



EUROPEAN ASSOCIATION FOR  
THE EDUCATION OF ADULTS

## For Information

EUROPEAN  
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EDUCATION OF ADULTS  
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# Position Paper of the European Association for the Education of Adults (EAEA) on the Digital Education Action Plan (DEAP)

EAEA's Response  
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## Key Recommendations

For EAEA it is essential that future iterations of the DEAP

1. prioritise non-formal education,
2. address the digital skills gap comprehensively, and
3. critically evaluate the true impact of digital interventions on learners' lives.

EAEA welcomes the initiative the European Commission's call for position papers about the impacts and achievements of the Digital Education Action Plan (2021-2027), recognising that it has been, evidently a point of reference when discussing digital education across Europe, funding of the relevant processes and engagement of the spectrum of mainstream education sectors.

The structured consultations and involvement of diverse stakeholders, including educators, civil society, and private sector entities, have been one of the strong points of the DEAP in promoting a more comprehensive and inclusive digital education ecosystem, showing a willingness in aligning these actions with the needs of the education community, and at some level address the barriers faced in the digital transformation and encourage collaborative efforts.

Despite these successes, there is still a critical need to strengthen the focus on non-formal learning within the DEAP, as non-formal education plays a pivotal role in reaching people in contexts of systemic exclusion, offering flexible learning opportunities that are often unavailable in formal settings. Currently, the plan lacks sufficient emphasis on non-formal learning. At the same time, there is a gap in how these contributions are acknowledged and integrated into the broader digital education strategy.



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As part of the adult education community, we acknowledge that the Council Recommendation on the key enabling factors for successful digital education and training, under Action 1 of the DEAP, recognises the importance of “coherent strategies specifically addressing digital education and skills,” including the role of non-formal learning in reaching diverse and often underserved groups.

However, upon closer examination, the inclusion of non-formal learning in the recommendation appears somewhat superficial. While it is acknowledged as important, there is a **lack of detailed guidance or concrete actions that explicitly support non-formal education** providers in the digital transition, such as investing in the digital infrastructure of the organisations, as well as in the digital skills of the trainers/teachers.

The emphasis tends to remain on formal education settings, with non-formal learning often appearing as an add-on rather than as an integral part of the strategy.

Additionally, there remains a **critical concern regarding the reliance on private platforms and technologies in education**, raising questions about data privacy and data access, the commercial exploitation of educational content, and the alignment of technological solutions with the actual needs of learners. For instance, the recommendation encourages partnerships with private entities [1], on which we stress further that it is essential to ensure that these partnerships do not prioritise profit over the educational and social needs of learners, particularly the most vulnerable groups.

Going forward, we commend on the Erasmus+ Teacher Academies and the SELFIE for Teachers tools under Action 5, although not addressing directly adult education practices and professionals, as they have significantly supported the digital upskilling of educators, fostering a collaborative environment for professional development, that we have seen in practice transcending from one education level to the other, providing tools and processes for the common denominators in several aspects of the educational practice, including that of adult educators.

On the topic of digital transformation, there remains a pressing need to address the foundational skills gap, both digital and non-digital, exacerbating inequalities if basic literacy and digital skills are not adequately addressed [2].

In this regard, we keep in mind that the prerogative is a shift from growth for the sake of growth to mindful and inclusive digital transformation, as echoed in discussions on how digitalisation is not found in the constant material innovation of new tools and processes but in the deeper understanding and organic use, in the real world, of the digital element[3].

[1] Referencing page 8/9 of the Council Recommendations, point 1b) regarding the intentions of the European Commission. [Link1](#)

[2] Lire et écrire, our member organization, has published an important open letter, gathering essential insights on who is left behind in a world that is fastly and unrestrictedly getting digitalized, living behind people with lack of basic digital skills facing multiple barriers. [Link1](#), [Link2](#)

[3] Moja Journal of Adult Education and DVV International, our member organization, hold an essential discussion on the topic of Digitalisation In Education: Bringing Adult Education Into The Debate. [Link](#)

We pay significant interest in Action 7, as “enhancing digital literacy and combating disinformation, recognising the urgent need for citizens to navigate a rapidly evolving digital landscape”, has been a key advocacy point of the adult learning and education for years. On that account, **it is important for DEAP to promote, further, open-source tools and materials**, escaping, when possible, from well-known super-platforms, fostering a more inclusive and adaptable digital learning environment, tailored to the needs of our learners, as well as making it easier for our community to control and minimize commercial interest when detrimental to learners’ needs.

A broader reflection on the societal implications of digital literacy—beyond functional skills to include demystification of technology—is also crucial for learners to engage with technology in ways that enhances their ability to critically reflect on the tools and processes of digitalisation.

It is, as it goes, imperative to reflect not only on the actions but also on the language we use to describe digital education, seeing as it is often framed as an unmitigated good, yet it is crucial to recognise the potential downsides and the need for balanced, equitable approaches, considering the essential role of physical meetings and spaces for and beyond digital skills learning.

We, also, recognise that the Council Recommendation under Action 10 aims to improve the provision of digital skills and competences across education and training, paying essential tribute to the “socio-economic gaps” relating to digital skills acquisition and the role of lifelong learning in this. That being said, a critical review reveals that while the recommendations rightly stress the need for “a coherent strategy encompassing all education levels and stakeholders, including the private sector”, **the approach can overlook the nuanced needs of learners**, as the drive towards digital skill acquisition many times overshadows the importance of understanding how these skills integrate into broader social and interpersonal contexts.

The recommendation encourages the “monitoring and evaluation of digital skills initiatives”, yet there is room for improvement in how these evaluations capture the true impact on learner engagement, inclusivity, and societal participation and are not acting as watchdogs of technocratic understandings. The question remains: how can we ensure that digital education not only equips learners with technical skills but also fosters a more equitable, reflective, and responsible digital society?

On that note, at EAEA **we celebrate the initiative of the European Digital Education Hub (EDEH)** and proudly acknowledge our active participation in this collaborative process, advocating for a broader and more inclusive perspective on digital literacy. In the Digital Skills Playbook[4], we emphasise that **digital literacy extends beyond mere technical skills**; it encompasses the ability to understand which tools are relevant in specific contexts, their social and ethical implications, and the characteristics of each tool. We find that the work of EDEH is essential for our efforts to advocate for digital literacy as **a fundamental right, a crucial life skill, and a foundational pillar for citizenship and personal development**—not merely as an operational skill linked to employability or the labor market.



In summary we see that DEAP is a really useful process, as well as tool, towards a more comprehensive understanding of digitalisation in education and society. To that, we want to expand and make evident that for EAEA it is essential that, in the phases to come, DEAP should strengthen its efforts towards a more significant **recognition of adult education and non-formal learning**, address more comprehensively the **digital skills gap** and establish **critical evaluation** practices regarding the true impact of the actions on learners' lives.

Only through a nuanced understanding of these complexities can we ensure that digital education serves the needs of all learners, fostering inclusive, accessible, and sustainable learning environments.

[4] The Digital Skills playbook for educators is a comprehensive guide to addressing the challenge of enhancing digital skills among students, regardless of their age or learning stage. Developed by a team of education experts within the European Digital Education Hub, this playbook aims to equip educators with the necessary knowledge and strategies to support learners in developing basic digital competencies. [Link](#)

## About us

The European Association for the Education of Adults (EAEA) is the voice of non-formal adult education in Europe. EAEA is a European NGO with 120 member organisations in 44 countries and represents more than 60 million learners Europe-wide.



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