ETUCE Position Paper
on the new EU Digital Education Action Plan 2020

Adopted by the ETUCE Bureau on 8 February 2018

Summary

Privatisation in and of digital education
Education is a fundamental human right and a public good. Digital and ICT developments in education must ensure that all teachers and learners benefit from (Internet and communication technologies) ICT for their teaching and learning.

Social partners in education should be the drivers and lead the digital and innovative developments in education. ICT businesses and industry can only play a supporting and secondary role since their private interests are harmful for digital inclusion and contribute to indirect privatisation and commercialisation in and of education.

Teachers, other education personnel and schools must have access to the technical support and governmental budgets for the purchases of technology. States should finance the development of suitable ICT materials while teachers should decide on the suitability of materials for teaching. Teachers and other education staff should develop materials during their work time and not at their own cost.

The need for sufficient and sustainable investment in public education is essential to achieve equal access to education regardless of students' social background and their financial means and to provide the adequate teacher training to our teachers at all levels.

ICT for social inclusion
Overcoming the socio-digital divide is crucial. ETUCE supports the use of ICT for inclusion as a tool for supporting personalised learning needs and promoting individual learning opportunities as well as promoting a responsible use of ICT so as to enhance critical-thinking, problem-solving skills, e-safety and digital democratic citizenship. This can only be achieved if there is sufficient and sustainable public investment in education.

Robotics, cutting-edge ICT tools and emerging digital trends in education
Education trade unions should be involved in the preparation and development of innovative ICT and contribute to inclusive education and educational innovation. Teachers are essential agents of inclusion and social justice and educators of future generations of democratic citizens for a better world.

Innovative teaching digital skills: Coding, programming and cyber-security skills
ETUCE notes that the introduction, development and implementation of innovative and complex teaching digital skills may not be necessarily a priority to make effective and responsible use of ICT in education. Moreover, these processes must be conducted pedagogically via blended-learning, consulted with the relevant education trade unions as the representative voice of teachers, incrementally based on successful benchmarks for all relevant aspects of digital competences across the different members states.
ICT in students’ learning assessment and students’ profiling: Learning analytics

Compiling students’ digital profiles should be seen as a method for teachers to better interpret shortcomings and achievements of students’ skills and therefore as supporting the record of students’ achievements. The aim should be to help reducing the administrative burden and workload of teachers so that they can dedicate more time to social interaction between teachers, leaders of education institutions and students and to other relevant activities. Learning analytics should not be misused to take away teaching content that is relevant to the profession.

Position Paper


With the purpose to mainstreaming innovation and digital skills and training in education, a new EU Digital Education Action Plan (DEAP) with concrete measures to be implemented by 2020 and insights for post-2020 objectives, is presently being developed as an integral part of the European Education Area.

ETUCE views to the new DEAP follow the ETUCE policy paper on ‘The 21st Century Teaching Profession and the Use of ICT’ and the statement on ‘Digitalisation, Employability and Inclusiveness’.

1) Privatisation in and of digital education:

1.- Education is a fundamental human right and a public good. Digital and innovative education must ensure that all teachers and learners benefit from (Internet and communication technologies) ICT for their teaching and learning. State education policies must be built on the principle of inclusive education. ETUCE warns that digital business and economic technological approaches entail multiple serious risks and are extremely harmful regarding ICT for inclusive education, contributing to indirect privatisation and commercialisation of education and deepening social, gender, economic, cultural and geographical inequalities.

2.- Social partners in education should be the drivers and lead the digital and innovative developments in education. This is the reason why they should be consulted whenever digital education is on the agenda. The private industry and businesses are not the stakeholders to guarantee quality and inclusive education in the digital era, since their main purpose is to make profit and commercialise education through digital opportunities.

3.- Commercialisation of education jeopardises quality education and can lead to standardisation of education and de-professionalisation of teaching. “Adaptive learning systems” should be focused on quality education and on learning communities in which students learn together. Education trade unions should work stronger to fight against the risks of privatisation in digital education at local, regional and national level.

