



D6.3: First Policy Brief



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Vision of the project

GenAI4ED is here to empower students, teachers, parents, and guardians with the knowledge and skills to navigate the world of generative AI in education. We want to foster a digital-literate society that can make smart, informed decisions about the role of AI in education.



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Acronyms

Acronym	Full Form
AI	Artificial Intelligence
AI Act	Artificial Intelligence Act
DigComp	Digital Competence Framework for Citizens
EC	European Commission
EU	European Union
GEARS	Group, Evaluation criteria, Assessment indicators, Review method, Source & data type
GenAI	Generative Artificial Intelligence
GenAI4ED	Generative AI for Education
GDPR	General Data Protection Regulation
ID	Identity
OECD	Organisation for Economic Cooperation and Development

Executive Summary

Educators and students nowadays encounter a rapidly expanding ecosystem of AI applications and tools, many of which are insufficiently regulated and may contravene data-protection requirements or child-safeguarding norms. Within this shifting context, teachers are increasingly expected to embed AI in classroom practice while responding to institutional mandates, adapting pedagogies, and discerning which tools are both safe and pedagogically sound. The increasing availability of GenAI tools, coupled with limited AI literacy, frequently results in additional workload, ambiguity, and reluctance to adopt.

Despite the efforts of the European Commission to establish a sound regulatory framework for AI, a strong gap persists in awareness and guidance, which underscores an urgent requirement for credible support to ensure ethically responsible AI adoption and meaningful use of GENAI tools and application in education.

The GenAI4ED project address the current challenges in the implementation of GenAI in education in Europe by adopting an approach based on research, systematic dialogue with relevant stakeholders and co-design with the future users of the GenAI4ED platform, which will allow students, teachers, parents, and guardians to explore and use generative AI tools suitable to their specific needs.

With the first issue of the GenAI4ED Policy Brief (a second one is scheduled for September 2027), we aim to provide evidence-based recommendations to policy makers and practitioners on the safe and meaningful use of Generative Artificial Intelligence (GenAI) in education.

D.6.3 provides the “long version” of the Policy Brief. A more concise version with a proper layout will be produced and shared with a dedicated communication campaign in January 2026. The public, short version of the policy brief will summarise the content of D.6.3 and focus particularly on the GenAI4ED evidence-based recommendations for policy makers.

D.6.3 is structured as follows:

- Chapter 1 presents the GenAI4ED ID card, summarising the main features of the project.
- Chapter 2 provides an overview of the policies and initiatives promoted at EU level to support and regulate the use of AI and GenAI in education, highlighting strengths and weaknesses of the current policy framework.
- Chapter 3 and 4 focus on the GenAI4ED project, positioning it in the EU context and describing the methodological approach adopted, based on research, stakeholders’ engagement and co-design.

- Chapter 5 identifies the emerging gaps in the use of GenAI in education resulting from the research, consultation and co-design activities of the project and considering the perspectives of the whole ecosystem involved in the design and fruition of GenAI tools (students, guardians, teachers and designers).
- Chapter 6 addressed policy makers at the EU and national level, national authorities and practitioners with a set of recommendations to fill the identified gaps.

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1 Introduction

GenAI4ED - A platform for Assessing and Bridging Generative AI (GenAI) and Human Skills in Secondary Education is a three-year project funded by the Horizon Programme, which started in October 2024. Led by Trilateral Research Ltd, the consortium counts 10 partners including schools, research centres, academic institutions, stakeholders' networks and solutions providers.

The GenAI4ED ID CARD

Challenges we aim to address

- **Reducing the digital literacy gap:** improve digital competencies, skills and values among students, teachers, parents and guardians.
- **Promoting responsible use of GenAI for education,** while maintaining academic integrity and originality.
- **Preserving human connections:** ensuring AI complements, rather than replaces, the social and mentorship roles essential to teaching.

Our approach

- **Interdisciplinary Research:** Analysing AI's impact on secondary schools (ages 11-18) with insights from technology, psychology, pedagogy and policy experts.
- **Student-centred approach:** understanding how GenAI can enrich students' learning experiences and originality while maintaining academic integrity.
- **GenAI literacy for educators:** supporting teachers to master GenAI knowledge, skills and responsible use values, to maintain their wellbeing and work-life balance.
- **Engagement with parents and guardians:** Actively involving parents and guardians in the conversation, listening to their perspectives, and concerns, and incorporating their insights for a well-rounded approach.

