



## **NL position paper mid-term evaluation DEAP 2021-2027**

### **Introduction**

The Netherlands sees great potential in the Digital Education Action Plan (DEAP) for the development of national policy as well as for structuring European cooperation. Going forward, the Netherlands considers that DEAP should utilize more of its potential by focussing on themes in which EU-cooperation has a clear and great added value, through promoting and protecting fundamental values (notably privacy), fostering the development of a high-performing digital education ecosystem including alternatives to Big Tech, and improving standardisation/interoperability. Furthermore, to relate the DEAP more with the broader EU-policies with impact on digital education, steps must especially be taken to create synergies between the DELTA working group and High Level Group Education and Training under the European Education Area.

### **Current actions**

Reviewing the current actions in the DEAP, we have concluded that Dutch organizations from the national education sector<sup>1</sup> see the establishment of the Digital Education Hub(s) as the most positive action in the DEAP. Information exchange works well, best practices are shared and in particular the pursuit of European standards is welcomed. The independent prioritization of subjects and projects within the Hub is seen as a positive contributing factor, and the support by the European Commission, also financially, is appreciated as well. The work in the interoperability squad for a vision on educational interoperability and a subsequent framework for a common interoperability approach between HEIs is seen as very beneficial and should be continued.

Some actions in the current DEAP have been of less importance for the Netherlands. Regarding connectivity and digital tools (#4) the Dutch infrastructure is sufficiently mature; regarding the European digital skills certificate/EDSC (#9) the added value for Dutch stakeholders has not been demonstrated yet; the Digital Opportunities traineeships action (#12) is insufficiently clear for students and HEIs. The Netherlands is waiting with interest for more concrete proposals for a European Digital Education Content Framework (#3), which is still work in progress.

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<sup>1</sup> Such as SURF, Kennisnet, the National Agency Erasmus+, UNL

### **Priorities and recommendations for the updated DEAP 2024-2027**

The Netherlands supports the initiative of a DEAP. However, we believe there is unused potential and on this basis, we provide hereunder several suggestions to improve the DEAP in the remaining period until 2027.

#### Principles

- **Subsidiarity.** Measures under the DEAP should have clear European added value compared to national digitalisation policies and, fully respect the autonomy of educational institutions. Measures should support primarily Member States' education policy to have more impact and focus less on interventions that target individual education organisations or professionals across countries (acknowledging the added value of the Digital Education Hub in this respect). In this way, the leverage effect and impact of the DEAP will be larger, and contradictions with national policies avoided.
- **Scope.** For Dutch education stakeholders it is unclear which measures are applicable to which types of education organizations and education sectors. The Netherlands is advocating an adequate attention to all education sectors: from primary to secondary education, to (secondary) vocational education and higher education, as well as lifelong learning and adult education. Also, a better distinction could be made between measures focussed at national governments and measures focussing at education institutions and other organisations relevant for education and training.
- **Outreach.** Dutch education organisations are only to a very limited extent aware of the current DEAP and its potential benefits. In the remaining period until 2027, communication should be made more effective, e.g. by organising workshops dedicated to the main issues addressed by DEAP.
- **Synergies and funding.** It is important to have good synergy with other EU policy initiatives and programs, such as the Erasmus+ programme, Horizon Europe and Digital Europe. The mid-term review of the DEAP should therefore also be aligned with the Erasmus+ mid-term evaluation and the development of the new program after 2027. The availability of other EU funds should be made transparent in the DEAP, in order to improve the utilisation, transparency and impact of the action plan. Likewise, it is important for DEAP activities to be in line with the work of NRENS on Member States' national infrastructures, and European cooperation that is already taking place between NRENS<sup>2</sup>, as well as with activities of the European network of Cyber Hubs.

