



# REPLIES OF THE EUROPEAN COMMISSION

## TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

EU support for the digitalisation of schools:

Significant investments, but a lack of strategic focus in the use of EU financing by member states

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This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 259 of the [Financial Regulation](#) and to be published together with the Special Report.

# I. THE COMMISSION REPLIES IN BRIEF

The Commission welcomes this Special Report by the European Court of Auditors (ECA) on the EU support for the digitalisation of schools. The report comes at a relevant time, as digital education has recently acquired a more central position in the priorities of the Commission.

A Europe Fit for the Digital Age is one of the Commission's six priorities for the 5-year period 2019-2024. Digital Education is at the centre of two recent policy initiatives: the 2018 Digital Education Action Plan, which was the European Commission's first policy initiative on digital education since the 2013 Communication on Opening up Education, and the Digital Education Action Plan 2021-2027 that sets out a common vision of high-quality, inclusive and accessible digital education in Europe. The duration of the latter is aligned with the Union's multiannual financial framework (MFF) programming period. This alignment corresponds to the creation of horizontal priorities in the new generation of the Erasmus+ programme (2021-2027), among which is digital transformation.

The Commission works intensively with Member States on digital education policies and strategies, in accordance with the principle of subsidiarity. The Commission has worked over the years with the Working Group on Digital Education (DELTA), representing ministries of education, stakeholder organisations and social partners. Moreover, in 2021 the Commission launched a Structured Dialogue on digital education and skills with the Member States. This is a process of exchange between the Commission and the Member States involving bilateral meetings, meetings of a high-level group of national coordinators for digital education and skills, and discussions in relevant Council formations.

Connecting all schools to high-speed internet is a necessary condition for the digital transformation in education. This requires investments not only to the backbone or core network, but also investments in local network cabling and equipment with WiFi in schools and classrooms. This need for connecting schools was reiterated in both the Digital Education action Plan 2018-2020 and in the Digital Education Action Plan 2021-2027. In 2016, the non-binding 2025 gigabit connectivity target for schools was set to create a momentum and raise awareness on the need for Member States to connect their schools to high-speed internet. The Commission also fully recognises the need to collect data on the actual connectivity of schools to inform policy-making in the area of digital education.

At the same time, the competencies at European level in the field of digitalisation of schools are limited. The Commission is committed to its coordinating role and will continue its efforts to reach the targets of the Action Plan and involve policy actors and stakeholders in this process, in the frame of its functions and role.

The Commission looks forward to implementing the recommendations insofar as possible and appreciates the attention given to this key area for the future of human capital development in the European Union.

## II. COMMISSION REPLIES TO MAIN OBSERVATIONS OF THE ECA

### 1. Member states use of the Commission's support for the digitalisation of their schools

A Europe Fit for the Digital Age is one of the Commission's six priorities for the 5-year period between 2019-2024. The Commission adopted a first Digital Education Action Plan (DEAP) in 2018, and renewed its commitment to support digitalization of education and training, including schools, with an update of this plan, which was adopted in 2020. The Digital Education Action plan 2021-2027 provides a vision for digital education and aims to support the adaptation of the education and

training systems of Member States to the digital age. Since its implementation in 2021, the Action Plan and its actions have been promoted through a dedicated information and communication campaign. In addition, the Commission is working on the digitalization of schools through exchanges with the Member States, in particular through the Working Group on Digital Education: Learning, Teaching and Assessment (DELTA), which consist of government officials appointed by EU Member States and other participating countries, and representatives from stakeholder organisations and social partners.

The new generation of the Erasmus+ programme (2021-2027) has also seen its horizontal priorities being streamlined. In particular, the programme invites all participating organisation to address their project to one or more of the four horizontal priorities: inclusion and diversity, digital transformation, environment and fight against climate change, participation in democratic life.

These four priorities are particularly important under Key Action 2, as every project should address at least one horizontal priority. Thus, schools taking part in projects funded under the action – Cooperation Partnerships (a direct successor to the former Strategic Partnerships) and Small-scale Partnerships (a novelty action aimed at grass-root organisations) – could be directly impacted in a tangible way by the digital transformation.

In concrete terms, for the call years 2021 and 2022 at programme level, 2.536 Key Action 2 projects in the field of school education, addressing the horizontal priority on digital transformation, were submitted, with 605 among them awarded funding.

