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Framework for the educational use of Generative Artificial Intelligence in the European Schools

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Contents

Introduction

The European Schools recognise the need to frame and guide the educational use of generative artificial intelligence (generative AI, genAI or GenAI), considering its rapid and widespread adoption and potential transformative impact on cognitive practices, education, and many areas of our societies. Unlike other AI systems that may be integrated gradually, generative AI tools are already widely accessible to educators and learners. This accessibility necessitates addressing pressing questions and potential risks while embracing unprecedented opportunities to enhance teaching and learning.

This framework aims to enable European Schools to effectively leverage generative AI, ensuring its use aligns with legal, inclusive, human-centred, and ethical principles. This initiative seeks to build a foundation of trust and provide the European Schools community with a balanced framework for optimising the use of generative AI in education. The approach respects the multi-tier governance model under which European Schools operate. Providing a system-level framework enables each school to develop tailored policies that bridge global concepts with national and local contexts.

Generative artificial intelligence

Generative artificial intelligence[1] can create content (text, images, sound, video, or code) based on patterns learned from training on large datasets. Generative AI systems generate human-like outputs using probabilistic computations[2]. They make it possible to automate several tasks that were previously difficult to automate[3]:

- **Generating** content (such as images, videos, music, text, computer code, or even simulating human-like spoken interaction)
- **Reprocessing** existing content (such as correcting or translating texts)
- **Analysing** data (such as sorting or summarising documents)

Generative AI is now widely available through everyday applications, devices, user-friendly conversational interfaces (e.g., conversational agents like chatbots), and integration into social media platforms.

[1] Artificial Intelligence is the study and development of computer programs (algorithms) that perform tasks requiring human-like cognitive abilities. The recent progress in AI has been spectacular since the 2010s due to the sophistication of models, the availability of data, and the explosion in computing power, supported by the emergence of cloud computing.

[2] Generative AI models relies on computational models extensively trained on large datasets (through machine learning) and fine-tuned by developers to produce multimodal outputs (text, images, sound, video, code). They 'learn' the relationships between these training data. By leveraging statistical predictions, these complex algorithm-driven systems draw on the parameters from their training to create new content or tackle novel tasks—a process known as 'generalisation.' The content generated is similar to the training data but is not identical.

[3] See CNIL's Q&A on the Use of Generative AI Systems: https://www.cnil.fr/en/cnils-qa-use-generative-ai-systems

Generative AI systems can be considered a ‘General Purpose Technology’ as they can potentially drive transformation across various sectors and practices[4]. Like with the steam engine, electricity, or information technology, we ought to appreciate the transformative potential of generative AI while remaining aware of the myths and expectations surrounding it[5].

Scope

The scope of this document focuses on the educational use of generative AI, addressing activities related to teaching and learning. This initiative does not address broader AI technologies. Prioritising generative AI over other forms of AI is justified by its accessibility and transformative potential[6]. Unlike other AI systems that can be integrated incrementally, generative AI technologies are already widely available to educators and learners through various interfaces. This widespread accessibility necessitates addressing urgent questions and potential risks while seizing unprecedented opportunities to enrich teaching and learning.

Similarly, this document does not encompass broader school operations, such as human resources, procurement, or IT. Nevertheless, it is a first step toward developing a more comprehensive AI governance covering all aspects of AI (general purpose and single purpose) and AI usage in the European Schools and the Office of the Secretary-General.

Generative Artificial Intelligence in Education

There are three main areas of application of generative AI in education, depending on whether the technology supports the learner, the teacher, or the education system[7]:

- **Pupil-facing** generative AI interacts directly with pupils, enhancing learning experiences[8].
- **Teacher-facing** generative AI supports educators in various pedagogical and administrative tasks.

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[4] The recent advances in generative AI are due to the increased sophistication of programs, the availability of vast training datasets, significant leaps in computing power, and substantial financial investments, predominantly from leading technology firms based outside the European Union (EU).

Across Europe, companies, universities, and research institutes are also advancing IA and genAI, supported by the EU’s promotion of ethical, privacy-centred, and sovereign AI to shape its future. In this context, developing ‘open source’ genAI models, with publicly accessible and reusable training data and code is crucial (whereas, in ‘proprietary’ models, the computer code is private, inaccessible and cannot be freely modified by third parties).

[5] It is worth noting that, in its current stage of development, generative AI operates on a 'jagged frontier,' excelling in certain tasks while failing unpredictably in others.

