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‘ACCREDITED EUROPEAN SCHOOLS’ WORKING GROUP
REPORT

Board of Governors of the European Schools

Meeting on 17-19 April 2018 – Tallinn (Estonia)

**INTRODUCTION**

More than ten years after the accreditation of the first two schools, the Board of Governors agreed on the need to clarify the terms and the conditions for accreditation.

A mandate was given to a Working Group to study:

* Access to data
* Format of official school reports
* Monitoring of compliance with requirements
* Conditions for accreditation (number of sections, organisation of studies, teachers’ qualifications, etc.)
* Composition of the audit team and aspects to be covered by the audit
* Procedure for initial accreditation
* Procedure for renewal of accreditation
* Rules for termination of accreditation
* Cost neutrality of Accredited European Schools (audits, administrative work at the Office, etc.)
* Services that might be made available to Accredited Schools and their cost
* Possibility of accrediting schools outside EU territory.

An interim report was presented to the Board of Governors at its December 2017 meeting.

The working group has met six times so far and is presenting a second report to the Board of Governors at its April 2018 meeting.

**FOLLOW UP ON THE DIFFERENT MANDATES**

* **Access to data, monitoring of compliance with requirements and format of official school reports**

These three points may be closely linked.

In the current version of the agreements, there is no obligation on accredited schools to make some relevant data available.

As a result, the Secretary-General is obliged to request those data from the schools.

Some schools respond promptly, others less so. In any event, the Secretary-General has to rely on the data provided.

A better solution might be to impose use of a common school management system. Such a solution would allow accredited schools to produce standard reports and the Secretary-General to obtain direct access to the relevant data, as is the case for ‘traditional’ European Schools.

Improved access to data would facilitate ‘monitoring of compliance with requirements’ and potentially simplify audits. Many checks might be made remotely, before the audit visit, as will be better illustrated in the ‘audits’ section.

As for data to be made available to Accredited European Schools (AES), many documents are published on the website eursc.eu; representatives on the JTC have access to all documents for the meetings and can share these documents with the people whom they represent through protected platforms (publication on open websites is precluded). Regarding other documents that are useful to AES, a proposal was supposed to be formulated by the AES Directors, but is not yet available.

* **Conditions for accreditation (number of sections, organisation of studies, qualifications of teachers, etc.)**

In the case of the number of sections, the Regulations are rather vague and almost contradictory.

The Convention states (Art. 4, points 2 & 3) that a European School *comprises several sections*. Two sections seem to be a minimum.

When a derogation from the rule of a minimum of two sections is requested by the School, this should be mentioned in the Dossier of Conformity and be approved by the Board of Inspectors and the Board of Governors; the concept of equivalence is drawn on to underpin the rule of a minimum of two languages offered in the school (to be rephrased in the Regulations).

The Working Group recommends clarifying the terms. When a derogation from the rule of a minimum of two sections is requested by the School, this should be explicitly mentioned in the Dossier of Conformity and the Secretary-General should draw the Boards’ attention to this fact.

When the size of the school is limited and if there is to be only one section, tuition in L1 for ‘Students Without a Language Section’ (SWALS) should be provided (AES seem to be already practising this when a minimum of three to four pupils so request), in addition to providing exposure to a vehicular language as L2. A minimum threshold of pupils for the teaching of L1 to SWALS should then be mentioned in the Regulations.

The Regulations allow accredited schools a degree of flexibility for the organisation of studies up to secondary year 5.

The Working Group would recommend defining minimum common requirements, so as not to jeopardise year-by-year equivalence.

The Working Group is minded to recommend that teachers’ qualifications should be the same as required in the European Schools, so as not to put the quality of the education delivered at risk and, ultimately, the reputation of the European Baccalaureate Diploma.

* **Composition of the audit team and aspects to be covered by the audit**

*Composition and organisation of the audit team*

The number of audits to be carried out has steadily increased over the last few years and the Presidency and the Secretary-General face increasing difficulty in finding volunteer inspectors to conduct the audits.

The audit visits need to be better regulated and it would be a good idea to take account of each school’s specific profile. Flexible three-year audit cycles (or longer) would be supported by and based on desk research and documentation, allowing a ‘hard’ and ‘soft’ approach. This approach would influence the length and the scope of the visit. Audits would need to be planned as far in advance as possible.

In parallel with what has been proposed for the evaluation of locally recruited teachers, the possibility of involving external experts with extensive experience in the European School System (former Directors or Deputies with experience in ‘traditional’ European Schools) in the audit teams has been raised.

In general, since the audits and their content draw on Whole School Inspection (WSI) practice, the involvement of Directors, who are now well practised in WSI, would be recommended. Given that Directors currently in post might prove not to be available because of time constraints, the idea of involving former Directors has been mooted.

