ESU feedback on the Council Recommendation on improving the provision of digital skills in education and training

The European Students' Union (ESU) is supporting the proposed Council Recommendation on improving the provision of digital skills in education and training, welcoming the initiative as a timely and needed coordination of national policies in digital education through evidenced-based recommendations. Analysing the proposal, we appreciated the integration of several points mentioned by students in the ESU contribution to the public consultation, as well as in other consultations convened by the Commission and in our analysis.

From a general point of view, ESU remarks that:

- Despite several references related to the inclusiveness of providing digital skills and in comparison with the CR on enabling factors, the Council Recommendation doesn't offer specific measures, either as recommendations for national level or measures at European level, to foster inclusive digital education content and digital skills ecosystems.
- While determining the relevance of the provision of basic, advanced and specialised skills at higher education levels, the set of more concrete measures/recommendations are tackling especially the provision of advanced and specialised skills.
- More attention should be paid to the sub-set of digital skills related to Artificial Intelligence, as the disruptive developments are able to impact all sectors of society and economy, not only those related to digital careers.

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Furthermore, the need to understand the fundamentals, advantages and risks of AI is transversal across sectors and no specific emphasis is placed on this.

- While aiming for quality ecosystems of providing digital skills, there is no reference to student-centred learning, student consultations, engagement, feedback and student agency or general student empowerment, which not only ignores the entire paradigm built within the Bologna Process and taken up by the European Education Area, but can heavily hinder the advantages brought forward by the flexibility of tools used in developing digital skills.

ESU's specific amendments to the proposal can be found below:

Nr.	Current text	Proposed text	Justification
1.	Recital (10) Council Recommendation on key competences for lifelong learning includes the confident, critical, responsible and sustainable use of, and engagement with, digital technologies, as one of the eight key competences for lifelong learning. The Digital Competence Framework for Citizens (DigComp) sets out the key elements of digital competence in five interrelated areas with different proficiency levels. The framework is used by education,	Recital (10) Council Recommendation on key competences for lifelong learning includes the confident, critical, responsible and sustainable use of, and engagement with, digital technologies, as one of the eight key competences for lifelong learning. The Digital Competence Framework for Citizens (DigComp) sets out the key elements of digital competence in five interrelated areas with different proficiency levels. The framework is used by education,	More communication and dissemination work is recommended in order to widen the outreach of DigiComp framework, especially at grassroots level.

	training and certification providers as a reference for the development and assessment of digital skills.	training and certification providers as a reference for the development and assessment of digital skills, **while additional effort should be put into promoting it towards education institutions, teachers and non-formal education providers.**	
2.	1.6 Ensure relevant and methodologically sound monitoring, evaluation and assessment of educational initiatives and training programmes on digital skills at local, regional and national levels to prove and improve the effectiveness and quality of the actions taken	1.6 Ensure relevant and methodologically sound monitoring, evaluation and assessment of educational initiatives and training programmes on digital skills at local, regional and national levels to prove and improve the effectiveness, **inclusivity** and quality of the actions taken	Building an inclusive European Education Area is a strategic priority for ensuring its success. As the lack of basic and advanced skills is heavily influenced by factors pertaining to inequality, especially socio-economic background of disadvantaged students, one of the objectives to be implemented, monitored, evaluated and assessed is the inclusivity of actions taken.
3.	3.1 Support cross-curricular approaches for the provision of digital skills in formal education	3.1 Support cross-curricular approaches for the provision of digital skills in formal education (ECEC, primary and secondary,	Cross-curricular approaches in formal education should include all levels, as such also higher education.

	(ECEC, primary and secondary, including VET)	including VET, **and higher education**)	
4.	7.1.1 Digital skills courses across levels and disciplines with the objective to strengthen the provision for all students, regardless of the sector of their professional career	7.1.1 digital skills courses across levels and disciplines with the objective to strengthen the provision for all students, regardless of the sector of their professional career, **including on understanding the impact of AI**	Students across all sectors should be able to understand the basic underlying fundamentals of AI and how it could impact them professionally and personally.
5.	7.4 Ensure quality and recognition of qualifications and micro-credentials (in line with the European approach to micro-credentials).	7.4 Ensure quality and recognition of qualifications and micro-credentials (in line with the European approach to micro-credentials), **as well as the recognition of prior non-formal and informal learning on digital skills, in line with the 2012 Council Recommendation on validation of non-formal and informal learning**	In relation to progressing in higher education, many students already have achieved digital skills through non-formal and informal ways prior to entry in HE, apart from the digital skills they may have obtained through formal schooling. This set of priorly existing skills should be validated and valorised in HE as well, through recognition of prior learning practices.
6.	7.5 Reward and recognise efforts of teaching staff and higher education institutions to strengthen the	7.5 Reward and recognise efforts of teaching staff and higher education institutions to strengthen the	The proposed Council Recommendation recommends to member states policies that improve