Our results and services

- **GenAI4ED platform:** a dynamic and user-friendly platform where students, teachers, parents, and guardians can explore generative AI tools designed for education, gain insights into their functionality, and develop critical thinking skills to evaluate and responsibly integrate these technologies in the learning process.
- **Guiding policies:** Sharing actionable recommendations to better use GenAI tools and integrate them responsibly in learning and teaching.
- Evidence-based improved **understanding of the impact of GenAI** in secondary education.

Figure 1: The GenAI4ED ID card

With this Policy Brief, we address policymakers and practitioners at different levels in Europe with a set of evidence-based recommendations and suggestions (stemming from the research results achieved by the project so far) to enhance a meaningful integration of GenAI in education.

2 The European Policy Landscape

GenAI (AI that can create original content such as text, images, video, audio or software code in response to a user's prompt or request)¹ is having a disruptive impact on our society at a global level, influencing everyday life by presenting incredible opportunities and severe challenges, at the same time: on one side, it paves the way for increased access to knowledge and resources to a broader audience; on the other side, it presents challenges related to bias risk, over- and uncritical reliance on AI generated content, dis- and misinformation related, for instance, to Deep Fakes, and risks related to data breaches or misuse, with negative implications for privacy and human rights preservation.

2.1 Regulatory framework

In the EU, a comprehensive regulatory framework is being established to ensure a safe and meaningful use of AI and GenAI in our life, with implications also for education:

The EU AI Act advocates for a cautionary approach to incorporating AI in education, recognising its potential risks and benefits. It outlines the importance of careful human supervision to avoid risks to equality and non-discrimination. Particularly, those uses related to admission to educational courses, and assessment of learning outcomes and behaviour during tests are classified as "high-risk"

Despite increased attention to safeguarding children's rights, there remains a gap in current policies referring to the integration of GenAI in educational settings, with their target audience mainly aimed at teachers, paying comparatively little attention to students, parents or policymakers.

The European Commission (EC) has issued three key guiding documents on AI and digital education. Together, they emphasise the need for ethical, inclusive, and strategic integration of AI in teaching and learning, to ensure a future-ready, equitable digital education ecosystem. The **Digital Education Action Plan 2021-2027** outlines a broad policy framework focused on infrastructure, digital skills, and innovation, addressing AI as a key transformative tool. The **AI Squad Report** highlights the importance of developing differentiated teacher competences for teaching *with*, *about*, and *for* AI. The **Ethics Guidelines for trustworthy AI** stress safeguarding human agency, transparency, and fairness in AI use and contains some

¹ <https://www.ibm.com/think/topics/generative-ai>

guiding steps to judge whether AI technologies are inclusive and adaptable to students with disabilities.

Complementing the Digital Education Action Plan, two Council Recommendations adopted in November 2023 guide Member States: one on the key enabling factors for successful digital education (governance, infrastructure, teacher training, evaluation)², and a second on improving the provision of digital skills and competences across the lifespan³—both relevant for mainstreaming AI literacy and whole-of-system readiness. Finally, the **European Declaration on Digital Rights and Principles** provides a normative umbrella—child-appropriate, safe, and human-centric digital environments—informing how generative AI should be introduced and governed in schools.

Together, these instruments connect legal compliance, capacity-building, and ethics into a coherent roadmap for GenAI adoption in European education.

2.2 The Skills Challenge

A key challenge that Europe needs to address to ensure a proper, secure and meaningful use of AI in general, and of GenAI specifically, is related to skills: only by counting on skilled citizens able to understand what AI is and how to use it, a virtuous process of meaningful technological innovation can be enhanced.

The recent adoption of the **Union of the Skills communication** and of the **AI Continent Action plan** highlight that “anticipatory governance, a culture of innovation, supporting diversity and inclusiveness (..), and strengthening digital infrastructure are all critical to ensuring that the benefits of AI are shared by all, while minimising its negative impacts”⁴.

The **Generative AI Outlook report** calls for a strong focus on AI literacy for citizens in general, and in education in particular, to address the challenges and risks related to ethics, privacy, dis- and misinformation and to ensure that AI is used as a complement and not as a replacement in education. In other words, to fight the risks associated to the use of AI in schools and to ensure that critical thinking and cognitive skills of students are preserved and nurtured rather than replaced by a machine, it is essential to train teachers, parents, guardians and students on what AI is and how to best use it, in an honest, meaningful, balanced and respectful way. In this context, the new **DigComp 3.0** published by the European Commission and the OECD in November 2025 integrates AI-related skills into the digital skills framework, paving the way for a uniform approach to teacher training on AI at a European level.

