Riviera Education Trust

Inspiring the individuals of today, for a better society tomorrow

"Aspire, Belong, Collaborate"

RET Ethical AI Protocol

Review Frequency	Annual
Reviewed	December 2025
Next Review	December 2026
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Contents

Introduction

This protocol outlines Riviera Education Trust's approach to the ethical and responsible use of Artificial Intelligence (AI) technologies across our schools. It provides a framework for staff and students to harness the educational and productivity benefits of AI, whilst ensuring data privacy, security, accuracy of information and ethical considerations remain paramount. Guided by core principles of inclusive growth, human-centred values, transparency, robustness, and accountability, this protocol aims to foster a digital ecosystem where AI enhances educational experiences while respecting wellbeing and fundamental rights and values.

At this trust, we recognise the environmental impact caused by the use of generative AI and support its use only when the benefit in terms of workload and support for staff and pupils is warranted.

Purpose and Scope

This protocol applies to students and to anyone working for Riviera Education Trust (RET): teaching staff, non-teaching staff, contractors, volunteers, interns and apprentices. It covers all AI technologies, tools, and systems used for educational, administrative, and operational purposes. The Trust is committed to ensuring AI deployment supports inclusive growth, sustainable development, and well-being across our educational community, whilst complying with all statutory obligations, including those related to safeguarding children.

Definition

An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment (OECD, March 2024).

Examples of AI systems include Virtual Assistants (e.g. Siri, Alexa or Cortana), Chatbots (e.g. ChatGPT, which is a generative Chatbot), recommendation systems (e.g. Netflix) and translation systems (e.g. Google translate). Within education, AI systems can support tasks such as giving feedback and grading (e.g. Olex.ai), generating personalised learning pathways (e.g. Sparx Maths) and creating lesson content (e.g. Socrative AI quiz assist).

Link to Riviera Values

- We have a responsibility to prepare our children for life beyond school so that they can effectively collaborate in the workplace and socially
- Our children must feel that they belong in their community and understand and can partake of all it has to offer
- We aspire for our children to have fulfilling lives and make the most of every opportunity available to them

Protocol

1. Core Principles

a. **Inclusive Growth, Sustainable Development, and Well-being**
   i. AI systems to be deployed to reduce educational inequalities and promote equal access to learning opportunities.
   ii. Prioritisation of AI uses that enhance student/staff achievement and wellbeing.
   iii. Accessibility is required for all AI systems and their use, irrespective of perceived or actual risk. Lack of accessibility jeopardises life, independence, and wellbeing of persons with disabilities. See Annex I for guidance.

b. **Human-Centered Values and Fairness**
   i. All AI systems must respect human rights, dignity, and democratic values.
   ii. AI deployment must not discriminate against any individual or group.
   iii. Special safeguards for vulnerable groups, particularly children with additional needs, must be in place.

c. **Transparency and Explainability**
   i. There should be clear communication to stakeholders about where AI systems are being used and how AI systems operate and make decisions.
   ii. AI systems used for educational decisions must provide explanations for outcomes.
   iii. There should be openness/transparency about use of automated decision making, generalisations and profiling.
   iv. Data subjects (pupils and parents or legal guardians) should understand when their personal data is being processed using AI tools. It is likely that the explicit agreement of data subjects will need to be sought.

d. **Robustness, Security, and Safety**
   i. All AI systems must undergo rigorous security/safety testing.
   ii. Where possible there should be traceability mechanisms to analyse AI outputs if necessary.
   iii. Cybersecurity should be in accordance with government guidance on cybersecurity standards for schools/colleges.

e. **Accountability**
   i. Within schools and RET there should be clear lines of responsibility for AI systems and their outcomes.
   ii. Schools and RET should regularly audit and evaluate the impact of AI on educational outcomes.
   iii. AI-assisted decisions can be appealed using normal processes.

2. Data Privacy Principles

a. **Data Protection Compliance**
   i. All AI use must comply with data protection legislation and RET's Data Protection Policy
   ii. Personal data must not be used in generative AI tools unless strictly necessary. Where needed, it should be collected for specified, explicit and legitimate purposes; anonymised where possible; and processed lawfully, fairly, securely and transparently.
   iii. Where personal data is necessary, additional protections must be implemented; likely to include asking for permission from those whose data is used (staff and students), completing a DPIA and not sharing data outside of closed infrastructure and/or with data centres that aren't compliant under GDPR.

b. **Data Minimisation**
   i. Only collect and process data that is necessary for specified educational purposes.
   ii. Regularly review and delete data that is no longer required. Data should not be kept for any longer than is necessary for the purposes for which it was processed.

c. **Security**
   i. Robust security measures should protect data in AI systems.
   ii. Regular security audits and risk assessments to be conducted.

