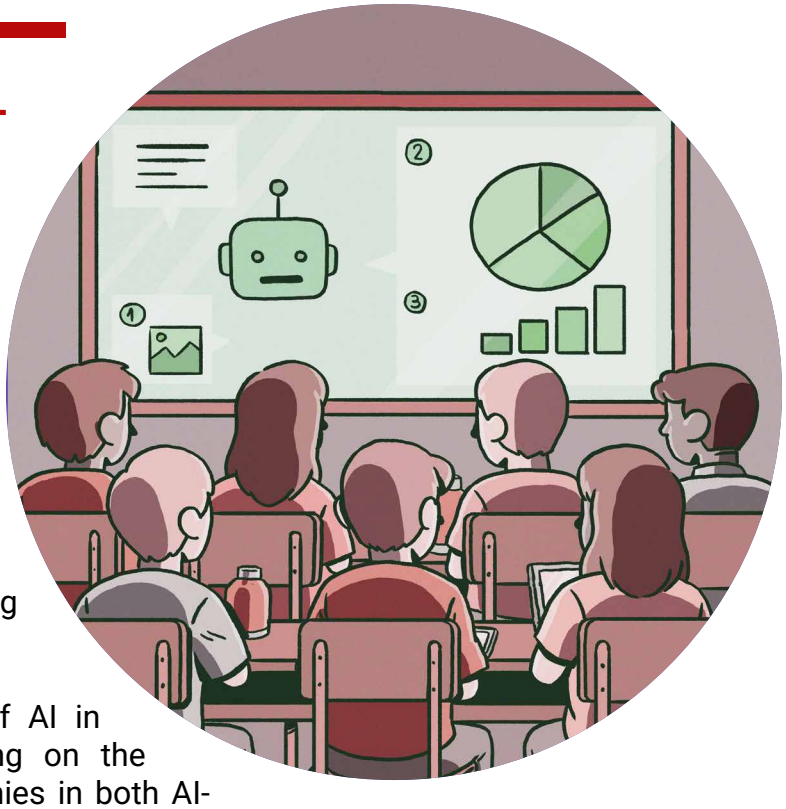
POLICY BRIEF
November 2026

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FOUNDATION FOR EUROPEAN PROGRESSIVE STUDIES

EDUCATION IN TIMES OF AI AND BIG EDTECH

WHY WE NEED A PUBLIC-LED, DEMOCRATIC AND COMMUNITY-CENTRED EDTECH STACK



ABSTRACT

As US Big Tech companies expand their dominance over foundational AI value chains, they are increasingly developing and deploying AI models and technologies for specific sectors, including education. The Education Technology (EdTech) market combines specialised companies such as Duolingo and Coursera with expanding offerings from Big Tech.

This policy brief examines the adoption of AI in primary and secondary education, focusing on the growing role of US Big Tech and AI companies in both AI-enabled education (AIED) and AI literacy. Beyond providing technologies for teaching and learning, companies increasingly seek to shape how AI itself is taught. For example, Google has established agreements with India and the African Union Commission to provide AI literacy training for teachers and students, including training on its own AI products.

While Big Tech's influence is also expanding across higher and adult education, primary and secondary education warrants particular attention because these technologies interact with minors at scale and are often adopted through public policy.

The brief identifies key concerns surrounding Big Tech-driven EdTech adoption and explores how educational technologies could instead be developed and governed through democratic, sovereign and public-interest approaches. Focusing on Europe while considering international alternatives, it concludes by situating EdTech within a broader debate on education as a fundamental right and public good, rather than a market-driven commodity.

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1. Introduction

As US Big Tech companies expand their dominance over foundational artificial intelligence (AI) value chains, they also develop models and related technologies for specific sectors. Education is one of them. Today, education technology (EdTech) is a business that combines native or industry-focused companies like Duolingo and Coursera with Big Tech offerings.

This policy brief addresses the adoption of AI in primary and secondary education. Focusing on these stages of formal education, the brief examines the role of US Big Tech and AI companies in the provision of technologies for teaching and learning with AI (known as AIED), as well as its growing efforts to influence the teaching of and learning about AI, usually defined as AI literacy. As an example, Google has agreements with India and the African Union Commission for the provision of AI literacy training to teachers and students. The company trains them to use Google AI products.[1]

It should be noted that US Big Tech companies are also playing an increasing role in pushing universities to adopt their models, cloud and related technologies. They are equally active in adult learning environments. While it is necessary to analyse their influence on every teaching and learning space, there is greater urgency to provide independent assessments of EdTech and AIED adoption for primary and secondary education, where these technologies interact with minors on a large scale and are often directed by public policies.

As this policy brief highlights, there is a need to discuss in democratic spaces – independent from Big Tech and AI companies – what type of education technology should be adopted, who should develop it and under which terms. This brief contributes to the discussion. After summarising the main EdTech services offered by US Big Tech and leading AI start-ups in Section 2, Section 3 raises nine areas of concern split into general and EdTech-specific issues. This is followed by a reflection on how technology for formal education should and could be developed in democratic and sovereign ways focused on Europe but aiming to think of international alternatives with other countries in Section 4. The brief ends by framing the debate on EdTech within a broader reflection on the need to rethink education as a fundamental right and public good that should not be driven by market logics and principles.

