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Statement on the European Commission's Communication on Opening up Education

Adopted by the ETUCE Bureau on 19 December

The European Trade Union Committee for Education (ETUCE)* welcomes the European Commission's proposal¹ for innovative ways of learning and teaching through new technologies and digital content. ETUCE fully supports the European Commission's view that innovation in education and training by use of digital technologies can broaden access to education and can contribute to solve the very serious issue of increasing unemployment resulting from the current economic recession across the EU. We agree that the exit of the crisis can be achieved only by sustained investment in educational infrastructures and personnel in education and training and by European funds, such as the Erasmus+, Horizon 2020 and the European Structural and Investment funds.

However, we have the following views on the European Commission's Communication on Opening-Up Education:

1. First of all, **social partners** were not appropriately consulted on this policy initiative. Furthermore, we regret that the role and actions of the social partners are not taken into account in the policy initiative.
2. The European Commission continues to perceive education and digital competences mostly from an **economic perspective**, while we believe that the Commission should equally stress that education is a human right and is crucial for all citizens in every aspect of their lives.
3. Generally, the communication follows the trends of disaggregating and **privatising education**. Opening up the recognition instruments used in formal education to the "much more diversified educational offer" and introducing "open badges" is a further step towards the disaggregation and privatisation of education. There is a lack of information on who the "new education providers" are supposed to be, but it implies to the reduction of teachers as well as of schools in a digital revolution in education.
4. The digital skills are recognised as a prerequisite for many **jobs**, but adult learning and lifelong learning need to be underlined in the document and in particular the important element of improving digital competences in these areas.
5. The communication claims that school education and the VET system is characterised by restrictive regulations on **curriculum and assessment** practices, which impede the full exploitation of technology-enabled approaches to teaching and learning. However, the issue at stake is that curriculum is not promoting enough the pedagogical use of

¹ http://ec.europa.eu/education/news/doc/openingcom_en.pdf

ICT. In terms of assessment, there is a need to include digital skills in a more comprehensive way.

6. Crucially, education and the content of educational material is an exclusive national competence of the member states. The communication, however, explains educational success by the internationalisation of education systems.
7. The use of digital application should not be considered as a goal in itself but in its function in teaching and learning to add value. In relation to the expectation that the cost of **educational materials** can be reduced, we would like to underline that not every teaching material can be digitalised as not everything can be studied from a screen.
8. The communication expects that the **cost of educational materials** can be reduced by the use of ICT, however, this requires first and foremost investments in ICT infrastructure. While the European Commission points to the responsibility of the Member States, we believe that it is highly unlikely that the Member States will be able to make such investments in times of austerity. Yet with the present crisis, it is urgent to invest in and modernise free, high quality education in order to pave the way to prosperity.
9. The communication does not take into account that **language and content differentiate** among the member states when it stresses the need for a critical mass of good quality educational content and applications in specific subjects and multiple languages, and when it emphasises the promising potential of Open Educational Resources (OERs) and Massive Open Online Courses (MOOCs). As stated in the communication, much of the supply of digital content comes from outside Europe and it is predominantly provided in English.
10. It is questionable whether educational institutions experience a shortage of **digital contents and materials** at present. It is naïve to believe that the use of OERs (Open Educational Resources) will be free of cost as, the communication suggests. With regard to MOOCs (Massive Open Online Courses), there is the risk on depending on a highly monopolised market with only three major MOOC providers at present. If “technical tools to integrate metadata” are developed for OERs, as the communication suggests, then these resources are unlikely to be free of charge in the future. Metadata may serve as a digital stamp for companies to monitor their copyright and protect their material against free use in educational institutions.
11. It is unclear how the **quality** of the educational content of OERs can be assured. In this regard, the educational content as proposed in the communication is failing to consider quality assurance. The Commission will use crowd assessment on the online portal to be launched to assess the quality of OERs, while teaching materials should be developed and assessed by qualified staff. It can be doubted that these processes can be translated into crowd assessments.
12. We agree that digital technologies are essential to provide instruments for **teachers** to individualise teaching, to focus on learning outcomes as well as to identify additional support. However, additional demands for teachers to reach a certain level of digital skills and to perform even more tasks than at present may arise. Additionally, it can affect the educational staff’s working conditions, e.g. working time, availability and workload. Furthermore, the communication asks for evaluation schemes to “create the right stimulus for teachers”. Such schemes request teachers’ professional education, which requires additional investment from the Member States.

13. **Data protection and digital safety** are issues left untackled in the policy initiative. However, we believe that if education institutions are asked to open up their programmes to the digital world, the protection of their data must be guaranteed.
14. It is left unclear how the aim to broaden access for **disadvantaged groups** can be fulfilled. Technical tools should be used to integrate those at risk of exclusion, regardless their social background, racial/ethnic origin, religion and belief, disability, age, sexual orientation or other strands of discrimination. In this context, it is also important to note that special attention should be given to equally address the specific needs of male and female users when it comes to the use of ICT.

**The European Trade Union Committee for Education (ETUCE) represents 132 Teacher Unions and 11 million teachers in all countries of Europe, 4.5 million teachers in the EU, from all levels of the education sector. 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 teacher unions.*