FHS
Francis Holland Schools

AI (Artificial Intelligence) Policy

CHANGES IN THIS POLICY

Para 1 Summary – Updated guidance references and links

Para 3 Guiding Principles – Now includes specific detail from the recently updated Govt guidances, and updated phraseology re the schools' principles.

Para 4 Safeguarding and the Use of AI in Education – updated content in line with updated guidance – "AI can generate new content, such as images and text, which may be harmful or misleading. [NEW element -] This includes risks arising from AI-generated content, including deepfakes, synthetic imagery, misinformation, impersonation, online abuse, and the creation or sharing of harmful content".

Para 4 New paragraph re ensuring pupils are aware of the importance of the human factor in pastoral care/safeguarding support etc. (as opposed to the AI limitations in these areas.

Para 7.1 Age Limits and Parental Consent – new introductory sentence re age limits of platforms. New content re "Decisions about pupil use of AI are made by the School Leadership Team (SLT) and the Designated Safeguarding Lead (DSL). Each decision considers the contextual safeguarding risks, the likely academic impact, and the age and needs of the pupils involved".

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Artificial Intelligence (AI) Policy

This policy applies to:
Francis Holland Regent's Park
Francis Holland Sloane Square
Francis Holland Prep
Francis Holland Schools Trust Central Functions

Where there are differences between the schools these have been clearly highlighted.

Related Policies:

- Data Protection Policy
- Privacy Notices
- Digital Technology Acceptable Use Agreement (Staff)
- Safeguarding and Child Protection Policy
- Online Safety Policy
- Academic Integrity Policy
- Pupil Acceptable Use Agreement (Digital Technology)

1. Executive Summary

This policy outlines Francis Holland Schools Trust's ('the Trust') commitment to the responsible, ethical, and effective use of Artificial Intelligence (AI) technologies across all educational and administrative settings. It aligns with:

- Current Department for Education guidance relating to AI in education including safeguarding and online safety,
- The DfE's Filtering and Monitoring Standards, and Cybersecurity Standards for Schools and Colleges,
- Online Safety Act - GOV.UK (the Act applies to certain AI services and AI-generated content where they fall within the Act's scope),
- Crime and Policing Act (June 2026),
- Keeping children safe in education 2026: September 2026
- UK GDPR (2021), Data Protection Act (2018),
- Introduction to the Children's code | ICO (the Code contains 15 standards that online services need to follow. This ensures they are complying with their obligations under data protection law to protect children's data online),
- Copyright, Designs and Patents Act (1988),
- Joint Council for Qualifications (JCQ) guidance on AI Use in Assessments (latest edition),
- ISI expectations, and
- the values of each school in the Trust.

The policy applies to all staff, pupils, and third parties and provides:

- Clear guidelines for selecting, implementing, and evaluating AI tools
- Defined roles and responsibilities for AI use
- Measures to ensure safety, privacy, fairness, and academic integrity
- A framework for educating pupils about the opportunities and limitations of AI

AI is used to enhance teaching, learning, and school operations—without replacing human judgment or compromising educational values.

2. Introduction, Purpose and Scope

The Trust recognises the potential of AI, including generative AI (Gen AI) and large language models (LLMs), to transform leadership, teaching, learning, and administration. This policy sets out how we use AI to improve educational outcomes, reduce staff workload, and prepare pupils for the future.

Our approach ensures safe, fair, and inclusive implementation of AI in line with UK regulations. The policy applies to all pupils, teachers, staff, and third-party providers across all key stages.

Key objectives:

- Promote safe, secure, and ethical AI use
- Support academic excellence through AI-enhanced learning
- Provide clear expectations for pupil and staff use of AI
- Prevent misuse and uphold academic integrity
- Ensure transparency and human oversight
- Embed AI literacy and critical evaluation in the curriculum

This policy applies to all AI technologies in use, including generative tools (e.g., ChatGPT), administrative systems, feedback platforms, data analysis tools, and personalised learning systems.

3. Guiding Principles

The Generative AI: product safety standards - GOV.UK (updated 19 Jan 2026) sets requirements for AI products in education:

- **Clear stated purpose and use cases** (e.g., personalised learning, assessment, research aid, engagement tools).
- **No automatic final answers** — pupils must make an initial attempt before receiving solutions.
- **Monitoring of offloading** — systems should detect when learners transfer cognitive work to the AI.
- **Evidence-based claims** — all capabilities must be supported by robust, transparent evidence.
- **Focus on cognitive development** — tools must support active learning, not passive consumption.

