



Project Nr. 2024-1-SE01-KA220-SCH-000243601

Transforming Education, Embracing Diversity

WP4 ACTION PLAN

Putting Responsible and Inclusive AI Policy into Practice

A concrete roadmap for education authorities, schools and partner organisations

Action plan purpose

To convert the BridgeAI Policy Reform Report into assigned, time-bound and measurable actions that schools and education authorities can implement, monitor and improve.



**Co-funded by
the European Union**

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them

Executive implementation summary

This Action Plan accompanies the BridgeAI WP4 Policy Reform Report. It translates eight policy recommendations into a 24-month implementation programme for European and national authorities, regional and local education bodies, schools, teachers, students, civil society and technology providers.

Implementation rule

No AI use should be scaled because it is novel or popular. Scale only when a defined educational or inclusion need is met, safeguards are operational, teachers and learners are prepared, and monitoring shows benefit without disproportionate harm.

The five implementation phases

Phase	Timing	Main result
1. Establish	Months 0-3	Governance, ownership, baseline inventory and interim safeguards.
2. Prepare	Months 3-6	Policies, approved-tool criteria, training and AI-literacy design.
3. Pilot	Months 6-12	Limited, inclusion-focused pilots with evidence collection.
4. Evaluate	Months 12-18	Independent review, corrective action and scale/stop decisions.
5. Embed	Months 18-24	Sustainable integration, annual reporting and continuous improvement.

Eight strategic objectives

1. Create accountable, rights-based AI governance.
2. Protect children's data through privacy-by-design.
3. Guarantee progressive AI literacy for every learner.
4. Build sustained workforce competence and support.
5. Use AI to advance inclusion and equal access.
6. Ensure transparency, fairness and meaningful human oversight.
7. Modernise assessment and academic-integrity practice.
8. Institutionalise student, family and community participation.

1. Scope, ownership and implementation principles

1.1 Scope

The plan applies to AI used for teaching, learning, assessment support, accessibility, translation, administration, guidance, analytics and communication in school education. It covers institutionally provided systems and public tools used by staff or learners for school-related purposes.

1.2 Governance levels

Level	Primary ownership
European / transnational	Common guidance, knowledge exchange, funding, shared competence resources and comparable indicators.
National ministry / regulator	Minimum standards, curriculum outcomes, legal alignment, funding, oversight and national monitoring.
Regional / local authority	Procurement support, approved-tool lists, training networks, DPO expertise and coordinated pilots.
School / institution	Local protocol, educational-purpose decisions, staff/student preparation, supervision and incident response.

Classroom / learner	Responsible use, disclosure, verification, reflection, feedback and compliance with agreed boundaries.
---------------------	--

1.3 Non-negotiable principles

Educational purpose before technology selection.

Human responsibility for every consequential decision.

Children's rights, safety and best interests.

Data minimisation and secure, approved systems.

Equal access and testing for differential impacts.

Clear information, contestability and remedy.

Student participation and age-appropriate agency.

Evidence-based scale, revision or discontinuation.

2. Roles and accountability

Actor	Accountable for	Minimum concrete responsibility
National ministry	Policy floor and curriculum	Issue minimum AI standards, define AI-literacy outcomes, fund implementation and publish annual national findings.
Data-protection / regulatory bodies	Lawful and rights-respecting use	Provide education-specific guidance, support impact assessments and investigate serious non-compliance.
Regional/local authority	Operational enablement	Coordinate procurement, approved tools, training, accessibility support, legal advice and incident escalation.
School governing body / leader	Institutional compliance and learning quality	Approve the school protocol, appoint the AI lead, allocate resources, review pilots and report annually.

