Starlight
SPARK INSIGHT
powered by STAR21

NOTICE FOR PUPILS, PARENTS AND STAFF

Opt-Out Notice: audio recording in classrooms

Why schools use an opt-out approach for Starlight lesson recordings

Version 2.0 · 7 November 2026 · For: Pupils, parents, carers and staff

Why lessons are recorded

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. Transcripts record what pupils say, and a teacher's private feedback may refer to it; no record of any pupil is created and nothing about an individual pupil reaches leaders.

The legal basis

- **Schools are the Data Controllers.** Maintained schools and academies rely on the lawful basis of **public task** under the UK GDPR, because recording and reviewing lessons is part of their official role in delivering education and supporting teaching quality. Independent schools may rely on legitimate interests instead.
- **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.
- **STAR21 is a Data Controller for a limited set of its own purposes**, relying on legitimate interests: aggregate statistics that identify no person or school; de-identified lesson content, with names replaced automatically before use, used to operate, evaluate and improve Starlight; and national insight reports about teaching, which never quote anyone or identify a person or school and from which a school can opt out. Recordings are never used to train AI models.

Why an opt-out?

Because recordings are processed under public task, schools are not required to obtain consent. Schools therefore use an **opt-out approach**, which keeps administration light while making sure pupils, parents and staff retain a choice.

If a parent or pupil prefers not to have lessons recorded, they can ask for an opt-out by contacting the school. Teachers are told of any opt-outs and will not record those lessons.

Privacy and security

- Recordings are used only for teacher coaching and professional growth.
- Recordings are encrypted and private to the teacher who made them. They are kept until the teacher deletes them, until the school instructs their deletion, or until the school's agreement with STAR21 ends.
- When the agreement ends, all Customer Personal Data (including audio files and transcripts) is 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 and AI feedback are never used for staff performance management.

- Where a safeguarding or legal obligation requires it, recordings may be preserved securely under a legal hold, on the school's instruction, until the matter is resolved.

Questions or concerns

For questions about the school's use of recordings, please contact the school directly. For questions about STAR21's platform and data practices, contact us at **info@starlightmentor.com**. STAR21's Privacy Policy and Data Protection Impact Assessment are in the Starlight document library.