² <https://data.consilium.europa.eu/doc/document/ST-15741-2023-INIT/en/pdf>

³ <https://data.consilium.europa.eu/doc/document/ST-15740-2023-INIT/en/pdf>

⁴ [https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/765806/EPRS_BRI\(2025\)765806_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/765806/EPRS_BRI(2025)765806_EN.pdf)

3 The Role of GenAI4ED in the current context

Educators and students nowadays encounter a rapidly expanding ecosystem of AI applications and tools, many of which are insufficiently regulated and may contravene data-protection requirements or child-safeguarding norms.

Within this shifting context, teachers are increasingly expected to embed AI in classroom practice while responding to institutional mandates, adapting pedagogies, and discerning which tools are both safe and pedagogically sound. The increasing availability of GenAI tools, coupled with limited AI literacy, frequently results in additional workload, ambiguity, and reluctance to adopt.

Although students' digital skills are increasing, they commonly lack the competencies to engage with AI tools in a critical and secure manner; meanwhile, parents and guardians are frequently unaware of the benefits and the risks these technologies entail.

This gap in awareness and guidance underscores an urgent requirement for credible support to ensure ethically responsible AI adoption and meaningful use of GenAI tools and application in education.

The GenAI4ED initiative addresses this need by designing, developing and testing a dynamic and user-friendly platform where students, teachers, parents, and guardians can explore generative AI tools designed for education, gain insights into their functionality, and develop critical thinking skills to evaluate and responsibly integrate these technologies in the learning process.

This project aspires to create a more digitally literate, inclusive and adaptive educational environment where human skills and AI effectively complement one another. It seeks to answer critical questions about the role of GenAI in education, thereby offering insights that could shape future policy and practice in line with the European Commission's strategic goals.

4 Our approach

To achieve our scope, we have adopted an evolutionary approach with the following features:

- Active engagement of citizen representatives (teachers, students, parents) and other key stakeholders in the specification, design and evaluation of the foreseen tools and integrated solution throughout the project (citizen science).
- Continuous alignment of the GenAI4ED platform with established education and training practices, policies and directives.

- Incremental development approach, ensuring that end users can experiment with the GenAI4ED outputs from early stages of the project (from prototype to final, integrated versions).

The main building blocks of our approach can be synthesized as follows:

Research - Platform design is based on the experience of the GenAI4ED consortium and is fed by the results of the systematic research carried out in the project's first year, focusing on:

- **Systematic literature review on policies and guidelines** for the use of GenAI in education.
- **Structured dialogue with key stakeholder groups** (teachers, parents, students and AI experts) to gather their perceptions, use habits and concerns in the use of GENAI for learning and teaching.
- **Definition of a taxonomy for GenAI tools** for education, helping the classification and a first evaluation of their suitability to specific activities, target groups and educational contexts.

Co-design - Based on consultation and co-design activities with teachers, educators and AI experts, the GenAI4ED project has developed the **“G.E.A.R.S.” (Group, Evaluation criteria, Assessment indicators, Review method, Source & data type) framework**, which allows for distinct stakeholder viewpoints in assessment, instead of merging conflicting assessments into a single composite score. GEARS comprises 56 criteria, across four stakeholder groups: students (18), teachers (12), parents/guardians (12), and AI experts (14). Each group brings unique priorities and evidence sources, enabling a multi-dimensional assessment of educational AI. The framework addresses key areas such as usability and accessibility, learning effectiveness, ethical and trust considerations, technical reliability, and developmental impact and provides a practical method for categorising GenAI tools and can be tailored to meet the needs of different stakeholder groups. In parallel, co-design workshops targeting the key GenAI4ED stakeholder groups, offered valuable insights on the user requirements for the GenAI4ED platform.

Development and testing – The GenAI4ED platform is currently being designed, based on the input received by users and AI experts (through questionnaires, interviews and co-design workshops) as well as on the outcomes of our research. In pilot experiments in selected schools, students, parents and educators will be asked to use the GenAI4ED platform to test and evaluate the recommendation engine and the available tools. The piloting phase will lead to a validated platform, accessible in the long term to anyone interested, enhancing the meaningful use of GenAI in secondary education, in Europe and beyond.

