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POLICY INPUT

Digital education - enabling factors for success

EUA's feedback to the European Commission call for evidence

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European University Association asbl

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The European Commission is developing concrete policies to support the digital transformation of higher education and research. This is stated clearly in the [European Strategy for Universities](#) as well in various commitments for the European Research Area. The European University Association (EUA) strongly recommends embarking on a political discussion about the principles that underpin this transformation at the European level and the goals it is intended to achieve. This discussion is all the more important as we find ourselves at a critical moment to build on experiences gained during the Covid-19 pandemic, integrate new digital technologies for university management and drive momentum for Open Science.

The call for evidence

The planned Council recommendations on enabling factors for digital education are a welcome part of this larger policy picture. The challenges that the initiative highlights are all highly relevant and should be thoroughly addressed within the recommendations. The eight points in the [call for evidence](#) are a good starting point, recognising the importance of capacity building, infrastructure, EU funding and supportive regulation of the use of digital technologies. In exploring solutions to the challenges identified, it should nonetheless be specified that the whole-of-government approach should not be a top-down structure but a framework for dialogue and interplay between different stakeholders.

The call for evidence addresses the provision of digital technology solutions and digital content as one point. While both are connected and can be understood as fundamental elements of the transformation, they are very different issues and might require a more differentiated approach. Similarly, while it is positive that the call emphasises equity and inclusion as key principles in the transformation process, it is important to also look to the larger issue of overall sustainability, including environmental issues and based on the holistic goals of sustainability development provided by the UN. Likewise, ethical aspects of the digital transformation should feature as a cross-cutting topic within the wider conversation. The explicit mention of interoperability of platforms and services for higher education is particularly welcome, but it could be extended for a call for common, open standards in the area.

The initiatives mentioned in the call for evidence, while fundamentally important to the transition process, must be considered within the broader political debate about the digital transformation of universities and their place in this transformation. This debate must include all university missions: education, research, innovation and culture.

General considerations

EMBEDDING A VALUE-DRIVEN APPROACH

The main policies of the European Commission relating to the digital transformation are based on values; this fundamental approach should be retained in developing policies which specifically impact the research, innovation and higher education sectors. The goals outlined in the [European Commission's Digital Compass](#) – "solidarity, prosperity, and sustainability, anchored in empowerment of its citizens and businesses, ensuring the security and resilience of its digital ecosystem and supply chains" – are equally applicable to the advancement of universities' missions.

In keeping with this values-driven approach, the digital transformation of universities represents a vehicle for the further advancement of university-specific values, as set out in [Universities without walls](#), EUA's vision for 2030: enabling curiosity, serendipity and dialogue as well as participation and sharing. Whereas particularly data-driven digital technologies are often aimed at maximising efficiency, universities have

an important function as places where reaching the most efficient path is not always a value in itself, and where the ethical use of digital tools can be explored and encouraged. The driving factors of the digital transformation must be recognised as coming from society at large and not only from advancements in technology. When looking at the provision of digital skills, for example, the aim of universities should not only be to equip the maximum number of people with the skills needed to perform specific functions. Rather, the responsibility for acquiring skills lies with the individuals; universities' responsibility is to provide the guidance, opportunities and frameworks for learners with different learning goals to develop their capacities to adapt in changing societies while instilling critical thinking, creativity, curiosity and wonder. As a part of this framework, institutions should ensure that administrative and academic staff have the adequate digital skills, including digital pedagogy, based on open and ethical standards for emerging digital technologies.

EMPOWERING INSTITUTIONS AND LEARNERS

A values-driven digital transformation requires technical fundamentals that form the framework where change can happen. The Council recommendations should be a point of departure to discuss and identify these basic technical requirements that empower institutions and learners and enable change.

The digital transformation for universities is about using data and technologies to add value in and for the institution and as a means to implement change. It is not to be seen as separate from other university activities, but rather as a complementary process that has the possibility to enhance these activities. A culture of openness is at the heart of any knowledge transfer and a key factor in maximising the potential of digital technologies. Universities must be able to choose the technical solutions that fit their needs without being locked into closed systems. This means that the development of European digital infrastructures and related standards for higher education and research needs to be rooted in the principle of openness. As a rule, universities must have free access to the data that they generate. For this, interoperability needs to be ensured through open standards and open data. This will allow universities to access, exchange and analyse data generated through their own activities. Although the recommendation concerns education, these principles must also apply to all missions of universities, enabling open science, open innovation and open education.