These standards apply to all AI products deployed in English schools and colleges, with suppliers responsible for compliance.

The Standards and the DfE AI-in-Education update (May 2026) explicitly require schools to consider the issue of cognitive offloading in the use of AI by learners, whereby its use might transfer the thinking itself to the AI system, bypassing the “desirable difficulties” that build durable knowledge. Research shows that when AI is used to perform cognitive tasks repeatedly, this can result in gradual decline in memory, critical thinking and creativity – this must be carefully considered by Schools when learners are using AI.

The Trust’s Guiding Principles are therefore:

- Educational benefit: AI must support learning and offer demonstrable academic value.
- Fairness and accessibility: AI should promote inclusion and must not disadvantage any pupil.
- Safety and security: AI tools must be risk assessed and meet cybersecurity standards. We adopt a tool only where its educational benefits clearly outweigh the risks.
- Privacy and data protection: Use of AI must comply with data protection law, including the UK GDPR, and be covered by clear data handling policies.
- Human oversight: AI assists professional judgement but never replaces it.

- Transparency: Pupils, parents and staff should understand how AI tools work and how they inform decisions.
- Academic integrity: AI must not be used to plagiarise or to bypass learning (cognitive offloading).
- Accuracy and bias: AI-generated content must be checked critically for accuracy, bias and fairness.
- Environmental sustainability: AI tools should be assessed for their long-term environmental and social impact.

4. Safeguarding and the Use of AI in Education

The integration of AI into education brings both exciting opportunities and critical safeguarding challenges. As technology evolves, so must our approaches to protecting pupils and promoting safe, meaningful learning. Safeguarding is a shared responsibility among all staff, and it is crucial to ensure that all staff understand the importance of safeguarding and are trained to handle AI-related risks. AI can generate new content, such as images and text, which may be harmful or misleading. This includes risks arising from AI-generated content, including deepfakes, synthetic imagery, misinformation, impersonation, online abuse, and the creation or sharing of harmful content. It is essential to understand the potential risks and pitfalls of AI use in educational settings. The DfE's Keeping Children Safe in Education (KCSIE) 2026 guidance Keeping children safe in education 2026: September 2026, its Filtering and Monitoring Standards, and Cybersecurity Standards for Schools and Colleges guidance, and the Online Safety Act now in force require us to ensure our filtering and monitoring systems are effective against AI-related risks.

AI can **assist** pastoral work in limited, supportive ways, but it cannot replace the human presence, empathy, and spiritual discernment that are essential to genuine pastoral care. AI systems must not be presented to pupils as substitutes for "the human" factor (emotional capacity, empathy, authenticity, spontaneity, physical presence and support, and a spiritual dimension) – all of which are provided in real human pastoral input, counselling and safeguarding support.

5. Roles and Responsibilities

5.1 Director of Technology

- Overall responsibility for the technical implementation and cyber-security of AI technologies
- Overall responsibility for data protection and privacy in the context of AI technologies, with the Data Protection Officer (Judicium)
- Identifying opportunities to deploy AI technologies trust-wide in accordance with the aims of this policy
- Maintaining a Trust-wide register of approved AI platforms, including their permitted uses, restrictions and review arrangements.

5.2 School Leadership Teams

- Overall responsibility for AI strategy and alignment with the goals of each school (Heads)
- Ensuring adequate resources and training for AI implementation (Heads, Staff Development and Digital Leads)
- Identifying opportunities to deploy AI technologies in each school in accordance with the aims of this policy (Heads & Digital Leads)
- Responsibility for monitoring and addressing safeguarding and pupil well-being in the context of AI (DSLs)

- Responsibility for ensuring AI technologies are implemented and employed in accordance with the ethical guidelines in this policy (Heads)
- Approving the educational use of AI within each school, in consultation with Digital Leads, the Director of Technology and the DSL where appropriate.

5.3 Trust Digital Strategy Committee

- Responsibility for co-ordinating implementation and governance of AI technologies across the Trust's schools
- Regular review and update of this policy

5.4 IT Department

- Technical implementation and maintenance of AI systems
- Ensuring security and robustness of AI tools
- Providing technical support and training to staff
- Closely supervise any pupil use – this includes using appropriate filtering and monitoring, and adherence to age restrictions.
- Supporting appropriate filtering, monitoring and technical safeguards for pupil use of AI, including adherence to platform age restrictions.

5.5 Teachers and Staff

- Responsible use of AI tools in teaching and administrative tasks
- Reporting any concerns or issues with AI systems
- Participating in relevant training and development
- Ensuring the AI-generated content used in teaching, assessment or communications is checked for accuracy, appropriateness and potential bias, with professional responsibility remaining with the member of staff.

