

The Open European University

D1.3: OpenEU policy for Ethical and Green Digital Practices

September 2025

Version number: 01

Version History

Version	Date	Sections	Change Description
01	16/09/2025	All	Approved Version

Prepared by	Reviewed by	Approved by
WPL, 02/07/2025	WP1B, 02/09/2025	Exbo, 16/09/2025



This project has received funding from the European Union (EUROPEAN EDUCATION AND CULTURE EXECUTIVE AGENCY - EACEA) under grant agreement No 101177241.



Executive Summary

This policy outlines OpenEU's strategic approach to integrating ethical and environmentally sustainable digital practices across the OpenEU consortium and the higher education sector. It responds to the urgent dual challenge of climate change and accelerating digital transformation, which is reshaping digital education, research, and administration across universities. Without coordinated action, digital innovation risks reinforcing inequities, compromising data privacy, harming (social) inclusion and deepening environmental harm.

To address this, the policy defines a shared ethical, inclusive, and green framework for digital transformation. It promotes compliance with EU regulations (including the GDPR and emerging AI standards), the integration of UN Sustainable Development Goals (as outlined in the European Green Deal and Agenda 2030), and alignment with the Digital Decade strategy for a secure, inclusive, and sustainable digital future (Europe's Digital Decade: digital targets for 2030).

The policy has four core objectives:

- 1. Safeguard privacy and promote ethical governance in digital education, research, and administration.
- 2. Advance green IT through sustainable procurement, energy-efficient infrastructures, and circular economy practices.
- 3. Support collaboration among OpenEU partners to develop shared guidelines and accountability tools.
- 4. Ensure alignment with EU sustainability and digital inclusion goals.

The scope of the policy includes all digital operations in teaching, research, and institutional management. Proposed solutions include institutional codes of conduct, ethics review boards, training in digital ethics, sustainable infrastructure planning, and shared reporting mechanisms.

The anticipated outcome is a resilient, responsible, and future-ready Open European University. By leading with ethics and sustainability, OpenEU aims to influence broader systemic change in European higher education and set a benchmark for institutional digital responsibility.



Contents

E.	xecutive Summary	1
С	ontents	3
1.	Purpose and scope	5
	1.1 Introduction	5
	1.2. Purpose	5
	1.3. Scope	6
2.	Framework of action	8
	2.1 Alignment with relevant EU policies	8
	2.2 Cultivate a Shared Culture of Understanding and Responsibility in Data Usage	10
	2.3 Promote a greener and socially responsible Alliance	11
3.	. Roles and Responsibilities	13
	3.1 Executive Board and WP1 board members	13
	3.2 Digital Sustainability key person in each institution	13
	3.3 WP1 board members	13
	3.4 Procurement Officers	13
	3.5 Accessibility and Inclusion Officers or key contacts	13
	3.6 Training and Capacity Building Teams	13
	3.7 Community Engagement Coordinators and WP7 board members	14
4.	. Approval	14
5.	. Appendix	15
	51 Pafarancas	15



1. Purpose and scope

1.1 Introduction

Digital transformation is rapidly reshaping higher education, creating new opportunities for innovation in digital education, research, and administration. Yet, alongside these opportunities come complex ethical, legal, and environmental challenges that demand thoughtful and coordinated responses.

The OpenEU initiative acknowledges the urgent need to ensure that digital development across partner institutions is firmly grounded in principles of ethical responsibility, environmental sustainability, and social inclusion. This policy has, thus, been developed in response to the above-mentioned challenges and is aligned with key European frameworks, including the General Data Protection Regulation (GDPR), the Artificial Intelligence Act, the European Green Deal, and Europe's Digital Decade: digital targets for 2030.

OpenEU is committed to leading by example in fostering a responsible, inclusive, and ecologically conscious digital framework for higher education. Going forward, we will work collaboratively to align with relevant European policies, ensuring that all partner institutions embrace shared values and objectives. Our joint efforts will focus on ethical governance in digital education, research, and administration, supported by meaningful stakeholder engagement and a commitment to continuous improvement and collective responsibility.

This document is a living policy—subject to ongoing revision as we implement new objectives and integrate lessons learned. It reflects our shared vision and foundational principles for what ethical and environmentally sustainable digital practices should encompass within the European higher education landscape.

1.2. Purpose

The purpose of this policy is to establish a shared ethical, inclusive, and green digital framework for all OpenEU partner institutions. It aims to:

- Promote ethical governance in digital education, research, and administration by safeguarding data privacy, ensuring transparency, and fostering accountability.



- Support the integration of sustainable digital practices through green IT procurement, energy-efficient infrastructure, and circular economy practices.
- Align institutional digital strategies with the European Union's broader goals for climate neutrality, digital inclusion, and trustworthy technologies.
- Encourage collaboration, capacity building, and stakeholder engagement to drive continuous improvement and shared responsibility.

