

Artificial Intelligence (AI) Policy

ProvisionIQ Ltd — How We Use AI Safely, Ethically, and Under Human Control

Document	Artificial Intelligence (AI) Policy
Company	ProvisionIQ Ltd (“ProvisionIQ”, “we”, “us”, “our”)
ICO Reg. No.	ZC156305
Version	1.0
Effective Date	September 2026
Next Review	September 2027, or sooner if any AI feature, provider, or legal requirement changes
Policy Owner	Data Protection Officer · dpo@provisioniq.org
Applies to	All AI-assisted features of the ProvisionIQ platform, and all schools, trusts, staff, parents/carers, and pupils whose information is processed by them
Compliance	UK GDPR · Data Protection Act 2018 · DfE Generative AI in Education guidance · SEND Code of Practice (0–25) · Cyber Essentials Plus · ISO 27001:2022
Related Policies	Privacy Policy (Policy 18, Version 2.0) — in particular Section 9, Artificial Intelligence

Our Commitment: AI Supports Professionals — It Never Replaces Them

ProvisionIQ uses artificial intelligence to save school staff time and to help them think more broadly about the needs, outcomes, and support that could make a difference for a child with special educational needs and disabilities (SEND). AI in ProvisionIQ only ever **suggests**. It never decides. Every suggestion must be reviewed and actively accepted, edited, or rejected by a member of staff before it becomes part of any pupil’s record. The knowledge, relationships, and professional judgement of the people who know the child, teachers, SENCOs, specialists, parents/carers, and the child themselves, always come first.

Version	Date	Summary of Changes
1.0	September 2026	Initial AI Policy published. Sets out our ethical principles, the five AI-assisted features, the information each one uses, how personal information is protected, human oversight requirements, and school and staff responsibilities. Includes a plain-English summary for parents/carers (Appendix A).

1. Purpose of This Policy

This policy explains where and how ProvisionIQ uses artificial intelligence (AI), what information AI is given, what it produces, and the protections we have put in place. It is written for the schools and trusts who use ProvisionIQ, the staff who use its AI features day to day, and the parents/carers and pupils whose information is held on the platform.

This policy has three aims:

- **Transparency**- to be completely open about what AI does and does not do in ProvisionIQ, so that schools can explain it confidently to their own communities.
- **Ethical use**- to set out the principles that govern every AI feature we build, with the best interests of the child at the centre.
- **Human control**- to make clear that AI is a tool to support professional judgement, never a substitute for it, and that accountability for every decision about a child remains with people.

This policy should be read alongside our Privacy Policy, which sets out how we handle all personal data on the platform. Where this policy goes further than the Privacy Policy, for example by describing individual AI features in detail, the two are intended to be read together.

2. Our Ethical Principles for AI

Every AI feature in ProvisionIQ is designed, tested, and reviewed against the following principles. A proposed feature that cannot meet all of them will not be released.

Principle	What It Means in Practice
Human judgement first	AI provides suggestions only. A qualified member of staff reviews every output and decides what, if anything, to keep. No AI output enters a pupil's record without a person actively choosing to accept it.
The child's best interests	AI is used only where it helps staff plan better support for children with SEND. It is never used to label, rank, profile, or make judgements about a child.
Transparency	AI suggestions are clearly labelled as AI-generated when they are shown for review. Nothing generated by AI is saved or acted upon until a user has reviewed and accepted it. Once accepted, the content is the user's own record and professional responsibility. We keep an audit record showing that a suggestion originated from AI, so organisations can check it if needed. Schools, staff, and families can always find out which features use AI and what information they use.
Data minimisation	Direct identifiers are removed automatically where they can be detected, and staff review free text and documents before they are sent.

