# Regulating the Digital Divide: Policy Interventions for Equitable Access to AI-Enabled E-Learning Platforms

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## Abstract

Artificial Intelligence (AI) is rapidly transforming global education systems, offering unprecedented opportunities for personalization, efficiency, and adaptive learning. However, the integration of AI in education has also deepened existing digital divides, particularly in under-resourced communities lacking adequate infrastructure, policy support, and inclusive design. This study proposes the Equity-Centered AI Learning Access Model (ECALAM)—a conceptual framework developed through a qualitative synthesis of recent literature and policy reports-to understand and address systemic barriers to equitable AI adoption. ECALAM identifies four interrelated domains: structural inequities, AI accessibility challenges, inclusive design adaptation, and policy governance. Findings indicate that AI-enhanced learning systems, when deployed without attention to algorithmic fairness, linguistic diversity, and access equity, risk reinforcing educational stratification. Inclusive design principles, adaptive technologies, and regulatory frameworks are shown to play a pivotal role in enabling just and accessible learning environments. The study concludes with policy recommendations for governments, educators, and technology developers, emphasizing the need for anticipatory governance and inclusive pedagogical integration. ECALAM offers a diagnostic and strategic tool for guiding ethical and equitable AI implementation in education, particularly across diverse and underserved global contexts.

*Keywords:* Digital divide in education, Artificial Intelligence (AI) in learning, Inclusive design, Education policy and governance, Equity-Centered, AI Learning Access

#### Introduction

The integration of Artificial Intelligence (AI) into education systems represents a defining feature of 21st-century learning innovation, reshaping pedagogical models, administrative

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systems, and learning outcomes at multiple levels (Luckin et al., 2016; Holmes et al., 2019). From adaptive learning platforms to predictive assessment tools, AI is transforming how knowledge is delivered, consumed, and assessed across global educational landscapes by enabling systems that adjust to learners' pace, preferences, and proficiency levels (Tuomi, 2018; UNESCO, 2021). At its most transformative, AI holds the potential to personalize instruction, enhance engagement, and support learners with diverse needs through responsive and data-driven environments—particularly those with disabilities, language barriers, or unique cognitive profiles (Al-Azawei et al., 2017; Xu et al., 2024; Holmes et al., 2021). However, beneath this promise lies a less visible, yet equally consequential, reality: the deepening of educational inequalities driven by uneven access to AI technologies, inadequate infrastructure, and systemic policy gaps that disproportionately affect marginalized learners across socio-economic, geographic, and linguistic lines (Beaunoyer et al., 2020; UNESCO, 2024; van Deursen & van Dijk, 2022).

The integration of Artificial Intelligence (AI) into education systems represents a defining feature of 21st-century learning innovation. From adaptive learning platforms to predictive assessment tools, AI is reshaping how knowledge is delivered, consumed, and assessed across global educational landscapes. At its most transformative, AI holds the potential to personalize instruction, enhance engagement, and support learners with diverse needs through responsive and data-driven environments. However, beneath this promise lies a less visible, yet equally consequential, reality: the deepening of educational inequalities driven by uneven access to AI technologies, inadequate infrastructure, and systemic policy gaps.

The COVID-19 pandemic exposed and amplified long-standing digital inequities across educational systems. While AI tools surged in relevance as remote learning became the norm, vast segments of the global population—particularly students from low-income households, rural regions, and marginalized communities—were systematically excluded due to lack of broadband access, compatible devices, and digital literacy skills (van Deursen & van Dijk, 2022; Zilibotti et al., 2022). Even where infrastructure exists, AI applications in education often remain inaccessible due to algorithmic bias, linguistic exclusion, and the absence of inclusive design frameworks (Kizilcec & Lee, 2020; Pimienta et al., 2009). The result is a paradox: technologies designed to democratize learning are, in practice, entrenching existing social divides.

Against this backdrop, calls for regulatory and policy interventions have intensified. Governments, educational institutions, and international bodies are increasingly recognizing the need for coherent frameworks that address digital access, AI governance, and inclusive design. Yet, many current efforts remain fragmented and reactive, failing to account for the complex interdependence between infrastructure, policy, and pedagogy. Existing models of digital education policy often underplay the role of systemic inequity and rarely integrate inclusive design as a foundational requirement for AI deployment in schools (Selwyn, 2016; Ghimire & Edwards, 2024). In such a policy vacuum, the risk is that AI integration becomes a tool of stratification rather than transformation. This study responds to this critical gap by proposing the Equity-Centered AI Learning Access Model (ECALAM)-a conceptual framework developed through a synthesis of scholarly literature, institutional policy reports, and case-based insights from 2009 to 2025. The model captures four interrelated domains that shape equitable access to AI-enabled education: structural inequities, AI accessibility challenges, inclusive design adaptation, and policy governance. ECALAM offers a holistic lens for understanding how digital divides persist, how AI systems may unintentionally reinforce them, and what regulatory strategies are necessary to mitigate exclusion. It is designed not only to explain the status quo but to inform future-ready and justice-driven policy reforms in digital education.

