DDSB Ignite Learning

PROCEDURE

Governance (GOV)

PR GOV 14-01

Title: **Artificial Intelligence (AI) Governance Procedure**
Adopted: October 20, 2026
Effective: November 13, 2026
Amended/Reviewed: N/A

This procedure must be interpreted, applied, and implemented in ways that uphold Indigenous and human rights and responsibilities, promote accessibility, and prevent and address (and do not reinforce) discrimination/discriminatory barriers.

1.0 RATIONALE

This procedure supports the implementation of the DDSB Artificial Intelligence (AI) Governance Policy by establishing operational expectations, responsibilities, safeguards, and processes related to the use of AI across the system.

This procedure is intended to support the responsible, transparent, privacy-aware, and educationally appropriate use of AI while maintaining meaningful human involvement, professional judgement, accountability, and public trust.

2.0 DEFINITIONS

2.1 Approved AI Tools and Systems: Artificial Intelligence tools, platforms, or applications that have undergone appropriate district review and authorization processes utilizing the Technology Approval Process including privacy, cybersecurity, accessibility, procurement, records and information management, legal, and operational considerations, as applicable.

2.2 AI-Generated Content: Text, images, audio, video, data, summaries, recommendations, or other outputs produced in whole or in part by an Artificial Intelligence system.

2.3 Algorithmic Bias: Systematic errors, assumptions, patterns, or outputs that may unfairly advantage or disadvantage individuals or groups, including discriminatory or exclusionary impacts.

2.4 Sensitive Information: Information that may reasonably be expected to cause harm, distress, discrimination, reputational impact, safety concerns, or privacy risks if disclosed, accessed, or used inappropriately. This includes personal information (e.g., student education records, IEPs, health/medical data, assessments, discipline records, family circumstances, employee records, identifiable photos, and student/employee numbers).

2.5 Automated Decision-Making: The use of technology to make, inform, support, or automate decisions with limited or no meaningful human involvement.

2.6 Privacy Impact Assessment (PIA): is a systematic risk-assessment process used to identify, evaluate, and mitigate potential privacy and data protection risks associated with the collection, use, disclosure, storage, or destruction of Personal Information (PI) or Personal Health Information (PHI).

2.7 MFIPPA: means *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56, as amended.

2.8 Meaningful Human Oversight: Active human participation that includes the ability to review, question, assess, intervene in, or reject AI-generated outputs or recommendations.

2.9 AI Enabled and Embodied Technology: Physical objects and/or hardware that combine embedded artificial intelligence with tangible form factors, sensory awareness, and/or real-time environment interaction.

3.0 RESPONSIBILITY

3.1 Chief Executive Officer

The Chief Executive Officer (CEO) is responsible for the implementation, administration, and oversight of this procedure.

The CEO may delegate operational responsibilities to appropriate departments such as:

- Communications Services;
- Human Rights and Equity staff;
- Indigenous Education staff;
- Information Technology Services;
- People and Culture staff; and
- Program and portfolio leadership
- Research and Strategic Analytics;
- Records and Information Management.

3.2 Supervisory and Management Staff

Superintendents, Principals, and Department Managers are responsible for:

- supporting compliance with this procedure within their areas of responsibility;
- ensuring appropriate oversight of AI use;
- supporting staff awareness and responsible practice;
- identifying operational risks and concerns; and
- escalating issues where appropriate.

3.3 Staff

The staff are responsible for:

- complying with Board requirements related to AI use;
- exercising professional judgement and Meaningful Human Oversight when

using AI;
- reviewing and verifying AI-generated outputs prior to use or reliance;
- protecting privacy, confidentiality, and records; and
- using AI in ways that align with Board expectations, professional responsibilities, and applicable legislation.

3.4 Students

Students are responsible for using AI in accordance with Board and school expectations, academic integrity expectations, and applicable technology procedures.

4.0 APPLICATION AND SCOPE

This procedure applies to the use of Artificial Intelligence (AI) including, but not limited to, in teaching and learning, communications, accessibility supports, administrative and operational processes, research and analytics, planning and reporting, decision-support activities, and other Board-related functions.

This procedure shall be read in conjunction with the DDSB Artificial Intelligence (AI) Governance Policy and all applicable legislation, collective agreements, Board policies, procedures, standards, and approval processes related to privacy, cybersecurity, records and information management, acceptable use, procurement, accessibility, Indigenous education, and human rights.