School AI governance group	Day-to-day governance	Maintain inventory, review use cases, consult stakeholders, assess risks, monitor KPIs and recommend scale/stop decisions.
Teachers	Pedagogical use and learner supervision	Define purpose, teach responsible use, verify outputs, redesign assessment and report incidents.
Students	Responsible participation	Follow rules, disclose use, protect data, verify information and participate in review.
Families / civil society	Community assurance	Contribute inclusion knowledge, raise concerns and participate in annual review.
Technology providers	Safe and transparent product operation	Document data flows and limits, support deletion/audit, meet accessibility requirements and report incidents.

Named ownership required

Every participating authority and school should identify one accountable lead and one deputy. Collective responsibility without a named owner is not sufficient.

3. Strategic implementation measures

The action codes below should be retained in local plans and monitoring reports so progress can be compared across organisations.

SO1. Rights-based governance

Create a clear decision structure so every AI use has a purpose, owner, risk classification and review route.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
1.1 Publish a national/regional minimum framework defining permitted, conditional and prohibited educational AI uses.	Ministry / authority; legal, DPO and education experts	M0-6	Framework published; review cycle and complaint route defined.
1.2 Establish a school AI governance group and appoint an AI lead and deputy.	School leader / governing body	M0-3	Named group; terms of reference; meeting calendar.
1.3 Complete a baseline inventory of AI tools and use cases, including informal staff and student use.	School AI lead; IT and teachers	M0-3	100% of known tools logged with purpose, users, data and status.
1.4 Adopt an accessible school AI protocol and communicate it to staff, students and families.	School governing body	M3-6	Protocol approved; translated/accessible versions issued; acknowledgement recorded.

SO2. Privacy-by-design and secure procurement

Prevent unnecessary exposure of children's personal data and ensure only suitable systems are institutionally approved.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
2.1 Create an approved-tool assessment covering data flows, legal basis, age terms, security, retention, subprocessors, model training and deletion.	Authority procurement + DPO	M0-6	Assessment template used for 100% of institutionally approved tools.
2.2 Perform DPIA and child-rights/equity assessment for high-impact or sensitive use cases before pilot approval.	Controller / DPO; inclusion lead	Before use	Assessment signed; risks reduced to accepted level; residual risks recorded.
2.3 Configure systems for minimum data collection, restricted access, short retention and deletion at exit.	IT lead / provider	M3-9	Configuration evidence; access review; deletion test completed.
2.4 Train all users never to enter identifiable or sensitive learner information into	School AI lead / teachers	M3-6 and annual	90% staff completion by M6; student instruction before first use.

unapproved public AI services.			
--------------------------------	--	--	--

SO3. AI literacy for every learner

Provide age-appropriate knowledge and skills for critical, ethical and responsible AI use.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
3.1 Define age-banded outcomes covering AI basics, prompting, verification, bias, privacy, authorship, misinformation, rights and civic participation.	Ministry / curriculum body	M3-9	Outcomes mapped to curriculum stages and subjects.
3.2 Integrate BridgeAI resources into at least three curriculum areas rather than isolating AI in computing alone.	School curriculum team	M6-12	Three subject mappings; lesson plans and assessment evidence.
3.3 Require learner reflection and disclosure whenever AI materially contributes to assessed work.	Schools / teachers	M6 onward	Common disclosure method used; learner reflection sampled termly.
3.4 Provide accessible and multilingual learner guidance, including	Authority / schools / students	M3-9	Guidance tested with target learners and published in needed formats.

examples of safe and unsafe practice.			
---------------------------------------	--	--	--

SO4. Workforce capacity and professional support

Ensure leaders, teachers and support staff can make informed decisions and use AI without weakening professional judgement.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
4.1 Run role-specific foundational training: governance for leaders; pedagogy and assessment for teachers; accessibility/safeguarding for support staff.	Authority training lead	M3-9	90% target staff trained; pre/post confidence and knowledge recorded.
4.2 Create a helpdesk or named support route for pedagogy, data protection, accessibility and technical issues.	Regional/local authority	M3-6	Response route published; 80% queries answered within agreed SLA.
4.3 Establish peer learning communities and termly practice reviews using BridgeAI cases.	School networks	M6-24	At least one session per term; resources and decisions documented.

