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BRIDGE Guidebook

BRIDGE : Building Responsible Internet Discipline through Gamified Education for Immigrant Women

Co-funded by the European Union

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For reasons of readability, this document does not use gender asterisks, colons or the internal 'I'. Regardless of this, the authors of this handbook attach great importance to cooperation in the sense of equality and diversity. If a neutral phrasing was not possible or when using the generic masculine, this includes all people regardless of their gender identity.

01 Introduction

1.1 Purpose and Scope of the Guidebook

Welcome to the **BRIDGE Guidebook** — your toolkit for making adult education safer, more inclusive, and ready for the digital age. This Guidebook was created to help adult education institutions (AEIs) take real, meaningful steps toward protecting data, promoting digital safety, and making sure no learner is left behind.

Why is this important?

Because in today's world, learning doesn't just happen in classrooms anymore. It happens online — on platforms, apps, and digital spaces where personal information is constantly shared. But many learners, especially immigrant women, seniors, and adults with limited education, face real barriers: lack of digital skills, fear of online fraud, or simply not knowing their rights. This Guidebook is here to change that.

Whats the purpose?

At its heart, this Guidebook has one clear goal: to support real change in how adult education deals with data privacy, digital safety, and online inclusion. We're not just talking about awareness — we're talking about action.

We want learners, educators, and other AE stakeholders to feel confident in making smart, ethical, and legally sound decisions when it comes to the use of digital technologies. That's why the Guidebook combines two key things:

1. **Knowledge** – the "why": clear explanations of the challenges and risks around digital safety, especially for vulnerable learners like immigrant women, older adults, and low-income groups. Furthermore to build awareness about why data privacy and digital safety matter so much — not just for legal reasons like GDPR, but as a basic human right.
2. **Practical tools** – the "how": like checklists, templates, real-life examples, and action plans. Whether you're a manager, educator, or policymaker, you'll find helpful resources to support safer and more inclusive online learning.

Why does this matter?

Digital safety is not just a technical issue or a legal checkbox — it's a **human right.** It affects whether someone can access education, find a job, take part in society, or feel safe online. And yet, many adult learners lack the digital skills, awareness, or confidence to protect themselves — or even understand their rights under laws like the **General Data Protection Regulation (GDPR).**

At the same time, many AE institutions lack the training, resources, or clear processes needed to address these challenges properly. That's where this Guidebook comes in. It doesn't just highlight the problem — it helps you **be part of the solution.**

What does it include?

Inside, you'll find:

- **An overview of the EU policy landscape**, including GDPR, DigComp, and DigCompEdu, and what they mean for adult learning providers.
- **Insights from real research** across five countries — including interviews with learners, educators, and managers — showing what's working and what still needs attention.
- **Concrete tools:** GDPR compliance checklists, self-assessment sheets, inclusivity guidelines, and digital safety action plans.
- **Case studies and best practices:** real-world examples of how organisations are already stepping up to meet these challenges.
- **Recommendations** for decision-makers on how to align national strategies with the needs of educators and learners on the ground.

Who is it for?

The Guidebook is tailored for anyone working in or managing an adult education institution — whether public, private, or NGO-based. It is especially useful for:

- **Learners** who want to better understand their rights and protect themselves in the digital world.
- **Educators** who need to feel more confident about integrating digital tools into their teaching while ensuring their students' safety.
- **Stakeholders** who are shaping the policies and practices within adult education institutions and want to ensure inclusivity and data protection are prioritised.

What makes it different?

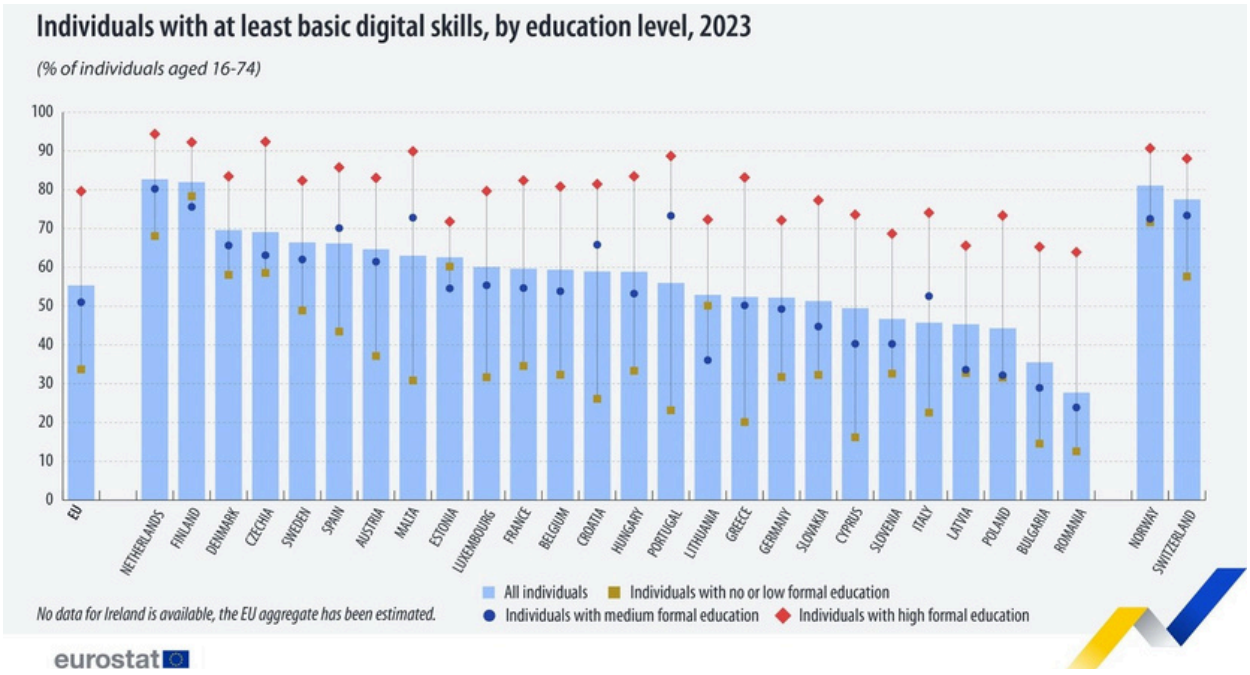
What sets this Guidebook apart is that it was built with the **people it serves**. The content is grounded in **field research and real voices** from Austria, Germany, Poland, Czechia, and Cyprus. It reflects not just theory, but the day-to-day realities, challenges, and needs of adult education institutions and the communities they serve.

It's also **action-oriented:** everything included is meant to be directly useful, applicable, and adaptable — whether you are running a small community centre or a large educational network.

1.2 Importance of Digital Safety and Inclusivity in Adult Education

> *"We urgently need to address the growing digital gender gap and put digital technology to work for those who need it most: the vulnerable, the marginalised, those living in poverty, and people suffering from discrimination of all kinds." – UN Secretary-General António Guterres*

In today's digital world, **access to technology and digital literacy** are essential for full participation in society. However, for many adults - particularly **vulnerable groups** such as **seniors, immigrant women** and **individuals with disabilities -** barriers to digital access and safety limit their opportunities for **education, employment,** and **civic engagement**.



Digital Skills by educational level (Eurostat, 2024)

In 2023, **only about half (55%) of people in the EU aged 16 to 74** had at least **basic digital skills**, showing that a large part of the population still lacks essential competences for participating in the digital world. However, these numbers vary greatly between countries (Eurostat, 2024). For example, while **83% of people in the Netherlands** had basic digital skills, in **Romania only 28%** reached this level (Ibid). Education plays a key role in developing digital competences. People with **higher levels of formal education** are much more likely to have basic digital skills than those with low education. Across the EU, **80% of highly educated individuals** had basic digital skills, compared to only **34% of people with low or no formal education** — a gap of **46 percentage points**. This gap is even wider in some countries, such as **Portugal (66 pp), Greece (63 pp),** and **Malta (59 pp)**, showing that digital inequality is strongly linked to educational background. On the other hand, countries like **Estonia (12 pp), Finland (14 pp), and Lithuania (22 pp)** show smaller gaps, suggesting more balanced access to digital skills across different education levels (Eurostat, 2024).

Cybercrime: The Dark Side of Today's Digital World and Digital Sapces

As cyberattacks continue to grow in complexity, they are affecting more sectors and communities than ever before. According to the EU Agency for Cybersecurity (ENISA), the most common threats today include system overloads that crash services (46%), ransomware attacks demanding payment to unlock data (27%), unauthorised access to sensitive information (16%), and other risks such as phishing, malware, and social engineering (11%). Whether you're an educator, adult learner, or community organisation, understanding these risks is essential for safe digital participation (ENISA, 2024).

Threats to Availability

Attacks that overload systems or networks, making services temporarily inaccessible.

Ransomware

Criminals block access to data or systems and demand payment to restore it or prevent leaks.

Threats to Data

Unauthorised access to sensitive or personal information, often used to harm, manipulate, or expose victims.

Social Engineering

Trickery-based attacks where victims are misled into revealing personal data or passwords.

Malware

Harmful software that infects devices, steals data, disrupts services, or monitors activity.

Supply Chain Attacks

Targeting smaller suppliers to infiltrate larger organisations through connected systems.

Who's Behind the Attacks?

Cyberattacks come from a range of actors. Some are state-linked groups aiming to spy or disrupt geopolitics. Others are cybercriminals chasing profit through scams or data theft. Private actors may build and sell cyberweapons, while hacktivists use hacking to promote political or social causes (ENISA, 2024).

Who Gets Targeted?

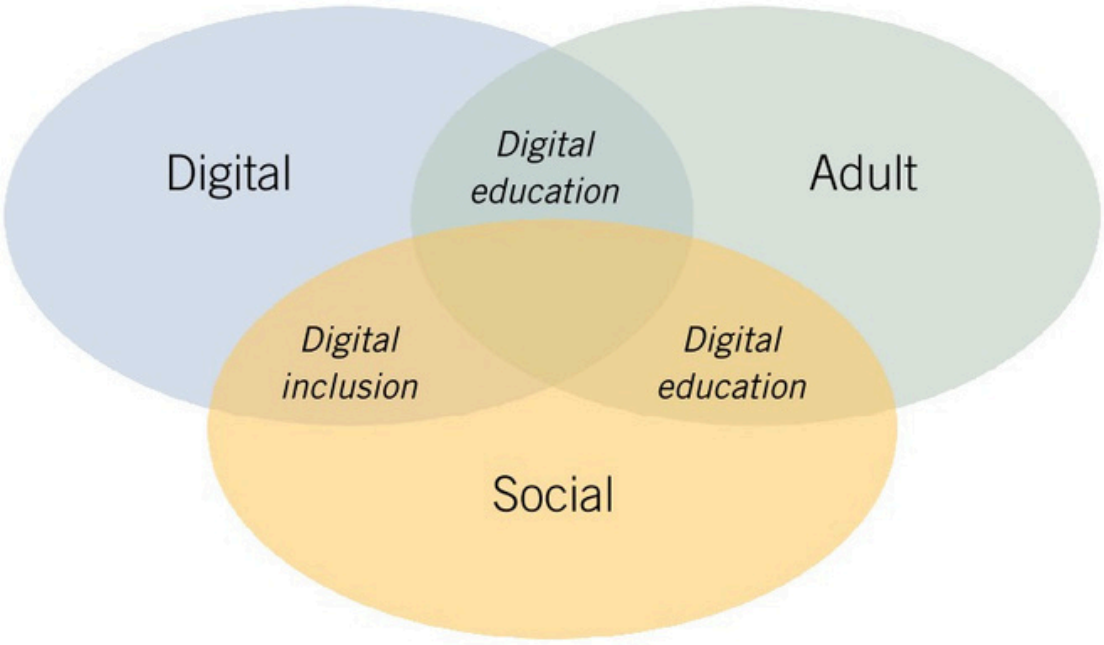
The most common targets include public administration (19%), followed by transport (11%), finance and digital infrastructure (9%), business services and the general public (8%), and manufacturing (6%). In short —critical systems and everyday users are both at risk (ENISA, 2024).

Why Digital Safety Matters for Everyone

These alarming statistics prove that no one is safe without proper knowledge of how to protect themselves online! Especially vulnerable are seniors, immigrants, and adults with low education. That's why digital safety and security need to be an essential part of adult education, because only those who know how to protect themselves can safely be part of the digital world!

Digital Inclusion in Adult Learning

Digital inclusion in adult learning connects three important areas: **technology, education, and social inclusion** *(International Training Centre, n.d.)*:



Framing digital inclusion within Adult learning (International Training Centre, n.d.)

There are many studies and discussions about how **digital technologies** are used in learning. Terms like **e-learning, technology-enhanced learning,** and **distance education** are often used in both general and adult education. Today, with the rise of mobile devices and the digital revolution, learning is no longer limited to specific places or times. Instead, learning can happen anytime and anywhere, making education **more flexible, learner-centred, virtual,** and **global** (International Training Centre, n.d.).

Also, **education and social inclusion** are strongly connected. Education is often seen as a **key factor in fighting social exclusion**, giving people opportunities to improve their lives. At the same time, digital technology can also promote social inclusion, a topic already well explored under terms like digital inclusion or e-inclusion (Ibid.).

However, the **specific role of digital inclusion in adult learning** is still not fully researched. Although some scholars have tried to define what **digital inclusion in education** means, more work is needed to understand and apply it in adult education (Ibid.). For example, Nguyen et al. (2020) identify three important aspects of digital inclusion in education (Ibid.):

1. **Motivational access** – whether people are willing and open to using technology.
2. **Material access** – having the necessary devices and internet connection.
3. **Usage access** – having the skills needed to use technology effectively.

1.3 Alignment with EU Priorities and Frameworks (e.g., GDPR, DigComp, DigCompEdu)

In today's connected world, adult learners – especially seniors, immigrant women, and people with disabilities – need support to navigate digital spaces safely and confidently (International Training Centre, n.d.). This discussion outlines key European frameworks that promote data protection and digital literacy and explains how they foster digital safety and inclusive education for vulnerable groups.

Overview of EU Frameworks

General Data Protection Regulation (GDPR)

The GDPR is the European Union's flagship law on data privacy. In effect since 2018, it replaced an older 1995 directive and **significantly expanded individuals' personal privacy rights in the EU**. GDPR requires organisations (including educational institutions) to handle personal data with great care – following strict principles like lawfulness, transparency, data minimisation, and security (Wolford, 2018). It also **gives people clear rights over their data**, such as the right to access their information, correct inaccuracies, or have data deleted (Ibid.). In adult education, this means that learners' personal details (for example, contact information or learning records) must be protected and used only for legitimate, agreed-upon purposes (Ibid).

Digital Competence Framework for Citizens (DigComp)

The **DigComp** project, initiated by the **Joint Research Centre** on behalf of the European Commission, **began in 2010** and has since gained significant recognition among EU Member States (European Commission, n.d.-b). Over the years, its role as a pan-European framework for shaping digital skills policies, assessing digital competence, and guiding digital literacy initiatives has been increasingly acknowledged (Ibid.).

In **DigComp**, digital literacy is defined as the following:

> *„confident, critical and responsible use of, and engagement with, digital technologies for learning, at work, and for participation in society. It is defined as a combination of knowledge, skills and attitudes" (European Commission: Directorate-General for Education, Youth, Sport and Culture, 2019)*

As a key component of the **EU's digital strategy**, **DigComp plays a central role** in advancing the objectives outlined in the **Digital Education Action Plan 2021-2027** (Ibid.). This, in turn, aligns with the broader Commission priority of creating *„A Europe fit for the Digital Age"* and contributes to the **Next Generation** EU initiative, which focuses on economic recovery and digital transformation (Ibid.).

The **DigComp framework** serves multiple functions across different sectors, including education, employment, and social inclusion (Ibid.). It is widely used for designing competence assessment tools, developing digital skills training programmes, and identifying professional digital profiles (Ibid.).

The Digital Competence Framework for Citizens identifies the **key components** of digital competence in **five areas** (European Commission, n.d.-a):

Competence Areas of the DigComp (European Commission, n.d.-a)

1. Information and Data Literacy
The ability to identify information needs, search for and access digital data, and evaluate the reliability and relevance of sources. It also includes organising, managing, and securely storing digital content and information (European Commission, n.d.-a).

2.Communication and Collaboration
Engaging in online interactions, communication, and teamwork while considering cultural and generational differences. This includes participating in digital society through public and private online services, exercising digital citizenship, and managing one's online identity, presence, and reputation (Ibid.).

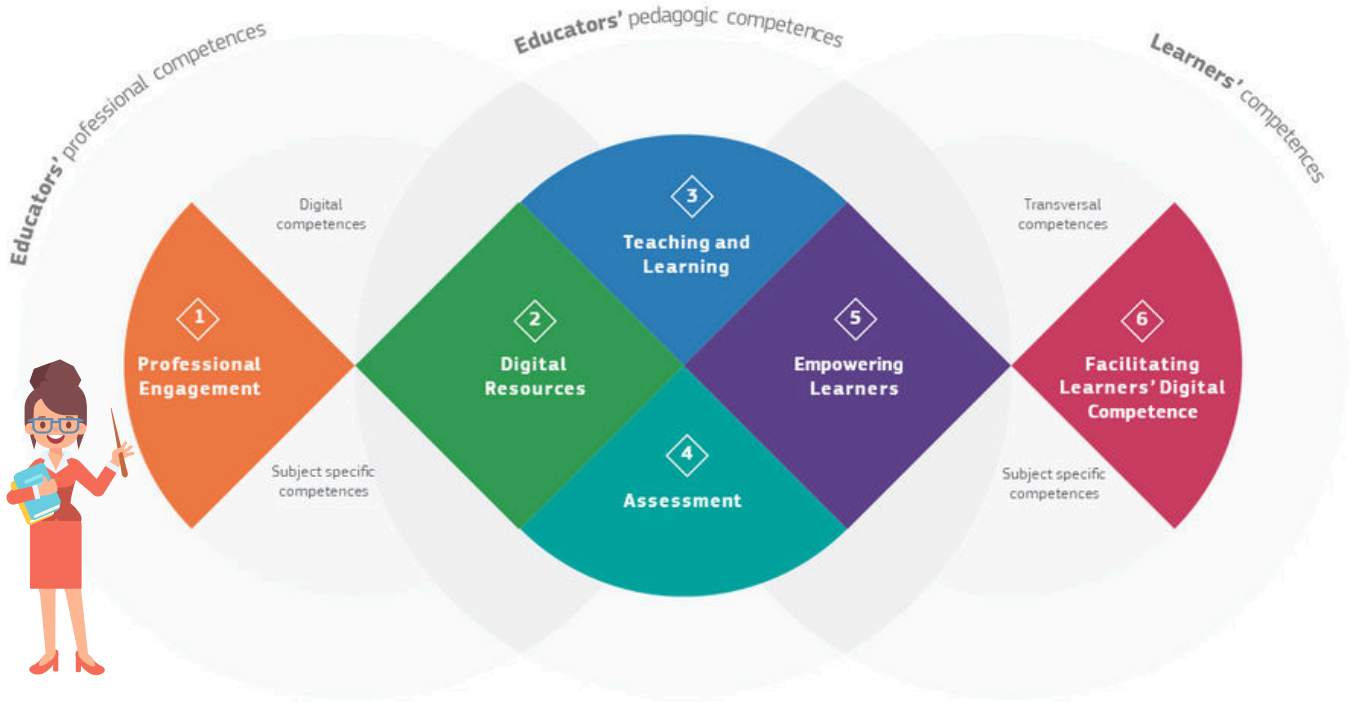
3. Digital Content Creation
Developing, modifying, and integrating digital content while adhering to copyright laws and licensing regulations. This also involves the ability to provide clear instructions to a computer system and contribute to the expansion of digital knowledge (Ibid.).