2. EdTech by Big Tech

EdTech refers to a wide diversity of digital services and technologies. It ranges from online learning to gamification[2] apps, with AIED growing in importance. AIED can be classified according to whether it is teacher-focused, institution-focused or student-focused.[3]

On the teacher side, AIED includes models used for plagiarism detection, professional development, curation of learning materials, classroom orchestration and AI-enabled teaching assistants. Institutions use AI for student selection (admissions), course planning, timetabling, e-proctoring and other administrative tasks that are not exclusive to schools. Adaptive tutoring systems are among the early models used by learners. AI-enabled applications for language or mathematics learning are examples of other student-focused AIED. More tailored models have also been designed to support learners with disabilities. These days, generative AI applied to chatbots trained to interact with students and teachers is gaining traction. A survey that gathered 1,130 responses from educators and school administrators from 50 countries found that 81% of the respondents use AI. According to the same survey, 84% of the respondents also observed that learners used AI.[4]

The next sub-sections summarise the EdTech, in particular AIED, offering and claims of selected Big Tech and AI companies. The information was extracted directly from their dedicated websites and is presented in this section without introducing the author's analysis, which is presented in Section 3.

2.1 Google

Among Big Tech, Google probably has the strongest focus on AIED, judging by the extensive material available on dedicated websites as well as supplementary documents accessible through those websites. Google's EdTech products can be accessed through Google Workspace for Education. Tailored Gemini models for education use LearnLM, which the company defines as "models fine-tuned for learning and informed by learning science".[5] Bespoke models include NotebookLM, which creates podcasts based on text. Google Classroom is offered as a single application for managing assignments and student-teacher interactions.[6] The suite is completed with less-specialised services like Drive, Docs, Gmail and Meet. Everything runs on Google Cloud. Google sells its Chromebooks to run this suite and other applications, but the device is not mandatory for accessing its AIED, which is offered at no cost to schools.[7] Offering free tools or access to platforms has always been Google's marketing and lock-in strategy.

Google invests millions in teaching students, educators and administrators how to use its AI models.[8] Free training includes how to detect that AI was used.[9] Google developed a comprehensive AI literacy series for educators. It provides, among others, examples of lessons and prompts that automate every task, from planning to delivering lessons. To get access to the training repository, users must log in with their Google credentials, so that everything they watch can be linked to their other data collected by Google.[10]

2.2 Microsoft

Similarly, Microsoft's dedicated webpage for EdTech promotes its suite of Dynamics 365, Teams, CoPilot and the Azure cloud service, as well as other services from its generic suite. Microsoft states that tools tailormade for AI in education are integrated into these services at no additional cost.[11]

Educators can connect these services with an integrated generative AI model for education called Teach. The company states that "Teach helps streamline class preparation with intuitive, customisable features including lesson plan creation, quiz, rubric development, and adapting materials to different reading levels."[12] In parallel, Microsoft's Study and Learn Agent is its generative AI model for learners. The model offers what the company describes as personalised support.[13]

Microsoft has also developed Social Emotional Learning tools, which are described as guidance for developing "a growth mindset", helping students to "navigate their emotions, and build a foundation for success". Applications include Reflect, which Microsoft claims helps to grow an emotional vocabulary, and Minecraft.[14] When learners use Copilot+ PCs, their schools can also use the platform Microsoft Learning Zone. According to the company, this platform aims to provide "dynamic interactive experiences" to improve student engagement.

Microsoft, just like Google, has dedicated efforts to train educators to use its technology. A recent post from 2026 introduces a targeted platform called Microsoft Elevate for Educators, an online community in which Microsoft and teachers provide examples on how they use Microsoft AI for education.[15] Through this platform, Microsoft projects training 20 million people in AI skilling credentials by 2028. Free training, as I will explain later, is also a common strategy to generate user lock-in. Microsoft Elevate is coupled with an AI skills navigator and multiple offerings for training teachers and school administrators on how to use AI in their workplace.

2.3 Apple

Regarding AI literacy, Apple sponsors initiatives aimed at learning to develop applications and adopt AI through its ecosystem. An example is its partnership with Common Sense Media "to support the development of free resources to equip thousands of teachers and their millions of students with the skills to use AI safely and effectively". They offer educators activities and ways to use AI in the classroom. According to Apple, this is "a values-

based framework for evaluating which AI tools are appropriate and beneficial for classroom use".[16]

Moreover, Apple states that Siri – its embedded AI model – can be used on Macs and other devices for planning lessons, writing newsletters for parents and other teaching-related tasks.

2.4 Amazon

Amazon, Google and Microsoft offer cloud services to EdTech companies, such as Anthology, which uses Microsoft's Azure cloud service.[17] The popular app Duolingo, instead, runs and uses AI as a service on Amazon's cloud service, AWS.[18] Amazon privileges providing infrastructure to EdTech companies offering bespoke services to schools. In addition, AWS offers cloud services directly to schools.

