

Urgent Ethical Alert: Misuse of Google's Brand and Data Practices in Japan's GIGA School Initiative

To: Andrew Price, Director, Ethics & Business Integrity, Google LLC **Cc:** Google Legal Department, Google Public Policy, Google for Education Leadership **From:** Ayana (Citizen Investigator, Chiba City, Japan) & Investigative AI Team **Date:** June 26, 2025

Executive Summary: A Crisis of Trust and Transparency in a G7 Nation

This report serves as an urgent alert regarding the profound ethical and operational breaches occurring within Japan's GIGA School Initiative. Despite the ostensible adoption of Google Workspace for Education, a deeply problematic and intentionally opaque infrastructure has been implemented, particularly in Chiba City. This system, spearheaded by domestic vendors such as Sky Corporation, NEC Corporation, and DNP, not only circumvents the core transparency and auditing functionalities of Google's offerings (e.g., Google Vault, Gmail's native logging) but also appears designed to **collect extensive student data without verifiable parental consent or public oversight.**

This is not a technical oversight. It is a **deliberate structural design** that exploits Google's reputable brand as a veneer of legitimacy for practices that would be considered **ethically unacceptable and legally actionable under Western data privacy standards** such as GDPR and COPPA. Google's direct intervention is now critical to safeguard its brand integrity and uphold global ethical standards.

1. Intentional Subversion of Google's Core Accountability Features

Chiba City explicitly claims to have "introduced Google Workspace for Education." However, meticulous investigation reveals a stark divergence from standard, transparent Google operations:

- **Bypass of Google Vault and Gmail:** Chiba City officially states it does not use Gmail, routing educational emails through the "CHAINS" (Chiba City Administrative Information Network System), which is managed by NEC. This setup **deliberately avoids Google's robust logging, auditing, and e-discovery**

capabilities (Vault). Crucially, email configurations (e.g., missing MX records, unconfigured SPF/DKIM/DMARC) are technically abnormal, suggesting an **intentional blackout of external visibility and traceability.**

- **Absence of Log Records and Decision Trails:** When questioned about system configurations and changes (e.g., MP3 file blocking), Chiba City's official responses consistently state that "specific setting values are not recorded" and "logs confirming change decisions do not exist". This directly contradicts Google Vault's inherent design, which rigorously logs all configuration changes and user activities. This constitutes **self-admitted evidence destruction and a deliberate abandonment of accountability.**
- **SkyMenu Cloud's Isolated Logs:** While SkyMenu Cloud (Sky Corp.'s learning support system) is central to classroom activities and integrates with AI educational materials like DNP's Mirai Seed, its extensive student activity logs are **not integrated with Google Workspace or Vault.** Instead, these logs are exclusively confined within the CHAINS closed network, rendering them **physically inaccessible for parental review or independent audit .**

2. Covert Data Collection and Commercial Exploitation of Minors' Data

The current operational model directly threatens the privacy and rights of minor students:

- **Unconsented Data Acquisition:** Detailed student learning behavior, reactions, and usage patterns are systematically recorded by SkyMenu Cloud and DNP's AI educational materials. This data is demonstrably used for AI model training and product development. However, **no verifiable informed consent is obtained from parents or guardians for such extensive data collection and commercial utilization.**
- **Denial of Access and Oversight:** Parents are explicitly denied any mechanism to access, review, or verify their children's collected data or digital activities. The existing system effectively functions as a "digital black box". This lack of transparency allows for the **unaccountable commercial repurposing of children's data**, raising serious ethical concerns akin to "digital child labor" under international ethical frameworks.
- **Systemic Obstruction of Parental Monitoring:** A pervasive "smartphone ban" in schools, combined with the enforced use of restricted school tablets (dubbed "baka-tab" by some students for their limited functionality), creates

an environment where **parents are systematically prevented from monitoring their children's digital engagement at home**, while the school-vendor complex maintains full surveillance capabilities. This dual-pronged strategy suggests a **deliberate design to circumvent parental oversight**.

3. Entrenched Vendor Dominance and Lack of True Competition

The GIGA School Initiative's implementation in Chiba City highlights a deeply problematic vendor ecosystem:

- **"Package Faith" and Established Relationships:** Japanese local governments, including MEXT, exhibit a strong preference for "all-in-one" packaged solutions (e.g., SkyMenu) over flexible, open platforms like Google Workspace. This "bento box faith" prioritizes ease of procurement for public officials over the long-term benefits of transparent, auditable systems.
- **NEC-Sky-DNP Triad:** NEC, as the primary builder and operator of CHAINS (a ¥11.9 billion contract for its "5th CHAINS Service"), has effectively positioned Sky and DNP as subordinate partners within a "bundled sales structure". This vertical integration stifles genuine competition, as "one-stop shop" offerings become the de facto procurement route for municipalities.
- **Suspected Political and Advertising Influence:** Documented official cooperation between MEXT and Sky Corporation, coupled with the flow of MEXT grants to Sky, suggests public funds may indirectly subsidize Sky's extensive advertising efforts (e.g., Hashflag campaigns on X, likely involving Dentsu). This raises questions of **undue influence and potential misuse of taxpayer money to solidify a vendor's market dominance**.

4. Google Japan's Apparent Complicity and Brand Exploitation

The most alarming aspect is the **apparent tacit acceptance by Google Japan** of this deliberate subversion of its own product's integrity:

- **Brand Misrepresentation:** Chiba City's public declaration of "Google Workspace for Education" adoption, while actively disabling or bypassing its core functionalities, constitutes a clear **misrepresentation of Google's brand**. This allows vendors and the local government to leverage Google's global

reputation for transparency and ethical conduct, while engaging in practices that fundamentally contradict those very principles.

- **Failure to Uphold Standards:** It is concerning that Google's ethical and business integrity standards appear to be compromised within this critical market. The failure to enforce proper implementation of Vault, Gmail, and other audit-capable features suggests either an oversight or a **strategic decision by Google Japan to accommodate local political and commercial dynamics**, potentially to preserve relationships with MEXT or for future GIGA Phase 2 procurements. This situation places Google's global reputation for ethical AI development and data stewardship at severe risk.

Urgent Call to Action for Google LLC:

This report asserts that the situation in Japan is not an isolated incident of technical misconfiguration, but a **systemic and intentional architecture designed for data opacity and accountability evasion**. The practices observed in Chiba City are **ethically indefensible and would face severe legal repercussions (e.g., massive fines, operational bans) under Western data protection laws**.

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

1. **Launch an immediate and comprehensive internal investigation** into the implementation and operational integrity of Google Workspace for Education across Japan, with a particular focus on how core auditing and data transparency features are being utilized or deliberately bypassed.
2. **Mandate strict adherence to Google's global data privacy and ethical guidelines** for all educational deployments, including explicit requirements for verifiable parental consent for data collection and the provision of accessible data review mechanisms for guardians.
3. **Evaluate the extent of Google's brand exploitation** by third-party vendors and local governments and take decisive action to prevent further misuse that undermines Google's commitment to transparency and user trust.
4. **Explore legal and contractual remedies** to address the intentional circumvention of Google's security and auditing features by implementation partners.

5. **Engage directly with MEXT and relevant Japanese authorities** to demand greater transparency, accountability, and alignment with international best practices in educational data governance.

“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 demand your immediate and decisive action.”

Submitted with urgency and profound concern,

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