Department for Education

Introducing a certification scheme for assuring EdTech and AI product safety

Government consultation

Launch date 10 November 2026
Respond by 4 February 2027

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Foreword by Paul Waugh, Minister for Early Education

Technology is now an integral part of education, supporting teaching, learning and the smooth running of schools, colleges and early years settings across the country. As digital tools, including artificial intelligence (AI), continue to rapidly evolve, they have the potential to help teachers focus more of their time on teaching, support high-quality learning experiences, and improve access to education for all children.

Our ambition is to harness technology's benefits and ensure children develop the knowledge and skills they need to thrive in a digital world. But it must be safe. Children's safety, their educational outcomes, human relationships and professional judgement must remain at the heart of our education system.

The way technology develops for use in education is not pre-determined. Government, education settings and suppliers all have a role in ensuring the rapid innovations in technology reflect educational priorities, and serve the best interests of children. Safety is a non-negotiable part of that. In an education system where decisions about technology use are made across thousands of schools and settings, Government has an essential role in helping shape a market that delivers on the priority of safety. Our aim is to create the conditions for high-quality, safe, trustworthy innovation to flourish.

While many EdTech products are already used routinely and safely in education settings, the pace of innovation and the growing complexity of products can present heightened risks – in relation to data protection, online safety and children's wellbeing. Some features of technology, including generative AI, can increasingly expose children to risks and make it harder for education settings to identify and manage those risks.

The Department for Education (DfE) has published digital and technology standards for schools and colleges, and generative AI product safety standards for suppliers. We know that schools and other education settings are making increasingly complex decisions about the technology they use. Settings are expected to assess technical safety risks with limited information from the market and without the clear assurance they need to make decisions with confidence.

That is why we are setting out proposals for product certification. Independent assessment against defined safety criteria could provide a credible and consistent way to help education settings identify products that have met a minimum standard for safety. Product certification would not, on its own, address all questions about implementation or effective use, but it could give schools and other settings greater assurance before products are purchased or used.

We want any product certification scheme to be robust and credible, while also being proportionate and straightforward for suppliers to navigate. England has a thriving EdTech market, with a growing number of products that have the potential to support high-quality teaching, learning and administration across education settings. The sector is innovative

and fast-moving, and many products are bringing substantial benefits for children and staff. The aim is not to slow innovation but ensure that innovation is directed towards the best interests of children.

I encourage everyone with an interest in the safe and effective use of technology in education to share their views.



Paul Waugh MP

Minister for Early Education

Introduction

Who this consultation is for

The following is a non-exhaustive list of groups who may be interested in this consultation. The consultation is open to everyone, and all individuals and organisations with an interest in the proposals are welcome to respond. The question overview section indicates which questions may be especially relevant to specific groups.

- School and college leaders, teachers and support staff, including procurement leads and IT leads
- Academy trusts, local authorities, college governing bodies, dioceses acting on behalf of governing bodies, and site trustees
- Early years providers
- Governors and trustees
- Parents and carers
- Pupils, students and youth representative organisations
- Devolved governments
- Organisations which support education settings, including SEND and inclusion organisations and safeguarding experts
- Organisations, experts and academics specialising in child rights and digital safety
- Edtech developers and suppliers (UK and international)
- Conformity Assessment Bodies (CABs)
- United Kingdom Accreditation Service (UKAS)

Issue date

The consultation was launched on 10 November 2026.

Enquiries

If your enquiry is related to the policy content of the consultation you can email: edtechsafety.CONSULTATION@education.gov.uk.

If your enquiry is related to the consultation process in general, email coordinator.consultations@education.gov.uk or visit DfE's Contact us page.

Additional copies

Additional copies can be downloaded from GOV.UK DfE consultations.

The response

The results of the consultation and DfE's response will be published on GOV.UK in Spring 2027.

About this consultation

This consultation sets out DfE's proposal to establish a product certification scheme to assure the safety of EdTech used in schools and other education settings in England. It seeks views on how such a scheme could support safer decision-making, reduce burdens on education settings and give suppliers a clear and proportionate route to demonstrate that their products meet defined safety standards.

Subject to the outcome of this consultation, a minimum of 18 months would be needed to establish the product certification scheme, before products could be certified, followed by a transition period to allow adoption by suppliers and education settings.

To help inform policy development, this document seeks to collect views on:

- the needs of education settings to ensure the safety of children (everyone under the age of 18) online and when using EdTech
- the rationale for and aims of product certification
- how product certification could work in practice, including the role of independent assessment and accreditation
- which products should fall within the scope of a product certification scheme
- the minimum safety criteria products should be assessed against
- which education settings should use certified products
- how to make sure a scheme is proportionate, practical and navigable for suppliers
- the impact of compliance on the EdTech market and how we can continue to support innovation

Most of the questions in the consultation are optional so you only need to answer questions that are applicable to you, and where you would like to comment.

Question overview

The table below shows who questions are aimed at. All respondents are welcome to answer all questions, however they may find that some are less relevant to them.

About you

Question number(s)	These questions are primarily aimed at
1, 2, 3, 4, 5, 6, 7, 8,	All
9, 10	Education settings
11, 12	EdTech developers and suppliers

Why we are proposing a certification scheme

Question number(s)	These questions are primarily aimed at
13, 14	All
15, 16	Education settings EdTech developers and suppliers Organisations, experts and academics specialising in child rights and digital safety

Scope of the proposed product certification scheme

Question number(s)	These questions are primarily aimed at
17, 18, 19, 20	All
21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32	Education settings EdTech developers and suppliers Organisations, experts and academics specialising in child rights and digital safety

A product certification scheme in practice

Question number(s)	These questions are primarily aimed at
33, 34	All
35, 36, 37, 38, 39	EdTech developers and suppliers UKAS CABs Organisations, experts and academics specialising in child rights and digital safety
40, 41, 42, 43,	EdTech developers and suppliers

Encouraging adoption of a product certification scheme

Question number(s)	These questions are primarily aimed at
44, 46	Education settings EdTech developers and suppliers Organisations, experts and academics specialising in child rights and digital safety
45	Education settings (particularly Early Years) Organisations, experts and academics specialising in child rights and digital safety
47, 48, 49	All

Respond online

To help us analyse the responses, use the online system wherever possible. Visit DfE's consultations on GOV.UK to submit your response.

Other ways to respond

If for exceptional reasons, you are unable to use the online system – for example, because you use specialist accessibility software that is not compatible with the system – you may request an alternative format of the form.

By email

edtechsafety.CONSULTATION@education.gov.uk

By post

EdTech Safety Certification Consultation Team

Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Deadline

The consultation closes on 4 February 2027.

Privacy and confidentiality

Overview

This information applies to everyone responding to the consultation, including children and young people. Before you respond, it is important that you understand what we will do with the information you give us. We have explained the important things you need to know here:

Information we collect

We ask for information such as your name, email address, any organisation you are answering on behalf of, as well as your answers to the consultation questions.

Why we collect this information

We use this information to help us understand the perspective from which people's views are being shared and to improve our policies. We only use your information for the purposes connected with this consultation.

Information handling

DfE is responsible for looking after the information you give and making sure it is handled safely and securely. We keep consultation responses for up to 10 years after the consultation closes, and then securely delete them.

