FHS
Francis Holland Schools

AI (Artificial Intelligence) Policy

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Artificial Intelligence (AI) Policy

This policy applies to:
Francis Holland Regent's Park Francis Holland Sloane Square Francis Holland Prep

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

Related Policies:

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

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:

- Department for Education (DfE) guidance 'Generative AI Product Safety Expectations' (Jan 2025), 'Using AI in education: support for school and college leaders' (June 2025) and 'Keeping Children Safe in Education' (Sept 2025) regarding safeguarding and online safety,
- The DfE's Filtering and Monitoring Standards, and Cybersecurity Standards for Schools and Colleges,
- Crime and Policing Bill (June 2025), introduced a new criminal offence that criminalises AI models that have been optimised to create Child Sexual Abuse Material (CSAM),
- UK GDPR (2021), Data Protection Act (2018),
- Copyright, Designs and Patents Act (1988),
- Joint Council for Qualifications (JCQ) 'AI Use in Assessments' (2025),
- 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, including UK data protection legislation UK GDPR (DPA) and The Children's Code. 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

- Educational Benefit: AI must support learning with demonstrable academic value.
- Fairness & Accessibility: AI should promote inclusion and not disadvantage any pupil.
- Safety & Security: Risk assessments and cybersecurity protocols protect users. Only adopt AI tools where the educational benefits clearly outweigh the risks.
- Privacy & Data Protection: Use of AI must comply with data protection regulations including the UK GDPR, with clear data handling policies.
- Oversight: AI assists, but does not replace, professional judgment with human oversight.
- Transparency: Pupils, parents and staff should understand how AI tools work and how decisions are made.
- Academic Integrity: AI must not be used to plagiarise or circumvent learning.
- Bias & Limitations: AI-generated content must be critically evaluated for accuracy and fairness.
- Environmental Sustainability: AI tools should be assessed for long-term environmental and social impact.

4. Roles and Responsibilities

4.1 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

4.2 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)

4.3 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

4.4 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.

4.5 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

4.6 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

5. Implementation Guidelines

5.1 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 (Appendix D). 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 (Appendix D), staff may proceed with their trial. The Director of Technology will perform a DPIA if deemed necessary.

5.2 Data Management

While current AI tools do not process large datasets, we uphold data protection standards. Any tools involving logins or data sharing are assessed to ensure GDPR compliance and user privacy. Further details are available in the Data Protection Policy.

5.3 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.

5.4 Monitoring and Evaluation

We evaluate AI's impact on teaching, leadership, and administration through annual reviews, feedback from the school community, and reference to the AI Implementation Plan Template (Appendix B).

5.5 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)

6. AI in Teaching, Learning and Assessment

6.1 Age Limits and Parental Consent

Pupil use of AI should take account of the age limits for platforms and the requirement to obtain parental consent in some situations. 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 is given in the list of AI platforms in the appendices. 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.

6.2 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.

6.3 Plagiarism

It is plagiarism to represent AI generated work as your own. This applies to all work undertaken at school including homework and external assessments. Plagiarism may be sanctioned following the relevant school policies.

6.4 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 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.

6.5 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 directed by their teacher

6.6 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

Generative AI might usefully be used by pupils to:

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

6.7 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.

7. 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:

- Annual 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

8. 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 SSq: Director of Digital Learning Prep: Deputy Head (Teaching and Learning) Trust: Director of Digital Technology
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Approved by	SLTs June 2025
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Next review	Summer 2026

Reference: OpenAI, ChatGPT 4, https://openai.com/chatgpt, 25 March 2025.

The Francis Holland Schools Trust is an educational charity which manages three leading independent girls' schools in central London, across three sites.
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Appendix 1: Pupil AI Use Agreement

Responsible, Safe and Fair Use of AI Tools

At Francis Holland Schools, we believe AI (Artificial Intelligence) can support your learning, creativity, and future career — but it must be used responsibly and ethically. By signing this agreement, you confirm that you understand and agree to follow the school's rules on AI use.

