

Appendix: Artificial Intelligence (AI) – Data Protection Considerations

As Artificial Intelligence (AI) tools become more common in education, the school recognises its duty to ensure their use is fully compliant with the UK General Data Protection Regulation (UK GDPR) and aligned with our safeguarding responsibilities. This appendix outlines how we manage AI use with regard to the processing of personal data.

1. Purpose and Scope

This guidance applies to all staff, governors, and third-party providers who may interact with AI tools or systems as part of school activities. It covers any AI technologies, including:

- Generative AI (e.g. tools that create text, images, or video).
- Predictive tools (e.g. analytics software).
- Automated marking or feedback systems.
- Any AI features embedded within digital platforms used by the school.

2. Key Safeguards for Pupil Data

To protect pupils and their data, the following rules apply:

a. Age Restrictions

- **Pupils will not have access to any generative AI tool or platform that has an age restriction above their current age**, including 13+, 16+, or 18+ rated tools.
- Staff must verify the suitability and age-appropriateness of any tool used in the classroom.

b. No Personal Data Shared with AI Models

- **No personal data about pupils will be entered into or shared with any AI model**, regardless of whether it is hosted on a school device, cloud-based, or externally provided.
- This includes:
 - Full names
 - Contact information
 - Photographs or videos
 - Identifiable written work or behaviour data
 - Health, SEND or safeguarding information

If AI is used in any school system, it must be fully assessed for data protection compliance and explicitly configured to exclude identifiable pupil information.

3. Legal Basis and GDPR Principles

Any AI use involving school-held data must comply with the seven principles of the UK GDPR, including:

- **Lawfulness, fairness and transparency:** The school must inform individuals if AI is used to process their data.
- **Purpose limitation & data minimisation:** AI tools must only use the minimum data required for clearly defined educational purposes.
- **Accuracy & accountability:** All outputs must be reviewed by staff; AI must not be used to make unsupervised decisions.
- **Integrity and confidentiality:** AI services must meet the school's security and data hosting standards (e.g. UK/EU servers).

4. Staff Responsibilities

Staff must:

- Only use AI tools approved by the school leadership and DPO.
- Avoid entering any personal, confidential or sensitive information into AI systems.
- Review and verify any AI-generated content before sharing or using it in the classroom.
- Seek advice from the **Data Protection Officer (DPO)** before using new AI tools, especially those involving pupil interaction or data.

5. Third-Party AI Tools and Providers

Before adopting or trialling any AI-enabled service, the school will:

- Conduct a **Data Protection Impact Assessment (DPIA)** where personal data may be processed.
- Ensure data processing agreements are in place.
- Confirm that data will not be used to train or improve external AI models unless fully anonymised and legally compliant.

6. Automated Decision-Making

The school does **not** use AI to make decisions about individuals without human involvement.

Where AI is used to inform teaching or administrative actions, final decisions will always be made by staff.

7. Ongoing Oversight and Review

- AI use will be monitored by the **DPO and Online Safety Lead** to ensure compliance and identify new risks.
- This appendix will be reviewed annually or as AI usage in education evolves.

Support and Resources

- **Data Protection Officer (DPO):** [Insert name/contact]
- **Safeguarding/Online Safety Lead:** [Insert name/contact]
- ICO AI Guidance: <https://ico.org.uk/for-organisations/ai/>
- DfE Data Protection Toolkit: <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>