3. Data Governance

a. **Data Protection**
   i. RET's Data Protection systems must be used to comply with data protection regulations in relation to AI use.
   ii. All significant AI implementations must be reviewed by the DPO process.
   iii. There should be regular data impact assessments for AI systems processing personal data.

b. **Data Processing Agreements**
   i. Ensure all third-party AI providers have appropriate data processing agreements in place.
   ii. Regularly review agreements for compliance with legislation.
   iii. Prioritise providers who demonstrate robust ethical AI principles.

c. **AI Misuse/Data Breaches**
   i. Should be reported using existing systems.
   ii. There should be transparent communication about incidents and remediation actions so that learnings are shared.

4. Safety First Approach

a. **Risk Assessment**

i. All AI use cases[1] must undergo a thorough risk assessment before implementation (see appendix two).

ii. Benefits must clearly outweigh risks for any AI use.

iii. Different considerations will apply depending on whether staff or students are using AI tools.

iv. Risk assessments must include plans for mitigating unauthorised use cases (e.g. generating misleading emails).

v. The Ethical Framework for AI in Education supports the above.

b. **Approved Use Cases**

i. Schools and RET will highlight suitable use cases for AI tools, and associated risk assessments (see 6ai below).

ii. Schools and/or RET may specify whether AI tools can be used only by teachers, only for administrative tasks, and/or by students in particular subjects, year groups, key stages or settings.

iii. AI use in assessment, recruitment, or administrative decision-making must be risk assessed and documented.

iv. Use cases and their associated risk assessments will be reviewed by a newly formed RET AI Committee, comprising of school IT leads, the IT technical team and a member of the Trust Leadership Team.

c. **Student Safeguards**

i. Students will only use generative AI in educational settings with appropriate safeguards in place.

ii. Supervision will be required for student AI use. This could be asynchronous, e.g.: reviewing transcripts of students' conversations with age appropriate AI or looking at the outcomes from Times tables Rock Stars homework.

iii. Appropriate filtering and monitoring approaches must apply to the AI tools used by students, whether that is through the AI tool (e.g. within Google Gemini) or wider (e.g. SENSO).

iv. AI tools used by students must comply with age restrictions set by the providers. NB – Many AI systems have a 13+ age limit and will not be suitable for use by primary aged pupils.

v. Online safety considerations, including AI-specific risks, will be incorporated into safeguarding policies/procedures.

[1] A working definition of an AI 'use case' is: A specific scenario or problem where AI techniques can be applied to solve a problem, improve a process or achieve a desired outcome. Use cases are therefore broader than individual tasks. For example, using AI to generate a PowerPoint from a selection of 'I can …' statements in the Programme of Study is part of a use case to do with using AI to create learning resources.

5. Intellectual Property Considerations

a. **Copyright Protection**
   i. Materials protected by copyright will only be used to train AI if permission from the copyright holder is obtained or a statutory exception applies.
   ii. Materials created by pupils and teachers may constitute copyright material.

b. **Permission Requirements**
   i. RET will not allow or cause students' original creative work to be used to train generative AI models unless explicit permission is obtained, or an exception to copyright applies.
   ii. Permission must be obtained from the student as copyright owner or from the student's parent/legal guardian if the student is a minor.

c. **Secondary Infringement Prevention**
   i. Schools and RET should take measures to prevent secondary copyright infringement that could occur if AI products trained on unlicensed material are used in educational settings or published more widely.
   ii. All AI-generated content should be reviewed for potential copyright issues before publication.

6. Staff Guidelines for AI Use

a. **Teaching Staff**
   i. May, further to the guidance above, use AI tools to enhance lesson planning, create personalised learning materials, generate ideas, conduct basic research, complete language translation and/or support proofreading. The PAIR framework can support the choice/use of appropriate AI tools[2].
   ii. Must review and validate all AI-generated content for accuracy before sharing with students.
   iii. Should use AI to support, not replace, professional judgment.
   iv. Must not input sensitive student/staff data into public AI tools.
   v. Should document use of AI in creating educational materials when substantial.
   vi. Are encouraged to leverage AI to develop inclusive teaching materials that address diverse learning needs and are linked to RET's Programmes of Study.
   vii. Must monitor for sudden changes in student work that suggest AI misuse e.g. work that is suddenly better than previously seen, Americanisation of language, other hallmarks of AI-generated content.