4.4 Allocate protected time for teachers to plan, test and evaluate AI-supported learning.	School leaders / authorities	M6 onward	Time allocation recorded; workload impact reviewed termly.
--	------------------------------	-----------	--

SO5. Inclusion and equal access

Prioritise AI uses that remove barriers for multilingual, migrant/refugee, disabled and socioeconomically disadvantaged learners.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
5.1 Select pilot problems through an inclusion-needs assessment, not through vendor availability.	School inclusion lead + students	M3-6	Needs assessment completed; priority group and expected benefit defined.
5.2 Pilot translation, simplification or accessibility support with a human review step and non-AI alternative.	Teachers / support specialists	M6-12	Pilot protocol; baseline and outcome data; alternative route available.
5.3 Test outputs and user experience across relevant languages, disabilities, genders and backgrounds.	Authority / researchers / civil society	M6-15	Disaggregated error and experience findings; corrective action log.

5.4 Provide devices, connectivity, accessible formats and supervised access where home access is unequal.	Authority / school	M3-18	Access gaps measured and reduced; no required task depends on private paid access.
---	--------------------	-------	--

SO6. Transparency, fairness and human oversight

Make AI involvement visible, reviewable and challengeable, especially when it may affect learner opportunities.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
6.1 Publish plain-language notices explaining where AI is used, its purpose, data, limits, human reviewer and challenge route.	Controller / school	Before use	Notice available to every affected user in accessible form.
6.2 Prohibit fully automated decisions on admission, placement, grading, progression, discipline or support eligibility.	Ministry / school governing body	Immediate	Prohibition included in policy; audit finds zero fully automated consequential decisions.
6.3 Define human review standards: competence, evidence checked, override	Authority / school AI group	M3-6	Review checklist used for all consequential AI-supported decisions.

power, documentation and escalation.			
6.4 Monitor differential performance and suspend systems where material bias or unexplained harm persists.	Authority / independent reviewer	Termly	Fairness review completed; suspension threshold and decisions documented.

SO7. Assessment and academic integrity

Preserve genuine evidence of learning while teaching responsible and transparent use.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
7.1 Classify assessment tasks as AI-prohibited, AI-limited or AI-integrated, and state conditions before work begins.	School assessment lead / teachers	M3-9	100% selected assessments labelled; rules communicated.
7.2 Redesign selected assessments to include drafts, oral defence, process evidence, reflection or authentic application.	Subject teams	M6-12	At least two redesigned tasks per participating subject; moderation completed.
7.3 Adopt a proportionate	School governing body	M3-6	Procedure approved; staff trained; all cases

investigation procedure; automated AI-detection scores cannot be sole evidence of misconduct.			include human evidence review.
7.4 Evaluate whether AI use strengthens or weakens independence, critical thinking and subject mastery.	Teachers / researchers	M6-18	Learning evidence compared with baseline; scale/stop recommendation.

SO8. Student and community participation

Make learners and affected communities regular contributors to AI governance, not one-time consultees.

ID / concrete action	Lead / support	Timing	Deliverable and KPI
8.1 Reserve student representation on the school AI governance group, with age-appropriate preparation and safeguarding.	School leader / student council	M0-3	At least two student voices or equivalent representation mechanism.
8.2 Consult migrant/refugee learners, students with disabilities and families using accessible and multilingual methods.	Inclusion lead / civil society	Before pilot and annually	Participation profile recorded; barriers and requested changes documented.

8.3 Publish a 'you said - we did' response after consultations and explain recommendations not adopted.	School AI lead	Within 30 days	Response published; actions assigned and tracked.
8.4 Create an easy reporting route for harmful, biased, inaccurate or privacy-invasive AI outputs.	Safeguarding lead / DPO	M3-6	Child-friendly route available; acknowledgement within 2 working days.