	provision of digital skills to all students	provision of digital skills to all students. **Promote through various incentives the quality of digital skills provision, including through student feedback mechanisms.**	the quality of digital skills provision, as referenced in Recommendation 1.6. For this, the MS should incentivise the institutional processes leading to increasing the quality of digital skills provision, and ensuring student participation in the process is of utmost importance in order to align the learning outcomes with student needs and expectations.
7.	9.1 Support and promote the certification of digital skills of all citizens across all sectors of education and training, including those gained through training provided via the individual learning accounts. Support education and training institutions in delivering trusted certification of digital skills.	9.1 Support and promote the certification of digital skills of all citizens across all sectors of education and training, including those gained through training provided via the individual learning accounts. Support education and training institutions in delivering trusted **and quality assured** certification of digital skills.	Both proposals of Council Recommendations to be adopted reference the relevance of quality assurance tools and recommendations to work on quality assurance at national at European level. Besides requirements, support should be given to education institutions to meet the expected standards. Furthermore, the basis of trust in the certification lies substantially on a trusted quality assurance process that confirms meeting the quality criteria.

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8.	10.1 Use forecasting to assess the future needs for digital skills of different target groups of the market, particularly those of SMEs and conduct research to better understand the digital skills gaps (…)	10.1 Use forecasting to assess the future needs for digital skills of different target groups of the market, particularly those of SMEs and conduct research to better understand the digital skills gaps, **and use graduate tracking initiatives, in line with the 2017 Council Recommendation on tracking graduates, to analyse how the digital skills are effectively valorised**. (…)	A priori forecasting should be combined with a posterior analysis that could feed into policy making. As digital skills are transversally used and not only subject-specific, understanding how the delivery should be designed based on various uses in practice is even more important.
9.	10.5 Provide comprehensive career and study guidance at school, VET and higher education level to stimulate young people's interest, particularly that of girls and young women, in taking up studies in ICT and/or pursuing a career as ICT specialists (…)	10.5 Provide comprehensive **and accessible** career and study guidance at school, VET and higher education level to stimulate young people's interest, particularly that of girls and young women, in taking up studies in ICT and/or pursuing a career as ICT specialists (…)	It is not sufficient to provide career and study guidance if it is not timely and accessible. In several MS the issue at hand is not the existence of the service, but its availability based on number of employees, funding and resources etc.
10.	10.8 Create opportunities for schools, VET providers and technical universities to attract students to	10.8 Create opportunities for schools, VET providers and ~~technical universities~~ **higher education**	Not only technical universities provide digital skills or study programmes that could lead to

	digital careers (for instance by organising open days, family days, seminars and by promoting participation in initiatives such as the Innovation Talent Platform142, EU Code Week, the Digital Education Hackathon, and extracurricular activities).	**institutions** to attract students to digital careers (for instance by organising open days, family days, seminars and by promoting participation in initiatives such as the Innovation Talent Platform142, EU Code Week, the Digital Education Hackathon, and extracurricular activities).	digital careers and in any case 'higher education institutions' is a more generic term than 'universities'.
11.	2. Promote excellence in advanced and specialist digital skills courses in higher education and VET. In particular, the Commission intends to: 2.1. Support Member States in creating conditions conducive to developing advanced and specialist digital skills of students, researchers and lifelong learners,	2. Promote **basic digital skills and** excellence in advanced and specialist digital skills courses in higher education and VET. In particular, the Commission intends to: 2.1. Support Member States in creating conditions conducive to developing **basic,** advanced and specialist digital skills of students, researchers and lifelong learners,	Despite the efforts to provide basic digital skills for learners from earliest age,due to inequality or poor quality educational background students may still face gaps in basic skills when taking up higher education programmes. Furthermore, both basic and advanced skills could entail domain-specific particularities in study programmes. In line with the previous Recommendation 7 to member states and with the explanatory note, HEIs are expected to provide basic digital skills as well and the Commission should promote

			tools, measures, peer learning activities and funding for this purpose.

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