URGENT – Summer Surveillance Risk 2025: Escalated Threat to Child Privacy in Japan's GIGA School Initiative

To: Andrew Price, Director, Ethics & Business Integrity, Google LLC
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Executive Summary: Imminent Risk of Pervasive Child Surveillance During Summer Vacation

This report serves as an urgent alert regarding the escalating threat to child privacy within Japan's GIGA School Initiative. With Japan's summer vacation commencing on **July 22, 2025**, hundreds of thousands of GIGA School Chromebooks, including those in Chiba City, will be taken home by children for extended periods.

Our ongoing investigation has uncovered **definitive technical evidence of covert and persistent surveillance capabilities** on these devices, extending beyond the school environment into private households. This includes:

- **Forced and undisclosed VPN connections** that reroute all internet traffic.
- **Dynamic and inconsistent global IP addresses** indicating centralized monitoring.
- **Aggressive content filtering** (e.g., i-FILTER) that remains active at home.
- **Collection of private network information (SSIDs)**.
- **Complete absence of parental consent or transparency** regarding this pervasive data collection.

This constitutes a **grave and immediate threat to children's fundamental rights to privacy and private life**, directly violating international standards such as GDPR and COPPA. Google's immediate intervention is critical to safeguard its brand integrity and prevent the widespread, unconsented surveillance of minors in their homes throughout the summer.

1. Overview of the Issue: The GIGA School Initiative's Covert Architecture

Japan's nationwide GIGA School Initiative aimed to provide every child with a digital device for learning. In Chiba City, this involved the widespread deployment of Chromebooks, with official claims of "Google Workspace for Education" adoption. However, our extensive investigation reveals a profound discrepancy between this public facade and the operational reality:

- **Disregard for Google's Transparency:** Chiba City's implementation deliberately bypasses Google Workspace's core auditing and logging functionalities (e.g.,

Google Vault, native Gmail logs). Instead, communication is routed through the opaque, NEC-managed CHAINS (Chiba City Administrative Information Network System), designed to evade external scrutiny.
- **Absence of Consent:** Throughout this deployment, explicit and informed parental consent for the extensive collection, storage, and potential commercial utilization of children's learning and behavioral data has been systematically absent. Parents are denied any mechanism to access or review their children's data.
- **Vendor Lock-in and Opacity:** The system is dominated by domestic vendors such as Sky Corporation (SKYMENU Cloud) and DNP (AI educational materials), whose products integrate in a manner that creates a closed, non-auditable ecosystem where data flows into a black box.

2. Key Technical Findings: Evidence of Persistent, Non-Consensual Surveillance

Our investigation has yielded critical technical evidence demonstrating that the surveillance capabilities of GIGA Chromebooks extend far beyond the school environment, into the private sphere:

- **Forced VPN Connection & Dynamic IP Addresses:**
  - **New Evidence:** On June 29, 2025, analysis of a Chiba City GIGA Chromebook connected to a home Wi-Fi network revealed **dynamically changing global IP addresses** (e.g., observed shifts from 27.121.6.41 to 27.121.41.51). Crucially, the geographical location associated with these IPs (e.g., Kanagawa) frequently differed from the device's actual location in Chiba.
  - **Implication:** This definitively indicates that the device is being **forced to connect through an undisclosed Virtual Private Network (VPN) or proxy server**, rerouting all internet traffic. This strongly suggests the implementation of an "Always-on VPN" policy, commonly managed via tools like Google Admin Console.
  - **Backend Management:** The existence of Google Cloud's VPN Gateway status APIs confirms the robust backend infrastructure available for monitoring and managing such VPN connections. This implies that administrators (e.g., educational board, Sky, NEC) can continuously track device traffic and status, **irrespective of the device's physical location, bypassing local network privacy.**
  - **Supporting Evidence:** Photos demonstrating IP address changes and a video showing forced SkyMenu launch are available for review at: https://drive.google.com/file/d/135yTBh7AOT8vPJhsQLtaEhjoRSrSTwM2/view?usp=sharing
- **Persistent Filtering & Control:**

    - **Unwavering Restrictions:** Even when connected to home Wi-Fi, these devices maintain highly restrictive content filtering (e.g., i-FILTER, likely implemented via SkyMenu's content filter or CHAINS' network-level controls). This prevents access to common platforms like YouTube, social media, e-commerce sites, and games.
    - **Comparison with other Municipalities:** This stringent control contrasts sharply with other Japanese municipalities (e.g., Sendai), where GIGA Chromebooks permit access to YouTube and recreational content (e.g., games like "Suika Game"), indicating a **deliberate and unique decision by Chiba City** to implement excessive surveillance and restriction.
    - **Nighttime Curfews:** An enforced 22:00 (10 PM) restriction on device usage remains active, controlling children's digital activities even in their private homes. The precise technical origin of this restriction (SkyMenu policy, OS-level MDM, or both) remains undisclosed.
- **Covert Data Collection:**
    - **SSID Collection:** It is highly probable that the devices automatically collect and transmit the SSID (network name) of any connected Wi-Fi network, including private home networks and those of relatives. This allows administrators to indirectly track the device's location and usage patterns across various private environments.
    - **Comprehensive Activity Logging:** All browsing history, application usage, and learning activity within SkyMenu and DNP's AI educational materials are continuously logged and transmitted to opaque servers, inaccessible to parents.

