

# Willow Learn – School Compliance & Safeguarding Overview

This overview is designed to support UK primary and secondary schools, academies, and trusts in assessing Willow Learn for safe, compliant use with pupils.

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## 1. Product Purpose & Intended Use Statement

Willow Learn is an AI-enabled educational platform designed to support teaching and learning in UK schools. Its intended use is to provide curriculum-aligned, pedagogically grounded scaffolding that supports independent learning while keeping teachers fully in control.

Willow is designed to:

- Support post-lesson learning activities (e.g. revision, practice, guided reflection)
- Provide differentiated support for pupils at varying attainment levels
- Reduce teacher workload related to creating and adapting post-lesson activities
- Provide teachers with insight into pupil understanding and misconceptions

Willow is **not** designed to:

- Replace teachers or human judgement
  - Provide pupils with direct answers or completed work
  - Act as an emotional support tool or counsellor
  - Operate without teacher oversight
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## 2. Safeguarding & Appropriate Use Statement

Willow Learn has been designed in line with UK safeguarding expectations, including *Keeping Children Safe in Education (KCSIE)* and DfE guidance on the safe use of generative AI.

Key safeguarding principles:

- AI interactions are curriculum-bounded and learning-focused
- Outputs are designed to scaffold thinking, not replace it
- Content filtering prevents inappropriate or unsafe material
- Usage is logged and available for teacher review
- Teachers retain full control over when and how Willow is used

Willow avoids anthropomorphism and does not present itself as a human, friend, or authority figure. Pupils are encouraged to seek support from teachers where needed.

Willow is intended to complement existing safeguarding, online safety, and acceptable use policies within schools.

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### 3. Data Protection & Privacy Summary

Willow Learn complies with the UK GDPR and the Data Protection Act 2018. The following would be for a full implementation school-wide, outside of the pilot period.

Key points:

- Schools remain the data controller for pupil and staff data
- Willow acts as a data processor
- Data is stored securely in the UK or approved jurisdictions
- All data is encrypted in transit and at rest
- Personal data is used solely to provide the service
- Pupil and teacher data is **not** used to train commercial AI models
- Clear data retention and deletion policies are in place

A full Data Processing Agreement (DPA) is available upon request.

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### 4. Intellectual Property (IP) Assurance

All intellectual property created by pupils or teachers while using Willow Learn remains the property of the school and/or the individual.

Willow as a platform:

- Does not claim ownership of user-generated content
  - Does not reuse pupil or teacher work for commercial purposes
  - Does not train foundation models on school content without explicit consent
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### 5. Security & Access Controls

Willow Learn employs industry-standard security practices, including:

- Role-based access for teachers, pupils, and administrators

- Secure authentication methods
- Protection against misuse and prompt manipulation
- Regular security updates and monitoring

Security incidents are managed and documented.

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## 6. Monitoring, Logging & Oversight

Willow provides teachers with visibility over pupil engagement and learning patterns, including:

- Interaction summaries
- Identification of common misconceptions
- Indicators of confidence and struggle

Willow is designed to support professional judgement, not replace it.

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## 7. Accessibility & Inclusion

Willow Learn supports inclusive learning and accessibility, including:

- Read-aloud functionality
- Clear, structured language
- Support for differentiated scaffolding

Accessibility features are provided without altering core curriculum expectations.

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## 8. Review & Accountability

Schools should review AI tools annually as part of their safeguarding and data protection processes.

Willow commits to ongoing improvement in line with evolving DfE guidance and best practice