



Artificial Intelligence – Data Protection

We process pupil data under UK GDPR Article 6(1)(e) — Public Task — because these tools form part of the school's core educational provision. This is the same lawful basis under which we operate platforms such as Google Classroom.

If you would prefer your child not to use Learning Compass, please contact the school office and we will discuss alternative arrangements. More broadly, parents retain the right to object to processing under UK GDPR, which should be directed to our Data Protection Officer via the school office.

Area	Detail
Data collected	Pupil name, year group, class, school email, text inputs (chat queries, answers), and teacher-uploaded images of handwritten work. Where camera or microphone features are used, data is processed transiently for the learning task only. No biometric or location data is collected.
AI provider	Google Gemini API (paid Enterprise tier), operating under Google's Cloud Data Processing Addendum (CDPA) with Standard Contractual Clauses and the UK Extension to the EU-US Data Privacy Framework.
AI training	Pupil data is not used to train Google's AI models. This is a legally binding contractual commitment.
Data storage	All persistent data (accounts, chat logs, progress, feedback) is stored in Google Cloud Firestore, configured to the UK/EEA region (europe-west2).
AI processing	Transient only. Text and images are held in memory for the few seconds needed to generate a response, then discarded. Processing takes place on Google's global infrastructure under the legal safeguards set out above.
Encryption	Data encrypted in transit (TLS 1.3) and at rest (AES-256).
Access Control	Learning Compass restricted to @keswicksch.co.uk accounts. Teacher dashboard access controlled via role-based permissions. Pupils cannot view each other's work.
Retention	Pupil data is retained for the duration of the pupil's enrolment at Keswick School to support continuity of learning, progress tracking, and revision across key stages. Data is deleted when the pupil leaves the school. Records can also be deleted on request at any time.
Lawful basis	UK GDPR Article 6(1)(e) — Public Task. Safeguarding monitoring additionally relies on Article 9(2)(g) — Substantial Public Interest (DPA 2018 Schedule 1, Part 2, Para 18).



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