## **2. EU financial support's contribution to the digitalisation of schools**

### **EU-financed actions and national strategies for the digitalisation of schools**

The 2018 Digital Education Action Plan was the European Commission's first policy initiative on digital education since the 2013 Communication on Opening up Education<sup>1</sup>. Its implementation influenced national policies and initiatives on digital education in a number of Member States (e.g. Belgium, Bulgaria and France)<sup>2</sup>. The Digital Education Action Plan 2021-2027 stems from a mandate to update and reinforce the ambition to support education in the digital age, as announced by President von der Leyen in the 2019 political guidelines. Adopted in September 2020, it is a renewed policy initiative that sets out a common vision of high-quality, inclusive and accessible digital education in Europe. Its duration is aligned with the 2021-2027 programming period. The Digital Education Action Plan is aligned to the role of the Commission in Education, which is to contribute to the development of quality education by encouraging cooperation between the Member States and by supporting and supplementing their action.

In 2020, 15 Member States received a country-specific recommendation related to digital education in general. When proposing these recommendations, the Commission took the objectives of the Digital Education Action Plan into account. Reforms and investments planned by Member States

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<sup>1</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on Opening up Education: Innovative teaching and learning for all through new Technologies and Open Educational Resources. COM/2013/0654 final.

<sup>2</sup> The 2018 Action Plan influenced the 'Education for Tomorrow' programme in Bulgaria and the digital education strategy of Belgium and France. In France, a number of national initiatives were inspired by the 2018 Action Plan, which also triggered inclusion of digital competence across the curricula, development of a digital competence framework, reinforced support on science, technology, engineering and mathematics. Furthermore, the 2018 Action Plan inspired a Hungarian request for structural reform support (under the SRSS) on the digital transformation of the Hungarian higher education sector.

under the Recovery and Resilience Facility (RRF) must be consistent with the country specific recommendations.

The cohesion policy funds in 2021-27 will continue to support the digitalization of schools according to the priorities, challenges and expected outcomes identified by the respective Member States and regions. The new legislative framework has been improved and requires Member States to have strategic policy frameworks for education and training systems in place, which covers the dimension on the digitalization of schools and to which supported EU interventions have to contribute.

Additionally, as part of the Action Plan, the Commission launched a Structured Dialogue with Member States on digital education and skills. This is a process of exchange on digital education and skills between the Commission and the Member States, under the principle of ‘whole government approach’ –a National coordinator ensures participation of all the relevant ministries, organisations and initiatives. The Structured Dialogue involves bilateral meetings between Commission services and the member state, meetings of a high-level group of national coordinators for digital education and skills, and discussions in relevant Council formations. This will be followed up through two proposals for Council Recommendations on the two strategic priorities of the Action Plan, to be adopted in spring 2023.

### 3. Gigabit connectivity in schools

The Covid-19 pandemic put the spotlight on the acute need for everyone to have a good internet connection - at home as well as in educational institutions such as schools - as a necessary condition for the digital transformation in education.

Even before the pandemics, a comprehensive survey carried out by the Commission in 2018 (2nd Survey of Schools: ICT in education- ESSIE2) showed some important gaps : a) the share of students attending schools who were equipped with ultra-fast-speed access to internet above 100 Mbps was rather low, b) there was a significant share of schools connected to internet speeds below 5 Mbps, c) large differences between and within European countries prevailed: whereas Nordic countries were clear frontrunners regarding the deployment of very high-speed access to Internet in schools, other countries and schools located in villages/small cities (as compared to bigger cities) clearly were lagging behind.

The crucial importance of connectivity was reiterated in the Digital Education action Plan 2018-2020 and again in the Digital Education Action Plan 2021-2027. To improve connectivity, the EU has taken vast action in a range of areas, which benefitted also many educational institutions, schools, teachers and pupils.

### 4. Expected results and financing under the RRF<sup>3</sup>

The Recovery and Resilience Facility (RRF) **milestones and targets** are “measures of progress”<sup>4</sup> which the Member States must achieve to unlock disbursements. More than 6000 unique milestones and targets have been set by the Council, reflecting the specificity of more than 2400 reforms and investments across the 27 Recovery and Resilience Plans (RRPs). Milestones and targets generally measure progress or completion of implementation, not the *impact* of a measure<sup>5</sup>. The use of impact indicators would not be suitable given the limited timeframe for implementing the RRF, and the time

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<sup>3</sup> SR Executive Summary IV; Paragraph 53-55; Box 3-5; and Conclusions 88

<sup>4</sup> Regulation (EU) 2021/241 (RRF Regulation), Art. 2(5)

<sup>5</sup> SR Executive Summary IV

lag and uncertainty that using impact indicators would create between the effective implementation of measures and disbursements. This is fully in line with the requirements of the RRF Regulation.