Principle	What It Means in Practice
Fairness and inclusion	AI outputs can reflect bias or make generic assumptions. Staff are asked to check that suggestions are appropriate to the individual child, their culture, language, and circumstances, and to reject anything that is not.
Co-production	AI never replaces the voice of the pupil or their parents/carers. Person-centred planning, as set out in the SEND Code of Practice, remains the responsibility of the school and family working together.
Accountability	Every use of AI is logged and auditable. Responsibility for decisions about a child always sits with the school and its staff, never with the technology.
Safety and security	AI features are subject to a Data Protection Impact Assessment (DPIA), security testing (including prompt-injection testing), and usage limits before and after release. Free-text descriptions and uploaded documents are shown to the user for review before anything is submitted, so they can check that no identifying information remains and remove it if it does.
Proportionality	AI is switched on only where a school chooses to use it. Schools can use ProvisionIQ fully without any AI features at all.

Professional Judgement Is Not Optional

AI does not know the child. It has never met them, observed them in class, spoken with their family, or read the full history of their support. It can be wrong, incomplete, generic, or confidently stated but inaccurate. Staff must treat every AI suggestion as a starting point for their own thinking, to be checked against the evidence, their knowledge of the pupil, and the views of the pupil and their family, never as an answer.

3. Who Provides Our AI

ProvisionIQ uses a single AI provider: **Anthropic**, the developer of the **Claude** family of AI models. We do not use any other AI provider anywhere in the product. Anthropic acts as a sub-processor to ProvisionIQ and is subject to security due diligence before onboarding and annual review, in line with our supplier security controls.

Area	Our Position
AI provider	Anthropic (Claude models) – is the only AI provider used in ProvisionIQ
Model training	Anthropic does not use the information we send it to train its AI models, and we have not given it permission to. ProvisionIQ itself does not use pupil data to train, fine-tune, or evaluate any AI model.

Area	Our Position
What is sent	Only the limited, user reviewed free text along with statistical non-PII data used for reporting. Outlined in Section 5. Anthropic deletes the information within 30 days of receiving it. It may keep it longer only if the content is flagged as a possible usage policy violation (up to 2 years) or where the law requires. During that time it may be accessed by Anthropic for safety and security purposes.
Where AI processing happens	Anthropic processes this information outside the United Kingdom. Our Anthropic workspace stores data in the United States, and processing may take place in other countries where Anthropic operates. Only the limited information described in Section 5 is sent. Transfers are protected by the UK Addendum to the EU Standard Contractual Clauses, which forms part of our Data Processing Addendum with Anthropic.
Storage of pupil records	All pupil records, including any AI suggestions that staff accept, are stored in ProvisionIQ on UK-based servers, as set out in our Privacy Policy.
Change of provider	We will not add or change an AI provider, or move to a model with different data handling terms, without completing a DPIA and notifying all schools and trusts that have AI features enabled before the change takes effect.

4. Who Can Access AI Features

A school will only see an AI feature if it has been turned on for that school.

- The school or trust, as Data Controller, decides whether AI features are used. Enabling AI is a decision for the school's leadership and Data Protection Officer, not for individual users.
- Within a school, AI features are available only to authorised staff with the appropriate role. The school-level inspection readiness summary (Section 5.4) is available only to school leaders, such as headteachers and SENCOs.
- Parents/carers, pupils, and external professionals using the Parent Portal or multi-agency workspace do not have access to AI features.
- A school or trust can ask for AI features to be switched off at any time by contacting us. Switching AI off does not affect any records already saved.

5. Where AI Is Used in ProvisionIQ

There are five places in ProvisionIQ where AI is used today. In every one of them, AI only ever **suggests**: a member of staff must actively choose to accept, edit, or reject what it produces before it becomes part of a pupil's record. Each AI screen carries an on-screen reminder that the content is AI-generated and must be reviewed carefully before it is relied upon.