[6] Generative AI models are general purpose AI (as opposed to single purpose AI). They will likely be increasingly capable of being factual, conducting reasoning, and understanding the physical world around us. AI and generative AI will accompany people continuously and in all their tasks, perhaps (e.g., with personalised assistants).

[7] These categories may overlap, as several players sometimes share uses.

[8] At the moment, as stated in this document, educators can introduce pupils to generative AI, but they cannot ask them to use it directly, as European schools do not yet have the necessary tools or legal provisions to enable them to use generative AI.

- **System-facing** generative AI operates at the organisational level, aiding in curriculum development, policy analysis and communication.

As a transformative technology, generative AI holds immense potential to enrich education, foster inclusivity in schools, and advance broader societal progress.

However, poorly designed, misused, or misunderstood generative AI tools can cause harm and undermine the agency of both educators and learners. They can introduce significant risks to veracity[9], privacy, exacerbate inequities, reinforce systemic injustices, create new forms of discrimination[10], and pose concerns for environmental sustainability.

Therefore, generative AI's potential should be harnessed with cautious optimism and informed practices. Above all, generative AI should be integrated to support the meaningful interactions between educators and learners that are at the heart of the educational experience.

Purpose and core goals

The European Schools Framework for Generative Artificial Intelligence aims to harness the opportunities of generative AI technologies while addressing their challenges[11]. It provides a balanced framework for the responsible, safe, ethical, inclusive, transparent, and effective use of generative AI in education for the benefit of educators, pupils, school leaders, inspectors, and parents/guardians.

It sets core rules and promotes a shared understanding of generative AI use in European Schools, structured around the following goals:

- **Educational integration**
  Promote the pedagogically informed and reflective use of generative AI tools to enhance teaching and life-long learning for all pupils while distinguishing between generative AI as a resource for acquiring subject content and as subject content per se, in alignment with the European Schools' values and objectives.
- **Legal compliance**
  Ensure adherence to relevant legal frameworks, including the EU AI Act[12] and the General Data Protection Regulation (GDPR)[13], safeguarding privacy and data protection.

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[9] Because of the stochastic nature of current generative AI technology, the same input data can produce different generated results. Generative AI can also produce plausible and appealing content that is not necessarily true or logical (the so-called "hallucinations"). Generative AI is thus potentially less trustworthy, especially for teaching factual and conceptual knowledge. It must, therefore, be used responsibly, especially in contexts where accuracy and truth are paramount.

[10] Generative AI's outputs may reflect biases, stereotypes, discrimination, and cultural harms present in their model (due to their training data and choices made by their designers).

[11] This policy doesn't address nongenerative AI such as predictive AI, which analyses data to forecast future outcomes, such as a pupil's likelihood of success in a particular course.

[12] Regulation (EU) 2024/1689.

[13] Regulation (EU) 2016/679.

- **Ethical and responsible practices**
  Promote the safe, responsible, ethical, transparent, and sustainable use of genAI technologies in education.
- **Equity and inclusion**
  Guarantee that genAI tools are employed in a manner that is fair, accessible, and inclusive, catering for the diverse needs of all learners.

These goals underpin the six interconnected principles and related statements outlined in this document, guiding the practical implementation of generative AI in European Schools.

Review and Evolution

To ensure the Framework remains relevant amid the rapid advancements in generative AI, the Office of the Secretary-General of the European Schools will lead regular reviews in collaboration with key stakeholders. This adaptive approach will allow to evolve in response to emerging trends and challenges.

European Schools Framework for Generative Artificial Intelligence in Education

Teaching and Learning

Generative AI tools are used to support and enhance teaching and learning.

Statements and aims

- **Educational impact:** Generative AI tools enhance and support teaching, pupil learning and school administration.
- **Pupil competence:** Curriculum and schools engage pupils in learning about generative AI tools, their potential strengths as well as limitations and biases, and to use them safely and proficiently to harness their educational benefits, thereby enhancing pupils' digital competence and deepening this learning as pupil usage increases[14].
- **Educator competence:** Educators are supported and trained in building AI literacy, enabling them to integrate generative AI effectively into teaching practices while maintaining their role as subject matter, pedagogical and didactical experts.
- **Critical thinking:** Generative AI tools are approached and used to support and enhance critical thinking and creativity rather than restrict human thought and experience.
- **Learning design:** When authorised by the school[15], tasks designed for pupils, including assessments, outline how generative AI tools should or should not be used by pupils and allow for a clear and unbiased evaluation of pupil ability. Generative AI tools should be used where they stimulate learning rather than remove the effort required for learning, for example, by providing shortcuts and giving a false sense of mastery.
- **Assessment:** Teachers should not rely in generative AI tools to assess pupils' learning. GenAI cannot replace teachers' holistic and contextual observation and interpretation of pupils' performance. However, teachers can use genAI as assistance, for example to draft their feedback and instructions. Teachers must always make sure that no pupils' personal data are entered in genAI tools.

