

European Students’ Union (ESU)

Fighting for students' rights since 1982

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**ESU’s contribution on the European Commission’s Calls for evidence on digital**

**skills and digital education**

The European Students’ Union (ESU) is supporting the initiatives of the European Commission to create synergies at European level and to set ambitious targets in order to unlock the full potential of digitalisation in higher education, with the key principles of accessibility and quality of digital education and use of digital tools in education in mind. However, it is important to take into consideration that many caveats and shortcomings can occur if some underlying issues are not addressed, including at European level.

Since providing digital skills for education and training and highlighting the factors for successful digital education are interconnected, ESU has prepared this common contribution to the European Commission’s calls for evidence on the Proposal for a Council Recommendation on improving the provision of digital skills in education and training, as well as for the proposal on Digital education – enabling factors for success. In this contribution, we will point out the main challenges that need to be addressed from students’ perspective, as well as proposal for new initiatives to be taken up by the European Commission on digitalisation:

# Digitalisation of education is not a goal in itself but can be used as a means to achieve other goals such as raising its accessibility, quality, internationalisation and sustainability.

Sometimes, digitalisation is treated as a goal in itself, as a “trend” to keep up with for the sake of prestige, as a tool for saving money by cutting teaching hours, or as an opportunity to generate revenue by creating for-profit online courses. In order to set the discourse on digitalisation adequately, it is important that the Council Recommendations define and affirm the ultimate objectives of the digitalisation, to construct and evaluate the public policies of digitalising higher education against the set objectives and to collect granulated data in order to assess the achievement of the objectives.

Even though multiple options are on the table, from ESU’s perspective digitalisation needs to be seen as a tool

to increase:

* + accessibility, by providing adaptive tools for the different needs of learners;
  + quality, by permitting the usage of diverse innovative digital software without barriers, in students’

interest, providing a more student-oriented, learner-friendly approach.

* + internationalisation, by giving opportunities to international learning experiences at home, but without deprioritising or ignoring the indispensable added value of physical mobility;
  + sustainability, for example by creating the option of less travel (e.g., many flights are made only for short meetings such as thesis defence or participation to one-day lectures with no interaction needed).

Despite the obvious economic benefits of digitalisation, it is necessary to highlight that economic growth is far from the only scope of digitalisation, and this negative tendency is actually supporting commodification of higher

education. In the current landscape, digital tools are also needed to counterbalance fake news dispersed through digital means and to promote critical thinking.

Furthermore, we need not to see digitalisation exclusively as a medium of transmitting knowledge. During the pandemic, countries had to transfer most of their teaching and learning online, but digitalisation is much more than using an online platform for learning and this needs to be highlighted.

# Digitalisation needs to follow student-centred learning approach and to promote flexibility

Digital learning has the potential to offer many benefits to higher education, for example by making it more student-centred. However, if it is not implemented correctly, it also has the potential to do harm.

Using the right digital tools and methods to develop higher education can enhance the learning experience for students and provide new insights into teaching for teachers. Crucially, institutions should evaluate the effects of digital learning as it has been implemented and hear the students' perspective when doing this. Even though through digitalisation the use of learning analytics for assessing the fitness-for-purpose is increasing, we should not forget that student-centred learning needs to be assessed directly, through feedback, focus groups and involving student representatives and student unions.

On the downside, not implementing digitalisation effectively can create the situation when students are overburdened or confused, for example by the multitude of learning platforms, with different rules and ways of interaction. Creating an institutional approach that puts at the centre the student experience is a top priority in this sense. Furthermore, students falling behind because of the lack of digital skills or because they couldn’t adapt their learning style to the use of digital tools should be supported through remedial activities.

The deployment of digitalisation in higher education clearly offers a broader range of possibilities in creating one’s learning pathway, thus encouraging flexibility. However, without explaining through student-friendly means the possibilities, consequences, and the links between learning pathways, this would create confusion and put additional burden on students.

