



## Artificial Intelligence (AI) – Privacy Notice Addendum

This addendum should be read alongside the school's main Privacy Notice. It explains how personal information may be used where the school permits the use of approved Artificial Intelligence (AI) tools or AI-enabled features.

### Our current approach to AI

The school permits authorised staff to use approved AI tools and AI-enabled features for defined teaching, administrative, communication and leadership purposes. Only services that have been assessed and approved by the school may be used with school information or through school-managed accounts.

### How approved AI may be used

Where the school permits approved AI use, authorised staff may use it as a support tool to help prepare teaching resources, draft or improve routine communications and documents, summarise ordinary information, organise actions, improve accessibility or readability, translate content and support other appropriate school tasks. AI is intended to assist staff and does not replace their professional judgement or responsibility.

### Personal information and integrated AI tools

Depending on the service and how it has been configured, an approved AI tool may process information entered into a prompt or selected by a member of staff. Where AI is integrated into a managed service such as Microsoft 365 or Google Workspace, it may also be able to work with documents, emails, files, communications and online meetings that the signed-in member of staff is already permitted to access. This may include approved transcription, AI-generated meeting notes, summaries and action points where those features have been assessed and approved by the school.

We will use anonymous or non-identifying information wherever this will achieve the purpose. Where personal information is necessary, staff must use only the minimum information reasonably required for the task.

### Information we do not routinely use with general-purpose generative AI

Unless a proposed use has been separately assessed and specifically approved, staff must not use general-purpose generative AI tools with highly sensitive or confidential information such as:

- safeguarding or child-protection records;
- detailed health, medical or Special Educational Needs and Disabilities (SEND) information;
- criminal offence information, allegations or confidential pastoral information;
- detailed family circumstances, complaints or legal advice;
- staff grievance, disciplinary, capability or other highly confidential employment information; or
- financial account information, passwords, security credentials or similar confidential security information.

Approved online meeting recording, transcription or AI note-taking may sometimes involve sensitive or highly confidential information, including safeguarding, SEND, health, complaints, allegations or employment matters. These features will only be used where the school has assessed the proposed use, considers it necessary and proportionate, and has appropriate access, security, retention and human-review controls in place.

### Checks before AI is used with personal information

Where the school permits AI use involving personal information, we will only use an AI service where appropriate checks have been completed. Depending on the proposed use, these may include:

- confirming that the tool and proposed use have been approved by the school;
- identifying the lawful basis for the underlying school activity;
- completing supplier due diligence and putting appropriate contractual and security safeguards in place;
- carrying out a Data Protection Impact Assessment (DPIA) where required;
- confirming appropriate data-residency and international-transfer arrangements
- understanding how prompts, responses and generated content are retained or deleted; and
- providing appropriate guidance and training to staff.

## Public and personal AI accounts

Personal information must not be entered into unapproved public or consumer AI services. Where the school has approved an integrated AI service, staff must use the school-managed organisational account and the approved version of the service.

## Accuracy, fairness and human oversight

AI-generated information may be inaccurate, incomplete or biased. Outputs will therefore be treated as drafts and checked by an appropriately knowledgeable member of staff before they are relied upon, communicated or added to an official school record. Where AI-generated meeting notes, summaries or action points are created, they will be checked by an authorised person before they are relied upon, circulated or added to an official school record.

General-purpose generative AI tools will not be used to make or recommend significant decisions about individuals, including decisions concerning admissions, attainment, behaviour, exclusion, safeguarding, recruitment, discipline, pay, capability or performance. We do not use these tools to profile, score, rank or predict individuals or to make solely automated decisions with legal or similarly significant effects.

## AI service providers, data location and international processing

Where an approved AI provider processes personal information on our behalf, it will normally do so as a data processor under contractual data protection terms. The school will consider the provider's security, use of subprocessors, retention arrangements, data-residency controls and any international transfers as part of its due diligence and DPIA process.

For integrated services such as Microsoft 365 or Google Workspace, the school will rely on its professional IT provider/IT Manager to confirm that the relevant organisational licence, tenant settings and data-residency arrangements have been correctly configured. A data-residency commitment does not necessarily mean that every processing activity takes place only in the UK or EEA, so any applicable international transfer safeguards will also be considered.

## Our lawful basis

The lawful basis for processing personal information through an AI-enabled tool will normally come from the underlying school activity rather than from the use of AI itself. For example, the same lawful basis may apply whether an authorised member of staff prepares a routine school communication manually or uses an approved AI tool to assist with its preparation.

## Retention and your rights

Where prompts, responses, transcripts, AI-generated meeting notes, summaries or other generated content are retained as part of the school's records, they will be managed in accordance with the school's retention arrangements and may be relevant to data protection rights requests. Your rights are explained in the school's main Privacy Notice.



## Changes to our use of AI

AI services and their features can change over time. We will review new or materially changed uses before using them with personal information and will update this privacy notice addendum where necessary. The latest version will be available on the school's website.

## Further information and contact details

Further information about the school's approved use of AI is available in our Artificial Intelligence Policy which can be viewed [here](#). If you have questions about how the school uses personal information, please contact Plymouth CAST [admin@plymouthcast.org.uk](mailto:admin@plymouthcast.org.uk).

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