

# PAGS

## AI Use in the Workplace

### Policy & Guidance Framework

|                    |                                                                                                    |
|--------------------|----------------------------------------------------------------------------------------------------|
| Person Responsible | Felicia Jibson — CEO, PAGS                                                                         |
| Created            | June 2026                                                                                          |
| Review Date        | June 2027                                                                                          |
| Version            | 1.0                                                                                                |
| Applies To         | All staff, contractors, and partners using AI tools in connection with PAGS or its school partners |

## 1. Vision, Values and Purpose

“Artificial Intelligence should empower professionals to do their best work — not replace their judgement. At PAGS, we believe that responsible AI use means keeping people at the centre of every decision.”

PAGS is committed to harnessing the potential of Artificial Intelligence (AI) to improve outcomes for learners, reduce administrative burden, and support the professionals who work with them. We are equally committed to ensuring that AI is used safely, transparently, and in a manner that upholds the rights and dignity of every learner — particularly those with Special Educational Needs and Disabilities (SEND).

This policy provides a framework for the responsible use of AI tools in the workplace. It applies to all staff, contractors, and third parties acting on behalf of PAGS or its school partners. It is intended as a living document, to be reviewed annually in line with the rapid development of AI technology and evolving regulatory guidance.

Our approach to AI is grounded in the following values:

- Human oversight — AI informs; professionals decide.
- Transparency — we are open about how and when AI is used.
- Data protection — learner privacy is non-negotiable.
- Equity — AI must not disadvantage any learner or group.
- Continuous learning — we invest in AI literacy as an ongoing professional commitment.

## 2. Scope and Application

This policy applies to the use of any AI-powered tool, system, or feature — whether standalone or embedded within an existing platform — that is used in connection with:

- The delivery of educational services to school partners
- The processing, analysis, or generation of content relating to learners
- Internal administration, communication, or decision-making
- Training, demonstration, or research activities conducted on behalf of PAGS

It covers both AI tools provided by PAGS (including AI features within the PAGS platform) and any third-party AI tools used by staff in the course of their work.

This policy applies regardless of whether the AI tool is accessed on a work device, a personal device, or a school partner's system. If it involves PAGS data or PAGS work, this policy applies.

### 3. The Seven Pillars of Responsible AI Use

The following pillars form the foundation of PAGS's approach to AI in the workplace. All staff are expected to understand and apply these principles in their day-to-day use of AI tools.

|                                    |                                                                                                                                                                                                                       |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Purpose Limitation</b>       | AI tools must be used only for clearly defined, approved purposes. Staff must understand what each tool is designed to do — and equally, what it must not be used for.                                                |
| <b>2. Human Oversight</b>          | AI outputs must always be reviewed by a qualified professional before informing any decision, recommendation, or communication. AI assists; it does not decide.                                                       |
| <b>3. Data Minimisation</b>        | Staff must not input personal, sensitive, or confidential data into any AI tool not explicitly approved by the organisation. This includes learner names, SEND details, health information, and safeguarding records. |
| <b>4. Transparency</b>             | Staff should be open about when and how AI has assisted their work, particularly in professional reports, assessments, or communications to families and external agencies.                                           |
| <b>5. Approved Tools Only</b>      | Only AI tools that have undergone appropriate review (including a Data Protection Impact Assessment where required) may be used with real data. New tools must not be adopted informally.                             |
| <b>6. Training &amp; Awareness</b> | AI literacy is treated as an ongoing professional requirement, not a one-off event. Staff must understand both the capability and the limitations of AI tools they use.                                               |
| <b>7. Special Category Data</b>    | Heightened obligations apply to health, SEND, ethnicity, and other special category data. Such data must never be processed through unsanctioned AI tools under any circumstances.                                    |

### 4. Approved AI Tools

Only AI tools that appear on the approved list below may be used with real data relating to learners, staff, or school partners. This list is maintained by the PAGS Data Protection Lead and reviewed at least annually.

| Tool / Platform          | Permitted Use                                       | Authorised Users    | Data Processing Confirmation             |
|--------------------------|-----------------------------------------------------|---------------------|------------------------------------------|
| PAGS Platform            | Learner data, IEPs, assessments, progress tracking  | All school staff    | Yes — contractually bound; DPIA in place |
| Microsoft Copilot (M365) | Administrative drafting, scheduling, internal comms | Approved staff only | Yes — subject to Trust M365 agreement    |
| [Tool Name]              | [Approved use]                                      | [Role]              | [Status]                                 |

Using an unapproved AI tool with real learner data is a serious data protection breach and will be treated as a disciplinary matter. If you are unsure whether a tool is approved, ask before you use it.

## 4.1 Requesting Approval for a New Tool

Any staff member who wishes to use a new AI tool in connection with their work must:

- Submit a request to the Data Protection Lead before use
- Provide details of the tool's data processing practices, including its privacy policy and any sub-processors
- Allow sufficient time for a Data Protection Impact Assessment (DPIA) to be completed where required
- Await written confirmation of approval before using the tool with any real data

Approval is not guaranteed and will depend on the nature of the tool, the data it processes, and its contractual terms.

# 5. AI and Learner Data

The protection of learner data is a legal obligation under UK GDPR and the Data Protection Act 2018. It is also a moral responsibility — particularly in relation to learners with SEND, where data is often sensitive, complex, and deeply personal.

