



PROCUREMENT PACK

# AI Transparency Statement

What the AI does, what it decides, what it gets wrong, and where a teacher stays in charge. Written to be checked, not admired.

|                            |                   |
|----------------------------|-------------------|
| VERSION                    | EFFECTIVE FROM    |
| 1.0                        | 23 September 2026 |
| AUDIENCE                   | OWNER             |
| School leaders, DSLs, DPOs | Acarise Ltd       |
| NEXT REVIEW                | CLASSIFICATION    |
| 23 September 2027          | Public            |

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## 1. What the AI actually does

Acarise uses large language models from OpenAI in four distinct places. Naming them separately matters, because they carry different risks.

| Where                        | What it does                                                                                                                                         | Who sees the output                             |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <b>Activity generation</b>   | Turns the teacher's one-sentence objective into a content plan, draft material for three activity types, and five learning objectives with criteria. | The teacher, who edits it before anyone sees it |
| <b>The tutor</b>             | Holds the written conversation with the student.                                                                                                     | The student, live, and the teacher afterwards   |
| <b>The progress analyser</b> | After each exchange, judges the current objective against its criteria and sets it to Not started, In progress or Met, with a confidence score.      | Both, live                                      |
| <b>Quiz generation</b>       | Writes the five questions and four options for a quiz objective.                                                                                     | The student                                     |

### QUIZ MARKING IS NOT AI

Quizzes are generated by AI but marked by ordinary code against a stored answer key, on our server. The mark is deterministic. The pass mark is fixed at 80%.

## 2. What it decides, and what it does not

The strongest claim the platform makes about a student is that a learning objective is “Met”, with a confidence score. That is a judgement made by a language model reading a conversation.

### NO DECISION WITH LEGAL OR SIMILAR EFFECT

Acarise produces no grade that counts, no formal academic result, no report-card entry, no setting or streaming decision, and nothing that goes to an awarding body. Under Article 22 of the UK GDPR there is no solely automated decision with legal or similarly significant effects on a learner.

What Acarise produces is **evidence for a teacher**: this is what the student wrote, this is what the platform made of it, this is the confidence. The teacher reads it and decides what it means. Every judgement in the product opens onto the conversation that produced it.

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### 3. Where it gets things wrong

Being specific about failure modes is more useful than a disclaimer.

#### **The tutor can state something false**

Confidently and fluently. This is inherent to language models and we cannot engineer it away. Every conversation therefore carries the line: “AI-generated responses may contain inaccuracies. Always verify with trusted sources.”

#### **The analyser can mark an objective Met too early**

A student who writes plausibly without understanding may satisfy it. The confidence score and the full conversation are shown so a teacher can check.

#### **The analyser can fail to mark a student who does understand**

Particularly a student who writes briefly, or who has difficulty expressing themselves in writing. This is a real equity concern for pupils with SEND or with English as an additional language, and a teacher should watch for it.

#### **Generated questions can be ambiguous or wrong**

The teacher sees and can edit the activity material, but not the quiz questions, which are generated when the student reaches them.

#### **It does not recognise distress**

The tutor is not trained to spot a safeguarding disclosure and will not escalate one. See section 5.

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## 4. Where the human stays in charge

| Decision                     | Who makes it                                                 |
|------------------------------|--------------------------------------------------------------|
| What is taught               | The teacher writes the objective.                            |
| What the material says       | The teacher edits the generated draft before assigning it.   |
| Which objectives are tracked | The teacher ticks, removes, regenerates or writes their own. |
| How each is assessed         | The teacher chooses Written or Quiz per objective.           |
| How the tutor behaves        | The teacher sets tone, teaching style and behavioural rules. |
| Who gets the activity        | The teacher.                                                 |
| What the results mean        | The teacher, reading the evidence.                           |
| Whether a student needs help | The teacher. Nothing is escalated automatically.             |

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## 5. Safeguarding and the AI

### STATED PLAINLY

Acarise does not scan student messages for signs of harm and raises no alert when a student writes something concerning. A disclosure made to the tutor is stored like any other message and nobody is notified. A feature to flag concerning exchanges to the teacher is being built and is not yet available.

The control that exists today is that a teacher can read every message a student sends, search it, and export it. Our Safeguarding Policy sets out what a school should put in place around that.

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## 6. What happens to what students write

- Conversation content is sent to **OpenAI** to generate each reply. Under the agreement in force, API content is not used to train their models.
  - A copy of each request and response is recorded in **Langfuse** (EU) so faults can be diagnosed and quality monitored. This includes student messages.
  - **No student data is used to train or fine-tune any model**, by us or by anyone else.
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- Where a school provisioned the student, the school is the data controller.

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## 7. How we keep track of it

- **Every prompt is versioned.** We can say exactly what the model was instructed to do on any given date.
- **Every AI call is traced.** When a school reports that the tutor said something wrong, we can retrieve what was asked and what came back.
- **Behavioural rules are set per activity** by the teacher and constrain the tutor's responses — including whether it gives answers directly.
- **The model is named, not hidden.** We use OpenAI models; if we change provider we will update this statement.

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## 8. What Acarise is not

- Not a replacement for a teacher, and not designed to work unsupervised.
- Not an assessment system. Nothing it produces counts towards a qualification.
- Not a safeguarding or wellbeing monitoring tool.
- Not a source of truth. It is a way of practising, explained by something that has read a lot and is sometimes wrong.

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## 9. Questions we expect, answered

### Can a pupil be profiled by this?

Progress and confidence are recorded per objective, per activity. That is a record of what a pupil has shown in a piece of work — the same category of information as a mark book. It is not combined into a profile, shared, or used for any purpose beyond showing the teacher.

### Can a pupil make the AI say something inappropriate?

A determined pupil may be able to push a language model off its brief. The model provider applies its own safety filtering, and behavioural rules constrain the tutor, but neither is a guarantee. The teacher can read the whole conversation.

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**What if a parent objects to AI being used with their child?**

That is a conversation between the parent and the school, which is the data controller. A school can simply not assign activities to that pupil.

**Can we see what the AI was told to do?**

Ask us. Prompts are versioned and we can share the instructions in force.

VERSION HISTORY

| Version | Date              | Change       |
|---------|-------------------|--------------|
| 1.0     | 23 September 2026 | First issue. |

OWNER

Acarise Ltd

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NEXT REVIEW

23 September 2027

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