

# Unplug.Scot

**Unplug.scot Borders Subgroup Letter to Scottish Borders Council (SBC), issued on 3rd June 2026 in response to statement received from SBC on 29th April 2026**

## Our Concerns

Following SBC's recent response regarding the Inspire Learning programme, which stipulates mandatory iPad, Edtech and AI engagement from early years education, **many professionals and parents remain deeply alarmed. SBC continues to dismiss legitimate concerns over safeguarding, privacy, educational and children's rights whilst also refusing to provide meaningful, independently-verified evidence for their position.**

A growing number of Borders parents and professionals (in health, education and technology) continue to raise tangible and evidence-based concerns. Unplug.scot have logged multiple incidents of harm and apparent breaches of children's rights within SBC schools. SBC repeatedly assert vague educational benefits linked to the mandatory use of iPads and gamified EdTech from the earliest years of primary education. However, no meaningful, independent evidence demonstrating superiority over lower-screen alternatives has been produced at any point. **Significant international evidence now demonstrates the negative impacts of heavy device use on children's literacy, numeracy, concentration and wellbeing<sup>1234</sup>.**

World Health Organisation and recent NHS England guidance clearly state that for young children, fast-paced and gamified screen based content should be avoided as well as solo screen use<sup>56</sup>. The guidance does not differentiate between home and school use, and emphasises that long periods of time spent on screens can displace developmentally critical activities such as creative and physical play and interactions with caregivers. However, in SBC schools, young children are spending unrestricted periods of time on solo devices,

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<sup>1</sup> United Nations Educational, Scientific and Cultural Organization (UNESCO), *An Ed-Tech Tragedy? Educational Technologies and School Closures in the Time of COVID-19*, 2023. Book available at [this link](#).

<sup>2</sup> House of Commons Education Committee, *Screen time: impacts on education and wellbeing*, 2024. [Full Report](#)

<sup>3</sup> Karolinska Institutet, *Decision on Opinion on Proposal for National Digitalization Strategy for the School System 2023–2027*, 2023. Accessed at [this link](#) on 31 May 2026

<sup>4</sup> Health Professionals for Safer Screens, *The Impacts of Screen Media and Social Media on Whole Child Health*, April 2025, [Full Report](#)

<sup>5</sup> World Health Organization, *Guidelines on physical activity, sedentary behaviour and sleep for children under 5 years of age*, 2019, [Full Guidance](#)

<sup>6</sup> Department for Education and Department of Health and Social Care, *Best Start in Life: Screen Time Guidance for Under-5s*, 2026, Accessed at [this link](#) on 28 May 2026

using unregulated and gamified software, web-browsing on poorly-filtered search engines<sup>78</sup>, receiving lessons via YouTube and interacting with AI tools as standard<sup>9</sup>.

In the Scottish Borders, primary children are being issued with 1-1 devices (officially at P4+ but systematically from P1 in reality) and associated, complex acceptable use contracts - for the child to sign - that seek to shift the burden of online safety from SBC onto the child themselves. **SBC currently enforces mandatory 1-1 iPad use from a significantly younger age than any other local authority in Scotland. Staff are mandated to actively use iPads within SBC nurseries which care for toddlers as young as 2 or 3 years old<sup>10</sup>. Parents are consistently told they have no right to object.**

To make matters worse, **SBC have confirmed that no risk assessments have been carried out with regards to digital device use in their schools<sup>11</sup>, no Child Rights & Wellbeing Impact Assessments have been conducted<sup>12</sup> and no screen time policies exist<sup>13</sup>.** Additionally, parents from schools and parent councils across the Scottish Borders report a consistent pattern of inadequate engagement and limited responsiveness from Scottish Borders Council (SBC) when concerns are raised regarding the educational use of iPads. Where parental engagement sessions have been provided, these have often taken the form of **one-way information presentations, with little meaningful opportunity for open dialogue, scrutiny, or substantive question-and-answer discussion.**

Parents further report that **the evidence provided by SBC in support of its digital learning strategy is frequently selective, outdated, or of questionable evidential value.** Materials cited have included years-old datasets, studies whose conclusions have since been challenged or criticised, and proprietary reports produced by commercial vendors with a direct financial interest in promoting digital learning products. **Vendor-authored marketing and impact reports have been presented as evidence despite lacking the independence, methodological rigour, or peer review** normally expected of educational research.