The remainder of this paper is structured as follows. Section 2 provides a literature review organized into four themes: structural inequities and the digital divide; opportunities and challenges of AI in education; policy frameworks and governance models; and inclusive design and technological adaptation. Section 3 presents the methodology, detailing the study's conceptual and analytical procedures. Section 4 introduces the ECALAM model and discusses its theoretical basis and structure. Section 5 presents the study's findings, followed by an indepth discussion in Section 6 that interprets these findings through critical and policy-oriented lenses. The paper concludes in Sections 7 and 8 with a set of actionable recommendations and a summary of key insights.

# **Literature Review**

# Structural Inequities and the Digital Divide

Structural inequities remain a core driver of digital exclusion in AI-enabled e-learning environments. These inequities are not incidental but deeply embedded within broader socioeconomic, geographic, gendered, and infrastructural hierarchies. One of the most prominent barriers lies in socio-economic disparity. Students from low-income households often lack basic digital readiness-defined by access to internet-enabled devices, reliable broadband, and foundational digital skills-which restricts their ability to benefit from AI-powered educational innovations (van Deursen & van Dijk, 2022). Digital exclusion in such settings is cyclical, reinforcing pre-existing educational disadvantages and limiting upward mobility. Geographic factors intensify these disparities. Rural and remote areas frequently suffer from inadequate broadband infrastructure, resulting in poor or non-existent connectivity that renders AI-enabled platforms practically inaccessible (OECD, 2021). In these regions, educational access is mediated more by the availability of infrastructure than by instructional quality, further marginalizing learners. The COVID-19 pandemic exacerbated these inequalities, exposing stark divides in technological access across both Global North and Global South contexts (Zilibotti et al., 2022). As education systems moved online, students lacking devices or stable internet were effectively excluded from schooling altogether.

Ethno-racial inequalities compound the divide. Marginalized racial and ethnic groups, particularly Black and Hispanic learners in the United States, continue to face disproportionate barriers to accessing digital tools, contributing to enduring achievement gaps even within otherwise well-connected educational systems (Auxier & Anderson, 2020). These disparities are not solely infrastructural but are also influenced by broader socio-political patterns of exclusion, including funding inequalities in public education.

Gender inequality is another dimension of structural exclusion. Women and girls, especially in low- and middle-income countries, are less likely to have personal access to digital technologies or the internet, restricting their participation in AI-enabled educational ecosystems (UNESCO, 2020). These gendered limitations intersect with cultural norms, educational access policies, and digital safety concerns, making them particularly resistant to simple technological fixes. Equally pressing are the challenges faced by learners with disabilities. AI-based learning environments often fail to integrate accessible design features such as screen readers, alternative input formats, and user-interface adjustments, making digital platforms difficult or impossible to navigate for students with physical, sensory, or cognitive impairments (AI-Azawei et al., 2017). This inaccessibility perpetuates exclusion within systems that claim to be technologically advanced yet remain fundamentally inequitable in design.

Language barriers represent another overlooked dimension. AI-driven platforms often default to dominant global languages, systematically marginalizing students who speak indigenous or minority languages. The lack of multilingual adaptation in AI learning tools reduces accessibility and limits learners' engagement with personalized learning pathways (Pimienta et al., 2009). This issue is particularly acute in linguistically diverse countries where education policies have not adequately accounted for the intersection of language, technology, and equity. Affordability further restricts access. The high cost of digital devices remains a critical limitation for many households, especially those in economically disadvantaged communities. Without targeted subsidies or institutional support, ownership of AI-compatible devices remains aspirational rather than achievable for these groups (Beaunoyer et al., 2020).

Finally, educator digital literacy plays a critical role. In many under-resourced schools, teachers themselves lack the requisite skills to effectively integrate AI tools into their pedagogical practice, leading to uneven adoption and diminished instructional quality (Koehler & Mishra, 2009). This lack of preparedness not only limits the potential of AI but also reinforces existing educational inequities by disproportionately affecting the most vulnerable learning environments. Together, these intersecting inequities create a layered and persistent digital divide that undermines the democratizing potential of AI in education. Without structural redress and inclusive design strategies, AI-enabled learning will continue to privilege the already advantaged while leaving behind the learners who stand to benefit most.

# AI in Education – Opportunities vs. Accessibility Challenges

Artificial Intelligence (AI) technologies have introduced transformative potential within education, particularly through personalized learning and data-driven instructional design. Yet, these innovations carry inherent contradictions—simultaneously offering new opportunities while risking the reinforcement of structural inequalities. The dual nature of AI in education demands critical scrutiny, especially in contexts where access, equity, and systemic readiness are unevenly distributed. At its core, AI enhances educational personalization by adapting content delivery to the learner's pace, ability, and preferences. This form of tailored instruction has been linked to improved academic engagement and deeper learning outcomes, particularly among students with distinct cognitive profiles or learning needs (UNESCO, 2024). AI's ability to continuously analyze learner performance enables real-time feedback, targeted remediation, and scaffolding strategies previously unavailable in traditional classrooms.