4. Phased 24-month roadmap

Phase	Mandatory actions	Decision gate
Phase 1: Establish M0-3	Name accountable leads; create governance group; inventory all current tools/use cases; issue interim ban on sensitive data in unapproved tools; establish student representation.	Proceed only when ownership, inventory and immediate safeguards are documented.
Phase 2: Prepare M3-6	Approve school protocol; define tool-assessment and DPIA routes; publish notices and complaint channels; launch staff training; select inclusion need for pilot.	Pilot only when tool, purpose, data, human oversight, access and baseline measures are approved.

Phase 3: Pilot M6-12	Run limited inclusion and learning pilots; teach AI literacy; redesign selected assessments; collect learning, equity, workload, safety and participation data.	Continue only if no critical safeguard failure and early evidence justifies completion.
Phase 4: Evaluate M12-18	Independent or cross-institution review; audit privacy, accessibility, bias, learning and workload; consult users; implement corrective actions.	Decide scale, revise, pause or stop for each use case using published criteria.
Phase 5: Embed M18-24	Scale effective uses; integrate curriculum and CPD; publish annual transparency report; update procurement and policy; agree sustainability budget.	Institutionalise only where ownership, funding, competence and annual review are secured.

5. Resources and indicative budget structure

The Action Plan does not prescribe a single budget because education systems differ. Every implementing body should nevertheless budget for the following cost categories before approving pilots.

Resource category	Minimum provision	Indicative allocation of local implementation budget
Governance and legal	AI lead time, DPO/legal support, policy drafting, impact assessments and review meetings.	10-15%
Professional development	Foundational and advanced training, facilitation, protected teacher time and peer learning.	20-30%

Infrastructure and access	Approved licences, devices, connectivity, secure accounts, accessibility and technical support.	25-35%
Curriculum and assessment	Resource adaptation, translation, accessible formats, lesson design and moderation.	10-15%
Monitoring and evaluation	Baseline tools, data collection, independent review, student consultation and reporting.	10-15%
Contingency / remediation	Incident response, replacement tools, security fixes and additional inclusion measures.	5-10%

Budget safeguard

Do not finance licences without also financing training, accessibility, governance and evaluation. Technology-only budgets create unmanaged implementation risk.

6. Monitoring and evaluation framework

Indicator	Definition / target	Source	Frequency	Owner
KPI 1 Governance coverage	100% participating schools have an AI lead, governance group, protocol and annual review.	Appointment and policy records	Annual	Authority / school leader

KPI 2 Tool assurance	100% institutionally approved tools complete the required assessment; 100% high-impact uses complete DPIA/rights review.	Tool register and assessments	Before approval / annual	DPO / procurement
KPI 3 Workforce readiness	At least 90% target staff complete core training; at least 80% report adequate support.	Training and staff survey	Termly / annual	Training lead
KPI 4 Learner literacy	At least 80% of sampled learners demonstrate expected age-level verification, privacy and disclosure competences.	Tasks, rubrics and learner survey	Termly	Curriculum lead
KPI 5 Equal access	No required activity depends on private paid access; identified device/connectivity/accessibility gaps have funded response.	Access audit	Termly	Inclusion / IT lead
KPI 6 Inclusion impact	Pilot shows defined benefit for target learners without materially worse errors or experience for a subgroup.	Baseline and disaggregated outcome data	Per pilot	Evaluation lead

KPI 7 Safety and privacy	All incidents logged; serious incidents escalated immediately; corrective action completed within agreed deadline.	Incident register	Continuous / quarterly	Safeguarding / DPO
KPI 8 Human oversight	Zero fully automated consequential decisions; 100% sampled AI-supported decisions show documented human review.	Decision audit	Termly	School leader / authority
KPI 9 Participation	Students and affected groups consulted before pilots and annually; response to feedback published within 30 days.	Consultation record	Per pilot / annual	AI governance group
KPI 10 Transparency	Annual public summary reports uses, benefits, incidents, changes and discontinued systems.	Published report	Annual	Accountable lead

6.1 Scale, revise, pause or stop criteria

Decision	Minimum evidence
----------	------------------

Scale	Educational/inclusion benefit demonstrated; safeguards functioning; equitable access; acceptable workload/cost; users prepared; no unresolved high risk.
Revise	Benefit plausible but limited by fixable design, training, accessibility, configuration or implementation problems.
Pause	Evidence incomplete; significant concern under investigation; vendor or legal change affects assurance; required human support unavailable.
Stop	Serious or repeated privacy/safety failure; persistent discriminatory impact; no meaningful benefit; loss of human control; unacceptable cost or workload.