# Digitalisation is not an excuse for reducing investment

Digitalisation can never be an excuse for reducing investment, and rather requires investment to ensure successful implementation. Higher Education institutions (HEIs) need to invest in high-quality infrastructure, and in the broadest accessibility possible for students to attend online classes. Furthermore, digitalisation doesn’t imply that necessary investment in physical infrastructure can be ignored.

# Training for students and stuff on improving digital skills and using digital tools is essential, otherwise digitalisation increases inequality, instead of reducing it

Staff and students need to be trained to gain the necessary skills, both technical and transversal (such as data literacy), in order to be able to make use of the tools constructively. Importantly, staff need to be trained pedagogically to develop high-quality educational content using digital tools and to have sufficient time and space to do this. Thus, digital skills need to become embedded in the initial and continuous academic professional development.

Students and staff need to acquire not only the technical skills to use digital tools but also other transversal and transdisciplinary skills and attitudes, such as data literacy, ethics and privacy.

# Digitalisation requires support systems in place (including adapting the ones offered on site, when applicable) and a special focus on mental health

The support systems that are expected in a physical learning environment also have to be offered to students accessing education partially or fully online. This includes library resources, academic counselling or psychological support.

Fully online courses can lead to seclusion, as well as other mental health issues. It is crucial that Higher Education institutions offer free access to quality psychological support, and support students in accessing these services.

# Digitalisation leads to emerging ways of learning, but they need to be standardised and recognized

One of the emerging methods of delivering knowledge is through Massive Open Online Courses (MOOCs). They should not replace, but rather enhance the direct learning experience and support lifelong learning (LLL). Another tendency is the usage of Virtual Reality (VR) and the products offered by the EdTech sector. Irrespective of the provider, they need to be adaptable for the classroom, since the best choices about the content delivery are to be decided in the student-teacher direct relationship, and material offered partly or fully by private companies also needs to be subjected to those quality standards.

When applicable, MOOCs and other online courses should be recognized as non-formal learning and be included in the procedures of recognition of (prior) non-formal and informal learning. For the combination of types of learning and recognition of digital non-formal learning, explicit guidelines need to be developed that would strengthen the synergies between the formal education and non-formal education, including that provided by NGOs.

# Digitalisation needs a whole institutional (holistic) approach, overarching frameworks and strategies devised with stakeholders

If digitalisation is to be a transformative tool, it needs to prove itself as a whole institution paradigm shift. In order to have successful coordination, digitalisation units or other administrative units with general oversight need to be in charge of the digitalisation process. Furthermore, digital interaction between students and HEIs should become the norm, without prejudicing the right of students to have direct interaction with academic staff and administrative personnel.

For digitalisation to be accepted by the whole academic community, the strategies put in place need to be created, implemented, and evaluated together with stakeholders, especially student representatives and student unions, in order to gain community support.

There is no one-size-fits-all model to enhance digitalisation, and each target should be reviewed against the actual added value it brings to students, without implementing tools which are not fit for purpose for their own sake.

# Digitalisation cannot leave any student behind

Several student categories, such as students with disabilities or neurodiverse students require additional support to fully access the digital environment. Without providing this support adequately, digitalisation increases the discrepancies. Therefore for staff, training on inclusion of a diverse student population is relevant as well.

Furthermore, students may be in the situation where they do not have electronic devices, or their devices are not suited in terms of performance for the tools needed in class. In these cases, without this intent, technology can become an empowerment tool for the privileged, instead of an opportunity for everyone.

Other issues can be low speed internet connection (which can result in a de facto lack of access to education and may also lead to missing assignments) or not having a personal space suitable to be a learning environment (and learning spaces may need to be provided). For all these situations HEIs and governments should pay special attention, and the EU can support funding the needs.

# Digital education needs to be quality assured with the same principles in mind as face-to-face learning, even though the operationalisation can be different

Digital and blended learning must also be subjected to the same standards as already existing learning and teaching methods, such as proper and learner-inclusive quality assurance of digital learning tools and methods. A common effort of stakeholders, especially QA agencies and student representatives, needs to take place in order to ensure that up-to-date, relevant and, if necessary, adapted quality assurance standards and guidelines are in place for digital education. Even though this process has happened in many instances during the pandemic, the process was a rapid one, understandably marked by urgency. The lessons of the pandemic should be addressed and the current frameworks on the provision of digital education re-evaluated.

