



MINISTRY OF CHILDREN
AND EDUCATION

Danish position paper on the Digital Education Action Plan (DEAP) 2021-2027

The Danish Government appreciates the opportunity to share its view on the Digital Education Action Plan (DEAP) 2021-2027. In general, the Danish Government supports the ambition of the DEAP when it comes to improving digital skills and competencies in society. This was highly relevant when the DEAP was launched in 2020 and this is indeed still the case considering recent developments, e.g. of AI-based tools. However, much has also happened since then. Furthermore, we have become increasingly aware that children should not be left to navigate the complexities of the digital world on their own. Therefore, the Danish Government has three key points for the future work within the DEAP:

- 1) The importance of striking the right balance between analogue and digital tools for learning
- 2) EU added value connected to regulation of tech companies and use of technology in education, exchange of experiences should focus on common challenges such as implementation of horizontal EU regulation in the education sector (GDPR, AI Act etc.)
- 3) No need to create new digital education fora – make use of existing ones.

Striking the right balance between analogue and digital tools

While the DEAP was presented following unprecedented demand for digital educational tools during covid-19, the need for both practical, analogue and digital elements in education has become evident after covid-19. The important aspect is that digital tools are used with a didactic purpose and that teachers know how to balance different teaching methods. The point is not to be against the use of digital technology for education, but to make sure that different tools are used to maximize learning outcomes. The key concern should be how to improve learning outcomes using technology as a tool among others – not as an end in itself.

If covid-19 underlined the importance of mastering digital tools, the aftermath of the crisis made it clear that digital technology cannot replace

11 September 2024

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the personal interaction between teachers and students. Furthermore, digital technology cannot stand alone as a learning tool – even if the ambition is to raise digital literacy among students. In fact, according to the OECD PISA 2022 results, reading physical books frequently seems to be a better way to enhance digital literacy than reading on a screen¹. This calls for a continued focus on improving students' basic skills as these are prerequisites for both further education and digital skills. This is important to keep in mind when evaluating the DEAP and reflecting on how to move forward in the field of digital education.

Examples and evidence on how to improve learning by balancing digital and analogue teaching and how to create the best framework conditions in schools (e.g. mobile phone free schools) should be an important part of peer learning in the future.

Regulation of tech companies and exchange of best practice on EU regulation

An important aspect of the European framework conditions for education is the influence of the technology industry on learning via digital platforms, devices, and data harvesting of the use of these.

Recent cases in Denmark and elsewhere in Europe have shown that GDPR compliance is still a challenge for many big tech companies delivering digital solutions to European school systems. While this is a problem in itself, an additional issue is the fact that students – and children in general – are exposed to disturbing and harming content online e.g. on social media platforms.

The Danish Government believes that the big tech industry must be made more responsible for protecting minors against exposure to harmful and illegal content online. This requires stronger enforcement and effective implementation of EU legislation as well as new initiatives, including effective tools for age verification to ensure that minors are only exposed to age appropriate content.

The DEAP should tackle challenges related to common EU framework conditions for educational systems across Member States, such as enforcement of the GDPR in schools, handling of the AI Act, approaches to avoid digital distractions during school days etc. Reflecting on these themes is where EU added value is found in the field of education. Denmark looks forward to receive the study from the Joint Research Centre on the impact of recent horizontal EU regulation on the education sector, and we encourage the Commission to assist Member States in the implementation and facilitate exchange of best practice in this area.

Efficient use of existing fora on education

Digitalisation is a cross-cutting issue with an impact on all aspects of education. Therefore, digital education should not be discussed in niche fora,

¹ PISA 2022 [Webinar: Digital devices in schools: Detrimental distraction or secret to success? \(youtube.com\)](#) presentation by Andreas Schleicher, Director for Education and Skills, OECD

but rather across different settings. More concretely, discussions on digital education topics should take place in existing EU fora such as the High Level Group on Education and Training (HLG) and the Working Group on Digital Education: Learning, Teaching and Assessment (DELTA), as decided by the Council², as these are core themes to be tackled by any educational system in the EU. As an example, DELTA is a valuable forum for exchange on AI in education focusing on a learner perspective.

In general, the Danish Government welcomes opportunities to discuss challenges and best practice e.g. also in relation to GDPR compliance and user friendliness of educational IT tools such as platforms.

There is no need to establish new meeting fora focusing entirely on digital issues alongside existing structures. Education systems should handle both analogue and digital learning elements, challenges and opportunities. This goes for exchange on EU level as well.

² Council Recommendation on the key enabling factors for successful digital education and training and Council Recommendation on improving the provision of digital skills in education and training adopted on 23 November 2023.