4. Safety
Ensuring the security of devices, personal data, and digital content while maintaining privacy in online environments. It also includes protecting physical and mental well-being, promoting social inclusion through digital tools, and understanding the environmental impact of technology use (Ibid).

5. Problem-Solving
Recognising and addressing challenges in digital environments by applying innovative solutions and digital tools. This competence also involves adapting to technological advancements and continuously updating one's digital skills (Ibid.).

Digital Competence Framework for Educators (DigCompEdu)

Developed by the **European Commission's Joint Research Centre** (JRC) on behalf of the Directorate-General for Education, Youth, Sport, and Culture (DG EAC), DigCompEdu aligns with broader European educational policies and aims to foster innovation, inclusivity, and digital readiness in education across Europe (Ibid.). The DigCompEdu framework outlines **22 key competences** categorized into six main areas (European Commission DigCompEdu, n.d.-b):



DigCompEdu Framework (European Commission DigCompEdu, n.d.-b)

Unlike traditional frameworks that focus on **technical proficiency, DigCompEdu emphasizes the practical application of digital technologies** to improve teaching methods, promote innovation, and create more engaging and inclusive learning experiences:

1. Professional engagement
2. Digital resources
3. Teaching and learning
4. Assessment
5. Empowering learners
6. Facilitating Learners' Digital Competence

Each of these **six areas represents a crucial aspect of educators' digital competence**, addressing both professional engagement and pedagogical practice (European Commission DigCompEdu, n.d.-a). Within this structure, the **22 key competences provide a more detailed breakdown**, offering specific skills and guidelines that help educators integrate digital technologies effectively into their teaching (ibid). These competences include, for instance, selecting and creating digital resources, managing and orchestrating the use of digital tools in teaching and learning, fostering learners' digital competence, and using digital technologies for assessment and feedback. Additionally, competences such as using digital tools for collaboration with colleagues and for reflective professional development underline the importance of continuous growth in a digitally evolving educational environment.

02

Research Insights

2.1 Methodology Overview (Primary and Secondary Research)

The methodology applied in the development of the National Reports within the BRIDGE project is grounded in a **mixed-methods research approach**, which combines **primary and secondary research** to ensure a comprehensive, multi-perspective understanding of the current state of digital safety, inclusivity, and GDPR compliance in Adult Education Institutions (AEIs). This dual approach was designed to capture both the **broader institutional and policy context** and the **lived experiences and specific needs** of educators, learners, and other key stakeholders, particularly focusing on vulnerable groups such as immigrant women.

Secondary Research (Desk Research)

The desk research component involved a systematic review and analysis of existing literature, legal frameworks, institutional policies, and relevant national and European initiatives addressing digital safety, GDPR compliance, and inclusivity in adult education. This phase aimed to identify current trends, good practices, gaps, and challenges in ensuring secure and inclusive digital environments within AEIs.
The sources consulted during desk research included:

- European frameworks and policy documents (e.g., GDPR, DigComp, DigCompEdu).
- National regulations and strategic documents on adult education and digital transformation.
- Institutional policies and guidelines adopted by AEIs with regard to digital safety and inclusion.
- Academic studies and scholarly publications focused on digital literacy, privacy, and the inclusion of marginalised groups in adult education.
- Case studies and examples of innovative practices from NGOs, public bodies, and educational organisations.

This phase provided a comprehensive background analysis, allowing each partner country to contextualize the field research findings and identify country-specific barriers and opportunities for fostering digital safety and inclusivity in adult education.

Primary Research (Field Research)

The **field research** phase was designed to complement desk research by gathering **empirical, qualitative, and quantitative data** from the key actors in adult education. It aimed to explore the practical realities, needs, and perspectives of educators, learners, and institutional stakeholders in relation to digital safety and inclusion, with a specific focus on immigrant women as a particularly vulnerable group.

Semi-Structured Interviews

Each partner conducted nine **semi-structured interviews,** distributed equally among three target groups to ensure a **holistic and multi-stakeholder perspective:**

- **Three interviews** with adult education **stakeholders** (e.g., policy-makers, administrators, institutional staff).
- **Three interviews** with adult education **educators**, including teachers, trainers, and mentors.
- **Three interviews** with **adult learners**, with an emphasis on immigrant women and marginalised adults.

In some instances, interviews were conducted as **focus groups** to facilitate a richer exchange of experiences and viewpoints. All interviews were guided by **predefined thematic questions**, provided in the official research guidelines, covering topics such as institutional practices for digital safety, GDPR compliance, inclusivity measures, and specific learning needs and barriers of vulnerable groups.

Interviews followed a **semi-structured format,** allowing flexibility to explore emerging themes while maintaining comparability across partner countries. Informed **written consent** was obtained from all participants prior to the interviews, and all ethical standards regarding confidentiality and voluntary participation were rigorously observed.

Online Survey

In parallel to the interviews, an **online survey** was implemented to **broaden the empirical data collection**, with a particular focus on reaching a larger group of adult learners, including immigrant women. The survey was primarily conducted in Poland and the Czech Republic, but was also disseminated in other partner countries as feasible. The survey sought to collect both **quantitative and qualitative data** on the following topics:

- Learners' experiences with **digital tools and online learning platforms**.
- Perceptions and challenges regarding **digital safety and data privacy.**
- Degree of **support and inclusivity** offered by AEIs.
- Individual **needs and recommendations** for improving digital education practices and access.

The target group of the survey consisted of **adult learners,** particularly those facing barriers to digital education, including linguistic, technical, and socio-economic obstacles. The goal was to gather a minimum of **15 responses per country**, aiming at a total of at **least 50 responses,** thereby ensuring a robust dataset for analysis.

Integration and Analysis of Data

The findings from both desk and field research were synthesized and analyzed in each **National Report**, following a **shared template and structure** to ensure consistency and comparability. By triangulating policy and literature analysis with empirical data from stakeholders and learners, the reports offer a holistic and evidence-based perspective on the state of digital safety and inclusivity in adult education in each partner country.

2.2 Key Findings from National Reports

This table presents a clear and structured overview of key findings from five countries, allowing for cross-country comparison on digital safety and inclusion.

Category	Austria	Germany	Poland	Czech Republic	Cyprus
Digital Safety and GDPR Compliance	GDPR mandatory, but awareness low. Cybercrime rising	GDPR well-regulated, but accessibility issues. Algorithmic discrimination affects migrants.	GDPR in place, but low awareness among migrant women.	GDPR in place, but many unaware of rights. Cyber fraud growing.	EU regulations apply, but weak enforcement in migrant communities.
Main Barriers	Language, financial limits, lack of devices. Many women struggle with GDPR.	Lack of multilingual GDPR resources, limited access, childcare responsibilities.	Language barriers, low digital skills, lack of GDPR resources, limited outreach.	Limited Czech skills, distrust, lack of money and tools.	Stigma, distrust of digital tools, poor internet access.
Training Gaps	Rare integration of digital safety in existing programmes. No hands-on cybersecurity.	Safety training often missing. Low confidence in online tools.	Few GDPR and safety programmes for migrant women. Lack of multilingual, real-life focused training.	Few programmes on digital safety & entrepreneurs hip for women.	Lack of workplace-oriented training. Low cybersecurity knowledge.
Insights from Interviews	Fear of fraud, need for multilingual, interactive methods.	Reliance on family, fear of cybercrime.	Fear of scams, limited trust, need for practical, hands-on training.	Fear of mistakes online, need for interactive training.	Fear of scams, confusion about GDPR.
Key Trends	Need for AI and safety integration. Focus on inclusive, safe learning.	Algorithmic bias harms migrant women's job access. More workplace digital training needed.	NGOs fill gaps, but scaling and coordination needed.	Gamified, community learning boosts engagement.	Workforce integration needs more digital literacy.

2.3 Common Challenges and Barriers in AEIs

Across Europe, Adult Education Institutions (AEIs) are working hard to bring digital learning to all — but one group continues to face an uphill climb: immigrant women. Despite the growing importance of online learning, many of these learners remain excluded due to a combination of language, access, and cultural barriers. So, what's really getting in the way?

1 Language: The First (and Biggest) Wall

Imagine trying to learn about online privacy, data protection, or even how to apply for a job — but everything is in a language you're still learning. That's the reality for many immigrant women in countries like Germany, Austria, and Poland. Most educational resources, platforms, and digital tools are only available in the national language. For recent arrivals or those with limited language skills, even logging in can be a challenge.

t's not just about translating words. What's missing are multilingual, plain-language explanations of key concepts — like what GDPR is, or how to recognize online scams. Without this, immigrant women are left feeling unsure, and unmotivated to engage with digital tools.

2 Devices, Data, and the Digital Divide

Next comes the issue of access. Even if a learner is motivated and understands the importance of digital skills, many simply don't have the tools. Across all partner countries, reports show that a large number of immigrant women rely solely on smartphones. And while a phone might be fine for WhatsApp or watching videos, it's far from ideal for writing a CV, navigating an online classroom, or attending a virtual workshop.

This lack of access hits hardest among low-income women, who often can't afford laptops or high-speed internet. Some NGOs and community centres offer shared resources, but the demand is high — and the support is often short-term or project-based. For many, the digital classroom is still out of reach.

3 Low Skills, High Risk

Even when the internet is available, digital literacy is not guaranteed. Many immigrant women lack basic computer skills and are unaware of the risks of being online — such as phishing, identity theft, or misinformation. This makes them especially vulnerable to cyber threats and often leads to fear or avoidance. The problem is made worse by the fact that very few training programmes are designed with their specific needs in mind. Mainstream digital literacy courses often assume a certain level of prior knowledge, confidence, or cultural familiarity. But for a woman who may never have used a computer before — and who might already feel out of place in a new country — these assumptions create more barriers than bridges.

4 Culture, Gender, and Everyday Realities

Add to that the social and cultural factors that shape everyday life. In many cases, immigrant women are the primary caregivers in their families. Finding time for courses — especially in-person ones — can feel impossible when they're also managing childcare, household duties, and sometimes a job.

In some communities, gender norms discourage women from using technology or participating in mixed-gender learning spaces. In others, women may be hesitant to trust digital systems or share personal information online. These cultural dynamics are often invisible to institutions, yet they play a powerful role in shaping who feels welcome — and who feels left out.

5 Lack of Inclusive and Adapted Educational programmes

While many adult education programmes exist across Europe, few are truly inclusive or responsive to the needs of immigrant women. Too often, digital training is delivered in a one-size-fits-all format. Few programmes take a gender-sensitive or culturally responsive approach. Topics like digital safety and GDPR may be included — but not in ways that are clear, accessible, or relevant to women's real lives.

Even educators themselves often lack training on how to support these learners effectively. Many are unsure how to integrate digital safety topics into language or vocational courses, or how to adapt content for learners with different cultural backgrounds and digital starting points.

6 Psychological Barriers and Fear of Technology

Finally, we can't ignore the emotional side of learning. Many women are hesitant to engage with digital tools due to past negative experiences, fear of making mistakes, or a general lack of confidence. Fear of surveillance, of being judged, or even of having their data misused can create a powerful resistance to digital learning.

Reports from Germany and Austria show that some women avoid digital spaces entirely due to mistrust of technology or authorities. Unless this fear is addressed with patience and empathy, even the best resources may go unused.

2.3 Insights on Vulnerable Learners (e.g., Immigrant Women)

The interviews and focus groups conducted across Austria, Germany, Czech Republic, Cyprus, and Poland provide valuable insights into the experiences and perspectives of immigrant women as vulnerable learners in adult education. One of the strongest messages emerging from the reports is that immigrant women are eager to learn and participate but require learning environments that acknowledge their specific needs and fears.

Several women emphasized that fear and insecurity are major emotional barriers to learning, especially in digital contexts. One educator from the Czech Republic highlighted this by saying:

"Some people worry that they will make mistakes or that they will not be able to understand the technology. I believe that building confidence is just as important as teaching technical skills. We need to create a safe, supportive environment where people feel comfortable asking questions and learning step by step."

This underscores the importance of trust and safe spaces in adult education programmes.
Moreover, many immigrant women lack understanding of how digital tools can improve their lives beyond mere communication. As another Czech interviewee put it:

"They may use WhatsApp or Facebook, but they don't realize they can use digital platforms for learning, business, or financial independence."

This reflects a need for more practical, real-life examples in digital literacy education that demonstrate the tangible benefits of these skills for personal and family empowerment.

From the learners' side, the fear of mistakes and lack of support were highlighted as key reasons for not engaging fully with digital tools. In Germany, one participant shared:

"I only have my phone. I can't write my CV properly on this. It's too small, and I don't know how to use the computer."

This statement reflects both technological limitations and feelings of inadequacy, showing how important practical device access and training are for these women.

Educators also recognise these vulnerabilities. As noted in the Austrian report, many teachers are aware that

"Immigrant women need much more tailored support, not only in learning how to use computers but also to feel safe and confident when going online."

The same report highlighted how **women-centred courses,** such as Concordia's "Digitalisierungskurs für Frauen", are particularly effective because they provide a gender-sensitive and supportive environment.

Furthermore, the intersection of digital learning with integration and family life is a central theme. One Polish participant shared that learning digital skills has enabled her to help her children at school and feel more integrated into society. In her words:

"Now that I can use the internet better, I can help my kids with school and also find out about things in Poland. It makes me feel part of here."

This reflects how digital inclusion directly relates to social inclusion and participation.

Interestingly, while immigrant women are aware of the risks of the digital space, they often feel helpless to protect themselves. As a participant in Cyprus described:

"I know that people can steal my information online, but I don't know what to do to stop it."

This quote highlights the urgent need for practical, accessible cybersecurity education, focusing not just on technical knowledge but also on building a sense of agency and control.

The reports also indicate that peer learning and community-based approaches are highly valued by immigrant women. As expressed in Austria:

"If another woman who also had to learn everything step by step teaches me, I feel I can do it too."

This points to peer mentoring and role models as powerful tools to overcome fear and encourage participation in digital learning.

Finally, educators and stakeholders emphasize that institutional flexibility and responsiveness are crucial. An educator from Austria stressed:

"Some women are very fast learners, others need more time. We need to adjust and give individual support."

This indicates a need for adaptive teaching methods that respect individual learning speeds and life situations, such as family care responsibilities.

03 National Summaries

3.1 Austria

Introduction

Austria has made substantial progress in digital transformation, with 64.7% of its population possessing basic digital skills, surpassing the EU average. However, marginalised groups, particularly immigrant women, face significant barriers to digital literacy due to language difficulties, financial constraints, and limited awareness of digital rights. The COVID-19 pandemic further highlighted the necessity of digital competencies, as digital engagement became essential for education and employment.

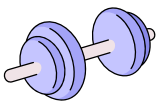
Digital Safety and GDPR Compliance

Digital safety and data privacy are major concerns in Austria, regulated under the General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (DSG). While Austria has taken steps to enhance digital security, challenges persist, particularly in cybersecurity threats and GDPR compliance. Reports indicate a rise in cybercrime, with over 65,000 cases recorded in 2023. Data breaches, lack of GDPR awareness, and difficulties in enforcing data protection laws further complicate the digital landscape.

Barriers to Inclusivity in Adult Education

Austria's adult education system provides diverse programmes, but immigrant women face distinct challenges, including discrimination, language barriers, and socio-economic constraints. Women with migration backgrounds are less likely to engage in digital education due to their lower employment rates and childcare responsibilities. Despite initiatives such as "Mama lernt Deutsch" and federal funding for women's integration programmes, gaps remain in making digital education fully accessible and inclusive.

Training Needs and Gaps



Interviews with adult learners, educators, and stakeholders reveal significant gaps in digital training. Immigrant women often lack confidence in using digital tools, fearing online scams and financial losses. Educators stress the need for hands-on, multilingual, and practical cybersecurity training. Stakeholders highlight the discontinuation of digital access programmes, such as laptop loans, as a barrier to digital inclusion. The lack of structured GDPR training for educators and learners further exacerbates digital vulnerability.

Case Studies of Best Practices

Successful initiatives include:

1. dig_mit! Project – Supports migrant women with digital and workplace literacy training, addressing language and employment barriers.
2. Digital Überall – A nationwide initiative offering free workshops on digital literacy, cybersecurity, and AI awareness for marginalised groups.
3. A1 Seniorenakademie – Focuses on digital education for seniors, improving their digital confidence and safety awareness.

3.2 Germany

Introduction

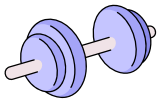
The digital safety and inclusion of immigrant women in Germany remain key challenges as digitalization advances. Migrant women face multiple barriers, including language difficulties, limited digital literacy, and restricted access to technology, making them vulnerable to online risks such as fraud, misinformation, and cyber harassment. The digital divide also impacts their ability to access education, employment, and government services. This report examines the legal frameworks, existing initiatives, and recommendations to improve digital inclusion for immigrant women.

Digital Safety and GDPR Compliance

Germany adheres to the General Data Protection Regulation (GDPR), yet compliance and enforcement remain inconsistent, especially for marginalised groups. Migrant women struggle to navigate GDPR due to complex legal language and insufficient multilingual resources. Additionally, data protection authorities face resource constraints, limiting their capacity to offer support. Algorithmic decision-making in job placements and credit approvals can further reinforce discrimination against migrant women, highlighting the need for stricter oversight.

Barriers to Inclusivity in Adult Education

Adult education remains a crucial avenue for digital inclusion, but migrant women face numerous challenges. These include language barriers that limit proficiency in German, making it difficult to engage in digital learning and understand privacy regulations. Many migrant women struggle to balance family obligations with education and employment due to childcare responsibilities. While smartphones are widely used, limited access to personal computers or stable internet restricts digital learning opportunities. Additionally, digital safety and literacy programmes do not always cater to the specific needs of migrant women, reducing their effectiveness.



Training Needs and Gaps

Field research identified key areas where digital education must be improved for migrant women. Educators reported that many learners fear online fraud and lack basic cybersecurity knowledge. GDPR compliance is widely misunderstood, and digital safety remains underemphasized in adult education. The need for hands-on, interactive, and multilingual training was repeatedly highlighted, as well as the importance of peer mentoring programmes.