In response to these digital demands, a growing field of educational technology platforms is emerging. This is, in principle, a welcome development. A competitive market provides universities with choice and flexibility in terms of identifying suitable platforms, looking to solutions that can provide the best end results and offer most value to the institution. Commercial providers as well as universities themselves should, as a matter of priority, channel investment into creating or using open-source solutions aimed at enabling sharing and participation. It is essential that framework conditions be developed so that universities can also benefit from commercial innovation without being locked into different, commercially controlled systems in which they have little ownership of the data they generate and may face difficulties in changing provider.

Generally, people are the most important element in the digital transition. Academic staff, administrative and technical staff and learners alike must be empowered to co-create institutional policies and structures. Investing in professional development and training programmes will equip people with a broader understanding of the social impact of digitalisation, allowing them to apply their skills and competences to drive positive change at institutional level and play a role in the wider transformation.

ENABLING FACTORS FOR DIGITAL EDUCATION: WHAT THE EVIDENCE SAYS

Consultations with EUA members show that strategies and structures for digital education should be developed in an evidence-based manner including institution-wide self-assessment of the digital and physical environment, taking into account educators, students as well as technical and administrative staff in the process and consider the impact on the institutional community. This will allow institutions to identify good practices and to then scale and multiply them across the whole system, taking into account differences in institutional profiles and missions.

Staff training and peer exchange remain a key element for the digital transition. According to EUA's DIGI-HE survey, peer exchange within the institution – enabling staff to learn from each other, is the most useful measure for improving digital education, followed by professional development and training. Lessons learned from the Covid-19 crisis have not resulted in a common vision of digital education post-crisis and general digital fatigue has also slowed reflection on this topic. This fatigue should not lead to a failure to discuss the values and purpose of the digital transition.

In addition to this overall issue, certain framework conditions must be met. National system level and European level policies and legal frameworks must strengthen higher education institutions in their provision of digital education and encourage and enable collaboration and sharing, support initiatives and investments, in line with academic needs and values:

According to the DIGI-HE survey, roughly every fifth institution mentioned national regulations as a top three barrier, with considerable differences between countries. This has been confirmed by more recent consultations with EUA members, which state that legislative problems continue to prevail in some systems. Blended learning is often only tolerated as long as it remains a marginal component of the course. This was particularly problematic with regards to digital assessment as well as regarding the use of certain learning management systems and education platforms, where GDPR compliance remains unclear, including the use of student data by commercial providers. Moreover, implementation of GDPR and other rules concerning the use and storage of data are uneven across member states. According to a follow-up by EUA survey from 2021, 19 out of 39 European ministries across the EHEA confirmed that they have no national or state-level strategies for digital education in place, though some had measures to support institutions in place.

About 40% of the responding institutions in the DIGI-HE survey ranked investment in equipment and infrastructure as the fourth most impactful enabler for digital education. Most universities had infrastructures such as wireless internet, open library access, online repositories for educational material and campus licenses for software in place; others, such as virtual learning environments and online labs, were available to students in under 60% of the responding institutions, with considerable regional differences. As the European Union plans investment in digital infrastructure as part of its Digital Compass, education needs – including universities and all their interconnected missions – must be given adequate consideration in, for example, the deployment of 5G and the establishment of edge nodes.

Respondents to the DIGI-HE survey mentioned a lack of funding opportunities as a major obstacle to developing digital education. This is particularly visible in the lack of staff resources, which is among the three biggest obstacles for half of all respondents. This shortage is to be kept in mind in view of the increasing pressure on universities to embark on hybrid provision, which would likely imply more human and material resources, and considerable investment in the development of virtual learning environments and the redesign of physical ones.

In order to reap the benefits of the digital transition at the European level, a unique, European student identifier, also for lifelong learning, should be further explored as a technical fundamental to facilitate for example mobility, recognition and institutional cooperation while ensuring that individuals and institutions are in control of their data in alignment with European digital policies and the European Declaration of Rights and Principles for the Digital Decade. The use of a unique, European identifier should be open also for non-EU countries in the EHEA and possibly beyond.

Likewise, interoperability, based on openness, participation and sharing will require a consistent framework of standards and infrastructure that is open and accessible by design. This will be key to support universities in their ability to switch between providers and products connecting to a wider ecosystem of borderless education. It will also enable more innovation in European educational technology by creating a level playing field.

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The European University Association (EUA) is the representative organisation of universities and national rectors' conferences in 48 European countries. EUA plays a crucial role in the Bologna Process and in influencing EU policies on higher education, research and innovation. Thanks to its interaction with a range of other European and international organisations, EUA ensures that the voice of European universities is heard wherever decisions are being taken that will impact their activities.

The Association provides unique expertise in higher education and research as well as a forum for exchange of ideas and good practice among universities. The results of EUA's work are made available to members and stakeholders through conferences, seminars, websites and publications.