4.- ETUCE stresses the need for sufficient and sustainable investment in public education to achieve the goal of equal access to education regardless of students’ social background and their financial means and to provide the adequate teacher training to our teachers at all levels of education. ICT equipment, hardware, software and other technical facilitates must be funded by the state. The EU and national authorities should join their forces to ensure that ICT programmes and equipment are available at more affordable prices and respect multilingualism and meet linguistic needs for all teachers and learners at all levels of education across Europe.

5.- Teachers, other education personnel and schools must have access to the technical support and governmental budgets for the purchases of technology. States should also finance the development of
the suitable ICT materials, while teachers are to decide upon the suitability of materials for their teaching and for the learning of their students. Teachers and other education staff should develop materials in their work time and not at their own cost. ICT businesses and industry can only play a secondary role, not a leading nor primary role.

6. **Traditional learning material (textbooks) are generally made by teachers and published by publishing houses.** Publicly produced learning material should not replace textbooks made by teachers who work generally in cooperation with publishing houses. ETUCE remarks that when learning materials become digital or online, **there is no need to change this concept and start producing all learning materials publicly and digitally available.** ETUCE observes that this would only lead to poor quality and increasing work for teachers without remuneration as well as contributing to privatisation. Special attention should be paid to VAT which should be on the same level as printed learning/teaching material so as to guarantee quality and affordable teaching/learning materials for all.

2) **Digital citizenship: ICT for social inclusion and critical-thinking**

7.-Having regard to the previous point, ETUCE emphasises that new ICT and technological developments in education should essentially help bridging the ‘digital divide’, especially concerning disadvantaged students and teachers and other educational personnel. Quality of education including ICT requires focusing on the community in which students learn. The use of ICT and digitalisation bears increasingly the risk of individualisation. Problem-solving skills and critical thinking are best developed within teams, classes and in exchange with other students in the learning community. Teachers are of utmost importance to creating a learning environment that is conducive to a community in which students engage with each other.

8.- **ETUCE supports the use of ICT for inclusion as a tool for supporting personalised learning needs and promoting individual learning opportunities.** Inclusive and ICT barrier-free learning environments must be promoted at all levels of education. ETUCE remarks that ICT for information accessibility and educational resources in learning for all is essential for equitable lifelong learning and equal opportunities. Indeed, to overcome the socio-digital divide, this must not be conceived as the standardisation of learning lessons and materials, but as an opportunity to integrate adaptability and information accessibility features into the relevant e-teaching material.

9.- **ETUCE welcomes EU-wide awareness raising campaigns and initiatives targeted at educators and learners to promote online safety, cyber-safety and media literacy.** For these campaigns to be efficient and meaningful, the consultation of the education social partners, in particular, education trade unions in Europe is needed. These campaigns should also address other digital challenges such as the promotion of critical-thinking, the prevention of cyber-bullying, the importance of democratic digital citizenship, ‘netiquette’ and the prevention of indoctrination through the Internet and social networks. For example, the effects of campaigning for ‘code education’ should help promote critical-thinking and problem solving-skills and reduce the ‘digital skills gaps’, especially as regards the educational inclusion of disadvantaged students, rather than looking only at employability purposes.

10.- Digital skills should primarily be considered as a complement to the acquisition of key social, civil and intercultural competences in order for students to critically think, identify and handle the relevant information both when working individually, in-team or for project-based learning and become digitally-conscious and sensitive as well as active democratic citizens. Hence, ETUCE observes that the incorporation of safe ICT use issues (‘e-safety’ and ‘cyber-security’) into the wider teaching of social and digital literacy with all learners is vital for their personal and professional development in changing digital societies.

3) **Digitally-certified qualifications and validation of digitally-acquired skills:**
11. IEA PIRLS studies show that students performing successfully in paper-based tests have high results as well in computer-based ones. ETUCE remarks that digital certifications or similar mechanisms must be secure, reliable and multilingual according to the national contexts and traditions and in view of facilitating recognition and validation across EU countries. ETUCE notes that procedures for issuing online student credentials (e.g. digital transcripts) must be focused on learning outcomes, including transversal key competences and pedagogical aspects, must rely on the assessment conducted by teachers and must be fairly verified and accredited by the relevant education authorities. Digital or online credentials or certifications should be understood only as an added value (e.g. the EU diploma supplement) to existing successful academic certifications and accreditations.

