Review of the Digital Education Action Plan

Who We Are

The [Lifelong Learning Platform - European Civil Society for Education](#) represents over 40 EU networks in education and training, with the mission of promoting a lifelong learning approach to ensure quality and inclusive education and training systems. The membership represents and understands lifelong learning as the entire learning journey, from early childhood education and care and going through all learning environments (formal, informal and non-formal) and sectors (ECEC, compulsory education, VET, HE, ALE). The members engage in digital education (development of digital education content and curricula, implementing pedagogies for digital education, validating digital competences, developing digitalisation strategies) and LLLPlatform transversally works on this topic for its members.

Digital Education Action Plan: Evolution not Revolution

As an organisation promoting transversal and lifelong learning perspectives to education and training, LLLPlatform values the whole-of-government approach which DEAP (and more specifically the Council Recommendations on the key enabling factors for successful digital education and training and on improving the provision of digital skills and competences in education and training) promoted. This impacted how Member States worked on digital education, and **such an approach is essential to ensure coherent and effective policymaking in digital education**.

Challenges ahead

Synergies

LLLP identifies a **disproportionate focus on school education**, especially considering the Council Recommendation on the key enabling factors for successful digital education and training. DEAP is not fully connected to the European Skills Agenda, while the interrelation among DG EAC and DG EMPL in the implementation of the DEAP must be improved. For example, the European Year of Skills touched little on the DEAP, while the current review/interim evaluation of the European Education Area has not been connected sufficiently with the mid-term review of DEAP. DEAP's implementation can be better connected to the **Council Recommendation on Upskilling Pathways and with the Council Recommendation on Micro-Credentials, but also with the Quality Framework for Apprenticeships**.

Missing or insufficiently developed topics

LLLPlatform highlights that **validation and recognition** of digital competences obtained in informal and non-formal contexts should be strengthened and approached coherently by DEAP considering that many such competences are developed outside formal education and training institutions. DEAP should be leveraged for implementing the **Council Recommendation on the Validation of Non-formal and Informal Learning.**

LLLPlatform draws attention to **procurement of digital technology** in education and training. Educators and education and training institutions receive insufficient guidance on this, there is a lack of quality assurance on available digital education content, while fair and sustainable alternatives to the BigTech, such as Creative Commons or free open source software, are insufficiently promoted. The DEAP should focus more on **promoting a democratic space online, preventing monopolies which lead to commercialisation and commodification, through free open-source software support and creative commons.** Otherwise, digital education and the proliferation of AI will create more inequity and inequality in education and training. Linked to this matter, DEAP needs to better support educators on regulations on copyright and on securing IP rights.

DEAP must insist on **basic competences development**. The percentage of Europeans without basic digital skills is worrisome, while the sliding back on PISA results on basic skills makes it difficult to have the foundational skills needed for digital competence development. Basic competences development should be better linked to **digital citizenship education**. Partnerships with the Council of Europe's digital citizenship education approaches should also be explored in this context. This also includes more **synergies between the DEAP and DigComp** to support the uptake of DigComp by the different education and training providers.

When it comes to **data privacy**, the experience across education and training sectors shows gaps across the EU. DEAP must focus more on ensuring that educators and learners are trained and guided to understand how to ensure data privacy, while the implementation of new digital-related legislation, such as the AI Act, must be explored in terms of long-term implication and in terms of the expectations placed on the education and training stakeholders for transposing such legislation. The approach towards cybersecurity, AI and digital at large should be human-centred, ethical and should protect data owners.

Stakeholder involvement

LLLPlatform recommends a **better monitoring of how stakeholders are involved in consultation, implementation and monitoring of initiatives related to DEAP**, especially at local and national level, where stakeholders are largely missing from the work of Member States. Civil dialogue and social dialogue must be strengthened, as only such a structured approach can ensure buy-in for the complex policies proposed by DEAP. Learners and educators are not structurally engaged, and when they are, it happens at policy level but not at the level of the funding associated with said-policies. There is too much obscurity regarding which funding programmes are used and how on the implementation of DEAP, with stakeholders being skipped from such negotiations at local, national and European level. **DEAP requires more synergy across the various funding lines at EU and national level, and civil society stakeholders need to be part of decision making relating to such funding.** The involvement of

stakeholders should be done by means of exploring the implementation of open source digital education tools developed by such organisations, by promoting their innovative pedagogies (often taking place outside formal education) and ensuring that such stakeholders are part of the data collection on the implementation of DEAP, considering how civil society frequently collects data at more granular levels than what specific national statistics institutes would have.

DEAP remains appreciated by civil society, but requires planning for a continuation post-2027 and one which requires operationalisation and implementation in coming years. Multiple highly appreciated initiatives were launched which now require consistent communication so that learners and educators can take them up, but also guidance tools and implementation tools. DEAP must continue to insist on competence development, as understood within DigComp, without advancing a narrow approach of skills. The debate on competences and skills is well documented in the LLLPlatform Position Paper on Key Competences for All (**here**).

For more information, contact policy@lllplatform.eu.