By articulating clear principles and practical guidelines, this policy serves as both a strategic roadmap and an operational tool for guiding responsible digital transformation.

1.3. Scope

This policy applies to the OpenEU Alliance as a whole, promoting alignment among its member organisations. It does not impose directives on individual universities but offers a collaborative framework to guide joint actions.

Additionally, it extends to projects related to the Alliance, facilitating coordinated efforts across various initiatives.

This policy applies to all digital practices, covering the following domains:

- Digital Education: Including the design, delivery, and evaluation of online, hybrid, and technology-enhanced learning environments.
- Digital Research: Encompasses data management, AI-driven research methods, and the use of digital infrastructures in research activities.
- Digital Administration: Covering institutional data systems, automation processes, cloud computing, and administrative technologies.

The policy addresses both technical and human dimensions of digital transformation, recognising that ethical and sustainable change requires institutional culture shifts, staff development, and ongoing stakeholder dialogue. It is designed to be adaptable to local contexts while ensuring alignment with shared European values, the Agenda 2030 and the UN Sustainable Development Goals (SDGs).



2. Framework of action

2.1 Alignment with relevant EU policies

What	Promote alignment with relevant EU policies related to ethical and environmentally sustainable digital practices.
Who	WP1 Board, OpenEU Executive Board, Partner institutions at a governance level
2028 Objective	In the OpenEU activities, OpenEU partners will have full alignment with the OpenEU ethical and environmentally sustainable digital plan.
How	 WP1 will develop and validate the OpenEU ethical and environmentally sustainable digital plan. OpenEU partners will annually fill-in a survey on ethical and environmentally sustainable digital practices. This survey will help to benchmark existing practices and will help guide partner institutions into a shared list of objectives. Based on filling in the survey each partner will have to self-evaluate itself and set key actions to improve its commitment to the plan. For the subsequent year, actions will need to be implemented and monitored. All OpenEU activities should adhere to key objectives identified in the Ethical and Environmentally sustainable digital plan.
What	Promote the alignment with relevant EU policy related to ethical and environmentally sustainable digital practices.
Who	Partner institutions at a governance level. WP1 board members to ensure annual monitoring of partners filling in the survey and monitoring planned actions implementation.



2028 Objective	In the OpenEU activities, OpenEU partners will have full alignment with ethical and environmentally sustainable digital practices.	
How	 WP1 will develop and validate the OpenEU ethical and environmentally sustainable digital plan. OpenEU partners will annually fill-in a survey on ethical and environmentally sustainable digital practices. This survey will help to benchmark existing practices and will help guide partner institutions into a shared list of objectives. Based on filling in the survey each partner will have to self-evaluate itself and set key actions to improve its commitment to the plan. For the subsequent year, actions will need to be implemented and monitored. All OpenEU activities should adhere to key objectives identified in the OpenEU Ethical and Green Digital plan. 	
Regulatory or internal frameworks	 The General Data Protection Regulation. The EU Artificial Intelligence Act. OpenEU Inclusive Gender Equality Policy and Plan (2025). The EU Declaration on Digital Rights and Principles. 	

2.2 Cultivate a Shared Culture of Understanding and Responsibility in Data Usage

What	To address fragmented data practices, varying levels of data
	literacy, and the need for ethical, inclusive, and sustainable
	use of data, it is essential to encourage collaboration, build



	capacity, and engage stakeholders to drive continuous improvement and shared responsibility.	
Who	Partner institutions at an operational level. WP1 board members to ensure annual monitoring of partner initiatives.	
2028 Objective	OpenEU Alliance will have established a cross-institutional culture of shared responsibility and informed understanding of data usage—grounded in ethical principles, sustainability and digital citizenship—through co-created activities, inclusive capacity-building, and participatory data governance frameworks	
How	 Organise co-creation workshops about Ethics and Data Protection including students, faculty, IT, leadership. Develop a shared Data Ethics Charter for the OpenEU. Develop a shared AI usage toolkit for students and staff. Empower all internal stakeholders to understand and act responsibly with data. Foster Participatory Data Governance, including cross-institutional Data Ethics Council (students + staff). 	
Regulatory or internal frameworks	 The General Data Protection Regulation. The EU Artificial Intelligence Act. The EU Declaration on Digital Rights and Principles. The EU Digital Education Action Plan (2021–2027). 	



