**Module 2: Governance Policy Draft**

**AI Governance Policy - Draft (Portfolio Submission)**

**Institution Name**: *INS Premià de Mar (Barcelona, Spain)*  
**Date**: 01 September 2025  
**Prepared by**: *Maria-Antònia Guardiola*  
**Role**: AI Governance Officer (Trainee)

**1. Purpose of this Policy**

This AI Governance Policy outlines our school’s approach to managing Artificial Intelligence (AI) systems in a way that aligns with:

* Ethical principles
* Legal obligations (EU AI Act, GDPR, DSA)
* Our educational mission and safeguarding responsibilities

It is intended to ensure AI use is transparent, inclusive, accountable, and safe for all stakeholders (especially students aged 12-18).

**2. Scope**

This policy applies to:

* All AI tools used by staff, students, or administrators
* School-managed platforms (e.g., Google Workspace, Gemini, ChatGPT, learning analytics)
* Third-party AI services embedded in educational tools

**3. AI Governance Structure**

| **Role** | **Responsibility** |
| --- | --- |
| *Headteacher* | Final approval of AI policies and oversight of implementation |
| *IT Manager* | Technical assessment, data security and vendor compliance |
| *Designated Safeguarding Lead* | Monitors child safety and age-appropriate use |
| *AI Committee (to be formed)* | Reviews AI risk classifications, ethics alignment and audits |
| *Teachers & Staff* | Daily oversight, reporting concerns, ethical use in classrooms |

**4. AI Ethics Principles**

We commit to applying the following **seven AI ethics principles** to all AI tools used:

1. **Fairness**: AI tools must not discriminate or create unjust outcomes.
2. **Transparency:** Students and families must be informed when AI is used.
3. **Accountability:** Human decision-makers remain responsible for outcomes.
4. **Privacy**: Data must be handled lawfully and securely.
5. **Human Oversight**: Humans must review AI-generated decisions.
6. **Safety**: Tools must not cause harm, especially to vulnerable students.
7. **Inclusiveness**: AI must support equitable learning for all.

**5. Risk Classification Process**

All AI tools will be classified as:

* **Minimal Risk** (e.g. AI grammar checkers)
* **Limited Risk** (e.g. student chatbots)
* **High-Risk** (e.g. grading algorithms)
* **Prohibited** (e.g. facial/emotion recognition)

High-risk tools must be documented using the AI Inventory Template, reviewed regularly, and include human oversight at all decision points.

**6. Communication & Transparency**

* We will provide age-appropriate **AI notices** to students and parents
* Staff will receive **training** on responsible AI use
* An AI Transparency Statement will be posted on the school website

**7. Review and Monitoring**

* This policy will be reviewed **annually** or after significant tool updates
* AI tools will be audited for ethical and legal compliance
* Staff can raise concerns via a designated feedback mechanism