Case Studies of Best Practices

Several initiatives have successfully improved digital inclusion:

1. ReDI School of Digital Integration: Provides free digital education for migrants and refugees, equipping them with skills to enter the labour market.
2. Stark im Beruf: Supports migrant mothers in integrating into the workforce through career counseling and vocational training.
3. MY TURN – MY POWER: Offers individualized support for migrant women, helping them navigate employment pathways with tailored guidance and skills training.

3.3 Poland

Introduction

Poland has made important steps towards digital transformation, complying with EU digital and data protection regulations such as GDPR. However, immigrant women in Poland—especially those from Ukraine—face substantial barriers in accessing digital education and ensuring online safety. Language difficulties, limited digital literacy, cultural differences, and economic hardship hinder their digital inclusion. Although government and NGO initiatives have emerged, many migrant women remain unaware or unable to access these services, creating ongoing challenges for their integration into Polish society.

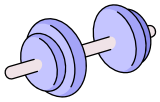
Digital Safety and GDPR Compliance

Poland has implemented GDPR alongside national data protection laws like the Data Protection Act of 2018. Despite these frameworks, many migrant women lack awareness of their digital rights, leaving them vulnerable to data misuse, online scams, and identity theft. Institutions such as the Personal Data Protection Office (UODO) oversee data privacy, but gaps remain in accessible education about data protection for migrants. Cybersecurity challenges also persist, with limited resources and training provided to vulnerable groups, and frequent use of public Wi-Fi by low-income migrants increases exposure to cyber threats.

Barriers to Inclusivity in Adult Education

Although Poland offers integration services and language courses, immigrant women face significant barriers to digital education. These include language issues that hinder access to information, socio-economic hardships limiting access to digital devices and stable internet, cultural and psychological stress, particularly for Ukrainian women, legal obstacles such as problems with identity documents, and age exclusion, as older women often lack basic digital literacy. These barriers contribute to low participation in digital training, despite available support programmes.

Training Needs and Gaps



Field research, including interviews and surveys with migrant women, educators, and NGOs, highlights significant gaps in digital safety training. Existing programmes often lack depth and focus on cybersecurity and GDPR rights and are rarely tailored to the specific needs of migrant women, including language and cultural barriers. Training opportunities are inconsistently available, and there is a lack of ongoing support and mentorship for both learners and educators. Moreover, financial constraints limit access to training for both NGOs and migrant women, who often cannot afford paid courses.

Case Studies of Best Practices

Several initiatives have successfully improved digital inclusion:

1. My Digital Life (FRSI): Full-time digital skills and job-readiness training for Ukrainian women, including LinkedIn, AI tools, and language courses.
2. DigiWelcome (Ocalenie Foundation): Basic digital literacy courses for migrant women with multilingual support and childcare.
3. #WELCOME vol. 3 (Mamo Pracuj Foundation): Employment and entrepreneurship support for Polish and refugee women through mentoring, language training, and peer networking.

3.4 Czechia

Introduction

Digital literacy and online safety are critical for the integration of immigrant women in the Czech Republic. While the country has strong legal frameworks, such as GDPR and cybersecurity laws, many migrant women face challenges in accessing digital education. Barriers include language limitations, lack of tailored training programmes, and limited access to technology, making them vulnerable to online risks like scams and misinformation.

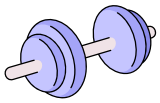
Digital Safety and GDPR Compliance

The Czech Republic follows the EU's GDPR and national cybersecurity regulations. However, awareness of data protection rights remains low, particularly among migrant women. Cyber threats, including phishing and online fraud, continue to rise. Language barriers and limited access to simplified digital safety materials hinder effective compliance and safe online behaviour.

Barriers to Inclusivity in Adult Education

Immigrant women struggle with:

- Language Barriers: Limited proficiency in Czech makes digital learning difficult.
- Access to Technology: Many rely solely on smartphones, lacking computers or stable internet.
- Training Gaps: Current programmes do not fully address digital safety or cybersecurity concerns.
- Childcare and Time Constraints: Balancing family duties with education is a major challenge.



Training Needs and Gaps

Field research highlights the importance of hands-on, community-led digital education. Many learners prefer interactive, problem-solving approaches, such as gamified learning and real-life case studies. There is a growing interest in digital entrepreneurship, but training on online business skills remains insufficient. Additionally, educators require better support and training to teach cybersecurity effectively.

Case Studies of Best Practices

Several initiatives have successfully improved digital inclusion:

1. Czechitas: Provides IT training for women, helping them enter tech careers.
2. Google User Group (GUG): Offers digital skills workshops and mentorship programmes.
3. One World in Schools: Uses documentary films to promote digital and media literacy.

3.5 Cyprus

Introduction

Cyprus, as a key migration hub in the Eastern Mediterranean, faces challenges in ensuring digital safety and inclusion for immigrant women. Many face barriers such as limited digital literacy, language obstacles, and cultural differences, which hinder their ability to access online services, employment, and education. A lack of awareness regarding GDPR and online safety further increases their vulnerability to cyber risks and data breaches.

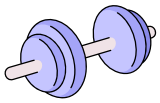
Digital Safety and GDPR Compliance

Although Cyprus follows EU regulations, including GDPR, gaps remain in enforcement and accessibility. Government awareness initiatives often fail to reach immigrant communities due to language and cultural barriers. Many migrant women lack knowledge of their digital rights, making them susceptible to fraud, cyber harassment, and data privacy violations. NGOs and local organisations play a key role in bridging this gap, but outreach remains limited.

Barriers to Inclusivity in Adult Education

Key obstacles include:

- Language Barriers: Limited access to Greek or English-language resources.
- Access to Technology: Low-income status restricts digital tool availability.
- Cultural Sensitivity: Mistrust in digital systems and privacy concerns hinder engagement.
- Limited Training Availability: Few programmes address immigrant women's digital literacy needs.



Training Needs and Gaps

Research highlights a demand for practical, community-driven digital literacy training. Many learners require multilingual resources, basic cybersecurity education, and awareness of GDPR rights. Additionally, there is a need for flexible learning models, including hands-on training, peer mentoring, and workplace-oriented digital skills programmes.

Case Studies of Best Practices

Several initiatives have successfully improved digital inclusion:

1. e-Learning for Change: Online language learning for migrants to improve digital access.
2. Embrace Your Rights: Support for refugee women survivors of gender-based violence through digital literacy.
3. Digital4ALL: Youth-focused digital inclusion initiative enhancing safety and critical thinking.

04

Building Digital Safety & Inclusivity

4.1 Understanding GDPR Compliance: Key Principles and Obligations

What is the General Data Protection Regulation (GDPR)?

The General Data Protection Regulation (GDPR) is a sweeping privacy law that took effect in May 2018 (European Council, 2024). Think of it as a rulebook for personal data. It sets the ground rules for how organisations must handle personal information belonging to people in the European Union (Ibid.). GDPR isn't limited to European companies – it applies to any company anywhere that deals with the personal data of individuals in the EU (Ibid.). So, a tech startup in Silicon Valley or a shop in Vienna both need to play by these rules if they have EU customers.

Why is it important?

GDPR exists because personal data is valuable – almost like a person's private treasure or diary. Misusing that data can harm people's privacy and trust. The GDPR's purpose is to make sure organisations treat your personal information with respect, transparency, and care (European Council, 2024).

For businesses, it's not just red tape, it's about earning and keeping customer trust. Following GDPR shows customers that you handle their data honestly and safely. On the flip side, ignoring GDPR can lead to hefty penalties. Regulators can slap fines as high as 4% of a company's global annual revenue or €20 million for serious violations (Noonan, 2020). In short, GDPR is important because it protects individuals' privacy rights and holds organisations accountable if they betray that trust. It's a big deal for anyone who values privacy or does business in today's data-driven world.

Who must follow GDPR?

GDPR casts a wide net. It doesn't matter if you're a small app developer in Brazil or a multinational corporation in New York – if you handle personal data of people living in the EU, GDPR likely applies to you (Taylor-Hiscock, 2021). This includes:

- Companies in the EU: All businesses based in EU member states must comply (Ibid.).
- Companies outside the EU serving EU residents: Even if a business is outside Europe, if it offers products or services to EU residents or even just monitors their behaviour online (think tracking website visitors or using cookies on Europeans), GDPR rules kick in (Ibid.).
- Organisations of all sizes: From one-person startups to giant enterprises – no one gets a free pass due to size. However, some obligations (like detailed record-keeping) are slightly relaxed for very small organisations with low-risk data usage (Ibid.).

In essence, GDPR's message is: if you use someone's personal data, you have to play by the privacy rules.

Key Principles & Obligations

GDPR isn't just a random collection of do's and don'ts, it's built on fundamental principles that set the tone for respectful and safe handling of personal data. You can think of these principles as the golden rules or the "house rules" for data (Wolford, 2018). Just like a friend's house might have rules ("take off your shoes at the door"), GDPR has rules any organisation must follow when "entering" someone's personal data. The regulation outlines seven core principles (GDPR-Info, n.d.):

1. **Lawfulness, Fairness, and Transparency:** Do everything with data in a legal, fair, and open way (Ibid).
2. **Purpose Limitation:** Collect data for a specific purpose and only use it for that purpose. No sneaky repurposing allowed (Ibid).
3. **Data Minimisation:** Collect only what you truly need. Don't hoard data "just because" (Ibid).
4. **Accuracy:** Keep personal data accurate and up to date (Ibid).
5. **Storage Limitation:** Don't keep personal data longer than necessary. Dispose of it safely when you no longer need it (Ibid).
6. **Integrity and Confidentiality:** Handle data securely. Protect it from leaks, breaches, or prying eyes (Ibid).
7. **Accountability:** Be able to show you're following all these principles. You're responsible for compliance and must be able to prove it (Ibid).

Let's break these principles down in a fun, relatable way – imagine personal data is like a treasured item someone lent to you.
How should you treat this precious item? GDPR's principles tell you how:

1 Lawfulness, Fairness & Transparency

"Ask permission and be honest."

Before you take someone's treasure (their data), you need to have a legitimate reason – basically, permission or another legal basis. For example, your friend says, "Yes, you can borrow my bike," so you're in the clear to use it. This is like getting consent or having a lawful reason to use data. Fairness means you don't trick your friend – you don't say you're borrowing the bike to go to the store but secretly enter it in a race. In data terms, you use the data in ways people would reasonably expect. Transparency means you tell it straight: if you're borrowing the bike (using their data), you let your friend know exactly why and how long you'll use it. In GDPR practice, this translates to clear privacy notices and not burying important details in fine print. People should never be in the dark about what's happening with their personal info (Data Protection Commission, n.d.).

2 Purpose Limitation

"Only use the treasure for the agreed quest."

If your friend lent you their bike to go to the grocery store, you shouldn't suddenly decide to use it to start a food delivery business. Under GDPR's purpose limitation principle, personal data collected for one specific purpose should not be used for a new, incompatible purpose without going back and getting fresh permission. In real terms: if an online bookstore collected your address to ship you a book, they can't just hand that address over to a partner charity because they think you might donate, unless you agree to it. Stick to the mission that was agreed upon when the data was collected. This keeps organisations from engaging in "function creep" – where data starts to wander into uses the person never expected (Data Protection Commission, n.d.).

3 Data Minimisation

"Take only what you need."

Imagine you're going on a picnic and you borrow a basket from a friend. You wouldn't also grab all their cookware and pantry items if you just needed a picnic basket and a blanket. GDPR echoes this common-sense idea: collect and use the minimum amount of personal data necessary for your purpose. If an online form asks for 10 pieces of personal information when only 3 are needed to provide the service, that's not minimising data. For instance, a simple newsletter signup likely just needs an email address. Less data held means less data that can go astray (Data Protection Commission, n.d.).

4 Accuracy

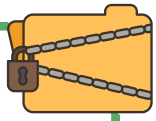
"Keep it correct or make it right."

Say your friend lends you a map to their secret fishing spots. If you notice a route is marked incorrectly, you'd correct it before using it, so you don't get lost or lead others astray. GDPR requires that personal data is kept accurate and up to date. Mistakes in data can be harmful – think of an error in your medical record or a misspelled name on an airline ticket. Organisations should have processes to update and fix data. If a customer changes their last name or a typo is found in their address, it should be corrected promptly (Data Protection Commission, n.d.).

5 Storage Limitation

"Don't keep it longer than you should."

Imagine you rented a storage locker for a month. After that time, you're expected to remove your stuff and free up the space. In the world of GDPR, organisations shouldn't hold on to personal data forever. There should be time limits or periodic reviews to decide if the data is still needed. For example, a company might say: "We'll keep your account data for 1 year after you leave our service, then we'll delete it." Keeping data longer than necessary not only invades privacy but also increases risk – old data might become a target for breaches. So, GDPR's message is clear: plan to securely delete or anonymise personal data once it's no longer required for the purpose you collected it (Data Protection Commission, n.d.)



6 Integrity and Confidentiality

"Guard it like a treasure."

If a friend entrusts you with their treasure, you wouldn't leave it on a park bench. You'd keep it safe, maybe in a locked drawer, and ensure it doesn't get damaged or stolen. This is exactly the ethos behind integrity and confidentiality. Organisations must protect personal data from unauthorised access or leaks. This means using technical measures like encryption, strong passwords, and security software, as well as organisational measures like limiting which staff can access the data. Integrity means maintaining the data's consistency and trustworthiness – not letting it be tampered with or altered by accident. Confidentiality means only those who are authorised should be able to see or use the data. GDPR expects businesses to be proactive about security – patch the leaks, train employees, and prepare for possible cyber-attacks (Data Protection Commission, n.d.).

7 Accountability

"Stand by your actions and be ready to prove it."

This principle is like the underlying rule that ties all the others together: it's not enough to follow the above principles – you should be able to demonstrate your compliance. Imagine you promise your parents that you'll follow all the house rules while they're away – they might expect a report or at least not come back to a mess as proof you did what you said. Similarly, under GDPR, an organisation must be ready to show regulators (and the public, if asked) how they are complying. This can include documenting the decisions you made about data, training staff in privacy practices, and keeping records of things like consent (Data Protection Commission, n.d.).

4.2 Strategies for Engaging Vulnerable Learners

Digital education holds the power to open doors — to **knowledge, employment, community, and independence.** But for many vulnerable adults digital spaces feel more like locked rooms than open paths. Lack of access, confidence, or language support means that many are left watching the digital revolution from the sidelines.

So how do we bring them in? How do we design digital learning environments that are not only accessible but welcoming, empowering, and culturally aware?

Strategies to Support a Positive Learning Mindset

Encourage a Growth-Oriented Approach

A **growth mindset** means believing that we can improve our abilities through effort, learning, and persistence — rather than thinking our skills are **fixed and unchangeable**. For adult learners, especially those facing systemic barriers or past educational challenges, this mindset can be transformative (Barbara Bush Foundation & Digital Promise, 2022).

Practical Ways to Foster a Growth Mindset in Adult Learners

- **Be honest about your own learning:** Share a personal challenge with technology to show that learning takes time for everyone (Ibid.).
- **Focus on progress, not perfection:** Frame assessments as opportunities to show growth, not just measure performance (Ibid.).
- **Address emotions**: Let learners write down any worries before a quiz to help reduce anxiety and gain perspective (Ibid.).
- **Normalise mistakes:** Use tools like the video "Three Ways to Celebrate Mistakes in Class" to highlight that errors are part of learning (Ibid.).

Create Authentic Learning Opportunities and Audiences

Adult learners are more engaged when learning feels personal and meaningful. When tasks connect to their lived experiences or goals, learning becomes a tool — not a task (Ibid.).

Implementation Strategies

- Ask learners to share their **real-world learning goals and digital needs.**
- Integrate tasks relevant to their **everyday lives and work environments.**
- Use **reflective questions** to guide learning design:

  Why are you here to learn? What tech tools do you already use? What challenges do you face using technology?

Support Reflection and Self-Direction in Learning

Set and Monitor Personal Learning Goals

Breaking big goals into smaller steps makes learning more manageable and less overwhelming. Setting clear, personal goals helps adult learners stay focused, celebrate progress, and reduce frustration (Ibid.).

Why it matters?

Goal setting boosts motivation, supports long-term memory (especially for older adults), and helps learners connect emotionally to their progress.

Three simple ways to support goal setting:

1. **Use sub-goals:** Break large goals into smaller, achievable tasks to build confidence and momentum.
2. **Let learners take the lead:** Encourage them to set personal goals by asking questions like: *What do I want to achieve? Why is this important to me?*
3. **Try digital tools**: Teach learners how to use reminders, checklists, or progress trackers on their devices to stay on track and reflect on their learning.

SMART - Goals

SMART goals help learners set clear, achievable objectives that promote both personal progress and inclusion. Each letter stands for a key quality:

Specific – Clearly state what you want to do

Measurable – Make sure you can track your progress

Achievable – Keep it realistic based on your current skills

Relevant – Connect the goal to something meaningful in your life

Time-bound – Set a deadline to stay on track

Example:

"I will create and send one email by next Friday, using my Gmail account."

This kind of goal helps learners take small but meaningful steps toward building digital confidence — one success at a time.

Encourage Purposeful Reflection During Learning

Reflection isn't just something that happens at the end of a course — it should be part of the learning process from the beginning. **Purposeful reflection** helps learners think critically about what they've learned and how it connects to real-life situations (Ibid.).

Instead of asking *"How well do I know this?",* encourage learners to ask *"How can I improve?"*. This mindset supports deeper learning and self-growth.

Ways to support reflection

- Use **regular check-in** questions (spoken or written) during lessons.
- Remind learners that **reflection is ongoing,** not just a final step.
- Discuss how **digital skills** apply to real goals:
  How will you use this skill? Why does it matter? Who could it help?

Strategies to Promote Essential Digital Literacy Skills

Build Foundational Computer Competencies

Many vulnerable adults need clear, **step-by-step instruction in basic digital functions** — like opening files, browsing safely, or sending emails (Ibid.).

Instruction Tips

- Use simple language and visuals.
- Break tasks into small steps.
- Use mobile-friendly resources and tutorials (e.g., GCFGlobal, Northstar).

Ideas for Delivery

- Keep content focused on one topic at a time — like how to send an email or upload a file. Use voice-over or simple captions to explain each action clearly (Ibid.).
- Give learners tasks that relate directly to their everyday goals. Practicing with meaningful activities builds both confidence and motivation to continue learning (Ibid.).

Develop Effective Internet Search Skills

Searching online gives learners access to endless information — but **knowing how to search well** isn't automatic. Many adults need support to make the most of this powerful skill (Ibid.).