Sometimes, the law requires us to share the information. For example, members of the public are allowed to ask to see information held by government through freedom of information laws. If you tell us that you would like your response to be kept confidential, we will take this into account, but we cannot guarantee this if we are required by law to share information. Children have the option not to give their name and email address if they would prefer.

Use of AI

We may use AI to help organise and summarise responses (for example to identify common themes). People will always review any AI outputs for bias, accuracy, completeness and whether they fairly reflect respondents' views. AI will not make decisions or determine the outcome of the consultation. All decisions and conclusions will be made by people.

More information

You can find more information about how DfE uses and protects personal information at: Personal information charter - DfE - GOV.UK (www.gov.uk).

Privacy Notice

The personal data (name and any other identifying material) that you provide in response to this consultation is processed by DfE as a data controller in accordance with the UK GDPR and Data Protection Act 2018, and your personal information will only be used for the purposes of this consultation. DfE relies upon the lawful basis of article 6 (1) (e) of the UK GDPR, which allows us to process personal data when this is necessary for conducting consultations as part of our function. We may share information we hold about you with certain organisations, where the law allows it or we have a legal obligation to do so. In all cases, we will comply with the Data Protection Act 2018.

The personal information will be retained for a period of 10 years following the closure of the consultation period, after which it will be securely destroyed. See privacy information: members of the public for more details. You can read more about what DfE does when we ask for and hold your personal information in our personal information charter.

We may use computer-based tools, including AI, to help review and summarise the responses we receive. These tools can assist us in identifying themes, grouping similar comments, and processing large volumes of information more efficiently. We may use AI to help organise and summarise responses, for example to identify common themes. People will always review any AI outputs for bias, accuracy, completeness and whether they fairly reflect respondents' views. AI will not make decisions or determine the outcome of the consultation. All decisions, conclusions and interpretations will be made by people, and the use of these tools does not replace human judgement. All personal data will continue to be handled securely and in line with data protection legislation.

Confidentiality

Information provided in response to this consultation, including personal data, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 2018, or the Environmental Information Regulations 2004. If you want all or any part of your response to be treated as confidential, please indicate this preference in response to Question 6 below. If a request for disclosure of the information you have provided is received, your preference will be considered, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not in and of itself be regarded as legally binding for DfE.

About you

The following introductory questions will help us understand more about you and, where relevant, the nature of your business or organisation and the main ways in which you currently interact with education settings in England. This will help us direct you to the questions that are most relevant to you and/or your organisation and analyse your responses. We know that not everyone will wish or feel able to answer all the questions in this consultation. However, you will still have the option to answer all the questions if you wish to do so.

Question 1: Please provide your full name:

[Open text]

Question 2: Please provide your email address:

[Open text]

Question 3: Are you responding to this consultation as an individual or on behalf of an organisation (for example an education setting, company, research organisation, charity, union)?

If you are responding as an individual, we will consider the views within your response to this consultation to be your personal views.

If you are responding on behalf of an organisation, we will consider the views within your response to this consultation to be those of your organisation and not necessarily your personal views:

- Individual
- Organisation

Question 4: If you are responding to this consultation on behalf of an organisation please provide its name:

(Only to be completed if ‘organisation’ has been selected in Question 3)

[Open text]

Question 5: Are you happy to be contacted directly about your response?

Please note, we may wish to contact you directly about your responses to help our understanding of the issues. If we do, we will use the email address you have given above:

- Yes
- No
- Prefer not to say

Question 6: As the government analyses the consultation findings, we may identify direct quotes to include in the published government response. May we use your feedback in this way?

- Yes, and you can name me
- Yes, but please do not name me/anonymise me
- No

Question 7: Would you like us to keep your responses confidential?

- Yes
- No

Question 8: Which of the following best describes you or the organisation or perspective you represent?

We recognise that more than one option may apply to you. Please select only the role that best reflects the perspective from which you are answering—for example, select “education setting” if you are responding in your role as a teacher, even if you are also a parent or carer:

- Parent, carer or guardian
- Education setting
- EdTech supplier
- Other technology supplier
- Expert, research organisation or charity
- Student/child or young person
- Other (member of the public)
- Prefer not to say

Question 9: Which of the following best describes your role within the education setting?

(Only to be completed if ‘education setting’ has been selected in Question 8)

- Designated safeguarding lead (or deputy)
- Governor or trustee
- Academy trust leader or other trust leadership position
- Headteacher or principal
- IT lead
- IT support
- Network manager
- Senior Leader
- School, college or trust business manager
- School or college support staff
- Teachers of computer science and subject leads
- Special educational needs coordinator
- Teacher
- Student teacher
- Technical advisor
- Other – If other, please describe your role [open text 3000 character limit]

Question 10: Which of the following best describes your setting?

(Only to be completed if ‘education setting’ has been selected in Question 8)

- Early Years setting
- Primary school
- Secondary school
- Special school
- Academy trust (i.e. your role covers multiple Trust schools)
- Local authority (i.e. your role covers local authority maintained schools))
- Further Education setting or college
- Other – If other, please describe your setting type [open text]

Question 11: Which of the following best describes the company you work at?

(Only to be completed if ‘EdTech supplier’ or ‘other technology supplier’ has been selected in Question 8)

- Micro supplier (10 employees or fewer)
- Small supplier (11–50 employees)
- Medium-sized supplier (51–250 employees)
- Large supplier (more than 250 employees)

- Global technology supplier (1000+ employees and operating internationally)
- Consultancy or service provider
- Non-profit or social enterprise

Question 12: Which types of product(s) does your organisation supply?

(Only to be completed if ‘EdTech supplier’ or ‘other technology supplier’ has been selected in Question 8)

Please select all that apply:

- Foundational learning products – for example, digital learning content, online Course platforms or content repositories
- Personalised learning products – for example, adaptive learning platforms or AI-enabled tutoring tools
- Immersive and experiential learning products – for example, virtual, augmented or simulated learning environments
- Assistive and inclusive learning products – for example, accessibility, SEND or wellbeing tools
- Management and administrative products – for example, management information, HR and finance systems
- Safeguarding products – behaviour or safeguarding systems
- Digital infrastructure - for example internet services and cloud solutions
- Online safety and security products – products designed to help protect children from harmful or inappropriate online content, activity or interactions, including filtering and monitoring products
- Cyber security products - products designed to protect education settings from cyber breaches
- Assessment technologies – for example, assessment platforms, diagnostic testing, automated marking or exam-management systems
- EdTech hardware – for example, coding robots, interactive whiteboards, VR headsets or 3D printers
- Other – please specify [open text – 6000 character limit]

Why we are proposing a certification scheme

An overview of certification

Certification provides independent assurance that a product, service or process meets a defined set of requirements. The United Kingdom Accreditation Service (UKAS) describes certification as:

> "the third-party confirmation via audit of an organisation's systems or products…" [1]

For EdTech safety, a product certification scheme would set out the specified safety criteria an EdTech product must meet to achieve certification, and the rules and procedures for assessing whether an EdTech product meets that criteria, including how compliance would be evaluated, evidenced and maintained over time.

Certifying for safety

The proposal outlined in this consultation is to certify products based on them meeting safety requirements. Certification would not make a wider assessment of a product's overall quality or educational effectiveness. The exception to this is where effectiveness is directly relevant to safety, that is, the product's lack of efficacy could put children at risk of harm.

