



Education International  
Internationale de l'Éducation  
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Bildungsinternationale



ETUCE – European Trade Union Committee for Education  
Education International - European Region

#### ETUCE-CSEE

Boulevard Bischoffsheim 15  
1000 Brussels | BELGIUM  
secretariat@csee-etuce.org

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John MacGabhann

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Jelmer Evers

## ETUCE contribution to the EU 'Apply AI Strategy'

(Public consultation, June 2025)

The following contribution represents the view of the European Trade Union Committee for Education (ETUCE) which represents 123 Education Trade Unions and 11 million teachers, academics, researchers and other education personnel 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 also the European Region of Education International (EI), the global federation of education trade unions.

As the voice of teachers, academics, researchers and other education personnel in Europe, we acknowledge the impact that the upcoming AI Strategy can have on the education sector, particularly the Strategy's aim pertaining to "fostering the integration of AI solutions in the public sector to substantially improve the quality of services provided to the public".

The present contribution is based on the ETUCE Policy Paper on AI-enabled Technologies and the ETUCE Position of the Union of Skills. It complements and should be read in conjunction with the ETUCE contribution to the Apply AI Strategy for Science (available [HERE](#))

In line with the Union of Skills, the AI Strategy is anchored on the EU aims to drive economic competitiveness. While ETUCE recognises the importance of supporting the development of EU-based AI systems and to build the EU competitiveness in a changing geopolitical context, we emphasise that **education** must remain a **public good**, a collective responsibility and not just to serve the urgent and always changing needs of the labour market. To ensure the long-term flourishing of our European values and fundamental right, young people of today need to be prepared to be active and informed citizens, with a broad set of knowledge, skills and competences and be aware and practice notably their democratic and labour rights.

ETUCE is concerned that an overemphasis on the economy, innovation and the labour market may overshadow education's fundamental roles in fostering **democracy, social inclusion, and equality**. Education should not be viewed merely as a means just to produce a skilled workforce but as a cornerstone for developing well-rounded individuals capable of critical thinking and active citizenship. While economic growth and innovation are vital, Europe must avoid the mistake of replicating the failing economic models of competitor countries. These models that have fuelled rising inequality and poverty, exploited natural resources, and concentrated wealth and power in the hands of a few. Europe must seize this opportunity to invest in developing a distinct model of growth and innovation, firmly rooted in European democratic values and our social model. This primarily means investing in people and placing them at the



heart of our approach. Achieving this requires sustained public investment in high-quality, inclusive public education accessible to all. This is the only way to ensure a sustainable and equitable economic, human and social advancement for future generations.

With regard to the aim of the AI Strategy to boost the use of AI systems in public sectors, including education, ETUCE emphasizes that despite AI technologies often promoted as transformative, their integration raises fundamental questions about the role of teachers in the classroom, how we teach, and the very purpose of education.

Therefore, ETUCE firmly stresses that the Apply AI Strategy must not promote the adoption of digital technologies simply for the sake of modernisation or to serve industry interests. This risks reinforcing market-driven agendas that benefit the private sector while disadvantaging educators and students.

Instead, **ETUCE calls for:**

- **A needs-based approach to technology:** The integration of AI must be guided by the concrete, bottom-up needs of teachers, students, academics, and researchers, not by the demands of industry. AI should only be implemented when it serves a clearly defined pedagogical purpose that cannot be better addressed through other means.
- **No additional burden on teachers:** For AI to be effective and ethical, it must not add to the already heavy workload of teachers. The long-standing promise that technology would ease teachers' burdens has yet to be realised. Educators need time, training, and professional support to engage meaningfully with AI tools.
- **EU support for non-profit, European-based EdTech:** The European Union should prioritise funding for not-for-profit EdTech initiatives based in Europe, which adhere to European tools, values, and democratic standards. These projects must involve teachers from the outset, including in the design and development of AI tools. Good practice examples, such as NOLAI in the Netherlands, where teachers are given time away from regular duties to act as co-designers, should be replicated and scaled across Europe.
- **Protection of fundamental values and rights:** Europe's regulatory framework on AI is the most advanced in the world and is essential for upholding European democratic values. While parts of the tech industry claim regulation stifles innovation, these rules provide vital safeguards. ETUCE is deeply concerned by recent announcements suggesting a "simplification" of the regulatory framework, which we fear may lead to harmful **deregulation**. These protections must not be weakened.
- **Ethical implementation of AI:** When addressing ethical use of AI, the implementation of Union of Skills should not confuse ethics with legal compliance or universal human rights protections, which are mandatory. Instead, ethics should prioritise AI use and approaches that align with the core purpose and mission of education. AI must not be used to replace the human capacities of teachers or students, but rather to enhance and complement them. In this context, the EU should support the development of supportive frameworks for both teachers and students.
- **Digital and AI literacy for all:** The EU should actively support programmes that empower teachers and students to critically understand and ethically use AI. This includes education on both the potential and the limitations of AI, as well as its social and ethical implications.

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