In 2024, Amazon launched the AWS Education Equity Initiative (EEI), an investment of $100 million until 2029 in cloud credits and technical assistance for incentivising education institutions to migrate to AWS and use its AI models.[19] By February 2026, the company had issued $22.7 million in cloud credits with 76% of the recipients integrating AI into education.[20]

Among others, this training teaches the use of AI models for the preparation, delivery and analysis of lessons.[21] In its so-called success stories, Amazon highlights the AlifLaila Kids Digital Library – Pakistan's first digital library for kids that provides a subscription-based online library service for families and schools. The library allows teachers to track students' reading progress online. Amazon claims that, because it runs on AWS, the digital library can scale seamlessly, so that thousands more readers can join.[22]

2.5 Meta

Meta also encourages other companies to use its Llama models as the foundation of EdTech products. Llama is used by Blended OS, an AI-native school operating system for administrative tasks. Blended OS claims to deliver tailored education experiences for both in-person and online schools. It offers tools and personalised recommendations for planning lessons, automated grading and analysing student performance. Blended OS also uses Llama for its AI co-teacher Lumi, which gives personalised assistance for STEM and language learning. According to Meta's website, students show 22% improvement in learning outcomes when they use it (see Section 3.1.3 for why such company claims are unfounded and misleading).[23] Blended OS also uses the Microsoft Azure Content Safety tool, which is an AI service that detects misuses or illegal uses of AI as well as harmful AI-generated outputs.[24]

Moreover, Meta's virtual reality and mixed-reality headsets can be used with specific EdTech apps and features. So far, the device has been adopted by universities in the USA and UK.[25]

2.6 Anthropic

Similarly, Anthropic's model Claude powers Teach For All, which develops AIED and training for educators in 63 countries. This network includes 1.5 million students, who can use a version of Claude fine-tuned for education. Teachers using the solution provide feedback to Anthropic that is used for training the models.[26] Anthropic is part of the White House Taskforce on AI Education for AI literacy. In comparison, OpenAI's efforts in the sector are concentrated in higher education (HE), thus falling outside the scope of this policy brief.[27]

Overall, and regardless of which of these firms assigns a higher priority to EdTech, Big Tech and AI companies' involvement in this sector and the type of AIED that they promote raise serious concerns, as discussed in the next section.

3. Reasons to be concerned

The previous section provided an overview of the breadth of EdTech, in particular AIED and AI literacy, developed by leading US tech companies and the claims they make about them. This section delves into the underlying and probably less-visible problems and risks associated with their design and use.

3.1 General AI-related concerns

Certain issues are not exclusive to AIED. In this regard, EdTech can be seen as illustrative of a broader scenario; one that is extremely relevant given the role of education in society.

3.1.1 Data extractivism

The exploitation of learners' – and broadly, school – data is a critical matter of concern related to privacy, surveillance and diverse forms of data monetisation.[28] The problem extends throughout the whole sector. Human Rights Watch reviewed 163 EdTech products and found that 89% extracted data from minors. Most of them also installed trackers that followed children outside of the EdTech application across the internet and over time.[29]

In particular, Big Tech and AI companies can use EdTech data for further training of their AIED and other AI models and can monetise datasets in diverse ways. For example, Google was accused of collecting as much data as possible through Google Classroom and connected tools, well beyond the data needed for the functioning of the platform.[30] In this case, users were obliged to connect with their Google accounts to access Google AI training and tools, thus enabling the company to link and further monetise education data with data from other Google platforms and services. Fiormonte reported that it has become widespread for companies to use retrieved data to develop and sell not only new EdTech services to schools and universities but also online diplomas that compete with the public education system.[31]

Moreover, EdTech often uses techniques to maximise the time spent in front of a screen, such as gamification. Microsoft Learning Zone explicitly seeks to expand engagement online. These strategies replicate the addictive algorithms used in social media and raise concerns in terms of the direct abuse of minors' screentime for EdTech. Reasons to worry extend to how training in such platforms may make learners more inclined to fall for the same techniques used by social media.

EdTech additionally promotes data gathering, tracking and profiling of students by schools. A Microsoft-sponsored International Data Corporation (IDC) report incentivises the continuous collection of data and the use of "compelling quantitative and qualitative data metrics".[32] Along similar lines, the head of Google for Education claimed that adaptive learning technology provided data that teachers could analyse. Even if data can contribute to making more informed decisions, concerning questions are raised. For example, were families asked before the school and tech companies started collecting and processing such data from learners? Who decided that such a degree of surveillance of minors,

"EdTech often uses techniques to maximise the time spent in front of a screen, such as gamification."

teachers, other education-related staff and parents should be tolerated? School surveillance will affect their personalities and shape behaviours in a repressive way.

3.1.2 Manipulation, misinformation and accountability

A risk associated with data extractivism refers to the possibility of being manipulated by AI models. In the words of Stefania Giannini, former Assistant Director-General for Education at UNESCO, "we know that one of the primary and most readily apparent risks of AI is its potential to manipulate human users. We further know that children and youth are highly susceptible to manipulation and much more susceptible than adults".[33]

Yet, even if the model does not exercise such manipulation, its use entails misinformation, which in popular jargon is labelled hallucination. Misinformation is particularly problematic at primary and secondary school levels. Learners will most likely lack the skills and background knowledge to distinguish a useful answer from one that is partly made up. In any case, because of the black-box nature of generative AI, it remains difficult to verify sources and understand what parameters and scope of search are used to provide an answer. And even a good answer may not be as good as one that could result from reading original sources and discussions among peers and with educators – both as a learning exercise and regarding the actual answer.

