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| KARLSRUHE | LUXEMBOURG MOL MÜNCHEN VARESE |
| <i>- THE ASSOCIATION OF THE PARENTS' ASSOCIATIONS OF THE EUROPEAN SCHOOLS -</i> | |

29 February 2008

Comments on the Annual Report of the Secretary-General to the Board of Governors of the European Schools

Ref: 112-D-2007-1

Interparents wishes to congratulate the Secretary-General for the improvements that have been made to the Annual Report. We would however request again that the Secretary-General takes this opportunity not only to list the problems currently faced by the European Schools system but also to analyse their causes and recommend solutions. This would increase the practical usefulness of this management tool.

1. School population and accommodation problems

1.1 Brussels

Interparents acknowledges with thanks the efforts that are currently being made by the four schools, many individual parents and their Parents' Associations to accommodate to the continuing critical situation in the Brussels schools, that is in general not of their making and beyond their control. The costs and other constraints imposed by the present situation on the Parents' Associations' responsibilities are considerable. It is essential that the Board of Governors, the Host Country, the Secretary-General and the Commission consistently apply good management and foresight in this extraordinary situation, which should never have been allowed to materialise in the first place. Interparents would wish to draw attention again to the letter of the four Brussels Parents' Associations to the Board of Governors, dated 18 October, 2007.

Interparents requests that appropriate actions be taken to ensure the growth of the school of Berkendael. This might require launching immediately a marketing campaign to demonstrate the positive aspects of this school. We also wish to see a rapid and positive

evolution of the Laeken dossier because the temporary Berkendael site will only help to cover global needs for the next two years.

Concerning the overpopulation that the other Brussels schools have had to confront for several years, solutions should be adopted in view of the particular situation of each school, its demography and the trends of its population. The Parents' Associations have put forward several practical suggestions.

Finally, it is of utmost importance to achieve a formal decision on the location and the building of the fifth school in Brussels as soon as possible, given the very considerable delays that have been experienced in each case during the past thirty five years, between taking the decision to build a school in and it becoming effectively available for use.

1.2 Luxembourg

The situation in Luxembourg is also causing considerable concern to the parents because overcrowding at the Luxembourg I site has become intolerable. The whole of the Luxembourg II primary school is accommodated in prefabricated buildings some of which are more than twelve years old. Whereas pre-fabs are not expected to last more than eight years, these will apparently be used for another four years. It should be recalled that moving the fifth primary class into the so-called Village Pédagogique (in fact, the prefabs) against the advice of the Parents' Association and the teachers has caused severe problems (e.g. severe overcrowding of the canteen). Indeed, some children will finally spend their entire primary school life in pre-fabs.

Meanwhile, there is no secondary cycle yet in the Luxembourg II school, and no agreement on how it should be created.

The data about Luxembourg, with an apparently reasonable growth in the number of pupils should be read bearing in mind that in fact there has been an unwelcome freeze on the admission of Category 2 and Category 3 pupils, representing a real missed opportunity in Luxembourg, where there are few alternatives for non-Francophone/non-Germanophone children, or they are prohibitively expensive such as private Anglophone schools.

1.3 Varese, Frankfurt and München

The accommodation problems of the schools are still waiting to be resolved. The Board of Governors must not lose sight of the accommodation situation in all the schools, just because of the overwhelmingly critical situations in Brussels and Luxembourg.

2. Teaching Staff

Interparents profoundly deplores the fact that each year a number of posts for detached teachers remain unfilled. Interparents takes due note of the fact that this appears to be a consequence of the disagreement among the Member States and the European Commission regarding cost-sharing. Meanwhile, however, it is absolutely unacceptable that the education of children is effectively held hostage to a political and bureaucratic dispute that is not of their making, nor of their parents, nor of their schools.

In this context, Interparents confirms, that the enrolment of teachers' children in the Brussels schools deserves careful consideration. Indeed, the available time for education of our children, each week and each term, is already unduly curtailed. We do not want teachers to risk cutting short their availability at the beginning and end of each school day, just because they have to get across the city in the rush hour to attend to their children's logistics. The current rule of the Brussels Central Enrolment Authority in this respect should be considered in the light of the above.

3. Contributions to the European Schools' budgets

Interparents is fully aware of the on-going negotiation on cost-sharing in the European School system. We recognise that the financial framework must be fair, viable and transparent. However, Interparents asks the member states and the European Commission to address this matter in a proportionate and dispassionate manner. As pointed out above, it would be wrong to prejudice the education of children already in the system during the course of a budgetary negotiation.

In this context we also regret that the Annual Report does not specify the cost of buildings and their maintenance provided by host countries. That would be necessary and desirable if the report were to provide a complete picture of the contributions of the member states to the European Schools.

Interparents does not support the current exclusive emphasis on Category 1 students in the schools and particularly in Brussels, Luxemburg, Frankfurt and München. We regard this as an arbitrary imposition inconsistent with the Convention that has been hampering, over a long period, the natural growth of the European Schools system.

