**The Legal Foundations of Transparency**

**Reflection Assignment**

**(Module 6A)**

**Reflection Checkpoint: Evaluating High-Risk AI Tools and Transparency Compliance**

**AI Tool Selected:** *MagicSchool AI*  
**High-Risk Classification (Annex III 3(b), EU AI Act):**  
MagicSchool AI is used in educational settings to assist with student learning, assessment feedback, and planning. As it can impact student evaluation and performance monitoring, it falls under Annex III 3(b) as a high-risk system.

**Article 13 Notice Requirements vs. Vendor Documentation:**

| **Requirement** | **Status in Vendor Documentation (Module 5)** | **Gap Analysis** |
| --- | --- | --- |
| **Purpose of the System** | Partially present. Stated as a teacher productivity and lesson design assistant. | Needs clearer articulation of all educational use cases and boundaries. |
| **Logic and Functionality** | Broadly described (uses large language models). No detailed logic flow or technical documentation shared. | Significant gap. Vendor should provide a simplified model card or technical explanation suitable for educators. |
| **Performance Limits** | Not clearly stated. No formal documentation of accuracy, limitations, or scope of validity. | Major gap. Should include disclaimers on areas of unreliability or where human oversight is essential. |
| **Foreseeable Risks** | No risks are described in marketing or support documentation. | Complete gap. Vendor should outline potential misuse risks or bias concerns. |
| **Data Sources Used** | General claim of using proprietary and public education datasets. No specifics. | Requires clarification. The data sources should be clearly identified and their relevance explained. |
| **Human Oversight Expected** | Implied that teacher remains in control. No explicit guidance on required oversight practices. | Needs improvement. A formal notice describing how educators must supervise, edit or validate AI output should be included. |

**Recommendations:**

- Request detailed technical documentation or a Model Card from MagicSchool AI covering logic, performance limits and data sources.  
- Draft a local Article 13-compliant notice summarizing the tool’s use for students and staff.  
- Follow up with vendor on explicit risks and ensure inclusion of human oversight expectations.  
- Ensure alignment with GDPR Articles 12-14 by drafting a transparency notice that also covers lawful basis, rights, and data storage limits.  
  
**Conclusion:**MagicSchool AI qualifies as a high-risk system. While some transparency elements are met, additional documentation and clarifications are needed to fully comply with Article 13 of the EU AI Act and GDPR. Institutional responsibility includes bridging these gaps by obtaining or producing compliant materials.