2.3 Promote a greener and socially responsible Alliance

What	The OpenEU Alliance will actively model and implement environmentally sustainable and socially just digital practices across OpenEU beneficiaries—ensuring that digital transformation aligns with ethical values, social inclusion, environmental sustainability and social responsibility and the United Nations Sustainable Development Goals.	
Who	Partner institutions at a strategic and operational level. WP1, WP2, WP3, WP4, WP5, WP6, WP7 and WP8 boards when dealing with OpenEU tasks.	
2028 Objective	The OpenEU Alliance will become a model of ethical, environmentally sustainable, and socially inclusive digital transformation - by reducing the ecological footprint across all partner institutions particularly in those areas leading to digital transformation, ensuring equitable access to digital education and tools, and embedding green and ethical practices in governance, pedagogy, research and innovation.	
How	 Assess and Reduce Ecological Footprint, particularly in OpenEU activities. Develop and Enforce Green and Ethical Digital Policies by co-creating alliance-wide guidelines for sustainable digital practices and social responsibility. Enhance Digital Accessibility and Inclusion. Build Capacity through Training and Awareness. Foster Partnerships and Community Engagement by collaborating in OpenEU activities with local communities, NGOs, and social economy organizations on digital inclusion and environmental sustainability initiatives. Ensure procurement follows thorough low-impact practices by prioritizing shared green infrastructures and responsible sourcing. 	



	- Monitor the implementation of environmentally sustainable and socially just digital practices across partner institutions.
Regulatory or internal frameworks	 UN Sustainable Development Goals. The EU Declaration on Digital Rights and Principles. The European Green Deal. OpenEU Inclusive Gender Equality Policy and Plan (2025).

3. Roles and Responsibilities

3.1 Executive Board and WP1 board members

Provide overall strategic guidance and oversight for the implementation of the policy for Ethical and Green Digital Practices. Ensure adequate resources and institutional commitment. Evaluate progress through KPIs and coordinate reporting and dissemination activities.

3.2 Digital Sustainability key person in each institution.

Lead and coordinate ecological footprint assessments and initiatives locally. Collaborate across institutions to share data, tools, and best practices. Report progress and challenges to the OpenEU WP1 board member of its institution.

3.3 WP1 board members

Develop, review, and update the green and ethical digital policies for the Alliance. Ensure policy review aligns with EU directives, SDGs, and social inclusion mandates. Monitor policy implementation and compliance across partner institutions and facilitate coordination between institutions to ensure policy consistency.

3.4 Procurement Officers

Implement responsible procurement practices aligned with green and low-impact criteria. Evaluate vendors and technologies for sustainability certifications and



social responsibility. Coordinate with the Digital Sustainability key person to prioritise shared green infrastructures and key actions.

3.5 Accessibility and Inclusion Officers or key contacts

Ensure all OpenEU digital content and resources meet accessibility guidelines.

Advocate for and monitor the inclusion of marginalised groups in digital education initiatives.

3.6 Training and Capacity Building Teams

Design and deliver training modules and co-lead workshops on digital sustainability, ethics, and social responsibility. Develop microcredentials and certification paths for staff and students.

Coordinate awareness campaigns and resources hubs to promote sustainable digital practices.

3.7 Community Engagement Coordinators and WP7 board members

Build and maintain partnerships with local communities, NGOs, and social economy actors. Facilitate service-learning and civic engagement projects related to sustainability and digital inclusion.

4. Approval

This policy has been approved in accordance with the provisions of the OpenEU Governance Framework Guidelines and rules (D1.1_A). The body responsible for the application and revision of this policy is the Executive Board, which approved this policy on 16 September 2025 and is responsible for its constant supervision. Moreover, the text of this policy will be revised when there are significant changes in relevant national or international guidelines or legislation. Protocols will also be generated for the monitoring and measurement of the objectives. The purpose of this revision is to ensure the validity, continuity and compliance of this policy.



5. Appendix

5.1 References

European Commission. (2020). The European Green Deal.

https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

European Commission. (2021). The Digital Education Action Plan (2021–2027).

https://education.ec.europa.eu/focus-topics/digital-education/action-plan

European Commission. (2022). Declaration on digital rights and principles for the digital decade.

https://digital-strategy.ec.europa.eu/en/library/european-declaration-digital-rights-and-principles

European Parliament and Council of the European Union. (2016). Regulation (EU) 2016/679: General Data Protection Regulation (GDPR).

https://eur-lex.europa.eu/eli/reg/2016/679/oi

European Parliament and Council of the European Union. (2024). Regulation (EU) 2024/1124: The Artificial Intelligence Act.

https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

Moreno Pires, S., Mapar, M., Nicolau, M., Patrizi, N., Malandrakis, G., Pulselli, F. M., ... & Galli, A. (2022, September). Teaching sustainability within the context of everyday life: Steps toward achieving the Sustainable Development Goals through the EUSTEPs Module. In Frontiers in Education (Vol. 7, p. 639793). Frontiers Media SA.

United Nations. (2015). *Transforming our world: The 2030 agenda for sustainable development* (A/RES/70/1). https://sdgs.un.org/2030agenda

OpenEU Alliance. (2025). OpenEU Inclusive Gender Equality Policy and Plan (2025).