5.6 Pupils

- Appropriate use of AI tools in their learning
- Reporting any concerns or issues to teachers or staff
- Understanding and following regulations concerning the use of AI in assessments

6. Implementation Guidelines

6.1 Selection and Procurement

AI tools must align with our educational values, ethical standards, and this policy. We prioritise transparent, sustainable, and scalable technologies. Tool selection is overseen by the Trust Digital Strategy Committee and by the corresponding school's Senior Leadership Team and Digital Leads. School leaders should use the AI Tool Evaluation Checklist. In addition, the follow points must be considered:

- Staff must NOT enter personal data, sensitive information, or pupil intellectual property (e.g. pupil work) into AI tools unless the tool has been explicitly approved for this purpose by the Director of Technology. These tools must not use such data to train their models.
- Staff may use AI platforms to support writing tasks—such as reports, letters, or emails—provided all identifiable information (e.g. names, ID numbers, contact details) is removed beforehand.
- Where an AI tool requires pupil account creation or will process personal data, a Data Protection Impact Assessment (DPIA) must be completed before use. See next point for adoption of new tools.

- Staff must only use approved AI platforms and must inform their school's Senior Leadership Team and Digital Leads if they wish to trial or adopt new AI tools. If the tool is then approved via the AI Tool Evaluation Checklist, staff may proceed with their trial. The Director of Technology will perform a DPIA if deemed necessary.

6.2 Data Management

The use of AI technologies must comply with the Trust's data protection standards. AI tools may process, store or use information entered by users, and staff must be aware of the risks associated with sharing personal, sensitive or confidential data. Any tools involving account creation, data sharing or the processing of personal information must be assessed to ensure compliance with UK GDPR and the Trust's data protection requirements. Further details are available in the Data Protection Policy.

6.3 Training and Support

Staff receive annual training on AI use and policy expectations, with ongoing CPD opportunities integrated into the broader staff development programme. Support is available via Digital Champions, INSET, coaching, and collaborative forums.

6.4 Monitoring and Evaluation

We evaluate AI's impact on teaching, leadership, and administration through annual reviews, and feedback from the school community.

6.5 Ethical Considerations

Ethical use of AI is central to our approach. We:

- Regularly assess potential ethical implications
- Involve pupils, parents, and the wider community in discussions
- Ensure AI use reflects school values
- Do not use AI to make decisions about pupils' futures (e.g. subject or career choices)

7. AI in Teaching, Learning and Assessment

7.1 Age Limits and Parental Consent

Where pupils are permitted to use AI tools, staff must take account of platform age restrictions and any requirements for parental consent. Most platforms prohibit use by children under 13 years and require parental consent up to the age of either 16 or 18.

Guidance about recommended ages can be found in the list of AI platforms that the schools refer to. Parental consent is granted in some situations under the Privacy Notice, but staff should seek advice from the Director of Technology concerning age limits and consent.

Decisions about pupil use of AI are made by the School Leadership Team (SLT) and the Designated Safeguarding Lead (DSL). Each decision considers the contextual safeguarding risks, the likely academic impact, and the age and needs of the pupils involved. We follow Keeping Children Safe in Education (KCSIE) and current best practice, including the DfE's filtering and monitoring standards.

Pupils may only use AI on designated platforms, with monitoring suited to their age and level of risk.

7.2 Data Protection and Intellectual Property

AI platforms may use prompts and other input to train their models. There is a risk that personal data used in training could be exposed by the model.

Pupils own the intellectual property rights to their work. Staff should not submit pupil work (e.g. homework, EPQs) to an AI model which might use it as training data or otherwise infringe the pupil's copyright, unless they have obtained the pupil's explicit consent or there is a legal exemption. For pupils under the age of 18, parental consent must also be sought. Platforms which do not use prompts for model training, or which have modes suitable for use with pupil intellectual property are identified in the appendices.

Exceptional care must be taken to avoid exposing identifiable personal or sensitive data when using AI models.

Further detail about data protection is given in the Data Protection Policy, including the requirement for a Data Protection Impact Assessment to be completed on platforms which involve account creation or process identifiable data. Staff wishing to trial a platform, should discuss this with a member of their School Leadership Team before proceeding.

7.3 Plagiarism

The use of AI to support learning is not necessarily plagiarism, provided it is expressly permitted by the teacher for the task in hand, and appropriately acknowledged where required. However, pupils must not use AI to complete work that is intended to demonstrate their own knowledge, understanding or independent thinking.