A product shall be considered 'certified' where it has been independently assessed as meeting the scheme's safety criteria, including criteria designed to minimise the risk of emotional or developmental harm to children, support compliance with applicable legal obligations, and ensure the security and integrity of systems, data and users. The product must also operate consistently with its declared safety-related functions and not misrepresent those functions.

We are currently focusing on safety because we consider educational efficacy a more nuanced judgement – the effectiveness of products can depend on how a product is used, the context of implementation, and the needs of the education setting. We could explore how certification can support education settings with evaluating the efficacy of products in the future but it is not in scope of this scheme proposal.

[1] Accreditation vs Certification: What's the difference? | UKAS

DfE will continue to support education settings with evidence-informed decisions about quality and effectiveness through guidance and evidence on what works, including the Edtech Testbeds programme in partnership with the Education Endowment Foundation.

Question 13: How do we ensure that certification clearly signals that a product meets safety requirements, and does not reflect the wider efficacy or quality of a product?

[Open text. 6000 character limit]

The case for a product certification scheme for EdTech Safety

Used well, technology can improve access to learning, reduce workload and help schools and other education settings operate more effectively. However, increasingly complex products can make it difficult for non-specialists to judge whether products are safe and suitable.

The evidence suggests three significant areas of potential risk for children using EdTech: data infringements; exposure to harmful content; and impacts on their cognitive, social and emotional development, and mental health.

The EdTech examined report from the Information Commissioner's Office identified recurring compliance gaps with data protection legislation, including storing more data than is needed; data-hosting in countries with weaker

There is extensive evidence[2] of the range of harmful content that children can access on the internet and the significant impact this can have on their lives. It is widely accepted that effective technical solutions should be used in education setting to minimise exposure to this material.

There is also growing recognition of the safety implications of product design choices on children's cognitive development, socio-emotional wellbeing and mental health from product features which may encourage use beyond the point of educational benefit, harmfully shape behaviours, undermine self-regulation, or fail to account for differences in age, developmental stage or additional needs.[3]

DfE has set important standards for education settings and suppliers, including on filtering and monitoring and generative AI product safety, referred to in Keeping Children Safe in Education guidance. EdTech suppliers also may be subject to the Online Safety Act (depending on the service and function), relevant data protection legislation, and the ICO's

[2] Ofcom (2026) Children's Online experiences research report

[3] 5Rights (2023) Updated Disrupted Childhood: The cost of persuasive design - 5rights

Age appropriate design code of practice which applies to online services a child is likely to interact with. These standards provide expectations for safe and responsible use of technology, but there is currently no assurance mechanism to check whether EdTech products meet those standards.

Education settings have consistently told us that they need independent assurance of the safety of the technology they use. At present, they make decisions about EdTech products without clear evidence about how safe they are. This places a significant burden on schools and is also a barrier to adoption of tech – in the Technology in Schools Survey 2025 half (50%) of leaders said safeguarding and data concerns were to a great or some extent a barrier to increasing the uptake of technology by schools. [4]

This uncertainty also affects suppliers, who may face a slow and fragmented route into education settings with no clear way to demonstrate they meet safety expectations. The government is therefore considering whether a government-backed product certification scheme could provide a practical way to strengthen assurance without introducing disproportionate burdens.

Question 14: Do you agree or disagree that the following risks are the main risks DfE should seek to address through the proposed certification scheme:

14a: Unlawful use of children's personal data

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know
- Prefer not to say

14b: Exposure to harmful content

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know
- Prefer not to say

[4] Technology in schools survey report: 2024 to 2025 - GOV.UK

14c: Harm to children's cognitive, social and emotional development and mental health

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Are there any significant risks from the use of technology in education settings that we have not covered? Please describe any additional risks and how you think they should be prioritised.
[Open text 6000 character limit]

Question 15: To what extent do you agree or disagree that product certification is an appropriate approach to meet the following aims?

15a: Support safer decision-making on use of EdTech products:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

15b: Reduce burden on education settings when purchasing EdTech products:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

15c: Give suppliers a clear and proportionate route to demonstrate that their products meet robust, defined safety criteria:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Question 16: What robust assurance mechanisms, if any, are already available to education settings and suppliers in England to meet the above aims?

[Open text 6000 character limit]

Scope of the proposed product certification scheme

Education settings that should use certified products

Product certification should apply to products in scope of the scheme (as set out in the next section) that are used or made available by education settings for children aged 0-18.

Safeguarding responsibilities apply across education settings, including early years, schools and further education. While the nature of those responsibilities, and the way technology is used, may vary by age, developmental stage, and setting type, the underlying need for appropriate safety assurance is not limited to schools. The risks outlined in this consultation can arise for children across different settings, particularly where products process children's data, use generative AI, or provide monitoring or filtering functions.

We recognise that in further education, settings may include mixed age cohorts, children may exercise greater autonomy, and technology may be used for technical, vocational, or work-related learning. This requires careful consideration to ensure that safety expectations and outcomes remain consistent across contexts, while recognising that the measures used to achieve them may legitimately vary according to the child's age and developmental stage, the setting, the use case, the product's configuration, and the wider safeguards within which it is deployed.

EdTech products that could fall within the scope of a product certification scheme

EdTech is a broad category. It includes many products that are already used safely by children and education settings. Many products are unlikely to be suitable for product certification because they present a low risk of harm. We propose taking a risk-based approach to products in scope of the scheme.

The categories we propose have been chosen because they present a higher likelihood of the three risk areas identified – serious data infringements, harmful content exposure, or risks to cognitive development and socio-emotional wellbeing.

Risks are higher where products are child-facing and where products are a key part of the classroom experience or the administration of an education setting. The risks are also higher where a product failure could significantly impact a child, such as failing to block harmful content or allowing inappropriate use of their personal data.

The products in scope for this scheme are grouped into the following four categories:

1. Filtering products
2. EdTech conducting high-risk data processing of children's data

3. Student-facing generative AI tools
4. Student-facing personalised learning tools

Products in scope may fall into more than one category.

Products have been excluded from this proposal where the risks are considered lower. This is often the case when an adult has autonomy over whether they use the tool or the tool is not making decisions based on a child's data. For example:

- General office and communication tools, such as email and word-processing software, which do not conduct high-risk processing of children's personal data
- Products that provide static content without personalisation, such as PDF textbooks and content repositories
- Hardware and infrastructure, including computers, tablets, interactive whiteboards, and projectors
- Staff-facing products, including generative AI tools and administrative systems that do not conduct high-risk processing of children's personal data

Product certification would assess whether a product itself meets the scheme's requirements. However, products do not always operate in isolation, and may form part of a broader technology ecosystem, with some safeguards delivered through a combination of product, platform and setting-level controls. The scheme would be clear about the requirements inherent to the product itself. Where suppliers rely on wider controls to achieve particular safety outcomes, they would be responsible for evidencing how those controls operate and how the relevant requirements are consistently met in practice.

A risk-based approach means not unnecessarily putting products through product certification if they are low risk. However, clarity about which products need to be certified, and which do not, and why, becomes important. Settings and suppliers need to know when product certification is expected. Low risk products should not be disadvantaged because there is confusion about whether product certification applies to them.