5.0 At a Glance

Feature	What AI Receives	What AI Never Receives
5.1 Suggesting outcomes from identified needs	Type of need, a short description, and its severity	Names, dob, who recorded the need, or when
5.2 Suggesting needs and outcomes from a written description	Staff's free-text description of how the pupil presents, after automatic removal of names and other identifiers and a staff review	The pupil's name (automatically removed), dob, emails, phone numbers, NHS numbers
5.3 Suggesting support (provision)	Categories of need, and titles of existing outcomes and provision	Names or any personal details of the pupil
5.4 School inspection readiness summary	School-wide statistics and counts only	Any information about an individual pupil
5.5 AI Document Import (EHCPs and support plans)	The text of an uploaded plan, after automatic removal of identifiers and a staff review	Pupil name, date of birth, NHS number, email addresses, phone numbers

5.1 Suggesting Outcomes from a Pupil's Identified Needs

When a member of staff has recorded what a pupil needs support with, they can ask AI to suggest possible outcomes (goals) for that pupil's support plan. AI is given only the details of the identified needs: the type of need, a short description, and how significant it is. Names, dates, and other identifying details are removed before the staff member reviews and confirms final text to be sent and details such as who identified the need and when are never sent at all. Staff review each suggestion and choose what, if anything, to keep, editing it as needed so that it is specific, meaningful, and right for the individual child.

5.2 Suggesting Needs and Outcomes from a Written Description of the Pupil

A member of staff can write a free-text description of how a pupil presents day to day, and ask AI to suggest needs and outcomes based on that description. Before anything is sent:

- Identifying details, including **names**, dates, email addresses, phone numbers, and NHS numbers, are automatically detected and removed.
- The member of staff is then shown the de-identified text and asked to **review it before it is submitted**. This allows them to catch anything the automatic check may have missed, such as nicknames, shortened names, alternative or misspelt names, or details that could identify a child in context (for example, a very unusual circumstance or a named sibling).
- Only once the member of staff confirms the text is it sent to the AI provider.

Even with these safeguards, staff should describe the pupil's needs and presentation **without** including names or identifying details of the pupil, their family, or colleagues. As with all features, every suggestion is reviewed by a person before anything is saved.

5.3 Suggesting Support (Provision) for a Pupil

Once a pupil's needs and outcomes are recorded, staff can ask AI to suggest suitable types of support. AI is given only the categories of need and the titles of existing outcomes and provision already in place, no names or personal details. A member of staff reviews each suggestion and decides whether it is appropriate, realistic, and available for that pupil in their setting before choosing what to accept.

5.4 School-Level Inspection Readiness Summary

School leaders (such as headteachers and SENCOs) can ask AI to produce a written summary of how ready the school appears to be for an Ofsted-style SEND inspection. This is based entirely on school-wide statistics and counts, for example, the percentage of pupils with an up-to-date plan, how consistently reviews are being completed, and how actively staff are using the system. **No pupil names or other personal details are ever sent for this feature, only aggregated numbers.**

The output includes a written summary, an overall readiness rating (red/amber/green), strengths, areas for improvement, questions an inspector might ask, and a short improvement plan. Unlike the other features, this summary is saved and displayed to school leaders when they next visit the page, rather than being a one-off suggestion. It remains clearly labelled as AI-generated.

This Summary Is Not an Ofsted Judgement

The readiness summary is an AI-generated reflection tool based only on the data recorded in ProvisionIQ. It is not produced, endorsed, or validated by Ofsted, and it does not predict the outcome of any inspection. It cannot see the quality of teaching, the experience of pupils and families, or anything not recorded in the platform. Leaders should use it as a prompt for professional discussion and self-evaluation, alongside their own knowledge of the school.

5.5 AI Document Import (Building an ISP from an Uploaded Plan)

Staff can upload an existing Education, Health and Care Plan (EHCP) or support plan, in Word (.docx) or PDF format, and ask AI to read it and suggest content for the pupil's Individual Support Plan (ISP). This helps staff avoid re-typing information that already exists, whether for a new pupil or one with an existing ISP.

Step	What Happens
1. Upload	A member of staff uploads a .docx or PDF plan for a specific pupil.

