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OBESSU Policy Paper on Artificial Intelligence in Education

Safeguarding and Empowering Learners through a Rights-based Approach

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Introduction

The Organising Bureau of European School Student Unions (OBESSU) is the platform for cooperation between national school student unions active in general secondary and secondary vocational education (VET) across Europe. Since 1975, OBESSU has advocated for participatory, inclusive, and quality education for all learners. Amidst the **rapid and often unregulated deployment of Artificial Intelligence (AI) systems across society**, we are concerned about the implications towards learners and educational systems across the region and beyond.

The speed and scale of AI adoption, especially generative AI,[1] pose amplified challenges that outpace existing policy frameworks.[2] The ***European Union's Artificial Intelligence Act***, adopted in 2024, represents the first comprehensive legal framework for AI regulation, but its enforcement remains incomplete.

Meanwhile, AI is already transforming education, **shaping how students learn, interact, and are assessed, often without sufficient safeguards**.[3] Additionally, national AI strategies often overlook learners' unique needs, and independent research on the very effectiveness and impact of AI as an educational tool remains limited.[4]

There is an **urgent need to address the impacts of AI in education now**,[5] because, as stated by the Council of Europe:

> *"...**Education is a special case because of its role in actively shaping and supporting human development** .... the aims of education are to enable a child to develop their full potential (UNCRC, Article 29), and for the development of informed, responsible citizens who actively participate in*

[1] *C. Kroet. ChatGPT could face strictest set of EU rules as it hits 120 million users in Europe. Euronews. 2025.*

[2] *References:*

- *UNESCO. Recommendation on the Ethics of Artificial Intelligence. 2023*
- *OECD. Recommendation of the Council on Artificial Intelligence. 2024*
- *Council of Europe. Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law. 2024*

[3] *A. M. Vieriu and G. Petrea. The Impact of Artificial Intelligence (AI) on Students' Academic Development. 2025*

[4] *Council of Europe. PREPARATORY STUDY FOR THE DEVELOPMENT OF A LEGAL INSTRUMENT ON REGULATING THE USE OF ARTIFICIAL INTELLIGENCE SYSTEMS IN EDUCATION, 2024*

[5] *Approaches (Europe) about digital transition focusing on education:*

- *Council of Europe: 2025 European Year for Digital Citizenship Education. 26th session of the Council of Europe Standing Conference of Ministers of Education, September 29, 2023*
- *European Commission, Union of Skills, Action Plan on Basic Skills, 2025*
- *AI literacy frameworks:*
  - *Council of Europe. Discussion Paper on Draft Recommendation on AI Literacy, 2025*
  - *European Commission and the OECD. Empowering Learners for the Age of AI An AI Literacy Framework for Primary and Secondary Education, 2025*

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democratic processes and address societal challenges. ***The application of AI can interfere with these aims…"***

Building upon our previous work on digitalisation, student welfare, and inclusion, OBESSU advocates for a **rights-based approach to the development, deployment, and governance of AI in education**. Technology must serve learners' holistic development, safeguard their rights, and empower them as active, critical agents in their education and society.

AI in Society: Opportunities and Amplified Risks

AI technologies are transforming society, **offering new opportunities** for efficiency, personalisation, and innovation. AI can automate repetitive tasks, enhance decision-making, and tailor learning experiences to individual needs. It also has the **potential to contribute to global challenges** such as climate change and accessibility for people with disabilities.

However, these opportunities are accompanied by **amplified risks**, particularly for young learners. AI systems rely on vast amounts of data, raising concerns about excessive collection, surveillance, and misuse. In mandatory educational settings, where consent is problematic**, minors' sensitive data requires the highest level of protection.**

AI also inherits and amplifies **societal biases**. Discriminatory outcomes in education, such as biased grading or unfair allocation of resources, risk deepening inequalities.[6] Worth acknowledging is the **environmental impact** of large-scale AI models, which consume vast amounts of energy and water, contributing to carbon emissions and electronic waste.[7]

AI also **shapes information ecosystems**. While it can improve access to knowledge, it also enables the creation of deepfakes and disinformation, eroding trust and exposing young people to manipulation.[8] Algorithms can act as filter bubbles, limiting exposure to diverse perspectives and potentially fostering social polarisation. As advocates of learners' well-being, we can't ignore how AI-powered algorithmic feeds affect their mental health, increasing risks of addiction, anxiety, and depression.[9]