Filtering products

Schools and colleges are required to have appropriate filtering systems in place, as outlined in the statutory guidance, Keeping Children Safe in Education.[5] Technical filtering solutions support education settings to meet this requirement, preventing pupils from accessing illegal, inappropriate and harmful material. As such, they are critical to ensuring online safety. However, schools This complexity is particularly notable given the increasing

[5] 'Filtering and Monitoring' Paragraphs 173-177 (Part two)

risks from AI generated material.DfE's standards. This complexity is particularly notable given the increasing risks from AI generated material.

We are not including a category for products whose primary purpose is technical monitoring in the initial launch of the scheme. This is because monitoring tools do not directly prevent access to harmful content in the way that filtering solutions do. Instead, they support safeguarding by providing information and alerts that enable staff to identify, assess and respond to concerns. The safety of monitoring systems is highly dependent on how alerts are reviewed, interpreted, escalated and acted upon within the education setting's wider safeguarding arrangements. Certification of technical functionality alone may therefore provide limited assurance about the overall safeguarding outcome. This does not mean that monitoring and reporting capabilities are unimportant, or that they should not form part of the safety requirements for other products where relevant. Monitoring products may still be in scope of other categories we are proposing, such as EdTech conducting high-risk data processing.

EdTech conducting high-risk processing of children's data

Proportionate and lawful processing of children's personal data is essential to the functioning of many EdTech tools that support learning, safeguarding and pastoral support. All processing of children's personal data must comply with data protection law.

Any EdTech product conducting high-risk data processing of children's data would be within scope of this scheme. Where processing is considered high-risk, failures in how data is collected, used, secured or shared could have serious consequences for the children involved.

The UK GDPR[6] and the ICO[7] do not define high-risk processing but provide guidance on types of processing that may be high risk and therefore require a Data Protection Impact Assessment (DPIA)[8]. This guidance will inform the scope for this scheme. A product could be considered high-risk and therefore in scope of this scheme due to the type of data processed or the way the data is processed.

Activities that could be considered high-risk and therefore place a product in scope of this scheme may include but are not limited to:

- Large scale data processing or profiling
- Processing of special category data, including biometric data
- Processing of sensitive personal data

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[6] Art. 35 GDPR – Data protection impact assessment - General Data Protection Regulation (GDPR)

[7] Examples of processing 'likely to result in high risk' | ICO

[8] What is a DPIA? | ICO

- Processing of data concerning vulnerable data subjects
- Matching or combining datasets
- Systematic monitoring
- Automated decision-making with significant effect
- Innovative use or applying new technological or organisational solutions

Based on their typical functions, products likely to be within scope may include:

- AI tutoring tools
- Personalised learning systems
- Behaviour and safeguarding systems
- SEND platforms
- Wellbeing and mental health platforms
- Management Information Systems (MIS)
- Learning Management Systems (LMS) - if they process special category data[9]

Student-facing generative AI tools

AI tutoring tools, generative AI chatbots and content-generation tools designed for use by children, can provide personalised responses and create new content, such as text, images, audio or video. They have the potential to transform education by providing tailored support and learning opportunities to every child. However, generative AI also presents novel risks to children, and as outputs are dynamic, unpredictable and are generated in real time, existing filtering and monitoring arrangements may not provide sufficient assurance against harmful content.

When poorly designed and implemented, the use of generative AI tools can also present risks relating to children's cognitive, emotional and social development and mental health, alongside intellectual property and data protection risks. These risks are difficult for education settings to identify or assess because the processes used to generate outputs are technically complex and may not be transparent.

Product certification would apply to the student-facing generative AI product, such as an app, chatbot or tutoring tool, rather than to the underlying generative AI model or the API on its own. This is because children interact with the product as it is provided to them by an education setting. The supplier of that product would therefore be responsible for ensuring it is certified, including where the product uses a third-party model or API. This reflects the fact that the product supplier controls how the model is integrated into the product, how it is configured, and what safety features are in place to protect children.

[9] Special category data | ICO

We also propose that teacher, college, or school-created “agents”, custom AI tools, or wrappers, which are used only within that education setting would be exempt from product certification. Education settings would remain responsible for ensuring that locally created tools are designed and used safely and lawfully.

Student-facing personalised learning tools

Some student-facing tools use AI and other technology to process information about an individual child to tailor the content, pace, difficulty or sequencing of their learning experience. Many teachers find these tools a useful aid to teaching and learning. However, some design features may expose children to inappropriate learning pathways, make inaccurate or unfair assumptions through profiling, or use features that encourage excessive engagement. Where tools seek to influence the behaviour of children and their mechanisms are not easily visible to users, it is important that teachers are confident in their ethical and safe design.

The proposed scheme is focused on personalisation so would not include static learning content as there is a reduced risk of harmful content and design, and education settings are better able to view the full journey and make a judgment about product safety. A school’s filtering solution provides an additional layer of safety.

Question 17: To what extent do you agree or disagree that products in each of the following categories should be included in the scope of the proposed product certification scheme?

17a: Filtering tools:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Please explain your answer: [Open text]

17b: High risk data processing:

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Please explain your answer: [Open text]

17c: Student-facing generative AI tools:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Please explain your answer: [Open text]

17d: Student-facing personalised learning tools:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don’t know
- Prefer not to say

Please explain your answer: [Open text]

Question 18: Are there any other categories of EdTech product that you think should be within the scope of the proposed certification scheme?

- Yes
- No
- Don’t know

If yes, please provide more detail: [Open text 6000 character limit]

Question 19: Which settings do you think the use of certified products should apply to?

Select all that apply:

- Early years
- Schools
- Colleges and other Further Education settings attended by under 18s

Please explain your answer, including any considerations of how a scheme could work most effectively for different settings (and reflect the different age groups attending them).

[Open text, 6000 character limit]

Question 20: Do you agree with the proposal to not pursue a product certification scheme for technical monitoring products at this stage?

- Yes
- No
- Don't know

If no, please explain your answer [Open text 3000 character limit].

Question 21: What kind of support and guidance would help education settings understand which products are in scope for product certification and which are not?

[Open text 6000 character limit]

The minimum safety criteria that products should be assessed against

The assessment criteria are the requirements that products must satisfy to achieve certification. Detailed evidence requirements and assessment methods would be established for these criteria. We have set out initial proposals across each of the four EdTech categories.

Filtering products

Filtering products would be assessed against criteria drawn from the existing filtering and monitoring standards for schools and colleges. The standards set our expectations of schools and the technical requirements for provision. The purpose of the below criteria is to ensure that filtering products and packages function as expected to create an acceptable safe online environment. These are the functional requirements we view as necessary in all contexts.