Step	What Happens
2. Remove identifiers	The text is extracted and identifying details, pupil name, date of birth, NHS number, email addresses, and phone numbers, are automatically removed where automatically identified. Dates that relate to targets and outcomes are kept, because they are needed to make useful suggestions.
3. Staff review	The member of staff then views and edits the text before it is sent, so they can remove anything else that should not be shared.
4. AI reads the plan	The de-identified text is sent to the AI provider, which suggests a learner profile (such as strengths, interests, and communication preferences), needs, outcomes, and provision. For a new pupil it may suggest a starting tier of support; for a pupil with an existing ISP it flags suggestions that may duplicate what is already recorded.
5. Accept, edit, or reject	Every suggested item is shown on a review screen. Staff accept, edit, or reject each item individually. Nothing is added to the ISP unless a member of staff chooses to add it.

A Human Still Decides What Goes into the ISP

Nothing an EHCP or support plan says about a child is saved to their record just because AI has read it. EHCPs often contain sensitive information, including health and social care needs. While direct identifiers are removed before the text is sent, the descriptive content of the plan is shared with the AI provider, because that is what it needs to read. Schools should take this into account in their own DPIA and privacy information. Any suggested tier of support is a starting point for professional discussion only — decisions about the level of support a child receives are always made by people.

6. What AI Does Not Do

AI in ProvisionIQ Never...	Why This Matters
Makes a decision on its own	Every AI suggestion requires a person to review and actively accept it before it affects a pupil's record. No automated decision with legal or similarly significant effects is ever made about a pupil (UK GDPR Article 22).
Communicates with pupils or parents/carers	AI is never used to write to, message, or interact directly with pupils or families. All communication comes from people.
Makes or informs safeguarding decisions	AI is never used for safeguarding, and has no access to safeguarding records, concern flags, or referrals.
Controls access or security	AI plays no part in logging in, permissions, or deciding who can see what.
Has general access to school data	AI sees only the specific, limited information described for each feature in Section 5. It cannot browse, search, or retrieve anything else.

AI in ProvisionIQ Never...	Why This Matters
Profiles, ranks, or labels children	AI is not used to score, rank, predict outcomes for, or categorise individual pupils, or to compare pupils with each other.
Learns from your pupils	Pupil information is never used to train or improve AI models, by us or by Anthropic.
Replaces statutory processes	AI does not replace EHC needs assessments, annual reviews, the graduated approach (assess, plan, do, review), or any statutory duty held by schools or local authorities.

7. How We Protect Personal Information Sent to AI

We apply several layers of protection before any information reaches our AI provider:

Safeguard	Detail
Field-level minimisation	Structured information (such as recorded needs) is deliberately limited to only the fields needed to make a useful suggestion. Details such as who identified a need and when are never sent.
Automatic removal of identifiers	Common identifying details are automatically detected and removed before sending, including names, NHS numbers, dates of birth and other dates (except where needed for targets), email addresses, and phone numbers.
Staff review before sending	Where staff write free text or upload a document, they are shown the de-identified text and can review and edit it before it is sent, to catch nicknames, alternative spellings, or contextual details that automatic checks may miss.
Aggregate-only data	The inspection readiness summary receives only school-wide statistics and counts, never anything that could identify an individual pupil.
Encryption	All information sent to the AI provider is encrypted in transit.
No training use	Information sent to Anthropic is not used to train AI models. Anthropic keeps it for a limited period only (see Section 3).
Security testing	AI features are included in our annual independent penetration test and are tested for prompt-injection and misuse, as part of our Cyber Essentials Plus and ISO controls.

De-identified Is Not the Same as Anonymous

Removing names and identifiers significantly reduces risk, but in a small school community a detailed description of a child's needs could, in rare cases, still allow someone who knows the child to recognise them. For this reason, we treat all information sent to AI as personal data and protect it accordingly, and we ask staff to include only what is needed to get a useful suggestion.

8. Human Oversight, Accountability, and Audit

8.1 Human Review

Every AI output must be reviewed by a member of staff before it is used. The platform is designed so that AI suggestions cannot be saved to a pupil's record automatically: staff must actively accept, edit, or reject each one. Accepted content becomes the member of staff's professional record, and they are accountable for it in the same way as anything they write themselves.