[14] Educators can introduce pupils to genAI. However, they cannot currently ask pupils to use generative AI tools directly, as European schools still need the necessary tools or legal provisions to enable them to use genAI.

[15] See previous note.

Human, social, and environmental dimensions

Generative AI tools are used to benefit all members of the school community, considering their human, social and environmental impact.

Statements and aims

- **Wellbeing:** Generative AI tools are implemented and used in ways that do not harm the well-being and safety of any school community member and are used in ways that consider their alignment with pupils' varying developmental stages, ensuring suitability for different ages and capabilities.
- **Diversity of perspectives:** Generative AI tools are used in ways that expose users to diverse ideas and perspectives and avoid the reinforcement of biases and stereotypes (e.g., gender, cultural, racial, etc.).
- **Human rights:** Generative AI tools are used in ways that respect human rights, including individual autonomy and dignity.
- **Sustainable practices:** Generative AI tools are chosen and utilised in ways that aim to minimise their environmental impact, aligning with the European Schools' commitment to sustainability.

Transparency

School communities are provided with accessible and clear information on how generative AI tools work in a broad sense, how they can be used, and when and how these tools are impacting them.

Statements and aims

- **Information and support:** Staff, pupils and parents/guardians can access clear and appropriate information and guidance about using generative AI in the school context. More specifically, school leaders and educational staff receive dedicated professional development.
- **Disclosure:** School communities are appropriately informed when generative AI tools are used in ways that affect them. When applicable, appropriate consent forms are submitted to guardians.
- **Transparency and user awareness:** Schools ensure that all users broadly understand the methods used by generative AI tools and their potential biases and risks.

Fairness

Generative AI tools are used in ways that are inclusive, accessible, fair, and respectful.

Statements and aims

- **Accessibility and inclusivity:** Generative AI tools are used to enhance opportunities for all and are inclusive, accessible, and equitable for people with disabilities and from diverse backgrounds.
- **Equity and access:** All users' profiles are considered when implementing generative AI, and the school ensure that all users have equal access to genAI tools.
- **Non-discrimination:** Generative AI tools are used to minimise opportunities for and counter unfair discrimination against individuals or groups.

Accountability

Generative AI tools are used in ways that are open to challenge and retain human agency and accountability for decisions.

Statements and aims

- **Human responsibility:** Users retain decision-making control and remain accountable for decisions supported by generative AI tools.
- **Reliability:** Generative AI tools are tested before they are used to assess that they reliably operate in accordance with their intended purpose. It is fundamental to pay close attention to the output proposed by the genAI and check the data's veracity.
- **Monitoring:** The impact of generative AI tools on school communities is actively and regularly monitored under the supervision of the Directors and Data Protection Officers, with the support of the Digital Learning Coordinators, and emerging risks and opportunities are identified and managed.
- **Contestability:** Under the supervision of the Data Protection Officers and the School's management, members of school communities impacted by generative AI tools are actively informed about and have opportunities to question the use or outputs of the tools and any decisions informed by the tools. Users know who to contact if they find, for example, that the system is not working correctly, is discriminatory or biased, and how to lodge a complaint.

Legal, Security and Safety Compliance

***Users of generative AI tools respect all AI applicable legislation in the European Union and schools and follow* appropriate procedures[16] to mitigate risks and respect fundamental rights.**