Because of their black-box nature, the use of these models also reduces transparency and accountability. Independent research has already pointed to the limited transparency of using AI and other algorithms for or to support decision-making in the public sector.[34] Proprietary software and models offer very little, if any, chance of conducting external audits.[35] In areas as sensitive as teaching, limited accountability and transparency are especially concerning.

3.1.3 Unfounded and misleading evidence

Speaking of transparency and accountability, evidence of the effectiveness of AIED should equally be questioned. A common and expanded marketing strategy used by US Big Tech for AI applications is to borrow credibility from users. From medical doctors to academics, the practice extends to EdTech. In this case, they borrow credibility from teachers and school administrators. Company websites publish their testimonies, allegedly confirming all the claimed virtues of adopting AIED and related technologies. Of course, these testimonies particularly praise the services of the company that publishes them.

Some Big Tech companies go even further. Microsoft sponsored an IDC report (as mentioned in Section 3.1.1) on the benefits of introducing AI for primary and secondary education.[36] Meanwhile, Google has its own publications claiming to survey large populations who agree on AI-adoption advantages. Google uses its own surveys – and has even conducted a randomised control trial – to prove the success of its own services. As if the mere act of using a mainstream method would turn its evidence into neutral, uncontested facts, Google insists and presents results of its studies as proof of AI uptake in education and its benefits.

Likewise, based on a survey of 16 educators who used Meta for Education, Meta states that "Educators in the beta program found that virtual and mixed reality made educational content more memorable for students and helped educators to explain and demonstrate complex concepts". No information is provided about the interviewees. There is only a footnote that says "Based on a qualitative survey of 16 educators across beta program participating institutions, all of whom agreed with this sentiment". There is no further information on how the 16 educators were chosen or whether they all agreed with the statement above. The total size of the sample is as problematic as the lack of information on who and where those interviews were conducted. For instance, people may feel more inclined to say positive things if asked directly by the provider of the technology or if offered the technology for free in exchange.

Nevertheless, all these claims are gathered by the company offering the very technology whose benefits are supposed to be examined. One of the few independent studies, which was focused on HE, found that most participants had not yet observed "significant value in new technologies or to experience significant disruption in the everyday practices of HE".[37] This study remains an exception, since there is very little independent evidence "for the efficacy or safety of AI in education, or for any of the claimed benefits".[38] As a *Guardian* piece synthesised, "the evidence base for ed tech is narrow, industry-driven and shaky at best". [39] The same piece complained that learners were sat in front of a screen to click through apps, which seemed much less revolutionary than the companies claimed. And, as they continue using them and clicking, they become more dependent on black-box technologies.

3.1.4 Lifelong lock-ins

A further area of concern that is not exclusive to schools or education is technology lock-in. The overwhelming dominance of US Big Tech companies goes beyond their direct EdTech offerings. As explained before, cloud giants sell the possibility of using infrastructure and platforms on top of which other solutions are developed as a service. The resulting direct and indirect dependence poses at least three risks.

First, it is unclear whether AIED will generate companies' promised savings as the fees for using these tools are charged based on a pay-as-you-go system, through which the more one uses the technology, the more one pays. It is unclear how public institutions will regulate their use of AI models as a service if minors are directly interacting with the technology and may not be aware of all the dangers or risks associated with their use.

A second form of lock-in goes more unnoticed because its effects filter through people's lives. When minors learn with, let's say, Google's Gemini, they are also creating a sunk cost for themselves, as they are learning to interact with one specific set of tools, making them more prone to continue using Google's AI technology throughout their lives. The same applies to their guardians, teachers, school directors, secretary and other school staff, especially if they keep records of activities that they carry out annually with learners. More importantly, if they lose the capacity to design lessons independently, their chances of stopping the use of AI will further diminish.

Third, as educators may lose the capacity to work independently, there is an underlying risk of losing their digital memory if the company providing the technology discontinues a service. This happened with Google's CS (computer science) First initiative. Google deleted the service and the data that teachers and students had stored within it.[40]

For these reasons, the lock-in goes beyond a specific company. Even if users could freely move between AIED and other EdTech services, the cognitive lock-in would remain, as they would be confined to using AI models. From this vantage point, offering EdTech "for free" – like Google and Microsoft often do, as mentioned in Section 2 – represents both an expansion of data extraction and an investment in expanding a locked-in community of individuals and organisations. Workers, in this case teachers, school administrators and other staff, integrate this locked-in community. And the more they use AIED, the less they will be capable of working without it.

3.2 EdTech-specific concerns

3.2.1 Taylorism at schools

AI, and generative AI in particular, is ushering in a new cycle of deskilling, which is understood as the loss of capabilities or skills in the workplace. The process is similar to Taylorism,[41] as described by Braverman.[42] While this transformation is not specific to EdTech, its effects are particularly dire in this sector.

The Microsoft-sponsored IDC report asserts that AIED expands pedagogical thinking.[43] When this claim is explained, pedagogy is basically understood as outsourcing the cognitive tasks performed by teachers, such as curriculum planning, developing

When technology is used to simplify content for learners, decisions are made in terms of what they will learn and the extent to which they will learn to think or to critically respond to different contexts.

unit plans and lesson sequences, to the AI models. In connection to Taylorism, a risk is leaving educators – just like any other worker – with a reduced understanding of how their work is organised, as the AI model will be making those decisions.