## 5.1 What Staff Must Never Do

Staff must never:

- Input a learner's name, identifying information, or SEND details into a general-purpose AI tool (e.g. ChatGPT, Google Bard, or any consumer AI chatbot) unless the tool is on the approved list
- Use AI to generate or amend safeguarding records, referrals, or reports without explicit human review and sign-off
- Rely solely on AI-generated content in any assessment, IEP, or professional report without independent verification
- Share AI outputs containing learner data with third parties without appropriate authorisation

## 5.2 The PAGS Platform and AI

The PAGS platform incorporates AI-powered features designed specifically for educational use. These features are built in compliance with UK GDPR, operate on Microsoft Azure (West Europe region), and use Microsoft Presidio pseudonymisation techniques to protect learner identity within AI processing pipelines.

A Data Protection Impact Assessment (DPIA) covering AI features within the PAGS platform is maintained and made available to school Data Protection Officers on request.

AI features within PAGS are designed to assist professionals — they surface insights and support decision-making, but they do not replace the expertise, professional judgement, or safeguarding responsibility of the humans using them.

## 6. Human Oversight and Professional Accountability

A core principle of this policy is that AI does not remove professional accountability. Regardless of how an output was generated, the professional who uses, shares, or acts on it remains responsible for its accuracy, appropriateness, and impact.

This means:

- Every AI-generated report, letter, or recommendation must be reviewed and, where appropriate, amended by a qualified professional before use
- Staff should apply the same critical judgement to AI outputs as they would to information from any other source
- If an AI output appears incorrect, biased, or inappropriate, it must not be used and should be reported to the relevant line manager
- No automated decision that significantly affects a learner may be made by AI alone — human review is always required

“Would I be comfortable if the family of this learner could see exactly what AI tool I used, what data I entered, and what I did with the output?” If the answer is no, reconsider your approach.

## 7. Training and AI Literacy

AI literacy is treated as an ongoing professional development priority at PAGS, not a one-off induction item. Staff are expected to develop and maintain a working understanding of the AI tools they use, their limitations, and the risks associated with misuse.

### 7.1 Required Training

- All new staff must complete PAGS AI Awareness training before using any AI tool in connection with their work
- Annual refresher training is required for all staff with access to AI-enabled features

- Staff with specific data protection responsibilities must complete additional training on AI and GDPR compliance

## 7.2 Ongoing Development

- PAGS will provide regular updates on changes to AI tools, policy, and regulation
- Staff are encouraged to share learning, concerns, and questions through line management and team meetings
- PAGS will monitor developments in AI regulation and best practice, updating this policy as required

## 8. Roles and Responsibilities

All members of the PAGS team share responsibility for upholding this policy. Specific responsibilities are set out below.

| Role                    | Responsibility                                                          |
|-------------------------|-------------------------------------------------------------------------|
| CEO / Senior Leadership | Policy ownership, annual review, approval of new AI tools               |
| Data Protection Lead    | DPIA oversight, third-party AI processor agreements, breach response    |
| IT / Platform Lead      | Technical onboarding of approved tools, access controls, audit logging  |
| Line Managers           | Staff compliance, incident escalation, training completion monitoring   |
| All Staff               | Day-to-day compliance, reporting concerns, completing required training |

## 9. Monitoring and Incident Reporting

PAGS will monitor compliance with this policy through a combination of:

- Regular audits of AI tool usage and access logs
- Annual staff surveys on AI use and confidence
- Review of any incidents or near-misses involving AI tools
- Feedback from school partners and their Data Protection Officers

### 9.1 Reporting a Concern or Incident

Any staff member who suspects a breach of this policy, or who has concerns about how AI is being used, should report this promptly to their line manager and the Data Protection Lead. Suspected data breaches involving AI tools will be handled in accordance with the PAGS Data Breach Response procedure.

There is no penalty for raising a concern in good faith. Early reporting of a potential breach is always preferable to delayed disclosure, and staff will be supported through the process.

## 10. Reviewing this Policy

This policy will be reviewed annually by the CEO and the Data Protection Lead, or sooner in the event of:

- Significant changes to the AI tools used by PAGS or its school partners
- Material changes to UK GDPR or ICO guidance on AI
- A data incident involving AI tools that necessitates a policy update
- A significant change in the nature or scale of PAGS's operations

Staff will be notified of any material changes to this policy and updated training will be provided where necessary.

## 11. Concerns and Complaints

Concerns about the application of this policy, or about the use of AI within PAGS or a school partner, should be raised in writing with the Data Protection Lead in the first instance. If the concern remains unresolved, it may be escalated to the CEO.

Where a complaint relates to the processing of personal data, individuals also have the right to raise a concern with the Information Commissioner's Office (ICO) at [ico.org.uk](https://ico.org.uk).

## Appendix A: Quick Reference — AI Do's and Don'ts

| ✓ DO                                                                           | ✗ DO NOT                                                                   |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Use only approved AI tools for work-related tasks                              | Use personal or consumer AI tools with learner data                        |
| Review all AI outputs before acting on them                                    | Submit AI-generated content without human review                           |
| Report concerns about AI use to your line manager                              | Assume an AI output is accurate without checking                           |
| Complete required AI literacy training                                         | Use a new AI tool before it has been approved                              |
| Apply the same professional standards to AI-assisted work as to any other work | Input learner names, SEND details, or sensitive data into unapproved tools |
| Ask if you are unsure whether something is permitted                           | Share AI outputs containing personal data without authorisation            |

## Document Sign-Off

| Name                | Signature | Date |
|---------------------|-----------|------|
| Felicia Jibson, CEO |           |      |