The **actual costs** Member States incur in implementing specific RRF measures may differ from the initial cost estimates submitted by the Member States.<sup>6</sup> The Commission recalls that both the financial allocation to a Member State and later disbursements to the Member State, relate to the RRP overall, not to individual measures. In its initial assessment of the RRP, the Commission assesses whether the Member States' cost estimate for the RRP overall is 'reasonable and plausible'. The rating for all Member States' RRP on the costing criterion was a 'B', reflecting overall reasonability and plausibility but some remaining uncertainty in the costing evidence or assumptions for one or more measures. The overall cost estimate is one factor used to determine the financial allocation to the Member State, but has no direct bearing on later disbursements which, according to the design of the Facility, depend on the delivery of the agreed milestones and targets rather than actual costs.

This is a core feature of the RRF as a performance-based programme: while the expected ambition (implementation of reforms and investments, as measured through milestones and targets) is set and must be achieved to unlock disbursements, the Member States bear the risk of higher cost but also the upside of actual costs being lower than initially estimated. Performance-based financing therefore rewards efficiency. The Commission notes that the ECA in its previous special report 21/2022 on the RRP assessment process found that "*The Commission's assessment of the estimated total costs of the recovery and resilience plans was appropriate.*" This assessment by the ECA was based on an examination of 42 measures of 6 RRP, including one measure examined for this audit.

Concerning the **retroactive inclusion of measures** already planned or started before the Member States' RRP were adopted, this is an explicit and intended feature of the RRF: The RRF Regulation foresees the explicit possibility that Member States can include measures taken since February 2020 (i.e. the start of the Covid-19 pandemic) in their RRP. This retroactivity clause allowed Member States in the face of the Covid-19 crisis to immediately take action at a scale not possible without the RRF, with the understanding that the measures would later be supported through the RRF. The Commission considers that the possibility for retroactive inclusion of measures is an intrinsic feature of the RRF that has significant added value.

### III. COMMISSION REPLIES TO THE RECOMMENDATIONS OF THE ECA

#### **Recommendation 1 - Promote EU actions under the Digital Education Action Plan more actively and enhance impact of strategic partnerships**

**Target implementation date: by the end of 2024**

**The Commission accepts the recommendation.**

The Commission has launched the implementation of the Digital Education Action Plan in 2021. All actions of the Action Plan are and will be supported by dedicated awareness raising campaigns, targeted communication through social media and events, and engagement with Member States. The

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<sup>6</sup> SR Paragraph 55 and conclusions 88

Commission will also enter into a further dialogue with Member States in view of addressing the concerns of this report, in particular through the two Council recommendations on digital education and skills to be adopted in 2023.

Also in 2022, the Commission launched the Digital Education Hub and, within it, a specific network of National Advisory Services which will facilitate exchanges with practitioners on matters related to the implementation of digital education policy.

Strategic partnerships contribute significantly to the priorities of the programme, bringing positive and long-lasting effects on the participating organisations, on the policy systems as well as on those directly or indirectly involved in the organised activities, thereby resulting in the development, transfer and/or implementation of innovative practices at organisational, local, regional, national or European levels. In order to foster the impact of such partnerships, their results will be further promoted through our Educational Platforms, namely e-Twinning, ESEP, and the European Education Area (EEA) Portal.

## **Recommendation 2 - Link EU funding more closely to objectives, needs and expected outcomes for schools**

**Target implementation date: by the end of 2027**

**2a) The Commission should take action, where appropriate in close cooperation with the member states, to strengthen the link between the objectives of the Digital Education Action Plan, EU support, and national or regional strategies for the digitalisation of schools**

**The Commission accepts recommendation 2.a).**

In 2022, the Commission has already organised a Structured Dialogue with Member States with the aim to increase ambition at EU level in the digital transformation of education and training systems in an integrated, coherent and strategic way. To support this process, the Commission has set up a High-Level Group of National Coordinators on Digital Education and Skills, which reflects a whole-government approach (with national representatives from different ministries such as education, labour, finance, infrastructure, etc). In the framework of this dialogue with Member States, the Commission sought to strengthen the link between the objectives of the Digital Education Action Plan, EU support, and national or regional digital education strategies.

To support this ambition further, in 2023 the Commission is working on developing two proposals for Council Recommendations: one on the enabling factors for digital education such as connectivity, infrastructure, digital equipment, content; and a second on improving the provision of digital skills for all stages of education and training (primary, secondary and tertiary including vocational education and adult learning). The two recommendations reflect the two strategic priorities of the Digital Education Action Plan, respectively. They will provide specific means for the Commission to work in closer cooperation with member states and identify ways to strengthen the link between the objectives of the Action Plan and national or regional strategies.

