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European Director
Susan FLOCKEN

ETUCE-CSEE

Boulevard Bischoffsheim 15
1000 Brussels | BELGIUM
secretariat@csee-etu.org
+32 2 224 06 92

ETUCE position on the Proposal for a Council Recommendation on blended learning for high quality and inclusive primary and secondary education

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Background:

On 5 August 2021, the European Commission put forward a proposal for a “[Council Recommendation on blended learning for high quality and inclusive primary and secondary education](#)”. The roadmap for this initiative, originally published with the provisional name of ‘online and distance learning in primary and secondary education’ was subject to a [public consultation](#) of four weeks between April and May 2021 to which [ETUCE contributed](#). This proposal for Recommendation feeds into the EU response to address the COVID-19 crisis and is part of the implementation of [the Digital Education Action Plan](#) and the [European Education Area \(2030\)](#). The Proposal seeks to provide a common definition of blended learning in formal education and training explaining that blended learning occurs “**when a school, educator or learner takes more than one approach to the learning process:– blending school site and distance learning environments; and – blending different tools for learning that can be digital (including online) and non-digital as part of learning task**”. Therefore, the proposal puts forward **short-term measures** to tackle the impact of the COVID-19 and **long-term measures** to implement a long-lasting approach to blended learning. In order to implement this Recommendation, the Commission proposes “to develop, in cooperation with the Member States, **specific guidance material, handbooks and other concrete deliverables**, based on evidence, **peer learning activities and identification of good practice**”. The document is expected to be presented for adoption by the EU ministries of Education within the [Education Council meeting on 29 November 2021](#).

The following position paper represents the view of ETUCE* - which is the voice of 11 million teachers, academics, and education personnel across Europe – on the proposed Recommendation.



Timing of the publication and lack of consultation with education trade unions:

Teachers across Europe have been coping with the impact of the COVID-19 for two school years now, and education trade unions have been working tirelessly to support education personnel to ensure decent salaries and working conditions. In this context, as regards the public consultation for this initiative, ETUCE regrets that, contrary to other initiatives that allowed two rounds of consultations, this proposal was only opened for a short-period consultation (13 April 2021 -13 May 2021) despite the unprecedented impact that blended learning is having on teachers and students, especially in times of COVID-19. In addition, ETUCE regrets the Commission's decision to publish the proposal during the summer vacation period in the month of August when the majority of European citizens, teachers, education social partners and the education stakeholders across Europe were on holiday and could not provide their feedback on this proposal. Furthermore, ETUCE reminds that it is essential that the Commission designs the initiatives for the education sector in close cooperation with the working groups within the [European policy cooperation framework](#) on education and training, in which education trade unions are represented. In this context, it is particularly regrettable that the Commission decided to work on a blended learning initiative during a period where no working group was functioning and, therefore, no proper collaboration with education trade unions and education stakeholders was taking place.

For all these reasons, education trade unions cannot support this initiative and urge the European Commission and the EU Member States to postpone its adoption to allow appropriate consultation with education trade unions and education stakeholders and to carefully address the risks of a blended learning initiative on the quality of education and working conditions of teachers.

Is primary and secondary education mature to blended learning?

ETUCE acknowledges the importance of enabling teaching and learning methods in education to evolve – with adequate support and sustainable public funding - in accordance with the challenges of the 21st century in order to ensure quality and inclusive education to all, including in the context of the digital and green transition. However, while the proposed recommendation underlines “the opportunities created by blending learning, including improving the quality and inclusiveness of education and training, and the broad competence development and well-being of learners”, **ETUCE remarks that the proposal misses analysing the challenges related to blended learning and the limitations that its implementation entails.** Indeed, **while blended learning can be an approach, among many others, to enhance quality and inclusion in education, its positive impact is neither automatic nor granted.**

Education trade unions point out that the current use of blended learning in primary and secondary education is still substantially characterised by the emergency settings of the COVID-19 pandemic, as it is also shown by the examples of blended learning applications provided by the EU Commission's working papers accompanying this initiative.

The adoption of a blended learning approach within the emergency teaching and learning during the COVID-19 pandemic has posed unprecedented challenges to the education sector. Among the main concerns of education trade unions, are inadequate infrastructure, lack of sustainable public funding to education and increasing privatisation, increased workload for teachers and education personnel,

deteriorated working conditions, lack of support and training on digital education, challenges to the mental health and well-being of teachers and students, e.g. increased risks of stress factors, hindered work-life balance, social exclusion.