For social and educational reasons it is thoroughly desirable that children of different backgrounds be educated together, which indeed used to be the normal practice in the European Schools, with – at the time – the support of the European Communities.

Furthermore, we would point out that the current restrictions against Category 3 and Category 2 families is not compatible with the declared objective of the Reform, that is to open the European School system more widely to the European population at large.

Thus, Interparents would also have expected the report to include a more thorough differentiation between the contributions to the schools under Article 29 of the Convention (Category 2 contracts) and the Category 3 school fees. In particular, the proposal to set the price for a Category 2 contract on the basis of the average cost of a pupil in the system must now be seriously discussed. Interparents recalls that this was proposed to the Board of Governors by several stakeholders in the Gaignage-reports on four schools in 2004 and in reports from outside agencies, e.g. the Van Dijk report commissioned by the Commission.

Another element that might be considered in the current discussion on cost-sharing would be the relation, in 2007, between the Category 1 pupil population of nearly 69% compared to an expected contribution from the European Communities of less than 55%.

4. Choices of languages

In Secondary years 6 and 7, pupils can choose other languages than German, French or English, as LII. The Annual Report should contain statistics about these choices for all schools. This would also be useful with view to the ongoing discussion about vehicular languages and the eventual introduction of the host country language as an optional LII. The Rapports de Rentrée of the individual schools do contain this information and it would not be difficult to consolidate this information on a comparative basis across the schools.

5. Repeat rates

Repeat rates are an important objective indicator of the overall efficiency of an educational system. Higher repeat rates impose additional costs on the system as a whole, since pupils have to stay longer in the school before they graduate. Disparities in repeat rates between schools and language sections would normally indicate differing levels of achievement. Systematic disparities in the levels of marks as those observed in the European schools are indicators for differences in assessment and marking that affect the right of the pupils to equal treatment within the system.

In this context, Interparents is particularly concerned about the repeat rates reported for the Francophone language sections. For many years, the Annual Report of the Secretary-General and the reports on the European Baccalaureate confirm the same disturbing tendency: subjects taught in French language are very obviously assessed and marked differently from the same subjects taught in other languages. This seems to occur despite the fact that the definition of marks is the same for all subjects and all languages (see General Rules article 60). These differences in assessment and marking affect not only pupils in the Francophone sections but all pupils taking subjects in French language, e.g. LII, history and geography, economics, LIII, LIV.

The disadvantages these pupils encounter, compared to their peers not taking subjects in the French language, when applying for further education in an increasingly competitive environment cannot be explained or justified by cultural differences.

Interparents welcomes the harmonisation of assessment and marking as attempted currently by the responsible Inspectors for the baccalaureate exams in LII. We urge the Boards of Inspectors to undertake without further delay all necessary steps to assure harmonised assessment and marking at all levels of the education in the European Schools. Indeed, the whole school career of pupils is affected by these chronic differences.

6. Central Enrolment Authority

The Central Enrolment Authority has been created to design and implement the enrolment policy for the Brussels schools, to monitor population and to report to the Board of Governors. Interparents wishes that these important roles be maintained, as decided by the Board of Governors when setting up the CEA.

The creation of a Central Enrolment Authority would also be welcome for Luxembourg as well, in order to enhance transparency with respect to the allocation of a child to Luxembourg I or Luxembourg II administrative unit, and to outline how appeals by parents are dealt with. In practice, the split by residence for EN/FR/DE pupils is known not to be applied consistently (classes reaching 30 are not split but pupils are sent to the other administrative unit instead).

7. Transparency

The parents welcome the Secretary-General's commitment to transparency as approved by the Board of Governors in Parma (2000-D-264-2):

"There will be systematic public access to data concerning the European Schools, with the exception of individual personal data or information judged confidential by the Director, either by publication on a website or by direct transmission on request."

Interparents expects the Board of Governors to take this policy fully on board and act accordingly in all respects. For instance, the Annual Report still affirms that Interparents is excluded from access to documents for a number of working groups and of the Boards of Inspectors, which is not consistent with the agreed policy as stated above, and should be changed.

All Interparents' delegates to the European School system as a whole are informed that the policy approved at Parma applies throughout their work. In the unlikely event that exceptional restrictions have to be applied to a particular document, the Secretary-General is invited to so inform the President of Interparents, together with the document concerned.

6. Complaints Board

Interparents would wish to see included under this point the reasons why appeals have been declared not receivable due to lack of provision in the General Rules. As an example, we wish to mention the collective appeal of a large number of Luxemburg parents against the vertical split of the Luxemburg schools.

The fact that so many parents on one particular site strongly disagree with the decisions taken by the Board of Governors and the ad hoc Steering Group, as well as by the local school Directors, shows a very worrying lack of trust in the school institutions and therefore deserves to be thoroughly analysed.