Two helpful strategies

1. **Start with what they know:** Encourage learners to ask questions based on their interests or daily needs. For example, "How can I book a doctor's appointment online?"
2. **Teach smart searching:** Show how different word choices affect results. Try practical examples like: *"banks near me with ATMs" or "ATMs in [postcode]."*

Field Example: Use the SEARCH Method

Help learners build media literacy with this simple acronym:

S **elect** strong keywords

E **valuate** the content

A **dd** quotation marks for exact phrases

R **efine** the results

C **heck** the URL's credibility

H **unt** for the most useful and trustworthy info

Promote Active Learning

Encourage experiential learning

Experiential learning — or learning by doing — helps adult learners **build confidence** by engaging directly with tasks instead of only reading or discussing them. This method boosts motivation and shows learners they can take on new challenges. It includes four stages (Ibid.):

1. **Doing** (concrete experience)
2. **Reflecting** (observation)
3. **Understanding** (new ideas)
4. **Testing** (trying again)

It prepares learners for real-world problem-solving by putting them in situations where they must think, act, and adapt (Ibid.).

How to Use Experiential Learning in Digital Skills Training

- Assign **practical tasks** (e.g., post an announcement on social media).
- Add **small challenges** (e.g., upload a photo format that needs converting).
- Ask **reflection questions** like: *What was valuable about this activity? What did you learn about yourself? What digital skill would you like to improve next?*

Examples include:

Case studies, internships, service learning, simulations, job shadowing, and problem-based projects.

05

Practical Tools & Templates

5.1 GDPR Compliance Checklists

	Question/Requirement	Yes	No	Explanation
Personal Data & Consent	Have you reviewed your consent mechanisms to ensure they are freely given, specific, informed, and affirmative?			Consent must be explicit and clear. (Art. 7, 8, 9)
	Have you re-sought consent where current data does not meet GDPR standards?			Existing consents must be GDPR-compliant.
	Can you demonstrate that consent was obtained?			Records of consent should be maintained.
Legitimate Interest & Legal Basis	If you process data based on legitimate interest, has a proper assessment been done?			Balance test needed to justify use.
	Do you document a lawful basis for all data processing?			Legal justification must be clear. (Art. 6)
Data Subject Rights	Do you have a policy for handling Subject Access Requests (SARs)?			Right to access data (Art. 15).
	Can you respond to SARs within one month?			Timely responses required.
	Can individuals obtain their data in a structured, machine-readable format?			Right to data portability (Art. 20).
Accuracy & Retention	Is data only used for its original purpose?			Purpose limitation (Art. 5).
	Is only necessary data collected (data minimisation)?			Collect only what's needed.
	Is personal data kept accurate and up to date?			Accuracy principle (Art. 5).

	Question/Requirement	Yes	No	Explanation
Trans-parency	Are individuals fully informed of how their data is used?			Transparent data use (Art. 12, 13, 14).
	Do individuals get clear info when data is collected directly?			Notice required under Art. 13.
Data Controller Obligations	Are data processing agreements in place with all suppliers/third parties?			Contracts must address GDPR duties (Art. 27-29).
	Have you appointed a DPO if required?			Mandatory for certain organisations (Art. 37-39).
	If not, are reasons for not appointing a DPO documented?			Explain decision not to appoint.
Data Security	Have risks been assessed and measures applied?			Risk-based security (Art. 32).
	Is there a documented security program covering technical and organisational safeguards?			Structured security management.
	Is data erased or anonymised when no longer needed?			Data lifecycle management.
Data Breaches	Is there a documented data breach response plan?			Breach management (Art. 33, 34).
	Are response plans regularly reviewed?			Continuous improvement.
	Are data subjects informed of breaches when necessary?			If risk to individuals is high.
Inter-national Data Transfers	Is data transferred outside the EEA?			Identify all international transfers. (Art. 44-50)
	Does this include special categories of data?			Sensitive data must be noted.
	Is the purpose of the transfer clear?			Define why data is transferred.

GDPR Checklist (GDPR.eu, n.d.) (Data Protection Commission, n.d.-b)

5.2 Inclusivity Protocols and Guidelines

1 Introduction

1.1 Purpose and Scope

This Inclusivity Protocol and Guidelines document outlines the framework for ensuring equitable access, participation, and engagement in digital learning and adult education, particularly for vulnerable groups such as immigrant women, seniors, and individuals with disabilities. It provides a structured approach to fostering diversity, inclusivity, and safety in digital and hybrid learning environments.

1.2 Principles of Inclusivity

The BRIDGE Inclusivity Protocol is founded on the following principles:

B alance: Ensuring equal opportunities for all participants, regardless of background.

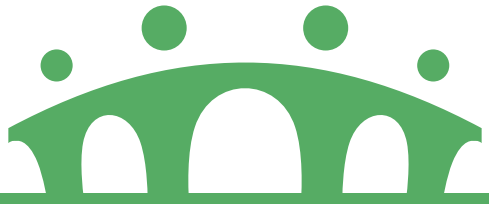
R espect: Acknowledging diverse perspectives and fostering a culturally aware learning environment.

I nnovation: Leveraging technology to create accessible, interactive, and engaging learning experiences.

D iversity: Encouraging representation of all societal groups in digital learning spaces.

G uradianship: Upholding ethical digital practices, data protection, and safeguarding vulnerable learners.

E mpowerment: Providing learners with the skills, resources, and confidence to navigate digital landscapes safely.



2 Accessibility and Equity Measures

2.1 Inclusive Learning Design

- Use multilingual resources and visual aids to cater to learners with limited language proficiency.
- Provide alternative formats such as transcripts, captions, and audio descriptions for digital content.
- Incorporate assistive technologies to support learners with disabilities (e.g., screen readers, speech-to-text software).
- Ensure that all digital platforms comply with Web Content Accessibility Guidelines (WCAG 2.1).

2.2 Digital Safety and Data Protection

- Comply with GDPR regulations by ensuring informed consent for data collection and processing.
- Provide training on cybersecurity and personal data protection for learners and educators.
- Implement two-factor authentication (2FA) and secure digital identities for user protection.
- Establish anonymous reporting mechanisms for online harassment or safety concerns.

3 Culturally Responsive Education

3.1 Representation and Inclusion

- Develop culturally relevant curricula that reflect diverse backgrounds and experiences.
- Recruit educators and facilitators from diverse linguistic and cultural backgrounds.
- Promote gender-inclusive language and materials to foster equitable learning environments.

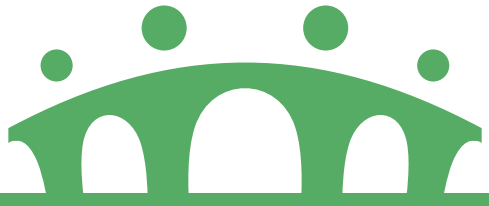
3.2 Community Engagement

- Partner with local organisations and NGOs to enhance outreach and support services.
- Organise peer mentoring programmes where experienced learners support newcomers.
- Conduct regular feedback sessions to assess learner needs and improve inclusivity measures.

4 Training and Capacity Building

4.1 Educator Training for Inclusive Practices

- Train educators in inclusive teaching methodologies and unconscious bias awareness.
- Provide professional development on digital accessibility standards and assistive technology use.
- Encourage the use of universal design for learning (UDL) strategies to support diverse learning needs.



4.2 Learner Support and Digital Literacy

- Offer free digital literacy workshops tailored to the needs of vulnerable learners.
- Provide self-paced learning options for individuals with varying schedules and commitments.
- Establish a safe online learning environment, incorporating guidelines for respectful communication and ethical digital behaviour.

5 Monitoring and Evaluation

5.1 Key Performance Indicators (KPIs)

- Enrolment and completion rates for underrepresented groups.
- Accessibility compliance of digital learning platforms.
- Learner satisfaction surveys and qualitative feedback from marginalised groups.
- Cybersecurity and data protection adherence across digital systems.

5.2 Continuous Improvement Strategy

- Regularly review and update inclusivity protocols based on learner feedback and emerging challenges.
- Establish an Advisory Council on Inclusivity to oversee progress and make policy recommendations.
- Promote case studies and best practices to guide future digital inclusivity efforts.

06

Case Studies & Best Practices

6.1 National Case Studies from Partner Countries

Case Studies Austria

1 dig_mit! Project (by LEFÖ)

- **Target Group:** Seniors, migrants, women, people with disabilities.
- **Focus:** Basic digital literacy for all marginalised groups.
- **Special Feature:** Localised workshops to ensure regional accessibility.
- **Implementation:** Public libraries, community centres, NGOs.
- **Notable:** Modular learning units, including cybersecurity and GDPR.

2 Digital Überall (Nationwide Programme)

- **Target Group:** Migrant women.
- **Focus**: Digital skills, labour rights, empowerment.
- **Started:** 2023, ongoing.
- **Special Feature:** Multilingual platform, participatory content, workshops.
- **Challenge:** Addressing literacy and language barriers in online environments.
- **Approach:** Inclusive pedagogy and practical digital empowerment.

3 A1 Seniorenakademie

- **Target Group:** Seniors, including marginalised older adults.
- **Focus**: Closing the generational digital divide.
- **Special Feature:** Cooperation with corporate partners like A1 telecom.
- **Method:** In-person and online workshops, tailored to seniors' needs (e.g., using smartphones safely).
- **Challenge:** Combining digital learning with cognitive and social aspects of aging.

Case Studies Cyprus

1 e-Learning for Change (Generation for Change CY)

- **Target Group:** Migrants, refugees, asylum seekers.
- **Focus**: Free online Greek and English language courses.
- **Duration:** Ongoing from May 2021 to December 2030.
- **Structure:** 12-week cycles, 2x weekly, via Zoom and MS Teams.
- **Impact:** Over 1,000 learners trained so far.
- **Special Feature:** Created due to pandemic-related limitations, but continues because of its success in reaching geographically isolated learners.
- **Challenge**: Limited access to stable internet and devices among some participants.

2 Embrace Your Rights – Empowering Refugee Women Survivors of GBV

- **Target Group**: Refugee and migrant women survivors of gender-based violence (GBV).
- **Focus:** Culturally sensitive counselling and empowerment.
- **Duration**: 2017–2019, across six EU countries.
- **Special Feature:** Professional training for counsellors to better understand the socio-cultural background of refugee women.
- **Output:** 600 counselling journals collected as part of individual and group sessions.
- **Challenge**: Emotional trauma and systemic barriers faced by women.

3 Digital4ALL: Empowering Youth Through Digital Inclusion and Safety

- **Target Group: Youth**, including marginalised and migrant communities.
- **Focus**: Digital literacy, inclusion, and online safety.
- **Duration**: 2023–2025, under Erasmus+.
- **Outputs**: Online learning platform, multilingual modules, training toolkit.
- **Impact**: 5,000+ participants trained, 80% reported improved confidence.
- **Special Feature**: Strong emphasis on interactive and gamified methods.
- **Challenge**: Limited infrastructure in rural areas.

Case Studies Czech Republic

1 Czechitas – Women in IT

- **Target Group**: Women, including migrant women, entering the IT field.
- **Focus**: Digital skills, coding, cybersecurity, AI.
- **Impact**: Over 70,000 trained, many moving into IT careers.
- **Special Feature**: "Czechitas for Ukraine" offers IT training and scholarships for Ukrainian women refugees.
- **Challenge**: Addressing gender stereotypes in IT and tech fields.
- **Partners**: Supported by private sector and endowment funds.

2 Google User Group (GUG) and Digital Change (Digitální Směna)

- **Target Group**: General public, including women, educators, and marginalised groups.
- **Focus**: Digital literacy, safe technology use, and community building.
- **Special Feature**: Interactive events, workshops, and video tutorials that make digital skills accessible to various audiences.
- **Implementation**: Community-led meetups and thematic workshops, focusing on real-life digital challenges.
- **Notable**: Strong focus on empowering women in IT and spreading knowledge on digital safety through peer learning and collaboration.

3 One World in Schools – Empowering Youth through Documentary Films

- **Target Group**: Educators, students (primary and secondary), and young active citizens.
- **Focus**: Civic education, media literacy, human rights, and social inclusion through documentary films.
- **Notable**: Improves critical thinking and tolerance; many alumni become community or civic leaders.
- **Partners**: Implemented by People in Need with schools and international partner organisations.
- **Challenge**: Adapting content to diverse local contexts; addressed through expert collaboration and tailored materials.

Case Studies Germany

1 ReDI School of Digital Integration

- **Target Group:** Migrants, refugees, and marginalised individuals.
- **Focus**: Free high-quality digital education and IT skills.
- **Founded**: 2015 in Berlin, now with several German branches.
- **Special Feature**: Industry partnerships (Microsoft, Cisco, Bosch).
- **Impact**: Over 30,000 students from 128+ countries.
- **Challenge**: Bridging language and cultural differences in IT learning.

2 Stark im Beruf

- **Target Group**: Migrant mothers aiming to enter the labour market.
- **Focus**: Counselling, qualification, labour market integration.
- **Duration**: Since 2015, ongoing.
- **Reach**: 90 project sites across Germany.
- **Impact**: Supported over 20,000 women, with 65% becoming more job-focused post-programme.
- **Special Feature**: Combines career orientation, language, and digital learning, adjusted to mothers' needs.

3 MY TURN – MY POWER

- **Target Group:** Migrant women in Rostock region.
- **Focus**: Empowerment, individual support, and integration into education and work.
- **Special Feature**: Personalised empowerment processes, focused on women far from the labour market.
- **Note**: Specific focus on psychological stabilisation and self-confidence building.

Case Studies Poland

1 My Digital Life

- **Target Group:** General public, including marginalised women.
- **Focus:** Digital literacy, safety, GDPR awareness.
- **Special Feature:** Practical workshops on everyday digital issues, including data protection and online scams.
- **Challenge:** Scaling the initiative due to funding constraints.
- **Status:** Integrated into ongoing educational programmes.

2 DigiWelcome (Ocalenie Foundation)

- **Target Group:** Migrant women, including refugees.
- Focus: Basic digital and smartphone skills.
- **Duration:** June 2024 – July 2025.
- **Participants:** 96 women from 27 countries.
- **Languages:** Courses offered in 4 languages, childcare provided.
- **Challenge:** Limited time for in-depth training, low literacy levels among some participants.
- **Sustainability:** Planned future editions based on high demand and positive outcomes.

3 #WELCOME vol. 3 – Empowering Polish and Refugee Women

- **Target Group:** Polish and refugee women (mainly Ukrainian), aged 25–50+, including mothers and caregivers.
- **Focus:** Employment readiness, entrepreneurship, language learning, and cross-cultural integration.
- **Special Feature:** Combines mentoring, Gallup Strengths Tests, language courses, and webinars in a hybrid format.
- **Partners:** Local networks, volunteers, mentors, and expert trainers.
- **Challenge**: Addressing varied skill levels and language needs while offering childcare and inclusive access.

6.2 Success Stories in Digital Safety and Inclusivity, Lessons Learned and Recommendations

Across the partner countries, several successful initiatives and case studies have been identified that contribute significantly to promoting digital safety, literacy, and inclusivity. These efforts are particularly focused on supporting vulnerable groups, such as immigrant women, who often face additional challenges in accessing digital resources. The initiatives showcase effective models of community engagement, where local organisations and volunteers work together to reach out to these groups. They provide targeted training programmes that are tailored to the specific needs of the participants, offering practical skills to help them navigate the digital world confidently. By addressing language barriers and providing user-friendly materials, these programmes make it easier for immigrant women to participate. Additionally, the initiatives employ practical approaches to overcoming digital barriers, such as providing access to technology and internet services, which are crucial for enabling full participation in today's digital society. Through these comprehensive efforts, the initiatives not only enhance digital skills but also empower individuals to become more independent and integrated into their communities.

Austria: Dig_mit!, Digital Überall, and A1 Seniorenakademie

Dig_mit! Project (LEFÖ) stands out as a pioneering initiative that empowers migrant women by combining digital literacy with workplace rights education. The programme is innovative in its multilingual, mobile-first online platform, making the content accessible even to those with limited German skills and low literacy. A notable success is its participatory approach, where migrant women contribute to content creation based on their own needs and experiences. This initiative has won the "Innovation Award Adult Education" in 2023, recognising it as a pioneering initiative for empowering migrant women through digital and workplace literacy.

Digital Überall, part of Austria's Digital Competence Offensive (DKO), has become a national benchmark in addressing digital divides. Between March and June 2024, 730 workshops were conducted, reaching 6,800 participants from diverse backgrounds, including refugee and migrant women. Importantly, female participation rose from 59% to 71%, showing remarkable gender inclusivity. The programme is recognised for successfully bridging gaps in digital skills for seniors and marginalised populations, including awareness-raising on AI and online safety. It enjoys strong backing from multiple ministries, ensuring long-term sustainability.

A1 Seniorenakademie, Austria’s leading senior-focused digital education initiative, has trained over 42,000 older adults in 3,200 workshops, specifically addressing online safety, GDPR awareness, and scams. Awarded a national quality seal for senior education, the program stands out for adapting to seniors’ unique learning needs, emphasizing practical, safe usage of digital tools for communication, banking, and social inclusion.

Cyprus: e-Learning for Change, Embrace Your Rights, and Digital4ALL

e-Learning for Change, operated by Generation for Change CY, has successfully provided over 1,000 refugees and migrants with free online Greek and English language courses since 2021. This initiative is not only volunteer-driven but also aims for long-term impact, continuing until 2030. Through online learning, it empowers participants with essential language skills and digital literacy, thereby helping them integrate more effectively into their new environments.

Embrace Your Rights has made a significant contribution to supporting refugee women who are survivors of gender-based violence (GBV). The project offers culturally sensitive counseling sessions, which are thoughtfully combined with education on online safety and data protection. By collecting 600 personal journals, the initiative has had a profound psychological and social impact, helping these women rebuild their lives with greater confidence and awareness.

Digital4ALL has successfully trained over 5,000 young individuals, many from marginalised communities, in digital literacy and safety. The programme stands out due to its innovative application of gamification and interactive content, leading to 80% of participants reporting enhanced digital confidence. Additionally, it has developed a comprehensive multi-module e-learning platform, ensuring the programme's sustainability and continued impact beyond the Erasmus+ funding cycle.

Czech Republic: Czechitas, Google User Group (GUG), and One World in Schools

Czechitas is an internationally recognised example of gender-inclusive IT education. With over 70,000 women trained, including migrants and refugees, Czechitas offers pathways into IT, cybersecurity, and data science. The programme provides career mentoring, scholarships, and ensures social or financial barriers don’t hinder participation. Backed by major tech partners (e.g., Google, IBM), Czechitas has won several awards for its impact on women’s digital empowerment.

Google User Group (GUG) and Digital Change (Digitální Směna) have successfully fostered grassroots digital literacy and online safety awareness through community-led meetups and workshops. Their focus on accessible formats like video tutorials and interactive events makes digital knowledge approachable for diverse audiences, especially women and educators.