Policy advice - Through an interdisciplinary approach involving teachers and parents, along with AI experts and psychologists, and bearing in mind the ethical concerns identified through the project's research, GenAI4ED will utilise the results of the pilot experiments to develop policy recommendations. These recommendations will address best

practices in harnessing the benefits of GenAI tools to enhance the teaching experience for both students and educators, while protecting the teachers' jobs, improving their working conditions and creating opportunities for new teaching roles.

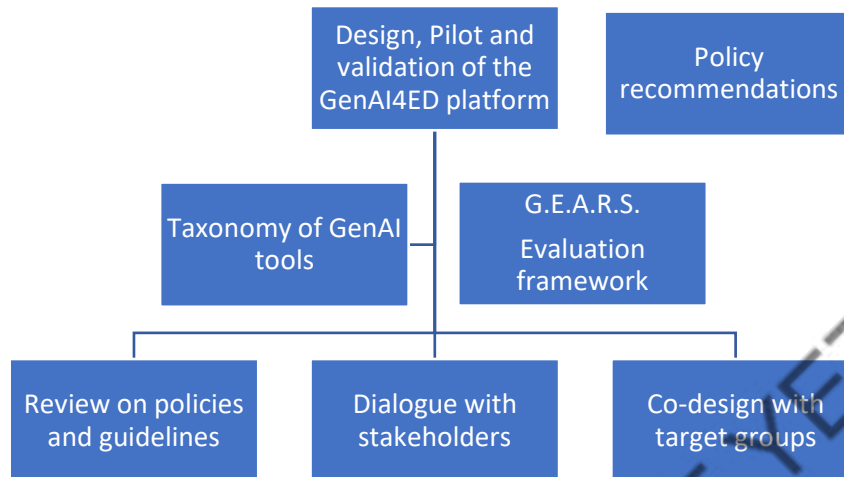


Figure 2: The GenAI4ED approach building blocks

5 Evidence from GenAI4ED

5.1 Understanding the landscape surrounding GenAI in secondary education

At the macro level, the **Societal Readiness Level (SRL) assessment** conducted across multiple European countries reveals a mixed landscape of preparedness for integrating GenAI in secondary education. Overall, **Governance and Technological Readiness appear relatively strong** from official reports and statistics, indicating that most countries have foundational digital infrastructure and institutional capacity to support AI adoption. However, **readiness remains significantly lower in the areas of Policy, Ethical and Regulatory Frameworks, and AI Literacy**.

Analysis of publicly available datasets and surveys shows that policy gaps, including the **absence of national guidelines, lack of ethical frameworks, and limited AI-specific education strategies**, constitute the greatest barriers to responsible and equitable GenAI integration. **Country-level comparisons also reveal substantial variability**, with some education systems demonstrating well-developed governance structures but limited socio-cultural readiness or curriculum alignment.

Taken together, the analysis underscores a pressing need for **coherent policymaking, targeted capacity-building, and ethically grounded implementation strategies** to ensure that GenAI can be deployed safely, effectively, and inclusively across European secondary education. **Enhancing AI literacy among educators and learners** must be prioritised, alongside adequate institutional support mechanisms.

In parallel, the systematic review of current policies and guidelines on GenAI in education conducted through the project highlights the **lack of formal policies on this issue. Guidance documents in Europe miss opportunities to reference the EU AI Act**. Similarly, the **topics of environmental impact of AI tools, the digital gap or access for students with special needs are seldom addressed**. Recommendations are, in their majority, **addressed to teachers, providing loose advice on GenAI leveraging, rather than concrete steps on safe and responsible use**. The need for training is emphasized across group recommendations. **Plagiarism or cheating and the mitigation** of these practices assisted by GenAI play a central role in these documents. **Guidance for parents or guardians is minimal** and with a clear focus on data protection, recommending the development of literacy as a precaution, without specific measures.

Emerging gaps:

- *Lack of coherent policy frameworks on the use and teaching of AI in education*
- *Weak ethical and regulatory guidance*
- *Insufficient AI literacy and training*
- *No references in current guidelines to the EU AI Act, and no official policies that can hold users or developers responsible for misuse*
- *Lack of sufficient consideration for equitable access (special needs and different learning profile students in the design and adoption of tools).*

At the meso level, findings from the systematic review of academic literature are multifaceted, pointing equally to benefits to GenAI adoption in education, and concerns:

- Among the **benefits, GenAI provides opportunities for autonomous learning and feedback, personalisation and individualisation, design and planning.** These benefits drive both teachers and students to regard this tool as a promising educational aid and a useful resource to save time.
- Among the **concerns, plagiarism, data protection, and dependency** are highlighted by both groups. The research identifies **notable gaps in AI literacy**, noting the **need for training and prompt engineering and ethical adoption practices** as key for successful AI adoption.
- In addition, this study notes a **stark gap in the literature, in relation to teacher wellbeing and working conditions.**

As concerns **tools, these appear to be chosen mainly through exploration and revision of insights, or by comparing different tools and models.** The **top tasks where GenAI tools add value are assessment content creation and writing assistance**, with the top benefited subjects being English and mathematics.