AI in Education: Safeguarding Rights in a Unique Context

Education is uniquely vulnerable to the risks of AI. Over the past decade, many AI systems have been introduced into schools **as "black boxes"**, with little transparency about their decision-making processes.[10]

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[6] *Walsch, B. How an AI grading system ignited a national controversy in the U.K. 2020*
[7] *Kaur, D. ChatGPT's monthly carbon footprint equivalent to 260 transatlantic flights. 2025*
Frost, R. ChatGPT 'drinks' a bottle of fresh water for every 20 to 50 questions we ask, study warns. 2023
[8] *Vaccari C. and Chadwick, A. Deepfakes and Disinformation: Exploring the Impact of Synthetic Political Video on Deception, Uncertainty, and Trust in News. 2020*
[9] *Ettman, K. C., and Galea, S. The Potential Influence of AI on Population Mental Health. 2023*
[10] *Council of Europe. ARTIFICIAL INTELLIGENCE AND EDUCATION - Regulating the use of AI systems in education. 2024*

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Before deploying AI, **fundamental prerequisites** must be met. Equitable access to reliable internet, affordable devices, and inclusive digital tools is essential to ensure the integration of AI in education does not gatekeep educational rights of students from rural areas and with little financial resources. Governments must provide financial support for disadvantaged students, invest in Open Educational Resources (OERs), and ensure linguistic diversity.

The EU AI Act classifies certain **educational AI systems**, such as those influencing admissions, evaluations, or monitoring, **as** "**high-risk**". It also prohibits biometric identification, emotion recognition, and social scoring. However, the lack of education-specific safeguards often leaves schools largely unsupported in addressing AI's overall impact.

AI risks **undermining learning itself**. Easy access to AI-generated answers can reduce students' cognitive engagement and hinder the development of critical thinking and learning capacities[11] – particularly in primary and secondary education, where these skills are formed.

Transparency is another major concern. Many AI tools are deployed without independent validation of their pedagogical effectiveness or fairness, effectively treating students as test subjects.[12] The growing influence of private companies in the digitalisation of education risks undermining core educational functions and democratic oversight.

OBESSU insists that AI must be integrated into education only when it empowers students and teachers to **achieve educational goals**, fosters learning processes and abilities without replacing them, and safeguards students' and educational rights. Similarly, AI literacy must be embedded in curricula to equip learners with the **competences to critically engage with technology**. Finally, students must retain the **right to disconnect**, ensuring that digital fatigue does not erode their well-being.

Setting the Path Forward – OBESSU Demands on the Integration of AI in Education

The integration of AI into education holds both promise and peril. Without a deliberate, rights-based, and learner-centred approach, we risk exacerbating inequalities, undermining pedagogical integrity, compromising privacy, and ceding control of education to opaque commercial interests.

OBESSU demands for a possess that ensures integration of AI in education adheres strictly to a human rights and child rights-based framework, prioritising learner well-being, equity, pedagogical

[11] *N. Kosmyna, et al. Your Brain on ChatGPT: Accumulation of Cognitive Debt when Using an AI Assistant for Essay Writing Task. 2025*
[12] *Council of Europe.REGULATING THE USE OF AI SYSTEMS IN EDUCATION PROVISIONAL REPORT. 2024*

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value, and meaningful student participation above purely technological or commercial considerations.

Demands to EU Institutions & Member States: ***Stronger Regulation, Stronger Oversight, Mandate Transparency & Accountability, while ensuring Equitable Access***