Using these requirements as a basis, suppliers would have to evidence that filtering products:

- Block access to harmful sites and inappropriate content without unreasonably impacting teaching and learning or administration
- Have non-alterable logs of administrative and other maintenance activity enabled, to allow tracking of any system or user account changes
- Are a member of the Internet Watch Foundation (IWF), implement the IWF URL blocklist for all users and conduct all updates within a reasonable timeframe
- Are signed up to the Counter-Terrorism Internet Referral Unit (CTIRU) and integrate this blocklist for all users
- Are designed so that illegal blocklists cannot be disabled, overridden or altered by any user in a school, college, multi-academy trust (MAT), local authority or any other responsible body, including system administrators, at any level
- Support at a minimum, separate student, staff and guest filtering profiles to provide differing levels of access to online content
- Allow settings to block additional inappropriate content, which is not blocked automatically, by adding content locally
- Have the capability to be applied to all devices managed by the education setting – including those taken off-site
- Are tested on a variety of device types, to ensure filtering is effective on all devices schools might use
- Are tested in a variety of locations, including offsite
- Include relevant product patches, security, firmware and software updates for the duration of use
- Can apply network level filtering for unmanaged devices under a bring your own device (BYOD) scheme, and guests who have access to the school network
- Identify multilingual web content, images, common misspellings and abbreviations using a variety of means including URLs, domains, search terms, rule sets and image assessment
- Provide customisable alerts when web content of concern has been blocked
- Block technologies and techniques that allow users to get around the filtering, such as VPNs, proxy services and end-to-end encryption methods
- Identify device name or ID, IP address, and where possible, the individual
- Identify the time and date for each alert

- Identify the search term and content being blocked
- Prevent users from downloading additional browsers or unauthorised plugins or extensions
- Operate within requirements of UK data protection legislation. This includes that data processed for filtering should not be used for other purposes, including building a profile of the child or anyone in the family who might have access to the device and be subject of filtering[10]
- Are configured by default to fully align with the filtering and monitoring standards at point of provision

Additionally, we propose that products should:

- Have the capability to enable settings to meet DfE's cyber security standards
- At an organisational level, have suitable cyber security measures, such as Cyber Essentials Plus certification

In addition to certifying against criteria in the existing filtering and monitoring standards, the proposed product certification scheme could be expanded to further mitigate against known risks in this space. This could include the ability to filter AI-generated content**.** AI-generated content is increasingly used in mobile and desktop apps and web browsers. As such, this type of content poses particular safeguarding risks which education settings need to manage. Certification of filtering products could require that they are able to effectively filter real-time, dynamic, personalised and AI-generated content. If included, this criterion would be in place when the proposed scheme launches.

Question 22: Do you agree with the proposed certification criteria for filtering products?

- Yes
- No
- Don't know

If no, please explain your answer, including what you would change [Open text 6000 character limit]

Question 23: Should the ability to effectively filter real-time, dynamic, personalised and AI-generated content be included in the proposed certification criteria for filtering products?

[10] Right to be informed | ICO

- Yes
- No
- Don’t know

Please explain your answer [Open text 3000 character limit]

EdTech conducting high-risk processing of children’s data

The criteria for EdTech conducting high-risk processing of children’s personal data would largely focus on providing assurance that products meet relevant legal requirements, including UK GDPR, the Data Protection Act 2018 and applicable Information Commissioner's Office (ICO) codes and guidance.

This would include the ICO’s planned EdTech Code of Practice, which will be brought in following government regulations requiring production of the Code. The EdTech Code of Practice is intended to clarify how data protection law applies to EdTech suppliers. Once finalised and implemented, our intention is that requirements from the Code would inform the certification standard, helping suppliers understand what they need to demonstrate and giving education settings greater confidence that high-risk products have appropriate protections in place.

Product certification would not replace the role of the ICO as independent regulator, provide immunity from regulatory action or transfer enforcement responsibility to DfE. DfE is working with the Department for Digital, Culture, Media and Sport and the ICO to ensure that the EdTech Code of Practice, once implemented, and product certification operate coherently, with the Code clarifying suppliers’ data protection obligations across the EdTech market and product certification providing education settings with an additional layer of independent assurance for products conducting the highest-risk processing of children’s data. The final certification criteria would reflect the legal and regulatory framework in force when the scheme is established.

For EdTech likely to be conducting high-risk processing of children’s personal data, suppliers of EdTech products would have to evidence that they:

- Have conducted a Data Protection Impact Assessment[11]
- Are compliant with relevant data protection legislation and conform with relevant ICO Codes of Practice, including the Age-Appropriate Design Code, the EdTech Code of Practice, and the Artificial Intelligence and Automated Decision-Making Code (once implemented)
- Are compliant with relevant intellectual property legislation and regulations

[11] When do we need to do a DPIA? | ICO

- Have the capability to enable settings to meet DfE's cyber security standards
- At an organisational level, have suitable cyber security measures, such as Cyber Essentials Plus certification

The criteria would build upon the safety and data protection requirements within DfE's MIS Framework. Avoiding duplication of effort for suppliers is a priority when developing this product certification scheme.

Question 24: Do you agree with the proposed certification criteria for products conducting high risk processing of children's personal data?

- Yes
- No
- Don't know

If no, please explain your answer, including what you would change [Open text 6000 character limit]

Student-facing generative AI tools

Student-facing generative AI products would be assessed against the following eight standards from the generative AI: product safety standards:

- **Filtering** – effectively and reliably prevent users from accessing harmful or inappropriate content
- **Monitoring and reporting** – maintain robust activity logging procedures including recording input prompts and responses, analysing performance metrics, and alerting local supervisors when harmful or inappropriate content is accessed or attempted to be accessed
- **Design and testing** – prioritise transparency and children's safety in its design, including implementing technical and operational mitigations for identified risks, ensuring child-centred design and operation, and conducting testing with stakeholders, including children, to ensure safety
- **Governance** – are operated with accountability, including carrying out risk assessments, instigating formal mechanisms for lodging complaints, and demonstrating that its operations, decision-making processes and data handling practices are understandable and accessible to government agencies and users
- **Cognitive development** – mitigate the potential for cognitive deskilling, or long-term developmental harm to learners
- **Emotional and social development** – mitigate the potential for harm to the emotional or social development of learners, including the potential for emotional dependence

- **Mental health** – mitigate the potential for harm during mental health emergencies that are caused or worsened by interaction with generative AI tools
- **Manipulation** – do not use manipulative or exploitative design features

These existing standards outline the capabilities that generative AI products should meet to satisfy safety expectations for users in education settings. The standards distinguish between different layers of safety assurance. Some requirements relate to how a product behaves in response to user inputs, including its ability to refuse harmful requests, detect safeguarding concerns and respond appropriately. Other requirements relate to the design of the product including user interface and experience. A further set of requirements relate to governance, documentation and organisational processes. Product certification would assess compliance across these layers to provide meaningful assurance that a generative AI product was safe for use by students.

The scheme would translate each outcome into published, evidence-based and objectively assessable requirements. Certification would identify the product version, intended age range, relevant configuration, assessment methods, known limitations and conditions of use.

All student-facing generative AI products fall within the scope of the high-risk data processing scheme and would be certified against those criteria. To avoid duplication of effort for suppliers we will not certify against the three data criteria from the generative AI: product safety standards as part of this strand.

Generative AI product safety standards are likely to need to be updated as technology develops and new needs emerge. In particular, we are considering further development of standards relating to reporting on product use and safety, and the ethical use of pupils' work in developing AI tools.

This may include setting clearer expectations for suppliers to provide standardised and proportionate, privacy-preserving information about how products are used and any safety concerns. It could also strengthen requirements where pupils' work is used to develop or improve AI tools, ensuring that this is done transparently, protects pupils' rights and best interests, and in a way that supports wider benefit across the education system. We will explore and test further developments to the safety standards through engagement with suppliers, education settings, and other key stakeholders.

Question 25: Do you agree with the proposed certification criteria for student-facing generative AI tools?

- Yes
- No
- Don't know

If no, please explain your answer, including what you would change [Open text 6000 character limit]

Question 26: Please provide any feedback on the generative AI product safety standards.