12. ETUCE believes that the need to develop efficient instructional frameworks to guarantee digital and methodological competencies on our teachers is important. Moreover, a special interest is perceived related to define appropriate efficient evaluation instruments for digital skills of teachers.

13. Measuring the impact of developing digital skills in students and in teachers is an issue of special relevance. Evaluations, validations or measurements should also serve to detect strong points and weaknesses in digital skills and competences. ETUCE considers that any evaluation or validation process should primarily identify and accommodate the own ICT and digital training needs of teachers. ETUCE criticises that the so-called “EU-wide indicators of digital competences” follow solely the DIGCOMP Framework and disregards the large disparities as concerns the degree and relevance in digital access, media literacy, use settings and social contexts across European countries. The ‘DIGCOMP approach’ should consider as well “teachers and educators” has one of the specific target groups in their framework and not simply “society” and “learning” in general. ETUCE observes of Open Educational Resources and digital teaching in the diverse national and regional educational that the 5 EU-level digital indicators, i.e. Information; Communication; Content creation; Safety; and Problem solving, are comprehensive and detailed but should take into account children, young people and adults’ skills and abilities at all levels of education (both learners and teachers).

4) Robotics, artificial intelligence and emerging technological trends in education:

14. Teachers will never be replaced by educational robots. Even though educational robots can have some influence, in particular as an information source, in the educational development of students with special needs, they are not educators. Educational robots are artificial intelligence and lack the motivational, inspirational and pedagogical potential, disregard the socio-emotional learning, the human dimension and the personal interaction, can distort the students’ learning process, entail disruption of teaching processes and create additional workload. Teachers are essential agents of inclusion and social justice and educators of future generations of democratic citizens for a better world.

15. Robotics, like other drivers of digital change such as emerging and state-of-art technologies, nanotechnology and 3-D printing, should be an added value and supportive tools enhancing the possibilities of critical-thinking and problem resolution of students and allowing teachers to focus more on in-class activities and student interaction rather than routine work (grading, drilling exercises, information search and etc.)

5) Innovative teaching digital skills: Coding, programming and cyber-security skills:

16. ETUCE considers that the definition of innovation in education systems as it is stated on page 2 of the Communication is too narrow and corresponds to a technocratic approach of the topic. To benefit from the digital opportunities, ETUCE considers that training and professional development in digital skills must be accompanied by the development of pedagogical and didactical use of ICT so that
students learning outcomes can increase. Pedagogy and integration of ICT within and across curricula is important in digitalised learning and teaching.

17.-ETUCE believes that in order to reap the benefits of technological developments, **appropriate and sustainable investment in ICT training, Initial Teacher Education (ITE) and Continuous Professional Development (CPD) is needed** to make teachers and other education personnel digitally competent as well as digitally confident and motivated and able to use ICT pedagogically for the learning processes.

18.-The achievement of the full digital literacy of all teachers and students must be a top priority in the post-2020 strategy. The acquisition or improvement of basic digital skills is crucial to become digitally literate and be prepared for the challenges and opportunities of fast-changing digital societies (e.g. use of social networks, mis-information, etc). Indeed, ETUCE welcomes **supportive measures to the digital readiness of both general and vocational schools to help teachers, trainers and learners strengthen their digital capacity and raise-awareness not only in all EU Member States but also in the Western Balkans, as stated in the Communication**.

19.-ETUCE notes that the introduction, development and implementation of **innovative and trendy teaching digital skills** as regards the school-curricula e.g. coding, computational, programming or cyber-security teaching skills may not be necessarily a priority to make effective and responsible use of ICT in education. Moreover, these processes must be conducted carefully and incrementally, based on successful benchmarks for all relevant aspects of digital competences across the different members states, complying with the national and EU data protection standards and consulted with education trade unions as the representative voice of teachers in Europe.

20.-All teachers and students should have the opportunity to learn how to code and to understand the principle of coding. This entails learning about cyber-security. Having regard to the previous point, ETUCE remarks that teaching coding and programming skills must not serve to teach students as ‘machines’. ETUCE believes that schools are not laboratories to experiment cutting-edge ICT tools or devices with students and teachers. Schools must be inclusive and dynamic learning environments where students can socially interact with each other and with their teachers, instead of being used for the most ambitious attempts of the technology and ICT industry to influence students from early-childhood on to acquire innovative and complex coding and computing skills.

