**AI Governance Policy**

**Secondary School AI Governance Policy**

**(Module 2 Portfolio Entry)**

**Version**: *1.0*  
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**1. Purpose**

This policy outlines how our school governs the use of Artificial Intelligence (AI) tools in line with legal obligations (EU AI Act, GDPR and DSA) and our commitment to ethical, inclusive and student-centered education. It defines responsibilities, documentation standards, oversight mechanisms and risk management procedures.

**2. Scope**

This policy applies to all AI systems used within the school by staff, students or third-party providers, including but not limited to:

* Google Workspace tools (e.g. Gemini for Education, Google Meet)
* ChatGPT
* Learning management systems with AI-based features
* AI-assisted assessment and feedback tools

**3. Definitions**

* **AI Ethics**: Moral principles guiding AI use, such as fairness, transparency, accountability, and inclusiveness.
* **Responsible AI**: The practice of aligning AI use with ethical standards and legal obligations.
* **AI Governance**: The systems and policies that ensure AI is safe, lawful, and aligned with school values.

**4. Governance Structure**

| **Role** | **Responsibility** |
| --- | --- |
| Head of School | Overall accountability for AI governance |
| AI Oversight Committee | Monitors AI tools, risk classification, policy compliance |
| IT & Data Protection Lead | Ensures security, GDPR compliance, and tool evaluation |
| Teachers | Apply ethical use, ensure human oversight, report concerns |
| Safeguarding Lead | Reviews student impact and risks related to vulnerable learners |

**5. Legal and Ethical Alignment**

This policy supports compliance with:

* **EU AI Act** - Especially Articles 5-7, 9, 14, 16-18, and Annex IV
* **GDPR** - Including Articles 5, 6, 9, and 12-14 (transparency and child data protections)
* **Digital Services Act (DSA)** - Ensuring platform accountability and protection of minors
* **Safeguarding Best Practices** - In line with national child protection standards

**6. Risk Classification & Audit**

AI systems are categorised as:

* **Minimal Risk** (e.g., Google Docs grammar suggestions)
* **Limited Risk** (e.g., chatbots in homework platforms)
* **High Risk** (e.g., AI detecting cheating, grading assistance, admissions screening)

High-risk tools must be:

* Documented using the AI Inventory Template
* Reviewed annually
* Subject to human oversight
* Communicated transparently to users (staff, students, parents)

**7. Procurement and Approval**

All new AI tools must go through the following steps:

1. Risk classification
2. Data protection impact review
3. Safeguarding assessment
4. Governance Committee approval

**8. Monitoring and Incident Response**

* Ongoing monitoring is led by the Oversight Committee and teaching staff
* Any AI-related incidents must be documented and reported within 24 hours
* Incident logs are reviewed termly

**9. Training & Capacity Building**

* Staff will receive annual AI governance training
* Students will receive age-appropriate instruction on AI literacy
* Parents will be informed through meetings and newsletters

**10. Review and Updates**

This policy will be reviewed annually or in response to major legal or technological changes.