You may wish to include:

1. Whether any existing standard should be retained, amended or not used for product certification
2. Whether additional standards are required, including on monitoring and reporting and intellectual property
3. Any particular considerations for children with Special Educational Needs and Disabilities (SEND)

[Open text 6000 character limit]

Student-facing personalised learning tools

Student-facing personalised learning tools would be assessed against a modified version of the existing generative AI: product safety standards.

Adaption will be required to make the detail of these standards applicable to student-facing personalised learning tools which do not include a generative AI element. We expect this to focus on harmful design features which add unnecessary pressure, gamification, or seek to prolong engagement without pedagogical justification. Subject to the views shared through this consultation, we will work with a full range of stakeholders to develop the detail for these new standards in advance of implementation through a product certification scheme.

In addition to the standards for EdTech conducting high-risk processing of children's personal data, we expect that suppliers of student-facing personalised learning tools would have to evidence the following criteria:

- **Design and testing** – Prioritise transparency and children's safety in its design, including implementing technical and operational mitigations for identified risks, ensuring child-centred design and operation, and conducting testing with stakeholders, including children, to ensure safety.
- **Governance** – Are operated with accountability, including carrying out risk assessments, instigating formal mechanisms for lodging complaints, and demonstrating that its operations, decision-making processes and data handling practices are understandable and accessible to government agencies and users.

- **Cognitive development** – Mitigate the potential for cognitive deskilling, or long-term developmental harm to learners.
- **Manipulation** – Do not use manipulative or exploitative design features.

This is an area where the evidence base is still developing and we are keen for views on a proportionate response to safeguard children from the risks that design features can pose while allowing the market to provide engaging educational tools which teachers and pupils value.

Question 27: Do you agree with the proposed certification criteria for student-facing personalised learning tools?

- Yes
- No
- Don't know

If no, please explain your answer, including what you would change [Open text 6000 character limit]

Question 28: What features should be included or excluded when considering the impact on children's cognitive development or socio-emotional wellbeing and mental health? For example, around:

- Personalisation and recommendation
- Gamification e.g. rewards, streaks and leaderboards
- Retention e.g. notifications and reminders
- Social interaction and collaboration
- Approach to feedback
- Accessibility and SEND support

Please share any supporting evidence for the risks posed by these features, including any specific impact on children with special educational needs and disabilities.
[Open text 6000 character limit]

Evidence that should be required to show how criteria are met

The scheme will set out the evidence and assurance requirements against the final criteria. Effective assurance typically combines a combination of approaches for testing a product meets the criteria. These could include (but are not limited to):

- **Documentation review**, including evidence provided by suppliers such as risk assessments and governance processes

- **Technical review**, for example of product design, configuration and safety controls to identify vulnerabilities and technical weaknesses
- **Benchmarking**, to understand how well a product performs against pre-defined scenarios or datasets
- **Safeguarding scenario testing,** to determine whether the product's safety controls, escalation pathways, and safeguarding features operate effectively in realistic child-safety scenarios
- **Red teaming**, involving deliberate attempts to misuse or challenge a product in order to identify harms, vulnerabilities and failures that developers did not anticipate

For products still in testing or development, a self-assessment or documentation review could provide a proportionate readiness route ahead of certification – though this wouldn't itself be considered certification. Before deployment at scale, safety-critical functions would then be verified through certification. A threshold would need to be set for "deployment at scale" when certification would be expected.

Where necessary, additional validation could also include product demonstration and/or in-person assessment.

Question 29: How can product certification criteria help education settings understand which products (or configuration of the product) are suitable for different age groups (for example those in post-16 education)?

[Open text 3000 character limit]

Question 30: Where, in some cases, suppliers rely partly on platform and institution-level controls to meet certification criteria, how could they demonstrate that all relevant criteria are met and that the intended safety outcomes are achieved consistently? Please provide examples where possible.

[Open text 6000 character limit]

Question 31: Do you think the assessment approaches described in this section are the most appropriate ways to assess whether products meet the proposed safety criteria?

- Yes
- No
- Don't know

If no, please explain why [Open text 3000 character limit]

Question 32: If a self-assessment readiness route is available for new products in testing and development, at what deployment scale should full certification become the normal assurance method?

Select one option.

- Before deployment to any school or college (so certification would be the normal assurance route from first use)
- When deployed in a certain number of settings
- When deployed with a certain number of users
- This should be determined by risk rather than deployment scale

Please provide more detail e.g. how many settings should a product be deployed in before full certification becomes the normal assurance method [Open text 3000 character limit]

A product certification scheme in practice

Product certification is carried out by independent third parties. The United Kingdom Accreditation Service (UKAS) is appointed by government to assess and accredit organisations that provide certification and to ensure they have the necessary skills, competence, impartiality and integrity. Only conformity assessment bodies (CABs) that meet the relevant requirements can refer to themselves as ‘accredited’, whereas the products successfully audited by conformity assessment bodies hold ‘certification’.

Establishing a product certification scheme

Establishing a product certification scheme requires a scheme owner to define clearly what is being certified (the object of conformity), set the certification criteria, determine how compliance should be demonstrated, specify assessment methodologies and set requirements for product certification and recertification.

Once a product certification scheme has been established and the scheme owner has set the standards and certification requirements, UKAS would review whether the scheme is assessable and suitable for accreditation.

We propose introducing one scheme with different sets of standards for different in-scope product types: filtering products, EdTech conducting high-risk data processing, student-facing generative AI tools, and student-facing personalised learning tools.

UKAS accredits Conformity Assessment Bodies

Once a scheme is recognised as being suitable for accredited conformity assessment, prospective CABs can apply for UKAS accreditation.

UKAS accreditation would establish whether an applicant CAB is competent and impartial to undertake the assessment activity. UKAS charges fees for CABs to become accredited. Any legal entity can be a CAB, including public or private companies or non-profit organisations. They would need to meet the international standard ISO/IEC 17065, requirements for bodies certifying products, and any additional scheme owner requirements (for example relating to technical capabilities or sector knowledge).

A CAB must operate independently and impartially when carrying out assessments and making certification decisions. This means it must be free from conflicts of interest and undue influence from suppliers, product developers, customers, government, or any other party with an interest in the outcome of an assessment.

The scheme owner would then appoint accredited CABs to carry out assessments of in-scope products, in an open, transparent and proportionate process. The scheme rules will publish eligibility, impartiality, performance, audit, suspension and exit requirements.

UKAS would undertake surveillance of accredited CABs to assess their continuing compliance with applicable accreditation requirements. The scheme owner would remain responsible for monitoring CAB compliance with contractual requirements, including appointment and licensing.

CABs certify products

Once accredited by UKAS and appointed by the scheme owner, CABs can then assess in-scope products against the assessment criteria. It is for the product supplier to apply for product certification and this would be subject to a fee to the CAB. CABs are responsible for making individual certification decisions against the criteria set out in the initial scheme design, providing independent assurance that a product has met relevant safety requirements at the point of assessment. If multiple CABs are appointed for one product type, suppliers can choose which they apply to, potentially creating a competitive market.

Settings select certified products

If they meet requirements, products could be certified or visibly 'badged' as meeting the scheme's specified safety criteria relevant for their product type(s). The badge and register could show information such as which product types have been assessed, the CAB who has issued the certificate and the expiry date. Suppliers could then display the badge on their website, for example.