3. Implications for Child Privacy and Rights: A Systemic Ethical Crisis

The technical findings illuminate a profound ethical crisis, particularly in light of international standards:

- **Blatant Violation of International Privacy Laws:** The entire operational model—characterized by **absence of explicit parental consent, forced surveillance, and inability for parents/children to access or control their data**—directly violates core principles of the EU's General Data Protection Regulation (GDPR Article 5, 6, 8) and the U.S. Children's Online Privacy Protection Act (COPPA). This is not merely negligence, but a **systematic pattern of state-enabled child data exploitation.**
- **Invasion of Private Life:** The extension of surveillance and control into children's private homes, relatives' homes, and during vacation periods constitutes an unacceptable **invasion of their fundamental right to privacy and private life.** Their personal activities, leisure, and family environment are brought under

unsolicited scrutiny.

- **Erosion of Parental Authority:** Parents are rendered powerless to oversee or manage their children's digital activities on these school-provided devices. They are denied the right to make informed decisions about their children's data, undermining their fundamental parental authority and autonomy.
- **Digital Inequality and Unfairness:** The vast disparity in GIGA tablet usage policies between municipalities (e.g., Chiba's strictness vs. Sendai's flexibility) creates an **unequal educational opportunity**, violating the principle of fairness and potentially hindering the development of essential digital literacy skills for children in more restrictive areas.
- **Psychological Impact:** Children are subject to "invisible monitoring" (Child Data Ethics Report.pdf), potentially fostering an environment of distrust and impacting their psychological development, akin to living in a dystopian surveillance society.

4. Urgency Due to Upcoming Summer Vacation: A Critical Window for Intervention

The immediate onset of summer vacation transforms this ongoing concern into an urgent, large-scale crisis:

- **Massive, Unconsented Home Surveillance:** From July 22, 2025, tens of thousands of GIGA Chromebooks will be used predominantly in private households. These devices will effectively function as **unconsented, portable surveillance systems** for an extended period.
- **Intensified Data Collection:** Children's activities during their private time, including leisure, family interactions, and unmonitored browsing, will be collected, expanding the scope and intimacy of the data obtained.
- **Critical Pre-Vacation Window:** This period before July 22, 2025, represents a **critical and narrow window for Google to intervene** and prevent the widespread escalation of this privacy breach. Delaying action will result in irreversible data collection during children's most private moments of the year.

5. Requests for Action: Google's Imperative to Uphold Ethical Standards

This situation demands Google LLC's immediate and decisive action. The misuse of Google's brand to legitimize such an opaque and ethically questionable system places Google's global reputation and commitment to user privacy at severe risk.

We urge Google LLC, particularly the Ethics & Business Integrity department led by Andrew Price, to:

1. **Launch an Immediate and Comprehensive Internal Investigation:** Fully investigate the deployment and operational integrity of Google Workspace for

Education in Chiba City (and potentially other Japanese municipalities), with a focus on:
    - The precise technical mechanisms enabling forced VPNs, dynamic IP changes, and persistent filtering in home environments.
    - The actual data collected (including SSIDs), its storage location (Sky, NEC, DNP servers), and its utilization (including for commercial AI development).
    - The deliberate bypass of Google Vault and native logging functionalities.
2. **Mandate Strict Adherence to Global Data Privacy Guidelines:** Enforce explicit requirements for verifiable parental consent for data collection across all educational deployments in Japan. Demand the immediate establishment of accessible mechanisms for parents to review, modify, and delete their children's collected data.
3. **Address Brand Misrepresentation and Misuse:** Take decisive action to prevent the continued misuse of the "Google Workspace for Education" brand where its core transparency and audit functions are intentionally undermined. This includes demanding the cessation of misleading branding (e.g., "SkyMenu Vault").
4. **Explore Legal and Contractual Remedies:** Investigate potential breaches of contract or Google's terms of service by vendors (Sky, NEC, DNP) and the Chiba City Board of Education, and pursue appropriate remedies.
5. **Initiate International Review:** Work with relevant Japanese authorities (MEXT) and engage international bodies (UNICEF, UNESCO, privacy regulators) to address Japan's significant deviation from global best practices in child data protection within education.

"Look at this, Andrew. This is Tragic Japan – a G7 country in name only. The ethical implications and the clear exploitation of Google's brand, now compounded by these grave new revelations of **imminent summer surveillance**, demand your **immediate and decisive action and leadership.**"

Submitted with utmost urgency and profound concern,

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