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Susan FLOCKEN

ETUCE-CSEE
Boulevard Bischoffsheim 15
1000 Brussels | BELGIUM
secretariat@csee-etuce.org
+32 2 224 06 92

ETUCE Statement on enabling factors for digital education and improving the provision of digital skills

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Background (For ETUCE member organisations only):

In the framework of the implementation of the Digital Education Action Plan and the European Education Area, the European Commission is **working on two complementary Council Recommendations on the enabling factors for digital education and improving the provision of digital skills.**

Both initiatives address **formal education levels**. The first initiative seeks to identify the **preconditions (enabling factors) needed to ensure that digital technologies benefit teaching and learning** with an overarching approach. **The second initiative aims to outline the needed actions to improve the provision of digital skills and includes a focus on teachers, academics and other education personnel.**

The two Commission's proposals are expected to be published in the first quarter of 2023 and be adopted by the representatives of member states within the Education Council in spring 2023 (Swedish Presidency of the Council of the EU). During 2022, ETUCE has been engaging with the EU Commission in several formal and non-formal consultations to ensure that the view of education trade unions is reflected in the text of the initiatives.

Regarding the initiative on enabling factors for digital education:

ETUCE welcomes the effort of the European Commission to identify the preconditions (enabling factors) to make positive use of digital technologies within education. Following extensive consultation with its members and advisory bodies, ETUCE calls on the European Commission to include the following considerations in the Proposal for a Council Recommendation:

- **Bearing in mind that preparedness and approaches to digital technologies widely vary across national, regional, and local levels both across and within European countries.** Therefore, outlining enabling factors is not only a difficult exercise, but it even risks leading to a one-size-fits-all approach which would be detrimental to teachers, students, and the quality of education alike.
- **Emphasising quality and inclusive education through digital technologies as a focus of the Recommendation.** The EU Commission asserts that, compared to traditional education, digital education has the potential to enhance the quality and inclusiveness

of education if certain preconditions are fulfilled. ETUCE does not agree with the **Commission's approach that emphasises digital education as if this was the ultimate aim and the inexorable strategy to ensure quality and inclusive education**. ETUCE recalls that the actual goal of education, in its holistic mission as a public good and human right, is to nurture the full potential of each student, while leaving no one behind. In this context, digital technologies can be, under certain circumstances, supporting tools for teachers and students within the learning processes.

- **Addressing potentials and risks of digital technologies, through the set-up of a solid regulatory framework for digital technologies including the opt-out right of digital technologies that violate the rights of teachers and students.** Deciding if and where digital tools are beneficial for teaching and learning practices must be in the hands of teachers and academics in their professional role and full respect for their professional autonomy and academic freedom. On this basis, the Commission **must duly consider that digital technologies bring about potentials and risks that can sorely affect** teachers, academics, other education personnel, and students. This is particularly relevant when digital tools consist of algorithms and artificial intelligence systems, whose impact on education lacks solid and consistent evidence and impact assessment. Addressing these risks requires building a solid **regulatory framework for digital technologies** to ensure transparency, non-discrimination, accountability, data protection, intellectual property, cyber-security, democracy, freedom of action and choice. In addition, implementing digital technologies in educational practices requires **a careful impact assessment and regular risk analysis, including teacher and student rights to opt-out of technologies**. This should be a vital right as [evidence](#) shows that education technologies continue to violate teachers' and students' rights.
- **Framing the initiative with a needs-based approach within the holistic mission of education.** In order for digital tools to contribute to quality education for all, digital education policies must be coherent with **a needs-based approach within the overall mission of holistic education**. This is crucial to foster the development of the full potential of each student while leaving no one behind. Therefore, when framing education policy strategies, **it is essential to consider digital tools as supportive tools for in-presence teaching to guarantee high-quality education to all students and preserve the invaluable social aspects of learning, particularly in primary and secondary education**. In this sense, digital tools for education must be developed and used in the best way to respond to the professional and pedagogical specific needs of students, teachers, school leaders, academics, and other education personnel, while respecting the professional autonomy and academic freedom of teaching professionals.
- **Addressing the gaps concerning access to digital infrastructures in line with a needs-based approach.** With regard to digital infrastructures, member states must ensure equal access to digital technologies and ICT tools for all teachers and students, with particular attention to the most disadvantaged groups. In this respect, ETUCE highlights that **a significant socio-economic divide at the expense of rural and poorer areas is persisting with relatively low levels of confidence of education personnel in using digital technologies in their daily work**. ETUCE calls on removing barriers to access education posed by the rationalisation of school infrastructure, both in the urban and rural areas, by investing in sustainable, low-carbon emissions, healthy and safe school buildings as well as in safe and quality digital infrastructure. For these purposes, sustainable public investment should be provided by national governments. In line with the abovementioned needs-based approach, ETUCE welcomes the

Commission's idea of **impact-focused investment** requiring that investment is effective to meet the pedagogical needs of teachers, academics, other education personnel, and students. This is particularly important as we witness increasing endeavours from the EdTech industry to convince education institutions to allocate a substantial amount of money to digital tools and software without concrete proof that these will effectively benefit educational pedagogies and the quality of education.

- **Providing effective support to teachers, academics, and other education personnel through up-to-date high-quality initial education as well as quality and accessible continuous professional development within working hours.** ETUCE welcomes the Commission's initiative to include a specific focus on supporting teachers, academics, and other education personnel. Indeed, education systems across Europe are facing a decreasing status and attractiveness of the teaching profession, which led to unprecedented teacher shortages at all levels of education. As a direct consequence, national education systems struggle to recruit and retain highly qualified teachers. **This context urges national governments to implement supporting measures to support teachers and the attractiveness of their profession. It is vital to recall that teachers stand at the core of education systems and are essential for the quality of education and the future of generations.** A detailed ETUCE's view regarding a supporting ecosystem and digital skills through quality initial teacher education and continuous professional development is extensively described later in this Statement within the section on digital skills.
- **Dropping the attempts to privatise and commercialise education and underlining the importance of sustainable public investment for quality education.** ETUCE firmly opposes the call of the EU Commission that promotes the role of EdTech in education and supports public-private partnerships. Indeed, in the last decades, the increasing push for public-private partnerships has served as a low-cost tool to have rapid injections of investment and introduce market mechanisms and business practices within education. In this regard, ETUCE stresses that quantitative-based and cost-effective approaches aimed to maximise the outcomes at the minimum cost fail to address the core value of education as a human right and a public good. Building on the [Ministerial Declaration on investment in Education](#) (2022) which recognises the advantages of allocating public funds to education, the upcoming Council Recommendation on enabling factors must call on member states to ensure sustainable quality investment in education. Member states should further respect their commitment to the [UNESCO Paris Declaration on investing in the future of Education](#) (2021) to "allocate at least 4-6% of GDP and/or at least 15-20% of total public expenditure to education".
- **Raising awareness on the impact of the EdTech industry on the values of education as a human right and public good.** Regarding the commercialisation and commodification of education, ETUCE underlines that the increasing role of the EdTech industry, favoured by the lack of regulations, **has turned education into a multimillionaire market without regard to the quality and the real needs of teachers and students.** In this respect, ETUCE remarks that the **profit-driven nature of the EdTech industry clashes, by definition, with the mission of education which is primarily a public good and a human right** and poses multiple challenges in terms of data privacy, transparency, equity and non-discrimination. Therefore, ETUCE demands that national governments do not limit their scope to regulating the EdTech sector but take on a more prominent role in developing public platforms for digitally enhanced to protect the public value of education. This should fully respect the professional

autonomy and academic freedom of teachers, academics, and education personnel as well as the autonomy of education institutions.

- **Ensuring social dialogue and sufficient time for democratic consultation as a key to an efficient whole-government approach in education.** ETUCE welcomes that this initiative **calls for a whole-government approach and closer dialogue between education institutions and relevant stakeholders.** In this respect, ETUCE remarks that implementing **an effective whole-government approach requires providing sufficient time for social dialogue** with education trade unions and **democratic consultation.** These are important preconditions to ensure the quality of education as a public good and a human right. In this context, **the Council Recommendation must emphasise the central role of social dialogue with education trade unions and collective bargaining in the design, implementation, and governance of education policies regarding digitalisation.** This is vital to foster democratic teaching and learning environments, active participation, and creative involvement of teachers and students. Therefore, **a clear call for collective agreements and collective bargaining with education trade unions must be included in the Council Recommendation** as important to ensure that the interests of teachers, academics, and other education personnel. In this context, the European cross-sectoral agreement on digitalisation should serve as a guideline for further sectoral negotiations at national, regional, and local levels on digitalisation.

Regarding the initiative on improving the provision of digital skills:

ETUCE welcomes the initiative of the European Commission to identify the necessary steps to improve the provision of digital skills to enhance the quality and inclusion of education, including a specific focus on teachers. While the abovementioned ETUCE recommendations relating to the Commission's initiative on enabling factors for digital education remain also relevant for the sake of the EU Commission's initiative on the provision of digital skills, some additional considerations are deemed necessary with regard to the latter initiative. Notwithstanding, the following recommendations complement and should be read in conjunction with the previous points on enabling factors for digital education. The below recommendation specifically focuses on the needs of teachers, academics, and other education personnel with regard to the provision of digital skills. In particular, ETUCE exhorts the Commission to:

- **Embed digital skills within the holistic mission of education and education pedagogies.** Indeed, equipping teachers, academics, and other education personnel with adequate digital skills to address the needs of a digitised society is important. At the same time, adequate digital skills **are far from providing a viable solution they constitute only one component, among many others, of a complex ecosystem to ensure good use of digital technologies and provide quality education for all.** In addition, the provision of digital skills to teachers must not constitute an aim in itself but it must be intertwined with educational pedagogies and the overall holistic mission of education.
- **Improve the quality of and update teacher initial education and accessibility and quality of continuous professional development within working hours to meet the needs of digital skills hand-in-hand with educational pedagogies and digital literacy.** ETUCE welcomes that the initiative underlines the importance of professional development and support for teachers and other education personnel.

Indeed, despite teachers and academics being willing to innovate their pedagogies, including through the use of digital technologies, they lack adequate training opportunities. On the one hand, initial education programmes are often outdated and not fit to provide teachers with adequate digital skills integrated with education pedagogies. On the other, even though the importance of continuous professional development is widely recognised, [Eurydice's data](#) shows that very few countries consider it as a right, while in the majority of cases, continuous professional development is seen as a mandatory activity or professional duty. In addition, multiple challenges exist concerning **access, finance, recognition, and quality assurance of continuous professional development opportunities (CPD)**, despite the situation widely varying across different European countries. Indeed, [TALIS 2018](#) data underlines **high costs, scheduling conflicts, family responsibility and lack of offer or support by the employer as the main challenges for continuous professional development**. Therefore, ETUCE calls on the EU Commission to include in the text of the Proposal an urgent call for member states to improve free access to and quality of CDP organised within working hours while providing adequate replacement of teachers in the classroom.

- **Refrain from reducing the value of full qualifications through a market of small certifications (e.g., MOOCs and micro-credentials)**. Indeed, while online micro-credentials and massive open online courses (MOOCs) gain momentum in the education sectors, the Proposal for Recommendation should recall the importance of ensuring the respect of national qualification requirements for pursuing the teaching profession. In this context, while digital skills can act as complementary tools for training, these should not be considered a cheap alternative to replace quality initial education and continuous professional development for teachers.
- **The fundamental values of professional autonomy and academic freedom of teachers, academics, and other education personnel in deciding if, when, and how it is more appropriate to use digital technologies in their pedagogies**. Alongside the importance of providing adequate digital skills to teachers and education personnel, it is important the education policies trust and empower teachers, academics, and other education personnel in their professional role in applying digital skills in the way these best fit their educational pedagogies and students' needs. Therefore, **professional autonomy and academic freedom** are fundamental values which must be highlighted within the Proposal for Council Recommendation.
- **Provide adequate remunerated working time for teachers, academics and other education personnel to effectively integrate digital skills in teaching and learning and foster the development of a public supportive ecosystem to ensure proper and critical use of digital technologies in education pedagogies**. While digital skills and digital technologies are usually seen as an advantage for teachers to optimise time on their tasks, the experience actually shows that proper and critical implementation of digital technologies within educational pedagogies, including the creation and selection of digital education content, requires **careful preparation and additional workload for teachers, academics and other education personnel**. This is particularly problematic considering that teachers' working time is subject to unclear definitions in many European countries. In this respect, the EU Commission should call on member states to provide adequate remunerated time to allow teachers proper working time to experiment and implement digitally enhanced pedagogies. In addition, while education systems increasingly rely on the provision and maintenance of digital infrastructure and software by private companies, adequate implementation of digitally enhanced education requires the availability of a

public supportive ecosystem made not only of digital infrastructure but also of multiple pedagogical experts and technical support staff hired as internal staff within education institutions.

- **Enhance the attractiveness of the profession through, increased salaries and improved career progression to better recruit and retain high-qualified staff, particularly in STEM subjects.** As the European Commission points to the existing shortage of teachers, academics, and other education personnel in STEM subjects such as Science Technology, Engineering and Mathematics, ETUCE underlines that recruiting and retaining highly qualified staff require improved national strategies to enhance the attractiveness and the status of the teaching profession. Therefore, it is important that the Council Recommendation calls for improved working conditions and salaries as the profession undergoes lower salaries than other professionals with the same levels of qualifications, stagnant career progression and increasing precariousness.

**The European Trade Union Committee for Education (ETUCE) represents 125 Education Trade Unions and 11 million teachers in 51 countries of Europe. ETUCE is a Social Partner in education at the EU level and a European Trade Union Federation within ETUC, the European Trade Union Confederation. ETUCE is the European Region of Education International, the global federation of education trade unions.*