Assuming that technology can replace such tasks fails to consider that the organisation and delivery of teaching entail ethical and political choices. As a critical piece on Google's AIED offering phrased it, replacing teachers in such critical tasks "evades discussions about whether global technology companies should possess power and authority to reshape the work of teachers and the experiences of students, at unprecedented scale. It turns political problems about schooling into seemingly simple technological solutions that tech companies are best placed to administer".[44]

As the piece continues arguing, techno-solutionism sidelines debates "about the social or collective purposes of education".[45]

When technology is used to simplify content for learners, decisions are made in terms of what they will learn and the extent to which they will learn to think or to critically respond to different contexts. Using NotebookLM to create a podcast based on text could be useful in certain specific contexts, but the risk is in simply replacing a reading comprehension exercise with a simpler listening comprehension. Yet, the fundamental question is who decided that reading comprehension was no longer needed or that schools should adopt NotebookLM? Or that reading can ultimately be relegated to learning through gaming and pre-digested text?

There is a risk of the disappearance of the space for discussing what pedagogical approach to introduce at each step of the learning process. Companies push schools to assume that an AI-mediated efficient acquisition of knowledge is the right approach. In this context, corporations become the "authoritative cultural gatekeeper of knowledge".[46] Tech companies decide what and how students should learn and how educators should teach. These decisions are embedded in the design of their technologies, in the data used to train AI models and in the models' parameters.

This concern was also outlined by the former Assistant Director-General for Education at UNESCO at the aforementioned speech on generative AI and the future of education. She made a call to watch and prevent generative AI models from undermining the authority of teachers. "We would be naïve to think that future AI utilities will not strengthen calls for further automation of education: teacher-less schools, school-less education, and other dystopic visions", she added.[47]

Against this backdrop, teachers feel disempowered, as their role shifts from planning, designing and analysis to becoming technology operators and delivering content.[48] This feeling of disempowerment is characteristic of the introduction of Taylorist practices because they strip workers of their workplace knowledge. Teachers execute what the technology decides. Indeed, a survey conducted by the UK's national education union found that the use of standardised curricula, due to – among others – the introduction of EdTech, results in teachers reporting a lower sense of autonomy at work while offering no

> *Big Tech and other companies have adequately learned the language of school managers – even those in public schools often prioritise the search for efficiencies in the context of budget shortfalls.*

significant workload relief. Regarding the latter, 81% of the primary school teacher respondents strongly disagreed with the statement "Overall, I achieve a good balance between my work and my private life", and 84% either strongly disagreed or somewhat disagreed with the statement "I can complete my assigned workload during my contracted hours". These figures were 75% and 80%, respectively, for secondary school teachers.[49]

3.2.2 Time, efficiency and techno-solutionism

A common hook to expand the AIED user base is to focus on saving time. Big Tech and other companies have adequately learned the language of school managers – even those in public schools often prioritise the search for efficiencies in the context of budget shortfalls.

Google's Brochure "Gemini 3.1: Grounded in learning science" claims that 82% of educators perceive that they need a more balanced workload and adds that the company's AI models address "actual educator needs".[50] Google then promotes its AIED as a customisable solution for teachers' "specific pain points". This brochure continues by saying that "Gemini with LearnLM can help source instructional materials, compose compelling questions, or quickly draft communications with parents".

Likewise, the Microsoft-sponsored IDC report explicitly recommends that school administrators "focus on areas in which AI can drive the greatest value and impact, such as addressing faculty and staff burnout and attrition, learning loss and chronic absenteeism, or resource-intensive administrative or operational challenges".[51] It is particularly concerning that Microsoft recommends administrators treat teachers' mental health issues with AI.

Going a step further, Marone and Heinsfeld question the idea of a stagnant education system used by companies when they try to foster schools' adoption of their technology.[52] They observe that this promotes a vision of teachers and students as "incomplete and lost beings on the path towards an alarmingly indeterminate future, which can be only overcome by the technologies and services offered by these corporations". This narrative further stresses that it is up to individuals to adapt to technology – assumed to be a deterministic transformation and neglecting the social, political and economic motivations underlying technological change.

In any case, should efficiency be the main driver of education? What is lost in terms of student learning when the main variable to consider is efficiency when deciding if a school adopts technology? For Holmes, there is a risk of expansion of a technocratic view of education coupled with a potential loss of human interaction, which is essential for learning to live in society.[53] Techno-solutionist narratives, which claim that EdTech and specifically AIED promote efficiency, even when this was not observed as a problem by the education community, also distract from the critical reflection needed on the role of technology in education.[54]

Speaking of efficiency, AIED-claimed efficiencies should also be questioned. Marone and Heinsfeld

> *In 2025, a scientific study was published, which concluded that humans think less when using generative AI, even less than when using traditional search engines.*

argue that teachers may now need more time to adopt technologies, including time for training and professional development and the time it takes to update and troubleshoot software and hardware.[55] Extra time is likewise invested in checking if students are cheating with AI by thinking of how to design assignments that cannot be solved by AI but still assess students' development of expected skills.[56] It is equally time consuming to ensure that students' access to and use of technology are safe.

