

AI Risk Register

(School Perspective)



Risk Area	Risk Description	Likelihood	Impact	Suggested Controls
Safeguarding	Pupils exposed to AI-generated harmful content, deepfakes or nudification imagery	High	High	Update safeguarding policies, DSL training, incident reporting
Safeguarding	Pupils forming unhealthy reliance on AI companions/chatbots	Medium	High	Staff awareness training, pupil guidance, monitoring and education
Online Safety	AI-assisted cyberbullying and harassment	High	High	Behaviour policy updates, digital literacy programmes, reporting channels
Data Protection	Pupil data used by AI suppliers beyond intended educational purpose	Medium	High	DPIAs, supplier due diligence, contract reviews
Data Protection	Unauthorised use of pupil data for AI model training	Medium	High	Procurement controls, privacy assessments, contractual safeguards
Compliance	Use of AI tools that are not approved or risk assessed	High	Medium	AI register, procurement approval process
Teaching & Learning	Hallucinated or inaccurate AI outputs used in teaching	High	Medium	Staff guidance, verification expectations, AI use policy
Equality	Biased AI outputs disadvantaging vulnerable or protected groups	Medium	High	Equality impact assessments, human oversight
SEND	AI tools not accessible or suitable for SEND learners	Medium	High	Accessibility reviews, SEND consultation
Assessment	Staff relying on AI outputs without professional judgement	Medium	High	Human-in-the-loop requirements, moderation processes
Reputation	Public concern arising from unsafe or inappropriate AI use	Medium	High	Communications plan, governance oversight
Cyber Security	AI tools increasing exposure to phishing, credential leakage or data breaches	High	High	Security training, approved systems only
Governance	Lack of defined accountability for AI decisions	Medium	High	Board AI governance framework, named executive lead
Staff Capability	Staff lack confidence and understanding of AI risks	High	Medium	Mandatory training and CPD
Student Capability	Pupils lack understanding of misinformation, manipulation or privacy risks	High	Medium	AI literacy curriculum
Procurement	AI suppliers provide limited transparency on data processing and safeguards	Medium	High	Enhanced supplier due diligence
Wellbeing	AI-driven pressure, misinformation or dependency affecting pupil wellbeing	Medium	High	Mental health support, AI awareness education
Strategic	Trust adopts AI faster than governance and controls develop	High	High	Annual AI assurance reviews and risk reporting

Suggested Board-Level Risk Appetite Statement

The Trust recognises the educational benefits of artificial intelligence but has a low-risk appetite for AI-related harms affecting safeguarding, pupil wellbeing, privacy, equality, inclusion and statutory compliance. All AI deployment should be subject to appropriate governance, human oversight and child-centred risk assessment.