DfE would then maintain a publicly available register of certified products (for example on GOV.UK) so that education settings can select products to meet their needs from this list. We would work with education settings to understand how product certification can be displayed and understood most effectively. There may be opportunities in the future for suppliers to become eligible for DfE-led procurement frameworks through certification.

Scheme ownership

There are multiple options available for the ownership of the product certification scheme. In all circumstances, DfE would have due regard to relevant procurement, subsidy control, competition, information law and public law requirements.

A) DfE owns and manages the scheme

Under this option, DfE holds maximum control over product certification requirements, standards, governance and maintenance, providing resource on an ongoing basis. This could give users greater confidence in the scheme. However, establishing the scheme may take longer because DfE would need to in-house the necessary technical expertise. DfE would have the option of outsourcing some technical drafting if required, while still maintaining ownership.

B) DfE owns the scheme but licenses delivery to third parties

DfE owns the scheme, and, as above, sets the standards and assessment criteria, but licenses delivery to one or more third-party organisations, dependent on the product categories and relevant expertise. Where a scheme covers multiple product categories, one or more organisations could be appointed, potentially as a consortium. Accredited CABs would remain responsible for issuing product certifications. Licensed third-party organisations may also be able to apply for UKAS accreditation and act as CABs, provided they meet the relevant accreditation requirements and demonstrate appropriate structural and informational separation to ensure impartiality.

C) The scheme is fully owned by Conformity Assessment Bodies

CABs would own and operate their own product certification schemes. UKAS-accredited CABs could develop different schemes and approaches, provided these align with DfE's standards that form part of certification criteria.

Preferred approach

Having considered the available ownership models, we consider a DfE-owned and licensed scheme to be the preferred option. It offers the best balance between DfE oversight of standards and governance, and the flexibility and expertise of external delivery partners.

Question 33: Do you agree with the proposed approach that DfE should own the scheme and licence a third-party organisation to deliver the scheme?

- Yes
- No
- Don't know

Please explain your answer [Open text 6000 character limit]

Question 34: Do you think the assurance sector has the necessary expertise and capacity to assess products in each of the four categories proposed for inclusion in the certification scheme, listed below, against the relevant safety criteria?

34a: Filtering products:

- Yes
- No
- Don't know

Please explain your answer [Open text]

34b: EdTech conducting high-risk data processing:

- Yes
- No
- Don’t know

Please explain your answer [Open text]

34c: Student-facing generative AI tools:

- Yes
- No
- Don’t know

Please explain your answer [Open text]

34d: Student-facing personalised learning tools:

- Yes
- No
- Don’t know

Please explain your answer [Open text, 3000 character limit]

Recertification and surveillance requirements

The scheme will set out requirements for when and how product certification needs to be maintained over time.

To provide ongoing confidence that products continue to meet safety requirements rather than just at the initial point of certification, we propose that full recertification (involving a full assessment and evidence exercise) would be required at set, timely intervals.

We propose that full product recertification every 3 years could be a proportionate expectation of products in the filtering, high risk data processing and personalised EdTech categories. Annual surveillance could be carried out by CABs, using targeted checks to verify that certified products continue to meet the relevant assessment criteria within the 3-year window.

For generative AI tools, the pace of change and the risks posed to pupils in education settings means that product recertification may be required more frequently, for example, every year.

For all product types, a new product certification would be required if significant changes are made to a certified product within the fixed window that means it no longer complies

with product certification criteria. Definitions of such changes would be clearly set out in the scheme and would likely include changes that materially affect safety or functionality. Suppliers would be required to notify CABs promptly of any potential material changes to their product, and CABs would then determine if a change meets the threshold for full recertification or a focussed reassessment.

Scheme review

The scheme owner would be responsible for keeping the scheme itself under review and deciding when the standards, certification criteria or assessment process should be updated, for example where the underlying standards, technology or relevant safety risks change.

Following such changes, UKAS would ensure that CABs have the relevant competence to continue carrying out assessments. Certified products would need to be reassessed within a specified timeframe to ensure continuous compliance. DfE would aim to give suppliers ample notice of any forthcoming changes to allow time to modify products. DfE would seek to balance the need to keep certification criteria up to date with the importance of providing certainty for suppliers, minimising unnecessary changes and the need for reassessments.

Compliance and audit

CABs would hold responsibility for investigating complaints or reports of non-compliance after certification. A CAB may suspend or withdraw product certification if a supplier fails to meet the scheme's requirements, if issues are identified during an audit or if the supplier does not take required corrective action within the specified timeframe.

If certification is suspended or withdrawn, including if a product fails recertification, suppliers would be notified of the decision and the reasons for it, and given an opportunity to respond and seek a review or appeal. Education settings would be notified and may be advised to either stop using the product right away, or continue use for a period of time, where immediate withdrawal would create a greater safeguarding or operational risk. Appropriate interim safeguards may be provided. The supplier would no longer be able to claim compliance with the scheme's standards or use the scheme's badge and the product would be removed from the public register.

We are interested in views on what approach would provide appropriate ongoing assurance while remaining proportionate for suppliers.

Question 35: Do you think the suggested approach is appropriate to maintain assurance that certified products continue to meet the scheme's requirements in a fast-developing landscape?

- Yes

- No
- Don’t know

Question 36: Please explain your answer to Q35.

You may want to consider:
1. How often products should undergo full recertification
2. How ongoing surveillance could be approached
3. How ongoing assurance can be provided when products or scheme requirements change
4. What types of product changes should trigger reassessment or full recertification

[Open text 6000 character limit]

Question 37: Is there anything additional we should be aware of to ensure that the approach to recertification is proportionate for suppliers?

[Open text 6000 character limit]

Designing a scheme that is proportionate and practical for suppliers- Section for EdTech suppliers only

Introducing EdTech product certification is intended to establish clear and verifiable expectations for how products support children’s safety, making it easier for education settings to identify and select trusted products, and supporting suppliers to raise the visibility of their products.

However, we recognise that product certification will introduce costs to suppliers and we want to ensure that the product certification scheme is designed in such a way that it is as proportionate and practical for suppliers as possible.

This means establishing a process that is transparent, straightforward to navigate and sufficiently predictable to allow suppliers to prepare in advance. We want to minimise unnecessary barriers so that all products within scope, including those offered by smaller suppliers, new market entrants and businesses developing innovative products, have a realistic route to achieving product certification.

We want to understand whether suppliers of different sizes, and products with different purposes or levels of deployment, could feasibly meet the proposed criteria. The direct cost of a product being certified will depend on the administration of the scheme, determined by the final criteria and assessment approach, and product certification fees would be set by CABs. However, we would expect these fees to be reasonable and proportionate. We also want to understand the potential indirect costs of product

certification, including the time and resources required to gather evidence, prepare for assessment and develop products so they meet the criteria.

We also want to understand what support might be appropriate where particular requirements are consistently more difficult for smaller or early-stage suppliers to meet, for example through targeted guidance or technical assistance. We also want to test whether a staged approach could provide a proportionate route for products that are still being tested or developed. For example, an initial self-service documentation review could allow an early-stage product to demonstrate progress against the criteria, with a full certification assessment required before it is deployed more widely or used at scale.

We expect that the costs of a certification scheme will also be balanced by the clear benefits of suppliers being able to clearly demonstrate their compliance with existing standards and safety expectations, and that product lists and procurement frameworks will help increase the visibility of their products.