21.-**An understanding of how code works is fundamental for basic digital literacy** – something that is becoming vital for informed citizenship in an increasingly technologised world. It is not a long-term solution to bridge the number of technology jobs with the people qualified to fill them. Teaching code does not stand for creating a source of cheap young labour for the technology and engineering industry.

22.-Potential changes in the code and computing educational dimensions will require that teachers who may be new to programming or computing themselves will need to teach these skills to their students. **ETUCE warns about the increasing involvement of private companies in training teachers and in producing teaching material and guidance on code and computing education. The introduction, modification, development or implementation of code, programming or computing education in the school-curricula is a public responsibility of member states, in cooperation with the social partners in education, in particular, the education trade unions.** The preparation and control of educational content and materials therefore should rest with teachers and educational establishments, so as to guarantee the quality and suitability of education and training provided. Business must not determine education content or uses of technology in education. EU and member states must engage social partners more strongly in the development of the training materials for digital purposes. The Digital European Action Plan should deal in a more concrete way with the ownership and protection of school data and privacy.
23. Each student has his/her own specific and individual personal and learning needs. Any educational digital or online profile should reflect upon both the competences and knowledge of students and not simply the academic achievements of students. Indeed, students’ digital profiling must not be understood as a form of ‘students’ rankings or school league tables’ with the students’ best academic achievements, teacher performance or classroom profiling, but as a method to improve the learning process in favour to the recognition of the learning process and outcomes. Students and teachers’ data protection and privacy must be ensured.

24. Students’ digital profile should be seen as a method for teachers to better interpret shortcomings and achievements of students’ skills and competences with the view to having an educational digital profile that facilitates the assessment and evaluation, and therefore supports the record of students’ achievements. The aim should be to help reduce the administrative burden and workload of teachers so that they can dedicate more time to social interaction between teachers, leaders of education institutions and students and to other relevant activities for quality teaching such as tutoring or pedagogical support. Learning analytics should not be misused to take away teaching content that is relevant to the profession.

7) New ICT tools targeted to teachers and schools for using Internet, communication and digital technologies:

25. Recognising the potential of new ICT in education, ETUCE emphasises that innovative or cutting-edge digital devices must be understood as a complement to successful pedagogical teaching approaches and methods, as concluded in the ETUCE ELFE and ESL projects. Digital technology and ICT should be regarded as only one out of many teaching tools.

26. Education trade unions should be involved in the preparation and development of innovative ICT (e.g. the SELFIE self-assessment tool) and contribute to equity and inclusive education and educational innovation.

27. ETUCE believes that the ‘digitally-capable school’ approach can only be successful if it focuses primarily on learning rather than technology, and takes all the relevant dimensions of public education into account: school strategies, teachers’ training needs, education trade unions’ experiences, teaching practices and curricula and students’ experiences.

28. ETUCE states that innovative tools for assessment purposes of the digital environment of schools, including the teaching activities, as presented in governmental initiatives need to provide also guidance and instructions for teachers and school leaders, integration as well the necessary measures to protect students’ and teachers’ personal data and privacy.

8) Closing the gender gap through digital education

29. ETUCE welcomes the European Commission’s focus on closing the gender gap. Girls and young women require positive examples, role models and support to overcome stereotypes and realise that they too can embark on a fulfilling and successful career in ICT and STEM. ETUCE promotes the idea of enhancing the gender perspective of digitalisation. In this regard, ETUCE observes that women are significantly less represented in Science, Technology, Engineering or Mathematics related academic and educational fields. The elimination of the gender gap in STEM subjects is crucial. ETUCE underlines that targeted efforts are needed to attract girls and women into STEM sectors which offer good employment perspectives as well as attracting boys and men into social subjects and career paths, such as teaching. ETUCE considers that reducing career segregation and fair and better work-life balance polices through digital education are crucial to foster female participation in the labour market and more diverse teacher force.
9) Increase blended learning combining mobility and online cooperation (eTwinning):

30.- E-learning must be integrated via “blended learning” which has to be embedded in the context of education content, didactics and pedagogy. In addition, ETUCE considers that e-learning must not be misused to replace proven pedagogical practices. It is the learning process that ensures the interaction between teachers and students and the support for individual students. For ETUCE, the ‘blended-learning’ principle should serve to develop more autonomous and balanced approaches for teaching students, complying as well with quality and safety standards. The diverse approaches in blended-learning are to take into account the particular needs of teachers and learners within the different national contexts.