In this context, the GenAI tools taxonomy is organized around different tools' dimensions: possible educational users, ideal target users, ideal domain of use, technical descriptions, and possible risks. In line with the results of the systematic literature review, our study on tools' taxonomy reveals the affordances of these tools for curriculum designing and planning, content creation and personalisation, assessment, feedback, collaboration, and autonomous learning. In addition, it identifies **risks in the design, including accuracy or hallucinations, ethical risks such as bias or unsafe outputs, and legal concerns like data privacy.** From this study six tools emerge as the most appropriate for the GenAI4ED platform's recommendation engine, and yet, none of them are void from risks in their design, highlighting the **need for clear regulations regarding the underage use of GenAI tools and general data privacy, transparency and accountability.**

Emerging gaps:

- *Lack of literature on the impact of GenAI tools on teacher wellbeing and working conditions. Potentially similar situation regarding student wellbeing.*
- *Lack of fully transparent and trustworthy tools.*
- *General lack of literacy among all stakeholder groups.*
- *Lack of substantially concrete guidance that supports responsible and safe use of GenAI tools.*

5.2 Understanding expectations and concerns of GenAI users in education

Findings from the **research conducted by GenAI4ED on users' expectations and concerns** reveal **general positive perceptions and expectations towards GenAI as an educational tool**, underscoring several **benefits like scaffolding, efficiency and personalisation across all three groups of students, teachers and parents**.

However, we find **stark differences regarding how stakeholders access and learn about these tools** (e.g., student exploration if guided by peers and social media, while teachers rely mostly on self-exploration and training activities, and parents on their institutions of work).

Stakeholders perceive **barriers in adoption**, highlighting lack of accuracy, limited tool understanding, and output limitations as GenAI's most notable shortcomings, **driving mistrust among users**. Literacy is, again, viewed as the main human barrier.

Parents remain the most mistrusting and skeptical group, and **both parents and teachers indicate higher levels of anxiety or technostress** and **express widespread concerns about misuse, over-reliance, reduced creativity and critical thinking, and insufficient training opportunities**. Both parents and educators highlight the **need for clear guidance, structured professional development, and curricula that meaningfully support AI literacy** to ensure responsible and effective GenAI use in education.

The field analysis conducted by GenAI4ED to support the platform's system specifications based on users requirements reinforce a picture where each user group has different priorities: Parents emphasise safety and wellbeing; Educators focus on academic integrity, fairness in assessment, and the impact of GenAI on everyday classroom practice; Students want usefulness and clarity without fear of being penalised amid unclear or shifting rules: At the same time, however, **all roles converge on three risks that must be managed in schools**, namely **over-reliance, misinformation, and privacy** for minors.

In short, stakeholders do not ask for tools alone but seek guidance, training, and transparency on available tools that clarifies where, when, and how each tool can be appropriately used in education

Emerging gaps

- *Lack of Subject-specific training and institutional support for teachers.*
- *Lack of Clear communication channels regarding GenAI use in classroom between institutions/teachers and parents/students.*
- *Lack of Tools' transparency and need for better discoverability of how GenAI tools operate, where their training data comes from, and how users' data is used.*
- *Lack of training that focuses on fact-checking practices, and safe and responsible GenAI use.*
- *Gaps in educational guidance add concerns about misuse, over-reliance and reduced creativity*

6 Recommendations

The **lack of coordinated European and national-level guidance** on the appropriate use of GenAI tools in education (emerging from the research conducted by GenAI4ED) presents a critical gap that must be addressed. The following recommendations outline key areas for policy development, stakeholder engagement, and responsible implementation of GenAI in education and address three levels of policy:

- **EU/national governments and authorities** (the “macro” level, for instance Ministries of Education)
- **Educational authorities** (the “meso” level, for instance public agencies responsible for teachers’ training)
- **Practitioners** (the “micro”-level, for instance schools and their ecosystem composed of teachers, guardians and students)

Each recommendation addresses one or more gaps and challenges identified in the previous chapters.