**At the same time, parents have substantial concerns that the council's obligations to long term commercial contracts are overriding child safety and safeguarding concerns.** Further, SBC's ongoing lack of public transparency about the commercial arrangements and substantial contracts connected to the Inspire programme and wider Apple ecosystem only deepen these concerns. Parents' valid questions - regarding oversight, accountability, procurement scrutiny and the extent of commercial influence operating within Borders education - continue to go unanswered.

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<sup>7</sup> The Times, *Primary pupils accessed sexual and violent content on school iPads*, 29 April 2026, [Full Article](#)

<sup>8</sup> The Scotsman, *Children as young as 7 'can access porn' on Scottish council-issued iPads in Glasgow and Borders*, 26 Sept 2025, [Full Article](#)

<sup>9</sup> Scottish Borders Council, *AI Use With Pupils*, Inspire Learning SBC, Accessed at [this link](#) on 28 May 2026

<sup>10</sup> Scottish Borders Council Inspire Learning Early Years - *iPad Pedagogy of Play*, 2023. Accessed at [this link](#) on 28 May 2026.

<sup>11</sup> Scottish Borders Council, *FOI 20251015 - School Digital Device Protections*, 22 August 2025

<sup>12</sup> Scottish Borders Council, *FOI 20260379 - UNCRC Child Rights Impact Assessments (CRIAs)*, 14 April 2026

<sup>13</sup> *Statement issued to Unplug.scot by Scottish Borders Council*, received 29 April 2026

Recent concerns regarding SBC's expanding AI strategy<sup>14</sup> outlining mandatory use of AI in nurseries and classrooms (refreshed Jan. 2026), which parents may also not opt out of or limit, further reinforce the need for caution and parental choice. **The current approach appears weighted heavily towards AI adoption from an extremely young age (younger than the standard Terms and Conditions of providers would support), and perceived benefits, whilst providing very limited detail regarding precise approved AI systems being used with children, data retention and AI training risks, vendor assessments, lawful basis for processing children's data, significant profiling / manipulation / misinformation risks, and age-specific safeguards.** SBC's school AI use policy reads more like an AI adoption strategy than a child safeguarding and risk management framework. **Children as young as 6 are actively encouraged to "use AI programmes as search engines", "ask AI platforms for explanations when you need help" as well as using AI to "generate ideas", and SBC's own policies encourage AI use from nursery age and up.**<sup>15</sup>

Investigations by members of the Unplug.scot group also suggest that **children's data may be open to commercial use by Edtech providers**, being an established feature of the business model of such platforms.<sup>1617</sup> Concerns have repeatedly been raised regarding whether parents and pupils are provided with sufficiently informed choice or transparency regarding data processing by third-party commercial platforms, particularly where less intrusive or lower-risk educational alternatives are available. **ICO guidance states that processing under the public task basis must be "necessary", and that where the same purpose can reasonably be achieved without the processing, there may be no lawful basis other than voluntary, informed and explicit consent.**<sup>18</sup> Unfortunately, unlike other local authorities and despite multiple parental requests, SBC has continually refused to provide copies of any Data Protection Impact Assessments that may have been conducted.

**It is important to state clearly that iPad and EdTech use are not mandated by the Curriculum for Excellence (CfE), and certainly not for delivering all areas of the curriculum from the youngest years of primary education. SBC's own strategy documents acknowledge that local authorities possess substantial autonomy regarding curriculum delivery methods.** The widespread deployment of iPads and associated platforms is therefore an operational and commercial choice made by SBC, not a national curricular requirement. Digital technology comes in many forms, for example locked-down computer labs for word processing, animation or coding, basic robotics and digital scientific instruments. The CfE encourages the use of digital technology to support learning and

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<sup>14</sup> Scottish Borders Council, *AI in SBC Education*. Accessed at [this link](#) on 28 May 2026.