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<sup>2</sup> NRENS are national research and education networks, which are collaborating at European level in the organisation GÉANT, working towards an information ecosystem of infrastructures and services to advance research, education, and innovation on a global scale. See: GÉANT (geant.org)

## Content

- **New priority areas.** For the Netherlands, there are three key priorities that should be taken into consideration in going forward with the DEAP:
  1. Safeguarding of public, fundamental values in relation to digitization, notably privacy;
  2. Promoting alternatives to Big Tech platforms in education, leading to a level playing field between different tech providers in digital education and more autonomy of educational institutions;
  3. Integrated approach to achieve standardisation / interoperability in the European education sector, including the safe exchange of student data, building on the experiences within the European Student Card initiative (ESCI: Erasmus Without Paper and the European Student Identifier).

These are three interrelated subjects for which EU-cooperation has clear added value vis-à-vis national approaches. Examples of initiatives that move into the right direction are the DMA and AI Act, which place higher demands on Big Tech platforms in order to protect end users and which should ideally contribute to the safeguarding of fundamental values in the education sector. For realising a level playing field between tech providers of digital education, and a high-performing European digital education ecosystem, promoting the development of independent EdTech solutions and value-driven, interoperable and open source educational tools is crucial. For this reason, a European framework for cooperation with the EdTech sector could also be beneficial<sup>3</sup>.

- **Artificial Intelligence (AI) and data.** The Netherlands is in strong favour of a continued and even strengthened attention to AI developments and impact on the education sector (in line with Dutch intervention in the EYCS Council of 13 May 2024). Apart from the recent rapid and profound developments in (generative) AI itself, in the coming years the education sector has to undertake a lot of efforts to implement the AI Act and/or be aware of the legal requirements when procuring AI based tools. Nonetheless, there should always be room to explore the potential of AI and to innovate, paying close attention to ethical principles and public values. It should be noted that close cooperation between DG EAC and DG CNECT would greatly help this process.
- **Implementation versus new priorities.** The follow-up activities as agreed in the Council Recommendations on digital education and digital skills concern the areas of certification of digital skills and competences,

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<sup>3</sup> Digital Educations Dialogues (Ghent), May 28-29<sup>th</sup> 2024: Several interventions mentioned the desirability of a European framework for cooperation with the EdTech sector.

quality requirements for digital learning tools, AI integration, and computer science and computational thinking. The Netherlands thinks that these themes (except AI) require less attention in the remaining duration of the action plan, because initiatives to implement those are up and running now (including two recently launched expert groups). This also applies to the broader digital skills theme as such, which in principle does not need additional attention at EU level. It is now crucial that Member States take the recently adopted Council Recommendation into consideration in their national policies, coupled with periodic monitoring and evaluating at EU level.

- **Relation with legislation and other policies within the EU.** Relations of digital education policy with other policy areas, developments and proposals from the Commission should be better defined and monitored. In the context of the changing geopolitical context, new measures may be necessary to protect our democracy. An increased focus on societal resilience and preparedness, requires also higher levels of digital and media literacy. The DEAP should also be aligned with European goals on reskilling and upskilling for ICT professionals, as well as maintaining the focus on women in STEM, emphasizing collaboration with existing national infrastructures. The implementation of digitisation legislation and its impact on education is also an underexposed theme in the current DEAP. For the education sector, legislation such as the AI Act, the Digital Services Act and the Data Act might have great implications. Therefore, the follow-up of the DEAP should provide more insight and guidance on these kinds of legislation.
- **Evidence based policy development.** Policy development in the field of digitization should be evidence based where possible. In order to achieve this, activities in the field of data collection regarding digital education are seen as crucial. The same goes for support for scientific research, experiments, innovation and exploration of future (technological) trends, also in cooperation with other international organisations (Council of Europe, OECD and UNESCO in particular).
- **Digital Education Hub.** Continued development of activities in the Digital Education Hub, and continuation (and preferably also intensification) of periodic exchange on the Hub's activities and outcomes with the member states via the EEA DELTA working group, in order to guarantee a good link and feedback loop between policy development and implementation. The Hub should also be used to share information about the DEAP implementation with the broader community of digital education stakeholders, and should continue to provide the opportunity for teachers and other education professionals from different Member States to interact with each other on digitisation topics.

**Datum**  
10 september 2024