

As a trade union focused on education, we view this initiative from a set of core values (quality education for every child, good working conditions for teachers - working conditions are learning conditions -, teachers as autonomous professionals, and education as a public good in a free democratic society) that constitute our organization. Our remarks on the EC initiative and the response by ETUCE is based on these cornerstone values, and is as follows:

- Education plays a key role in our society. It entails striving for a broad formation for every student and has an immense innovative and emancipating strength. Every child should be entitled to a high quality education that aims to bring out the best in every student and learner. Introducing AI in our education systems can provide benefits for our teachers and students, as it opens up new possibilities and has the potential to make teaching and learning more personal. But introducing AI in education doesn't come without risks. Therefore it is of utmost importance that legislation is put in place so that every actor in our educational environment, and with extension our entire society, is protected and can fall back on a legislative framework. A good legislative framework will ensure a level playing field for all actors, and offer transparency for everyone involved. Introducing AI in education cannot undermine the equal access to quality education, which is a human right. As the ongoing Corona-pandemic has shown, digitalization has enhanced the inequalities in education (OECD, 2021), so this risk is real, not potential or plausible. Therefore we believe the EC should take the lead in developing clear and binding measures, which should include but not be limited to ethical guidelines that address the risks that AI poses concerning transparency, accountability, intellectual property rights, data privacy, cyber-safety, equality and environmental protection.

- The introduction of AI in education will signify a change in the work environment and the working conditions of teachers. Since we, as an organization, sincerely believe that the working conditions of teachers are of the utmost importance and form an integral part of the learning conditions of children and students, we think it is necessary to regard teachers as autonomous professionals. Teachers should be respected as masters of their craft, who know better than anyone else what is needed in education. The Corona-crisis has shown again that there is a big social value to education, and this social part is an integral segment of the quality of education. AI cannot and should not replace teachers, but should be seen as an aid to teachers. Consequently, it is important that teachers are included in the development of AI in all its aspects regarding education, and that they are represented by their representative organizations in this process. Therefore the social partners have to be included in the governance regarding AI in education. As teachers are the ones who have to work with it and implement it in their every practices, involving them as equal partners from the start will only improve both the transition to a more digital educational environment and the quality of the digital tools that will be used. It will also make teachers – as end-users – more familiar and at ease in using AI in their teaching practice.

- To ensure that teachers can work as autonomous professionals, the guidelines regarding AI in education need to have a segment embedded that focusses on the need and realization of extended professionalization of the digital skills of teachers. We see this professionalization as twofold: it is clear that teachers need the necessary technical digital competences, and these should be part of the further professionalization of teachers, but we also find it of the utmost importance to include ethical awareness and critical thinking. Teachers need to have the tools to make conscious, deliberate choices when including AI in their teaching. This means that teachers should be involved in the process, and not be reduced to the role of executors of what others decide. Teachers get to decide how and when to use AI and digital tools, not the other way around.

- Education, as a human right, is a public service that should provide quality formation for every student, regardless of means and family situation, and therefore needs to be funded with public

resources, not private funds. The increasing degree of digitalization and AI in education have made education an interesting market for companies, who want to make a profit. This poses a real danger for privatization, commercialization and monopolization, all of which endanger the equal access to education. The EC must ensure that local governments do not disregard their duties and take up their role in providing funds so that education remains a public good that can't be dictated by EdTech companies. In providing a framework, governments can ensure that there is a level playing field, which should help against monopolization. The government needs to help to ensure that AI and the companies behind it work to the benefit of the schools, students and teachers, so that AI adapts to the educational system, instead of education catering to AI and Edtech companies. AI should become a useful tool for schools, students and teachers; they cannot become a money-tool for AI and the companies behind it.