4.1 Indigenous Rights, Human Rights and Accessibility

a) AI use shall support accessibility, inclusion, and meaningful participation and shall not create or reinforce barriers for students, staff, or community members.
b) Before AI is used in ways that may affect individuals or groups, users shall consider and address algorithmic biases that may create, reinforce, or perpetuate harmful stereotypes, potential barriers, and/or adverse, inequitable, disproportionate, or discriminatory impacts.
c) This includes consideration of impacts on students, staff, and communities based on ancestry, race, ability/disability, sex, gender identity, gender expression, sexual orientation, creed/religion, and other protected grounds under the Ontario Human Rights Code, including their intersectional impacts.
d) Where AI use or implementation may have distinct implications for Indigenous staff, students, families, communities, or related rights and interests, the Board shall consider appropriate relationship-based, culturally responsive, and rights-aware approaches.
e) Before initiating any generative AI request, users are required to pause and reflect on the land on which they reside and work, ensuring they prompt and generate intentionally and responsibly to minimize unnecessary environmental, social, and cultural impacts.

5.0 PROCEDURES

5.1 General Requirements for AI Use

AI may be used to support learning, accessibility, communication, research, creativity, efficiency, administrative work, and operational processes where such use aligns with Board policies, procedures, professional responsibilities, and applicable legislative requirements. Employees and authorized users shall use only the AI tools and systems approved or authorized through applicable Board processes.

5.2 Human Review and Verification

AI use shall maintain Meaningful Human Oversight appropriate to the activity's risk level and shall not replace professional judgement, ethical responsibilities, relationship-based practice, or legally required human decision-making. AI shall not independently make final decisions that materially affect a student's education, well-being, or status, or an employee's employment. Users must not rely solely on AI-generated outputs. Users shall exercise caution when relying on AI-generated outputs, recognizing that outputs may be inaccurate, incomplete, biased, fabricated, misleading, or outdated.

5.3 Privacy, Confidentiality, and Data Protection

Personal, confidential, or sensitive information shall not be entered into AI tools unless the use has been authorized through appropriate district approval processes and complies with applicable privacy, cybersecurity, records and information management, regulatory and technology requirements. Where practicable, users shall use fictional, synthetic, or de-identified data. Approval of an AI tool does not grant blanket authorization to enter personal or sensitive information into that tool.

In addition to Board requirements, users shall comply with the applicable standards of practice and obligations of their professional regulatory bodies. Where professional obligations and Board requirements appear to conflict, users shall seek guidance through appropriate Board processes to ensure compliance with applicable legal, regulatory, and professional requirements. This includes, but is not limited to, staff with professional designations in law, accounting, and regulated health services.

Users shall minimize the disclosure of information, avoid entering unnecessary identifying information, use approved tools, and report suspected privacy, cybersecurity, or data-related concerns through appropriate Board processes. See Privacy Procedure for more information.

Contracts and approvals for AI tools handling Board data must prohibit vendors and subcontractors from using inputs (prompts, documents) or outputs for model training, analytics, profiling, or secondary commercial purposes without explicit, legally authorized Board approval.

5.4 Cybersecurity and Incident Management

AI systems used for district purposes shall be implemented and managed in accordance with applicable Board cybersecurity, technology, privacy, and incident management requirements. AI systems may also be subject to monitoring, logging, auditing, access controls, or other safeguards to support privacy, security, accountability, and operational integrity.

Users shall promptly report suspected security incidents, unauthorized access, data breaches, misuse, inaccurate or harmful outputs, or other concerns relating to AI systems through appropriate Board processes including, following the Privacy Breach Reporting and/or cybersecurity processes. Consultation or concerns may also be accessed through emailing, specific to Personal Identifying Information (PII) to edsta.inquiries@ddsb.ca or related to general AI consideration to ai@ddsb.ca inbox with relevant information.

Where appropriate, the Board may restrict, suspend, modify, or discontinue AI systems or uses that present significant privacy, cybersecurity, operational, accessibility, equity, or human rights concerns.

5.5 Review and Approval of Emerging and High-Risk AI Use

Departments considering new, emerging, or high-risk AI uses shall engage appropriate Technology Approval Processes prior to implementation.

Higher-risk uses may include evaluative, predictive, profiling, monitoring, surveillance-related, or decision-support uses, particularly where personal or sensitive information or significant impacts may be involved.

Mandatory privacy screening is required for any proposed AI tool processing personal information. A full Privacy Impact Assessment (PIA) should be completed prior to implementation where required by Board policy or applicable privacy legislation (including MFIPPA). Depending on the nature, scope, and risk of the proposed use, consultation may include Information Technology Services, Privacy and Records Management staff, Research and Strategic Analytics, Human Rights and Equity staff, Indigenous Education staff, Legal Services, Communications Services, and program-area leadership.

