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# ETUCE

## European Trade Union Committee for Education EI European Region

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### ETUCE Statement on the European Commission White Paper on Artificial Intelligence:

#### A European-wide strategy on AI must include strong safeguarding mechanisms for the education sector

*Adopted by the ETUCE Bureau on 30 March 2020*

**The digital revolution is irrevocably transforming the world of work and societies at large. The use of digital tools and artificial intelligence (AI) in increasingly more aspects of the professional and personal sphere is bringing about new opportunities to facilitate everyday life and introduces new dangers, in particular to the privacy and well-being of individuals. To ensure a smooth transition, and minimal disruption to the lives of citizens, policy-makers must regulate the use of new technologies in a holistic, sustainable, and human-centred approach, in all relevant sectors, including education.**

On 19 February 2020, the European Commission unveiled its long awaited White Paper on Artificial Intelligence, as part of a series of policy documents furthering the European Digital Strategy, including the following:

- [Communication: A European strategy for data](#)
- [Commission Report on safety and liability implications of AI, the Internet of Things and Robotics](#)
- [Communication on Shaping Europe's Digital Future](#)

The White Paper is issued at a time when policy-makers are increasingly eager to develop policies in the field of the use of digital technologies and AI<sup>1</sup>, industries and businesses are keen to boost competitiveness with these new and emerging tools, and social partners and civil society organisations warn of **the possible long term and irreversible effects of integrating them in workers, students, and citizens' lives without appropriate safeguards**. The education sector is in no small part affected by the current changes introduced by the digital era. As the recent COVID-19 crisis clearly showcases, digital education, and the use of new technologies in the educational context remain unequally accessible to educators and students alike. It is however increasingly prevalent in the societal sphere, and the implications are multi-fold: at a time where citizens are needed to master a certain level of digital skills to actively take part in the world of work but also actively engage in their communities, **they must be educated to the use of new technologies, its benefits and its dangers**. This entails that teachers and other education personnel are **adequately trained to the usage of new technologies**, in order to successfully integrate it into the curricula. At the same time, the use of technologies in to the workplace **creates emerging working conditions modifications**, and education personnel must be protected from its adverse effect.

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<sup>1</sup> At European level, the European Commission has set up a High-Level Expert Group on Artificial Intelligence that produced Ethics [Guidelines](#) for Trustworthy AI

ETUCE, as the European Trade Union Federation representing more than 11 million education personnel<sup>2</sup>, is of the opinion **that a transparent, human-centred and ethical approach to AI is vital when developing and mainstreaming AI into the public sphere**. These aspects go hand in hand, and must not be overshadowed by the race to technological innovation. **At the same time, it is crucial that provision of digital education reaches all students in view that the digital era fosters inclusion rather than perpetuates and worsens the already unacceptable levels of social inequalities**.

ETUCE is keen to contribute to this European Commission consultation by way of this Statement, and will further advocate for careful consideration when it comes to introducing AI into the private and public spheres, in particular into the education sector.

1. At the brink of a widespread technological and societal transformation, policies must be conceived in the aim that **technology serves the people**, and not the opposite. In this view, ETUCE welcomes the European Commissions' initiative, in its intention of presenting policy options to a wide range of stakeholders, and its call for a far reaching consultation. In particular, **the mention of social partners is as positive as it is essential**, due to the deep impact that Artificial Intelligence can have on the working environment and organisation.
2. While the White Paper emphasises the need for coordinated European-wide cooperation among Member States to ensure that Europe does not lag behind on research and innovation on AI in a context of 'fierce global competition', the perceived urgency **should not spark a race to the bottom**, in particular in **ethical concerns, trustworthiness, privacy, accountability, transparency and non-discrimination**.
3. While the White Paper on Artificial Intelligence advocates for close cooperation between public and private sectors in the development of AI technology, ETUCE **stresses that the implications of the development of AI is a matter of public concern, and should therefore not be subject to the risk of private interests driving AI governance**.
4. Indeed, on applications of AI involving any form of impact on human lives, ETUCE warns that these applications **should be considered as 'high-risk' applications**, and therefore be enshrined in **strong and binding regulatory framework**, designed with the meaningful consultation of all relevant stakeholders, **including social partners, with the respect human rights and dignity as the overarching principle**.
5. In particular, in the context of the application of AI in the education sector, ETUCE urges decision-makers **to consider the impact of these applications on the quality of education provided, education personnel, and students**. More specifically:
  - Too often, the education sector is subject to pressure to adapt and include new technological tools **that have not been subject to proper consultation of practitioners**. These unilateral decisions result in a loss of professional agency for education personnel. The application of AI into education, in particular in the aim to encourage personalised learning pathways, raises

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<sup>2</sup> The European Trade Union Committee for Education (ETUCE) represents 132 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.

important questions on the future of education in the digital era. Additionally, the introduction of AI into education in view to customise teaching to individual students, **for instance special needs students**, requires a **thorough reflection and understanding of these needs, and how AI technology can realistically and concretely**, contribute to fulfilling them. It is crucial that the central role of educators is acknowledged, and not understated. Education personnel are professionals trained to teach, support and guide students, and the social and emotional benefits of teacher-student interaction is a key component of education. **Educators must therefore not be reduced to mere facilitators of AI-powered instruction.** In addition, ETUCE recalls that **any technology introduced in the context of education must serve as a support to educators, and not as a replacement, nor as a mean to reduce costs.**

- The use of AI in education entails a large amount of data to be collected and analysed by AI systems. As for all collection of data in the context of the workplace, **it should be introduced in a full transparency, with clear indications as to the uses of the data, and in consultation with education personnel representatives**, so as to ensure the necessary safeguards are implemented. These safeguards should in addition be designed in view to **protect the privacy of students and education personnel, ensure non-discrimination and respect the principle of equal treatment.** In addition, the **teaching material and content that education personnel create must remain under their creators' copyright ownership in order to ensure that teachers can actively decide who they share their material with and that it is not exploited for profit by private providers without their knowledge.**
- Artificial Intelligence is foreseen to be increasingly used **in a diverse range of applications in society, pertaining to both professional and personal uses.** As such, it is crucial that **all students hold a minimum level of understanding of its functioning, uses, and potential dangers.** To this end, it is necessary that education personnel **receives the appropriate training, both when entering the profession and throughout their career, in understanding what AI is**, how it can be used in the education sector for teaching and learning purposes and **what risks it may entail for education personnel and students alike.**

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