A related narrative promoted both by US Big Tech and AI companies themselves, and by reports authored by other organisations commissioned and/or sponsored by them,[57] is generative AI's "inevitability". They mobilise this idea to push for schools' mass adoption. Do they refer to passing exams? Do students understand more, better and by themselves? Such a rhetoric entails stating that their models improve learning outcomes but provide little if any specification of learning outcomes, how they were defined and by whom.

3.2.3 Cognitive offload

Speaking of both teachers' abilities and students' learning and experience, a major risk associated with the introduction of generative AI models for educational purposes concerns the undermining of cognitive capabilities, including, as Holmes points out, stifling their creativity.[58] In 2025, a scientific study was published, which concluded that humans think less when using generative AI, even less than when using traditional search engines.[59] Using electroencephalography, researchers measured the brain activity of three groups, who were asked to write an essay. Refraining from using any technology consistently produced better results, both in terms of cognitive activity and the ability to remember what had been written.

Going a step further, Microsoft itself reported similar findings regarding the impact of generative AI on critical thinking in a publication based on a survey of 319 workers engaged in creative tasks.[60] The study found that the greater the trust in generative AI, the lower the level of critical thinking. Yet, simultaneously, Microsoft pushes for more adoption of generative AI at school. The company goes as far as to give explicit pedagogical advice to teachers:

> "One-on-one attention has an enormous impact on students' engagement, learning, and well-being. Make check-ins part of your routine to give each of your students a place to share their feelings and give yourself data to track their status, progress, and needs".[61]

Microsoft offers an application for registering these check-ins called "Reflect check-ins".[62]

Judging by these and other tasks automated by AIED (see Section 2), educators' critical thinking risks being reduced to prompting, verifying and integrating AI's responses. The Microsoft-sponsored IDC report mentioned previously assumes that, by using AI, teachers' role should change from content deliverer to facilitator and relationship builder.[63] The reductionist way in which the report refers to educators, whose role is much more than a content deliverer, is already a matter of concern. Paradoxically, replacing all the planning and thinking

> *Replacing all the planning and thinking with AI will effectively turn teachers into content deliverers.*

with AI will effectively turn teachers into content deliverers. Associating planning with administrative paperwork as a means to promote AI adoption, this impartial report pushes for turning teachers into a mix of in-classroom animators and therapists.

The problem is particularly acute for students, as the risk is that they may never learn to think for themselves and instead become structurally dependent on AI models. And this is precisely what the IDC report suggests: "Position AI skills development not only as academic support but as essential preparation for students' futures".[64] Unsurprisingly, the report makes teachers and school administrators responsible for "educating parents" (also known as convincing them) about how indispensable and good AI at school is.

Yet, despite these claims, results keep pointing in the opposite direction. In Colombia, where students use AI bots embedded in Meta's apps, educators have already reported an increase in AI-generated assignments and a decline in students' performance.[65] Learners are not misusing AI models. They are using them precisely as they were designed. Selling points on Google's EdTech website include that its models can adjust text complexity to reduce the cognitive load, claiming without foundation that big ideas will not be lost in this process.[66]

As teachers become AI appendices and students learn and are even assessed through interacting with AI models, learners may no longer see teachers as the authoritative voice. They may simply believe that the AI model is the maximum authority or is always right. Human intelligence would get devaluated, which, given that AI models are simply advanced statistics, could lead to lower quality or even incorrect answers being accepted. As explained above, AI often invents things, while neglecting critical social and emotional aspects of learning.

3.2.4 Privatisation and commodification

Another effect of the mass adoption of AIED is the promotion of a private or commoditised teaching space. The Microsoft-sponsored IDC report even treats educators, administrators and students as entrepreneurs, pushing them "to innovate and fail fast".[67] The push to adopt a business mindset in schools may be at the expense of prioritising public values and the common good.

Schools, both public and private, generally adopt proprietary technology that promotes customised teaching. This transforms students into consumers whose needs will be fulfilled by technology.[68] The risk is in undermining the principle of education as a public good. A related example is Amazon's promotion of private libraries through the case of Pakistan's digital library (see Section 2.4). Families and schools must now pay for what should remain a public good. Furthermore, one wonders why a digital library should be on a tech company's cloud, with a locked-in subscription to AWS.

3.2.5 Amplification of inequalities

Finally, AIED adoption can amplify inequalities. Schools in poorer areas may use AI to replace teachers while only wealthy schools may continue offering human teaching and caring, fostering

> *The push to adopt a business mindset in schools may be at the expense of prioritising public values and the common good.*

intellectual exchange and direct relations with peers and educators. Schools with more resources may also be able to develop more critical understandings of the technology or pay for models that provide more detailed explanations and accountable sources.

Additional inequalities may emerge from the use of generative AI models for personalised learning. While paying attention to students' special needs is certainly relevant, this should not be translated into a form of surveillance school in which each kid interacts with its customised apps, limiting interaction among peers and forms of social interaction with educators.