b. **Non-Teaching Staff** …

[2] Recent research suggests teachers who used generative AI to challenge/augment their schemes of learning, as well as to create lesson resources, felt it aided their productivity; those who only used it to help create lesson resources did not.

i. May, further to the guidance above, use AI tools for administrative tasks, data analysis (as long as anonymised), generating ideas, conducting basic research, supporting proofreading and communications. The PAIR framework can support the choice/use of appropriate AI tools.
ii. Must ensure confidential information remains secure when using AI systems.
iii. Should maintain human oversight of AI-assisted processes, particularly for decisions affecting individuals.
iv. Should use AI to improve efficiency while maintaining human connection and relationships.

7. Student Guidelines for AI Use

a. **Unless specifically told not to by teachers**, students can use AI tools to generate data/content (text, video, audio, images) subject to the principles and guidelines elsewhere in this document and when using age-appropriate tools. This will not normally be appropriate in primary schools.

b. **Permitted Uses**
   i. Research and information gathering (with appropriate citation).
   ii. Writing assistance (e.g., grammar checking, rephrasing).
   iii. Creative idea generation.
   iv. Self-directed learning and personalised practice.
   v. Assistive technology for students with additional needs.
   vi. Gaining feedback on work.

c. **Prohibited Uses**
   i. Submitting AI-generated work as entirely their own.
   ii. Using AI to generate coursework or exam content.
   iii. Using AI to bypass learning processes.
   iv. Sharing personal information with public AI tools.
   v. Using AI in assessment settings unless explicitly permitted.
   vi. Using AI that is not permitted due to age restriction.

d. **Digital Literacy**
   i. To enable students to evaluate AI-generated content they will, within the RET Curriculum, receive age-appropriate education on: AI capabilities, limitations, misinformation and ethical considerations; critical thinking; and digital literacy skills.
   ii. Students will learn to question and challenge AI-generated outcomes where appropriate.

8. Parental Engagement

a. Schools are to provide guidance to parents on how AI is being used in the Trust's schools using existing communication channels.

b. Schools and RET should consider creating resources to help parents understand and support appropriate AI use at home.
c. Parents should be able to use existing channels to raise concerns about AI use.

9. Training and Support

a. Training will be provided for staff by schools on ethical AI use, data privacy, the use of AI to support inclusive educational practices and emerging AI technologies and practices.
b. Support resources will be created for students on appropriate AI use and explicit teaching regarding safe, ethical, impactful AI use will be built into the RET Curriculum.

10. Fostering a Digital Ecosystem for Trustworthy AI

a. **AI Research and Development**
    i. RET encourages collaboration with educational partners on AI research relevant to primary and secondary education, including participation in AI related research projects that benefit educational outcomes.
    ii. RET encourages innovation in developing AI applications for educational contexts.
    iii. Exemplary practice with regards to AI within education should be recognised and shared across the Trust.
b. **Knowledge Sharing**
    i. Established mechanisms must be used for sharing best practices in AI use across RET schools (e.g. subject networks & IT Leads network)
    ii. RET will create and support communities of practice for staff to collaborate on ethical AI implementation
    iii. RET staff are encouraged to share insights and learnings with the broader educational community.

11. Infrastructure Development

a. RET and schools will invest in appropriate technological infrastructure to support ethical and equitable AI use where budgets allow.
b. Regular audits of existing infrastructure will consider how to accommodate emerging AI technologies.
c. Regular cybersecurity audits will be carried out by IT teams to monitor AI-related risks.

Protocol Review

This protocol will be reviewed annually or more frequently as AI technologies evolve to ensure it remains current and effective. Reviews will consider emerging international standards, government guidance (including updates from DfE, KCSIE and JCQ), and best practices. Reviews should seek opinions of staff and students.

Links

This Ethical AI Protocol should be read and considered alongside other school and trust policies and guidance (most available here), including:

- Child Protection and Safeguarding Policy
- Data Protection Policy
- Staff Code of Conduct/Disciplinary Policy

Or via the individual schools' websites.

