



Why We Use an Opt-Out Approach for Audio Recording in Classrooms

Starlight AI Coaching Platform & UK GDPR Compliance

Starlight Opt-Out GDPR Notice

Why We Record Lessons

Starlight is a professional development platform that helps teachers reflect on and improve their practice. Teachers may record classroom audio for coaching purposes, which is then transcribed and analysed by AI to provide personalised insights. No video is recorded, and students are not identified.

Our Legal Basis

- **Schools are the Data Controllers.** They rely on the lawful basis of **Public Task** under UK GDPR, because recording and reviewing lessons is part of their official role in delivering education and supporting teaching quality.
- **STAR21 is the Data Processor** for schools, handling lesson audio and transcripts only under the school's instructions. This means the school decides why recordings are made, and STAR21 processes them only under the school's direction.
- For anonymised or aggregated data (which cannot identify individuals or schools), **STAR21 acts as an independent Data Controller** under the lawful basis of **Legitimate Interests**, specifically to improve our services and contribute to educational research.

Why an Opt-Out?

Because recordings are processed under Public Task, schools are not required to obtain consent. Instead, we operate an **opt-out model** to minimise administrative burden while ensuring parents, students, and staff retain choice.

If a parent or student prefers not to have lessons recorded, they can request an opt-out by contacting the school. Teachers are informed of any opt-outs and will avoid recording those lessons.

Data Privacy and Security

- Recordings are used only for teacher coaching and professional growth.
- Files are encrypted, access-controlled, and retained securely for the duration of the school's Agreement with STAR21.
- Upon termination or expiry of the Agreement, all Customer Personal Data (including audio files and transcripts) will be deleted (or returned to the school at its option) within ninety (90) days, unless a longer retention period is required for safeguarding or legal obligations.
- Recordings are never used for staff performance management.
- Where a safeguarding or legal obligation requires it, recordings may be preserved securely under legal hold until the matter is resolved.

Questions or Concerns

For questions about school use of recordings, please contact your school directly.

For questions about STAR21's platform and data practices, you can reach us at: info@starlightmentor.com