It is plagiarism to represent AI generated work as your own. This applies to all work undertaken at school including homework and external assessments. As detailed in the Academic Integrity Policy, pupils found to be committing plagiarism may be sanctioned.

7.4 External Assessments

AI may only be used in external assessments (e.g. EPQs, NEAs, coursework) as permitted by JCQ and exam board guidance. Pupils are expected to understand and follow this guidance in all external assessments. Failure to do so may result in disqualification or other actions by the exam board.

The School uses Turnitin Originality (Regent's Park only currently) and other tools to detect plagiarism and AI-generated content in externally assessed work. Further details are included in the Exams – Non-examined Assessments Policy.

Students must be able to demonstrate that submitted work is their own and must retain evidence of their independent work and any permitted use of AI. Full guidance on acceptable use, disclosure requirements, evidencing AI use, academic misconduct procedures, and potential sanctions is provided in the Academic Integrity Policy.

7.5 Referencing

Uncredited use of AI in assignments will be treated as academic misconduct. When including AI generated content in their work, pupils should include a reference in an appropriate format (e.g. MHRA or APA). This is essential if AI is used as part of an external assessment. The following additional information should be recorded:

- Model name (e.g. ChatGPT 4o)

- Date accessed
- Prompts
- Non-editable screenshots of the prompt(s) and response(s) which should be kept by the pupil and submitted as expressly directed by their teacher

7.6 Appropriate Use by Pupils

It is imperative that pupils develop the knowledge, skills and understanding of the subjects they are studying, and do not rely on AI. Pupils must be able to demonstrate the final submission of their work is the product of their own independent work and independent thinking.

Pupils should follow age limits and other terms and conditions when using AI platforms. AI tools can support learning, creativity, and revision but must never be relied on to complete work or bypass meaningful learning effort.

Pupils should be aware that generative AI can confidently report incorrect or misleading information ('hallucinations') as true in its output. Pupils are responsible for verifying AI generated content against reliable sources and need to critically evaluate the AI output to make sure it is accurate, free from bias, and appropriate for context.

The following are examples of inappropriate use of generative AI:

- Copying/paraphrasing AI content without attribution
- Using AI to complete assignments without demonstrating independent analysis
- Failing to acknowledge AI assistance in research or written work
- Submitting fabricated or misleading references created by AI

Where approved by the school and supervised by staff, generative AI may be used by pupils to:

- Prepare revision questions
- Get feedback and corrections on their work
- Assist with brainstorming and idea-generation

7.7 Use of Generative AI by Teachers

AI can support teaching by reducing workload, providing timely feedback, and facilitating personalised learning. It should be used to enhance, not replace, the professional judgment of teachers.

- AI may assist with feedback and planning, but the output of AI grading tools must always be reviewed by teachers.
- Predictive tools (e.g. learning analytics) must not be used to restrict or limit pupil opportunities.
- Homework policies should promote effective, age-appropriate AI use and discourage over-reliance.
- Any AI-driven monitoring will be transparent, proportionate, and clearly explained to pupils and parents.

8. AI and Digital Literacy

We are committed to preparing all pupils and staff for a future in which AI plays an increasing role. Our approach includes:

- Teaching pupils how to use emerging technologies, including generative AI, safely, ethically, and effectively
- Helping pupils understand the limitations, biases, and reliability issues of AI-generated content

- Developing digital skills such as online safety, content creation, and critical thinking
- Encouraging exploration of ethical and societal implications of AI
- Reinforcing that AI is a tool to support learning, not a substitute for original thought

For staff:

- Frequent training on the role of AI in education
- Ongoing CPD on ethical use, bias awareness, and effective AI integration in teaching, learning and school organisation
- Staff model responsible AI use and guide pupils accordingly

9. Policy Review and Acknowledgement

- This policy will be reviewed annually to reflect changes in legislation, guidance, and technology.
- Any concerns about AI use should be reported to school leadership or the IT department.
- This document was structured and summarised with assistance from ChatGPT, an AI language model developed by OpenAI.

Policy author/s	RP: Director of Digital Learning and Deputy Head Academic SSq: Director of Digital Learning Prep: Deputy Head (Academic) Trust: Director of Digital Technology
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The Francis Holland Schools Trust is an educational charity which manages three leading independent girls' schools in central London, across three sites.
Registered charity number: 312745 Registered office: Francis Holland Schools Trust, 35 Bourne Street, London SW1W 8JA