<sup>15</sup> Scottish Borders Council, *AI in SBC Education* (Scottish Borders Council, 2026), Accessed at [this link](#) on 28 May 2026

<sup>16</sup> Human Rights Watch report (May 25, 2022) "*How Dare They Peep into My Private Life?*": *Children's Rights Violations by Governments that Endorsed Online Learning During the Covid-19 Pandemic*, Accessed at [this link](#) on 29 May 2026

<sup>17</sup> Livingstone, S., Hooper, L., Atabey, A. (2024) *Educational Technology (EdTech): findings and summary*. Digital Futures for Children centre, London School of Economics and Political Science (LSE) & 5Rights Foundation, Accessed at [this link](#) on 29 May 2026

<sup>18</sup> Information Commissioner's Office (ICO) (n.d.) *A guide to lawful basis: Public task*, Accessed at [this link](#) 29 May 2026).

develop meaningful digital literacy in various forms and these concepts are supported by Unplug.scot as well as concerned parents across the board. **Placing young children in front of YouTube, AI platforms and gamified apps is not part of CfE guidance and recklessly conflates meaningful, safe digital skill acquisition with the passive consumption of highly stimulating, commercially-driven digital content via data-hungry platforms.**

SBC's explicit, unique position of banning any EdTech opt out to occur in Borders schools<sup>19</sup> is increasingly difficult to justify because schools in **neighbouring authorities (using the same CGI infrastructure and 1-1 iPad schemes, including Glasgow and Edinburgh City Councils), do support parents who wish to pursue opt-out arrangements.** SBC's refusal is therefore plainly a central SBC policy choice, not a technical or curricular necessity. SBC seem uniquely entrenched in their position that no child, of any age, can be opted out of iPad, EdTech or AI use, for any reason. Parents in the Borders raising important, evidence based concerns have been told that if they oppose the way SBC delivers education, they can home educate and that SBC consider the matter to be closed.<sup>20</sup> This is not a proportionate or accountable response. Local authorities have a legal duty to provide education and should ensure that the methods used to deliver it are safe, effective and free from unnecessary risk.

### **Our Requests**

Given the numerous and serious concerns outlined above, we now formally request the following:

#### **1. A Clear Right to Opt Out**

We request that SBC introduce a clear, written, authority-wide policy recognising the parental right to opt children out of SBC's EdTech and AI provision, including iPads, apps, online platforms and AI-enabled systems used within all SBC schools. *It is crucial to emphasise that, as detailed above, opting out of iPad, EdTech and AI use need not preclude children from accessing a variety of safe and educationally meaningful digital tools.*

#### **2. No Educational or Social Disadvantage**

Any child opted out must continue to receive a full, appropriate and equitable education in line with SBC's statutory duties under the Education (Scotland) Act. Children must not be disadvantaged academically or socially simply because their parents exercise evidence-based choices aimed at protecting their education, wellbeing, privacy and safety.

### **Conclusion**

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<sup>19</sup> Scottish Borders Council Inspire Learning FAQ, *Can I opt my child out of using the iPad or digital learning?*, Accessed at [this link](#) on 28 May 2026.

<sup>20</sup> Statement issued to Unplug.scot by SBC, received 29 April 2026

The above are simple and reasonable requests.

**Parents uncomfortable with intensive screen-based learning, internet based harms, AI use and the commercial processing of children' s data cannot be forced into accepting these harms and exploitations as a condition of their child(ren) accessing the education to which they have a statutory right.**

**We are not seeking to ban meaningful, safe educational technology in schools.** Our parent group includes doctors, software engineers, educators and child development professionals who are increasingly alarmed by SBC's apparent lack of caution, weak safeguards, and increasingly defensive responses to legitimate public concerns. **We are seeking parental choice, transparency, proportionality and safeguards so that intensive and insufficiently scrutinised digital practices are not imposed on young children** without meaningful oversight, consent or accessible alternatives.

We therefore urge SBC to accept the two simple requests outlined above, in line with other Scottish local authorities, and engage constructively with families rather than continuing to inaccurately characterise legitimate concerns as opposition to technology itself. We would appreciate a clear written response from SBC leadership addressing our requests.