It would be better for audit teams to be composed of inspectors and ‘experts’, the latter’s responsibility being to prepare the work for the inspectors and to provide them with support. Inspectors would visit the school with/without the ‘experts’.

Experience of Whole School Inspection would be considered to be a good background for conducting audits of AES. The inspectors’ essential role would be to check the quality assurance part of the audit, while the ‘experts’ would look more closely at the other two parts. Newly appointed inspectors would join the teams at the ES System’s expense as observers and learn about good practices (a form of training).

Preparatory work – before the inspectors’ visit – could be done by ‘experts’. This procedure would allow more time be allocated to the quality assurance part and inspectors would be able to focus better on relevant local information. Rules should be adapted and resources would need to be made available.

Experts (Directors, Deputy Directors with experience in ‘traditional’ European Schools), trained in the Regulations on AES and the development of the ES System, would join the team to check the school’s conformity with the Regulations and with the Dossier of Conformity. They would also support the inspectors’ audit work and guarantee standards, in order to avoid putting the ES at risk of awarding accreditation to schools which do not meet these standards and jeopardising our schools’ reputation.

Objective evaluative tools should be produced and would be used by inspectors to check conformity. Two different templates would be used in order to better differentiate the criteria and indicators for the European Baccalaureate cycle from the rest.

The audit template should have a clearer fact sheet (data on pupils, teachers, language teaching, choices and optional subject available, etc.).

The Assistant for the AES could make available data gathered from AES. Following that preparatory work, an ‘expert’, paid on a consultancy basis, would report remotely to the team of inspectors. Inspectors would remain responsible for the audit process and the audit report. A pool of experts would be available for audits in the same way as they are available for the Baccalaureate cycle; this procedure would be instrumental in ensuring continuity.

Benchmarking of AES against ES (such as EB results, portfolios, repeat rates, absence reports, etc.) could be considered.

It would be positive to nominate an experienced audit coordinator in each audit team (as happens in the WSI teams). The Presidency would nominate this coordinating inspector according to his/her experience/qualifications and if he/she agrees. One Nursery/Primary inspector, one Secondary inspector and one expert would be the minimum required when both cycles are to be audited. During the first audit of the final two years, the Head of the Baccalaureate Unit would be present in order to better advise the school starting the Baccalaureate cycle.

The definition of the process and the structure of the audit – as proposed here – should be clearly laid down in the Regulations.

All costs would need to be regarded as included in the overall contribution paid by the Accredited Schools to the ES System, this contribution being under discussion. This would be in line with the idea of cost neutrality for the System.

*Aspects to be covered*

The focus on the goals of the audit and the meaning of the accreditation renewal should be:

1) checking conformity with the AES and ES Regulations,

2) checking conformity with the Dossier of Conformity

3) quality assurance.

The Group agrees on the need to check the quality of teaching, even though how this should be done – and the extra resources required – still has to be determined. Inspectors are overloaded, but AES contributions can be used for the purpose of ensuring this quality of teaching throughout the entire system.

The granting/renewal of accreditation would remain the priority of the audit, although maintaining high-quality education should constantly be the aim.

These three audit objectives should be mentioned explicitly in the Regulations.

As for the content to be covered, the Working Group recommends widening the scope to cover checking of compliance with regulations (pupils’ curricula, courses offered, teachers’ qualifications, etc.).

That should be case to an even greater extent for audits covering the final two secondary years, leading to award of the European Baccalaureate Diploma.

The audit reports should draw the Board of Governors’ attention to areas where compliance with the minimum requirements may not have been found.

Specific templates should be produced for the scope and a sub-group composed of two Inspectors and a Director has been created.

It would be beneficial for ES inspectors and national inspectors to be able to exchange the results of their school inspections. The accredited school might be requested to provide the ES inspectors with the national inspector’s report, when available, before the audit is conducted.

AES are national schools and subject to national inspections. They should share these reports, as well as in-service training plans, teachers’ absences and reports, recruitment time of teachers (turnover), with the inspectors in the context of their audits. The level of detail would depend on the structure of each school and would be at the inspectors’ discretion, with general guidelines provided.

* **Procedure for initial accreditation; procedure for renewal of accreditation**

There is a general consensus amongst the members of the Working Group that the general procedures (the workflow process to obtain accreditation) should not be changed.

As regards the Dossier of Conformity, use of a compulsory template – keeping its structure intact – should be made mandatory and any other document or item of information that the Delegations would like to be presented could be added as an Annex. This would facilitate reading and understanding of the document.

