# Safeguarding and AI Notetakers

There are significant concerns that popular transcription tools (AI notetakers) record conversations without proper consent and then use the data to train their machine-learning models further. While AI notetakers can boost productivity, they also raise safeguarding, privacy, security, and compliance questions.

## What are AI notetakers?

An automated assistant that uses artificial intelligence to record, transcribe, and summarize meetings or conversations. People activate AI notetakers when joining virtual meetings/training.

Prevalent AI notetakers include:

- Zoom AI Companion
- Microsoft Teams Premium
- Google Meet with Gemini
- Fathom
- Notta
- Otter AI
- Fireflies AI

## The Risks of AI Notetakers

Common concerns include:

- **Consent and Privacy:** Do you check if AI notetakers have joined your meeting? How do you seek consent from all delegates/parties on a call before recording conversations?

- **Data Ownership and Use:** Does the notetaker meet GDPR requirements? Is it included in the school Information Asset Register? Review whether vendors retain recordings, transcripts, and even metadata indefinitely or use them to train AI models. Even when content is deleted, metadata about meetings often remains stored with the vendor. That means sensitive information may influence how the model behaves, and in some cases could even be memorised and reproduced. Where does liability reside if there is a data breach? Can attendees request copies of data relating to them or exercise their right to be forgotten. If there is a Subject Access Request how will data be extracted, reviewed and shared?

- **Security Vulnerabilities:** Consider whether recordings stored in the cloud are secure and properly protected. Is there Multifactor Authentication for people who can access notetakers and the recordings? Can anyone in the school/with an AI Notetaker account access confidential recordings - has this been considered?

- **Confidentiality:** Do conversations include legally protected discussions (e.g., about complaints or safeguarding concerns)?

- **Reputational Exposure:** Many notetaker will produce a summary of the conversation. What harm could this cause if the content of a discussion was shared with those who could not attend, for example?

## How to Mitigate the Risks

**1. Carefully Vet Your Vendors**

- Ask direct questions to AI notetaker companies about how data is stored, retained, and used for AI training.

- Seek contractual assurances that sensitive data won't be repurposed.

- Complete a DPIA if authorising the use of AI notetakers in your school.

**2. Establish a School Policy**

- Incorporate into the most relevant policies, when and how AI notetakers may be used (e.g. AUPs, Online Safety, Safeguarding, Data Protection etc.)

- Update staff and parents on your approach, policy and protocols surrounding AI notetakers.

**3. Update Protocols**

- Once you have decided whether you permit staff to use AI notetakers, and your approach to allowing staff to be recorded using them you will need to establish clear and consistent processes.

- If relevant, how will you decide and communicate about approved AI notetakers? Who is the approver and what is your process for approval?

- How can you obtain consent from all participants, including external parties, before using a notetaker? Consider the need to obtain this consent each and every time you deploy a notetaker.

- This is true whether your meeting is with external participants or solely an internal meeting. Ensure employees understand that meetings may be recorded or transcribed through the same consent procedures (and include notice in your internal company policies as an extra layer of protection).

- If delivering a meeting or training online, make it clear at the beginning of the session/meeting (or beforehand), what your stance is on notetakers and what will you do if you see one start to record without consent?

- If the meeting will contain confidential or sensitive information, or if consent is not provided or able to be given by everyone, then the notetaker/s should not be permitted. We recommend that in such instances, you should remove the notetaker/s from the meeting.

- If a staff member attends a meeting where an AI notetaker is present, what protocol should they follow?

# Further Support

Please check out the following for more support:

- Resources about generative AI - genai.lgfl.net
- Policy templates - safepolicies.lgfl.net
- Subscribe to our newsletter for regular updates -newsletter.lgfl.net
- Email us – safeguarding@lgfl.net
- DfE Data Protection Guidance - https://www.gov.uk/guidance/data-protection-in-schools/data-protection-policies-and-procedures