5.6 Teaching, Learning and Board Operations

The Board supports the innovative and responsible use of Artificial Intelligence (AI) to enhance educational outcomes while safeguarding privacy, and integrity. Staff are expected to apply a critical lens when using AI, evaluating tool outputs, biases, and instructional appropriateness before integration.

The use of AI within is guided by the following principles

a) **Accepted Uses:** AI may be used to support teaching, learning, and Board operations where appropriate and aligned with Board policies and procedures.

b) **Uses Requiring Scrutiny and Review:** AI may be used to support decision-making provided decisions are made transparently, there is meaningful human review and accountability, and affected individuals have access to a meaningful path to reconsideration, provided the use of AI is not otherwise prohibited.
c) **Prohibited Uses:** The use of AI to evaluate or profile students or staff, to make autonomous or determinative decisions without human oversight, to generate outputs that cannot be meaningfully reviewed or verified, or to carry out surveillance, is prohibited.

For specific implementation procedures, approved tools, and detailed operational requirements, please refer to the Board's AI Guidelines.

5.7 Classroom Use

AI may be used to support teaching and learning in ways that are developmentally appropriate, educationally meaningful, and aligned with curriculum, assessment, and academic integrity expectations.

As AI becomes increasingly integrated into educational settings, educators play an important role in supporting students to engage with AI critically, ethically, and responsibly.

Educators are responsible for supporting responsible AI use, providing guidance regarding safe and acceptable classroom use, and ensuring that human, professional judgement remains central to assessment, evaluation, and student support.

Students may be required to disclose AI use in learning activities where directed by educators or school expectations.

5.8 Student Safety, Cyberbullying and Harmful Content

AI tools and systems shall not be used to create, alter, distribute, or threaten to distribute content that harasses, mistreats, intimidates, humiliates, exploits, impersonates, or otherwise harms any individual.

5.9 Transparency and Disclosure

The Durham District School Board prioritizes ethical and transparent technology use. Per the DDSB AI Use Guidelines, disclosing AI usage is mandatory when going beyond routine tasks, and where required by Board expectations, professional responsibilities, or applicable guidance.

5.10 Records and Information Management

Where AI is used in substantive Board work, including decision-making, communications, recommendations, reports, planning, or operational processes, relevant prompts, inputs, outputs, revisions, and related documentation may be subject to applicable Board records and information management requirements.

Artificial Intelligence platforms shall not be relied upon as records storage systems unless specifically authorized by the board.

5.11 Monitoring, Reporting, and Incident Response

Concerns regarding inappropriate, unsafe, discriminatory, misleading, harmful, inaccurate, unauthorized, or non-compliant Artificial Intelligence (AI) use shall be reported through appropriate supervisory, privacy, cybersecurity, human rights, or other applicable Board processes, edsta.inquiries@ddsb.ca or ai@ddsb.ca.

The Board may review AI practices, emerging risks, and operational concerns, and may update guidance, restrictions, or approved practices where necessary.

5.12 AI Enabled and Embodied Technology

Technology and Generative Artificial Intelligence continues to shift quickly, including AI enabled devices and embodied AI tools. Direction regarding AI Enabled and Embodied Technologies is provided in Appendix A.

The guidance is provided specific to:

- Considerations: Staff Request for Use of AI Enabled Eyewear
- Considerations: Student Request for Use of AI Enabled Eyewear
- AI Embodied Companions

6.0 APPENDICES

Appendix A - AI Enabled and Embodied Technology

7.0 LEGISLATIVE REFERENCES

- Education Act, R.S.O. 1990
- Municipal Freedom of Information and Protection Act (MFIPPA)
- Enhancing Digital Security and Trust Act, 2024
- Truth and Reconciliation Commission Calls to Action
- United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act (AODA)

8.0 REFERENCE DOCUMENTS

- DDSB Generative AI Guidelines (2025)
- DDSB Records and Information Management Policy (P GOV 10)
- DDSB Technology Approval Process (TAP) (PR GOV 06-03)
- DDSB Indigenous Education Policy (P IND 01)
- DDSB Human Rights, Anti-Discrimination and Anti-Racism Policy (P HRA 01)
- DDSB Artificial Intelligence (AI) Governance Policy (P GOV 14)
- DDSB Privacy Policy (P GOV 06) and Procedure (PR GOV 06-01)
- DDSB Acceptable and Safe Use Procedure (PR SCO 99-01)