While blended learning is a tool to innovate teaching and learning, the enormous difficulties encountered during emergency teaching and learning have clearly shown that **teachers still miss adequate tools to overcome the challenges deriving from blended teaching and learning**. These include access to digital equipment, shortage of teachers and supporting staff, increasing workload and deteriorated working conditions for teachers, increasing student drop-out and new challenges on health and safety of teachers and students

Besides, in the primary and secondary education sectors, the social contact between teachers and students and the face-to-face teaching has proved to be of irreplaceable value to ensure the best pedagogical methods and students' outcomes as well as to foster the full development of the children's potential.

Education trade unions emphasise that **before any political recommendation on blended learning is designed for these levels of education, it is essential to dedicate further research to assess the pedagogical value of blended learning out of an emergency context, including the risks and challenges in terms of working conditions of teachers and learning possibilities for students**.

Conditions required for adequate policy recommendations on blended learning in primary and secondary education, including the VET sector:

ETUCE highlights that certain conditions must be fulfilled before formulating policy recommendations on blended learning in primary and secondary education:

1. Provide a clear and commonly agreed definition of blended learning

According to the proposed Recommendation, *"blended learning in formal education and training happens when a school, educator or learner takes more than one approach to the learning process: – blending school site and distance learning environments; and – blending different tools for learning that can be digital (including online) and non-digital as part of learning tasks."* ETUCE welcomes the European Commission's effort to provide a common definition of blended learning. However, education trade unions firmly point out that **this definition lacks numerous crucial elements of clarity:**

While the proposal describes blended learning as a hybrid approach, emphasising its flexibility and its potential to encourage independent study, **further clarifications are needed regarding the definition of blending school site and blending learning tools**, which, according to the European Commission, can include **both digital and non-digital tools**. In this respect, education trade unions emphasise the importance to ensure that blended learning is integrated as a complementary tool, among others, to support teachers in the context of face-to-face teaching, while ensuring teachers' freedom to decide whether it is beneficial to apply 'blending school sites' and/or 'blending tools'.

Conversely, as it is defined in the proposed Council Recommendation, the concept of blended learning risks being easily confused with the experience of emergency remote, hybrid and online teaching during the COVID-19 pandemic. In this respect, ETUCE stresses that the Council Recommendation must state clearly **that blended learning should not be associated with the practices of emergency teaching and learning experienced during the COVID-19 pandemic**. These have proven detrimental to the quality and inclusion of education as well as the working conditions of teachers and learning opportunities for students, in particular those with a disadvantaged socio-economic background.

It is further essential to clarify that **blended learning can only be effective if used as a complementary tool available for teachers and students in the context of face-to-face teaching**. ETUCE emphasises that the experience of the COVID-19 pandemic has demonstrated that **fully online, hybrid or remote education environments are not an adequate solution to provide quality and inclusive education out of an emergency context**. In this regard, **blended learning should not leave room for expectations from or attempts by education authorities to redefine the role of teachers in education and their working conditions such as working in fully hybrid, online or remote teaching environments**.

In addition, an effective definition of blended learning should further be based on a whole-school approach that considers the needs of teachers, students, and their families as well as the specificity of education in the national, regional, and local context.

ETUCE underlines that it is essential to clarify the definition of blended learning before any adoption by the Education Council of the European Union on 29 November 2021, which will, otherwise, lead to a distorted perception of this Recommendation by national education authorities. This will have a serious impact on the working conditions of teachers, learning outcomes of students and burden on parents, and particularly, women, as well as on the quality and inclusion of education as a whole.

2. Ensure meaningful social dialogue and consultation with education trade unions

ETUCE calls on the European Commission and the Member States to ensure that any policy recommendation on blended learning is formulated through **meaningful social dialogue and consultation with education trade unions**. Furthermore, any possibility to apply blended learning in the education sector must be designed in full respect **of collective bargaining mechanisms** as the main instrument to define the working conditions of teachers and education personnel. Besides, it is essential to integrate blended learning within face-to-face curricula in a way that positively contributes to the quality and inclusive learning of the students, including ensuring access to good teaching and learning environments, providing necessary tools, and support, to the teachers to teachers and students.