Statements and aims

- **Privacy, Data Protection, and Transparency**: Generative AI tools must be used in a manner that respects fundamental rights[17], including privacy, and upholds data rights, fully complying with the General Data Protection Regulation (GDPR), the EU AI Act[18], and the rules of the European Schools. These tools shall avoid data collection and retention beyond educational purposes (e.g., prevent processing for third-party commercial purposes).
  Under the supervision of school management advised by data protection officers, school communities must be transparently informed about data collection practices and the intended use of generative AI tools. Consent must be sought where required, ensuring alignment with GDPR and school policies.
- **Personal data**: To avoid any data breach, generative AI tools shall not be provided with personal data of pupils or staff unless explicitly authorised for educational purposes by the school director (as Data Controller).
- **Use of generative AI by pupils:** While educators can inform pupils about generative AI, they must not ask them to use it directly until generative AI tools have been approved and dedicated regulations have been established. (At present, at the system-level, there are no tools or legal provisions enabling pupils to use genAI). If a school has approved a generative AI tool, it must swiftly comply with the EU AI Act obligations. Once appropriate tools and legal provisions are put in place in the European Schools system, pupils above 13 will have to respect the regulations established when using genAI[19] (In any case, pupils under age 13 will still not be legally allowed to create genAI accounts with their school or personal email).
- **Privacy disclosure:** Under the supervision of the school's management advised by the Data Protection Officers, school communities are proactively

[16] The Office of the Secretary-General of the European Schools aims at developing internal AI governance and procedures. These procedures can range from conducting data protection impact assessments (DPIAs) before deploying new genAI tools, establishing clear protocols for data breach reporting, and providing regular training to staff and students on responsible genAI use.

[17] Notably according to the Charter of Fundamental Rights of the European Union (2012/C 326/02).

[18] The implementation phase of the EU AI Act does not mean that legislation does not apply: The EU AI Act provides for 24 months to implement governance for high-risk AI. Any high-risk AI tool adopted during the implementation must go through the governance process.

[19] Unless provided otherwise by national legislation.

informed about how and what data will be collected, used, and shared while using generative AI tools, and consent is sought where needed.

- **Protection of pupil inputs:** Staff and pupils take appropriate care when entering information into generative AI tools, which may compromise any individual's data privacy.
- **Copyright compliance:** Schools are aware of and take reasonable measures to comply with applicable copyright rights and obligations when using generative AI tools.
- **Protection of internal documents:** While users must not share internal documents with any generative AI tool, they can share official public documents (e.g., documents on www.eursc.eu).
- **Development of generative AI tools:** Staff and pupils are currently not allowed to develop genAI tools or change the intended purpose of an AI (due to the requirements of the EU AI Act, especially in relation to transparency, safety, and data protection).

Alignment

Alignment at the internal level

The Framework aligns with existing European Schools policies and goals, notably:

- Digital Education Vision for the European Schools system (2018-12-D-7).
- Digital Competence Framework for the European Schools (2020-09-D-51).
- Structure for all syllabuses in the system of the European Schools (2024-11-D-42), especially concerning the General Objectives of the European Schools, the Didactic Principles and Assessment.
- Guidelines on Ethics and Integrity in the European Schools (2022-06-D-23).
- Quality Assurance and Development in the European Schools (2000-D-264).
- Summative assessment from s4 to s6 in the European Schools: Pedagogical and organisational arrangements (2022-12-D-19).

Alignment at the European Union and international levels

The Framework aligns with the European Union's overall digital strategic priority to make Europe fit for the digital age[20], the Digital Education Action Plan (2021-2027)[21], the European Regulatory Framework on Artificial Intelligence (EU AI Act)[22], the General Data Protection Regulation (GDPR)[23]. It aligns more specifically with the *Ethical guidelines on the use of artificial intelligence (AI) and data in teaching and learning for educators*[24], the *European Framework for the Digital Competence of Citizens* (DigComp)[25], the *European Framework for the Digital Competence of Educators* (DigCompEdu)[26]. It also draws on information reports of the European Digital Education Hub team 'AI in Education'[27].

The Framework aligns with UNESCO's key documents: *Beijing Consensus on Artificial Intelligence and Education*[28], *Artificial Intelligence and Education: Guidance for Policy-makers*[29], Guidance for the Use of Generative AI in Education and Research[30], AI Competency Frameworks for Teachers[31] and AI Competency Framework for

[20] A Europe fit for the digital age: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age_en
[21] European Commission (2020). Digital Education Action Plan 2021-2027: Resetting education and training for the digital age. https://education.ec.europa.eu/focus-topics/digital-education/action-plan
[22] Regulation (EU) 2024/1689. See also https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai.
[23] Data protection in the EU: https://ec.europa.eu/info/law/law-topic/data-protection_en.
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Students[32]. The Framework also aligns with the United Nations' sustainable development goal #4: "*Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all*"[33].

The Framework is informed by the OECD's Recommendation of the Council on Artificial Intelligence (2024)[34].

References and Attributions

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