



AI Processing and Transfer Overview

Clarity for Education

Version 1.4

Reviewed: 11 July 2026

Current technical transparency note



Document control	Detail
Version	1.4
Technical review	11 July 2026
Publication status	Current technical transparency note
Review trigger	Any material AI, provider or data-flow change, and at least annually

Purpose and status

This note describes the currently reviewed boundary for Student Radar's public AI tools and the separate position for AI-assisted capabilities inside the authenticated platform. It is not an executed Data Processing Agreement, completed school DPIA or transfer risk assessment.

Student Radar does not make a blanket claim that all AI data is tokenised or that its current OpenAI organisation has Zero Data Retention. The applicable data, purpose, lawful instruction, retention and safeguards must be assessed for the actual capability being used.

Processing contexts

Context	Who initiates it	Data boundary	Decision status
Public Echo	A website visitor selects Interpret.	A bounded tapped phrase and button labels or vocalisations. Echo does not ask for a name.	Produces a short interpretation and speech output; it is not a safeguarding or clinical decision.
Public Sensory Profiler	A visitor selects Generate after choosing catalogue entries.	Generic sensory domain, pattern and behaviour selections only. The API rejects pupil identity, school, SEND status, year group, settings, notes and contextual free text.	Produces advisory drafting and curated strategies; it is not a diagnosis or professional assessment.
Authenticated platform AI	An authorised staff user actively invokes a capability enabled for the school.	Capability-specific and potentially Customer Data. The current feature notice and contractual documents must define permitted inputs before enablement.	Advisory only. A professional reviews the source information and output and remains the decision-maker.

Public Echo data flow

1. The visitor selects AAC buttons and requests interpretation.
2. Student Radar validates the same-origin JSON request, field lengths and body size, and applies the public API rate limit.
3. The server sends a purpose-limited prompt to the OpenAI Responses API with `store=false`.
4. The validated short result is sent to OpenAI's audio speech endpoint to create the requested utterance.
5. Generated text and audio may be cached in volatile server memory for up to 10 minutes, keyed by a SHA-256 digest of the request. The route does not write the request or response to the Student Radar database.



Public Sensory Profiler data flow

1. The visitor selects anonymous sensory catalogue entries and requests generation.
2. Student Radar validates the request schema, size and rate limit. Identity, school and pupil-context fields are not accepted.
3. The server sends the anonymous selections in a purpose-limited prompt to the OpenAI Responses API with `store=false`.
4. Student Radar validates or normalises the provider output. Curated fallback content is used if the provider output cannot be safely accepted.
5. Validated output may be cached in volatile server memory for up to 10 minutes.
6. For PDF rendering, the server issues a separate HMAC-SHA256 token that authenticates the unchanged generated content and expires after 10 minutes. Unsigned, expired, modified or client-authored generated text is rejected. PDF rendering is local and does not make a further OpenAI request.

Because the public tool does not collect year group, setting or self-advocacy context, strategies that require those facts are withheld rather than guessed.

What `store=false` means

Layer	Current position
Model training	OpenAI states that API inputs and outputs are not used to train or improve its models by default unless the organisation opts in.
Responses application state	Echo and Sensory Profiler Responses calls set <code>store=false</code> , so they do not ask OpenAI to retain Responses application state for those calls.
Abuse-monitoring logs	OpenAI states that default abuse-monitoring logs can contain prompts, responses or derived metadata and may be retained for up to 30 days unless a different approved control applies.
Zero Data Retention	Modified Abuse Monitoring and Zero Data Retention require OpenAI approval and configuration. This document does not assert that either is enabled for Student Radar.
Audio speech	Echo uses the audio speech endpoint after interpretation. <code>store</code> is not a parameter for that call; the provider's applicable abuse-monitoring position remains relevant.
Student Radar cache	The 10-minute process-memory cache is an application control. It is separate from provider retention and can disappear earlier if the server process restarts.

Data minimisation and user guidance

- Public-tool users must not enter names, dates of birth, UPNs, contact details, safeguarding narratives or other identifying case information.
- Echo accepts only its bounded phrase fields.
- Sensory Profiler generation accepts catalogue selections only; its PDF route accepts those selections, the unchanged validated result and the unexpired signature.



- Public AI routes do not persist the request or response in the Student Radar database.
- Generated content is advisory and must not be treated as a diagnosis, statutory assessment, legal opinion or automated decision.

International transfer position

The public implementation uses OpenAI's general API domain and does not claim UK-only or EEA-only processing. Provider processing, support and abuse monitoring can involve locations outside the United Kingdom. The applicable OpenAI data-processing terms and transfer safeguards must therefore be considered in the current contractual review.

For an authenticated platform capability, the school should request the current DPA, capability-specific DPIA material, feature notice and Sub-Processor List before enablement.

Sources and contact

- OpenAI API data controls and endpoint retention: <https://platform.openai.com/docs/models/default-usage-policies-by-endpoint>
- OpenAI business/API training position: <https://openai.com/policies/how-your-data-is-used-to-improve-model-performance/>
- Student Radar website Privacy Policy: <https://www.studentradar.com/privacy>

Provider documentation can change. These sources and the implementation must be reviewed after any material integration change.

Questions should be sent to dpo@studentradar.com. Do not include pupil data or confidential case information in the initial message.