3. Protect the importance and centrality of face-to-face teaching and learning in education

Furthermore, ETUCE calls on the EU Member States to ensure that blended learning **is not used as an attempt to replace face-to-face teaching with hybrid, online and remote teaching**. Indeed, the experience of emergency online teaching and learning during the COVID-19 pandemic has shed light on the irreplaceable value of face-to-face teaching and continued interaction and feedback between teachers and students to ensure quality and inclusive education. In this context, it is vital to ensure

that **blended learning is not used as a pretext to make cuts to public investment in education or as a cheap tool to substitute face-to-face teaching and replace education personnel.**

4. Respect the role of teachers and education personnel, ensure decent working conditions and respect the professional autonomy of teachers

The European Commission emphasises the need to ensure enough flexibility in blended learning “to allow adaptation to learners’ needs and freedom for educators to adapt it according to their context and audience.”. **In this respect, trade unions** point out that during the COVID-19 pandemic, the concept of ‘**blended learning**’ has been used by education authorities, without a proper definition, with the aim to **redefine the role of teachers in education and their working conditions**. Education trade unions are seriously concerned that the provided definition of blended learning in the Council Recommendation will further support national governments’ attempts to use blended learning as the opportunity to **make budget cuts** to the education sector and further **deteriorate the professional autonomy** and working conditions of teachers as well as learning conditions of students.

ETUCE further calls on the Member States to fully respect the professional freedom of teachers and other education personnel who are best placed to decide how to best integrate the use of blended learning tools in the context of face-to-face teaching in accordance with their pedagogical methods. Therefore, ETUCE urges to **replace the concept of “freedom for educators” in the proposed Recommendation with the fundamental value of “professional autonomy” of teachers as enshrined in “[the Council Conclusion on teachers and trainers for the future](#)”(2020).**

ETUCE considers that blended learning must respect the workload, working time and decent working conditions of teachers and ensures a supportive working environment for them. Therefore, blended learning must be implemented within the teaching hours and must not give rise to additional workload to teachers and other education personnel.

ETUCE welcomes the Commission’s proposal for “enhanced individualised support and personal tutoring, mentoring systems (including peer mentoring), additional learning time during the school year and/or holiday period, [...] with pedagogical support”. Nevertheless, ETUCE underlines that this is not feasible without further public investment and effective measures to counter **the serious shortage of teachers and education personnel** affecting education systems across Europe.

5. Provide adequate initial and continuous professional development to teachers and education personnel

The proposal for a Council Recommendation on blended learning should support the clear recognition of **the right of teachers to receive up-to-date and accessible initial and continuous professional development** through social dialogue and collective bargaining at national, regional, and local level with meaningful involvement of education trade unions. ETUCE underlines the importance to ensure that teachers have the right to quality and accessible continuous professional development courses within their working hours.

As regards **massive open online courses (MOOCs)** mentioned in the proposal among the measures to support professional development opportunities for education staff, **ETUCE reminds that massive online training does not ensure adequate interaction and good pedagogy**. Therefore, ETUCE calls on the European Commission to provide more diverse training support for teachers, trainers, school leaders and teacher educators on blended learning in the School Education Gateway platform leading to certification. The technical resources and materials developed with the support of the European Commission to be employed in blended learning need to be reliable, easy to use, translated to all official languages of the EU and unanimously accepted by all stakeholders of the learning process.

ETUCE requests that the European Teacher Academies projects shall also be asked to develop joint accredited teacher training programmes on improving pedagogy on blended learning.

In addition, **self-assessment tools** mentioned in the proposal, such as the newly launched **SELFIE tool for teachers**, have the potential to support the implementation of blended learning. However, ETUCE draws attention to the risk that these tools may create benchmarking among education institutions with the view to set up school rankings, leagues, or competitions. It is important that the blended learning respect the specificities of all education institutions and priorities as regards ICTs, which should count with the agreement of teachers, trainers, and school leaders.

ETUCE is further concerned that the use of these tools will reduce education employers' responsibility to provide education personnel with quality and accessible continuous professional development.

6. Ensure that blended learning does not hinder equal access to quality education, including education institutions, for all students without any distinction

ETUCE reminds that **quality education is a fundamental human right** enshrined in the [European Pillar of Social Rights](#), [Sustainable Development Goal 4](#), [the Universal Declaration of Human Rights](#), and [the European Convention on Human Rights](#). In this respect, it is essential to provide adequate public investment and support to teachers to ensure that blended learning is implemented within face-to-face educational programmes in a way that ensures equal access to education institutions and high-quality education for all students regardless their socio-economic background. In particular, ETUCE does not agree with the European Commission's proposal presenting blended learning as "an opportunity to improve the quality, relevance and inclusiveness of education and training, such as better learning provision in rural and remote areas, including the outermost regions and island communities, and for other learners who may not attend the school site full time". In this regard, education trade unions point out the existence of increasing attempts by education authorities to face the shortage of teachers in rural areas by replacing in-presence teaching with online teaching performed by teachers connected from urban areas. This causes the elimination of face-to-face teaching and, consequently, to the closure of education institutions in rural areas. Ultimately, this leads to a serious deterioration of the quality of education. ETUCE strongly opposes this practice and underlines that it feeds into detrimental increasing national policies of savings and operating budget cuts to education that are of utmost danger to the human right and public good of education.