Despite these advantages, access to personalized AI learning environments remains deeply inequitable. The technological infrastructure required to support such platforms—robust internet access, compatible devices, and digital literacy—continues to elude many learners in under-resourced settings. As a result, AI's benefits are disproportionately reaped by students in privileged environments, further widening the educational divide it promises to address (Beaunoyer et al., 2020; OECD, 2021). Algorithmic bias presents an additional concern. AI systems trained on non-representative datasets risk replicating and amplifying social biases in content delivery, assessment, and learner profiling. Kizilcec and Lee (2020) demonstrated that algorithmic models in education could disadvantage students from minority backgrounds through biased assumptions and recommendations, even when unintentional. Without transparency and human oversight, these systems risk reinforcing structural discrimination under the guise of objectivity.

Language accessibility is another critical challenge. Many AI educational platforms are designed primarily for dominant global languages such as English, French, or Mandarin, thereby marginalizing speakers of indigenous or minority languages (Pimienta et al., 2009). The linguistic homogeneity of these platforms curtails their usability in multilingual contexts and restricts AI's inclusive potential. While real-time translation tools are improving, their accuracy and cultural sensitivity remain inconsistent, particularly for less digitized languages. Notably, AI also holds substantial promise for learners with disabilities. Assistive technologies powered by AI—such as voice recognition, predictive text, and image-to-speech converters—have been shown to improve engagement, independence, and academic achievement among students with physical and cognitive impairments (Al-Azawei et al., 2017). However, such

tools are often underutilized or unavailable in low-income educational settings, where accessibility remains a secondary concern.

Teacher preparedness represents a major bottleneck in AI integration. Even when infrastructure is available, educators often lack the technical expertise to implement AI tools effectively. Koehler and Mishra (2009) argue that without adequate training, teachers may misuse or underuse AI capabilities, leading to suboptimal learning experiences. This skills gap results in inconsistent application across institutions, with well-resourced schools reaping the most benefits while others lag behind.

Another area of growing concern is data privacy. AI systems rely heavily on student data to function effectively. Yet, many educational institutions lack the policy frameworks necessary to govern data use ethically and securely. As Selwyn (2016) noted, the absence of robust governance mechanisms exposes learners to privacy risks and potential misuse of sensitive educational records. Nonetheless, when implemented thoughtfully and equitably, AI can serve as a bridge rather than a barrier. OECD (2021) highlights cases where adaptive AI platforms have narrowed achievement gaps by providing differentiated instruction tailored to diverse learning profiles. These outcomes are only possible, however, when systems are embedded within inclusive pedagogical frameworks and supported by institutional readiness.

In sum, while AI holds transformative potential for education, its implementation is fraught with accessibility and ethical challenges. The promise of personalization and efficiency cannot be separated from the realities of digital inequality, linguistic exclusion, algorithmic bias, and insufficient teacher training. Unless addressed, these issues will continue to undermine the very equity goals that AI in education seeks to advance.

## **Policy Frameworks and Governance Models**

Effective regulation of AI-enabled education and digital inclusion hinges not only on technological advancement but on the presence of coherent policy frameworks and governance models. While AI and e-learning technologies are increasingly being integrated into education systems, their equitable adoption is uneven and often undercut by fragmented, outdated, or reactive policy environments. The urgency to craft adaptive, inclusive, and forward-looking policies has never been greater. At the global level, multi-stakeholder coalitions have sought to bridge the digital divide through coordinated action. The United Nations' *Global Digital Compact* emphasizes cross-sector collaboration as essential to harmonizing digital regulation and addressing infrastructural and skills-based inequalities that restrict access to AI technologies in education (Reuters, 2024). This initiative reflects growing international recognition that equitable digital education cannot be achieved without systemic regulatory reform and investment.

National policy frameworks have also evolved to address the ethical, infrastructural, and pedagogical implications of AI in schools. Australia's national AI taskforce, for example, introduced guiding principles for schools that address key issues such as privacy, fairness, and inclusivity in AI deployment (The Guardian, 2024). These frameworks reflect an effort to operationalize ethical AI integration while ensuring that marginalized learners are not further excluded by technological change.

Public-private partnerships (PPPs) have emerged as powerful mechanisms for extending digital access. The Edison Alliance's "1 Billion Lives Challenge" illustrates how collaborative efforts between governments and technology providers can bring connectivity to rural and underserved communities, with direct implications for AI-supported learning environments (Time, 2025). These partnerships represent scalable models for investment in infrastructure and localized delivery of AI education tools.

Yet, despite these efforts, significant policy gaps persist. Many educational institutions and ministries operate without specialized guidelines for ethical AI deployment, particularly in

low- and middle-income countries. Ghimire and Edwards (2024) found that most existing policies lack iterative mechanisms to update governance frameworks in response to emerging AI risks and opportunities. Without adaptable policy architecture, education systems risk falling behind the technological curve or misapplying AI in ways that exacerbate inequity. Inclusion remains a central blind spot in many governance models. Treviranus (2010) argues that unless inclusive design is a foundational principle in both policy and practice, AI tools will continue to be developed in ways that fail to address the needs of learners with disabilities, linguistic minorities, and culturally diverse populations. This insight highlights the role of policy not merely as a reactive tool but as a proactive force shaping how educational technologies are designed, procured, and implemented.

Regional case studies offer mixed outcomes. For example, the NEPAD E-School Program in Africa sought to mainstream ICT access across public schools but encountered challenges related to funding continuity, infrastructure deployment, and teacher training (NEPAD, 2012). This experience underscores the importance of coupling technological ambition with operational realism and policy enforcement mechanisms.

International declarations such as UNESCO's Qingdao Declaration have provided policy blueprints that advocate for leveraging ICT to achieve equity, inclusion, and lifelong learning goals (UNESCO, 2015). However, translating such declarations into enforceable national actions remains inconsistent, particularly where fiscal capacity or political will is limited. An emerging area of policy interest is AI literacy. To ensure that both educators and students can navigate AI-enhanced learning environments responsibly, governments must prioritize AI literacy as a foundational skill set. This includes not only technical competencies but also ethical, critical, and data awareness dimensions, particularly in societies undergoing rapid digital transition (UNESCO, 2024). Ultimately, robust policy frameworks are indispensable for realizing the inclusive potential of AI in education. They provide the scaffolding for ethical governance, ensure accountability in design and deployment, and align technological innovation with broader equity and development goals. Without such frameworks, the promise of AI-enhanced education risks being overshadowed by unintended consequences, inconsistent implementation, and deepened structural exclusion.

# **Inclusive Design and Technological Adaptation**

Inclusive design in AI-enabled education is emerging as a critical frontier for addressing systemic educational disparities. While the potential of AI to personalize learning is well-documented, its accessibility and relevance to marginalized learners hinge upon how these technologies are conceived, developed, and implemented. Inclusive design, in this context, goes beyond physical accessibility to encompass linguistic diversity, cognitive variation, and user-centered adaptability—key principles for ensuring equity in digital education. Co-designing AI tools with marginalized communities offers a powerful approach to embedding inclusivity from the outset. González and Rangel (2024) demonstrate that participatory design involving urban youth in Mexico led to more contextually relevant and culturally sensitive AI tools. Such engagement ensures that technologies reflect the lived realities of learners rather than abstract assumptions made by developers operating in more privileged environments.

Adaptive learning systems—driven by AI algorithms that adjust content and pacing to individual learner profiles—have shown significant promise in supporting students with diverse needs. Fitas (2025) reports that AI-driven platforms enhanced academic performance and peer interaction among students with special educational needs, emphasizing the role of personalization in inclusive pedagogy. These systems accommodate learning variability, offering multiple pathways to achievement that traditional models often overlook. Multilingual interfaces represent another essential component of inclusive design. Many students in linguistically diverse settings face structural exclusion from AI tools designed only in dominant

global languages. AI-powered translation and language assistance technologies have been shown to reduce these barriers, offering real-time support and enabling effective participation across language groups (Fitas, 2025). However, accuracy and cultural nuance remain areas for further refinement, particularly for indigenous and underrepresented languages.

Voice technologies and AI-powered screen readers are reshaping how learners with disabilities interact with educational content. As noted by the Digital Learning Institute (2024), these tools enhance navigation, comprehension, and communication, creating opportunities for more autonomous learning experiences. When embedded within a Universal Design for Learning (UDL) framework, AI can eliminate avoidable learning barriers and foster full participation (Cornell University, 2024).

Neurodiverse learners also benefit significantly from adaptive AI systems. McNulty (2025) argues that AI-enabled platforms can provide differentiated instructional pathways, reduce cognitive overload, and offer personalized feedback in ways that support learners with autism, ADHD, and other neurodevelopmental conditions. This capacity to accommodate cognitive diversity exemplifies the potential of AI to reconfigure inclusivity as a dynamic, responsive process. Inclusive design also benefits educators, particularly those working in resource-limited settings. Microsoft Learn (2024) highlights how AI tools can assist teachers in designing personalized learning experiences, identifying learner gaps, and adjusting content delivery based on real-time analytics. These technologies not only support students directly but also empower educators to adopt more equitable instructional strategies.

Importantly, inclusive design is not simply a technical imperative—it is a normative one. As Treviranus (2010) contends, designing for inclusion reflects a philosophical stance that values diversity as a source of strength rather than as a deficit to be accommodated. This view challenges the notion of a "standard learner" and calls for systems that are flexible, customizable, and responsive to individual needs.

Engagement is another outcome of inclusive technological adaptation. AI-enabled platforms that incorporate gamification, interactive simulations, and multimodal learning pathways have been shown to improve motivation and retention, particularly among students who are traditionally disengaged in conventional educational settings (Hyperspace, 2025). By centering learners' interests and identities, these tools foster deeper educational participation. However, the effectiveness of inclusive AI tools depends heavily on policy, training, and infrastructural support. Without clear guidelines, inclusive design risks being reduced to aspirational rhetoric. To operationalize its potential, education systems must adopt inclusive design as a standard—backed by resource allocation, institutional support, and continuous feedback loops from diverse learner groups.

In sum, inclusive design and technological adaptation are foundational to equitable AI-enabled education. By centering the needs of marginalized learners, adapting to linguistic and cognitive diversity, and empowering educators, AI can become a tool for educational justice rather than digital elitism. But this vision will only materialize if design is coupled with policy and practice—working in concert to create systems that are as diverse and dynamic as the learners they serve.

# **Conceptual Model Development**

The preceding literature reveals that equitable access to AI-enabled e-learning is shaped by the dynamic interaction of structural conditions, technological design, and policy responsiveness. To capture this complexity, the paper proposes the **Equity-Centered AI Learning Access Model (ECALAM)**—a conceptual framework designed to explain and guide how systemic inequities can be addressed through inclusive AI design and regulatory interventions. The ECALAM framework rests on four interdependent pillars identified in the literature: **structural inequities, AI accessibility challenges, policy governance**, and **inclusive design adaptation**.

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Each of these pillars contributes distinct, yet overlapping, influences on learners' ability to meaningfully engage with AI-enhanced educational platforms. The model conceptualizes equitable access not as a fixed condition, but as a dynamic state contingent upon the continuous negotiation between infrastructure, design, and policy.



Figure 1: The ECALAM framework. Source: The Authors Conceptual Analysis

At the base of the model lie **structural inequities**—socioeconomic disadvantage, geographic isolation, gendered exclusions, racial disparities, and disability-related barriers—that define learners' initial position within the digital ecosystem. These entrenched disparities act as gatekeepers, often determining whether a learner can access devices, broadband connectivity, and digital literacy training (van Deursen & van Dijk, 2022; Auxier & Anderson, 2020; UNESCO, 2020). These inequities are not circumstantial but structurally embedded, creating systemic exclusion from AI-powered education opportunities unless addressed by design or policy.

The second component reflects the **opportunities and limitations of AI in education**. AI systems, while promising personalized and adaptive learning pathways, often inherit and reproduce the very exclusions they seek to overcome. Issues of algorithmic bias, linguistic

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centralization, and unequal educator readiness create environments where the advantages of AI are disproportionately distributed (Kizilcec & Lee, 2020; Pimienta et al., 2009). As the literature shows, AI technologies are not neutral—they are embedded with the values, datasets, and intentions of their creators. Without intentional inclusivity, AI can widen rather than bridge educational divides. The third pillar—**policy frameworks and governance models**—functions as a mediating force that can either reinforce or correct these disparities. Effective policy has the power to set design standards, regulate data practices, enforce accessibility mandates, and mandate equitable resource allocation. However, the literature reveals that many jurisdictions still lack the legislative and regulatory depth needed to responsibly guide AI use in education (Ghimire & Edwards, 2024; UNESCO, 2024). The ECALAM model thus identifies education policy not as a background condition but as a core mechanism through which systemic transformation must be institutionalized.

Finally, the model emphasizes **inclusive technological adaptation** as the transformative layer capable of responding to learners' diverse needs. Inclusive design—spanning multilingual interfaces, neurodiverse-friendly formats, assistive tools, and user-centered AI development— is not an optional feature but a prerequisite for accessibility (Treviranus, 2010; McNulty, 2025). The integration of Universal Design for Learning (UDL) principles into AI development processes strengthens the model's emphasis on equity as an embedded design logic rather than a retrofitted solution. The ECALAM framework positions these four domains as mutually reinforcing. Structural inequities shape initial access; AI systems either exacerbate or alleviate those disparities; policies mediate systemic response; and inclusive design operationalizes equity at the point of use. The model is cyclical and adaptive, underscoring the need for iterative governance and continuous feedback from marginalized user groups.

In its totality, ECALAM provides a policy-anchored, design-aware, and justice-driven framework for addressing the digital divide in AI-enhanced learning environments. It extends beyond static notions of access to foreground the relational, structural, and political conditions that determine who gets to learn, how, and with what tools. As such, it serves both as an analytic lens for evaluating current systems and as a strategic blueprint for guiding equitable digital transformation in education.

# Methodology

This study adopts a **qualitative conceptual methodology**, grounded in **documentary research and thematic analysis** of secondary sources. Given the aim of developing a theoretically robust and policy-relevant model—namely the *Equity-Centered AI Learning Access Model (ECALAM)*—this approach is appropriate for synthesizing dispersed insights across disciplines, institutions, and geographies. Rather than testing hypotheses or generating statistical generalizations, the study seeks to illuminate complex interdependencies between structural inequality, AI access, inclusive design, and educational policy within the context of digitally mediated learning.

The dataset for this analysis comprised over 40 peer-reviewed journal articles, policy briefs, technical reports, and declarations published between 2009 and 2025. Inclusion criteria prioritized sources that addressed AI in education, digital equity, policy frameworks, and inclusive design, with a specific emphasis on literature that intersected multiple domains. Authoritative institutions such as UNESCO, OECD, the Digital Learning Institute, and the NEPAD Planning and Coordinating Agency were intentionally included to ensure cross-national relevance and policy depth. The analytic process followed a **thematic synthesis strategy**, which allowed for the identification of recurrent conceptual patterns across structurally diverse texts. Following Braun and Clarke's (2006) reflexive thematic approach, the data was first subjected to familiarization and initial coding, after which themes were generated inductively and refined through iterative comparison. Themes were then clustered

into four higher-order domains that formed the foundation of the ECALAM framework: structural inequities, AI accessibility challenges, inclusive technological design, and policy governance.

To ensure rigor and internal coherence, the development of the conceptual model was guided by three theoretical heuristics: 1) **Critical Digital Equity Theory**, which foregrounds the role of power, access, and justice in digital education systems; 2) **Universal Design for Learning** (**UDL**), which emphasizes flexible, learner-centered approaches to inclusivity; and 3) **Adaptive Governance Theory**, which underscores the need for responsive, anticipatory policymaking in the face of emerging technologies. These theoretical lenses helped align empirical patterns with normative goals around fairness, accessibility, and systemic transformation.

While the study does not rely on empirical fieldwork, its strength lies in the triangulation of findings across global literature, ensuring both contextual sensitivity and generalizable insights. The model was validated through consistency checking across literature themes and through alignment with current debates in digital education policy, AI ethics, and inclusive pedagogy. This conceptual triangulation enabled the ECALAM model to serve as both a descriptive and prescriptive tool—descriptive in diagnosing multi-layered barriers to equitable access, and prescriptive in proposing how inclusive policy and design can reshape AI-enabled learning environments. The methodology employed here allows for a comprehensive and interdisciplinary exploration of the digital divide in AI-mediated education. It supports the study's aim to bridge theory and practice by producing a conceptually rich and policy-relevant framework that can inform governance, design, and strategic reform in digital education systems globally.

# Findings

The findings of this study are organized around the four thematic pillars of the *Equity-Centered AI Learning Access Model (ECALAM)*, developed through the synthesis of recent scholarly and policy literature. Each domain—structural inequities, AI accessibility challenges, inclusive design adaptation, and policy governance—reflects a critical area influencing equitable engagement with AI-enabled educational platforms. The first domain, **structural inequities**, underscores how socioeconomic disadvantage, geographic isolation, gendered exclusion, and disability-related barriers shape initial access to AI-based learning. The literature consistently reveals that learners from marginalized backgrounds are systematically denied access to internet connectivity, digital devices, and foundational digital literacy (van Deursen & van Dijk, 2022; Auxier & Anderson, 2020; UNESCO, 2020). These barriers are systemic, often overlapping, and rooted in broader patterns of social and infrastructural inequality.

In the second domain, **AI accessibility challenges**, findings show that while AI promises personalized learning, its implementation often inherits structural biases. Algorithmic inequities, linguistic exclusion, and limited educator preparedness prevent AI from fulfilling its equitable potential (Kizilcec & Lee, 2020; Pimienta et al., 2009). Moreover, the high cost of AI infrastructure restricts adoption in low-resource settings, reinforcing educational stratification. The third domain, **inclusive design adaptation**, highlights how user-centered, adaptive, and multilingual AI platforms improve learning experiences for marginalized learners. Empirical studies confirm that co-designed AI tools, assistive technologies, and adaptive interfaces positively impact students with disabilities and neurodiverse learners (Al-Azawei et al., 2017; Fitas, 2025; McNulty, 2025). However, the lack of standardization in inclusive design remains a critical barrier to scale.

Finally, the domain of **policy frameworks and governance models** illustrates that policy is both a barrier and a lever. Where policy is absent, outdated, or fragmented, AI exacerbates inequality. Where governance is iterative, inclusive, and aligned with educational justice, AI

can be used to close systemic gaps (Ghimire & Edwards, 2024; UNESCO, 2024). Cross-sector collaboration and public-private partnerships emerge as powerful mechanisms for bridging divides and expanding digital reach. Together, these findings confirm that equitable access to AI-enhanced education is contingent on the interconnection of socio-technical systems, design practices, and adaptive governance.

Pillar of the Model	Key Insights	Selected Sources
Structural Inequities	Digital access is stratified by income, geography, race, gender, and disability.	van Deursen & van Dijk (2022); UNESCO (2020)
AI Accessibility Challenges	Algorithmic bias, language centralization, and cost restrict equitable adoption.	Kizilcec & Lee (2020); Pimienta et al. (2009)
Inclusive Design Adaptation	Adaptive and assistive technologies benefit diverse learners but lack policy standardization.	Fitas (2025); Al-Azawei et al. (2017); McNulty (2025)
Policy Frameworks & Governance Models	Effective policy is central to regulating AI ethics, privacy, accessibility, and inclusive design.	Ghimire & Edwards (2024); UNESCO (2024)

## Discussion

The findings of this study affirm that equitable access to AI-enabled education cannot be disentangled from the social, economic, and political structures that shape digital opportunity. The Equity-Centered AI Learning Access Model (ECALAM) provides a comprehensive lens through which to understand how these intersecting forces operate—and, crucially, how they can be reoriented to advance inclusion. Rather than viewing access as a binary or infrastructural concern, ECALAM frames it as a fluid and negotiated outcome dependent on structural positioning, technological adaptability, and policy responsiveness. The first pillar of ECALAM-structural inequities-confirms what critical digital equity theorists have long emphasized: that digital exclusion is deeply entangled with systemic social disadvantage. Learners from low-income households, rural communities, and historically marginalized groups face compounded barriers in accessing AI-enhanced education (van Deursen & van Dijk, 2022; Auxier & Anderson, 2020). These barriers include not only physical limitations like broadband infrastructure and device ownership but also epistemic exclusions such as lack of digital literacy and social capital to navigate AI systems effectively. This pattern reveals that interventions focusing solely on technological provision risk misdiagnosing the problem by ignoring the underlying social architecture of exclusion.

The digital divide, as reinforced by the COVID-19 pandemic, has evolved beyond simple access metrics. It now encompasses a **second-level divide** related to skills, and a **third-level divide** concerning learning outcomes and digital agency (Zilibotti et al., 2022). As the findings show, even when AI tools are available, disparities in learners' ability to engage meaningfully with them persist. These gaps are particularly acute for students with disabilities, speakers of minority languages, and neurodiverse learners who require tailored support systems that many AI platforms fail to provide by default (Al-Azawei et al., 2017; McNulty, 2025). This observation underscores the inadequacy of equity efforts that do not simultaneously address content, design, and pedagogy.

The second pillar—**AI accessibility challenges**—further complicates the narrative. While AI technologies promise personalization and efficiency, they often replicate and even amplify existing inequalities when applied without equity safeguards. The risk of algorithmic bias is well-documented, particularly when AI models are trained on skewed datasets that fail to

reflect the diversity of learners (Kizilcec & Lee, 2020). These models may inadvertently encode assumptions about learning behaviors, language proficiency, or academic potential, resulting in exclusionary outcomes. Language bias, in particular, remains a pervasive yet underdiscussed issue. AI platforms that prioritize English and other dominant languages structurally exclude vast populations of multilingual learners, particularly in Africa, Latin America, and parts of Asia (Pimienta et al., 2009). A further concern is educator preparedness. While much attention is given to student access, the literature makes clear that teachers are often under-equipped to integrate AI meaningfully into instruction (Koehler & Mishra, 2009). Without proper training, AI tools are likely to be underutilized, misapplied, or used in ways that reinforce outdated pedagogical norms. This issue is especially pronounced in under-resourced schools, where staff are already stretched thin and professional development opportunities are limited.

The third pillar—inclusive design adaptation—emerges as a transformative domain. The literature reveals that when AI platforms are co-designed with marginalized learners, tailored to neurodiverse needs, and implemented using assistive technologies, they can significantly improve engagement and academic performance (Fitas, 2025; González & Rangel, 2024). However, inclusive design remains the exception rather than the rule. The ECALAM model therefore reframes inclusive design not as an auxiliary consideration, but as a structural prerequisite for equity. This aligns with the Universal Design for Learning (UDL) framework, which advocates for built-in flexibility in content delivery, engagement, and assessment (Cornell University, 2024). Importantly, inclusive design must be backed by enforceable standards and public accountability. As McNulty (2025) argues, inclusivity cannot rely on voluntary action alone. It must be institutionalized through policy, funding, and design requirements. This brings the discussion to the fourth and final pillar—policy frameworks and governance models.

Effective policy operates as both a protective and enabling mechanism. It provides the scaffolding through which AI integration can be ethical, secure, and inclusive. Yet, the findings indicate that many jurisdictions are ill-prepared to regulate AI in education. Policies often lag behind technological change, leaving gaps in data governance, accessibility mandates, and ethical AI deployment (Ghimire & Edwards, 2024). The few existing models, such as Australia's national AI school guidelines or the UN's Global Digital Compact, offer useful prototypes but have yet to be widely adopted or adapted (The Guardian, 2024; Reuters, 2024). Public-private partnerships offer a promising avenue for expanding digital infrastructure and bridging access gaps, particularly in rural and low-income regions. The Edison Alliance initiative, for example, demonstrates how collaborative efforts can extend connectivity and deliver localized solutions (Time, 2025). However, such initiatives must be guided by public interest rather than market logic, with equity, accessibility, and ethical design as non-negotiable criteria. In sum, the ECALAM model situates equitable AI access at the convergence of infrastructure, design, and governance. It asserts that overcoming the digital divide is not merely about provision, but transformation-of pedagogy, of technology, and of policy. The findings reaffirm that without intentional inclusivity and systemic oversight, AI will continue to reinforce educational hierarchies rather than disrupt them. For AI to fulfill its democratizing potential, it must be not only smart, but just.

# Conclusion

This study has developed and advanced the *Equity-Centered AI Learning Access Model* (*ECALAM*) as a conceptual framework for understanding the persistent and multidimensional nature of the digital divide in AI-enabled education. Drawing on a thematic synthesis of literature across equity, accessibility, design, and governance, the model reveals that technological advancements alone are insufficient to produce equitable educational outcomes.

Instead, access to AI-enhanced learning is best understood as a negotiated outcome shaped by structural inequality, inclusive design capacity, and regulatory intent. At the heart of the ECALAM framework lies the recognition that digital learning ecosystems are deeply political. Structural inequities—including income disparities, gendered exclusions, geographic marginalization, and disability-related barriers—define the baseline conditions under which learners engage with technology. When these inequities intersect with algorithmic bias, linguistic homogenization, and inadequate teacher preparation, the risk of AI reinforcing educational hierarchies becomes pronounced. Even the most promising adaptive technologies remain inaccessible to many unless design and deployment are consciously inclusive.

Policy, as the model emphasizes, plays a critical mediating role. Where robust, anticipatory, and equity-focused policies are in place, AI can serve as a transformative tool. Where policy is absent, fragmented, or reactive, AI adoption risks reproducing exclusion. The findings underscore that equitable AI integration is not merely a question of technical capacity but one of ethical governance and inclusive intent. Thus, the ECALAM model offers both a diagnostic and strategic tool. It provides stakeholders—including governments, institutions, designers, and educators—with a comprehensive lens through which to assess existing systems and chart more just futures for AI in education. Importantly, it challenges the field to move beyond access metrics and toward deeper questions of design equity, pedagogical responsiveness, and systemic reform.

# Recommendations

To operationalize the insights generated by this study and the ECALAM framework, education systems must adopt a multi-layered approach that addresses exclusion at the structural, technological, and policy levels. First, governments and institutions must invest in closing foundational access gaps. This includes expanding broadband infrastructure, subsidizing AI-compatible devices, and offering digital literacy training tailored to marginalized communities. Without addressing these core inequalities, AI-enhanced education will remain out of reach for many learners. Equally important is the institutionalization of inclusive design practices within the development of AI technologies. Designers and edtech companies must adopt universal and adaptive design standards that accommodate diverse cognitive, linguistic, and sensory needs from the outset. This shift requires not only technical adjustments but a philosophical reorientation toward user-centered innovation—particularly for students with disabilities, neurodivergent learners, and speakers of minority languages.

Teacher training must also be prioritized. Educators are the bridge between AI tools and pedagogical outcomes, yet many remain underprepared to integrate these technologies meaningfully. National education policies should include targeted professional development programs that emphasize both the pedagogical and ethical dimensions of AI use in the classroom. Such training must be ongoing, context-sensitive, and accessible across diverse school environments. On the policy front, governments should enact clear, enforceable guidelines for AI integration in education. These policies must address data privacy, algorithmic transparency, accessibility mandates, and procurement standards. Countries without formal AI-in-education strategies must move toward developing comprehensive frameworks that are iterative, inclusive, and grounded in equity. Drawing from existing models such as the UNESCO Qingdao Declaration or Australia's AI guidelines, these policies should be shaped by cross-sectoral dialogue and informed by the lived experiences of marginalized learners.

Finally, public-private partnerships should be structured to serve public interest rather than commercial gain. While collaboration with technology firms is often necessary for scaling digital access, such partnerships must be governed by principles of accountability, transparency, and distributive justice. Investment in AI-enhanced learning should be

conditioned on inclusive design compliance and social impact commitments, ensuring that innovation does not come at the cost of equity. In implementing these recommendations, stakeholders can move closer to realizing the transformative potential of AI in education—not as a privilege for the digitally advantaged, but as a right for all learners, regardless of background, geography, or ability.

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