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European Trade Union Committee for Education EI European Region

To: Mrs Niki Kerameos

Minister of Education of the Hellenic Republic

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E-mail: interolme@yahoo.gr

Brussels, 25 May 2020

Ref.: SF/vd/10159

Subject: Solidarity with ETUCE member organisations in Greece

Dear Minister,

The European Trade Union Committee for Education (ETUCE) represents 132 education trade unions i.e. 11 million teachers in Europe. As a recognised Social Partner in education at EU level, ETUCE meets at regular intervals with the European Federation of Education Employers (EFEE) in the frame of the European Sectoral Social Dialogue Committee for Education to negotiate and discuss education and employment topics relevant to teachers, academics and other education personnel in education. ETUCE is a European Trade Union Federation within ETUC, the European Trade Union Confederation. ETUCE is also the European Region of Education International (EI), the global federation of education trade unions.

Further to the letter ETUCE sent to you on 30 April 2020 reminding the Greek Government to constructively work together with education trade unions especially in these unprecedented times, we were astonished to learn that the provision/regulation on the live streaming delivery of lessons was adopted by the Greek Parliament with an amendment/addition attached to another Bill without prior warning and without any consultation nor dialogue with the education trade unions on 8 May 2020.

Understanding that the step was taken as an emergency measure to the exceptional circumstances and is limited to last until the end of the academic year 2019-2020, we would like to highlight that the exclusion of education trade unions from all stages of the discussions on this regulation defies the Article 21 b) of [the European Social Charter](#) that was ratified by Greece on 18 March 2016 and the provision on the right to information and consultation where it is stressed that [...] “workers or their representatives, in accordance with national legislation and practice: b) to be consulted in good time on proposed decisions which could substantially affect the interests of workers, particularly on those decisions which could have an important impact on the employment situation in the undertaking” [...]

Further to this, the adoption of the regulation and its amendments/addition explicitly shows the neglect of the principle 8 on “Social dialogue and involvement of workers” of the [European Pillar of Social Rights](#) which states that [...] “Workers or their representatives have the right to be informed and consulted in good time on matters relevant to them, in

particular on the transfer, restructuring and merger of undertakings and on collective redundancies"[...] along with the principle 10 on "Healthy, safe and well-adapted work environment and data protection".

Synchronous distance learning, including its recording, raises important difficulties for teaching personnel, regarding employment and working conditions on the one hand, and professional issues on the other and, thus, involvement, and consultation of education trade unions is central to the elaboration of the synchronous distance learning measure as regards:

- **Protection of copyrighted content:** The online dissemination of lessons entails the circulation, online, of content prepared by individual teaching professionals, for the sole benefit of their students, and raises the question of the ownership of this content, as well as its destination.
- **Personal data protection, and online privacy and safety:** Synchronous distance learning implies that teaching staff are to share video records of their person, thus exposing themselves to potential online scrutiny. This in turn raises questions regarding the protection and prevention from online harassment and third-party violence with grave consequences for their online privacy, safety, and psycho-social well-being.
- **Professional agency:** At all times, and in particular in the midst of the COVID-19 crisis and emergency teaching measures, teaching professionals must be allowed to determine the appropriate teaching methods and pedagogy, as they consider them best and appropriate to reach and support the students with a view to best respond to the students' individual needs, and to ensure the best educational outcomes.

Whilst urging you to comply with the art. 35 of [the General Data Protection Regulation \(EU\) 2016/679](#) concerning the obligation to carry out a data protection impact assessment, once again, ETUCE calls on you to comply with the [ILO standards](#) stating that a climate of trust, built through social dialogue and tripartism, will be essential in the effective implementation of measures to address the COVID-19 outbreak and its consequences.

When a type of processing in particular using new technologies poses a high risk to the rights and freedoms of natural persons, it is essential to meaningfully involve national social partners in view to ensure this impact assessment includes the views of education practitioners.

Yours Sincerely,



Susan Flocken
European Director