What You Can Expect from Us:

- Guidance: You will be taught how to use AI safely and effectively.
- Support: Staff will help you understand AI's risks and benefits.
- Protection: Your personal data and privacy will be protected.
- Fairness: AI will not be used to make decisions about your future.

Your Responsibilities as a Pupil:

- You must clearly reference any AI-generated content used in your work, including the name of the tool, the date it was used, and its purpose, using referencing style (i.e MHRA or APA).

You MUST:

- Use AI tools only when permitted by your teacher.
- Think critically about AI-generated content – don't accept it blindly.
- Cite any AI use in your work (tool, date, purpose).
- Keep a record (screenshot or PDF) of prompts and AI responses used in assignments.
- Follow JCQ rules on AI use in assessments and coursework.

You MUST NOT:

- Copy or reword AI content without saying it came from AI.
- Use AI to complete work for you or avoid real learning.
- Submit fake references or facts made up by AI.
- Share personal data with AI tools unless approved by the school.

Remember:

AI is a tool, not a shortcut. Use it to support your learning — not replace it.

By signing below, I agree to follow the school's AI guidelines and use AI responsibly.

Pupil Name: _____ Form: _____

Signature: _____ Date: _____

Parent/Guardian Signature (if under 16): _____

Appendix 2: AI Tools in Use at Francis Holland Regent's Park

The following AI and AI-assisted tools are currently (Sept 2025) in use at Francis Holland Regent's Park, organised by recommended minimum age for pupil use. Age recommendations reflect appropriate supervised use.

On an ongoing basis, the definitive list of approved AI tools is held centrally on the school SharePoint for staff to refer to. This list will be updated centrally, as & when AI tools are approved by the Director of Technology and introduced into the school. If an AI tool is not on this list it must not be used.

Tool	**Description**	**Recommended Age Group**
Canva for Education	Design tool with AI-assisted layout, text suggestions, and templates	Y7+
Seneca Learning	Learning AI-powered revision platform with adaptive quizzes	All KS3-KS5
Sparx	Personalised AI-driven maths homework platform	KS3 Maths
Desmos	Interactive graphing calculator with smart tools	KS£+ Maths
Grammarly (Edu)	Writing assistant offering grammar, tone, and structure suggestions	Y9+
ChatGPT	Generative AI chatbot for writing, problem solving, and idea generation	Y10+ (supervised), Sixth Form (independent)
Turnitin AI Detection	Detects AI-generated and plagiarised content in assessments	All exam year groups (as needed)
Quillbot	AI tool for rewording and summarising	Sixth Form (supervised use)
Copilot (Microsoft)	Embedded in Office 365, supports writing and summarising	Sixth Form (limited use)
Bing AI	Microsoft search assistant with generative AI integration	Sixth Form (with guidance)
Perplexity	AI search engine combining citation and summary functions	Sixth Form (with citation training)
DeepAI	Open-source generative image and text tools	Sixth Form (research projects only)
Google Gemini	Google's generative AI suite	Staff only (pilot phase)
SLT AI	Internal Trust tool for leadership/admin support	Staff only

Appendix 3: AI Tools in Use at Francis Holland Sloane Square

The following generative and AI-assisted tools are currently (Sept 2025) in use at Francis Holland Sloane Square, grouped by function and ordered by age suitability. Age recommendations reflect appropriate supervised use.

On an ongoing basis, the definitive list of approved AI tools is held centrally on the school SharePoint for staff to refer to. This list will be updated centrally, as & when AI tools are approved by the Director of Technology and introduced into the school. If an AI tool is not on this list it must not be used.