31.- Opportunities of online cooperation, in particular, MOOCs and free digital learning, for example aimed at migrant students, should be understood as a complement to enhance their social, civic, intercultural and citizenship competences. MOOCs must count with the relevant pedagogical support and content knowledge of teachers so as to provide inclusive and quality online courses for social integration. ETUCE recognises the potential of MOOCs for teachers’ promotion schemes at all levels of education but recalls that their preparation and development should count with the education trade unions’ consultation.

32.- E-learning has a great potential for teacher professional learning and development. E-learning can also play a role in facilitating learning in rural or isolated areas, enabling students access to lessons from specialist subject teachers. E-learning policy should be part of a broader policy of blended-learning as e-learning should not replace teachers in classroom in any form.

10) EU platform for digital higher education and enhanced cooperation:

33.- ETUCE is looking forward to seeing how this EU platform will be implemented as not much information is available. Education trade unions are concerned about the actors responsible for preparing and developing the online teaching materials for the platform and how quality assurance will be guaranteed. Private companies or consultants should not provide training or educational material. The EU platform should be equally accessible for all students, teachers and researchers in the higher education sector, regardless their mother tongue. ETUCE believes that online continuous professional development material for teachers could be particularly useful. For this EU online platform or digital higher education and research to be efficient and meaningful, consultation on design, development and implementation with EU social partners in education, in particular, with EU trade unions in education is needed.

11) Mainstream innovation and digital in all learning contexts:

34.- All teachers and learners are to be empowered to use ICT at all levels of education, from primary school to higher education. ETUCE believes that all teachers need competences in ICT training which is particularly valuable when considered in a cross-sectoral way. A crucial factor is the availability of ICT training pathways from initial teacher education through to specialist CPD opportunities that support the development of general or more specific ICT competences.

35.- It should be noted that the state of the development of digital technologies in education varies across member states and regions. There are also large disparities between different sectors of education (e.g. Higher Education, Vocational Training or Adult Education). The digital society must not

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2 Please, see section on “Privatisation in and of digital education”. 
be an additional cause for exclusion in any sector. ETUCE lays particular stress on the need to adopt appropriate policies in adult education to ensure that older people are not excluded and can make full use of the technologies that are now part of daily life and work.

12) **New benchmarks for digital competences:**

36.-ETUCE recommends that the European Commission carries out thorough research and an impact assessment beforehand to identify the targets and develop new benchmarks across the EU member states. It is essential to clarify the terms used in ICT indicators not only as regards the digital proficiency of learners, but also the digital pedagogical proficiency of teachers.

37.-With a view to improving education systems to reach equally high level education for all students for post-2020 targets, it is crucial to identify and tackle challenges that hinder teachers’ effective use of ICT. To ensure for example appropriate teacher training, ETUCE believes that it is fundamental to provide teachers with possibilities to identify and accommodate their own ICT training needs.

13) **Ethical issues: legal aspects, plagiarism and data protection in digital educational environments:**

38.-To respond to the need of adaptation of the digital materials to the specific needs of adult and young teachers and teacher students, they should be supported on the ongoing basis in codes of conduct following the principles of professional ethics and professionalism to prevent plagiarism and to ensure data protection.

39.-Clear policies and licences of resources to be used in educational settings need to be an essential part of regular teacher training. A discussion regarding the ownership of students’ personal data is needed.

14) **High-speed Internet connectivity and digital equipment:**

40.-ETUCE recalls the need to make sure that there is substantial and appropriate public investment in digital education, not only regarding equipment, connectivity and internet facilities, but also as regards digital skills and continuous ICT training for teachers and education personnel. In addition, the investment in internet services and facilities should assist the digital inclusion of disadvantaged students.

41.-ETUCE remarks that investment in more ICT facilities and equipment should not be the direction to reduce inequalities and increase ICT education access. Instead, investment should be focused on teacher training and support as well as on student learning so that all teachers and learners can benefit from ICT, as stated in the 2015 OECD report.