Oxford Diocesan Schools Trust
St Mary's Convent
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www.odst.org.uk

Central:	Trust-wide, applicable at trust and school levels. Schools may not make any changes or adaptations

Privacy Notice
Artificial Intelligence (AI)

Approved by:	**Estates & Safeguarding**
Date:	**November 2025**
Next review date:	**November 2026**

Introduction

Oxford Diocesan Schools Trust is committed to using artificial intelligence (AI) safely, responsibly, and in compliance with data protection law. This privacy notice explains how we use AI tools, what personal data may be processed, and how we protect your information.

The Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 (DUAA) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

What is AI and How Do We Use It?

Generative AI takes a written prompt and runs it through an algorithm to generate new, 'natural'-seeming content – i.e. that seems like it was created by a person, not a computer. We will not use personal data or sensitive information in publicly available generative AI tools.

Predictive AI analyses data to predict future outcomes. we might use this to identify pupils in need of early support to ensure the best outcomes for each child.

Adaptive Learning Systems are AI-powered platforms that tailor educational content and adapt to an individual pupil's learning style and progress.

Automated Administrative Tools are used to automate routine tasks such as scheduling, managing timetables, or grading certain types of assignments.

We may use AI tools to:

- Support administrative tasks (e.g., creating communication templates, planning documents)
- Enhance teaching and learning resources
- Assist with assessment and feedback processes
- Support staff workload reduction
- Improve operational efficiency

We maintain a list of approved AI tools that have been risk-assessed for use within our trust. Staff and pupils may only use tools included on this approved list.

What Personal Data Might Be Processed?

When using AI tools, we may process:

- **Staff data:** Names, work email addresses, professional development information
- **Pupil data:** Educational information, assessment data (only where specifically approved and necessary)
- **Parent/carer data:** Contact details for communication purposes

Lawful Basis for Processing

Under the UK GDPR we must have a lawful basis to process your personal data.

Our primary lawful basis for processing personal data through AI tools is **public task**– we are processing data to carry out our core educational functions such as teaching, assessing pupil progress or for safeguarding purposes.

How We Protect Your Data

We take the following measures to ensure your data is protected when using AI:

Data Protection Impact Assessments (DPIAs) The UK GDPR and DUAA requires a DPIA for any processing that is likely to result in a high risk to individuals' rights and freedoms. These assess the risks of using specific AI tools and identify measures to mitigate them. This is always required for automated decision making and for using AI with children's data.

Data Minimisation We only process the minimum amount of personal data necessary for the specific purpose.

Transparency We will be transparent about how and why we are using AI and where decision is made with the help of AI we will explain the logic involved and its significance.

Security We have robust security measures in place to protect your personal data from unauthorised access, loss or damage.

Approved Tools Only All AI tools used within our trust must be vetted to ensure they:

- Have appropriate security measures
- Are transparent about data processing
- Comply with UK data protection law
- Have clear privacy policies

Intellectual Property and Consent

Intellectual property is protected by copyright law, which is different to data protection law. It includes any original work created by a person, such as:

- Essays, homework or any other materials written or drawn by a pupil (not multiple-choice questions)
- Lesson plans created by a teacher
- Prompts entered into generative AI tools

We will seek appropriate consent to collect and store this information where required, or use AI tools that do not store or collect information for commercial purposes.

Safeguarding

Our safeguarding procedures comply with Keeping Children Safe in Education and apply to all AI use, and we have appropriate filtering and monitoring in place.

Special category data

Special category data includes sensitive information such as health data, racial or ethnic origin and biometric data. We will only process special category data using AI when we have an additional legal condition to do so, such as for reasons of substantial public interest (e.g. safeguarding children) or with explicit consent.

Transparency and Accountability

We are committed to:

- Being transparent about our AI use
- Ensuring staff understand when and how AI is being used
- Training all staff on safe and responsible AI use
- Regularly reviewing our AI tools and practices
- Correcting any errors or bias in AI outputs

Your Rights

Under data protection legislation you have the right to request access to information about the personal data we hold.
You also have the right to:

- *Rectification* of inaccurate data
- Right to *erasure* in certain circumstances
- Right to *restrict processing*, if you believe data held by the trust is inaccurate
- Right to *object* to personal date being used for marketing

To exercise any of these rights, please contact our Data Protection Officer.

Data Retention

Personal data processed through AI tools will be retained in accordance with our data retention schedule and will not be kept longer than necessary.

Third-Party AI Tools

When we use third-party AI tools, we ensure:

- They have appropriate data processing agreements in place
- They comply with UK data protection law
- Data is processed securely
- The provider's privacy notice is written in easy-to-read language and tells you:
    - The type of data collected
    - Why and how the data is collected, processed, stored and shared by the generative AI system
    - Where data will be processed, and whether there are appropriate safeguards in place if this is outside the UK or EU

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at Make a complaint | ICO

Contact:

If you would like to discuss anything in this privacy notice, please contact:

ODST Data Protection Officer, Julian Hehir
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