8.2 Labelling

AI suggestions are clearly labelled as AI-generated when they are shown for review, and every AI feature carries an on-screen reminder that its output must be reviewed carefully before it is relied upon. Once a member of staff accepts a suggestion it becomes their own record and is no longer labelled as AI-generated; the audit trail records that it started as an AI suggestion.

8.3 Audit Logging

Every time a member of staff asks for AI suggestions, we record who made the request, when, for which pupil and support plan, which feature was used, and which model responded. We also record how much text was processed. This is written to the school's audit trail and to a separate AI usage log that ProvisionIQ uses to monitor usage and cost. These records do not contain a copy of what was sent to the AI or what it returned. When staff accept a suggestion, the resulting change to the pupil's record is recorded in the normal audit trail under that member of staff's name, in the same way as anything they write themselves. AI request records are kept for [retention period, see below], as set out in our Privacy Policy.

8.4 Usage Limits

We apply limits to how often AI features can be used in quick succession. This keeps the platform responsive for everyone and protects against misuse.

8.5 Governance

- A **Data Protection Impact Assessment (DPIA)** is completed before any AI feature is released or materially changed. Summary DPIA outputs are available to schools and trusts on request from dpo@provisioniq.org.
- Our Data Protection Officer maintains an **AI Register** recording each AI feature, its purpose, the data it uses, its safeguards, and its DPIA status.
- AI features are reviewed at least annually for accuracy, appropriateness, and emerging risks, and whenever we receive feedback that suggests a problem.
- We will notify schools and trusts with AI features enabled **before** introducing a new AI feature or materially changing what information an existing feature uses.

9. Understanding the Limitations of AI

AI is a powerful tool, but it has real limitations that every user should understand:

- **It can be wrong.** AI can produce suggestions that are inaccurate, inappropriate, or not supported by the evidence, and can present them with confidence.
- **It can be generic.** Suggestions may be broad or formulaic. Good outcomes and provision need to be specific, measurable, and personal to the child.
- **It lacks context.** AI only sees the limited information it is given. It does not know the child, their history, their family, or the resources available in your school.
- **It can reflect bias.** AI models learn from large amounts of text, which may contain stereotypes or assumptions. Staff should be alert to suggestions that make assumptions based on a type of need, background, or characteristic.
- **It can misread documents.** When importing a plan, AI may misinterpret tables, formatting, or ambiguous wording, or miss content. Always check suggestions against the original document.

If staff see an AI output that is inaccurate, biased, inappropriate, or concerning, they should reject it and report it to us through the in-platform support route or at dpo@provisioniq.org. Reports are reviewed and used to improve our safeguards.

10. Roles and Responsibilities

Who	Responsibilities
ProvisionIQ	Designs AI features in line with this policy; minimises and de-identifies data before it is sent; completes DPIAs; manages the relationship with Anthropic; maintains audit logs, usage limits, and security testing; labels AI content; notifies schools of changes; investigates reports and incidents.
Schools and trusts (Data Controllers)	Decide whether to enable AI features; consider AI use in their own DPIA; update their privacy notice to explain AI use to parents/carers and staff (Appendix A may help); ensure staff are trained and understand this policy; retain accountability for all decisions about pupils.
School leaders and SENCOs	Set expectations for how AI is used in the school; ensure AI suggestions are quality-assured as part of normal SEND processes; use the inspection readiness summary as a prompt for self-evaluation, not as a judgement.
Staff users	Follow the staff guidance in Section 11; review every AI suggestion carefully; accept only what is accurate and appropriate; take professional responsibility for all content saved to a pupil's record; report concerns.