Appendix 1: AI Assessment Scale

Scale Levels and Descriptions

1	**NO AI**	The assessment is completed entirely without AI assistance. This level ensures that students rely solely on their knowledge, understanding, and skills. **AI must not be used at any point during the assessment.**
2	**AI-ASSISTED IDEA GENERATION AND STRUCTURING**	AI can be used in the assessment for brainstorming, creating structures, and generating ideas for improving work. **No AI content is allowed in the final submission.**
3	**AI-ASSISTED EDITING**	AI can be used to make improvements to the clarity or quality of student created work to improve the final output, but no new content can be created using AI. **AI can be used, but your original work with no AI content must be provided in an appendix.**
4	**AI TASK COMPLETION, HUMAN EVALUATION**	AI is used to complete certain elements of the task, with students providing discussion or commentary on the AI-generated content. This level requires critical engagement with AI generated content and evaluating its output. **You will use AI to complete specified tasks in your assessment. Any AI created content must be cited.**
5	**FULL AI**	AI should be used as a 'co-pilot' in order to meet the requirements of the assessment, allowing for a collaborative approach with AI and enhancing creativity. **You may use AI throughout your assessment to support your own work and do not have to specify which content is AI generated.**

Table 1 The AI Assessment Scale

Source: https://open-publishing.org/journals/index.php/jutlp/article/view/810/769

Appendix 2: Sample Use Case Risk Assessment

Use case: Use of generative AI to support lesson planning

Risk	Potential Impact	Mitigation Measures
1. Inaccurate or Biased Content (Aligned with Framework §§1, 4, 7)	• Lesson plans may contain factual errors or propagate stereotypes. • Learners receive misleading, unbalanced or inappropriate information due to a lack of education specific guardrails. • Erodes educational credibility and trust.	• Require teachers to verify AI-generated content against trusted curricula and subject-specific resources. • Maintain a checklist of reputable sources; cross-reference AI suggestions with BET PoS and KOs. • Pilot AI outputs in small cohorts before full adoption.
2. Over-Reliance on AI & Diminished Teacher Expertise (Aligned with Framework §§3, 8)	• Teachers may defer pedagogical judgment to AI, reducing professional development. • Risk of one-size-fits-all planning; less differentiation for individual student needs. • Potential decline in lesson quality over time.	• Embed AI as a supportive tool, not a substitute for professional expertise. • Provide mandatory training: interpreting AI suggestions, identifying limitations, adapting to learner contexts. • Schedule periodic peer-review of AI-informed lesson plans. • Monitor teacher engagement in lesson design; flag excessive AI dependence.
3. Data Privacy & Pupil Confidentiality (Aligned with Framework §6)	• Unauthorised disclosure of student data if input into AI systems. • Breach of GDPR and Age Appropriate Design Code; legal and reputational repercussions. • Loss of stakeholder trust.	• Prohibit entry of identifiable pupil information into AI tools. • Use anonymised or aggregate data only; develop a “data sanitisation” protocol before any AI interaction. • Regularly audit usage logs.

Risk	Potential Impact	Mitigation Measures
4. Equity & Accessibility Concerns (Aligned with Framework §4)	• AI outputs may not account for pupils with SEN or EAL, leading to unequal learning opportunities. • Digital divide: teachers without sufficient devices or skill unable to leverage AI effectively. • Exacerbates existing attainment gaps.	• Ensure AI recommendations include differentiation strategies for diverse learner needs. • Provide alternative planning templates for teachers with limited access to AI tools and training for those with lower skill levels. • Develop a "digital access support" plan: loan devices, offer dedicated planning time in school ICT suites. • Regularly review AI outputs for equity biases; involve SENCO and EAL, co-ordinator in oversight.
5. Unauthorised or Malicious Use (e.g., Misleading Emails) (Aligned with Framework §§7, 9)	• Staff identity theft: phishing or misinformation sent under official guise. • Damage to school's reputation; potential safeguarding risks. • Compromised trust between staff, parents, and pupils.	• Restrict AI tool access to approved staff accounts; enforce strong, unique passwords and MFA. • Monitor network logs and AI-tool audit trails for anomalous usage patterns. • Provide staff training on recognising and reporting AI-generated phishing attempts
6. Intellectual Property & Copyright Infringement (Aligned with Framework §9)	• AI-produced materials may inadvertently infringe third-party copyrights. • School becomes liable for unlicensed content; legal action and financial penalties. • Erodes ethical standards and trust with content creators.	• Instruct teachers to flag any AI-provided content needing copyright clearance before use. • Compile a list of open-license resources; encourage AI prompts that reference Creative Commons or public domain materials. • Conduct quarterly spot-checks on AI-sourced lesson materials for compliance. • Require AI vendors to certify their model training data adheres to copyright law.

DETAILS OF AMENDMENTS

December 2025

- New policy adopted.