading AI-generated content, deepfakes, manipulated images, misinformation and the misuse of AI to create or share harmful 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.
- Teach pupils to critically evaluate AI-generated content, question its accuracy, identify bias, verify information using reliable sources and recognise when AI-generated responses may be inaccurate or misleading.
- Teach pupils about protecting their personal information and understanding what data should and should not be shared with AI tools.

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.

Monitoring and review

The governing board and headteacher will review this policy in full on an annual basis and following any incidents that occur due to the use of AI tools, e.g. data protection or cyber-security.

The next scheduled review date for this policy is October 2027.

Any changes made to this policy are communicated to all members of the school community.