Tool	**Description**	**Recommended Age Group**
Design & Creativity		
Canva for Education	AI-powered design suggestions and generation tools	Y7+ (teacher-guided use)
Assessment & Feedback		
Quizziz	Gamified quiz platform with AI question generation	All years (KS3–KS5)
Sparx Maths	Personalised AI-driven maths homework platform	KS3 Maths
Century Tech	Adaptive learning platform using AI to personalise questions and content	KS3+
Other / General Tools		
Raspberry Pi Experience AI	Curriculum tools introducing AI programming concepts	KS3 (enrichment or clubs)
BBC Micro:bit AI Tools	Introductory AI and coding experiments	KS3 (STEAM activities)
Grammarly	AI writing and grammar assistant	Y9+
Google Teachable Machine	Builds basic AI models using custom training data	Y10+ (STEAM enrichment)
Internet Geography	Subject site using AI to support explanations and quizzes	KS4+ Geography
Turnitin	Plagiarism detection with AI-generated content detection	Exam years (as needed)
Generative AI		
Chat GPT	Text-based AI chatbot for writing, reasoning, and brainstorming	Y10+ (supervised), Sixth Form (independent)
Copilot (Microsoft)	Embedded in Microsoft 365 to support writing and productivity	Sixth Form (supervised)
GitHub Copilot	AI pair-programming assistant integrated in code editors	Sixth Form (STEM subjects only)

Staff Only Tools		
Gemini (Google)	Generative AI tools integrated into Google Workspace	Staff only (pilot)

Apple Intelligence	Integrated AI features on Apple devices	Staff only (pilot)
Magic School AI	AI resource and lesson planning generator for teachers	Staff only
Chalkie	AI assistant for classroom tasks and feedback generation	Staff only
GPTZero	Detects AI-generated writing	Staff only
Twee.com	AI for generating lesson content, questions, and tasks	Staff only
ExamPro	Exam platform using AI to generate and mark questions	Staff only
Curriculum Press	Uses AI to adapt curriculum resources	Staff only

Appendix 4: AI Tool Evaluation Checklist for School Leaders

1. Safety and Security
☐ The tool has robust data protection measures in place
☐ It complies with the GDPR and other relevant data protection regulations
☐ There are clear terms of service regarding data usage and storage

2. Educational Value
☐ The tool aligns with our curriculum and educational goals
☐ It has demonstrable benefits for teaching and/or learning
☐ There is evidence of its effectiveness in educational settings
☐ The tools uses data from reputable educational sources (e.g., DfE, ISI, EEF)

3. Transparency and Explainability
☐ The AI's decision-making process can be explained to stakeholders
☐ The tool provides clear information about its capabilities and limitations
☐ There is transparency about the data used to train the AI

4. Personalisation Capabilities
☐ The tool can incorporate school-specific information
☐ There are features for personalising outputs based on individual school contexts
☐ The personalisation process is transparent and controllable by the school

5. Creator's Background and Educational Expertise
☐ The creator(s) have significant experience in education (e.g., former teachers, headteachers)
☐ The development team includes educators or educational consultants
☐ There's evidence of ongoing collaboration with current educators

6. Understanding of Educational Context
☐ The creators demonstrate knowledge of current educational policies and practices
☐ There's evidence of understanding the day-to-day challenges in schools
☐ The tool reflects an awareness of diverse educational needs and contexts

7. Human Oversight
☐ The tool allows for human intervention and override of AI decisions
☐ It clearly delineates between AI-generated content and human input
☐ There are clear protocols for staff to review and validate AI outputs

8. Workload Impact
☐ The tool has the potential to reduce staff workload
☐ The time investment for implementation and training is reasonable
☐ It integrates well with our existing systems and workflows

9. Intellectual Property Considerations
☐ The tool's use of data for training purposes is clearly stated
☐ There are options to opt-out of contributing to the AI's training data
☐ The ownership of content created using the tool is clearly defined

10. Support and Training
☐ Adequate training resources are available for staff

☐ There is ongoing technical support from the provider
☐ The provider offers regular updates and improvements to the tool

11. Cost-Effectiveness
☐ The cost of the tool is justifiable given its benefits
☐ There is a clear understanding of any ongoing or hidden costs
☐ The tool offers good value compared to alternative solutions

Total Score: ____ / 34

Evaluator's Name: _____ Date of Evaluation: _____

Recommendation:
☐ Proceed with implementation
☐ Needs further evaluation
☐ Not recommended for use

Comments:
Any additional comments: