A child rights audit of GenAI in EdTech: Learning from five UK case studies

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About this report

This report is for everyone concerned with children's digital lives at school. It will mainly interest those seeking to protect and empower children in the context of today's increasingly AI-facilitated education. It particularly addresses policymakers, educators, child rights advocates and researchers. It examines different GenAI in EdTech use cases in or for education to identify whether and how these new tools support or undermine children's education, privacy and safety, as well as other rights.

Executive summary

Generative artificial intelligence (GenAI) tools are increasingly embedded in digital services and products that are used for and in education (EdTech), raising urgent questions about their impact on children's learning and rights. We take a holistic child rights approach to children's learning to evaluate five GenAI tools used in education – Character.AI, Grammarly, MagicSchool AI, Microsoft Copilot and Mind's Eye. Using sociolegal methods, including product walkthroughs, policy analysis and consultations with children, educators and experts around the world, we evaluate how these digital tools operate and assess their claims.

The report is framed by the United Nations Convention on the Rights of the Child (UNCRC) and the Committee on the Rights of the Child's General comment No. 25 regarding the digital environment. It asks how these tools uphold key rights under the UNCRC, including children's rights to education (Article 28), privacy (Article 16), to be heard and have their views respected (Article 12), non-discrimination (Article 2), the principle of the best interests of the child (Article 3.1), the right to appropriate support for children with disabilities (Article 23), access to information (Article 17) and freedom of expression (Article 13).

While each GenAI tool offers the potential to facilitate learning through, for example, supporting creativity, communication and accessibility, each also presents notable risks. These risks arise because of opaque data practices, poor transparency, commercial exploitation through nudges, advertising and tracking, including from age-inappropriate adult website advertisers, all of which are incompatible with children's best interests. Overall, many claimed benefits remain unverified, and the increasing presence of GenAI and its increasingly 'by default' integration reflects institutional or market priorities more than children's needs and interests.

Across the five tools, children's perspectives were largely excluded from their design, governance and evaluation. The case studies reveal that these tools undermine children's rights to privacy and protection from commercial exploitation. The tools may support rights such as education, play, expression and access to information, potentially enhancing children's learning, but there is limited evidence for these benefits, notably

for diverse or younger groups of children and those with disabilities.

Key findings from the case studies:

- Although marketed as an educational and supportive tool, **Character.AI** risks to children's rights and wellbeing due to insufficient safeguards (as evidenced by ongoing litigation), misleading or harmful content, and design that fosters unhealthy emotional dependency. While it can offer some creative and motivational benefits (e.g., Article 13), especially in informal learning contexts, the risks it poses, particularly for vulnerable children (such as young children, children suffering from mental health issues and children with disabilities), may amount to violations of children's rights to information (Article 17), education (Articles 28, 29), health (Article 24), privacy (Article 16), and non-discrimination (Article 2).

- While **Grammarly** can support children's learning and expression, particularly for language learners and children with additional needs (Article 23), the audit found that Grammarly processes children's data in ways that contradict its own privacy commitments. Further, it promotes inaccurate and potentially harmful AI detection tools that jeopardise student–teacher trust and lack child-friendly safeguards or remedies. These practices risk violating children's rights to privacy (Article 16), protection from commercial exploitation (Article 32), and being treated in their best interests (Article 3).

- **MagicSchool AI** claims to reduce teacher workload and support student learning. However, we identified several ways that its design and data practices risk undermining children's rights. For instance, despite the company's stated privacy commitments, children are, by default, exposed to commercial tracking (including from adult site advertisers), and chatbots have been found to provide misleading assurances and inappropriate or unsafe responses. This lack of safeguards, reliable emergency support, and rights-based information means that children's rights to privacy (Article 16), protection from commercial exploitation (Article 32), information (Article 17), and health and safety (Articles 6, 24, and 19) are at risk.

- **Microsoft Copilot**, embedded in Microsoft 365 tools widely used in UK educational settings, is increasingly accessed by children despite originally being intended for adults. While it can support

accessibility, expression, and reduce teacher workload, particular risks arise from its design and deployment. A Dutch data protection impact assessment (DPIA) identified significant privacy concerns, including fabricated personal data, opaque filtering, and extensive tracking. Our research revealed that when a child user accessed the service, commercial trackers were activated, including advertising trackers such as Google Ads. Copilot lacks a child rights impact assessment, clear opt-out options, and transparency about hidden filters. These practices can undermine children's rights to privacy, agency, and protection from exploitation (Articles 16, 32–36), while overreliance risks weakening core skills and trust in education.

- **Mind's Eye** is a GenAI art expression tool to support children and adults with disabilities, using features such as eye tracking technology and predictive text to enable participation in creative tasks. It offers significant potential to enhance children's freedom of expression (Article 13) and the rights of children with disabilities (Article 23), particularly for those excluded from mainstream GenAI tools. However, biased or inappropriate suggestions risk undermining expression and engagement, while privacy practices raise concerns about opaque data-sharing practices and lack of child-friendly rights mechanisms (Articles 16, 17 and 32). Without child-specific research, transparency and accessible safeguards, the tool risks reinforcing inequalities rather than removing them.

We conclude that GenAI can only enhance education if children's rights are at the centre of its design, development, deployment and governance. A holistic, child rights-based approach should guide decisions about GenAI use in education, ensuring that children's best interests, participation and full range of rights are prioritised, notably the right to education. The benefits of GenAI in EdTech can only be fully achieved when learning is recognised not as an isolated outcome, but as a process supported by interconnected rights. This means mandatory child rights and data protection impact assessments, accessible safeguards, and meaningful participation of children in decision-making. Without these, children's right to education can be undermined, and GenAI risks deepening inequalities and exploiting children, rather than supporting their learning.

Introduction

Education is at a turning point. The global educational technology (EdTech) market was estimated at US$163.49 billion in 2024 and is expected to grow globally at a compound annual growth rate of 13.3 per cent through to 2030.[1] As part of this growth, EdTech is increasing, with ever more students and teachers using generative artificial intelligence (henceforth GenAI) tools. AI is being rapidly integrated into educational settings, a trend that was supercharged during the pandemic and continues with significant momentum.[2] Despite the high expectations for AI, especially GenAI, to facilitate EdTech in ways that enhance children's learning and development, significant legal, ethical and pedagogical concerns persist with a lack of sufficient evidence about its actual educational value and the long-term effects on children's lives.[3]

Integrating GenAI features into existing EdTech systems has generated optimism about its potential to enhance teaching and learning experiences. Although not all these GenAI tools were designed exclusively for education, children use them to brainstorm, do homework, revision or self-directed learning. But these tools raise significant concerns, which include, for example, the risk of amplifying existing data processing issues – such as discriminatory or commercially exploitative data practices – and the emergence of new challenges, including the potential erosion of trust between students and teachers.[4]

Taking a step back from the utopian and dystopian debates, we focus on what is happening today to ask what we know and what steps are required. To understand what is best for children today and in the future, we must assess how GenAI tools used by children affect their learning, digital lives and the full spectrum of their rights. This report explores real-world UK case studies that steer the conversation towards the critical and still unresolved questions: What does 'good' look like for the use of GenAI in education that respects children's rights? How close are current practices to realising that essential vision?

[1] Grand View Research (2025).
[2] See, for example, Alan Turing Institute (2025a, b); National Literacy Trust (2025), Samson & Pothong (2025).
[3] Atabey (2024); Holmes and Tuomi (2022); Holmes (2023); Kucirkova et al. (2023); Livingstone et al. (2021).
[4] See, for example, Luo (2025); Tobin (2023).

Children's rights and EdTech

The UN Convention on the Rights of the Child (UNCRC) (UN, 1989) is the most widely ratified international human rights treaty. It protects and empowers all children from birth to age 18. A child rights approach is holistic, requiring states and private sector actors to ensure children's protection, participation and provision rights.[5] The UNCRC sets out children's rights, underscoring that they apply to all children irrespective of their differences, such as age groups and vulnerabilities. The UN Committee on the Rights of the Child's *General comment No. 16* (2013) recognises that the duty to ensure children's rights are protected extends to the business sector.[6]

In the digital environment, the authoritative framework for interpreting child rights obligations and responsibilities is the UN Committee on the Rights of the Child's *General comment No. 25* (2021) on children's rights in relation to the digital environment. Its holistic yet practical approach should inform the application of existing and development of new laws and policies in the UK and globally, including those regulating the use of EdTech and AI in education:

> ***States parties should develop evidence-based policies, standards and guidelines for schools and other relevant bodies responsible for procuring and using educational technologies and materials to enhance the provision of valuable educational benefits. Standards for digital educational technologies should ensure that the use of those technologies is ethical and appropriate for educational purposes and does not expose children to violence, discrimination, misuse of their personal data, commercial exploitation or other infringements of their rights.***[7]

Since much EdTech is commercial, and deployed in and by public schools where children have little or no choice as to its use, it is important to note that:

> ***Businesses should respect children's rights and prevent and remedy abuse of their rights in relation to the digital environment. States parties have the obligation to ensure that businesses meet those responsibilities.***[8]

Evaluating the impact of AI use in education on children's rights is a holistic and comprehensive task. All children's rights are interrelated, and there is no hierarchy

[5] UN (1989); see also Livingstone & Sylwander (2025a, b); Livingstone & Pothong (2023, 2025).
[6] UN Committee on the Rights of the Child (2013), especially paras 28, 42 and 82.
[7] UN Committee on the Rights of the Child (2021), para. 103.
[8] UN Committee on the Rights of the Child (2021), para. 35.

between them. This means a full child rights audit of each tool would require adopting a holistic approach. Still, some rights are more salient in relation to EdTech, and here, *General comment No. 25* serves as the guiding light for the five case studies (see Table 1).

Table 1: Key children's rights relating to GenAI in EdTech

UNCRC Article[9]	***General comment No. 25***
Article 2, Non-discrimination	paras 9-11
Article 3, Best interests of the child	paras 12-13
Article 5, Parental guidance and a child's evolving capacities	paras 19-21
Article 6, Life, survival and development	paras 14-15
Article 12, Respect for the views of the child	paras 16-18
Article 13, Freedom of expression	paras 58-61
Article 14, Freedom of thought, belief and religion	paras 62-63
Article 15, Freedom of association	paras 64-66
Article 16, Right to privacy	paras 67-78
Article 17, Access to information	paras 50-57
Article 19, Protection from violence, abuse and neglect	paras 80-83
Article 23, Children with disabilities	paras 89-92
Article 24, Health and health services	paras 93-98
Articles 28, 29, Right to education and goals of education	paras 99-105
Article 31, Right to culture, leisure and play	paras 106-111
Articles 32, 36, Child labour and other forms of exploitation	paras 40-42, 112-116
Articles 40, 41, Access to justice and remedies	paras 43-49
Article 42, Knowledge of rights	paras 32-33

[9] Article names and summaries are adapted from UNICEF (2019) and UN Committee on the Rights of the Child (2021).

Definitions

Term	Definition[10]
Artificial intelligence (AI)	'A branch of computer science dedicated to creating systems capable of performing tasks that typically require human intelligence.[11] There are different categories of AI systems, such as emotion recognition systems, chatbots and online search and recommendation systems.
AI literacy	A type of digital literacy that refers to individuals' competence to know and comprehend the key concepts and features of AI, enabling them to use AI tools effectively and meaningfully in daily life.
Assistive technology (AT)	An umbrella term for products and related services used by people with various kinds of disabilities to enable and enhance their inclusion in all participation domains.[12] AT is primarily used in education to help students with disabilities (e.g., a screen reader to help children with learning disabilities).
Child	Any person under 18, unless 'under the law applicable to the child, majority is attained earlier'.[13]
Children's rights	Children have the same human rights as adults and must be recognised as full rights holders. The UNCRC recognises that children, defined as all persons below 18, have additional rights to protection and support, due to their particular vulnerabilities and evolving capacities. Children's rights include civil, political, economic, social, health and cultural rights, and all their rights are interdependent and indivisible.
Education data	Data that schools or other natural or legal persons, on behalf of the schools, process about children at school and through their participation in school. This covers data collected for teaching,

[10] Unless specified, definitions are adapted from the Digital Futures for Children (DFC) glossary (Atabey et al., 2024).
[11] Council of Europe (2025). See also Council of Europe (2024): "artificial intelligence system means a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that may influence physical or virtual environments. Different artificial intelligence systems vary in their levels of autonomy and adaptiveness after deployment."
[12] See DfE (2024a).
[13] See UNCRC (1989) Article 1. For the definition of a child in the countries of the UK, see NSPCC (2024).

	learning and assessment, and used for safeguarding and administration.[14]
EdTech	Technology deployed by schools for educational purposes that is used by or impacts on children. It covers various tools, including digital platforms, learning management systems, online resources, AI character chatbots, educational apps and software.
Generative AI (GenAI)	A subset of AI that uses generative models to produce new content such as text, images, videos or other forms of data. Typically, these models are trained on extensive datasets, which allows them to exhibit a broad range of general-purpose capabilities.[15]
Large language models (LLMs)	Also called foundation models, these are trained on large amounts of text data to generate human-like language responses to queries, appearing to digest a question, for example, as they predict an expected response or next word by analysing the data.[16]
Personal data	Any information relating to a natural person (data subject) who can be identified, directly or indirectly, by reference to an identifier such as a name, identification number, location data, online identifier or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.[17]

[14] The UK Data Protection Act 2018 defines 'education data' as 'personal data which consists of information that forms part of an educational record; and is not data concerning health.' 'Educational record' differs by UK country (ICO, 2025a).
[15] See 5Rights Foundation (2025); ICO (2025b); Zewe (2023).
[16] See 5Rights Foundation, 2025); Bommasani, et al. (2021).
[17] See ICO (2025d).

Why the research is needed

Research questions

This report examines the current state of AI use within the UK EdTech landscape, with a particular focus on GenAI features in existing EdTech tools or as a standalone service. It is situated within a child rights approach, which serves as an evaluative and normative framework. We ask one primary research question:

- What evidence exists regarding the risks and opportunities of using GenAI tools on children's educational experiences in the UK?
- In reflecting on the implications of our findings, we also consider:
- What impact might current use cases of GenAI tools have on children's rights now and in the future?

To answer these questions, we conducted a child rights audit of five case studies, as explained in 'Research methods.'

The UK context

Studies show that GenAI tools are already in use by children, teachers and school administrators, with the Department for Education (DfE) reporting that 'there is evidence GenAI tools are being used across most subjects in schools'.[18] A survey by the Scottish Qualifications Authority (SQA) found that while GenAI is mostly used outside the classroom – for teaching preparation and administrative tasks – some teachers are beginning to incorporate it into lessons.[19] Whether used inside or outside the classroom, GenAI use in and for learning impacts on children's rights every day.

Recent guidance about AI use in UK schools comes from DfE England and the Welsh government, among others.[20] DfE guidance focuses on the value of GenAI as a tool for teachers more than as pupils, acknowledging that 'We have limited evidence on the impact of AI use in education on learners' development, the relationship of AI use and educational outcomes, and the safety implications of children and young people using this technology in the classroom.'[21] Such evidence as exists suggests benefits mainly

[18] DfE (2024b, p. 15), see Samson & Pothong (2025) for a review.
[19] For examples of classroom use, see SQA (2024, p. 9). See also DfE (2024b; 2025).
[20] DfE (2025a, b); Renata & Pothong (2025); Livingstone et al. (2021); Atabey (2024, 2025). See also Appendix 1.
[21] See DfE (2025a).

when AI is carefully mediated by teachers.[22] Moreover, while teachers report time savings, they are also gaining new evaluation and verification work (checking for hallucinations, bias and fit to curriculum).[23]

The DfE encourages educators to approach GenAI with caution and clarity of purpose, foregrounding educational aims, product safety expectations and risk assessment before classroom use.[24] Ofcom's online safety programme also warns about GenAI/chatbots' specific risks for children and expects robust risk assessments and mitigations.[25]

With EdTech now present in almost every UK classroom, and AI being embedded at a rapid pace, the regulatory landscape is struggling to keep up. The laws and their enforcement fall behind these practices. Crucially, there is currently little regulation or comprehensive guidance to help educators use AI safely, or to ensure its deployment respects children's rights. Although guidance on the use of GenAI in education is beginning to emerge across the UK,[26] key questions remain unanswered:

- Which rights are at stake?
- Who is responsible for ensuring children's rights are upheld?
- How can children meaningfully enjoy those rights?
- What remedies are available when they are not? And who will be held accountable for their protection?

The UK ratified the UNCRC in 1991, and domestic laws and their implementation across the UK underpin the commitment to the UNCRC.[27] Aligned with this commitment, the UK Government should ensure that businesses, including GenAI and EdTech companies, are held to account for respecting children's rights in digital and non-digital environments. Key UK laws, such as those related to data protection, are crucial for AI

[22] Godwin-Jones (2022).
[23] DfE (2024b); Holmes et al. (2022); Scarfe et al. (2024); Selwyn et al. (2025). Sector bodies provide guidance on GenAI use in assessment and caution against relying on AI detectors, arguing instead for rethinking assessment (SQA, 2025).
[24] DfE (2025a).
[25] Ofcom (2024a, 2025a, b).
[26] See DfE (2023a, 2025a); SQA (2025); Robertson (2025); Atabey et al. (2025).
[27] For example, laws relating to additional support needs and child protection and the UK Age Appropriate Design Code (AADC); NSPCC (2024). See also Children's Commissioner for Wales (www.childcomwales.org.uk/about-us); Children's Commissioner (www.childrenscommissioner.gov.uk/about-us/the-childrens-commissioner-for-england); NASUWT (n.d.). The Rights of Children and Young Persons (Wales) Measure 2011 ensures that children's rights are included in all legal and policy frameworks in Wales. In 2024, Scotland incorporated the UNCRC into its domestic law in the United Nations Convention on the Rights of the Child (UNCRC) (Incorporation) (Scotland) Act 2024.

use in education and apply across all four nations.[28] The UK's devolved education system across four nations adds complexity to AI governance (see Annex II).[29] However, GenAI tools and the decisions about their use impact all children in the UK. Further, the UNCRC and *General comment No. 25* apply to all children across the UK equally. Fragmented policies and the absence of clear benchmarks can mean that children's rights are unequally realised.

We note that, where relevant, the laws in the UK should explicitly reference children's rights,[30] so that digital innovation is introduced into children's lives only once child rights issues have been addressed. We note that all existing laws governing AI use in education must be interpreted and enforced with children's rights at the centre. This means going beyond a simple checklist approach to compliance and ensuring that references to children's rights are matched by understanding and application. We therefore call on parents, teachers, businesses, regulators, policymakers and other stakeholders to ensure that GenAI tools in education enhance, rather than undermine, children's ability to fully realise their rights.

Hopes and concerns about UK children and GenAI

Emerging research in the UK is exploring children's experiences of GenAI but little research focuses on uses of GenAI in educational settings, and even less considers the impact on children's rights. This gap matters since, without such analysis, policies risk overlooking the specific ways in which AI can alter power dynamics in schools.[31] It can also reshape learning relationships in classrooms and create new forms of inequality, exclusion, exploitation or risk, all key factors impacting children's education.

While GenAI use in education grows, increasingly integrated into EdTech tools, policy focuses on GenAI's potential to enhance classroom engagement, support learning, improve accessibility, assist children with disabilities and reduce educators' assessment and administrative workload through increased efficiencies.[32] This has been

[28] A non-exhaustive list of relevant laws and regulations includes the Education Act 2011, Human Rights Act 1998, Equality Act 2010, Online Safety Act 2023, UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, Age Appropriate Design Code, Data (Use and Access) Act 2025 (DUAA), UNCRC (Incorporation) (Scotland) Act 2024, and the Copyright, Designs and Patents Act 1988.
[29] Roberts et al. (2023).
[30] See for example, UK Parliament (2025); ICO (2021) AADC; 5Rights Foundation (2025b).
[31] Such concerns were evidenced in our earlier research, for example, Kidron et al. (2023); Turner et al. (2022). See also www.digital-futures-for-children.net/our-work/edtech-summary
[32] DfE (2025a).

accompanied by concerns, particularly around academic dishonesty, echoing and intensifying debates about EdTech's commercial data practices.[33]

Studies in the UK show that children have both hopes and concerns about AI use in education, and their concerns are not always the same as those of adults. For example, in a study on responsible GenAI use in UK schools, children aged 14-17 expressed concerns about their agency, the educational value of AI use in schools and privacy and surveillance.[34] The Alan Turing Institute found that children aged 9-11 emphasised problems of trust (linked to disinformation) as well as the environmental impacts of GenAI as a significant concern and called for action to address these issues in its future development.[35] While some studies report varied experiences among children in the UK, evidence on their views, especially those of younger children and children with disabilities, remains limited.[36] This research gap is concerning, given that these groups are often seen as key beneficiaries of GenAI in education.

Further findings suggest that educators either do not feel equipped to incorporate AI tools effectively or find the current tools unreliable and call for more guidance for using GenAI. Hence, capacity development and building are urgently needed for teachers. In Northern Ireland, *The Science Teaching Survey 2024* revealed that 33 per cent of teachers had used AI in the classroom, and there is a growing interest in using GenAI in schools.[37] A national survey conducted by the Scottish Children's Parliament to explore the views of more than 500 school leaders, teachers and support staff working with children aged 14 or below in Scotland found that 'teachers and school staff in Scotland currently lack confidence and support in teaching children about AI.'[38]

[33] See 5Rights Foundation (2025a). See also Day et al. (2024); Holmes et al. (2022); Atabey (2024).
[34] Children want companies to be held accountable, and express trust in their schools for AI-EdTech selection for their learning and use. See Atabey et al. (2025a), BRAID (2024).
[35] Alan Turing Institute (2025a, b). The study noted that many children preferred offline creative activities when available, indicating that their engagement with digital technologies depends on the broader context, including environment, access and available alternatives.
[36] See, for example, DfE (2025a). See also Atabey et al. (2025a). Children's expectations are for fair data handling in the context of AI in EdTech to be used in ways that benefit society, keep children safe online and support children with additional learning needs).
[37] Royal Society of Chemistry (2024).
[38] '71% had no or low confidence in addressing the subject with their pupils, and 79% had received no guidance on the use of AI. 93% had not accessed any resources to support teaching children about AI.' Yet '45% of those surveyed have used AI tools in the classroom with children' (Children's Parliament et al., 2025). A small survey by the Association of Directors of Education in Scotland (ADES) found the vast majority of young people and teachers believe AI has a place in the Scottish education system (ADES & Staff College, 2024). Students expressed hopes (e.g., AI's potential for personalised learning and inclusion) and concerns (e.g., data privacy, being accused of academic misconduct, AI detection tools and inaccuracies, and potential adverse effects on human communication).

Research methods

This report employs a child rights framework and an exploratory mixed-methods approach to examine prominent GenAI in EdTech products for their impact on children's rights.

We reviewed the literature across relevant public authorities' websites and reports, as well as scholarly databases and grey literature sources, including EdTech sector reports, teacher blogs, regulatory documents, and audits. The aim was to compare what companies claim their tools can do with their actual use in practice to assess the real-world impact on children's lives and the implications for their rights. This included searching for examples of pedagogical practices drawn from teacher testimonials on forums and EdTech sector-specific reports.[39]

We held a workshop with children and young people (ages 14-21) from 5Rights Foundation Global Youth Ambassador network in March 2025 to understand their hopes, concerns and priorities for change.[40] When asked about AI in education, children and young people first thought about using GenAI for search or homework, and about being accused of cheating. They found it hard to recognise that AI is becoming embedded into their education systems in ways that are not directly visible to them. Reflecting a widespread concern with fairness, they called out inequalities in digital access and skills within and across countries. Additional points included how AI can be helpful for tailoring their learning, and they expressed concerns about AI disseminating false information and exhibiting bias toward different people and languages.

We consulted educators, policymakers and EdTech experts, including privacy engineers, designers and developers, about the educational benefits and harms and good practices, and to check whether our initial selection of GenAI tools reflected the reality they observed in educational settings (see Table 2). We were particularly interested in understanding what priorities should shape our report and which implications they found most pressing. We also consulted experts on how to obtain a visual representation of website tracking and data activities using tools such as Ghostery.

[39] We searched for the names and variations of selected tools in databases (Westlaw, ERIC, Web of Science, ScienceDirect, and SCOPUS) and through manual searches of company websites and industry reports. After screening titles and abstracts and excluding non-English sources from the databases, it was clear there is a paucity of peer-reviewed research focused on these tools. Hence, we included grey literature, such as sector reports, newspaper articles and teacher blogs.
[40] See Atabey et al. (2025a). During the workshop, we used a participatory design futuring method, starting with participants' reflections and questions, then examining scenarios informed by our prior research on EdTech and data practices, and finally envisioning utopian and dystopian futures for AI in education over the coming decades.

Table 2: Experts consulted during the selection and analysis of case studies

No.	Organisation	Expertise / role
E1	Company providing software and hardware to schools (international)	Privacy / engineer
E2	Company providing cloud services to schools (international)	Privacy / IT expert
E3	Small-sized company (Italy)	Education / EdTech consultant
E4	Secondary school (UK)	Education / teacher
E5	Primary school (UK)	Education / teacher
E6	Secondary school (Türkiye)	Education / teacher
E7	University (UK)	Education / academic
E8	EdTech higher education provider (UK)	Education, tutor and consultant
E9	Company supporting the education and wellbeing of children with diverse needs (international)	Health / education company founder
E10	AI consultancy firm (UK)	Privacy / data scientist
E11	Entertainment company (games) (UK, EU)	Privacy / Data Protection Officer (DPO), lawyer
E12	EdTech company (international)	Privacy / DPO, lawyer
E13	Company providing cloud services in the UK education sector (international)	Privacy / learning solutions specialist
E14	University (Norway, UK)	Education / academic in EdTech
E15	University (UK)	AI ethics, regulation / academic
E16	Venture capital (with EdTech portfolio) (UK)	Investor /analyst

Each case was audited using in-depth product walkthroughs, content analysis of marketing materials focusing on claims made on the company websites and review of privacy policies and terms of service, complemented with the use of tools including

Ghostery,[41] to inform our data protection law assessments (focusing on the UK Age Appropriate Design Code (AADC), which is underpinned by the fairness principle (Article 5(1)(a)) of the UK GDPR.[42] The AADC has become the gold standard for children's privacy and requires considering how data practices can be in children's best interests and respecting their rights under the UNCRC. We carried out assessments for each tool (in December 2024 and February 2025 and repeated in August 2025) to observe any changes and update our audit results for the right to privacy and protection from commercial exploitation (see Annex I). We identified our questions after reviewing the compliance metrics and guidance documents published by the Information Commissioner's Office (ICO) and European Data Protection Board (EDPB), and company policies to identify good and bad practices evidencing compliance with the law. We reviewed each company's privacy and other relevant data policies available on their website (e.g., Microsoft data protection addendum[43]) between December 2024 and February 2025 to inform our AADC analysis and review of the current data practices and purposes for which children's data (personal, non-personal or anonymised data) are processed in the context of schools and home use.

For each case study, we briefly describe the tool, the problem the company seeks to address or the solution it offers, and its relevance to education. We then assess whether the tool delivers on its claims, with a focus on its impact on children's rights, concluding with a summary of our child rights audit. Considering the rapid changes in AI use within the education sector in the UK and globally, in summer 2025, we re-reviewed available evidence from company reports. The research was approved by the Research Ethics Committee of the London School of Economics and Political Science (LSE).

Selecting the case studies

The case studies comprise diverse types of GenAI use in education already used in UK schools. We identified them by consulting a range of relevant experts, especially educators, and ensuring that for each case chosen, some evidence was available against which the claims made by the companies could be checked. While there is emerging evidence that the selected tools for case studies are used for educational purposes by students and teachers in the UK, how widely they are used by or impact on diverse

[41] Ghostery (2025a, b). We explored a wide range of tools such as Cookiebot™, Lightbeam.AI, Lightbeam (2013), DisconnectMe, Ghostery, Datadog and OneTrust. Tools such as Ghostery offer limited visibility of the actual tracking or data practices. The privacy experts we consulted thought no tool provides an accurate visualisation of how children's digital footprints are data processed within or across platforms. Nonetheless, these tools can help reveal data practices.
[42] See ICO (2025c) for recent changes to data protection law in the UK.
[43] Microsoft (2025d).

groups of children in schools across the UK remains largely unknown.[44] With our selection we aimed to represent the current hopes of stakeholders in the UK regarding the opportunities GenAI tools claimed to offer for and in education (e.g., saving teachers time, supporting children with disabilities). The case studies are as follows:

Character.AI, although not specifically designed for the education setting, is used by children in the UK for educational and mental health support.[45] Its popularity among children provides an opportunity to examine the child rights implications of AI character chatbots, which are increasingly embedded in EdTech as additional features (e.g., MagicSchool AI, Apple Education).

Grammarly integrates an AI companion and GenAI features. It is offered to UK schools, teachers and students for personal or institutional use, and is one of the most widely used EdTech tools outside of schools worldwide. Its AI detection and plagiarism features are widely deployed by schools and beyond, impacting students' educational lives and relationships with educators.[46]

MagicSchool AI is a GenAI-facilitated platform that provides over 80 tools for teachers (MagicSchool AI for educators) and over 50 tools for students (MagicStudent). Teachers can generate lesson plans, quizzes, rubrics, levelled texts and video-based questions. Students can create study guides, practice quizzes, summaries and simplified explanations of complex topics.[47]

Microsoft Copilot is a GenAI function embedded into the Microsoft 365 Education platform. Children and teachers in the UK use Copilot for purposes such as accessing information, brainstorming ideas, breaking down complex concepts into easier digestible content and revising for exams (note that some schools are early adopters).[48]

Mind's Eye is the only GenAI tool we found after reviewing the AT (assistive technologies) mentioned in the DfE AT research, Call Scotland and the AT, in particular the augmentative and alternative communication (AAC) tools available on the NHS

[44] Even less is known of use by different school types (e.g., multi-academy trusts (MATs), public, private, state schools, home schooling) and systems across the UK.
[45] Ofcom (2025c, p. 41); see also Tidy (2024). Snapchat includes a popular AI chatbot used by UK children (ICO, 2024).
[46] See Rittman (2023); Young (2024).
[47] MagicSchool AI (2025d). In summer 2025, the company announced its upcoming AI Operating System for Schools www.magicschool.ai/magicschool-live). Some examples of tools on the MagicSchool AI platform are 'Study Bot' – 'Tutor me with AI' – which aims to help students study or get answers about a subject (personalised 'AI tutoring') tailored to their pace for different tools; see www.magicschool.ai/magic-tools.
[48] See, for example, LGA (2025). Children already use Copilot for learning purposes (Alan Turing Institute, 2025a, b; Children's Parliament et al., 2025; DfE, 2025a; Microsoft, 2025).

website embedded in AT (Smartbox AAC Grid for Schools) designed to help children with disabilities in school settings in the UK.[49]

Study limitations

This study began in November 2024, when there was limited evidence of GenAI tools being used in school settings. At the time, GenAI adoption was primarily observable in higher education and workplace contexts, where such tools were being incorporated into platforms for writing, communication and productivity.

While the case studies demonstrate examples of the current reality of child rights implications of AI use in EdTech, they should be taken as indicative but not comprehensive in their implications for the EdTech landscape. Identifying the case studies was difficult in a context in which there is no authoritative list of EdTech in use in UK schools, let alone a list of GenAI in EdTech tools being used, formally or informally. It was also difficult given that such new tools can be used in different ways, and they are associated with little robust research available in the public domain.

Considering GenAI features are often embedded within existing EdTech tools or accessed through standalone apps on tablets rather than via web browsers, it remains difficult to detect and monitor tracking and data processing practices using tools like Ghostery. Whether integrated into larger systems or used independently, the lack of transparency in how these tools operate creates significant uncertainty for educators, parents and policymakers. It remains unclear who is processing children's data, how that data is used and what the implications are for children's rights, particularly their right to privacy, dignity and agency in educational settings.

Challenges include the many unanswered questions and notable complexities of data practices. For instance, it remains unclear how Copilot within Microsoft 365 Education or embedded features within the MagicSchool AI platform operate in practice[50] – what data are collected, how they are integrated into classroom use or whether children's data are processed solely for educational purposes. Another example is Mind's Eye, which does not provide a privacy policy on its website. The tool can only be used as an app. For Mind's Eye, it was not possible to use tools such as Ghostery on browsers to observe tracking or identify relevant data practices, and it remains unknown what data

[49] Call Scotland (www.callscotland.org.uk) and NHS England Specialised AAC and EC Services (https://assistivetechnology.org.uk/#covid). We also reviewed relevant research and practical reports on AT use in the UK, such as DfE (2010); Nasen & Empowering Tech (2023); Smartbox Assistive Technology (2020); Slaughter & Griffiths (2025). For a list of AAC services in England, see https://assistivetechnology.org.uk/#aac-services. See https://thinksmartbox.com/grid-for-schools/

[50] MagicSchool AI (2025a). For another example of integrations, see Anthropic (2024).

processing takes place across other apps or services children can use on their devices.[51] Such information is key for assessing auditing compliance with the right to protection from commercial exploitation.

In this report, we tried multiple approaches to conducting a child rights audit of GenAI EdTech products; not all of them were straightforward or equally informative. As with our choice of case studies, we believe the results should be taken as indicative, and we look forward to the development of further analytic approaches in the future.

Case study findings

Character.AI

Character.AI is an AI chatbot service (called an AI companion) that allows users to talk with AI characters, some of whom are modelled after real or fictional people.[52] The tool is accessible through both the website and app versions. Although primarily intended for entertainment, the company refers to educational use among its goals. It is used in educational contexts for creative writing, language practice, informal tutoring and more. Children also use it for emotional support and mental health conversations.[53]

Claims and realities in educational contexts

Character.AI claims to be building towards artificial general intelligence (AGI) with a future vision to enhance education, coaching, support and creativity.[54] It claims to support learning, brainstorming and writing by simulating conversational interactions and offering an empathetic chatbot experience. It claims to prioritise 'teen' safety for its

[51] See for example, accessible apps provided on Grid. See Smartbox (2025). Particularly challenging is the importance of identifying the data processing by GenAI tools when integrated within already-used hardware and software. This is crucial to addressing the risks that arise during mergers and acquisitions or change of ownership of EdTech companies.
[52] Character.AI (2025).
[53] See Internet Matters (2024). Character.AI is available on a website or as an app on mobile phones or tablets operating on iOS, Windows and Android (see https://apps.apple.com/us/app/character-ai-chat-talk-text/id1671705818). Note that the minimum age is 17 in the App Store (Mehta, 2025). See also Google Play Store. For the latest updates, see Character.AI (2025).
[54] 'At Character.AI, we're building toward AGI. In that future state, large language models (LLMs) will enhance daily life, providing business productivity and entertainment and helping people with everything from education to coaching, support, brainstorming, creative writing and more' (Character.AI, 2024a). The company claims 'Character.AI isn't just another AI chat app – it's an infinite playground for your imagination, creativity, and exploration. Dive into immersive conversations, create your own AI chatbots, and join a vibrant community of creators, just like you' (https://apps.apple.com/us/app/character-ai-chat-talk-text/id1671705818).

'young users.'[55] Character.AI has become a popular tool among children due to its engaging and seemingly empathetic media characteristics.[56]

Our review of existing literature reveals that teachers and students use Character.AI for learning and teaching, such as in history classes, for creative writing and language practice.[57] In addition to formal and informal learning contexts, children use Character.AI to help them cope with challenges they face in their daily lives in or outside school (e.g., as therapeutic guidance to tackle loneliness, engage in romantic chats or share their worries).[58] Children in the UK and other countries use Character.AI in formal and informal learning settings in schools and at home, which impacts their daily school lives and learning in various ways.[59]

Although the use of Character.AI in education is primarily anecdotal,[60] the platform warrants scrutiny given ongoing legal and regulatory action against the company, and growing concerns about its impact on children.[61] Reports highlight risks including age-inappropriate content, advice that can endanger health and wellbeing and design features that foster unhealthy engagement and emotional dependency. This indicates that it can impact children's right to life (Article 6) and health (Article 24).[62]

Child rights audit in the context of education

AI chatbots, especially Snapchat (My AI) and Character.AI, may bring some educational benefits, for example, for students facing difficulties in both academic and social settings. These can create opportunities for children to participate and play in the digital world. Blake and colleagues note that 'Users are role-playing with characters in creative, expressive and playful ways. Some youth creators engage in extensive world and lore

[55] Character.AI (2024b).
[56] See Bakir & McStay (2025); McStay (2023).
[57] See Ramin (2025). There are other emerging use cases for character creation and use in AI-based apps, such as School AI by educators in the UK. School AI claims to 'Personalize learning for every student, save time, differentiate teaching, and increase engagement' (SchoolAI, 2025).
[58] Tidy (2024); Tiku (2024a).
[59] Children may use Character.AI as a search tool, for language learning or advice for their social or romantic lives. The output of Character.AI responds to children and so varies in its content and likely impact. For example, children who use it to chat with Daisy in *The Great Gatsby* will get a different response than when they ask for advice about how to treat bullies or unfair teachers in school or engage with a character that gives advice about romantic relationships. Any of these may affect their social and emotional state, wellbeing and even relationships with their peers in schools.
[60] See Kentz (2024); Ramin (2025).
[61] *Garcia v. Character Technologies, Inc*., 6:24-cv-01903 (M.D. Fla. 22 October 2024); Gerken (2024); Ofcom (2024c). See also Daniel (2025); Roose (2024).
[62] See *Garcia v. Character Technologies, Inc*., 6:24-cv-01903 (M.D. Fla. 22 October 2024); Ofcom (2024a). Note that '[C]hatbots to act as "virtual clones" of real people and deceased children, including Molly Russell and Brianna Ghey. These distressing incidents have raised questions about how the UK's Online Safety Act will apply to Generative AI' (Ofcom, 2024c). For examples of harm, see Smith & Kelly (2024); Vallance (2024), given the increasing popularity of AI character chatbots and avatars integrated into EdTech tools such as MagicSchool AI (www.magicschool.ai/magic-tools).

building, both for original works and "fan fiction".'[63] Educators report that students use these platforms as motivational coaches or informal advisers, helping them navigate conversations, such as drafting text message responses or interacting with teachers, and that many turn to Character.AI when feeling bored, stressed by schoolwork, or anxious about exams. These use cases illustrate how Character.AI may enable children's communication and wellbeing (coping with stress), which affects their learning experiences.

Given these potential benefits, excluding children from the platform may also come at a cost to children's rights, including the 'right to freedom of expression which includes the freedom to seek, receive and impart information and ideas of all kinds, using any media of their choice', and as *General comment No. 25* highlights, 'any restrictions on children's right to freedom of expression in the digital environment, such as filters, including safety measures, should be lawful, necessary and proportionate'.[64]

While emerging use cases with teachers and students suggest that it can be useful for supporting learning, educators have noted several concerns. AI characters have been found to confuse fictional characters with real authors,[65] provide inconsistent information to students and expose children to unreliable or harmful content.[66] Educators have also raised concerns about the inaccuracy of AI-generated responses and the time and responsibility involved in monitoring GenAI tools.[67] Unreliable or misleading information undermines children's right of access to appropriate information (Article 17).[68]

Character AI poses particular risks because of its *emulated empathy*,[69] facilitated by natural language processing and the use of sentiment analysis and features such as simultaneous chats and voice interaction. This can encourage prolonged engagement and negatively impact children's wellbeing. Unlike conversational agents such as Alexa or Siri,[70] these design choices increase the likelihood of children forming emotional attachments. This may include exposure to age-inappropriate content, nudging that

[63] Blake et al. (2024, p.1)
[64] UN Committee on the Rights of the Child (2021), para 59.
[65] Kentz (2024).
[66] See also Robertson (2025).
[67] See, for example, DfE (2024b, p. 27).
[68] Negative examples include the provision of harmful content, such as an AI character encouraging suicide, poor eating habits or violence. Positive examples include accessing information about historical events or famous authors and novel characters to help in English literature or history classes. Yet content that is harmful, biased or inaccurate can undermine learning experiences. This right is closely interlinked with other rights; it depends on ensuring safety and age-appropriate content, but children can be excluded from it because of compliance with other laws, such as for safety.
[69] Bakir et al. (2024). Bakir & McStay (2025) note that AI companions may create what the IEEE 7014-2024 standard calls 'emulated empathy', a simulated form of empathy that risks misleading or manipulating users. See also Kurian (2024).
[70] Atabey et al. (2023b); Fetterolf & Hertog (2025); Wiederhold (2018).

makes disengagement difficult and the promotion of harmful behaviours such as unhealthy eating, as well as interactions that evoke distress or leave children feeling unsettled[71] or emotional distress.[72] This is particularly concerning for vulnerable children,[73] such as younger users or those with mental health or social challenges, who may struggle to distinguish fiction from reality.[74] Such attachments can prompt the oversharing of personal information, thereby heightening the risks of privacy breaches and the commercial exploitation of their data.

These risks are exacerbated for particularly vulnerable children[75] as they are more susceptible to the possible harms linked to human-like responses and increased engagement, including deceptive design practices (see Article 2 of the UNCRC on non-discrimination).[76] Anecdotal examples from App Store reviews by child users and Reddit comments highlight additional conditions, including paranoia and psychosis, for users engaging with AI companions, including Character.AI. It appears that not all children with diverse needs and vulnerabilities can enjoy their rights in the same way when using the tool. Arguably, this impacts children's right to non-discrimination (Article 2).

While the company claims to prioritise teen safety[77] and privacy, available evidence indicates that it falls short of ensuring that the platform is safe and age-appropriate for children.[78] For example, a lawsuit following the suicide of a teenager and an investigation by *The Telegraph* revealed that Character.AI had given a reporter posing as a child instructions about how to commit murder. Despite updates to its safety policies and character removals prior to the investigation, these changes were found to be

[71] Dupre (2024a, b, c); Kentz (2024); López et al. (2024); Roose (2024); Upton-Clark (2024). For practical examples of AI use in classrooms, see the EdSurge blog (Kentz 2024). See also Young (2024); www.edsurge.com/research/guides/for-education-chatgpt-holds-promise-and-creates-problems

[72] It is important to consider emotional distress that children may experience while interacting with Character.AI or other similar AI chatbots (see an anecdotal Holden AI example of use of Character.AI in a classroom that required teacher intervention and support to help the student, in Kentz, 2024).

[73] See Bakir & McStay (2025). For emotion AI-related risks, see Atabey & Scarff (2023); Bakir et al. (2024); McStay (2023).

[74] See, for example, Ofcom (2025c, p. 41, 2025d); Tiku (2024b).

[75] All children are vulnerable, and some have additional layers of vulnerabilities (e.g., mental health, learning disabilities).

[76] *Garcia v. Character Technologies, Inc*., 6:24-cv-01903, (M.D. Fla. 22 October 2024) ECF No. 1.

[77] Character.AI (2024b).

[78] See, for example, *Garcia v. Character Technologies, Inc*., 6:24-cv-01903, (M.D. Fla. 22 October 2024) ECF No. 1 and *The Telegraph* investigation (Smith 2024). For the AADC, see ICO (2021, 2025d). See also Bakir & McStay (2025).

insufficient, risking children's safety and wellbeing,[79] and potentially impeding children's freedom of expression (Article 13).[80]

Other safety concerns include the platform's community feature, allowing children to engage with strangers, which may pose contact-related risks.[81] The company's failure to ensure appropriate safeguards and consider children's best interests may amount to commercial exploitation (see Article 32 and para. 103, *General comment No. 25*).[82] Indeed, it can be argued that children's vulnerabilities are exploited for commercial interest while impacting their rights.[83] A lack of sufficient safety features of EdTech products can impact not only children's safety, but also their opportunities to learn (right to education, Article 28) and express themselves (Article 13). Further evidence is needed on how the company supports and enables children to enjoy and exercise their rights. For example, the tool does not provide any mechanism that children can use to help them report and seek help and remedies.

It is important to adopt an intersectional approach when considering the impact Character.AI has on children with disabilities, whose diverse needs depend on specific conditions. While opportunities of using Character.AI or other similar tools for learning can include creativity and engagement, the special circumstances and additional vulnerabilities of children with diverse needs (e.g., children who struggle with engagement with course materials due to protected characteristics) are rarely considered. While studies report that breaking down information into a chat format and course material engagement through role-play with book characters can help diverse

[79] The company claims Character.AI is safe and protects teens (Character.AI, 2024b, 2025). Examples of commercially exploitative data processing and design practices include the company showing positive reviews and hiding negative reviews by children in the App Store (see the Garcia case), commercial tracking beyond what the company provides in its privacy policy, undermining children's privacy and agency while gaining advantage from such tracking and child users' interaction with the platform that triggers continued engagement with human-like questions without child-friendly warnings or encouragement to take a break (related to Article 31).The product walkthrough and Ghostery) shows the lack of settings that give children an option to opt in (or even opt out) of commercial uses of their data.

[80] Examples relating to freedom of expression include children creating AI characters, engaging in storytelling through playing with these characters and role-playing historical characters. However, since this right is closely interlinked with other rights such as safety and privacy (See *General comment No. 25*) and specific circumstances in countries, the audit result is unlikely to be a straightforward 'yes' or 'no'. Moreover, tensions also exist particularly in the context of right to access to information, debates around content moderation and removal, especially in relation to Discord's integration of Character.AI. Discord was banned in certain countries, for example, Türkiye. This raises questions about the freedom of expression of users. A ban on children's participation would impact Article 13. See Discord (2024); Reuters (2024).

[81] See Dupre (2024a); United States District Court Eastern District of Texas, Marshall Division (www.washingtonpost.com/documents/028582a9-7e6d-4e60-8692-a061f4f4e745.pdf). See also Stokel-Walker (2025).

[82] For examples of data processing-related harms and their related analyses, see Bakir & McStay (2025); Upton-Clark (2024). These may amount to commercial exploitation (see Atabey et al., 2023c).

[83] See Atabey et al. (2023a); see also, *Garcia v. Character Technologies, Inc.,* 6:24-cv-01903, (M.D. Fla. 22 October 2024) ECF No. 1. For another example undermining children's interests and rights, see p. 94 of United States District Court Eastern District of Texas, Marshall Division (www.washingtonpost.com/documents/028582a9-7e6d-4e60-8692-a061f4f4e745.pdf). The failure to consider and provide evidence on how the best interests of the child is considered ex-ante rather than after harms occurred is a responsibility of the companies, which is particularly critical when the risks are high in AI chatbots and related features (e.g., see discussions on emulated empathy and anthropomorphism).

groups of children (e.g., particularly children with learning disabilities), the commonly accompanied mental health conditions that appear with such disabilities and risks relating to anthropomorphism, paranoia and psychosis need attention and further research.[84]

In summary, Character.AI can both create opportunities as well as risks for children. While evidence on its impact on learning is mainly lacking and remains anecdotal, evidence shows that children's use of the tool already affect their rights, and that there is a need for more research on the added value, if any, that Character.AI – or similar use cases such as AI characters in GenAI platforms including MagicSchool.AI – can have on children's daily educational experiences in and outside school.

Grammarly

Grammarly[85] is an AI-facilitated writing assistant that enhances clarity, grammar and writing style. It has expanded its services to include GenAI features (e.g., citation generator, AI Authorship) and AI detection tools.[86] It provides real-time grammar, style and tone suggestions in multiple formats (browser extensions, mobile apps, etc.). Grammarly offers its services to students, teachers, schools, universities and professionals in the UK and beyond. It has recently announced its partnership with Latimer.AI for higher education settings.[87]

Claims and realities in educational contexts

Although Grammarly is primarily used by individuals such as students for schoolwork or personal communication (e.g., checking grammar when texting friends), its impact extends to children's educational experiences, especially regarding assessments. The tool incorporates an AI companion and GenAI features available to UK schools, teachers and students for personal and institutional purposes. Grammarly is one of the most widely used EdTech tools used outside school worldwide. Its AI detection and plagiarism features are accessible to schools, influencing students' educational journeys and their relationships with educators within schools.

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[84] Relevant policies available on the Character.AI website (e.g., privacy policy, teen safety, certifications and accessibility commitments) do not address the needs of diverse groups of children. Overall, the vulnerability factors the company considers seem to remain limited to age (which is different for jurisdictions).
[85] Grammarly (2025f). For education-specific web pages of Grammarly, see https://www.grammarly.com/edu
[86] See Nicholson-Benn (2024).
[87] See Grammarly & Latimer.AI (2025). AI is amplifying the bias, inaccuracy and erasure of diverse cultural data. Latimer claims to be more inclusive and less bias, by incorporating content from lesser-represented cultures, oral traditions, localised archives, grassroots publications and indigenous sources to broaden its cultural awareness and thereby going beyond conventional, and biased datasets, on which LLM's are typically trained.

Grammarly claims to provide 'AI writing assistance that enhances student learning' and promotes 'AI that helps you make the grade. Grammarly is your AI writing partner that makes it easy to raise your grades and meet your goals with real-time writing feedback for school and beyond.'[88] The company claims its AI Authorship and detection features help students ensure academic integrity and authenticity. It claims to help educators and institutions to verify the authenticity of student work and to encourage transparency and honest discussions between students and teachers.[89] Grammarly claims to be committed to responsible AI and has provided a policy to tell students how to use AI responsibly. [90] Indeed, it uses its responsible AI policy when marketing its GenAI and academic integrity-related features, such as AI and plagiarism detection tools, which are additional features that subscribers can use.[91]

Child rights audit in the context of education

Grammarly can help students express their ideas and thoughts more clearly and is, therefore, closely linked to children's freedom of expression (Article 13), thought (Article 14), and participation in the educational context. Grammarly's claim that it can help new language learners has been supported by Huang et al.'s independent research.[92] Others have found the use of Grammarly is particularly helpful for EAL (English as an additional language)[93] and for second language (L2) learners, particularly in English writing.[94] Specifically, combining synchronous corrective feedback with predictive text can ease the cognitive burden on L2 students, helping them write with greater accuracy and lexical variety.[95] Barrot's study on automated written corrective feedback (AWCF) showed that students using Grammarly outperformed a control group, attributing gains to its ability to promote noticing, provide adaptive explanations and encourage self-directed learning.[96] While highlighting the benefits, the study notes barriers, including 'overcorrection, cognitive overload, and limited metalinguistic explanation', that can impact students' educational experiences.[97] Ranalli and Yamashita caution that while immediate feedback can improve accuracy among L2 learners, it can distract learners, overload their working memory and potentially restrict their ability to process feedback

[88] Grammarly (2025a).
[89] Grammarly (2025a).
[90] See Grammarly (2025b, c).
[91] Ibid.
[92] Huang et al. (2020).
[93] See, for example, Bordalejo et al. (2025); Dizon & Gayed (2021, 2024); Ebadi et al. (2023).
[94] Nazari et al. (2021).
[95] Dizon & Gayed (2021, p. 87).
[96] Barrot (2021).
[97] Barrot (2021, 601)

effectively, impacting their long-term language development (impacting their right to education, Article 28).[98]

Grammarly claims that it can help students with learning disabilities. Although not Grammarly-specific, a study conducted with children aged 8-12 found that the use of AI tools for grammar was particularly important for children with specific learning needs and disabilities.[99] Moreover, studies have identified several benefits of using Grammarly for students, such as supporting their independent writing skills.[100]

The effectiveness of Grammarly depends on how children use or perceive the tool (e.g., trust issues impacting student willingness to use the tool and effectiveness in learning).[101] Relatedly, Ranalli notes that trust is a critical factor in student reception of automated feedback and learning motivation.[102] Godwin-Jones reflects on this aspect in the context of Grammarly and highlights the importance of trust in the degree of engagement a user has with the tool.[103]

Grammarly markets itself as a useful tool for educators and institutions for writing assessments. Yet its reliability has been brought into question in academic contexts. An independent study found that Grammarly frequently over-flags errors, produces false positives and fails to account for optional usage in English,[104] raising doubts about its suitability for assessment. The company also promotes an AI detection feature within its AI Authorship tool despite widespread evidence of inaccuracies of AI detection and plagiarism tools.[105] Although Grammarly cautions teachers not to rely solely on detectors, this contradictory stance shifts responsibility onto educators while potentially undermining student-teacher trust and damaging educational experiences.

More broadly, in assessment contexts, students' ability to communicate their knowledge clearly, making expression and grammar central to educational outcomes and linked to children's rights to education (Article 28) and freedom of expression (Article 13). While Grammarly can support clarity, its GenAI features may also distort meaning or tone, potentially misrepresenting students in their own work. These risks highlight the need for more research on how GenAI-enabled features affect students' learning and assessment experiences. Overall, both the opportunities and challenges of using

[98] Ranalli, J., & Yamashita, T. (2022).
[99] Katsarou et al. (2025).
[100] See Huang et al. (2020).
[101] Nazari et al. (2021).
[102] Ranalli (2021). Children's willingness to use and trust AI-EdTech can be affected by several factors (Atabey et al., 2025a).
[103] Godwin-Jones (2022).
[104] Abu Qub'a et al. (2024).
[105] See, for example, Mollick (2024); Scarfe et al. (2024).

Grammarly can impact students' rights; in particular, freedom of expression (article 13), education (Article 28) and non-discrimination (Article 2) can be particularly important to consider for learners with disabilities. Crucially, whether and how diverse groups of children can benefit from its use can depend on individual characteristics. Godwin-Jones highlights the importance of tracing 'individual case histories to illuminate what factors might be contributing to success or failure in working with AI writing tools'.[106]

Available independent research-based evidence mainly focuses on university students and the potential added value (if any) that GenAI features bring to children's learning experiences, which is different from existing Grammarly functions such as AWCF, and remains to be thoroughly explored. Overall, there is a lack of evidence regarding children's use of Grammarly or the impact of their teachers' or institutions' use of Grammarly features on their school lives in the UK. Another important area of research involves exploring the experiences and perspectives of diverse groups of children, considering how various factors such as age, gender and neurodiversity influence their experiences.

Privacy and protection from commercial exploitation

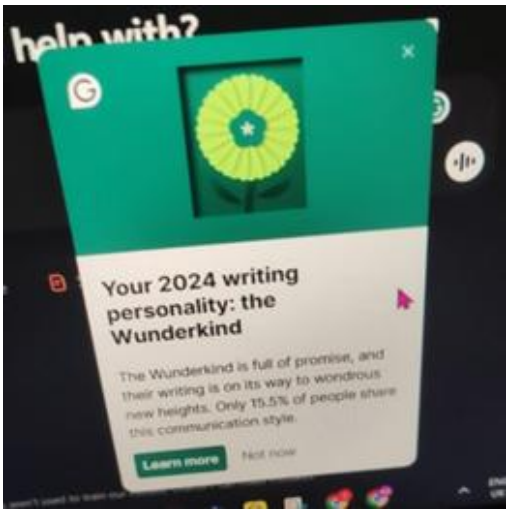
Using *Ghostery WhoTracks.Me*, we examined the tracking that takes place online for a child user account using these GenAI tools.[107] Figure 1 indicates that Grammarly displayed an advertisement to a child user while they were using ChatGPT, nudging them to use Grammarly despite the user not consenting to website tracking. Tracking browsing activity requires explicit consent and can be disabled in settings.[108] In this case, the user had opted out (in our product walkthrough). Yet, the browser activity did not reflect their choice (see screenshot, Figure 1), undermining their agency, and privacy and data protection rights.

Figure 1 shows a screenshot of a pop-up notification on the ChatGPT website, viewed in Google Chrome on a Microsoft ThinkPad Yoga laptop, in the UK (December 2024). This inconsistency suggests that Grammarly's data practices are not aligned with its own privacy commitments. We also note that design decisions such as colour used may impact children's decision making (e.g., green click on 'Learn more' while 'Not now' has a white background; see Figure 1). In the context of data protection law, such information

[106] Godwin-Jones (2022, p.15).
[107] For Ghostery's scope for capturing tracking activities and its limitations, see methods section and Ghostery (2025a, b).
[108] During the walkthrough, we created a student account with Grammarly and disabled all GenAI features and optional tracking in Chrome. Still, a pop-up notification from Grammarly appeared on the ChatGPT website, contradicting the company's stated compliance with data protection principles such as data minimisation and purpose limitation.

delivery choices in, for example, cookie policies are considered unfair and not aligned with children's best interests.

Figure 1: Grammarly advert on ChatGPT *(Browser: Chrome, Software on PC: Microsoft Education, PC: Yoga X1 ThinkPad)*

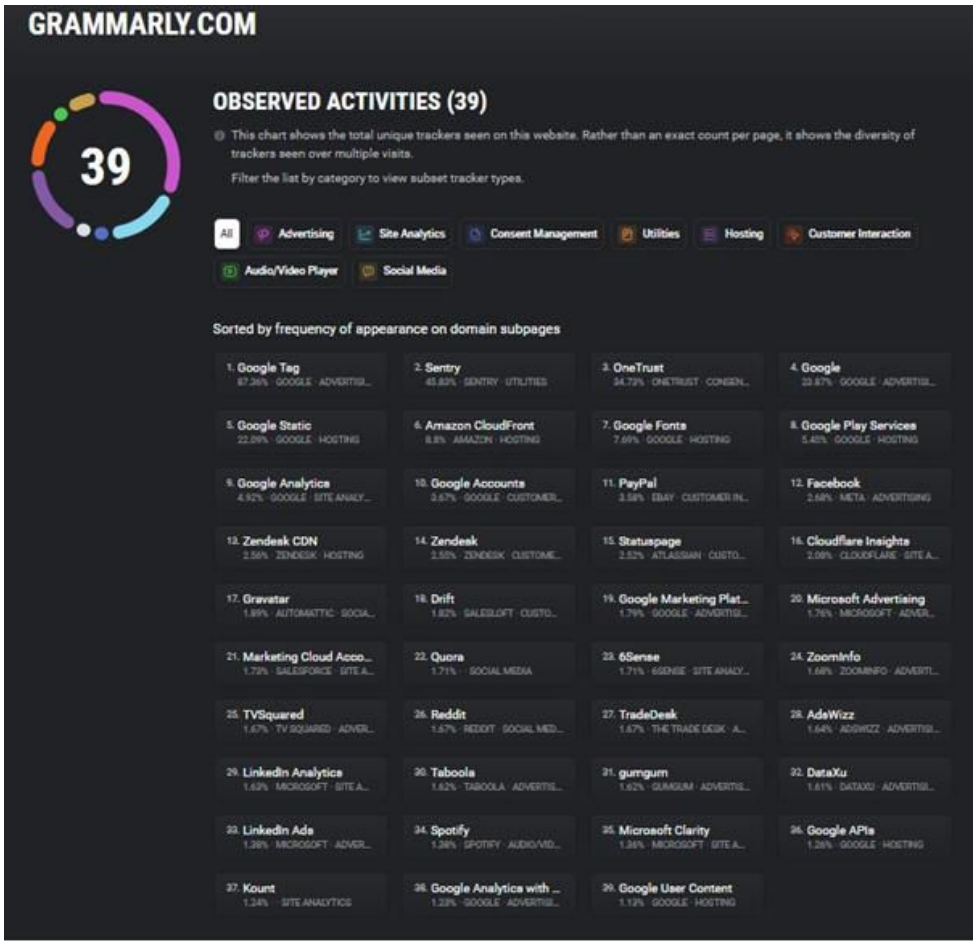


We found that child users who chose not to use the Authorship or GenAI features and opt out of data and cookies (non-essential) of Grammarly still face commercial tracking and data processing, which undermines user choices in settings and cookie preferences, in violation of children's rights to privacy and data protection.

In this way, Grammarly unfairly benefits by processing children's data to drive engagement even when users have opted out of Authorship and browser tracking features (AADC Standards 1, 6, 7, 12).[109] This practice undermines children's rights to privacy and protection from commercial exploitation. It contradicts the company's own privacy policy, which promises not to use student data from education accounts for commercial purposes (e.g., Google Marketing Platform, LinkedIn Analytics, LinkedIn Ads, Google Analytics, Facebook and Microsoft Advertising, among many others) (see Figure 2). Our walkthrough revealed extensive commercial tracking: Figure 2 shows only the first layer visible through Ghostery, but clicking on any tracker exposes a wider chain of tracking practices. The full scope of this tracking, including where children's data or digital footprint tracks end up, remains opaque and concerning.

[109] For AADC Standards, see ICO (2021).

Figure 2: Observed activities and commercial tracking (child user, Grammarly Education on Chrome browser)



Regarding safety (Article 19), our Grammarly walkthrough showed that when a child user asked the Grammarly GenAI chat tool about dark thoughts and the need for urgent help, it provided appropriate information and UK-relevant emergency numbers and advised the child to speak to a trusted adult. This is arguably a good-practice example in the context of children's safety and right to awareness of their rights, access to health services and access to information (unlike the MagicSchool AI case study). Yet, it is unclear whether Grammarly notifies the parents or teachers, or the school or university, about the content of such chats, and whether the child user is informed if such communication occurs.

We identified several commercially exploitative data practices (Articles 32 and 36) in Grammarly that undermine children's agency, best interests (Article 3), privacy (Article 16), and protection from exploitation (Articles 32 and 36). A key concern is its AI

detection tool,[110] built into the new AI Authorship feature. Despite acknowledging the inaccuracy and risk of false positives in AI detection, Grammarly continues to market it as a reliable way to ensure authenticity.[111] This places an unfair burden on teachers, risks damaging student-teacher relationships and undermines trust, which directly conflicts with educational aims (Articles 28 and 29). Inaccurate flags risk negatively impacting students' grades and educational experiences. By prioritising its own commercial interests over children's rights (Article 3), Grammarly arguably gains an unfair advantage while offering students no real benefit.

Another troubling practice is the use of children's data outside of the EU and UK for training and service improvement. According to our walkthroughs, a migrant child who created a Grammarly account in Türkiye in December 2024[112] and later moved to the UK in January 2025, would, by default, continue to have their personal data used for Grammarly's commercial purposes unless they manually disable this setting. This design means that children's privacy (Article 16) and protection from commercial exploitation (Articles 32) depend on where their account was first created, leading to the unequal enjoyment of rights and potential discrimination (Article 2).

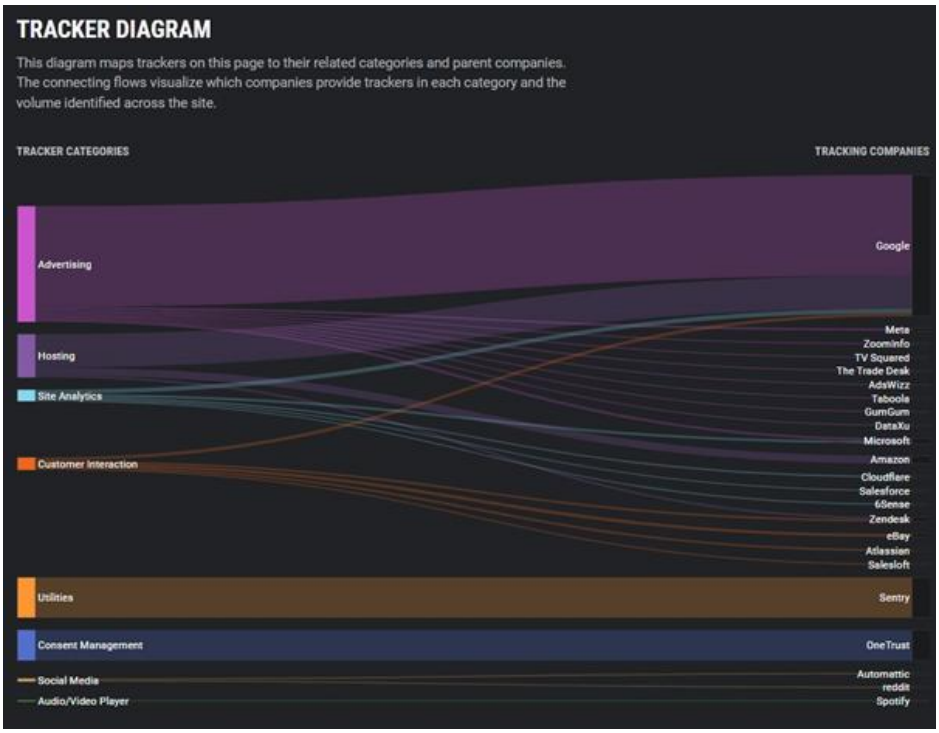
Grammarly also claims to promote accessibility and inclusion, but the impact on children with disabilities (Article 23) is mixed. While it can support learning in some cases, it may also disadvantage vulnerable users. For instance, a 14-year-old with dyslexia and ADHD might use the free version to check grammar, unknowingly enabling GenAI features and Turnitin integration that share data with third parties. Their essay could then be flagged for AI use, resulting in accusations of cheating despite their intention only to correct grammar. Such scenarios illustrate how neurodiverse learners risk being unfairly penalised.[113]

Finally, Grammarly fails to provide children with meaningful remedies or ways to exercise their rights. We found no child-friendly complaint mechanisms, accessible

[110] See Tang (2024).
[111] See Grammarly (2025c). A UK study found that 100 per cent of GenAI-written exam submissions were virtually undetectable and outperformed real student submissions (CQSD, 2025; Scarfe et al., 2024). Similarly, an MIT study showed that AI detection tools do not work and should not be used by educators. See Mollick (2024); Robertson (2025).
[112] In Türkiye, the Turkish Data Protection law applies (The Turkish Data Protection Authority (KVK), 2025). The core data protection principles under Article 5(1) (among many other requirements) are the same with the UK GDPR. This means, for example, that Grammarly must process children's personal data fairly, lawfully and transparently in both countries, which we found is not the case. Türkiye and the UK are signatories of the Council of Europe's (2018) Convention 108 – for its relevance to children's personal data protection in educational settings, see Persson (2019), Council of Europe (2021).
[113] In some circumstances, the decisions made by other stakeholders using Grammarly or tools such as Turnitin (e.g., educators or schools) can impact Articles 28 and 29. For example, the decision a teacher takes about a child's exam grade or academic integrity after seeing Grammarly marketing about how Grammarly can help detect AI-generated content, and the teacher trusting in the tool, impacts not only the grade of the student, but also the trust and relationship between the child and the teacher. Here, the decisions made by the teacher due to the company's marketing claims can indirectly but still significantly affect children's educational experiences in a school environment.

privacy notices, or tools to contest decisions (e.g., wrongful AI-use accusations). This gap undermines children's rights to privacy (Article 16), to be heard (Article 12), to access information (Article 17), and to seek remedies (Articles 40–42). The AADC's Standard 15 requires accessible tools for reporting concerns and exercising rights, yet Grammarly does not meet this requirement.

Figure 3: Diagram showing Grammarly uses commercial tracking.[114]



Complex, non-child-friendly consent and information, as well as default GenAI settings, increase the risk of misunderstandings. For students with attention or reading difficulties, this can cause unfair treatment, stress and reduced trust in such tools, turning intended support into a barrier. Finally, it is unclear whether or how the company practices enable children to know about their rights as well as relevant remedies, or indeed, if there are child-friendly forms of support, reporting, remedies and access to complaint and justice mechanisms.

In summary, while Grammarly can support children's learning and expression, particularly for students with additional needs (e.g., dyslexia) and non-native or second-language English learners, its data processing, design choices, and marketing practices raise concerns for children's rights. In particular, its use of advertising and tracking, and

[114] This tracking is for purposes such as advertising, despite promising the opposite in its policies for paid and education accounts.

its promotion of unreliable AI and plagiarism detection tools, are not aligned with the best interests of the child (Article 3), nor with children's rights to privacy (Article 16) and protection from commercial exploitation (Article 32). Despite its claims of inclusivity and responsible AI, there is still a lack of independent, child-centred evidence on how Grammarly's GenAI features are used in schools, and how children of different ages and abilities experience them in practice.

MagicSchool AI

MagicSchool AI is a GenAI platform that offers services to schools, teachers and students.[115] Teachers and students use these tools for a variety of purposes to automate common teaching and learning tasks. It was initially designed to address teacher burnout and help with lesson planning, creating assessments/quizzes, writing support and creating classroom materials. It has since expanded its features and targeted users to students, schools and districts.[116] The platform provides over 80 tools for teachers (MagicSchool AI for educators) and over 50 tools for students (MagicStudent).

Claims and realities in educational contexts

MagicSchool AI provides over 100 features and has many different uses, as expressed by the company:

> ***MagicSchool is built for educators, by educators, providing a genuine opportunity to reclaim valuable time for educators, combat burnout, and elevate the art of teaching.***[117]

It claims to support AI literacy, personalised learning, and reduce teacher workload. It also claims to be an evidence-based technology offered to schools, teachers and students in the UK.[118] It notes:

[115] MagicSchool AI (2025a). www.magicschool.ai
[116] BCV (2024); MagicSchool AI (2025a, b).
[117] MagicSchool AI (2025a, b). For teacher testimonials and community on MagicSchool AI website and social media platforms, see, for example, Common Sense Education (2025).
[118] 'ESSA Evidence Badges™ can be earned by any education solution and equip educators to quickly and easily understand a solution's existing evidence base. MagicSchool has earned the ESSA Badge IV, a certification that shows MagicSchool meets the evidence requirements of the US Every Student Succeeds Act (ESSA). The badge indicates that our product has been designed based on research and that the product team has conducted a qualitative study' (MagicSchool AI, 2025a). MagicSchool is currently being suggested for and used in the UK (e.g., Glow Scotland (2024b), also attracting investors' attention (LEK Consulting, 2025; BCV, 2024).

> ***We are the award-winning, most used, and most loved AI for educators in the world – now in nearly every US school district and in 160 countries around the world.***[119]

Students and teachers can use MagicSchool AI on a desktop browser, Chromebook, tablet or phone. It can be integrated into popular EdTech tools like Canva, Google Classroom and Microsoft Education.[120] A free version of the program is available, but a more advanced version with additional features is offered for a fee.

By placing AI in teachers' and students' hands, MagicSchool AI claims to help them use it productively and responsibly in their work. MagicSchool AI also claims to deliver personalised learning, provide 24/7 support and learning opportunities only possible with GenAI.[121] MagicSchool AI advertises itself as the 'most used and loved AI platform built for education in the world' and claims a measurable impact on student outcomes. Yet it does not provide evidence about the impact studies when making the claim about student outcomes and how this is measured.[122]

MagicSchool AI claims to help teachers save time and reduce their workload.[123] Some examples of use cases teachers reported as helpful include supporting course design, facilitating lesson planning, and generating ideas for course content in various classroom subjects – for example, using MagicSchool AI to enhance film literacy. Other use cases of MagicSchool.AI can be interactive, engaging country-specific and relevant content by combining textbook work with MagicSchool AI in course delivery.[124] The claims of the company are significantly relevant to Article 31and the child's right to leisure and play, with a focus on entertainment and creativity. Yet the product has design features and human-like outputs that trigger further engagement, making it difficult for children to disengage or take a break while using the tool.

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[119] MagicSchool AI (2025a).
[120] See also integration with other GenAI tools, for example, Anthropic (2024); MagicSchool AI (2025c).
[121] The company states: 'Nurture critical thinking -Leverage classroom AI to unlock learning opportunities only possible with generative AI (think: escape rooms, virtual field trips, and choose-your-own adventure stories) to promote critical thinking and drive student engagement.' See MagicSchool AI (2025d).
[122] The company claims 'Driving student outcomes through personalized learning – After adopting MagicSchool for Schools and Districts, Aurora Public Schools saw a 28% improvement in students meeting literacy grade level expectations. Our Writing Feedback, Language Learning Tutor, and the Translate It! tools played a key role in supporting students at varied academic and language proficiency levels within a single classroom' (www.magicschool.ai/case-studies/aurora-public-schools).
[123] See MagicSchool AI (2005a).
[124] Wereley et al. (2025).

Child rights audit in the context of education

MagicSchool AI is reported to be helpful for teachers to help create accessible content for children from diverse backgrounds and needs, including those with learning disabilities.[125] However, although the company makes big claims about accessibility and support for diverse learners through Universal Design for Learning (UDL), teachers report limitations of these tools. Children with disabilities often experience multiple, intersecting conditions (e.g., ADHD, dyslexia, depression, anxiety) that can compound challenges in both academic and social settings. Children with complex needs and vulnerabilities may be more susceptible to risks associated with human-like responses that aim to increase engagement with AI tools.

Children's learning may benefit from positive uses of MagicSchool AI such as accessing information about some historical events or famous authors and characters from novels to help in English literature classes or chatting with AI characters of influential historical figures for history classes. On the other hand, unhelpful information (e.g., in our walkthrough, the chatbot gave US helpline numbers to a UK child reporting bullying and suicidal thoughts) can undermine not only their access to information and learning experiences but also their wellbeing. This right is closely interlinked with other rights, and it depends on factors such as ensuring safety, age-appropriate content, and that children are not excluded from it once compliance with the laws upholding children's rights is ensured.

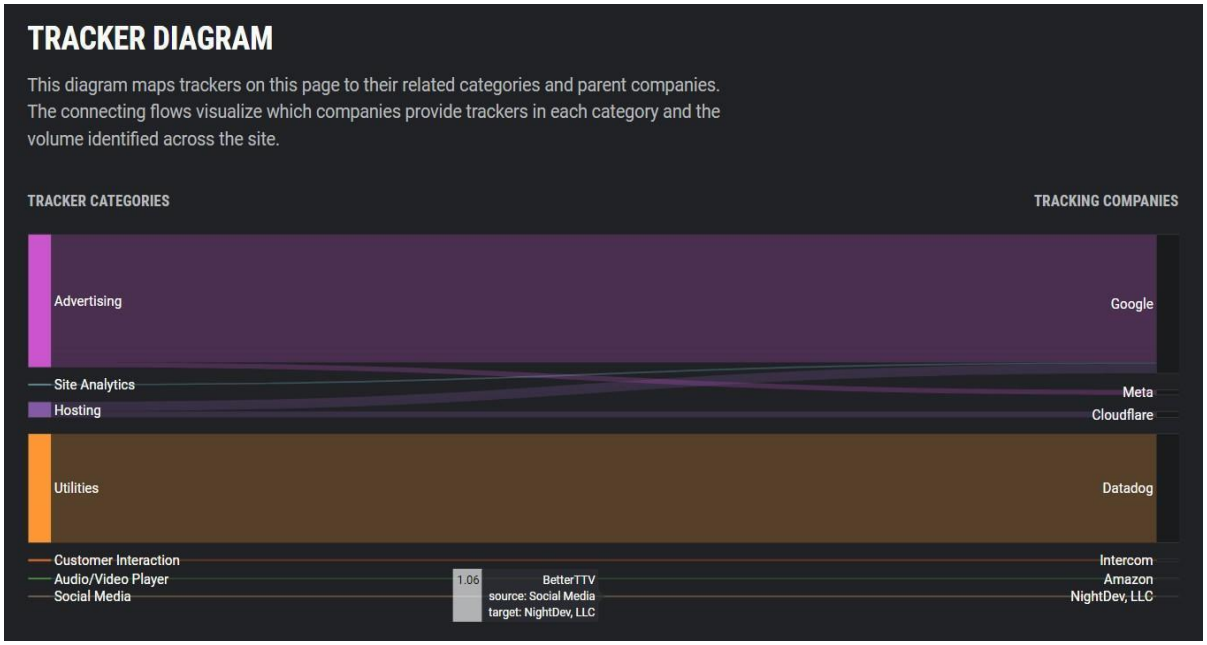
Although MagicSchool AI promotes its use of UDL as evidence of accessibility, it is unclear whether, and how, the company considers these intersecting vulnerabilities and the reasonable adjustments required under the Equality Act 2010. Nor is there much evidence about how these factors shape children's use of MagicSchool AI or its impact on learning. Anecdotal accounts (such as app store reviews and Reddit comments) highlight both benefits and harms, raising questions about the validity of the company's accessibility claims.[126]

[125] See Li et al. (2025); Lammert et al. (2024). Multiple factors including age must be considered to meet the needs of different groups of children. For use case examples from teachers, see Tilak et al. (2024, p. 67). A relevant example: *"One of the co-observers, the language arts teacher, felt that the lesson produced by MagicSchool did not facilitate gradual progression of difficulty level despite the tool being prompted to create middle school content on narrative and genre."*
[126] See MagicSchool AI (2025f). See also Lammert et al. (2024); Tilak et al. (2024); Li et al. (2025).

Privacy and protection from commercial exploitation

We found that MagicSchool AI's data practices can undermine rights to privacy and protection from commercial exploitation. The company presents itself as: 'Independently evaluated as the safest and most privacy-focused AI platform. Crucially, the default enabling of advertising and analytics cookies contradicts the company's own privacy policy. As a result, children are exposed to commercial tracking, including from adult advertisers such as erotic websites. Figure 4 was generated using Ghostery;[127] it illustrates this tracking by mapping the trackers present on the MagicSchool.AI website to their categories and parent companies, with connecting flows showing which companies operate in each category.

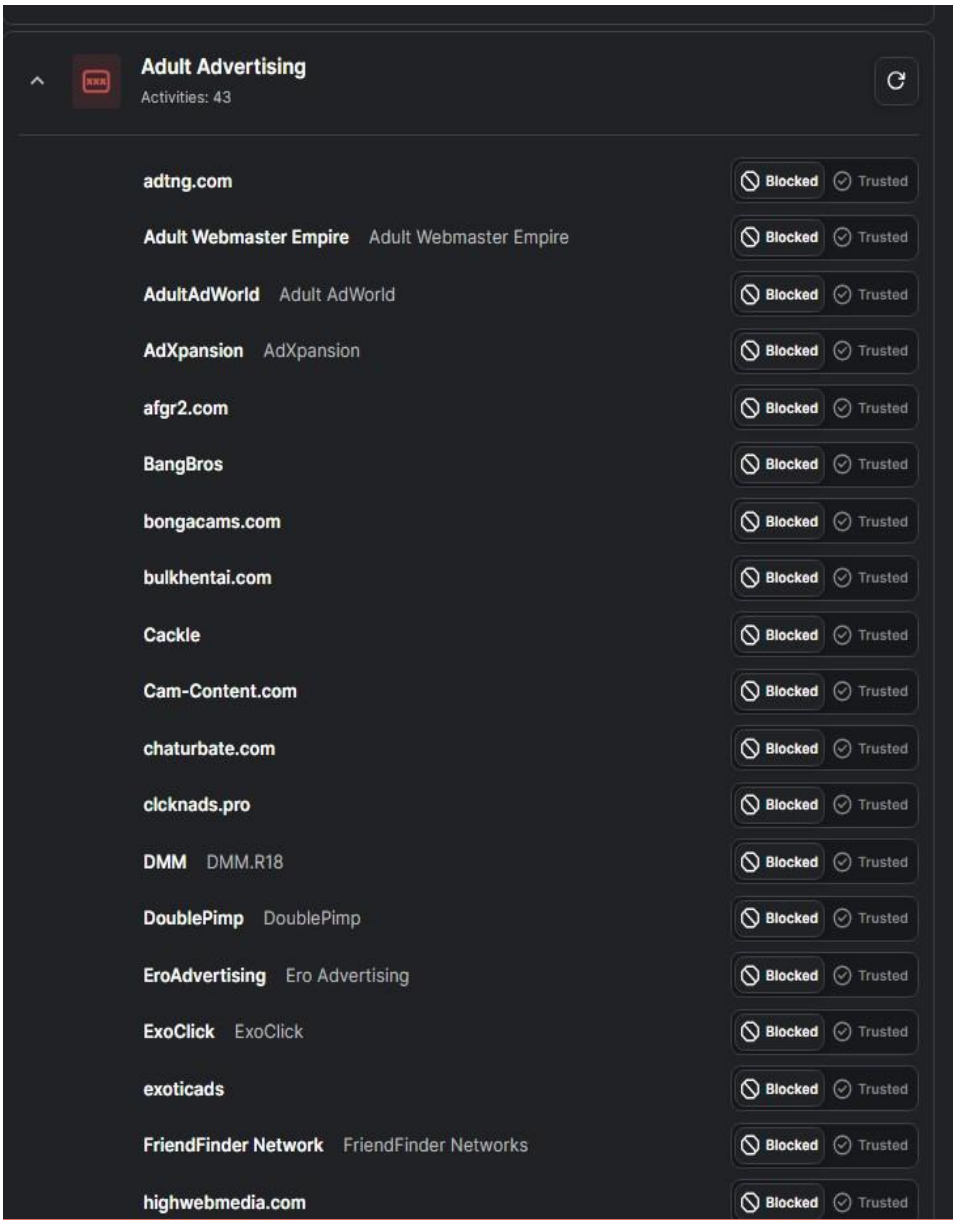
Figure 4: Tracker categories and tracking companies, using Ghostery.[128]



For example, when a teacher asks students to use MagicSchool AI, a child completing homework is automatically exposed to commercial tracking, without being given any choice, settings, or access to a privacy policy before joining via the teacher's link. Our February 2025 walkthrough with a 12-year-old MagicStudent account showed tracking by companies including Amazon, Intercom, and Google Ads.

[127] Ghostery (2025a, b).
[128] The tracking that takes place for a child user account (from our walkthrough) who visits MagicSchool AI.

Figure 5: An example of adult advertising commercial tracking using a Chrome browser.[129]



Ghostery reveals the network of tracking companies permitted by the MagicSchool AI website when a user visits, for example, to complete homework. By clicking on any single company in Ghostery, viewers can trace the extent of commercial tracking linked to that provider and see how it connects to other listed companies (see Figures 5 and 6).

[129] Using Ghostery with Chrome browser on a Microsoft Lenovo Yoga X1 laptop in 2024 and 2025 in the UK with a student account (age 12) using MagicStudent for an assignment shared by MagicSchool AI Teacher account.

When we clicked on Intercom to trace its connections, we found that a child using a MagicStudent account on MagicSchool AI was being tracked by adult website advertisers, including erotic and 'friend finder' sites. Using children's data for such commercial purposes and monetising their interactions for profit, undermines their rights to privacy and protection from exploitation (Articles 16, 32–36).

Figure 6: An example of advertising commercial tracking when a student (age 12) uses a Chrome browser.

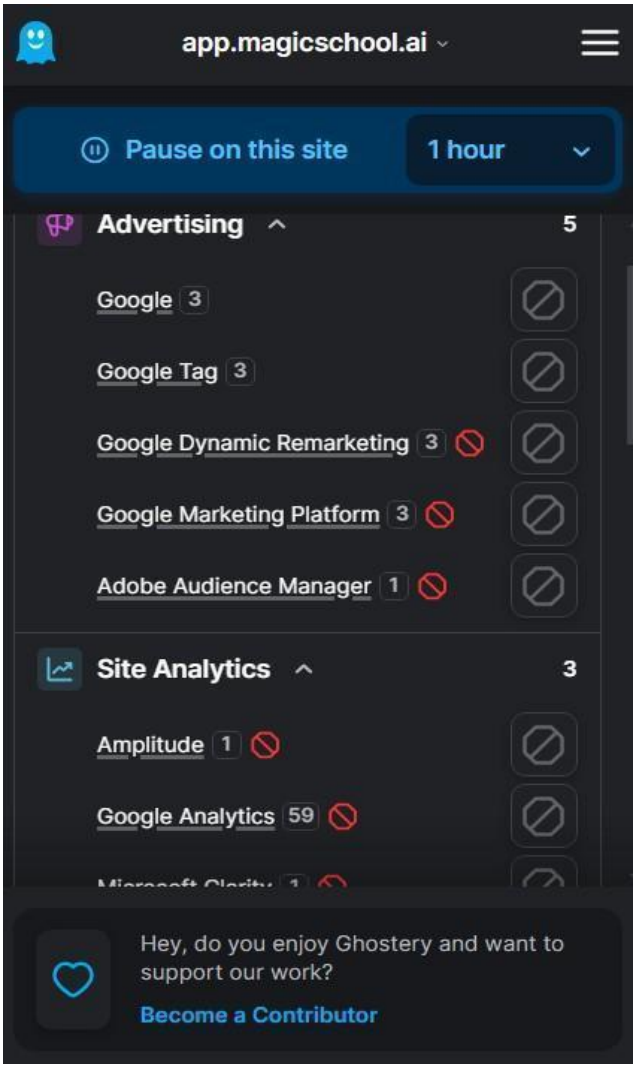
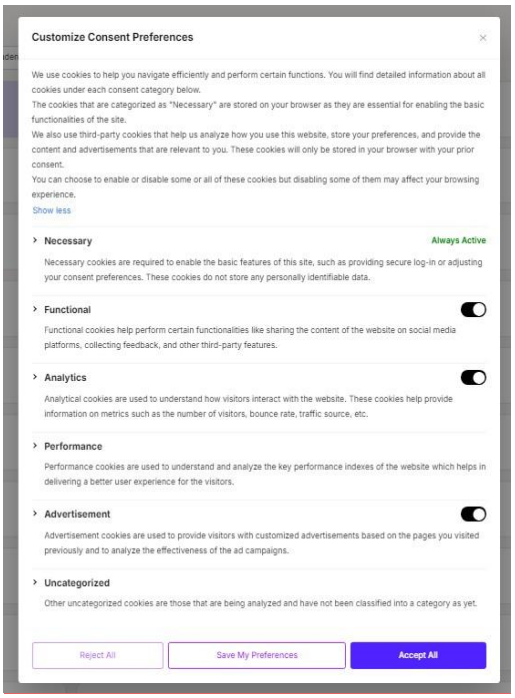


Figure 7: MagicSchool AI shows a child user consent screen (the purple box suggests 'Accept all', contra data protection regulation).



Notwithstanding the claim to have a adopted rigorous technical, administrative, and physical information security measures,[130] when we created an account on MagicSchool as a 12-year-old, we found that all cookies, including those for advertising and analytics, were enabled by default, and that the company uses interface design and colours unfairly in a way that can trigger the child user to 'Accept all' (see Figure 7). Such practices are not in the best interest of the child and do not provide the highest standards of privacy (against Articles 5 and 25 of the UK GDPR).

Additionally, we did product walkthroughs creating profiles for students of different ages. For example, we did a walkthrough as a Year 2 student using the MagicSchool AI student support chatbot. In February 2025, the chatbot told a MagicStudent account user that their conversations were 'private' even though its policies grant schools access to these chats – encouraging further engagement under false assurances. This may lead children to share personal data or information they otherwise might not want to share, or if they knew the chat can be accessed all the time by their teachers, they might prefer

[130] MagicSchool AI (2025e) notes that it is 'Independently evaluated as the best for safety and privacy – We are committed to adhering to the requirements and responsibilities under key legislations such as the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy and Protection Act (COPPA), SOC 2, General Data Protection Regulation (GDPR), and relevant state student data privacy laws. We are also a 1EdTech Certified Data Privacy App, reinforcing our credibility as a trusted EdTech solution. MagicSchool received a 93% privacy rating, placing us at the top of AI tools for schools in Common Sense Media's independent privacy evaluations. We share in Common Sense's mission to create coordinated effort to protect child and student privacy and build in safety and security from the start.'

not to input in the same way, which risks undermining their agency and dignity due to potential oversharing.

In our walkthroughs in February and July 2025, the student support chatbot repeatedly failed to provide appropriate help to UK-based children. When posing as a child expressing suicidal thoughts, the chatbot gave only US emergency contacts, and later refused to engage until prompted several times, providing UK numbers only after being corrected by the child. Similarly, when a child disclosed bullying and suicidal thoughts, no meaningful support was offered. In another test, a Year 2 student who asked about their rights received no response, leaving children without crucial rights-based information.

The lack of safeguarding alerts compounds these failures. Teachers are not notified when a child raises urgent concerns; instead, they must manually review content summaries, a process that requires extra effort and does not ensure timely intervention. As a result, children may be left unsupported in moments of crisis.

Such practices undermine children's rights to information (Article 17), health and safety (Articles 19, 24), life and development (Article 6), and privacy and protection from exploitation (Articles 16, 32). While MagicSchool AI promotes itself as advancing AI literacy and learning, there is no independent research evaluating its educational impact in UK schools, raising further concerns about its reliability and appropriateness in educational settings.

Information is needed for a comprehensive audit to ensure that children are aware of their rights (Article 42) and remedies. We found that children are not informed about their rights or potential remedies when their right to privacy is breached, undermining their data subject rights under the UK GDPR. When a child user disclosed being bullied at school and having suicidal thoughts, the chatbot provided no meaningful support, this also impeding children's pursuit of remedy or protection.

MagicSchool AI presents itself as a widely used, teacher-designed platform that reduces workload, supports lesson planning, and offers personalised learning, but its claims of educational impact remain largely unsupported by independent evidence. While the tool can provide creative and accessible classroom resources, its design features raise concerns about over-engagement and insufficient accommodation for children with complex needs. Most seriously, the platform's default data tracking, misleading privacy assurances, and inadequate safeguarding responses expose children to risks of commercial exploitation (Article 32), privacy violations (Article 16), and a lack of protection and support (Article 19) in moments of crisis.

Microsoft Copilot

Copilot is a GenAI tool embedded in Microsoft 365 applications (e.g., Word, Teams) and claims to improve productivity and creativity.[131] Microsoft for Education is one of the most used EdTech in schools in the UK. Although Copilot is officially available only to users aged 18 and over, evidence shows that children use it in educational settings inside and outside the classroom,[132] but there is no official policy or publicly available data on its adoption more widely across UK schools.

Claims and realities in educational contexts

Microsoft claims that Copilot improves writing efficiency, supports creative tasks and streamlines educational workflows. It is marketed as a tool that can reduce workload by automating routine tasks while enhancing learning through AI-facilitated suggestions. In the UK, Copilot is used to support student expression and provide accessible, informative content to help students learn, access educational content and think critically about such content. Microsoft 365 is already ubiquitous in schools in the UK; when enabled by the user, Copilot is integrated within Word, PowerPoint, and Teams. UK policy documents acknowledge that GenAI is already being used 'across most subjects' and urge schools to set clear policies for when/how GenAI is appropriate, including for homework purposes.[133]

The tool is both student- and teacher-facing. Students can use it for brainstorming essay ideas, simplifying dense readings into plain-language summaries, making revision questions/flashcards, translating/rephrasing to fit a reading level, outlining presentations in PowerPoint and extracting key points from long documents or Teams transcripts. These uses can help pupils with executive-function challenges structure work and help EAL learners with readability. Meanwhile, teachers use it for drafting lesson outlines, rubrics, model answers, producing worksheets, summarising meetings, writing parent communications, generating tasks to support mixed-attainment classes and tailoring content of materials to diverse learners. In several studies, teachers reported time savings on administrative tasks.[134]

While Copilot can be useful in helping with learning activities, especially when a teacher mediates its use, the literature warns that embedding AI into everyday tools creates

[131] See Microsoft (2025b).
[132] Alan Turing Institute (2025a, b); Children's Parliament et al. (2025); DfE (2025a); LGA (2025); SQA (2025).
[133] DfE (2025a); SQA (2025).
[134] See, for example, Ramos et al. (2024). For other relevant Copilot use cases (although not education context-specific), see UK Government Digital Service (2025). Microsoft includes testimonials from teachers and schools on its website, and Copilot use examples and claimed benefits for teachers and students (see Microsoft, 21 October 2024; 12 May 2025).

risks such as normalising dependency and providing inaccurate information. Therefore, attention should be paid to pedagogy, policies and safeguards to ensure it enhances students' educational experiences, not hinders them. Studies report that educators and students are concerned about the unreliability of AI-generated information,[135] the emotional labour involved in constantly checking and correcting mistakes,[136] questioning whether they should be adopted in classrooms in the first place. Such experiences can undermine children's rights to access information (Article 17) and education (Article 28).

A 2025 study on AI-enhanced feedback found that while such tools can make comment preparation more efficient for educators, human verification remains essential to prevent errors. Luo highlights that GenAI in assessment can erode trust: students fear being wrongly accused of cheating. At the same time, teachers worry about undetected AI use, creating stress on both sides and weakening pedagogy unless clear and fair policies are in place.[137] Similarly, a systematic review by Zhai et al. shows that overreliance on AI dialogue systems is linked to reduced critical thinking and analytical depth, with hallucinations and bias, undermining learning if not carefully managed.[138]

Child rights audit in the context of education

Copilot claims to support accessibility and learners with diverse needs. A study by Adnin and Das with 19 blind and visually impaired individuals found that GenAI tools, including Copilot, can assist with tasks such as content creation, image descriptions, editing, alt-text and restructuring.[139] However, their study revealed that accessibility barriers persisted, as outputs were often inaccurate or generated in inaccessible formats, necessitating constant verification and presenting challenges for visually impaired users. In schools, such shortcomings mean that potential accessibility benefits may be undermined by inconsistent results or poor integration with assistive technologies.

More broadly, reviews of LLM-based tools in education highlight their promise for personalised support, such as simplified explanations, multiple examples, and practice questions. They also stress two key risks: the lack of child-specific evidence on outcomes and the danger that poorly scaffolded use could displace core skills practice.[140] When used intentionally, Copilot's summarisation, translation, format-shifting and explanation tools can help pupils access content at an appropriate level,

[135] See DfE (2025a).
[136] BRAID (2024); Robertson (2025).
[137] Luo (2025).
[138] Zhai et al. (2024).
[139] Adnin & Das (2024).
[140] Holmes et al. (2022); Sharma (2025).

particularly students learning English as an additional language learners and those with learning differences or visual impairments. For instance, GenAI can generate or correct alt-text to aid participation, though inaccuracies still require additional vigilance. Microsoft has published screen-reader tips and tutorials for Copilot, showing some attention to accessibility, but meaningful benefits in education remain dependent on output quality, teacher mediation and appropriate safeguards.

When we began this research, Microsoft stated publicly that Copilot was intended for users aged 18 and above, signalling an apparent boundary between adult and child users. However, in May 2025, the company announced that Copilot would become available to users aged 13 and above. This shift raised important questions.[141] The user age change proceeded without a published child rights impact assessment (CRIA) or documentation of child participation. Given SURF[142] data protection impact assessment (DPIA) high-risk findings,[143] deploying Copilot to minors without child-focused safeguards cannot be assumed to be in the best interests of children, particularly where opt-ins or even opt-outs are not an option.

Privacy and protection from commercial exploitation

In 2024, the Data Protection Authority in the Netherlands advised schools and educational institutions to stop using Microsoft 365 Copilot due to privacy concerns.[144] A DPIA revealed data protection risks associated with Copilot, including fabricated personal data, opaque filtering decisions, unclear retention of AI-generated content and extensive telemetry/logging.

Earlier complaints also found Microsoft collected data without consent and used it for commercial purposes. These practices undermine core data protection principles of transparency and fairness under the UK GDPR, which underpin the AADC and are arguably incompatible with children's rights to privacy, agency and protection from commercial exploitation (Articles 16 and 32). The DPIA did not include a risk assessment related to children's use of Copilot, noting ‘Microsoft does not make this paid service

[141] What factors informed the lowering of the age threshold? What consultation, if any, took place with respect to the implications for children? And what measures have been introduced to address the risks associated with bringing GenAI into educational contexts where participation in digital systems is often compulsory, and where, within Microsoft, parents and children can raise concerns they may have and access remedies?
[142] “SURF is the IT cooperative of education and research.” SURF (2025). https://www.surf.nl/en
[143] See SURF (2024b).
[144] SURF (2024a, b).

available to users under 18 years'.[145] However, we note that children in the UK are already using Copilot, which is not yet officially available in schools.[146]

In 2024, NYOB (European Centre for Digital Rights) reported a complaint against using Microsoft 365 in schools. It was found that consent wasn't obtained, and data collected from children were used for commercial purposes such as advertising and product improvement (commercial exploitation, Article 32).[147] We also found tracking for commercial purposes (see Figures 8 and 9). In Copilot, Microsoft doesn't seem to 'sell' data for advertising purposes or use data to train its models. However, arguably, there are different types of commercially exploitative data practices, such as causing students to lose time and concentration by using account data for unsolicited emails from Microsoft, tracking students' every activity, not only educational but at home and school, and using data for its commercial benefit.

Copilot's default integration into Microsoft 365 such as Word and Teams further limits children's ability to opt in or out. Although already rolled out in UK higher education students and staff are not given an option to opt out. In a school context, this can translate into pupils encountering Copilot without choosing to, undermining their agency unless schools offer alternatives. Recent work shows adversarial prompts can elicit systematic hallucinations across models. Students may accept text that sounds right but is wrong, which can negatively impact knowledge formation and learning. For UK schools, these findings should prompt local DPIA's and further assessment under data protection law and the AADC before adoption. DfE guidance expects institutions, not pupils, to set the rules, while Ofcom requires children's risk assessments by services likely to be accessed by children.[148]

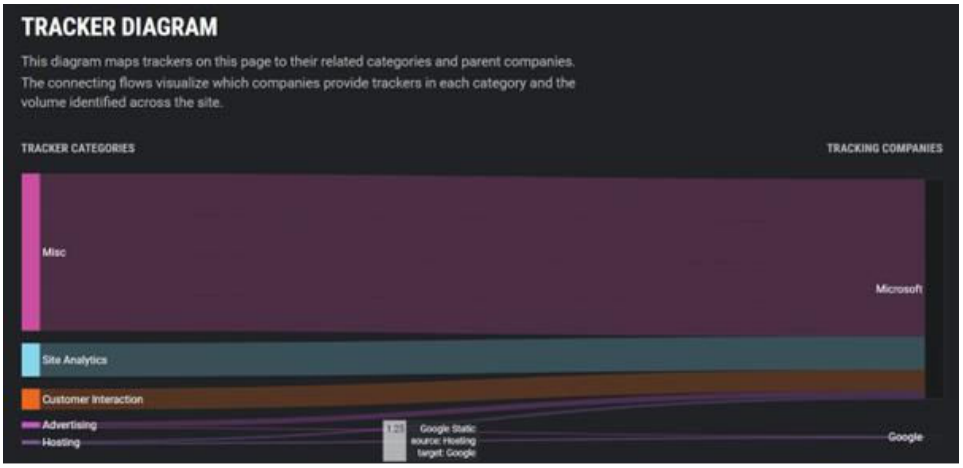
Children's privacy and agency concerns with Copilot need urgent attention. For example, when Microsoft 365 Copilot's safety filters block a response deemed high-risk, Copilot typically replies 'I can't answer,' without explaining that a filter was applied or why. To students, this appears as if their request simply failed or the AI is being unhelpful, masking the fact that hidden rules are overriding the exchange. Schools have the possibility to adjust these filters; at best, they can submit a support ticket if they think the filtering is too strict.

[145] See SURF (2024a, b). See also ICO (n.d.).
[146] See DfE (2024c, d).
[147] See NYOB (2024).
[148] See DfE (2025a).

The SURF DPIA of Copilot found this design to be unfair under GDPR Article 5(1)(a),[149] which is inconsistent with the AADC's first standard on the best interest of the child. The issue is not bias in the response or undisclosed data processing, but the lack of transparency as children are not informed when a filter blocks an answer. In effect, the system is steering the conversation without disclosing that it is doing so or on what basis. This concealment creates an illusion of control, undermining children's agency and right to information (Article 17).

Default enablement plus opaque data flows risk conferring commercial advantage without explicit, meaningful consent from children or parents. Where telemetry and content processing are poorly explained – or can't be declined – children's data become part of the product's value chain and can amount to commercial exploitation (Articles 32 and 36). Figure 8 is a tracker diagram that shows commercial tracking when a child user visits the Copilot website.[150]

Figure 8: Ghostery screenshot of advertising commercial tracking that takes place on a Chrome browser *(e.g., Google advertising)*



Ensuring children's right to privacy is crucial, as infringements can directly affect their educational experiences in schools. Compliance with data protection law is therefore essential, not only to safeguard privacy itself but also to protect broader aspects of children's daily lives, such as their relationships with teachers, their trust in school, fair treatment in assessments, and collaboration with peers.

SURF documents high risks associated with logging, content processing, and the potential fabrication of personal data in the DPIA. What is lacking is a UK-specific DPIA, child-facing information and privacy protections adequate for routine use in school.

[149] SURF (2024b)
[150] Our walkthrough on Copilot using Ghostery to observe tracking activities was in December 2024 and February 2025.

Figure 9: An example of observed activities on a Chrome browser using Ghostery

Regarding freedom of expression (Article 13) and the right to play (Article 31), Copilot can help students express their ideas through brainstorming and structuring ideas, particularly for those with writer's block. Systematic reviews find that students report confidence gains when AI helps them organise their ideas, provided they engage critically with the AI and revise. Studies on AI-supported feedback and planning suggest time savings that can be used in pastoral care and traditional methods in classrooms.[151] But if used uncritically, it can homogenise style and voice, leading to generic prose.

Copilot can improve access and free time for teachers, but overreliance on using the tool risks core skills such as critical reading/writing. Reviews stress the need for assessment redesign and AI literacy to preserve the aims of education.[152] For instance, under Article 29, education should also foster respect for the natural environment. Studies show that children are concerned about the environmental impact of GenAI tools and want to make informed choices about their use in educational settings.[153]

[151] Robertson (2025).
[152] See DfE (2025a); Holmes et al. (2022); Robertson (2025); Zhai et al. (2024).
[153] Alan Turing Institute (2025a, b); BRAID (2024).

Children's right to education and goals of education (Articles 28 and 29) are linked to the decision to be children's strong interest in environmental impact means they want to make informed choices about the digital tools they use, especially if those tools have uncertain and not well-evidenced educational benefits.

Access to information (Article 17) and remedies (Articles 40 and 41) and knowledge about rights (Article 42) are crucial for the right to privacy. Relatedly, the AADC sets out an online tool standard (Standard 15) that requires accessible tools that can help children report concerns and exercise their data protection rights. Microsoft offers no such tool.

Microsoft Copilot is being embedded in schools through Microsoft 365, offering potential benefits. Yet, its rollout raises significant child rights concerns: there is no child-specific evidence of educational impact, safeguards are weak, and opaque filtering and default data tracking undermine children's rights to information (Article 17), privacy (Article16) and agency. Without transparent safeguards, meaningful consent, and clear accountability, Copilot risks normalising dependence on AI and exposing children to exploitation, making its current deployment inconsistent with the best interests of the child (Art. 3).

Mind's Eye (Smartbox)

Mind's Eye[154] is a GenAI-driven art expression tool developed by Smartbox Assistive Technology Ltd. (Smartbox) (part of the CareTech Group[155]).[156] It is specifically designed for people with disabilities, including children who may have difficulty using conventional input methods like a keyboard or mouse. Delivered through Smartbox's Grid software,[157] it can be used on Windows or iPad devices and integrated with additional assistive features such as eye gaze, head trackers and Switch Access.[158]

Smartbox provides software and hardware to support individuals with various disabilities.[159] The company specialises in AT for adults and children with speech and mobility challenges, claims to offer technologies to enhance expression, communication

[154] https://minds-eye.app/home
[155] www.caretech-uk.com
[156] https://thinksmartbox.com/minds-eye
[157] For examples of uses in school and classroom contexts, see https://thinksmartbox.com/grid-for-schools/; https://thinksmartbox.com/grid-in-the-classroom/
[158] https://thinksmartbox.com/eye-gaze
[159] For example, cerebral palsy, autism, motor neurone disease (ALS), stroke and other cognitive or neurological conditions that affect communication and independence.

and accessibility.[160] The *Financial Times* cited Smartbox as the UK's most widely used assistive communication tool company.[161] Although the company has a significant presence in the health and education sectors in the UK,[162] there is no available evidence on how widely Mind's Eye is used in UK schools, nor on what percentage of Mind's Eye users are children.

Claims and realities in educational contexts

Mind's Eye aims to 'empower users to express their thoughts, feelings, and ideas visually.'[163] Children can use it to create AI-generated images from text prompts using DeepAI integration.[164] The company classifies the tool as an accessible app. It utilises a prebuilt vocabulary, allowing users to select from preset words or phrases to generate art, making it especially suitable for individuals with limited physical mobility or communication barriers, as well as those who struggle with typing or drawing.

The company markets Mind's Eye as 'the world's first AI art expression tool for people with disabilities.' In educational settings, it aims to assist children with diverse abilities in engaging with creative tasks both informally and formally. Mind's Eye seeks to eliminate or lessen barriers and support children's involvement in school activities and social life through AI, advanced eye tracking, and other access methods. Although there is limited research specific to children, previous studies with adults demonstrate some promising cases where users with disabilities can participate in creating digital art via GenAI.