7. Risk register and mitigation

Risk	Early warning	Preventive / corrective action	Owner
Unapproved or informal use	Unknown tools appear in assignments or staff workflows.	Inventory, approved-tool list, practical alternatives, training and proportionate enforcement.	School AI lead

Personal-data exposure	Users enter names, images, grades, health or behavioural data.	Technical blocking where possible, explicit prohibition, training, incident response and deletion request.	DPO / IT
Bias or exclusion	Different error rates, poor translation or negative experience for a subgroup.	Pre-deployment testing, disaggregated monitoring, affected-user review, correction or suspension.	Inclusion / evaluation lead
Misinformation	Fabricated facts, sources or unsafe recommendations appear in learning.	Verification instruction, source requirements, teacher review and restricted high-risk topics.	Teacher / curriculum lead
Overdependence	Declining independent reasoning, writing or problem-solving.	Task redesign, AI-free practice, oral/process evidence and limits on use.	Teachers
Assessment disputes	Unclear rules or overreliance on AI-detection scores.	Task classification, prior communication, human evidence review and appeal route.	Assessment lead
Teacher workload	Preparation, checking and troubleshooting exceed benefit.	Protected time, shared resources, helpdesk, scope reduction or discontinuation.	School leader
Digital inequality	Paid accounts, devices, connectivity or inaccessible interfaces exclude learners.	Institutional access, accessible alternatives, supervised use and	Authority / inclusion lead

		procurement requirements.	
Vendor change or lock-in	Terms, model, data location, price or service change unexpectedly.	Contractual notice, annual reassessment, export/deletion ability and exit plan.	Procurement / DPO
Low stakeholder trust	Complaints, low uptake or misunderstanding of purpose.	Plain-language notices, participation, transparency reporting and visible corrective action.	Accountable lead

8. School-level 90-day start-up plan

Deadline	Required action	Completion evidence
Days 1-10	Appoint AI lead and deputy; identify DPO, safeguarding, IT, curriculum, inclusion and student representatives.	Named contacts and governance chart.
Days 1-30	Inventory current tools and uses; issue immediate data and assessment safeguards; establish incident route.	Tool/use register; interim notice; reporting link.
Days 15-45	Prioritise one educational or inclusion need; document baseline; identify non-AI alternative.	Needs statement and baseline record.
Days 30-60	Assess proposed tool; complete legal, privacy, accessibility, equity and security checks.	Signed assessment and approval/rejection decision.

Days 30-75	Draft and approve school protocol; provide staff foundation training; prepare learner/family guidance.	Approved protocol, attendance and guidance materials.
Days 60-90	Consult affected learners and families; finalise pilot protocol, success criteria and stop conditions.	Consultation response and pilot authorisation.

9. Required implementation records

AI tool and use-case register.

Use-case proposal and educational-purpose statement.

Tool assurance / procurement assessment.

Data-protection, child-rights and equity impact assessments where required.

School AI protocol and approved-use guidance.

Training register and competence evaluation.

Pilot plan, baseline, outcome measures and scale/stop decision.

Incident, complaint, appeal and corrective-action register.

Student, family and stakeholder consultation record.

Annual AI transparency and impact summary.

10. Sustainability and transfer

Sustainability depends on embedding ownership, competence and review into normal education governance rather than maintaining AI as a temporary project activity. After the initial 24 months, authorities and schools should include AI governance in annual improvement planning, induction and CPD, curriculum review, procurement, safeguarding, data protection and quality assurance.