Finally, the Commission will perform a mid-term review of the Action Plan by early 2024 to draw lessons from implementation so far and inform of possible improvements.

**2b) The Commission should take action, where appropriate in close cooperation with the member states, to strengthen the link between EU support for the digitalisation of schools and clearly defined objectives, needs and scalable outcomes for schools**

## **The Commission accepts recommendation 2.b).**

The Commission welcomes the recommendation and will take into account in its implementation the different management roles of relevant EU funding programmes and the supporting competences of the EU in the field of education.

In the case of cohesion policy funds, the Commission also notes that changes in the 2021-2027 period ensure stronger correspondence between the objectives, needs and scalable outcomes for schools. To ensure the effectiveness of EU support, the new framework of enabling conditions<sup>7</sup> for the 2021-2027 period requires Member States and regions to have a relevant national or regional strategy covering all investments in education, including measures relevant to quality of education, implicitly covering digital education, before relevant expenditure is reimbursed. Moreover, specific project selection criteria provisions<sup>8</sup> ensure that cohesion policy-supported operations, including those relevant to the digitalization of schools, are embedded in the corresponding strategies identified for the fulfilment of the above enabling condition.

The Commission will also continue to support Member States and regions by raising awareness of ERDF and ESF+ Managing Authorities and, where appropriate, Monitoring Committees on opportunities to further strength the strategic synergies between available Cohesion policy funding and initiatives stemming from the Digital Education Action Plan in view of addressing objectives, needs and expected outcomes for schools in this area. In particular, the Commission will disseminate the upcoming Council Recommendations in the Common Provisions Regulation (CPR) Expert Group, where Member States are represented in the context of various EU funding programmes, including the European Social Fund + and the European Regional Development Fund.

## **Recommendation 3 – Monitor and encourage achievement of connectivity targets for all schools**

**Target implementation date: by the end of 2025**

**3a) The Commission should set up a mechanism to periodically collect up-to-date data for monitoring the actual connectivity of schools, and report on the outcome**

**The Commission accepts recommendation 3a)** and agrees with the need to collect such data to inform policy-making in the area of digital education. In the past, the Commission already carried out two extensive surveys (Survey of Schools: ICT in education) that benchmarked, among other topics, progress in the uptake of connectivity at Member State level.

Given that there is still no systematic collection of such data by Member States in place, and the data collected is not comparable, the Commission will follow-up on this work with the aim to set up a mechanism to periodically collect up-to-date data for monitoring the actual connectivity of schools. The Commission intends to propose this mechanism in the upcoming proposal for a Council Recommendation on key enabling factors for digital education and training (to be adopted in Spring 2023). More precisely, the Commission intends to collect a first set of data by 2025, by conducting a survey that would build on and further develop the Survey of Schools, which would also include questions on schools' connectivity, together with other questions on digitalisation of schools. Given that the Commission needs sufficient time to set up the mechanism to conduct the survey and collect the data, and a proper

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<sup>7</sup> Regulation (EU) 2021/1060 (Common Provisions Regulation) article 15 and Annex IV (thematic enabling condition 4.3 – Strategic policy framework for the education and training system at all levels).

<sup>8</sup> Regulation (EU) 2021/1060 (Common Provisions Regulation) art 73.



analysis of the data requires time, the Commission will likely report on the results of this survey in 2026. Moreover, the Commission further intends to repeat this type of survey at **periodic** intervals in the future – the frequency of intervals will be dependent on discussions in Council.

### **3b) The Commission should encourage Member States to connect all schools to gigabit internet by 2025**

#### **The Commission accepts recommendation 3b).**

In the Structured Dialogue on Digital Education and Skills, which the Commission held with Member States in 2022, the need for improved connectivity for schools and the lack of strategic focus of investments was already identified as one of the key challenges for developing high-performing digital education ecosystems.

The Commission intends to put forward a proposal for a Council Recommendation on key enabling factors for digital education (spring 2023) that would include a recommendation to Member States regarding the need to promote investment in high-speed internet connections to achieve 100% high-speed (Gigabit or higher) internet connectivity for all education and training institutions. The Commission intends then to follow-up on this Council recommendation by encouraging Member States via the different working groups that are in place in the area of digital education (e.g. the DELTA working group) to promote investments in high-speed internet connections for all education and training systems.

Moreover, the Commission can also continue to support Member States by raising awareness of ERDF and ESF+ Managing Authorities and, where appropriate, Monitoring Committees on relevant initiatives stemming from the Digital Education Action Plan. In line with the reply to the recommendation 2, the Commission places the CPR Expert Group at the disposal for the dissemination of the upcoming Council Recommendations.