Child rights audit in the context of education

Communication of ideas, thoughts and feelings plays a key role in education, particularly considering its value in learning, engagement[165] and self-identity development. Relatedly, *General comment No. 25* highlights:

[160] Smartbox integrates machine learning (ML) to supports integration of various access methods, including eye gaze, touch, switches and voice control, depending on user needs, with an aim to help users express themselves and interact with the world more easily. For example, its eye gaze technology uses specialised cameras that enable people with physical disabilities to control a computer using eye movements. See https://thinksmartbox.com/eye-gaze/
[161] 'Smartbox is the clear market leader in the UK, with approximately 50% of revenues generated through NHS funding. CareTech and Smartbox both support service users with learning disabilities, autism and acquired disability for example, through stroke or brain damage following an injury' (*Financial Times*, 2020).
[162] See, for example, Cambian Group (n.d.).
[163] Smartbox (2025). See also https://thinksmartbox.com/grid-for-schools/
[164] See https://deepai.org/machine-learning-model/children-book-generator; see also www.oneclub.org/awards/adcawards/-award/53592/minds-eye
[165] Peppler et al. (2022).

> ***For children in disadvantaged or vulnerable situations, technology-facilitated interaction with others who share their experiences can help them express themselves (para. 58).***

Art can be particularly effective in supporting children with disabilities, improving engagement, identity formation and agency. Playful artistic activities support expression and learning and are essential for children's rights to play and education. Indeed, a study conducted in Scotland found that children aged 13-17 with complex needs reported that Mind's Eye allowed them to express themselves in ways that: 'Reflected and expressed interests and aspirations, supporting creative engagement. Young people were able to play with ideas of who they are and how they're seen'.[166]

Mind's Eye's DeepAI includes predictive word suggestions to 'support expression'. These can enhance or hinder children's freedom of expression (Article 13). For the latter, an example is 'When a child was searching for an icon for "kick" (the ball), it consistently suggested only "kill" or "kiss", forcing ideas which were not wanted, and which dampened his enthusiasm.'[167] Unclear or inappropriate predictions or inaccurate outputs (see Figure 10) may frustrate users, interfere with engagement and limit children's motivation to express themselves in schools or at home. This undermines their right to express themselves and be protected from harm. Far from supporting expression, this may have implications for their rights to self-expression, education and wellbeing.

Article 23[168] provides the right of disabled children to enjoy a full and decent life, ensuring dignity, self-reliance and active participation in the community. It highlights that children should be cared for in a way that considers their disabilities, and that they should be taught at school in a way that understands their disabilities. Children shouldn't be treated unfairly (see Article 2) because of their disability or protected characteristics. This includes the use of GenAI tools with Mind's Eye enabling them to participate at home and at school.

Mind's Eye may present opportunities, particularly for children with disabilities who might otherwise be excluded from mainstream GenAI tools, which may be used for image generation, visual and artistic expression (e.g., DALL-E, Midjourney). By offering a

[166] BRAID (2024); see also Robertson (2025).
[167] BRAID (2024).
[168] *General comment No. 25* highlights the importance of inclusion by noting that: 'States parties should promote technological innovations that meet the requirements of children with different types of disabilities and ensure that digital products and services are designed for universal accessibility so that they can be used by all children without exception and without the need for adaptation. Children with disabilities should be involved in the design and delivery of policies, products and services that affect the realization of their rights in the digital environment' (para. 91).

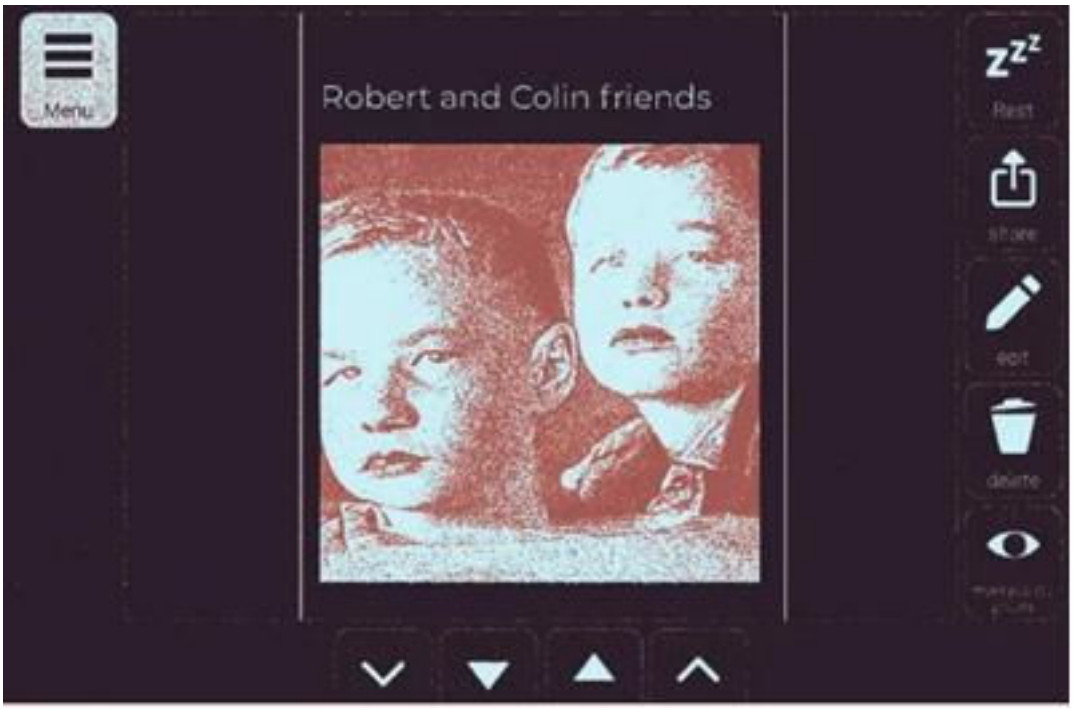
more accessible interface and connected access methods,[169] it can support broader participation for diverse groups of children, including those with disabilities (Article 23). The effectiveness of Mind's Eye depends on whether its outputs align with a child's input and intentions. If results are confusing or inaccurate, the experience may discourage children, particularly those already facing communication or accessibility barriers in their daily educational lives. Addressing these risks requires thoughtful design and evaluation, as well as research that centres children's views (Article 12), including whether generated images reflect what they want to express and how this affects their willingness to share and participate (Article 15).

Mind's Eye combines predictive text, eye gaze, and other access methods, potentially reducing barriers to creativity for children with disabilities. When effective, it can support their rights to free expression (Articles 13 and 23) and participation in education and play (Articles 28, 29, 31). However, the absence of accessible, age-appropriate privacy settings and data management tools raises concerns about privacy, non-discrimination, and protection from commercial exploitation (Articles 2, 16 and 32)

The representativeness and fairness of outputs also matter. Biased or inappropriate suggestions can distort children's meaning, reinforce exclusion, and undermine motivation to learn impacting children's rights to non-discrimination (Article 2) and disabilities (Article 23) in relation to education (Articles 28 and 29) and play (Article 31). Yet there is no public evidence or company policy on how Mind's Eye addresses bias, accuracy, or safe expression. Like other GenAI tools, including DALL-E and Midjourney, a significant gap in the development and evaluation of Mind's Eye is the absence of representative child user research, particularly regarding its impact on diverse groups of children. For these children, biased outputs are not just technical flaws but threats to inclusion and trust. Such impacts can lead to a reluctance to engage with the tool, limiting its effectiveness and reach. In an educational setting where motivation plays a key role, children's rights to education, play and non-discrimination may be undermined. Ensuring that AI literacy and creative tools like Mind's Eye prepare all children for the future requires not only reducing bias but enabling every child to exercise their rights equally, regardless of vulnerability.

[169] See https://thinksmartbox.com/access/#access-options

Figure 10: Output showing sad and white children as a response to a neutral prompt (showing lack of representation).[170]



Smartbox tools are reported to be helpful for individuals with disabilities, but carer or parental interventions are usually needed. Parental support can be particularly useful for children with limited physical or mental abilities (e.g., when these tools may not work as expected). For example, regarding the accuracy of eye gaze and tracking technologies, there is a need for research to understand children's views on the impact of these tools.[171] The company recognises the limits of these eye-tracking tools and that sometimes eye gaze can be inaccurate due to environmental factors. In such cases, when the only tool or medium available to teachers, parents and children is the very tool claiming to help with self-expression, any shortfall in accuracy can lead to harm and frustration experienced by the child.

Problematically, customer satisfaction rates are generally reported for educational organisations or adults who purchase these technologies for children's use. It is a challenge for children with complex needs to give feedback and tell whether the image Mind's Eye generated reflects what they wanted to express. Therefore, to what extent the company's claims about promoting self-expression and communication of thoughts

[170] Visual taken from BRAID (2024).
[171] Also note that the potential negative impact on children, especially if, for example, the eye-tracking technology results in inaccurate results and fails to support self-expression, can be far greater for those struggling to express themselves verbally and physically in their daily lives. See also Nerişanu & Cioca. (2024); Hutt et al. (2024).

(Articles 13 and 14) and sharing with other peers in and outside of the classroom (Article 15) can benefit from more research and indeed, children's own views and inputs (Article 12).

Privacy and protection from commercial exploitation

Children should be supported in communicating their preferences about data collection or expressing concerns. This is closely linked with access to information (Article 17) and remedies (Articles 40 and 41) and knowledge about rights (Article 42). Online tools for exercising individual rights and accessing personal data are unavailable or inaccessible to children (Articles 16 and 17). The AADC sets out an online tool standard (Standard 15) that requires the provision of accessible tools that can help children report concerns and exercise their data protection rights. Like other case studies, Mind's Eye fails to meet this standard because it doesn't offer any such tool.

For the right to privacy (Article 16), the company directs users to a general privacy policy (Smartbox, and its parent company, CareTech), which fails to meet data protection law in the UK. Some examples include sharing children's data with its group companies in the US and EU, but it does not specify why this data is shared or why it is necessary. Moreover, parents or children have no option but to refuse to consent to data sharing, which is unlikely to be in the children's best interests. Simply stating that a 'Joint Controller Agreement' allows data to flow across multiple jurisdictions does not meet UK GDPR requirements.

The AADC notes that Equality Laws and children's diverse needs should be considered when complying with standards. While Smartbox can show promise regarding accessibility, the company does not communicate privacy information in an accessible way: 'Privacy information not provided in accessible formats required under Equalities law' (Article 17, Access to information from the media and Article 23, Children with disability). Moreover, it is unclear whether different terms apply when Mind's Eye is used in schools operating under a Grid for Education licence are subject to additional privacy policies that don't share children's data with group companies for commercial purposes.[172]

Overall, Mind's Eye has the potential to empower children who may otherwise be unable to draw or speak to express themselves in education and digital art (compared to other image generation GenAI tools such as DALL-E or Copilot, which do not provide connected, accessible software and hardware). However, for this potential to be

[172] See Smartbox (2024).

realised, predictive tools need to be accurate, inclusive and transparent to ensure children's rights are respected in both design and use.

The educational impact is not only limited to the predictive tool and its content, but also how this may affect diverse groups of children. While the benefits of using of GenAI and its integrated assistive technologies and other EdTech tools can bring significant benefits to children with disabilities, they can put them at risk, exacerbating already existing inequalities in the education system and the future. We found no evidence that the tool helps children know and exercise their rights or facilitates access to relevant support or available remedies.

Child rights audit summary

Significant discrepancies exist between what companies claim to deliver and the availability of independent, research-based evidence supporting these claims, especially as regards the potential educational benefits. Further, inconsistent or biased outputs and the lack of age-appropriate design and child-friendly default settings can hinder positive learning outcomes and pose risks to children's rights. Indeed, the different case studies reveal noteworthy risks to children's rights to education, privacy, safety, non-discrimination, inclusion and expression, among others.

Table 3 provides a comparative summary of the child rights audit of the case studies. Some AI products, such as Grammarly or Mind's Eye, create opportunities for children's education. GenAI tools like Mind's Eye and Grammarly may support self-expression, including for children with disabilities, but they can hinder expression, for instance, through inappropriate autocorrection sentence tools, overly standardised feedback or potentially biased outputs. Similarly, AI character-based tools such as MagicSchool AI or chatting with Microsoft Copilot can help children's playful engagement. Yet, without careful design, these tools can blur the lines between support and manipulation.

Notably, the rights to privacy and protection from commercial exploitation are undermined in all case studies. None of the companies' data practices are fully aligned with the AADC standards or with Articles 5(1)(a) and 25 of the UK GDPR (see Annex I). Data protection violations affect not only children's privacy but also their education, wellbeing, safety and agency. The report also highlights the need for an intersectional approach that considers different age groups and vulnerabilities. Except for Smartbox, companies failed to do this despite claims about accessibility, inclusivity or age-appropriateness.

Children's perspectives were largely absent from the design, governance, deployment and evaluation of the tools studied, despite the right to be heard being fundamental to children's rights. Hearing from different cohorts (e.g., children in their early years or children with disabilities) is crucial for policymakers and product developers to anticipate and address the real-world impacts on children's rights. For example, Mind's Eye shows the potential of AI-powered assistive tech, yet failures in predictive modelling and a lack of participatory design limit its potential.

While the rights to education, play, expression and access to information may be enabled on occasion, the lack of a holistic child rights approach simultaneously undermines children's right to education in each case. Indeed, our audit raises urgent questions about whether including GenAI features in EdTech is necessary or wise.

Table 3. Child rights audit results snapshot

UNCRC (General comment No. 25 paras)	Character.AI	Grammarly	MagicSchool	Microsoft Copilot	Mind's Eye
Article 2, Non-discrimination (9-11)	⚠	⚠	⚠	⚠	⚠
Article 3, Best interests of the child (12-13)	✕	✕	✕	✕	?
Article 5, Evolving capacities (19-21)	?	?	?	?	?
Article 6, Life, survival and development (14-15)	⚠	?	⚠	?	?
Article 12, Views of the child (16-18)	?	?	?	?	?
Article 13, Freedom of expression (58-61)	⚠	☑	⚠	⚠	☑
Article 14, Freedom of thought (62-63)	?	?	?	?	?
Article 15, Freedom of association (64-66)	⚠	?	?	?	⚠
Article 16, Privacy (67-78)	✕	✕	✕	✕	✕
Article 17, Access to information (50-57)	⚠	?	⚠	?	?
Article 19, Safety (80-83)	✕	?	✕	?	?
Article 23, Children with disabilities (89-92)	⚠	?	?	?	☑
Article 24, Health (93-98)	✕	?	✕	?	?
Articles 28, 29, Education (99-105)	⚠	⚠	⚠	⚠	⚠
Article 31, Play (106-111)	⚠	⚠	⚠	?	☑
Articles 32, 36, Exploitation (40-2, 112-6)	✕	✕	✕	✕	✕
Articles 40, 41, Remedies (43-49)	✕	✕	✕	✕	✕
Article 42, Knowledge of rights (32-33)	✕	✕	✕	✕	✕

☑ Right clearly supported or realised.
⚠ Caution – potential to both support and undermine the right; enjoyment of the right is at risk.
✕ Right not realised or clearly infringed.
? Not enough evidence to reach a conclusion.

Looking ahead

This report explored real-world UK case studies to highlight critical and still unresolved questions: What does 'good' look like for the use of GenAI in education that respects children's rights? How close are current practices to realising that essential vision? Specifically, we took a child rights approach to 'auditing' five selected tools – Character.AI, Grammarly, MagicSchool AI, Microsoft Copilot and Mind's Eye – using exploratory and analytic methods. We found that GenAI in EdTech is, in many ways, failing to serve children's needs and best interests.

Many of the industry's claims of benefits are unsubstantiated or even contradicted by evidence. Evidence of educational benefits is especially scarce. None of the companies we reviewed published or made available policies that explain how they address age and developmental differences or children's vulnerabilities. Although many GenAI tools claim to be suitable for users aged 18 and above, they are still being used in educational settings (e.g., Copilot) without commitments to age-appropriate content provisions or other safety measures.

Assessing the impact on children's learning is not straightforward. On the one hand, children's educational experiences using these tools, the opportunities and risks they create and the benefits and harms that may result depend on the context, how the tools are used and children's particular needs and vulnerabilities, as we explored in the Mind's Eye case study. On the other hand, the rapid and often unannounced integration of AI features (including GenAI) into existing EdTech tools makes assessing their added educational value challenging. Moreover, while company claims are wide-ranging, public policy appears to frame educational benefit narrowly around curriculum delivery and assessment, neglecting self-directed, collaborative and creative learning.

This audit makes it clear that while GenAI tools offer new possibilities for learning and expression, they introduce serious and often unexamined risks to children's rights. In too many cases, their deployment is driven by market incentives or administrative convenience, not by clearly defined educational need or independent evidence of benefit. Independent research examining the impacts on children's learning and their wider educational experiences is greatly needed. Also needed is evidence about whether any of these companies take children's views into account on matters that affect them (e.g., data processing decisions, design features, reporting mechanisms). Equally urgent are policy efforts to mitigate the risks of opaque data practices, including tracking and marketing. After all, such tools are already in use at school and, compared with leisure uses, children have little or no opportunity to opt out. Further, the tools in our study rarely incorporated reporting mechanisms tailored for children.

The UK's devolved education system adds complexity to AI governance, which is already challenging to regulate between central and devolved governments.[173] Despite this complexity, some UK laws crucial for AI use in education, such as data protection, apply across all four nations. In contrast, others concerning educational provision, for instance, can differ in ways that impact children's rights. Although education is a devolved matter, and technological developments can change over time, the UNCRC and *General comment No. 25* remain, and all children deserve to enjoy their rights. Future research should examine whether different legal and policy frameworks within (and beyond) the UK impact children's rights in meaningful ways, and how fragmented approaches to AI-EdTech may impede effective evaluation of the potentially unequal consequences of its adoption.

Across the four UK nations, guidance assigns schools responsibility for legal compliance (the DfE, for example, highlights the need to comply with AI age limits). DfE guidance and policy documents offer only general principles without naming or assessing individual tools and detailed guidance is not yet available. For instance, the DfE asks schools to ensure children do not share personal information with GenAI, as if implementation were straightforward. It appears to say that children should opt in to sharing their data with AI tools and LLMs, though this is difficult to achieve. It remains unclear how children might obtain remedy or redress once data has been taken.

This leaves a burden on schools, teachers and students, which is compounded by companies that promote narratives about ethical use that tend to shift the burden onto teachers, schools and children. Rather than placing responsibility on schools to know what they are doing and to sort things out if anything goes wrong in relation to these hugely complex and opaque technologies, the findings of this report underscore the importance of a precautionary approach, in line with children's rights law. Further, companies should provide clear information about how they ensure children's rights in their data, design, development and business decisions, including these in their public transparency reports.

Public authorities should establish a strong child rights-respecting framework. They should provide an approved and regularly updated list of EdTech tools that meet clear evidence-based quality standards for pedagogy, data protection, accessibility and child safeguarding to support schools' and educators' decision making.[174] This would support compliance, transparency and accountability in the sector and help under-resourced schools procure confidently. Furthermore, data protection and child rights impact

[173] Roberts et al. (2023).
[174] See Atabey & Hooper (2024); Kucirkova et al. (2025); Livingstone et al. (2024d).

assessments should be in place before introducing, using, or deploying new tools or features on existing EdTech platforms, as the case studies in this report demonstrate.

Such considerations have prompted calls for stronger safeguards, including proposals for an EdTech code of practice.[175] Yet, despite these efforts, there is still no standardised framework to protect children's rights in the context of EdTech or GenAI use in and for learning across the UK. We recommend that the ICO should explicitly refer to children's rights in its upcoming EdTech code and provide guidance to EdTech companies and schools.[176] As GenAI becomes increasingly integrated into children's daily lives, it is necessary to examine the conditions of its introduction and to consider how children's agency, privacy and rights are being considered in decisions about design, use and deployment. While guidance on the use of GenAI in education is emerging,[177] and studies increasingly emphasise the importance of safeguarding children's rights,[178] it is not yet apparent that children's rights are realised in a digital world or that remedies are available when those rights are not upheld.

Although our audit focused on the UK, the global reach of GenAI tools prompted us to consult voices beyond the UK, and we hope our findings are useful more widely. Educators, policymakers and developers will recognise the dilemmas of platforms potentially undermined by poor implementation and regulatory gaps, exposing children to unnecessary risk. A rights-based approach requires not just better design, but better judgment and governance. Children's needs, concerns and rights should be at the heart of decision-making about the role of GenAI use in and for education. Right now, that is not what is on offer to schools, teachers, parents, or, most importantly, children in the UK. It is beyond clear that an urgent reassessment is needed.

[175] Livingstone et al. (2024c, d), Samson & Pothong (2025).
[176] See ICO's research on and evaluation concerning particular sectors in the UK, see ICO (2025b).
[177] See UK Parliament (2025). Parliamentary debate regarding ICO's upcoming work on EdTech sector. DfE (2025a); Robertson (2025); SQA (2025); Atabey et al (2025).
[178] See, for example, Alan Turing Institute (2023, 2025a, b); BRAID (2024); Children's Parliament et al. (2025); Robertson (2025).

Appendix 1: Age Appropriate Design Code audit snapshot

Table 5. Summary of how the five case studies meet the Age Appropriate Design Code (AADC) standards, in accordance with data protection law.

AADC Standard	Character. AI	Grammarly	MagicSchool	Copilot	Mind's Eye
1 Best interests of the child	⚠	⚠	⚠	⚠	⚠
2 DPIAs	⚠	⚠	⚠	⚠	⚠
3 Age-appropriate application	✗	✗	✗	✗	✗
4 Transparency	✗	✗	✗	✗	✗
5 Detrimental data use	⚠	☑	⚠	⚠	☑
6 Policies/community standards	⚠	⚠	⚠	⚠	⚠
7 Default settings	✗	✗	✗	✗	✗
8 Data minimisation	✗	✗	✗	✗	✗
9 Data sharing	✗	✗	✗	⚠	✗
10 Geolocation	✗	✗	✗	✗	✗
11 Parental controls	☑	✗	✗	⚠	✗
12 Profiling	✗	✗	✗	⚠	✗
13 Nudge techniques	✗	✗	✗	☑	✗
14 Connected toys and devices	✗	✗	✗	✗	✗
15 Online tools	✗	✗	✗	✗	✗

☑ Data practice appears compliant with data protection regulation and guidance.
⚠ More information needed OR evidence of data practices that both align with or undermine the AADC standard and relevant Article(s) in applicable laws.
✗ Non-compliant violation of data protection regulation and guidance.

NOTE 1: We analysed evidence and concrete examples of data and design practices for each tool. However, there may be other non-compliant or good practice examples. We are open to comments and feedback and will update the report if any relevant changes are reported.

Note 2: The AADC standards in more detail are:

(1) The best interests of the child should be a primary consideration in developing and designing online services likely to be accessed by children and any data processing carried out.

(2) Data protection impact assessments (DPIAs) are required to assess and mitigate risks to the rights and freedoms of children likely to access the service, which arise from data processing.

(3) Age-appropriate application encourages the application of the AADC's standards in a way appropriate to the age range of children likely to access the service.

(4) Transparency requires that information given to users be concise, prominent and in clear language suited to the child's age and needs.

(5) Prohibits the use of children's personal data in ways that are shown to be or are likely to be detrimental to their health and wellbeing.

(6) Policies and community standards should be upheld and effectively communicated to the child in an age-appropriate way.

(7) Requires that the default settings offered to the child are the ones that offer the highest level of privacy.

(8) Only the minimum amount of personal data should be processed as needed to provide the service elements.

(9) Ensures that data is not shared unless there is a compelling reason to do so.

(10) Requires that options that make a child's location visible to others be switched off by default.

(11) Provides an obvious signal to the child when they are being monitored or tracked by parents or carers.

(12) Profiling should be switched off by default, with only narrow exceptions and appropriate protections.

(13) Should not be used to lead or encourage children to provide unnecessary personal data or weaken their privacy protections.

(14) Ensures that connected toys and devices that use information processing meet the AADC standards.

(15) Provides accessible tools to help children exercise their data protection rights and report concerns.

Appendix 2: Countries of the UK

England

In England, procurement decisions depend on the type of school, available budget and whether the whole school will use the technology, among other factors.[179] Interest in GenAI adoption in education concentrates on using GenAI to provide personalised feedback and support to students, especially for children with additional needs, and to help teachers reduce their workload on administrative tasks, lesson planning and creating educational resources so that they can have more time with students.[180] The Department for Science, Innovation and Technology (DSIT)'s report on AI opportunities and action plan 'anticipate[s] that AI will be a useful tool for assessment in the education sector.'[181]

The Department for Education (DfE) published its guidance on GenAI use in schools on 22 January 2025.[182] This stresses the importance of ensuring the safe and responsible use of GenAI, with a focus on safeguarding, data privacy and ethical considerations, and explicitly referring to key primary (e.g., data protection and copyright laws) and secondary laws (e.g., the AADC). The DfE highlighted the importance of ensuring equitable access to AI tools and supporting students and teachers to develop skills, to prevent GenAI use from widening educational inequalities. The DfE report also emphasised the need for further research to better understand the impact of GenAI on student learning and wellbeing.[183]

Other recent developments include:

- Ofsted has clarified its stance on AI use in assessments and published guidance for teachers and education institutions.[184]

[179] See Aston et al. (2022).
[180] DfE (2024b).
[181] DSIT (2025). The report refers to the DfE's GenAI and rules-based marking tool that 'showed 92% accuracy in a pilot with teachers on year 4 literacy work when drawing from appropriately coded educational data and content.' See DfE (2024d).
[182] DfE (2025a). This guidance is built on several reports, consultations and research the Department conducted between 2022 and 2024. The Guidance was updated on 12 August 2025.
[183] Note that the DfE's *Generative artificial intelligence use in education* research (2025a, b) showed that the concerns of adults, particularly teachers, about cheating, overreliance on AI, and the potential for bias are being addressed, while the concerns of students are mainly about being accused of plagiarism or AI detection, privacy, among others. The DfE published further guidance on GenAI use in schools, focusing on some concerns raised in the consultations (e.g., safety, and the necessity of filtering and monitoring GenAI use within school settings) and set out the expectations from different stakeholders, including schools, teachers and companies.
[184] Ofsted (2024).

- The UK government has invested £3 million in a content store to provide AI models with high-quality educational data. Additionally, £1 million was awarded to 16 technology providers to develop AI tools aimed at reducing teacher workload.[185]

- A total of £2 million was allocated to Oak National Academy to improve its AI-powered lesson assistant, Aila, which is claimed to save teachers 3-4 hours per week in lesson planning; £45 million is being invested to enhance digital connectivity in schools, with £25 million for wireless network upgrades and £20 million for fibre broadband improvements, ensuring reliable internet access and narrowing the digital divide nationwide.[186]

- DfE guidance for AI use in schools and colleges notes that schools and colleges should ensure AI tools and open-access LLMs comply with age restrictions. The guidance asks schools to consult Keeping children safe in education and refers to GenAI product safety expectations.[187]

- The calls and efforts to help schools and teachers choose and use EdTech (including assistive technologies) continue, but there remains no official list of AI-EdTech that is compliant with the laws and has independent evidence supporting educational benefits.[188]

Overall, the approach in England is towards the adoption of GenAI in education with the hope of helping teachers and students.[189] This is accompanied by high-level guidance to schools that encourages the responsible exploration of GenAI's potential in education while prioritising student safety and ethical considerations.

Scotland

In Scotland, local authorities (LAs) determine EdTech procurement in schools. Each LA has a list of digital technologies it approves, but these are fragmented (each LA keeps its own record). Some LAs have banned GenAI in schools while others allow it, leaving the decision to adopt GenAI tools to the schools and the teachers. In January 2025, in its response to a Freedom of Information (FOI) request, Education Scotland confirmed that it 'does not maintain a database of Apps and AI software being used in Scottish schools'.[190]

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[185] Ofsted (2024); HM Treasury & Evaluation Task Force (2011); Ofqual (2024); DSIT et al. (2025); Evaluation Task Force (2025).
[186] DfE. (2025b, 10 June).
[187] DfE (2015).
[188] See DfE (2025a) (see also https://questions-statements.parliament.uk/written-questions/detail/2025-05-21/54130). Note that the ICO has committed to drafting a statutory code on EdTech and a separate one on AI and biometrics (ICO, 2025d). See also ICO (2025f) on the DUAA and AADC.
[189] See, for example, DSIT et al. (2024).
[190] Scottish Government (2025).

The officially approved GenAI tools can be found in Glow (Digital Learning for Scotland, a national education platform provided by the Scottish Government and Education Scotland).[191]

- Currently, GenAI features in Microsoft 365 and Adobe Firefly are available through Glow to public authorities. In January 2025, Glow announced that Gemini is now available to all LAs in Scotland, noting that 'due to Gemini being classed as an 18+ app, Gemini will only be available to staff'.[192] Despite this age limit, Education Scotland and SQA surveys show that GenAI tools, including Copilot, are already used in some schools and in classrooms with children, although in some areas, internet connectivity remains a concern.

- According to a survey by ADES with 200 young people and 100+ teachers across Scottish schools, 93 per cent believe that AI has a place in the Scottish education system.[193] Students expressed both hopes (e.g., for personalised learning and inclusion) and concerns (e.g., data privacy, being accused of academic misconduct, AI detection tools and inaccuracies, and potential negative effects on human communication).

- A 2024 study with policymakers on GenAI use in Scottish schools found confusion about fragmented approaches across local authorities, leaving teachers insufficiently equipped to use AI in classrooms.[194] In a related study of children aged 14-17, they expressed concerns about their agency, educational value and privacy; they asked for companies to be held responsible and expressed trust in their schools for GenAI selection for their learning and use.[195]

- Ongoing initiatives in Scotland are addressing issues of capacity, training and knowledge exchange for GenAI use in education. For example, in collaboration with Education Scotland, Daydream Believers developed the GenAI in Education Exploration Hub to support educators and students in exploring and integrating GenAI into learning.[196] Another example concerns the revision of the curriculum, including changes that can support AI literacy in schools in Scotland. The process of curriculum revision is the subject of consultation and research by an expert group, including University of Edinburgh-led research on GenAI use in schools with and for children and teachers.[197]

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[191] Glow Scotland (2025a, b); see also Scottish Government (2025).
[192] Glow Scotland (2024a).
[193] ADES (2024).
[194] Robertson and Maegher (2024). See also Education Scotland (2024).
[195] BRAID (2024); Robertson (2025); Atabey et al. (2025).
[196] Other examples are University of Edinburgh (Robertson (2025); Atabey et al. (2025), BRAID, Scottish AI Alliance, Children's Parliament training and resources on children's rights and AI, training programmes for the public sector and teachers (https://daydreambelievers.co.uk/gen-ai).
[197] See Atabey et al. (2025); Robertson (2025); SQA (2025).

- In 2025, SQA announced the use of GenAI in assessments for special needs education to improve inclusion and accessibility.[198]

Northern Ireland

There is currently no concrete and unified approach to AI use in education, which requires both local oversight and ideally alignment with broader UK policy. Some developments and information regarding AI use in schools include:

- The Department of Education (Northern Ireland)[199] acknowledged the potential of AI to transform curriculum delivery, classroom interaction and student assessment.
- The Education Authority (EA) hosted an 'AI in education in NI' conference in 2023 to explore the regulatory, pedagogical and ethical dimensions of AI adoption in Northern Ireland's education sector.[200]
- Teacher confidence in using GenAI tools remains low in Northern Ireland. A 2023 Department of Education survey found that 76 per cent of teachers were not confident in advising students on their school's AI policy or ethical usage guidelines.[201]
- A 2024 survey conducted by the Royal Society of Chemistry found that 33 per cent of teachers in Northern Ireland had used AI in the classroom, and there is a growing interest in using GenAI in schools, especially at secondary level.
- Survey results indicate that many educators either do not feel equipped to incorporate AI tools effectively or find the current tools unreliable and need more guidance for using GenAI (the latter is also a finding of the Children's Parliament, Alan Turing Institute and Scottish AI Alliance research in Scotland).[202]
- The Department of Education announced its work with the Limerick-based company Nurture to introduce AI-driven teaching assistants in over 1,100 schools. The assistants will personalise learning, improve communication between teachers and students, and address some challenges, such as

[198] See SQA (2025).
[199] Department of Education (2025).
[200] The Education Authority (EA) has responsibility for education and youth services in Northern Ireland (www.eani.org.uk). It is sponsored by the Department of Education (Northern Ireland). Despite these efforts, there is no dedicated AI strategy in the Department of Education's Draft Programme for Government (2024-27). Nor is there a statutory requirement to teach AI or digital literacy specifically focused on AI in Northern Ireland's primary or secondary school curriculum. The Council for the Curriculum, Examinations & Assessment (CCEA), which oversees Northern Ireland's curriculum and qualifications, has described its approach to GenAI as both 'agile' and 'reactive'.
[201] See Holmes (2024).
[202] Alan Turing Institute (2024); Children's Parliament et al. (2025).

teacher capacity development needs identified in the research.

- The Council for the Curriculum, Examinations & Assessment (CCEA) adopted guidelines concerning AI use in assessments in 2025.[203] The Minister of Education announced that the Department of Education had not focused on introducing an AI-specific strategy, 'building pupil competence and knowledge of AI',[204] and an independent review of the curriculum (e.g., focusing on literacy and numeracy) was commissioned following recommendations from the Independent Review of Education. In June 2025, the government announced a research study to focus on evaluating AI tools to support literacy.[205]

Wales

In January 2025, the Welsh government announced its guidance on GenAI use in schools on Hwb, the national education platform.[206] This new guidance focuses on using GenAI in Wales to help schools explore its adoption.[207] The government prepared this guidance document with input from the UK Safer Internet Centre, Common Sense Education, Praesidio Safeguarding and Internet Matters.

The Welsh government appointed school inspectors to evaluate AI use in classrooms and engage in knowledge sharing among teachers and schools as a part of a national review (including surveys and discussions with schools) to identify best practices and challenges. The guidance *Generative artificial intelligence in education* was recently published in 2025.[208]

Lastly, although the Welsh government and education authorities have significant work and focus on child rights in the context of schools, the AI and GenAI-related discussions do not seem to be a priority of current efforts in Wales – unlike Scotland, where the government and public authorities, and relevant stakeholders such as the Children's Parliament and Education Scotland, are directly working on the impact of AI on education, with clear links to child rights and what these mean for the curriculum, school responsibilities, guidance for teachers and beyond.

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[203] According to the updated Joint Council for Qualifications (JCQ) policy, students may only use AI-generated material in coursework or assessments if its use is transparently declared and appropriately referenced (JCQ, 2025).
[204] 'The Department has not considered developing an individual strategy around building pupil competence and knowledge of AI. As announced in my statement in response to the recommendations from the Independent Review of Education, I have commissioned an independent review of the curriculum, and I intend to develop a new strategy on literacy and numeracy as a priority' (Paul Givan MLA, Minister for Education, cited in Holmes, 2025).
[205] Department of Education (2025).
[206] Education Wales (2025).
[207] Education Wales (2019).
[208] See Welsh Government (2025). Published GenAI resources on Hwb, an online platform for schools, includes an AI-driven blended learning toolkit with frameworks like SAFE (Setup, Action, Format, Examples) for lesson planning, including a Blended Learning expert bot to support teachers. See Education Wales (2025), published as a part of *Education digital standards* (Education Wales, 2019).

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Digital Futures For Children

Research at LSE and 5Rights Foundation

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