Yours sincerely,

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## **Further Reading**

### **Learning**

Jerrim, J., Oliver, M., & Sims, S. (2018). PISA 2015: *How big is the 'mode effect' and what has been done about it?* Oxford Review of Education, 44(4), 510–528. [Full Article](#)

Delgado, P., Vargas, C., Ackerman, R., & Salmerón, L. (2018). *Don't throw away your printed books: A meta-analysis on the effects of reading media on reading comprehension.* Educational Research Review, 25, 23–38. [Full Article](#)

Sana, F., Weston, T., & Cepeda, N. J. (2013). *Laptop multitasking hinders classroom learning for both users and nearby peers.* Computers & Education, 62, 24–31. [Full Article](#)

Safescreens (2025). *Safescreens EdTech Report.* [Full Report](#)

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### **Policy & Legal**

Horvath, J. C. (2026). *Written testimony before the U.S. Senate Committee on Commerce, Science, and Transportation.* [Full Testimony](#)

Boninger, F., & Nichols, T. P. (2025). *Fit for purpose? How today's commercial digital platforms subvert key goals of public education*. National Education Policy Center, School of Education, University of Colorado. [Full Report](#)

EdTech Law Centre. *Active cases. Includes: M.C. v. Curriculum Associates; M.C. v. Google; Renaissance Learning Data Privacy Litigation; Google Data Privacy Litigation; IXL Data Privacy Litigation; Instructure Data Privacy Litigation; Z.G. v. Google LLC; SeeSaw Data Privacy Litigation; Powerschool Data Breach Litigation; PowerSchool Data Privacy Litigation*. Accessed at [this link](#) on 6 April 2026

Vernon, A. (n.d.). (2026) *EdTech in schools: A modern minefield?* Payne Hicks Beach. Accessed at [this link](#) on 31 May 2026

UK Government Early Years Screen Time Advisory Group (EYSTAG). (2026). *Screen use by children aged under 5*. Accessed at [this link](#) on 29 May 2026

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## Research – Medical

### Memory

Manwell, L. A., Tadros, M., Ciccarelli, T. M., & Eikelboom, R. E. (January 28 2022). *Digital dementia in the internet generation: Excessive screen time during brain development will increase the risk of Alzheimer's disease and related dementias in adulthood*. Journal of Integrated Neuroscience. 2022 Jan 28;21(1):28. [Full Article](#)

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### Vision and Emotional State

Barros, V. F. da S., Gomes de Oliveira, R. A. da S., Maia, R. B., et al. (November 8 2021). *Effects of the excessive use of electronic screens on vision and emotional state*. Brazilian Society of Ophthalmology. 2021;80(5):e0046. [Full Article](#)

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### Developmental Psychology

Gath, M., Horwood, L. J., Gillon, G., McNeill, B., & Woodward, L. J. (January 9 2025). *Longitudinal associations between screen time and children's language, early educational skills, and peer social functioning*. American Psychological Association. 2026 Mar;62(3):638-652. [Full Article](#)

Hing, N., Dittman, C. K., Russell, A. M., King, D. L., Rockloff, M., Browne, M., Newall, P., & Greer, N. (2022). *Adolescents who play and spend money in simulated gambling games are at heightened risk of gambling problems*. International Journal of Environmental Research and Public Health, 19(17), 10652. [Full Article](#)

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## **Media Coverage**

The Scotsman. (May 17 2026). *Schools chief vows to limit iPads in primary schools.* [Full Article](#)

The Scotsman. (September 26 2025). *Shocking revelations about extreme images on school tablets must lead to action.* [Full Article](#)

The Times. (February 14 2026). *Swedish schools said they didn't need books. Pupils proved them wrong.* [Full Article](#)

Borders Telegraph. (March 31 2023). *Concerns raised over Borders pupils accessing "inappropriate content".* [Full Article](#)

GB News. (May 15 2026). *How Sweden's 'Edtech' catastrophe became a cautionary tale for Britain's digital-first classrooms.* [Full Article](#)