- ➔ Implement the EU AI Act robustly within education, mandating 'high-risk' classification for all AIEd systems that significantly impact learners' educational pathways and rights.
- ➔ Establish mandatory, independent, pre-deployment conformity assessments (auditing efficacy, safety, bias, and pedagogical soundness) and continuous post-market monitoring specific to educational contexts.
- ➔ Ensure human oversight remains legally mandated for all high-stakes decisions. Create independent national oversight bodies with expertise in education and child rights.
- ➔ Require full transparency from AI system providers regarding algorithms, training data (including bias audits), data governance, intended uses, limitations, and potential risks.
- ➔ Establish clear liability frameworks and accessible redress mechanisms for individuals harmed by AIEd systems. Prohibit the use of opaque "black box" systems in high-stakes educational contexts.
- ➔ Fund and mandate the integration of comprehensive, human-centric AI literacy curricula, co-created with students and educators, across all levels of education.
- ➔ Curricula must foster critical thinking about AI, ethical awareness, understanding bias, data privacy rights, digital citizenship, and algorithmic impact, aligning with initiatives like the European Year for Digital Citizenship Education.
- ➔ Commission independent, longitudinal research on the pedagogical, ethical, social, and equity impacts of AI tools in diverse educational settings before permitting widespread adoption.
- ➔ Guarantee significant public investment in digital infrastructure, devices, connectivity, and technical support for all learners and educational institutions, bridging the digital divide.
- ➔ Prioritize funding for Open Educational Resources (OERs) and publicly developed, open-source AI tools. Mandate environmental impact assessments for large-scale AI deployments in education.

Demands to Educational Institutions & School Leaders: ***Establish Clear Policies & Safeguards, while ensuring meaningful Student Participation***

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- ➔ Develop clear, transparent, and accessible institutional policies (co-created with students, staff, parents, and unions) governing the ethical use of AI, strict data protection (GDPR compliance), academic integrity (focusing on assessment redesign), bias mitigation strategies, and mandatory human oversight for all significant decisions impacting learners.
- ➔ Explicitly protect the right to human interaction and the right to disconnect.
- ➔ Guarantee the systematic and meaningful involvement of learners and democratically elected student councils in all decisions regarding AI adoption—from initial needs assessment and tool selection to co-designing implementation, piloting, ongoing evaluation, and policy development.
- ➔ Ensure participatory processes are inclusive and accessible.
- ➔ Provide continuous, high-quality, mandatory professional development for all educators and staff on critical AI literacy, pedagogical integration strategies, ethical considerations, identifying and mitigating bias, and supporting student well-being in AI-mediated environments.
- ➔ Prioritize the procurement of AI tools that are transparent, evidence-based, privacy-preserving by design, accessible, pedagogically sound, and aligned with institutional values.
- ➔ Demand verifiable evidence of effectiveness, safety, and ethical safeguards from vendors before purchase or deployment.
- ➔ Favour open-source and publicly audited systems where feasible.

Demands to Private Sector and AI Education Companies

- ➔ Adhere strictly to privacy-by-design principles, ensuring full compliance with GDPR and the AI Act, especially regarding minors' data. Implement robust security measures, data minimization, and transparent data governance.
- ➔ Provide clear, user-friendly control and opt-out mechanisms. Prohibit biometric surveillance, emotion tracking, and social scoring functionalities.
- ➔ Provide complete transparency regarding algorithms, data sets (including rigorous bias assessments and mitigation efforts), intended functionality, limitations, and potential risks.
- ➔ Actively facilitate independent, third-party audits focusing on bias, pedagogical validity, safety, and ethical compliance.

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- ➔ Develop AIEd tools based on robust pedagogical research and evidence, demonstrably supporting learning goals and critical skills development rather than replacing them.
- ➔ Engage in genuine co-design processes with educators and diverse groups of learners throughout the development lifecycle.
- ➔ Design and build all tools to meet or exceed internationally recognized accessibility standards (e.g., WCAG) to ensure usability for all learners, including those with disabilities.

In conclusion, OBESSU demands are aimed towards all relevant policymakers, institutions, educators, technology developers, and learners themselves. This is our **call for action towards embracing a rights-based approach to AI in education**.

AI must never be an end, but a carefully governed tool to support and ensure the equitable access, holistic development - including critical thinking that advances the respect and protection of rights of all students.

OBESSU will continue engaging with Member Organisations and stakeholders across the region and beyond. Monitoring developments on AI and its impact on Education, while committed to continue advocating for learners' rights, and empowering school student unions across Europe to shape an ethical and empowering technological future for education.

About OBESSU

The Organising Bureau of European School Student Unions (OBESSU) represents school students in Europe since 1975 and has ever since been advocating for participatory, inclusive and quality education for all.

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