One World in Schools (OWIS), developed by People in Need, uses documentary films to teach media literacy, civic engagement, and social awareness in over 4,000 Czech schools. It empowers youth through critical thinking, film clubs, and educational projects on migration, inclusion, and democracy. The programme has expanded to 14 countries, making it a widely transferable and sustainable educational model.

Poland: My Digital Life, DigiWelcome, and #WELCOME vol. 3

My Digital Life, developed by the Fundacja Rozwoju Społeczeństwa Informacyjnego, offers digital skills training for migrant women, focusing on practical tools like CV building, LinkedIn, AI use, and safe internet practices. Over 100 participants have benefited from full-time courses combining career mentoring, business development support, and language learning. Despite limited resources, the programme has been widely appreciated and successfully integrated into broader community projects.

DigiWelcome, run by the Ocalenie Foundation, provides essential digital and smartphone literacy for migrant women. Taught in multiple languages and supported with childcare services, the project lowers key barriers to participation. The pilot, funded by the Cisco Foundation, reached 96 participants from 27 countries and is set to expand in 2025 with a strong focus on inclusion and everyday digital resilience.

#WELCOME vol. 3, coordinated by the Mamo Pracuj Foundation, empowers Polish and refugee women—especially mothers—through mentoring, language training, and entrepreneurship support. With over 240 participants across several cities, the programme builds self-confidence, fosters peer networks, and supports access to employment and business opportunities. Strong demand, high engagement rates, and inclusive practices make it a standout model for gender-responsive digital inclusion.

Germany: ReDI School, Stark im Beruf, and MY TURN – MY POWER

ReDI School of Digital Integration has emerged as a premier model in Europe for integrating marginalised groups, particularly migrants, into the digital economy. With more than 30,000 students hailing from 128 different countries, the school offers comprehensive IT training, mentoring, and job readiness programmes. It collaborates with major tech giants such as Microsoft, Bosch, and Cisco, showcasing its commitment to excellence in creating employment pathways. Many of its graduates successfully secure positions in the tech industry, proving that targeted digital education can significantly transform lives and foster economic integration.

Stark im Beruf stands as a nationwide success story for migrant mothers aiming to integrate into the labor market. Since its inception in 2015, the programme has supported over 20,000 women, offering extensive training in digital skills, language proficiency, and career development. Notably, 65% of participants report having a clearer focus on employment and further training after completing the programme. This highlights its effectiveness in bridging the gap between family responsibilities and employability.

MY TURN – MY POWER focuses on empowering migrant women through personalized educational pathways. By combining psychological support, digital literacy, and job orientation, the programme places a strong emphasis on individual plans and empowerment coaching. This approach ensures that even women facing multiple vulnerabilities can engage with and benefit from digital inclusion processes, ultimately enhancing their personal and professional lives.

Lessons Learned

From these success stories, several key lessons emerge that are crucial for improving digital safety and inclusivity for vulnerable learners:

Tailored and Community-Based Approaches Work

programmes like dig_mit! and Digital Überall show that locally adapted, culturally sensitive training reaches marginalised groups more effectively than standardised approaches.

Holistic Support is Essential

Initiatives like Stark im Beruf and MY TURN demonstrate that digital skills training must be integrated with broader support, such as career counseling, psychological support, and childcare.

Peer Learning and Mentoring Increase Success Rates

Czechitas and ReDI School highlight the value of peer support and mentoring, especially in overcoming confidence barriers in marginalised groups.

Gamified and Interactive Methods Enhance Engagement

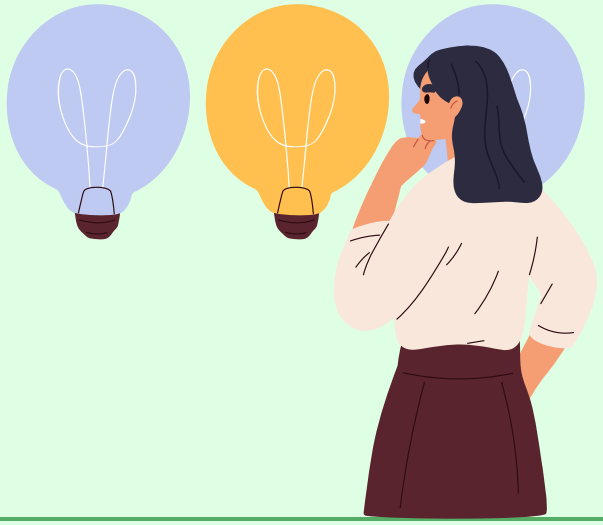
Digital4ALL and ReDI School show that engaging, interactive, and gamified learning formats significantly increase learner motivation and retention.

Multilingual and Accessible Resources Are Critical

Almost all projects (e.g., DigiWelcome, dig_mit!) underline the need for training materials in multiple languages and simple, visual formats to include low-literacy learners.

Partnerships Enhance Reach and Impact

Collaborations with municipalities, NGOs, and private companies (e.g., A1, Bosch, Cisco) help scale up initiatives and ensure access to resources and expertise.



07

Organisational Change Framework

7 Organisational Change Framework

What is Organisational Change Management?

An Organisational Change Framework (OCF) is a structured methodology designed to help businesses navigate and implement change effectively (Smith, 2024). It serves as a strategic plan that guides organisations through transitions, ensuring that employees, stakeholders, and project teams are well-prepared for upcoming adjustments (Ibid.).

In any business setting, change is essential. It reflects a commitment to continuous growth and adaptation, ensuring that an organisation remains modern, relevant, and competitive in an evolving market (Ibid.). The nature of business change varies depending on its cause and can generally be categorised as either **planned or reactive** (NI Business Info, n.d.).

Planned change is a deliberate and strategic process aimed at improving business operations or achieving specific objectives (Ibid.). Organisations implement this type of change to enhance efficiency, introduce new products or services, or undergo structural modifications (Ibid.). For instance, a company may restructure its departments to optimise workflow or launch innovative offerings to expand its market presence (Ibid.).

Reactive change, on the other hand, occurs in response to unforeseen circumstances beyond the organisation's control (Ibid.). This type of change is often necessary to address external challenges or sudden disruptions (Ibid.). Examples include a decline in consumer demand for a product or service, economic downturns, or crises such as the COVID-19 pandemic, which forced businesses worldwide to rapidly adapt their operations (Ibid.). Organisational change can generally be classified into four main categories (NI Business Info, n.d.):

- **Strategic Change**
- **Structural Change**
- **Technological or Process-Oriented Change**
- **People-Oriented Change**

Strategic organisational change focuses on redefining the overall goals and purpose of a business, including adjustments to its vision and mission, while process-oriented change involves the introduction of new technologies, skills, and operational processes to improve efficiency (Ibid.). In contrast, people-oriented change relates to employees and addresses aspects such as performance, skills, attitudes, behaviours and workplace relationships (Ibid.).

Having outlined the **different types of organisational change**, the most relevant for this project is **people-oriented change.** Since the BRIDGE Project focuses on vulnerable learners, such as immigrant women, human-centric change plays a crucial role.

Traditional vs. People-centred Change Management

The modern workplace is experiencing an unprecedented rate of change. For instance, employees encountered an average of 10 planned enterprise changes in 2022, up from just two in 2016. Despite this, only 15% of employees feel confident in their leaders' ability to manage these transitions effectively (Chau, 2025). Traditional change management methods, which are linear and process-oriented, often neglect employee engagement, leading to skepticism and anxiety (Ibid.). In contrast, a people-centred approach significantly enhances employee well-being and streamlines the change process (Ibid.). Employees in such organisations are 11 times more likely to report positive change experiences (Ibid.).

Key Strategies for People-centred Change

1. **Prioritise Employee Experience:** Cultivate a supportive culture where employees feel valued. Organisations with integrated recognition systems are 9 times more likely to have employees who believe changes are managed well.

2. **Empower Leaders at All Levels:** Equip leaders with the necessary tools to guide their teams through change. When leaders are prepared, the risk of employee burnout decreases by 73%.

3. **Foster Open Communication:** Maintain transparency by actively seeking employee feedback through surveys, focus groups, and open forums. This inclusivity builds trust and a sense of community.

Reflection

Consider the following questions to assess your organisation's approach to change management:

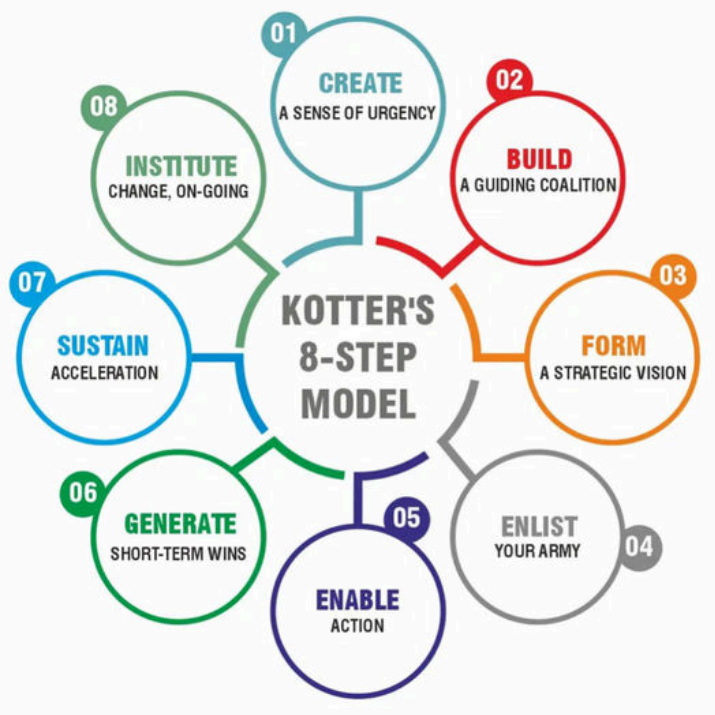
- How does your organisation currently support employees during transitions?
- Are leaders at all levels equipped to manage change effectively?
- What channels exist for employees to voice their concerns and suggestions during change initiatives?

Organisational Change Management Techniques

There are numerous Organisational Change Management (OCM) methodologies available, each following a structured sequence of steps (Smith, 2024). These approaches can be either linear or cyclical, depending on the framework. Some of the most widely recognised methods include (Ibid.):

Kotter's 8-Step Process for Leading Change

Create → Build → Form → Enlist → Enable → Generate → Sustain → Institute (Smith, 2024).

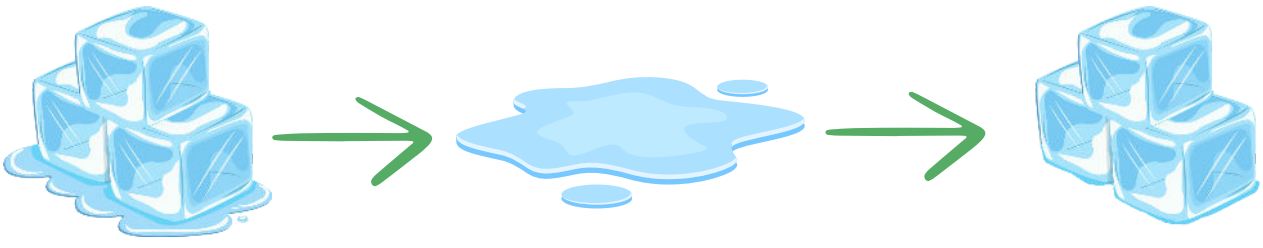


Kotter's 8-Step Model (McPheat, 2023)

Kotter's framework emphasises a structured, step-by-step process for change, beginning with the creation of urgency and the formation of a guiding team (WalkMe Team, 2024). The model then focuses on communicating a vision, empowering employees, and generating short-term successes to sustain momentum before fully integrating change into organisational culture (Ibid.).

Kurt Lewin's Change Model:

Unfreeze → Change → Refreeze



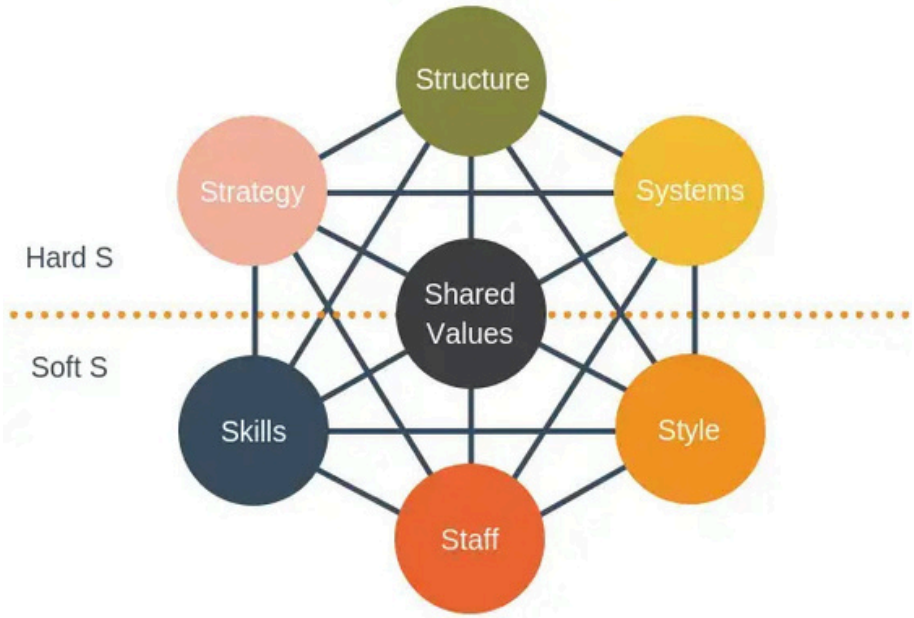
Unfreeze Change Refreeze

Kurt Lewin's Change Model. Own illustration based on (WalkMe Team, 2024)

Lewin's approach simplifies change into three phases: Unfreeze, which prepares an organisation by breaking old habits; Change, where new processes and behaviours are introduced; and Refreeze, ensuring that the new practices become standard and sustainable over time (WalkMe Team, 2024).

McKinsey's 7-S Framework:

Style, Skills, Systems, Structure, Staff, and Strategies, all aligned with Shared Values & Goals (Smith, 2024).



McKinsey's 7-S Framework (Minute Tools Content Team, 2018)

The model is widely used to support various organisational processes, including managing change, guiding mergers and acquisitions, implementing new strategies, and identifying weaknesses or blind spots within an organisation (Minute Tools Content Team, 2018). The diagram highlights several key aspects (Ibid.). Firstly, all areas are interconnected, meaning that any change in one element will impact the others (Ibid.). Additionally, the absence of hierarchy and the equal sizing of all areas suggest that each element holds equal importance (Ibid.). Furthermore, the framework distinguishes between hard and soft areas, where hard areas are more easily influenced by management, while soft areas are shaped by the organisation's culture (Ibid.). Lastly, the placement of Shared Values at the centre emphasizes their fundamental role in guiding and connecting all other elements within the organisation (Ibid.).

ADKAR Model

Awareness → Desire → Knowledge → Ability → Reinforcement

Awareness
Ensure awareness of issues

Desire
Incentivize with benefits and consequences

Knowledge
Know how to create and how to sustain change

Ability
Closing the skills gap that limits change

Reinforcement
Measuring and rewarding wins

7.1 Assessing Current Readiness for Digital Transformation

What Is Digital Transformation Readiness?

Before you dive headfirst into new technologies, pause for a moment and ask:

"Is my organisation truly ready for digital transformation?"

Digital transformation readiness refers to how prepared your business is to embrace digital innovation — not just in tech, but in mindset, leadership, operations, and people. It's about setting the stage before the curtain rises.

Think of it like renovating a house. You wouldn't start knocking down walls without checking the foundation, right? The same goes for transforming your business — **readiness is your foundation.**

The 5 Essential Building Blocks of Readiness

Are you truly ready for change?

This self-assessment helps you explore five essential areas of readiness. For each, use the table provided to **rate your organisation from 0 (not ready) to 5 (fully ready)** — and reflect honestly.

Dimension 1: Strategic Vision & Direction

To transform successfully, you need more than ambition — you need **a clear roadmap.** This dimension examines how well your digital goals align with your business vision.

Reflection Table

Statement	Rate (0–5)	Your Thoughts
We have a clear digital transformation strategy with defined goals.		
Leadership understands and supports our digital priorities.		
Digital plans are aligned with our long-term business vision.		
There's a shared understanding of digital goals across departments.		
We prioritise digital investment based on business outcomes.		

Dimension 2: People & Skills

Even the best digital tools are useless without **people who can use them confidently.** This area evaluates your workforce's readiness to embrace digital transformation.

Reflection Table

Statement	Rate (0–5)	Your Thoughts
Our team has the digital skills needed to adapt to new tools and platforms.		
Employees receive ongoing training in digital competencies.		
Leaders promote a culture of learning and experimentation.		
There is openness to change among teams and departments.		
We have clear plans to close digital skill gaps.		

Dimension 3: Technology & Infrastructure

This area assesses the **technical foundation** that supports innovation. Are your systems modern, secure, and flexible enough for transformation?

Reflection Table

Statement	Rate (0–5)	Your Thoughts
Our IT infrastructure supports scalability and flexibility.		
We can easily integrate new digital tools or platforms.		
Our systems are secure, up to date, and regularly maintained.		
We use cloud-based solutions or are planning to adopt them.		
We have a reliable data management and backup system.		

Dimension 4: Operations & Processes

Efficient, digitised operations are the engine of transformation. This dimension examines whether your **day-to-day processes are streamlined and future-ready.**

Reflection Table

Statement	Rate (0–5)	Your Thoughts
Our key business processes are already digitised or automated.		
We actively use data to drive decisions and optimise performance.		
Departments collaborate effectively using digital tools.		
We regularly review and improve operational workflows.		
Bottlenecks or inefficiencies are identified and addressed quickly.		

Dimension 5: Culture & Leadership

Culture determines how fast and how well change is embraced. This area looks at whether your **leaders champion transformation** and whether your **culture supports innovation.**

Reflection Table

Statement	Rate (0–5)	Your Thoughts
Leaders consistently promote digital transformation across the organisation.		
Our culture encourages innovation, risk-taking, and learning from failure.		
Employees feel safe and supported during change.		
We reward digital thinking and experimentation.		
Feedback from employees is used to improve transformation initiatives.		

Wrap-Up: What Do Your Scores Say About You?

Great job on completing your self-assessment! Now it's time to **make sense of your scores** — and turn insights into action.

Each of the five dimensions you rated (Strategy, People, Technology, Operations, and Culture) gives you a **snapshot of your organisation's readiness** for digital transformation. The scale you used (from 0 to 5) helps you understand not just where you stand — but where you can go next.

How to Calculate Your Score (Per Dimension)

Each table includes 5 reflection statements. Here's how to score:

- Add up your 5 ratings for the dimension
- Divide the total by 5 → This gives you your average score

Example:

You rated a dimension with these scores: 3 + 4 + 4 + 3 + 2 = 16

- 16 ÷ 5 = 3.2 (average score)

Use this number to interpret your readiness in each area.