11. Guidance for Staff Using AI Features

Do	Do Not
Treat every suggestion as a draft to be checked, improved, or discarded	Accept suggestions without reading them properly
Check suggestions against the evidence, the original documents, and what you know about the child	Assume an AI suggestion is correct because it sounds professional
Describe needs and presentation factually, without names	Type names, nicknames, or identifying details of pupils, families, or colleagues into free-text fields
Carefully review the de-identified text shown to you before sending it	Skip the review step before submitting text or a document
Make outcomes and provision specific and personal to the child	Copy generic suggestions into a plan unchanged
Involve the pupil and their parents/carers in shaping the plan	Use AI output in place of the pupil's or family's voice
Reject and report anything inaccurate, biased, or inappropriate	Use AI for anything related to safeguarding

12. Incidents and Concerns

If personal information is sent to an AI provider when it should not have been (for example, a name that was not removed), or an AI feature behaves in an unexpected or harmful way, this is handled under our Incident Response Plan. We will:

- Investigate promptly and take steps to contain the issue, including suspending the affected feature if necessary. Notify the affected school or trust (as Data Controller) without undue delay, so that they can meet their own obligations.
- Give the school the information it needs to decide whether to report to the ICO within 72 hours.
- Record the incident, learn from it, and improve our safeguards.

Schools, staff, parents/carers, and pupils can raise any question or concern about our use of AI with our Data Protection Officer at dpo@provisioniq.org. You also have the right to complain to the ICO at ico.org.uk or on 0303 123 1113.

13. Review of This Policy

This policy is reviewed at least annually by our Data Protection Officer. It will also be reviewed and updated before any new AI feature is released, if we change or add an AI provider, if what information an existing feature uses changes materially, or if relevant law or government guidance changes. The current version is always available at provisioniq.org/policies.

Our Promise

We will only use AI in ways that we would be comfortable explaining to any parent, carer, or pupil. If we cannot explain it clearly, we will not do it.

Appendix A- AI in ProvisionIQ: A Plain-English Summary for Parents and Carers

Schools may use or adapt this summary in their own privacy information for parents/carers.

How Your Child's School Uses AI in ProvisionIQ

Your child's school uses ProvisionIQ to plan and track the support your child receives for their special educational needs. Some features of ProvisionIQ use artificial intelligence (AI) to help staff with this work.

What AI does: it suggests ideas to staff, for example, possible targets for your child's support plan or types of support that might help. It can also read an existing plan, such as an EHCP, and suggest what to include in your child's school support plan, so that staff do not have to type everything again.

What AI does not do: it does not make any decisions about your child. A member of staff who knows your child must check every suggestion and decide whether to use it, change it, or reject it. AI never contacts you or your child, and it is never used for safeguarding.

Your child's information: before anything is sent to the AI, your child's name and other identifying details, such as their date of birth and NHS number, are removed. The AI is provided by a company called Anthropic, which does not use this information to train its AI.

Your voice still matters most: AI does not replace conversations between you, your child, and the school. Your views and your child's views remain central to planning their support.

Questions? Speak to your child's school or SENCO first. You can also contact ProvisionIQ's Data Protection Officer at dpo@provisioniq.org.

Appendix B — Key Terms

Term	Meaning
Artificial intelligence (AI)	Computer software that can produce text, such as suggestions or summaries, in response to information it is given.
AI provider	The company whose AI model processes information for us, for ProvisionIQ, this is Anthropic.
De-identified	Information from which names and other direct identifiers have been removed. It is still treated as personal data.
DPIA	Data Protection Impact Assessment- a formal assessment of the privacy risks of a feature and how they are controlled.
EHCP	Education, Health and Care Plan- a legal document describing a child's special educational needs and the support they require.
ISP	Individual Support Plan- the pupil's support plan within ProvisionIQ.
Provision	The support, interventions, or adjustments put in place for a pupil.

Term	Meaning
Human in the loop	The principle that a person reviews and approves every AI output before it is used.

Version History

Version	Date	Author	Changes
1.0	September 2026	DPO	Initial AI Policy: ethical principles (§2); AI provider (§3); access controls (§4); five AI-assisted features including AI Document Import (§5); limits on AI use (§6); data protection safeguards including automatic name removal and pre-submission staff review (§7); oversight, audit, and governance (§8); limitations of AI (§9); roles and responsibilities (§10); staff guidance (§11); incident handling (§12); plain-English summary for parents/carers (Appendix A)