# Digital education should promote synergy with blended and onsite education

Digital tools are the most useful when used in tandem with other learning methods – diversity in available learning methods is key. Blended and digital learning has the potential of increasing participation in formal education, as well as creating tools to meet preconditions for accessing higher education. Universities should establish an environment in which face-to-face communication and digital learning complement each other to offer a modern and holistic approach towards higher education. It is important to assess that, in mixed onsite/online classrooms, access to participation of the students online is equal to those onsite. Furthermore, a holistic approach requires an integrated framework for onsite, blended and digital learning: it must be avoided that blended and digital learning are used as ways to avoid investments in accessibility and affordability to the onsite education.

# New methods of delivery require introspecting the methods of assessment

Increasing assessment due to data collected learning analytics bears a risk in influencing the learning behaviour of students and increases the risk of pressure to perform and it may lead to increased pressure tackling students' mental health. Special attention needs to be paid to assessment in digital learning and making sure that the methods used for assessment are appropriate for the intended learning outcomes, are accessible for all students, and follow ethical standards.

# Use of artificial intelligence, collection of data and ensuring privacy need to be regulated

Students must remain owners of their data and their privacy has to be respected by design. Whenever data is used in educational processes, such as through learning analytics, including the help of Artificial Intelligence (AI), ethical standards have to be followed, ensuring all students are fully informed and avoiding third party profit of data. The use of data should never diminish the student-centred perspective, but rather has to enhance the quality and accessibility of education.

No student should ever be forced to use any digital tool that will use, store, or track their behavioural patterns against their will. Caution needs to be exercised to make sure that digitalisation does not lead to an excess of assessments and that ethical standards are followed, without using proctoring systems which can be intrusive.

Apart of the previous proposals for content to be included in the Council Recommendations, in order to ensure the full potential of digital learning while protecting students’ needs and interests, ESU suggest the following initiatives to be taken up at EU level:

1. As part of the European Learning Model, promote open protocols that would support interoperability of different learning platforms used by Higher education institutions, as well as joint procurement vis a vis the private providers of learning platforms to ensure better services at lower prices for HEIs.
2. Create an agreed set of guidelines for governments to incentivize the development, monitoring and evaluation of institutional digitalisation strategies, with respect to equity and inclusion and by including stakeholders, especially student representatives, in the design and implementation.
3. Approve European Guidelines on the ethical use of data and AI in education, and exchange of expertise and training of staff about using data.
4. Together with E4, support the development of guidelines for digital pedagogy.
5. Create a European Learning Platform, with free, quality assured and open source learning tools and materials, which can also digitally connect university libraries across Europe.
6. Create a special indicator to monitor accessibility of digital education for students from disadvantaged backgrounds.
7. Promote tailored funds and technical support for improving connectivity and accessibility of digital education.
8. With different models (DigiHE, HEInnovate) as a starting point, promote an overarching digitalisation self- assessment tool.
9. Involve stakeholders in the structured dialogue established on digital education.
10. Add a higher education component and increase the outreach of the Digital Education Hub. For full ESU position on the subject, please refer to:
11. ESU Policy Paper on Quality of Education - [https://esu-online.org/wp-content/uploads/2022/02/Policy-paper-](https://esu-online.org/wp-content/uploads/2022/02/Policy-paper-on-Quality-of-HE-2021.docx.pdf) [on-Quality-of-HE-2021.docx.pdf](https://esu-online.org/wp-content/uploads/2022/02/Policy-paper-on-Quality-of-HE-2021.docx.pdf)
12. ESU Statement on digitalisation - [https://esu-online.org/wp-content/uploads/2019/06/BM76\_-Statement-on-](https://esu-online.org/wp-content/uploads/2019/06/BM76_-Statement-on-Digitalisation.pdf) [Digitalisation.pdf](https://esu-online.org/wp-content/uploads/2019/06/BM76_-Statement-on-Digitalisation.pdf)