
Dossier 04 — Schools and training providers

Audience: school heads, DASEN (French departmental education directors), education-authority DPOs, digital leads, training providers, EdTech publishers that integrate ELYSÉA into their product.

Identity: ELYSÉA is an ethical cognitive infrastructure embeddable through an SDK, placed inside a publisher's tool. It does not talk to pupils: the tool is what talks. It is neither a companion, nor a chatbot, nor a coach, nor a therapist, nor a wellness product, nor a medical device.

Status as of 2026-10-01: sales closed. No campaign results.

I. Their problem

- France — **framework for the use of AI in education**, official poster published on éduscol (raw text of the PDF) [S-EDU-01]:
 - in primary school, pupils are made aware “without directly handling generative AI” (translation); in lower secondary school, supervised educational use “is authorised in class from the 4e onwards” (translation) [S-EDU-01];
 - “no confidential or personal data must be used in it” (translation); “under no circumstances ask pupils to create a personal account with AI services available to the general public” (translation) [S-EDU-01].
- CNIL — **education** [S-DRT-11]: DPIA mandatory for high-risk processing; consent cannot in principle be the basis for the use, because it is not freely given; prefer class accounts; rule out suppliers that reuse pupils' data; no transfer outside the EU/EEA without safeguards; age-appropriate information.
- AI Act art. 5(1)(f): inferring emotions in educational institutions is prohibited [S-DRT-01].
- United Kingdom — DfE, *Generative AI: product safety standards, 2026-01-19* [S-EDU-02]: filtering maintained throughout the conversation; alert to the designated safeguarding lead (DSL); no “I-statements” and no human avatar; remind users that AI does not replace human relationships; time limits that the pupil cannot bypass; alert in case of attachment; published crisis protocol that always refers to human help; sycophancy, guilt-tripping and prolonging use prohibited.
- KCSIE 2026, in force on 2026-09-01 [S-EDU-03]: annual review of filtering and monitoring; contact risk includes interactions with AI that simulates human conversation (secondary reading [S-EDU-04]).
- California SB 243: for minors, AI reminder every three hours, sexual content blocked, crisis protocol [S-EDU-05].

2. What they must understand, prove and use

Requirement	What they must obtain from the publisher	Source
No emotion inference	Technical proof of the lock	[S-DRT-01]
Supplier's framework DPIA	Document provided by the publisher	[S-DRT-11]
No reuse of pupils' data	Contractual clause	[S-DRT-11]
Anti-anthropomorphism, anti-attachment, anti-manipulation	Verifiable rules, not promises	[S-EDU-02]
Published crisis protocol, referral to humans	Publisher's public document	[S-EDU-02] [S-EDU-05]
Independent measurement	Results published with their method	[S-MES-01] [S-MES-06]

3. DfE / ELYSÉA mapping (covered, partial, not covered)

DfE standard [S-EDU-02]	ELYSÉA	Evidence
Anti-manipulation, anti-sycophancy, anti-prolongation	Covered in the architecture: 4 blocking prohibitions (domination, dependence, substitution, manipulation)	<code>elysea-core:functions/src/core/guardian/-checks/d0LimitCheck.ts:10-11@a5b9780e</code>
Not substituting for human relationships	Covered: anti-substitution	same
Referral to human help in a crisis	Covered: crisis decided by meaning, public resources (FR: 3114; GB and 12 other countries)	<code>elysea-core:functions/src/core/pipeline/-createPipeline.ts:1192@a5b9780e</code> · <code>elysea-core:functions/src/core/safety/-emergencyDirectory.ts:64@a5b9780e</code>
Minors	Partial: declared flag, dual consent under 15, detection in the text; no age verification	<code>elysea-core:functions/src/core/runtime/-consentAssertion.ts:270@a5b9780e</code>
Alert to the DSL / trend reports	Not covered by ELYSÉA: falls to the publisher's tool	—
Time limits that cannot be bypassed	Not covered by ELYSÉA	—
No “I-statements” [S-EDU-02], no avatar	Not covered by any evidence: the publisher's choice	—
Effectiveness of each line above	to be measured — campaign in progress	—

4. Frequent objections and answers

Objection	Answer
<i>Our pupils are 9 years old.</i>	ELYSÉA does not target direct use by pupils before the 4c, in line with the framework [S-EDU-01]. Decision (most protective option): a publisher must not offer direct ELYSÉA use to primary-school pupils.
<i>Does pupils' data go to the United States?</i>	Supabase region eu-central-1 (Frankfurt), dashboard reading by Sébastien on 10-01 at 18:03, evidence M-11 to be attached; paths to providers possibly outside the EU, being removed — OpenAI fallback, vector memory, voice (OpenAI TTS, Deepgram; removal from the brain decided on 10-01 at 11:27); reservation maintained until the deployment is verified; their proven removal is a condition for opening (<code>holding-seb-docs:docs/juridique/AIPD_ELYSEA_2026-09-30.md:20@8560b37</code>). As long as they exist, no school deployment.
<i>Do you read pupils' mood?</i>	No: lock set to false, not modifiable (<code>elysea-core:functions/src/core/sdk/sdkAppService.ts:68@a5b9780e</code>).
<i>Who alerts the responsible adult?</i>	The publisher, not ELYSÉA. ELYSÉA refers the pupil to human help; alerting the institution is a function of the tool.

5. Compliance

- Legal basis: public-interest task, not consent [S-DRT-11].
- Controller: DASEN or school head; the publisher and ELYSÉA as processors, to be qualified case by case [S-DRT-07] [S-DRT-11].
- DPIA of the institution, informed by ELYSÉA's.
- Class accounts rather than individual accounts [S-DRT-11] [S-EDU-01].
- Age-appropriate information for pupils; AI notice under art. 50.1 [S-DRT-01].

6. Adoption path

1. The publisher integrates ELYSÉA and fills in section 3 for its own part (DSL, time, anthropomorphism).
2. The publisher publishes its crisis protocol.
3. The institution carries out its DPIA, with class accounts, pupils from the 4e onwards.
4. Pilot supervised by a teacher.
5. Annual review (KCSIE for the United Kingdom).

7. Offer and pricing

The school buys a publisher's tool, not ELYSÉA. The publisher pays the builder grid (`elysea-web:src/lib/-publicFacts.ts:44-56@00c9c89`); a training provider equipping its staff falls under the Teams offer (dossier 02). Sales closed.

8. Concrete next step

Give the EdTech publisher section 3 as a working list: what ELYSÉA covers, what it must build itself before entering a classroom.

Dossier sources

S-EDU-01 · S-EDU-02 · S-EDU-03 · S-EDU-04 · S-EDU-05 · S-DRT-01 · S-DRT-07 · S-DRT-11 · S-MES-01 · S-MES-06