



Education International  
Internationale de l'Éducation  
Internacional de la Educación

<http://www.ei-ie.org>

# ETUCE

## European Trade Union Committee for Education EI European Region

Brussels, 18 March 2016  
MR/sf/9798

### EUROPEAN REGION- ETUCE

#### President

Christine BLOWER

#### Vice-Presidents

Odile CORDELIER  
Walter DRESSCHER  
Paula ENGWALL  
Andreas KELLER  
Galina MERKULOVA  
Branimir STRUKELJ



5, Bd du Roi Albert II, 9th  
1210 Brussels, Belgium  
Tel +32 2 224 06 91/92  
Fax +32 2 224 06 94  
[secretariat@csee-etuice.org](mailto:secretariat@csee-etuice.org)  
<http://www.csee-etuice.org>

#### European Director

Martin RØMER

#### Treasurer

Mike JENNINGS

### ETUCE Reply to the Public Consultation of the European Commission on the Review of the European Disability Strategy

ETUCE Transparency Register Number: **72197913011-06**

In response to the public consultation of the European Commission on the review of the European Disability Strategy, the European Teacher Union Committee for Education (ETUCE) wishes to express its point of view to the European Commission. ETUCE represents 131 teacher unions and 11 million teachers in 48 countries of Europe at all levels of education ((pre-) primary, secondary education, vocational education and training, higher education and research). ETUCE is a Social Partner in education at 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 teacher unions.

ETUCE welcomes the initiative of the European Commission to mid-term review the European Disability Strategy and wishes to contribute the point of view of teacher unions as social partners in the education sector. Indeed, we agree with the importance that the Strategy gives to education and training by identifying education and training as one of the eight main areas of action to eliminate barriers that hinder people with disabilities to enjoy the full rights as European citizens. We are however dissatisfied that the strategy focuses exclusively on the integration of disabled adults into society and refers solely to the need for member organisations to develop policies to help disabled adults enter into the labour market, substantially neglecting the specific needs of children and young people with disabilities.

Regarding the areas of Action, we wish to bring the following to the European Commission's attention:

#### Accessibility

We criticise the single-angled correlation made in the document between the "strong business case" with a view to "improve the functioning of the internal market", and free of charge provision of public services and products. In opposition to the argument in the document, that standardisation and other legislative instruments are optimising the accessibility of the build environment, transport and ICT, ETUCE clearly denounces the false impression given here that "smarter regulation principles" can lead to "merits of adopting regulatory measures to ensure accessibility of products and services". ETUCE has clearly shown in its previous statements on *Opening Up Education*, the *European Semester* and *TTIP* that REFIT does not encourage the incorporation of accessibility and "design for all" in educational curricula and training for relevant professions. On the contrary, by seeking to simplify and undo existing legislation in particular in the area of social and

employment legislation, REFIT endangers equal accessibility for all to common goods such as education, health and other sectors that are relevant in addressing the needs of people with disabilities.

#### Education and training

We are disappointed to see that the European Commission only addresses issues regarding people aged 16 and above. The strategy neglects to mention the need of granting disabled children/students the right to attend ordinary schools, to have access to specialised teachers and other education staff who are trained and able to respond to their specific needs and to give access to children with special needs to ad-hoc tools and programmes. Furthermore, the document lacks reference to the need to help the families of disabled students and to the important role that parents and the families of disabled students and young people have in taking care of their education and in pushing school authorities to set up learning environments favourable to enhance the learning process of special needs students.

Indeed, the strategy lacks in general reference to adequate measures in favour of the families who take care of disabled persons. In this context, it is essential to highlight that the cooperation with the Fundamental Rights Agency for supporting the European Commission in collecting relevant data, statistics and monitoring as mentioned in the instruments for implementing the strategy, has led to a focus on measuring the integration of children with disabilities in society through the Fundamental Rights Agency.

#### Teacher unions in social dialogue

We suggest that the European Commission's initiative should pay more attention on the importance of social dialogue. While effective social dialogue remains crucial for developing successful educational reforms, teacher unions continue experience and report that they are not being consulted on key education reforms linked to the implementation of ET2020 goals. We ask the European Commission to suggest to governments and education authorities to enhance social dialogue with the unions of professionals of the education sector on how to improve education and training in general, including the integration of children and students with special needs in education.