Scoring and Meaning

Average Score	What It Means
3.00 or below	**Behind**: You may be struggling in this area. It's time to address key challenges.
3.50	**On Par:** You're keeping up with the average, but there's room to grow.
3.80	**Slightly Ahead:** You're already making good progress and showing potential.
4.25 and above	**Significantly Ahead:** You're a leader in this area. Keep the momentum going!

Next Step: Turn Insight into Action

Identify your **lowest-scoring** dimension

Create a **mini-action plan** with goals for improvement

Re-assess **every 6–12 months** to track progress

7.2 Steps for Implementing Organisational Change

Successful organisational change requires a structured and well-planned approach (Brown, 2024). Even when employees support a proposed change, an uncoordinated implementation can create obstacles and reduce effectiveness (Ibid.). Research indicates that approximately 70% of change initiatives fail due to employee resistance and insufficient support (Ibid.).

To overcome these challenges, organisations must follow a systematic process that ensures clear communication, stakeholder engagement, and proper adaptation to new practices. The table below outlines the essential steps for effectively implementing change:

Steps	Description	Checklist Questions
☐ **1.Identify the Need for Change**	Recognise existing challenges and identify root causes instead of superficial solutions. Ensure that changes address significant operational needs.	• What specific problem or inefficiency is being addressed? • What evidence supports the need for change?
☐ **2. Prepare the Organisation for Change**	Raise awareness about the need for change and prepare the organisation culturally and logistically. Engage employees to minimise resistance and ensure alignment.	• Are employees aware of the reasons for change? • What challenges might cause resistance? • How can leadership build acceptance?
☐ **3. Define Goals and Intended Impact**	Clearly define the objectives of the change initiative, specifying both quantitative and qualitative goals to ensure meaningful transformation.	• What are the specific goals of the change? • How will success be measured • What impact is expected at different organisational levels?
☐ **4. Get All Stakeholders Onboard**	Ensure that executives, managers, and employees are aligned with the change. Communicate its benefits and offer support to reduce resistance.	• Who are the key stakeholders? • How will they be engaged and informed? • What resistance is anticipated, and how will it be managed?

	Steps	Description	Checklist Questions
☐	**5. Develop a Collaborative Plan**	Work collaboratively with stakeholders to create a structured yet flexible change plan, including goals, resources, and timelines.	• What resources are required for successful implementation? • What risks exist, and how can they be mitigated? • Is the plan realistic and flexible?
☐	**6.Implement the Changes**	Follow the plan to implement changes while ensuring open communication and providing access to necessary resources. Anticipate and address roadblocks.	• Are all stakeholders aligned with the implementation strategy? • How will communication and support be maintained? • What contingency plans exist?
☐	**7.Manage Change, Track Performance, and Celebrate Progress**	Monitor progress, track key performance indicators, and recognise achievements to maintain motivation and momentum.	• How is progress being measured? • What quick wins can be celebrated? • How can resistance or setbacks be managed effectively?
☐	**8. Embed Changes Within Company Culture and Practices**	Integrate new processes and practices into the company's culture to prevent regression. Establish systems and structures that reinforce the change.	• How will new processes be integrated into daily operations? • What structures will reinforce the change? • How can reversion to old ways be prevented?
☐	**9.Review Progress and Analyze Results**	Conduct a thorough post-implementation review to assess effectiveness, identify lessons learned, and refine future change strategies.	• Were the goals met? • What lessons were learned? • How can this knowledge improve future change initiatives?

7.3 Tools for Monitoring and Evaluating Progress

Effective monitoring and evaluation (M&E) are crucial for the success of change management initiatives, as they ensure that organisational transitions are implemented smoothly and achieve desired outcomes. Utilising appropriate tools can help organisations track progress, measure impact, and make informed decisions throughout the change process.

One of the most common challenges in change management is the **difficulty of identifying suitable Key Performance Indicators (KPIs) -** a problem reported by 29% of professionals in recent research (Horlick, 2025). Without clear indicators, it becomes difficult to measure whether a change initiative is truly successful beyond just its technical implementation (Ibid.).

To overcome this obstacle, organisations can take several practical steps:

1 Define Success Early and Clearly

It is essential to **establish a shared understanding of success at the beginning of the project.** This applies to both traditional project models and agile approaches such as sprints or phased releases (Horlick, 2025). Setting expectations early helps guide planning, communication, and evaluation throughout the project lifecycle (Ibid.).

2 Broaden the Definition of Success

Success should not only be defined in terms of technical outcomes (e.g., systems installed, features delivered) (Horlick, 2025). It should also include the **"people side" of change**, such as:

- Adoption rates by employees
- Consistent use of new systems or processes
- User satisfaction and engagement

These human-focused metrics are just as important as technical ones in determining whether the change will stick and deliver long-term value (Horlick, 2025).

3 Integrate People-centred Metrics Early

When technical KPIs are being defined (e.g., timelines, budget, feature rollout), it's wise to **introduce change adoption metrics at the same time** (Horlick, 2025). This ensures the "people side" is considered from the start rather than as an afterthought (Ibid.).

4 Keep Metrics Simple and Measurable

Rather than tracking a long list of indicators, **choose a few core KPIs that are easy to monitor and meaningful** for your project (Horlick, 2025). Clear, trackable metrics support better decision-making and encourage project teams to focus on what matters most (Ibid.).

From Definition to Monitoring: Turning KPIs Into Action

Once the definition of success is agreed upon, the next step is to **collaborate with stakeholders**—such as sponsors, project leads, and team members—to **identify the right KPIs**. These indicators should reflect both the **effectiveness of change management strategies** and the **engagement** of those affected by the change.

After selecting KPIs, it is important to **set a regular schedule for monitoring progress.** This involves:

- Tracking KPI results at key milestones
- Analyzing what the data is showing
- Making informed adjustments to improve outcomes

This ongoing feedback loop helps keep the project on track and allows the team to adapt strategies when needed, increasing the likelihood of successful and sustainable change.

Foundational Methodologies for Measuring Change Progress

Change management measurement requires structured approaches to effectively track progress across multiple dimensions of an organisation (Horlick, 2025).

Three-Level Performance Measurement Framework

The Prosci methodology advocates measuring effectiveness at three interdependent levels:

Three-Level Performance Measurement Framework. Own illustration based on (Horlick, 2025).

Essential Metrics for Measuring Change Effectiveness

A recent Prosci study revealed that **88% of organisations** with strong change management practices **successfully achieved or surpassed their goals**, whereas only 13% of those with weak practices did the same (Anderson, 2024). This significant difference highlights the critical role that well-implemented change management plays in project success (Ibid.).

To ensure meaningful oversight, it is essential to monitor key indicators across multiple dimensions, offering a well-rounded view of how the change initiative is progressing.

Employee Readiness and Engagement Metrics

Employee-focused metrics capture how well people are adapting to and embracing change (Wren, 2020):

- **Employee readiness assessment results:** Track preparation for change
- **Engagement and buy-in measures:** Monitor enthusiasm and commitment
- **Training participation rates:** Measure attendance and effectiveness
- **Employee satisfaction surveys:** Gauge attitudes toward the change

Process Performance Metrics

Process-oriented metrics evaluate how well the change is being implemented (Towe, 2024):

- **Process compliance rating:** Percentage of compliant processes relative to total processes
- **Change acceptance rate:** Percentage of changes approved by the Change Advisory Board
- **Percent of backed-out changes:** Changes that required reverting to previous states
- **Schedule variance:** Deviation from estimated implementation time.

For IT-focused changes specifically, tracking metrics like "number of unauthorised changes" and "percent of changes completed on time" provides valuable insights into implementation quality.

Organisational Impact Metrics

Impact metrics assess the business value delivered by the change (Towe, 2024); (Wren, 2020):

- **Number of incidents caused by change:** Indicates quality of implementation
- **Achievement of project KPIs:** Measures against predefined targets
- **Benefit realization and ROI:** Quantifies financial returns
- **Service downtime reduction:** Measures operational improvements

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These metrics link change efforts directly to business outcomes, demonstrating the value of change management investments.

Technological Tools for CM

Comprehensive Change Management Platforms

Several platforms offer end-to-end monitoring capabilities:

- **Prosci's Proxima:** A cloud-based application that guides users through the Prosci Methodology, enabling comprehensive tracking of change initiatives (Prosci, 2025)
- **Kaiya AI:** Prosci's expert AI change management tool that provides real-time, contextual assistance throughout the change process (Prosci, 2025)
- **The Change Shop:** Offers assessment tools to measure organisational readiness and track progress using real-time analytics (Towe, 2024)

These platforms integrate change management methodologies directly into their functionality, providing structured approaches to measurement.

Digital Adoption and Engagement Tools

Tools focused on user adoption provide valuable data on how employees interact with new systems (Ankit, 2024):

- **Whatfix and WalkMe:** Digital adoption platforms that create personalized walkthroughs and provide analytics on user engagement
- **Spekit:** Integrates with existing systems to deliver training and knowledge sharing while tracking adoption rates
- **Remesh**: An AI-driven platform facilitating real-time feedback from large groups to gauge employee sentiment

These tools are particularly valuable for technology-related changes, offering insights into how effectively employees are using new systems.

Project Management and Analytics Solutions

Project management tools with change management capabilities include:

- **Jira, Trello, and Asana:** Help organisations plan, prioritise tasks, and monitor progress (Towe, 2024)
- **Airtable:** Combines spreadsheet and database functionalities with AI integration for managing change activities (Ankit, 2024)
- **Fireflies.ai:** AI-powered meeting assistant that records, transcribes, and summarises change-related discussions (Ankit, 2024)

Industry Standards and Best Practices

Established standards offer structured approaches to change management measurement:

- **ISO 9001:2015:** Specifies requirements in four key clauses related to change management, including Planning of Changes, Operational Planning and Control, Design and Development Changes, and Control of Changes8
- **ITIL change management metrics:** Provides standardised KPIs for IT change management, including unauthorised changes, backed-out changes, and change acceptance rates

08

Action Sheets for Enhancing Digital Safety

8.1 Action Sheet 1: Digital Safety, Privacy, and GDPR Awareness

Responsible Implementing Actors

- The implementation should be led by adult education institutions, educators, and policymakers while NGOs and community organisations support these efforts.
- Managers should ensure GDPR compliance, while educators integrate digital safety into curricula.
- Stakeholders like the EU and Governments (on national, regional and local level) should provide funding and oversight of the actions.

Beneficiary Target Group

Primarily immigrant women themselves, as they tend to have low digital literacy and little to no awareness of GDPR. Secondarily their families will be able to have a better understanding. Adult education institutions and educators will enhance their inclusivity and effectiveness, while public authorities will see greater outreach and GDPR compliance. Ultimately, society as a whole will benefit from reduced digital inequality, increased integration, and stronger understanding of cybersecurity.

Scene-setter

The digital divide in Europe remains a critical issue, particularly for vulnerable groups such as immigrant women. According to Eurostat (2024), only 55% of EU adults aged 16-74 possess basic digital skills, with disparities based on education level. More specifically:

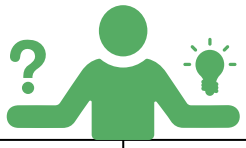
- 44% of Europeans don't have at least basic digital skills in all 5 digital competence areas
- 63% of Europeans aged 55-74 lack basic digital skills
- 30% of internet users in the EU lack basic digital safety skills
- 26% of Europeans check the truthfulness of content found online
- 15% of employed persons have received ICT education

Many vulnerable adults lack awareness of GDPR rights or how to protect personal data, leaving them susceptible to scams, identity theft, and misinformation. For example, interviews in the BRIDGE report reveal that immigrant women in Austria and Germany fear online fraud but lack the skills to prevent it. In Poland and Cyprus, reliance on public Wi-Fi among low-income migrants increases their exposure to cyber risks.

Adult education institutions often lack structured programmes to teach digital safety, and existing courses rarely accommodate multilingual or low-literacy learners. The COVID-19 pandemic highlighted these gaps, as marginalised groups struggled to transition to online learning. Without urgent intervention, digital exclusion will deepen, limiting access to employment, healthcare, and social services.

Challenge(s)

The lack of digital literacy among immigrant women leaves them vulnerable to online scams and identity theft. A large percentage of them are unaware of their digital and personal rights under the GDPR and struggle to understanding the terminology due to technical, accessibility and language barriers. Additionally, educators themselves seem to lack training in inclusive, GDPR-compliant practices.



Causes	Effects
Lack of digital literacy	Vulnerability to hacking methods (scams, phishing, identity theft) and misinformation
Being unaware of GDPR and digital rights	Individuals cannot protect their personal data and do not know that they can report breaches.
Limited access to training, devices and internet	Low participation in online training activities
Language and Cultural barriers	Difficulty in understanding digital rights and GDPR applied in the EU

Step-by-step Proposed Solution

1. **Workshops:** Multilingual interactive workshops on GDPR and Cyber Safety, introducing participants to basic terminology with the use of real-life examples will benefit the participants to easily understand these regulations. Collaboration with local NGOs on the content will further ensure cultural relevance.

2. **Accessibility:** Access to devices (laptops/tablets) and free Wi-Fi access points can support the learners. In addition, the learning resources should be smartphone-friendly and with low-data consumption. Community spaces (local governments/NGOs, libraries) can establish digital hubs providing access to devices and the internet.

3. **Training:** Educators must become familiar on how to integrate GDPR and digital safety in their courses taking into consideration the points set in Step 1. It is important for the educators to address the learner's fears by building their confidence and peer support.

4. **Guidelines:** The available resources should be presented in a simple and understandable way since the GDPR regulation is quite complicated and cybersecurity understanding includes a lot of terminology. Visuals with subtitles can further support the learners and support via online platforms or messengers can further boost their confidence.

5. **Multipliers:** Scaling up can be reached through peer to peer trainings, pairing with tech-savvy peers, promotion of existing initiatives in the countries and through funding opportunities. Feedback should be regularly received to adapt the programmes to the emerging needs.

Needed in/tangible Resources

Tangible Resources

- Infrastructure and Technology (devices, internet access, printed material)
- Financial (room and trainers costs, access to infrastructure and technology)
- Physical (training spaces, meeting rooms, transportation of trainees)

Intangible Resources

- Human Factor (trainers, facilitators, mentors, translators, IT staff, trainees, volunteers)
- Expertise (cybersecurity and policy specialists, curriculum experts)
- Networks (government departments, tech companies, law firms, NGOs and Community groups)
- Trust and understanding between trainers and trainees

Desired Outcomes

Short Term (within 4 months)

- Launch of the workshops to existing communities
- Collaboration with NGOs and other organisations working with immigrant women and existing initiatives.
- Educators training and adaptation of their training material
- Registration of interested immigrants.

Medium Term (within 10 months)

- Establishment of the workshops
- Institutional adaptation of the training content
- Improved access to devices and internet
- National roundtables to evaluate the content of the workshops
- Learner Feedback

Long Term (after 10 months)

- Systematic integration in the training programmes
- Establishment of peer-to-peer networks
- Multiplication of the workshops to other cities/countries
- Survey on the impact of the training with regards to cyber risks and GDPR understanding

Success Indicators

Digital Skills gained

Learner confidence

Reduction of the digital exclusion gap

Participation rates

8.2 Action Sheet 2: Language Barriers in Digital Spaces

Responsible Implementing Actors

Adult Education Institutions (AEIs) in collaboration with local NGOs, community centres, and public authorities should take the lead in implementing this action. These stakeholders are best positioned to understand the linguistic and cultural needs of immigrant women and can develop tailored digital education programmes with accessible, multilingual materials.

Beneficiary Target Group

The primary beneficiaries of the action are **migrant and refugee women**, who often face language-related challenges when navigating digital environments in a new country. This action will help them access essential services, participate in education and training, and engage more confidently in social and professional life. In addition, educators, local service providers, and communities will benefit from clearer communication, inclusive educational settings, and strengthened social cohesion.

Scene-setter

Across case study countries in Poland, the Czech Republic, Austria, Cyprus and Germany, language remains the primary barrier preventing migrant women from effectively navigating digital environments. Critical online services, platforms, public state or municipal domains, and educational resources **remain predominantly available only in national languages**, creating significant obstacles for newcomers with limited linguistic proficiency.

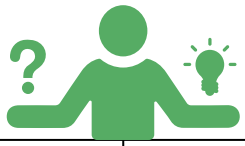
While a 2024 Eurobarometer survey indicates half of Europeans speak English as a second language, this is only sufficient for tourists. Long-term settlement demands a comprehensive understanding of the local language. According to the research "Migrants' and refugees' digital literacies in life and language learning" from 2025, Artamonova and Androutsopoulos emphasize that "*a prerequisite to successful social integration is not just learning the [additional] language, but also being digitally literate and thereby able to manage everyday tasks with digital tools*" (p. 83). This highlights the symbiotic **relationship between language competence and digital literacy - each reinforces the other**, yet formal language programmes for migrants often lack digital skills development (Bradley, Guichon, Kukulska-Hulme, 2025).

The shortage of simplified, multilingual digital resources **leaves many migrant women feeling isolated and dependent on others**. This digital marginalisation is particularly concerning, as the authors note that migrants frequently need to develop digital literacies in countries where most services are offered online and where learning is increasingly mediated by technology. Language learning among migrants is deeply connected to their digital practices, especially in societies where reading and writing are increasingly technology-mediated (Bradley, Guichon, Kukulska-Hulme, 2025).

Without adequate support addressing both language and digital literacy simultaneously, migrant women face compounded barriers that severely limit their participation in digital life, economic independence, and broader social inclusion.

Challenge(s)

Immigrant women often face significant language barriers that limit their ability to access and navigate digital platforms and services. Available resources are rarely adapted to their language level or offered in multiple languages, making digital environments inaccessible and overwhelming. As a result, many women remain dependent on others for online tasks, reducing their autonomy and digital inclusion.



Causes	Effects
Digital platforms and learning materials are primarily available in the language of the host country.	Immigrant women with limited language skills are unable to access essential information and services online.
Lack of simplified and multilingual educational content.	Women are excluded from online learning opportunities.
Low confidence in using digital tools due to unfamiliar language and terminology.	Many avoid using digital services independently and rely heavily on others for support.
Insufficient language support in digital education programmes.	Immigrant women have less opportunities for integration, employment, and personal development.

Step-by-step Proposed Solution

1. **Use simple language and visuals in digital content:** Digital platforms and learning materials should be designed using plain, easy-to-understand language, supported by icons, images, and visual instructions. This reduces cognitive overload and makes content more accessible for those with limited language proficiency.
2. **Provide multilingual and accessible formats:** Resources should be available in multiple languages and offered in multiple formats, such as transcripts, subtitles, and audio descriptions. This ensures that women with different learning styles or disabilities can access and understand the material.
3. **Integrate language and digital skills training:** Digital literacy should be embedded into existing language and vocational courses to create a more holistic learning experience. This allows migrant women to improve their language skills while simultaneously gaining confidence in using digital tools.
4. **Promote peer-led training models:** Training sessions led by trusted peers or community members can increase participation, especially among women who may feel uncomfortable joining formal programmes.