Schools are central for cultivating essential human competences that are critical for learners' development as citizens, as politically engaged actors, in their personal relationships and in their lives within communities. Knowing how to work in groups and learning to adjust to others are skills that could be put at risk. For Holmes, the extreme emphasis on individual learning paths can "downplay the crucial role of education in community-building and social skills development, ignore the holistic development of students, and potentially perpetuate socio-economic and cultural disparities".[69]

Holmes analysed dozens of AIED types.[70] He found that many of these models were questionable from an ethical, pedagogical or educational perspective. A concrete example is the use of AI models for grading since algorithmic biases may operate against learners with certain demographics or belonging to certain ethic groups. For instance, Williamson et al. argue that AI models may artificially award higher marks.[71] Since AI models make inferences to identify a good essay based on past good essays, and these are usually well-written and well-structured, the AI model may assign higher grades to essays that follow these patterns.

4. Recommendations

Altogether, there are many reasons to be concerned about the current evolution of EdTech, and especially AIED, in primary and secondary schools. The EU and its member states should offer alternatives and further regulate and enforce existing rules against the sector before it is too late and schools are locked into long-term, predatory contracts.

These alternatives can build on traditions within the education space, connecting independent tech experts and scholars with teachers, their unions, independent civil society organisations and libraries, working together to rethink an EdTech ecosystem that puts teaching and learning at the forefront. Such an ecosystem should empower learners to think critically and be actively engaged in their own learning processes. Likewise, this ecosystem should not be aimed at automating educators' planning and decisions on how and what to teach. On the contrary, teachers should actively decide which technologies they adopt and understand how these work.

From a governance perspective, such an alternative ecosystem could build on examples like the ENNEPlus project. Through challenge-based learning, involving 28 vocational education and training centres and local stakeholders, digital tools were used to strengthen problem solving,

collaboration and critical thinking while maintaining the central role of educators in pedagogical design. These experiences could be taken to the next level, as teachers and learners get involved in not only choosing which technologies to adopt and how to do so but also in designing and co-creating technologies with scientists and engineers.

Yet, these democratic spaces will not succeed, unless their infrastructural layers are guaranteed by the public sector. Otherwise, the risk is in developing EdTech that will land on a Big Tech's cloud system. The success of these alternatives will also depend on complementing them with more funding for overcoming existing deficits in public education systems, among others, in terms of the number of teachers and adequate facilities.

In what follows, policy recommendations are provided. They shouldn't be seen as a list of discrete proposals but as a road map. Their success depends on their joint implementation, building on their complementarities. Proposed policies set a two-tiered strategy that combines regulation with the development of a democratic, bottom-up, public-led and community-centred EdTech ecosystem. By community-centred, this policy brief refers to an ecosystem that is designed together with the education community.

4.1 Building a democratic, public-led and community-centred EdTech ecosystem

Given that education is a supporting competence, and thus, the EU's regulatory role is limited, the EU could design an alternative ecosystem to be shared with and further improved by member states. Mediated by open discussions with their specific education communities, member states could then implement such an alternative if and as they see fit. For that purpose, this brief makes the suggestions outlined below.

4.1.1 Mapping, designing and fostering alternatives

Form a Joint Research Centre (JRC) interdisciplinary and independent taskforce to design an alternative ecosystem. It should start by assessing existing open-source technologies and mapping the available public infrastructure.

On this basis, and in consultation with teachers, learners and their families, experts, and the public sector, the taskforce should design and develop a democratic, public-led, ecological and community-centred digital stack for schools, ranging from infrastructure to apps. The development of the technology must remain open for public sector auditing and always enable users' participation in its design and oversight. The design of such an alternative could thus build on the recommendations made in the report "A progressive roadmap for expanding European digital sovereignty".[72]

This alternative EdTech ecosystem should only be built and promoted for relevant use cases with a purpose that justifies the use of digital technologies over other alternatives. In this respect, the taskforce should also recommend when EdTech is not desirable or needed.

A list with existing open-source services should be made available as a sub-product of the assessment. It could be included in the catalogue of software tools proposed by the European Commission's Tech Sovereignty Package aimed at offering a one-stop-shop for open-source resources in the Union. Promoting open-source materials would also be in line with this proposed package.

4.1.2 Replace Big Tech and AI companies as being responsible for EdTech and AI literacy

Independent and more comprehensive tech and AI literacy is urgent and should go beyond suggesting frameworks and providing recommendations. Special lines of funding could be opened for those schools aiming to implement and co-develop their own best practices with academics, libraries and independent civil society organisations for teaching

critical digital skills and AI literacy, considering its economic, ecological, social, ethical and political effects. These consortia shall not include Big Tech or AI companies or organisations funded by them.

Regarding existing recommendations, the EU's DigCompEdu framework and the European Commission's AI literacy framework should be equipped with a more comprehensive assessment of digital ecosystems and their multidimensional impacts, including the concerns outlined in this brief. They should also acknowledge and explain the economic, political, ethical, ecological and social impacts of AI and related technologies. While the AI literacy framework does acknowledge some of these effects, more details on environmental, societal and ethical effects are needed. Moreover, the framework does not reflect on the (geo)political and economic dimensions of how AI ecosystems are structured. Further explanation of the politics and economics of AI research agendas and how this affects the type of models developed should also be given.

The cognitive risks of using AI for brainstorming or iterating on original ideas should also be included in this framework. A focus on keeping spaces of learning free from the use of AI and other digital tools should also be promoted.