7. Protect the health and safety of teachers and education personnel in blended teaching environments

The proposed Council Recommendation mentions the importance of “prioritising the physical and mental well-being of learners and their families” as well as “boosting the development of digital competences of learners and families”. In this respect, ETUCE points out the importance of **extending the scope of ensuring the well-being and improving digital competences to the entire education system, including, in particular, teachers, trainers, and school leaders**. It is essential that the proposed Recommendation also specifies that the use of blending school sites and blending learning tools entails numerous challenges to the health and safety of teachers and students. Indeed, especially when blended learning entails the use of digital tools and is not supported by adequate training, financial support, and education support personnel, it easily translates into increased workload and overtime. This leads to increased psychosocial risks, unbalanced allocation between working and private time, increased risk of violence, including cyber-harassment, and new emerging challenges related to intellectual property rights and data privacy. As the definition of blended learning provided by the Commission also includes the possibility to carry out formal education activities in “physical environments away from the school site (distance learning)”, ETUCE recalls that in the case of activities taking place outside of the education institutions, the **health and safety of the students and teachers**, need to be ensured. ETUCE further emphasises that long-time distance learning, as it happened during the COVID-19 crisis, has a negative impact on the mental and physical well-being of the students and teachers as well as on students’ learning outcomes.

8. Effectively address the challenges related to increasing trends of privatisation and influence of the EdTech sector in education

While education systems have been experiencing **growing attempts of privatisation**, blended learning should be implemented within education programmes in a way that **protects the accountability and transparency in the governance of public education systems from the influence of private and commercial interests and actors**.

ETUCE points out that the **proliferation of private education providers** and the expansion of the **EdTech sector** will be increasingly favoured by the implementation of blended learning within education programmes. In this regard, it is essential that the Member States develop national regulations, including setting up public platforms for online teaching and learning to protect the public value of education. In addition, public platforms should be implemented in meaningful consultation with education trade unions and education stakeholders in full respect of professional autonomy of teachers and education personnel as well as academic freedom and autonomy of education institutions. Public platform should further avoid creating pressure on teachers and education personnel regarding the education material and pedagogical methods they use.

The growing use of digitalisation connected to the implementation of blended learning is increasingly endangering **data safety of the students and teachers, as well as the intellectual property rights of the teachers**. Therefore, ETUCE calls on the European Commission and the Member States to provide sustainable public funding and put in place an adequate legal framework in consultation with education trade unions to ensure data protection and intellectual property rights in education.

9. Ensure the implementation of the European Pillar of Social Rights

ETUCE welcomes that the proposed Recommendation mentions the European Pillar of Social Rights. Referring in particular the **Principle 1** “Everyone has the right to quality and inclusive education, training, and life-long learning [...]” and **Principle 11** “[...] Children from disadvantaged backgrounds have the right to specific measures to enhance equal opportunities.”. ETUCE emphasises that it is **essential that the implementation of this Recommendation will be closely tied with the implementation of the European Pillar of Social Rights Action Plan as well as other important EU initiatives**. These include the European Education Area; the Digital Education Action Plan 2021-2027; the Council Resolution on a strategic framework for European cooperation in education and training towards the European Education Area and beyond (2021-2030); and the Council Conclusions on equity and inclusion in education and training in order to promote educational success for all.

10. Ensure adequate public investment at regional, national and European level for quality and inclusive education

ETUCE emphasises that to ensure quality and inclusive education it is essential to provide increased **sustainable public investment in education**. In this context, ETUCE welcomes the Commission’s proposal of “implementing investments and reforms foreseen in national and Recovery and Resilience Facility plans to ensure that all learners can access the necessary equipment and learning opportunities.”. Besides, supporting access to quality online learning programs is essential for any learners. As regards the VET sector, ETUCE underlines that increased public investment is needed especially to ensure high-quality distance learning for the VET students and ensure their access to tools and simulators which helps them with independent practical learning in a safe environment. ETUCE calls on the European Commission to create further synergies with the European Semester and other EU programmes, e.g., Erasmus+, and ESF+, to provide public funding to support the implementation of blended learning.

**The European Trade Union Committee for Education (ETUCE) represents 127 Education Trade Unions and 11 million teachers in 51 countries of Europe. ETUCE is a Social Partner in education at the EU level and a European Trade Union Federation within ETUC, the European Trade Union Confederation. ETUCE is the European Region of Education International, the global federation of education trade unions.*