Needed in/tangible Resources

- Mobile devices, laptops, and Wi-Fi access.
- Printed multilingual materials, visual guides, and accessible content formats.
- Budget for providing technology access, internet connectivity, printed resources, training rooms, instructors, and childcare services.
- Women-only training spaces and childcare rooms if needed.
- Bilingual trainers, cultural mediators, and peer facilitators from migrant communities.
- Translators, IT support staff, and volunteers to assist with language barriers.
- Curriculum experts who can design language-inclusive digital training programmes.
- Policy specialists ensuring the programmes meet legal and accessibility standards.
- Partnerships with government departments, NGOs, community groups, and women's organisations.

Desired Outcomes

Short Term (within 4 months)

Within the first 4 months, the focus is on creating or expanding the foundational infrastructure for language support. Digital learning platforms should be adapted with multilingual interfaces, visual icons and accessible materials. Training programmes of AEIs and NGOs should ensure that participants feel supported through bilingual trainers and peer facilitators. Early outcomes include increased engagement and confidence among migrant women in using digital tools.

Medium Term (within 10 months)

By the 6-month mark, the language and digital training programmes are fully operational with broader participation. Immigrant women begin to demonstrate improved digital literacy, as well as increased ability to navigate digital platforms independently. Collaboration with local NGOs and community groups fosters a strong support network, and women feel more empowered to engage in online learning. Feedback from participants will help refine and expand the programmes.

Long Term (after 10 months)

After 10 months, the desired outcome is a sustainable, fully integrated digital education programme tailored to immigrant women's language needs. These women have gained the necessary digital and language skills to access key services in the host country, pursue online education, and enhance employment opportunities. Trust within the community is strengthened, and peer-led models have proven effective in fostering long-term engagement.

Success Indicators

Participant feedback forms, peer facilitator reports, or focus group discussions

Pre- and post-training self-assessment surveys

Practical skill assessments, digital task checklists, or completion of learning modules

Follow-up surveys on access to digital services and learning, comparison with baseline data

8.3 Action Sheet 3: Cultural Norms, Gender Dynamics & Accessibility

Responsible Implementing Actors

- Adult Education Institution (AEI) administrators and leadership
- Digital education trainers and instructors
- NGOs, migrant workers, cultural mediators, diversity and inclusion specialists and similar
- Technical support staff responsible for digital platforms

Beneficiary Target Group

- Immigrant women with limited digital literacy
- Women from cultural backgrounds with restrictive gender norms
- Migrant women - mothers - with childcare responsibilities
- Women with limited mobility or accessibility needs
- Women with limited language proficiency in host country language
- Women from trauma backgrounds or conflict zones

Scene-setter

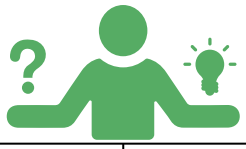
Cultural expectations and family dynamics often place women, particularly immigrant women, in primary caregiving roles, leaving them with limited time and flexibility to engage in structured digital learning.

Based on "*A Systematic Review of the Digital Divide Experienced by Migrant Women*" from 2025 **immigrant women are less likely than immigrant men to utilise ICT tools** because of the unfavourable conditions that they face, like higher unemployment, lower education, or lower income. Additionally, **in some communities, women's use of technology is actively discouraged or restricted due to cultural norms**, stereotypes, or discrimination against women (Fung, Lai, Hung, Yu & He; 2025). The findings of the International Telecommunication Union from 2023 confirm that, with the exception of the Americas, males are more likely than women to use the Internet (ITU, 2023), and women worldwide have a 26% lower likelihood of owning a smartphone (Fung et al; 2025). The differences are, however, not just between genders but also between women across the globe. Compared to 86% of women in developed nations, just 19% of women in the least developed countries utilised the Internet in 2020 (ITU, 2023).

Many digital training programmes follow standardised formats that unintentionally create barriers - rigid schedules clash with childcare responsibilities, location-bound training excludes those with limited mobility, and intimidating technical environments can trigger anxiety for trauma survivors. Similarly, GDPR compliance and digital safety considerations become even more critical for this vulnerable group, as many lack awareness of their digital rights and are at higher risk of online exploitation. Without addressing these intersecting barriers, we risk deepening the digital exclusion of immigrant women, limiting their economic opportunities and integration into European society.

Challenge(s)

Cultural expectations and family dynamics often place women in caregiving roles, leaving them with limited time and flexibility to engage in structured digital learning. In some communities, women's use of technology is even discouraged or restricted. Many training programmes are also not designed to accommodate women with childcare or elderly care responsibilities or women who experienced high trauma, this results in their exclusion from opportunities that could support their independence and empowerment.



Causes	Effects
Cultural norms designating technology as a "male domain"	Women's self-exclusion from digital learning opportunities
Family expectations prioritising women's domestic responsibilities	Exclusion of women with childcare or family responsibilities, inability to attend in-person training sessions
Limited consideration of privacy concerns specific to vulnerable women	Heightened fears around online safety and data protection
Language barriers in digital interfaces and training materials	Additional learning obstacles beyond digital literacy itself

Step-by-step Proposed Solution

1. **Cultural and Needs Assessment:** Conduct surveys / focus groups with immigrant women to understand specific cultural barriers to digital engagement. Identify appropriate strategies that respect cultural values while creating pathways for women's digital empowerment. Document specific concerns around data privacy and security that may be heightened for women from certain cultural contexts. Alternatively, refer to the results of BRIDGE focus groups across EU countries for more information.

2. **Flexible Learning:** Develop flexible training formats like micro-learning units, evening/weekend sessions, and remote participation options. Ensure clear explanations and offer in multiple languages.

3. **Support Structures:** Establish on-site childcare during training sessions, arrange transportation assistance, or create women-only training spaces when culturally appropriate. Train staff on trauma-informed approaches.

4. **Community Engagement:** Form peer learning groups among women from similar cultural backgrounds, train and employ "digital ambassadors" from within immigrant communities, and engage family members through informational sessions on the benefits of women's digital literacy. Create "family digital days" that demonstrate how digital skills benefit the entire family, particularly children's education.

Needed in/tangible Resources

- Technical infrastructure: Mobile devices, laptops, Wi-Fi hotspots
- Physical spaces: Childcare rooms available at training areas, women-only spaces when needed
- Human resources: Female instructors from diverse backgrounds, cultural mediators, childcare providers
- Educational materials: Translated learning resources, visual guides
- Technological tools: Multilingual interfaces
- Partnerships: Community organisations, women's groups, cultural associations, religious institutions

Desired Outcomes

Short Term (within 4 months)

We expect to see an increase in participation rates of immigrant women in digital safety training programmes. Culturally-sensitive training will be developed and made available in AEIs and NGOs and training will be offered in both digital and in-person formats to accommodate different needs of the target group.

Medium Term (within 10 months)

Women participating in such activities will demonstrate measurably improved digital safety practices in their daily technology use. Sustainable peer support networks will be created and functioning in immigrant communities, providing ongoing assistance and encouragement. Culturally-responsive digital rights education will be fully implemented across AEIs. Women-led technology circles will be established and actively meeting in target communities, creating safe spaces for digital skill development.

Long Term (after 10 months)

The digital gender gap among immigrant communities will show a measurable reduction compared to initial baseline. Women who participated in the program will be confident in the use of digital tools and digital safety within their communities, creating a multiplier effect for digital inclusion. Cultural sensitivity and gender dynamics considerations will be fully integrated into all digital education practices of AEIs, becoming standard procedure rather than special accommodation. Community-based support systems for women's digital inclusion will be established and operating independently, continuing beyond the project timeframe to ensure sustainability of outcomes.

Success Indicators

Number of immigrant women completing digital safety training modules

Diversity of cultural backgrounds represented in training participation

Number of flexible learning options accessed by women with caregiving responsibilities

Number of women becoming digital mentors for other women in their communities

8.4 Action Sheet 4: Fear of Technology and Psychological Barriers

Responsible Implementing Actors

- Adult education institutions (AEIs), Adult educators, NGOs working with immigrant women,
- Policy makers, Adult learning providers, Technology providers
- Government led and regional government led migrant support centres
- Community centres

Beneficiary Target Group

Migrant women excluded from digital environment because of technological barriers, lack of equipment and psychological barrier, lack of knowledge how to use digital tools, fear of “breaking the computer, tablet or smartphone.

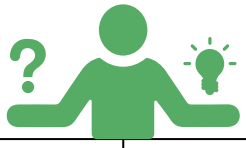
Scene-setter

Access to mobile devices, computers, and laptops among migrant women is often significantly limited and characterised by several key factors. Firstly, economic constraints frequently prevent migrant women from affording these devices, with many relying solely on basic mobile phones with limited functionality.
Secondly, lack of digital literacy and confidence creates a psychological barrier, as some women may fear using technology or lack the necessary skills to operate computers or even smartphones effectively for more than basic communication.

Findings from the project 'Step into Employment - Support and Integration Centre' a joint initiative of the Foundation Innovation and Knowledge (FIIW) and the International Rescue Committee (IRC) run in Poland for Ukrainian refugees (more than 3000 participants) reveal that refugee women often face even greater challenges than other migrant women in accessing mobile devices and computers. Several factors contribute to this disparity. Economic vulnerability is a major obstacle, as refugees often have limited financial resources and may prioritise basic needs over technology.
Displacement itself can disrupt access to and ownership of devices, as refugee women often have to flee suddenly to protect their lives and the lives of their loved ones, taking personal belongings like computers is often a very low priority at that moment. Also legal restrictions in some host countries might limit refugees' ability to register for SIM cards or access certain services required for device functionality.

Challenge(s)

Access to affordable devices and Internet. Many migrant and refugee women lack the financial resources to purchase smartphones, laptops, or tablets and to afford consistent internet access, hindering their ability to participate in the digital environment.
Lack of digital literacy and confidence: A significant number of migrant women lack the fundamental skills and self-assurance needed to effectively use digital tools and navigate online platforms, creating a psychological barrier to engagement in the digital environment, age is also a contributing factor.



Causes	Effects
Limited availability of technological tools	Reduced opportunities for skill development through online learning
Psychological barriers and technology fear	Reluctance to explore and utilise digital resources even if they exist
Insufficient understanding of online risks	Increased vulnerability to online scams, misinformation, and privacy breaches
Lack of basic computer skills	Inability to perform essential online tasks such as registrations, online learning

Step-by-step Proposed Solution

1. **Establish accessible technology resource points:** Partner with local businesses, NGOs and community organisations to collect donations or apply for funding for new and pre-owned devices. Create a transparent system for refurbishment and distribution of pre-owned devices to migrant and refugee women based on need.
2. **Equip and secure community digital hubs:** Identify and equip existing community centres with secure computer workstations and reliable internet access. Ensure these hubs have a supportive environment with designated times and personnel available to assist clients and provide basic technical support in relevant languages.
3. **Deliver culturally sensitive basic computer skills training:** Develop a foundational computer skills curriculum specifically tailored to the needs and cultural contexts of migrant and refugee women. This includes, for example, basic operating system navigation, internet usage, email communication, and document creation.
4. **Integrate a module on overcoming technology fears:** Include a dedicated module within the basic computer skills training that directly addresses psychological barriers and technology fear. Offer ongoing support and opportunities for participants to ask questions and practice in a low-pressure setting at the community digital hubs.

Needed in/tangible Resources

- Funding for equipment and programmes supporting digital skills development
- Technical infrastructure: Mobile devices, laptops, Wi-Fi hotspots, SIM cards
- Physical spaces: Technology rooms and cafe at migrant community centres
- Human resources: Instructors from diverse backgrounds,
- Technological tools: Multilingual interfaces
- Partnerships: Cross-sectoral cooperation including NGOs, community centres, technology providers, learning providers and public sector representatives

Desired Outcomes

Short Term (within 4 months)

A measurable number of migrant and refugee women will have gained access to functional technological devices (smartphones, tablets, or laptops) through the donation and refurbishment programme. Participants in the initial training cohorts will report a noticeable decrease in their fear and anxiety related to using technology, expressing increased confidence in interacting with digital devices.

Medium Term (within 10 months)

A larger number of migrant and refugee women will have completed the basic computer skills training and will be actively using their skills to access online information, communicate with support networks, and explore online learning opportunities relevant to their needs. Designated community centres will be equipped with secure computer workstations and internet access, and a growing number of migrant and refugee women will be actively using these resources.

Long Term (after 10 months)

A larger network of device donations and refurbishment will be established, ensuring a continuous supply of technology for migrant and refugee women. A significant number of women who completed the basic computer skills training will report increased confidence in their ability to search and apply for jobs online, access online government services, and participate in online learning opportunities, contributing to their economic and social integration.

Success Indicators

Number of first time technology users

Number of initiatives boosting technological confidence among migrant women

Number of migrant community centres offering well-equipped technology rooms

Number of migrant women having access to unrestricted, various types of technological devices

8.5 Action Sheet 5: Digital Complexity and Technical Barriers

Responsible Implementing Actors

Educators, trainers and tutors should take a leading role in tackling this problem.
Another group that is essential for the reduction of the barriers are the migrant women themselves. As a community they can greatly benefit from its strong peer network.
Creators of digital offers could also play a significant role in helping the issue, by altering design principles to be more inclusive. However this approach will not be the main focus of this action sheet.

Beneficiary Target Group

The main target group benefitting from the proposed actions will be the group of migrant women. Even so the results from this action plan can also produce a curbside effect, as learning materials in simplified languages, visual aids, tutorials and planned courses can also help other marginalised groups (e.g. people with disabilities or a low general education).

Scene-setter

The landscape of digital services is vast and changes rapidly. Developers do not always adapt their applications to the learning curve of users. New apps and services are released constantly and the next UI change in the existing apps is never far away. Keeping up with all these changes is hard, even with good foundational knowledge of the digital world and the right language skills. When these two factors are lacking, successful navigation of the digital world becomes an insurmountable barrier.

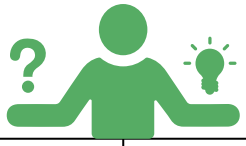
In a current Eurobarometer regarding the initiative “Digital Decade” of the EU, 72% of the people questioned believe that further training and education with digital skills would enhance the adoption rate of digital services. Even more pronounced is the opinion that support from real humans would increase adoption further.

An article on the International Computer and Information Literacy Study (ICILS), where school children performed a test regarding their digital literacy, observes that children with a migrant background perform less well than their peers. This gap is especially evident when the language spoken at home and the language spoken in the school are not the same. This points toward the fact that digital literacy and language skills are linked.

To lessen digital complexity and technical barriers there needs to be an approach from at least two directions. For one, a more inclusive design on the side of the developer of digital services can be promoted. On the other side there needs to be an increase of the skill to deal with the complexity. The first solution is mentioned, but the second solution is more feasible to be implemented. An example for a best practice in regards to the training side of the solution is the ReDI school of digital education. This organisation is a leading provider of digital education tailored towards migrants, with the specific hurdles the group faces in mind.

Challenge(s)

Even basic digital tasks like joining a video call, uploading a document, or resetting a password can become barriers when platforms assume users are already digitally fluent. For immigrant women with little computer experience, these tasks often require trial and error or outside help. Unclear design, technical language, and rigid systems can cause frustration and reduce engagement with digital tools or services.



Causes	Effects
Lack of knowledge about self help	The frustration with technology leads to less adoption or accidental misuse
Overload of different apps and UIs	Skills gained in one app are usually non transferable to others
Accessible community support	Offers for help can be obtuse or too complex
Lack of multilingual / simplified language support	Language barriers as well as technical jargon make the help provided inefficient

Step-by-step Proposed Solution

1. **Design of learning material:** Creation of course work for target audience of migrant women, focusing on basic digital literacy and general skills like problem-solving as well as guides to find self help resources. The learning material should be translated into multiple languages based on the languages spoken by the target group.
   Existing materials for inclusive design of digital offers is to be gathered and checked for efficacy.

2. **Establishment of workshops:** These should be kept flexible to meet the diverse needs of the target group. Common concerns need to be addressed, like the fear of breaking software or hardware. Guides for self-help should include basic computer knowledge, but also instructions on how to use AI tools to get further instructions.

3. **Dissemination of all materials:** The created learning materials, guidelines for courses and the vetted resources for inclusive design, should be made available for download for use in other institutions. Print runs of the learning materials can also be useful to circumvent existing digital barriers

4. **Establishment of peer network:** Participants in workshops that show technical aptitude as well as good social skills, should be empowered to help their community. These women should receive continued support for their role as “digital navigators”.

Needed in/tangible Resources

Tangible Resources

- Monetary (Funds for courses, hosting of learning materials, printing of learning materials)
- Infrastructure and technology (training spaces, devices with internet access, printed material, means of digital dissemination and digital tools)

Intangible Resources

- Human Factor (teachers, tutors, translators and designers,both of learning materials, and of digital services)
- Networks (NGOs, learning institutions, government institutions, tech companies)

Desired Outcomes

Short Term (within 4 months)

- Creation of learning materials as well as translating them into required languages
- Collection of materials for designers of digital offers
- Collaboration with institutions that work with migrant women to facilitate more participants and prepare further dissemination
- Preparation for courses (procurement of spaces, teachers, participants and devices)

Medium Term (within 10 months)

- Start of the workshops
- Launch and disseminate learning materials digitally and in print
- Look out for candidates to be trained as “digital navigators”
- Improved digital skill and skill in self help in the target group
- Feedback rounds with educators and participants to improve existing materials

Long Term (after 10 months)

- Further dissemination of all materials, especially after improvements have been made
- Continued support for “digital navigators”
- Increase in inclusive design in digital services

Success Indicators

Access numbers to web offers

More inclusive designs in digital services

Participation rates in the courses

Confidence and skill gained by the target group

Higher adoption rates of digital offers

09

Recommendations for Policy, Capacity & Practice

9.1 Identifying Training Needs Across Participating Countries

Austria

In Austria, while digital literacy is a recognised priority, specific gaps remain for migrant women and other marginalised groups. The training needs identified reflect both structural barriers (e.g., lack of access to devices and stable internet) and pedagogical gaps in adult education programmes. Notably, basic digital skills and GDPR compliance training are seen as urgent for women with limited education and language barriers. A distinct feature in Austria is the recognition that train-the-trainer programmes are necessary to enable educators to deliver inclusive and culturally sensitive digital training. Furthermore, practical applications for everyday life (e.g., accessing public services, using digital tools safely) are in high demand but underrepresented in current programmes. Thus, Austria's training needs highlight the necessity of combining technical skills with practical and rights-based knowledge (e.g., GDPR) in a multilingual format.