Question 38: We aim to design the scheme in a way that minimises additional burden on suppliers. Considering the scheme design and criteria as proposed, please rank the following factors in order of importance (1 being the most important and 6 least important):

- Minimising financial burden
- Allowing adequate lead-in times to modify products
- Minimising administrative burden
- Providing technical guidance and support to meet certification requirements
- Avoiding duplication with existing standards, certifications, or legal requirements
- Ensuring timely and predictable standards updates / recertification requirement
- Something else (please specify what this is and it's level of importance)

Question 39: Taking account of initial and recertification requirements, what is the maximum annual cost of product certification that your organisation would absorb without passing at least some of the cost on to customers?

Select one:

- Less than £2,000
- £2,000 to £4,999
- £5,000 to £10,000
- More than £10,000
- We would need to pass on any additional cost
- Don’t know

Question 40: What types of indirect costs might suppliers incur in preparing for and obtaining product certification?

Please consider costs such as gathering evidence, technical changes to products, and ongoing compliance.

[Open text 6000 character limit]

Question 41: Which of the following measures could reasonably support smaller suppliers, new market entrants and suppliers developing early-stage products to work towards product certification?

Select all that apply:

- An initial self-service or documentation-based assessment for products deployed Below a set threshold
- Templates, examples and self-assessment tools
- Technical support relating to specific criteria
- Reduced certification fees or financial support
- Additional time to meet the certification requirements

Question 42: How much lead time would your organisation need to meet the certification requirements, as currently understood through this consultation and the published standards?

42a: Filtering (including proposed GenAI filtering):

Select one:

- Less than six months
- Six months
- One year
- Eighteen months
- Two years or more
- Don’t know
- Not applicable (We don't provide this type of product)

42b: High-risk data processing:

Select one:

- Less than six months
- Six months

- One year
- Eighteen months
- Two years or more
- Don’t know
- Not applicable (We don't provide this type of product)

42c: Pupil-facing GenAI:

Select one:

- Less than six months
- Six months
- One year
- Eighteen months
- Two years or more
- Don’t know
- Not applicable (We don't provide this type of product)

42d: Pupil-facing personalised EdTech:

Select one:

- Less than six months
- Six months
- One year
- Eighteen months
- Two years or more
- Don’t know
- Not applicable (We don't provide this type of product)

Question 43: What existing standards, frameworks or assurance processes (international or otherwise) do you already comply with? Please include whether they are regulatory or voluntary.

[Open text, 1500 character limit]

Encouraging adoption of a product certification scheme

The purpose of product certification would be to support education settings to more easily make decisions on products that meet safety requirements, rather than increasing burden. We anticipate that where certified products are available, education settings will choose them. At the same time, demand for certified products, driven by clear and consistent expectations of education settings, will create strong incentives for suppliers to demonstrate products meet applicable safety standards.

In line with our existing approach to online safety and digital safeguarding, we propose setting a clear expectation in statutory guidance, including *Keeping Children Safe in Education* statutory guidance, and for early years suppliers, including a corresponding expectation within the *Early Years Foundation Stage statutory framework*. These expectations would set out that, when settings procure or use in-scope higher-risk products, they should obtain proportionate assurance that the product meets the relevant DfE safety standards. Certification, under the proposed DfE scheme, will ordinarily provide that assurance. Alternatively, settings may rely on other credible evidence, along with an explanation of why that evidence is equivalent and any additional safeguards required for the intended use. Settings would need to keep the position under review and act promptly if certification is suspended, withdrawn, or expires.

This would mean that for in-scope products, product certification would become the expected and easiest route in most cases, while still allowing an alternative approach where this is justified and supported by appropriate evidence. For example, a setting could use a non-certified product where its use is necessary for technical, vocational or applied learning, the setting has put safeguards in place and can evidence that the product meets the relevant safety standard through other means. This may be relevant where older children need experience of technologies used in the workplace. This would need to be sufficiently defined so that education settings can evidence the alternatives consistently.

Inspection bodies such as Ofsted could also have a role in supporting this approach through their consideration of safeguarding arrangements. Any approach would consider leaders' decisions, safeguarding culture, and the impact on children and their education outcomes, rather than holding settings responsible for factors such as product failures beyond their control. We will work with inspection bodies and the education sector to understand what would be most effective and proportionate.

DfE could incorporate product certification into relevant procurement frameworks and other solutions by making certification the normal route for demonstrating that in-scope products meet specified safety requirements. Where frameworks list pre-approved suppliers for a service, they could clearly show where an in-scope product meets certification requirements and is included on the public register. Another option is that certification could eventually become a requirement for inclusion in relevant procurement frameworks.

Question 44: Would the proposed approach of including a reference to the scheme within statutory guidance (Keeping Children Safe in Education) meet the goal of ensuring adoption of the scheme?

- Yes
- No
- Don’t know

If no, please explain your answer [Open text 3000 character limit]

Question 45: Do you agree that any proposed expectations on safety certification within KCSIE should be mirrored within guidance for Early Years settings where KCSIE does not apply, so that equivalent expectations apply across all Early Years provision?

- Yes
- No
- Don’t know

Question 46: Would the scheme benefit from inclusion in procurement frameworks and other solutions (in future)?

- Yes
- No
- Don’t know

Please explain your answer [Open text 3000 character limit]

Legislative need

Under these proposals, a product certification scheme is technically non-mandatory. While a clear expectation would be included within statutory guidance, DfE does not have specific powers to require education settings to use certified EdTech products or to require EdTech suppliers to obtain safety certification for their products. .

This approach approach may be preferable initially, allowing time to assess the scheme’s impact, ensure it operates as expected and address any challenges. However, the absence of a legal requirement may lead to reduced uptake and impact. Some education settings may give certification less weight in procurement decisions, while some suppliers may decide not to seek product certification.

We are interested in views on whether legislation may be needed in the future. This could include considering whether DfE should have powers to require certified products to be used in defined circumstances, such as where a product's functions or features, its intended users or use context give rise to particular safety risks for children. Any future move to make use of certified products mandatory would require a new legislative basis and would be supported by further impact analysis.

The sequencing of any expectations introduced through statutory guidance, inspection frameworks and potential future legislative requirements would be carefully managed. We would anticipate an appropriate transition period to allow suppliers sufficient time to obtain product certification, and education settings time to understand forthcoming expectations and take the necessary steps to prepare for and meet them. This approach would also take account of typical procurement and contract cycles for EdTech, and education settings would be able to consider expectations before entering new contracts.

Question 47: Would the product certification scheme benefit from legislative underpinning (in future)?

- Yes
- No
- Don't know

Final thoughts

Before submitting your response, we invite you to reflect on the proposals as a whole and consider the potential risks or unintended consequences of implementing the proposed certification scheme.

Question 48: Considering the proposals as a whole, do you think there are any risks or unintended consequences of implementing the proposed product certification scheme that have not been identified or adequately addressed in this consultation?

- Yes
- No
- Don't know

If yes, please explain what you think these risks are [Open text 6000 character limit]

Question 49: Would you like to add any further comments that have not been covered by other questions?

[Open text 6000 character limit]

What happens next

Thank you for taking the time to respond to this consultation. We will carefully consider all responses received and use the evidence gathered to inform decisions on the future design and implementation of an EdTech Safety product certification scheme. We intend to publish the government response to this consultation in Spring 2027.

Department for Education

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