Sustainability measure	Requirement after Month 24
Policy maintenance	Annual review and rapid update after legal, vendor, security or major technological change.

Workforce renewal	AI governance and responsible-use modules included in induction; refresher training at least annually.
Financial continuity	Recurring budget for secure access, inclusion, support, evaluation and contingency.
Knowledge transfer	BridgeAI resources, cases and templates available in accessible and partner-language formats.
Cross-country learning	Annual partner or network exchange on incidents, effective practice, policy change and evidence.
Public accountability	Annual summary remains available to students, families, staff and authorities.

11. Conclusion

The BridgeAI Action Plan turns responsible and inclusive AI from a statement of intent into a managed programme of work. It assigns ownership, places safeguards before deployment, gives teachers and learners the preparation they need, and requires evidence before scale.

Final implementation test

Before approving any action, ask: Who owns it? By when? With what resources? What evidence will prove completion? How will learners know and participate? What would cause us to pause or stop?

References

BridgeAI consortium (2024). Erasmus+ KA220-SCH application: TrAnsformIng Education, Embracing Diversity.

BridgeAI consortium (2026). WP4 Methodology: Forming a Comprehensive Proposal for Policy Reform and Action Plan.

BridgeAI consortium (2026). WP4 Policy Reform Report: Responsible and Inclusive Artificial Intelligence in School Education.

European Commission. Digital Education Action Plan 2021-2027.
<https://education.ec.europa.eu/focus-topics/digital-education/actions>

European Union (2024). Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence. <https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng>

European Union (2016). Regulation (EU) 2016/679 (General Data Protection Regulation).
<https://eur-lex.europa.eu/eli/reg/2016/679/oj>

UNESCO (2023). Guidance for generative AI in education and research.
<https://unesdoc.unesco.org/ark:/48223/pf0000386693>

Appendix A. One-page use-case approval checklist

Check	Approval question	Status / evidence
-------	-------------------	-------------------



Co-funded by
the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them

Need	Is the educational or inclusion problem clearly defined?	☐ Complete ☐ Action needed
Necessity	Is AI demonstrably preferable to a safer, simpler non-AI option?	☐ Complete ☐ Action needed
Ownership	Are accountable lead, operational owner and human reviewer named?	☐ Complete ☐ Action needed
Users	Are age, needs, vulnerabilities and affected groups identified?	☐ Complete ☐ Action needed
Data	Are data types, legal basis, location, retention, access and deletion understood?	☐ Complete ☐ Action needed
Rights	Are privacy, child rights, equality, accessibility and participation assessed?	☐ Complete ☐ Action needed
Accuracy	How will outputs, sources, translation and differential errors be checked?	☐ Complete ☐ Action needed
Oversight	Can a competent person review, override, explain and document decisions?	☐ Complete ☐ Action needed
Access	Can every required learner participate without private payment or inaccessible tools?	☐ Complete ☐ Action needed

Transparency	Will users understand when AI is used, why, its limits and how to challenge it?	☐ Complete ☐ Action needed
Evidence	Are baseline, success indicators, monitoring frequency and evidence sources defined?	☐ Complete ☐ Action needed
Exit	Are pause/stop thresholds, incident route, deletion and provider-exit arrangements ready?	☐ Complete ☐ Action needed

Erasmus+ KA220-SCH | TrAnsformIng Education, Embracing Diversity

Appendix B. Local action tracker template

Action ID	Local task	Owner	Deadline	KPI / evidence	Status
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress / Complete / Blocked
					Not started / In progress /

					Complete / Blocked
					Not started / In progress / Complete / Blocked

Recommended status definitions: Not started - no action initiated; In progress - owner and next step confirmed; Complete - evidence verified; Blocked - escalation and resolution date recorded.

Project Nr. 2024-1-SE01-KA220-SCH-000243601