6.1 Recommendations to EU and national policy makers

Legal compliance

Gap	Recommendation
There is little or even no references in current national guidelines on the implementation of GenAI in education to the EU AI Act and there is a scarcity of official policies holding AI users or developers in education responsible for misuse.	Make sure that national governments integrate the provisions of the EU AI Act into national education frameworks, with a focus on children’s rights, transparency, and accountability in GenAI use.

Ethics and transparency by design

Gap	Recommendations
There is a weak ethical and regulatory guidance in the design and use of GenAI tools in education: these often fail to be fully trustworthy, highlighting the need for more transparency and better discoverability of how GenAI tools operate, where their training data comes from, and how users' data is used.	• Foster direct dialogue with GenAI developers to communicate gaps in existing tools, improve safety and usability, and build trust among all stakeholders • Require developers of GenAI tools to: • proactively mitigate risks related to data privacy and to implement robust safety measures • clearly disclose how information is sourced in alignment with the EU AI Act. • Be transparent on how GenAI tools operate, where their training data comes from and how users' data is used. • Show clear trust indicators in educational AI tools, including source, common limitations, and age appropriateness, so that users can better judge when and how to rely on them.

Wellbeing

Gap	Recommendation
There is a general lack of literature on the impact of GenAI tools on teacher wellbeing and working conditions, and a potentially similar situation is observed in relation to students' wellbeing.	Fund research on the impact of GenAI tools on the wellbeing of: - Teachers and their and working conditions. - Students' and their learning conditions.

6.2 Recommendations to educational authorities

Equitable access to GenAI

Gap	Recommendations
There is a lack of sufficient consideration for equitable access (i.e.: addressing special needs and taking into consideration the different backgrounds and different learning profiles students in the design and adoption of tools).	- Develop actionable guidance to help schools identify and address ways in which GenAI might exacerbate existing educational inequalities. - Address the language and access gaps by treating equity as a baseline, for example through localisation, accessibility features and low-bandwidth options, so that students can benefit regardless of their needs, learning profile, region or background. - Promote a culture of sharing inclusive GenAI practices, to help build a repertoire of good practices useful for stakeholders at national and EU level.

GenAI evaluation framework

Gap	Recommendation
There is a lack of competences in assessing the accountability and suitability of GenAI tools to specific learning scopes and settings.	Promote the use in education of evaluation frameworks for GenAI tools that incorporate distinct perspectives from students, educators, parents/guardians, and AI experts. Frameworks should go beyond technical performance to include pedagogical alignment, usability, ethical considerations, and developmental impact.

GenAI literacy for teachers

Gap	Recommendations
There is a still low level of GenAI literacy among European teachers: Subject-specific training and institutional support for teachers is needed to ensure a meaningful use of GenAI in education.	• Focus teachers' training on pedagogy, assessment and ethics rather than tool demos only, using scenario-based cases that address integrity and bias. • Train teachers to fact-check AI outputs, review tools before classroom use, and understand privacy policies. • Make available to teachers short, curriculum-aligned "starter" materials that model acceptable, conditional, and prohibited uses by subject and level, with worked examples and verification steps learners can follow.

6.3 Recommendations to practitioners

AI and GenAI Literacy for students

Gap	Recommendations
There is a still low level of AI literacy among European students.	• Teach Students safe practices, such as anonymising data and verifying content. • Avoid placing the burden of academic honesty solely on students: Teachers and guardians must help guide a broader shift, from viewing education as information consumption to fostering the critical examination of information sources. • Enhance access to practical resources, such as manuals, tutorials, GenAI-enhanced educational activities, or platforms like GenAI4ED, to support novice users in beginning their AI learning journey.

AI and GenAI literacy for families

Gap	Recommendations
There is a lack of clear communication channels regarding GenAI use in the classroom between institutions/teachers and parents/students. In addition, the level of AI literacy among parents is very low.	• Provide brief, plain-language notes for families on benefits, common failure modes, data handling, and simple supervision tips, so that schools and families share a clear and consistent message about GenAI use. • Enhance communication with families, offering parents and guardians detailed information on which tools are used in the classroom and how. • Enhance parents', guardians, and families' AI literacy by organizing trainings for parents and guardians in school buildings and/or with the support of parents' and families' associations.

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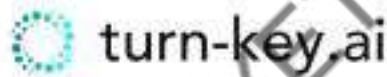
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