4.1.3 Protect and empower users

Foster democratic, bottom-up, public debates and shared decision-making regarding whether and what EdTech should be developed, how it should be developed, by whom, and who should adopt it and supervise its deployment. The EU could promote and fund open spaces for consultation and decision-making with parents, teachers (including but not limited to their union representatives) and experts. Learners should also be consulted.

With the necessary AI – and broader tech – literacy proposed above and the assessments and regulations suggested below, education communities will be better prepared to engage with technology critically, building resilience, self-regulation and informed digital behaviours. Still, public regulation and its enforcement will remain necessary and are urgent.

4.2 Regulating EdTech

4.2.1 An independent EdTech watchdog

The EU and its member states should create a new institution (or eventually expand the prerogatives of an existing one) aimed at independently defining conditions to be followed by EdTech tools, especially AIED, for getting approval for use in schools. This regulator should approve technologies and conduct regular audits of approved technologies, provide public reporting and function as the place where complaints against specific technologies can be raised. As emphasised by the former UNESCO Assistant Director General for Education, "industry self-regulation would introduce an unacceptable conflict of interest"[73]. And this observation comprises the assessment of their tech offerings.

Following UNESCO, the assessment of every new educational resource should consider: "(1) accuracy of content, (2) age appropriateness, (3) relevance of pedagogical methods, and (4) cultural and social suitability which encompasses checks to protect against bias. In many places, resources are further inspected by groups of teachers and school leaders as well as various civil society groups, prior to receiving institutional approval".[74]

AI models and other EdTech applications should be examined by considering these and additional criteria.

4.2.2 Pause EdTech and forbid the use of generative AI in the classroom

Along the lines proposed by Williamson et al.,[75] member states and the EU should encourage a pause in the adoption of EdTech, in particular AIED, in schools in the EU until the above-mentioned independent watchdog is created and assesses existing services.

Additionally, based on existing evidence pointing to harms and cognitive damages, member states should forbid the use of generative AI models in the classroom. Regulations regarding the prohibition of social media for minors have arrived too late and should serve as a cautionary tale. Countries are exploring alternatives, including banning the use of smartphones at school, which has proven to have positive results in Brazil.[76] Other solutions could require learners in primary and secondary education to use software that blocks every app and website from their smartphones, except for the teaching tools designed and decided upon democratically by the members of the education community.

4.2.3 Forbid data harvesting and exploitation from EdTech and its infrastructure

The reasons for preventing data harvesting and data exploitation from EdTech and other tech used for learning and related purposes are multiple. First, profiling learners generates proven anxieties and other mental health disorders. Second, data can be monetised in multiple ways once it is harvested and concentrated, resulting in inequalities based on an extractive practice. The Netherlands provided an example to expand and learn from. Under pressure for GDPR enforcement, Google was required to only process data from schools and universities under three specific cases connected to the basic functioning of their tools, including installing updates and solving bugs.[77] This measure could be complemented with the request to publicly share harvested data.

4.2.4 Protect workers' rights

Protect teachers and school administrators and other staff from forms of algorithmic management, as well as from the push to replace teaching quality and educators' workplace knowledge with fast and blind adoption of AI and related tools. Such adoption, as mentioned above, disempowers and deskills education professionals and does not contribute to learners' development.

5. Education beyond EdTech

The EU has a chance to proactively enforce and regulate the use of generative AI and other technologies at school while developing its own ecosystem of education technologies in a democratic, accountable way that puts teaching and learning ahead of techno-solutionism. In this respect, the push from Big EdTech to adopt AIED and related technologies should be seen as a wakeup call beyond tech-specific discussions.

In education, quality shall not be defined by efficiency or the speed of adoption of whatever technology is promoted and defined by corporate giants. Teaching and learning should be aimed at building community and sharing. The school should be a place where learners are confronted with the best of human history, not with average results provided by advanced statistical models. And, along the lines of Citron,[78] education should not be seen as a business and should not promote individualising, profiling or surveillance.

> *"Better schools need, above all, sufficient public budgets, not more gadgets."*

As Big Tech and AI companies' AIED is adopted, schools' dependence on these companies goes beyond infrastructure and models. By using their generative AI to automate teachers and students' thinking, there is a risk of the skills required to solve complex tasks, like those that our society faces today, not being developed. Instead, frontier creative skills will remain monopolised by the few, while the many receives pre-digested, simpler tasks designed within pedagogical frameworks defined by and for corporations. Resulting dependence on these companies' algorithms may reach as-yet-unforeseen levels, as new generations may not learn to think by themselves, without using AI models. This is probably the major risk posed by schools' adoption of their technologies.

Thinking of educators, digital technologies should support them rather than replace their most intellectually stimulating tasks. For that purpose, they should be designed with them and remain open to them. Technologies should be, above all, a common good produced and reproduced on the basis of mutual collaboration among experts in digital technologies (including experts in their multiple social, ethical, political, economic and ecological effects) and education communities.

To conclude, it should be emphasised that the introduction of technology should never be seen as an antidote to budget shortfalls. Education must be better funded and should enhance direct interaction and exchange within the community. Better schools need, above all, sufficient public budgets, not more gadgets.

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