Cyprus

In Cyprus, the identified training needs are shaped by the high share of migrants and asylum seekers, many of whom face multiple and overlapping barriers. The analysis of needs underscores the urgency for foundational digital literacy and safety training, especially for women with no prior digital experience. A notable aspect is the lack of GDPR awareness among immigrant women, coupled with cultural and linguistic barriers, which prevent access to mainstream adult education. An important training need emerging from Cyprus is the development of culturally sensitive, multilingual materials, especially for topics such as online safety, privacy, and access to public services. Additionally, educators and AE stakeholders in Cyprus require specialized training to address the complex intersection of migration, gender, and digital education — an area currently not covered by institutional frameworks.

Czech Republic

The analysis of training needs in the Czech Republic reflects challenges linked to rapid digitalization of services and insufficient adaptation for migrant and vulnerable groups. Particularly, migrant women face a lack of accessible, beginner-friendly digital skills training, with an additional emphasis on cybersecurity and GDPR being urgently needed. A unique feature of Czechia's situation is the limited availability of multilingual resources, especially for Ukrainian refugees and other non-Czech speakers. Another specific training need identified is confidence-building activities, as many women report fear of using digital tools. Thus, the training needs analysis for Czechia stresses that combining basic digital training with security and GDPR knowledge, plus emotional/psychological support, is crucial for effective inclusion.

Germany

In Germany, the analysis points to fragmented access to digital education for migrant women, despite the existence of several innovative initiatives (e.g., ReDI School, Stark im Beruf). The key training needs identified revolve around basic digital literacy and practical online safety knowledge, with a focus on understanding GDPR and recogniing online threats (e.g., scams, misinformation). Germany's specific challenge lies in integrating digital training into existing language and vocational courses, as many women struggle to attend separate digital literacy programmes. Additionally, flexibility in learning formats (online, hybrid, in-person) is needed to accommodate caregiving responsibilities. Peer learning and mentoring also emerge as essential to build trust and sustain motivation. Therefore, Germany's training needs reflect the importance of embedding digital literacy and safety education into broader integration programmes, ensuring accessibility and relevance.

Poland

The training needs analysis for Poland highlights the intersection of language barriers and low digital literacy among immigrant women. Although there are some NGO-led initiatives, there is a clear lack of systematic, nationwide approaches combining digital literacy, GDPR, and online safety training. Women require practical, scenario-based workshops that address real-life situations, such as navigating government platforms (e.g., mObywatel) and avoiding online fraud. A critical training need is for multilingual resources, especially in Ukrainian, Russian, and other relevant languages. Importantly, peer-led training models are identified as effective for engaging participants, as trust issues often prevent women from joining formal programmes. Thus, Poland's analysis emphasizes the need for integrated, accessible, and culturally sensitive digital training formats, including basic and advanced levels adapted to different starting points.

Key Insights - Digital Literacy in Europe

- **Age-Related Disparities:** Digital proficiency tends to decline with age. For instance, in 2023, 69% of EU men aged 25-34 had at least basic digital skills, while only 34% of those aged 65-74 reported the same (Eurostat, 2024).
- **Gender Differences:** Among younger age groups (16-24 and 25-34), a higher percentage of women possess basic digital skills compared to men. However, this trend reverses in older age groups, where men surpass women in digital proficiency (Eurostat, 2024).
- **Library Initiatives:** Every year, approximately 4.6 million Europeans access the internet for the first time at their public library, and 2.3 million attend a digital literacy course, emphasising the pivotal role of libraries in digital inclusion (Stihler, 2016).

9.2 Overview of Existing Trainings and Offers

Country	Training/Offer Name	Target Group	Focus
Austria	**A1 Seniorenakademie**	Seniors	Digital inclusion for seniors, GDPR, online scams
	dig_mit!	Migrant women	Digital skills, labour rights, empowerment
	Digital Überall	Seniors, migrants, women, people with disabilities	Basic digital literacy, online safety, GDPR
Cyprus	**Digital4ALL**	Youth including marginalised communities	Digital literacy, safety, gamified learning
	e-Learning for Change	Refugees, migrants	Online language & digital skills
	Embrace Your Rights	Refugee women survivors of GBV	Culturally sensitive counseling & digital safety
Czech Republic	**Česko.Digital**	marginalised groups including migrants, refugees, older adults	Digital inclusion, access to public services
	Czechitas – Women in IT	Women (including migrants) entering the IT field	Coding, cybersecurity, AI, IT careers
	Google User Group (GUG) & Digital Change	General public, women, educators	Digital literacy, safety, community learning

Country	Training/Offer Name	Target Group	Focus
Germany	**ReDI School of Digital Integration**	Migrants, refugees, marginalised people	Strong tech-industry partnerships
	Stark im Beruf	Migrant mothers	Integrated into broader support programmes
	MY TURN – MY POWER	Migrant women in Rostock region	Personalised empowerment, focus on psychological stabilisation
Poland	**DigiWelcome**	Migrant women, refugees	Multilingual, childcare provided, Cisco-funded
	My Digital Life	General public, vulnerable groups	Practical workshops, integrated with community work
	#WELCOME vol. 3 – Mamo Pracuj Foundation	Polish and refugee women (esp. mothers)	Employment and entrepreneurship support, mentoring, language training, peer networking

9.3 Bridging Gaps Between Policy and Practice on National and EU Levels

European institutions emphasize the importance of adult learning as a foundation for inclusive, democratic, and cohesive societies (European Commission, 2024). The European Commission identifies adult learning as a **critical part of lifelong learning** and a **tool for personal development**, employability, and social inclusion (Ibid.). However, a gap persists between the policy frameworks developed at the EU level and their implementation within national adult education systems (European Commission ET2020, 2015). This gap becomes particularly visible in how adult learning addresses digital transformation and the inclusion of vulnerable groups, such as immigrant women and low-skilled adults (EAEA, n.d.).

EU-Level Vision for Adult Education

The EU has consistently promoted adult learning through comprehensive policy frameworks (European Commission ET2020, 2015). The **"Education and Training 2020"** (ET 2020) strategy aimed to make lifelong learning and mobility a reality while enhancing the quality and efficiency of education and training systems (Ibid.). It recognised the need to increase participation in adult learning and stressed the importance of flexible learning pathways and transversal competences, including digital skills (Ibid.).

The Council Recommendation on blended learning in education and training encouraged member states to develop inclusive and high-quality educational models combining digital and physical learning environments (Council of the European Union, 2021). This recommendation **builds upon the ET 2020 strategic framework** and reflects lessons learned during the COVID-19 pandemic, which exposed both the potential and limitations of digital learning in adult education (Ibid.).

Organisations such as the European Association for the Education of Adults (EAEA) have further reinforced this vision (EAEA, n.d.). EAEA advocates for the integration of adult education into European and international policies as a means of ensuring democracy, gender equality, sustainability, and active citizenship (Ibid.). It stresses the transformative potential of adult learning and its ability to address social inequalities (Ibid.).

Challenges at the National Level

Despite these commitments, many member states face **structural and operational barriers** that prevent full implementation of EU adult learning strategies (European Commission ET2020, 2015). National governments vary significantly in how they prioritise adult learning, often depending on political will, funding, and institutional frameworks (Ibid.). Several countries treat adult education as peripheral to **mainstream education** policy, resulting in fragmented provision and inadequate outreach to marginalised populations (Ibid.).

Digital transformation policies often fail to **consider the specific conditions** under which adult learners access technology (European Commission, 2024). The European Commission notes that millions of adults in Europe still lack basic digital skills, yet adult learning systems are not always equipped to bridge this gap effectively (Ibid.). Infrastructure issues, limited access to devices, and insufficient digital pedagogical training for educators exacerbate exclusion (Ibid.).

Furthermore, vulnerable groups—especially those with limited prior schooling, migrant backgrounds, or caregiving responsibilities—are less likely to **access adult learning opportunities** (EAEA, n.d.). These learners often face complex socio-economic barriers that are not adequately addressed by national strategies, leading to a misalignment between EU policy objectives and their realization on the ground (Ibid.).

Structural Weaknesses in Policy Translation

A core issue lies in the disconnect between **strategy and execution** (European Commission ET2020, 2015). The ET 2020 evaluation emphasized the need for stronger cross-sector collaboration and policy coherence (Ibid.). In practice, responsibilities for adult learning are frequently divided among different ministries and local authorities, making coordination difficult (Ibid.). Systems for monitoring and evaluating progress are often weak or inconsistent, making it harder to adjust programmes based on evidence (Ibid.)

The Council Recommendation on blended learning recognised these structural challenges and encouraged member states to develop national digital education strategies that are responsive to local needs and inclusive of adult learners (Council of the European Union, 2021). However, translating these recommendations into policy requires sustained investment and stakeholder engagement (Council of the European Union, 2021).

Bridging the Gap

To better align national practice with EU policy, several measures can be taken:

1. **Embed EU adult education goals into national development strategies,** ensuring that adult learning is recognised as a pillar of social and economic policy (European Commission ET2020, 2015).
2. **Provide systematic professional development for adult educators,** especially in digital pedagogy and inclusive practices (Council of the European Union, 2021).
3. **Foster collaboration** between government bodies, civil society, and educational providers to design more responsive and cohesive systems (EAEA, n.d.).
4. **Involve learners**—especially those from marginalised backgrounds—in shaping adult learning programmes that meet their real-life needs and circumstances (EAEA, n.d.).
5. **Develop robust frameworks** for assessing adult learning participation, outcomes, and alignment with EU goals (European Commission ET2020, 2015).

9.4 Long-Term Strategies for Sustainability

1

Digital exclusion is identified as a serious barrier to adults' personal growth, employment opportunities, and social engagement. Addressing these challenges requires long-term, sustainable strategies that go beyond one-off projects. A first pillar is the **promotion of lifelong digital learning** opportunities. Policymakers and educators increasingly recognise that digital skills development must be an ongoing process throughout adulthood, not a one-time training. The European Year of Skills 2023, for example, emphasises giving "fresh impetus to lifelong learning" to help people and organisations adapt to green and digital transitions (European Commission, n.d.). In practice, this means integrating digital literacy across adult education curricula – from basic education and vocational training to community learning programmes – so that adults continually update their skills as technology evolves (Ibid.). **Sustainable initiatives** like community tech workshops, online courses for seniors, and peer learning circles can help cultivate a culture of lifelong learning. In the Erasmus+ DigIN project, participants attend regular workshops and courses to stay updated on new technologies, reflecting a philosophy of continuous education for personal and professional growth. Such approaches ensure that digital competence is built and reinforced over time, enabling adults to remain safe and included in the digital world as it changes (DIGIN, n.d.).

2

Another key strategy is strengthening cross-sector collaboration to create an inclusive digital ecosystem. No single sector can achieve digital inclusion alone; partnerships among governments, educational institutions, non-profits, and the private tech sector are crucial. Cross-sector collaboration can mobilise resources and expertise to reach underserved learners.The World Economic Forum highlights that **broad coalitions** are needed to **reduce inequalities and drive digital inclusion**, urging stakeholders from different sectors to work together (World Economic Forum, 2021). For instance, public libraries and NGOs might partner with telecom companies to provide free internet access and digital skills training in marginalised communities. Likewise, adult education centres can collaborate with industry to develop relevant digital curricula or certification programmes that improve learners' employability (Ibid.). These collaborations should also extend **internationally**. Sharing best practices and coordinating efforts (through platforms like UNESCO's Global Alliance for Literacy or the EU's Digital Skills and Jobs Coalition) can amplify impact and avoid fragmented short-term interventions. **Policy coherence** is essential here: aligning national strategies for adult education, digital infrastructure, and workforce development ensures that all policies collectively support the goal of an inclusive digital society.

3 **Investing in educator capacity and inclusive pedagogy** is a system-level solution with long-term benefits. Governments and institutions should provide sustained professional development for adult educators in digital pedagogy, online facilitation, and cyber safety. With the right training, educators can not only teach digital skills but also embed digital safety awareness—such as critical thinking about online information, privacy best practices, and protection against fraud—into their instruction. **Inclusive instructional design** is another best practice: using approaches like **Universal Design for Learning (UDL)** to ensure that digital learning materials are accessible to adults of all abilities and backgrounds. By designing content with accessibility features and offering multiple ways for learners to engage (e.g. text, audio, interactive activities), educators can reduce barriers for those with disabilities or low literacy, making digital inclusion truly universal. Furthermore, **addressing language and cultural relevance** in digital content encourages participation from minority and immigrant adult learners, enhancing inclusion. These pedagogical strategies contribute to a safe learning atmosphere where adults feel respected and supported online.

4 Crucially, **policy and governance frameworks** must underpin these efforts to ensure they are sustainable. This involves enacting and enforcing policies that guarantee affordable internet access, protect data privacy, and fund adult learning initiatives. International organisations call on policymakers to adopt holistic inclusion strategies: UNESCO recommends that digital education policies balance the benefits of technology with safety, target the needs of vulnerable groups, and allocate resources for connectivity and tools (Unesco, n.d.). In the European context, strategies like the **Digital Education Action Plan 2021–2027** and the **European Skills Agenda** encourage member states to improve infrastructure, provide devices to disadvantaged learners, and invest in upskilling programmes (European Commission, 2023). Long-term public funding (complemented by private sector contributions) is needed to maintain these programmes beyond initial pilot phases. Additionally, **establishing benchmarks and monitoring progress**—such as tracking adult digital skill levels and safe technology use over time—helps ensure accountability and continued focus on inclusion goals. Policy coherence also means **aligning data protection laws** (like GDPR in Europe) with educational practices so that learning platforms and institutions uphold high standards of privacy and security (Ibid.). By embedding these protections in the system, adult learners' trust in digital education can be strengthened. Overall, a **whole-of-society approach** – involving coordinated action across education, technology, labour, and social policy domains – offers the most sustainable path to closing the digital divide while safeguarding users' rights.

10

Conclusion & Future Directions

10.1 Summary of Key Takeaways

The BRIDGE Guidebook delivers a comprehensive and practice-oriented approach to strengthening digital safety, GDPR compliance, and inclusivity in adult education institutions (AEIs). It combines solid theoretical grounding with ready-to-use tools tailored for educators, managers, and learners working with vulnerable groups, particularly immigrant women, seniors, and low-educated adults. Below are the key takeaways based on the Guidebook's full content:

Structured Around Real Needs

The Guidebook is informed by mixed-methods research across five countries (Austria, Germany, Poland, Czechia, Cyprus) and directly addresses real-world challenges in AEIs. These include low digital literacy, lack of awareness of GDPR rights, language barriers, and limited access to safe digital tools.

Packed with Practical Tools

The Guidebook includes a total of 5+ hands-on tools, such as:

- **GDPR Checklist**
  - General Compliance
  - Consent & Data Minimisation
  - Rights of the Data Subject
- **5 Action Sheets (**for staff and institutional change)
- **2 Inclusivity Protocols & Guidelines**

Each tool is designed to be immediately applicable in AEIs and supports alignment with EU standards (GDPR, DigComp, DigCompEdu).

Institutional Change Is the Goal

Beyond individual training, the Guidebook provides a framework for organisational transformation, including:

- A model for assessing **readiness for digital change**
- A **step-by-step plan** for implementing safer, more inclusive systems
- Tools to **monitor and evaluate** institutional progress

This ensures digital safety becomes a core institutional value, not just a compliance task.

Inclusivity as a Design Principle

The Guidebook introduces strategies to engage vulnerable learners through:

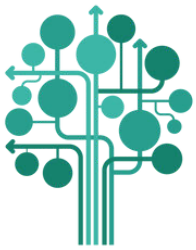
- **Motivational access** (building confidence and trust)
- **Material access** (addressing device/internet gaps)
- **Usage access** (hands-on skill development)

It emphasizes gender-sensitive, multilingual, and peer-supported approaches and includes the concept of "radical inclusion" — making digital education fully open and participatory.

10.2 Envisioning the Future of Inclusive and Safe Adult Education

The future of adult education hinges on harmonizing technological innovation with ethical imperatives, ensuring equitable access, and fostering environments where all learners thrive. As digital transformation accelerates, adult learning systems must evolve to address emerging challenges in inclusivity, safety, and sustainability.

EPALE's 2025 Focus on the Future of Adult Learning



The **European Commission's Electronic Platform for Adult Learning in Europe (EPALE)** outlines four thematic priorities for 2025 that aim to shape a forward-looking, inclusive, and sustainable adult education landscape (EPALE, 2025). These themes—inclusive learning communities, digital transformation, sustainability, and active citizenship—are designed to help adult learning systems across Europe adapt to current and future challenges (Ibid.).

In 2025, **EPALE** will place a central focus on creating inclusive learning communities. This means building environments in which every adult learner—regardless of background—feels welcome, supported, and empowered. The goal is to **dismantle systemic barriers** that continue to exclude marginalised groups, including people with disabilities, migrants, or adults with limited formal education. These communities are not only learning spaces but also support systems, where connection, collaboration, and shared responsibility play vital roles (Ibid.).

The second focus, **digital transformation**, responds to the growing importance of digital tools in both personal and professional life. EPALE stresses the need for adult education providers and educators to strengthen digital competences—not only in technical terms but also in terms of inclusion and ethics. There is a strong call to **bridge the digital divide** and **ensure equitable access** to digital learning. This involves training educators, updating curricula, and developing digital strategies that consider vulnerable groups who risk being left behind (Ibid.).

Sustainability is the third thematic priority and is closely tied to Europe's broader Green Deal agenda. Adult learning is recognied as a key player in promoting environmental awareness, climate literacy, and green skills. EPALE encourages **integrating sustainability into all levels of adult learning,** from grassroots community education to formal vocational programmes. The objective is to empower learners to contribute to a more climate-resilient and environmentally responsible society (Ibid.).

Lastly, EPALE highlights **active citizenship** as a cornerstone of **democratic and cohesive societies**. Adult education has the responsibility to encourage civic engagement, promote democratic values, and enhance media literacy (Ibid.).

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Abbreviation List

AE - Adult Education

AEI - Adult Education Institution

AI - Artificial Intelligence

CM - Change Management

DigComp - Digital Competence Framework for Citizens

DigCompEdu - Digital Competence Framework for Educators

DPO - Data Protection Officer

DSG - Datenschutzgesetz (Austria) - Austrian Data Protection Act

EACEA - European Education and Culture Executive Agency

EEA - European Economic Area

ENISA - European Union Agency for Cybersecurity

EPALE - Electronic Platform for Adult Learning in Europe

EU - European Union

GDPR - General Data Protection Regulation

GUG - Google User Group

ICT - Information and Communication Technology

IT - Information Technology

JRC - Joint Research Centre (of the European Commission)

KPI - Key Performance Indicator

NGO - Non-Governmental Organisation

OCF - Organisational Change Framework

OECD - Organisation for Economic Co-operation and Development

ROI - Return on Investment

SAR - Subject Access Request

UDL - Universal Design for Learning

URL - Uniform Resource Locator

WCAG - Web Content Accessibility Guidelines