The Dossier of Conformity should include the following elements coming from the Regulations:

* *Clearly place the school in* the national school networks of the Member States requesting accreditation.
* *Commitment to offer* firstly, the same type of education as that provided in the European Schools and secondly, equality of opportunity for pupils in terms of preparation for the European Baccalaureate.
* The pedagogical equivalence, year group year group, of the education provided
* Language learning provision in terms of Languages 2, 3 and 4 complies with the Regulations in force in the European Schools. Exceptions should be highlighted.
* The school undertakes, for years 6 and 7 of the secondary cycle, to abide by the Regulations for the European Baccalaureate and by the Arrangements for implementing those Regulations and the other decisions of the Board of Governors concerning the European Baccalaureate.
* It offers a range of options, particularly in secondary years 6 and 7, which is conducive to pupils’ subsequent admission to courses in higher education.
* Teachers must be qualified to teach their subjects in one of the EU Member State languages, and they must, in principle, have language competences similar to those of native speakers (near native speakers) in their language of tuition.
* Indicate the support system for special needs pupils, within the meaning of the legislation of the country in which the Accredited European School is located.
* The existence of ethics and religion courses, which may be replaced by teaching about religions and civics.
* Compliance with a minimum and maximum length per teaching period.
* In secondary years 6 and 7, the School follows exclusively the curriculum and the structure of studies specific to the European School system.

The Dossier of Conformity should be the subject of in-depth examination and discussion by the pedagogical committees, even though it is a time-consuming exercise and deserves further reflection.

Instead, practice with respect to the procedures should be improved, along the lines of the very recent practice put in place.

The original decision of the Board of Governors provides for the signing of two separate agreements:

* One for the years up to secondary 5,
* A separate one for the final two secondary years, leading to award of the European Baccalaureate Diploma.

In fact, this led in the past to multiplication of the number of audits and agreements signed.

Some practical arrangements would help to reduce the number of audits considerably, without impacting on their quality:

1. As a general rule, the initial agreement should be signed for all levels up to secondary 5, as foreseen in the decision of the Board of Governors, irrespective of the levels already opened in the school. The composition of the audit teams should be arranged accordingly. A clear timetable for gradual coverage of the different levels over years should be included in the Dossier of Conformity.
2. As a general rule, the timing for the audit of the final two secondary years should be planned in such a way that the new agreement for the final two secondary years would be signed at the same time as renewal for the other years.
In that way, both agreements would then expire after three years and the audit for their renewal could cover both.

Harmonisation between the agreements will be sought, so that a single audit will allow renewal for all cycles at once.

The number of members of the audit teams should be arranged accordingly (e.g. two Nursery and Primary inspectors for the initial signing of an agreement for a school starting with only Nursery and Primary levels; two Nursery and Primary members and three Secondary members for the initial signing or renewal of agreements covering all levels).

* **Rules for termination of accreditation**

There is a general consensus amongst the members of the Working Group that clearer criteria and a clearer procedure for termination of accreditation should be defined and the Regulations changed accordingly.

A school which is unable to comply with Art. 20 of the Regulations (now Point 22 as amended?) should be phased out. However, point c. of that article seems to be expressed in broad brush terms[[1]](#footnote-1) . “Clear infringement” should be more precisely defined.

* **Cost neutrality of Accredited European Schools (audits, administrative work at the Office, etc.)**

It should be noted that back in 2004, the Troika II Working Group mentioned in their report (ref.: 2004-D-532) that the opening up of the European Baccalaureate to pupils in one or more schools other than the European Schools would have organisational and financial consequences (see Annex 3 to that report, appended hereto). It should also be noted that the Working Group’s reflections focused mainly on the organisation of the European Baccalaureate and did not give sufficient attention to all the other aspects.

In 2010, the then Secretary-General presented a first report on the opening up of the System, after only five years’ experience (ref.: 2010-D-329). The question of whether or not it was really possible to continue maintaining the service offered to the Accredited European Schools within the limits of the resources available to the System was already mooted, as was the question of whether a financial contribution should not be requested to pay for the services that these schools received from the System (page 10 of the aforementioned document, appended hereto).

Since then no further reports have been produced and the number of Accredited European Schools has constantly risen and has seen unprecedented steep growth since an oral report on the situation was presented to the Board of Governors at its December 2016 meeting, arousing a great deal of interest amongst a number of delegates and leading to the mandate given to the working group.

***Rationale***

Extract from the AES Regulations:

***“Article 17***

*All the costs entailed by accreditation and its effects, without reservation or exception, shall be borne solely by the Accredited European School.*

*Those costs shall correspond to:*

*a. the travel and subsistence expenses of the inspectors sent by the European Schools. They will be defrayed on the basis of a mission order and under the same conditions as when inspectors carry out a mission on behalf of the European Schools;*

*b. the expenditure incurred by staff of Accredited European Schools in attending the in-service training courses – referred to in Article 16 – organised by the European Schools;*

*c. The teaching materials referred to in Article 16.*

*The costs of purchasing and dispatching the teaching material referred to above will be refunded to the European Schools by the Accredited European School in accordance with the scales set by the budget of the European Schools, on submission of an expense claim.”*

In the Working Group it was agreed that the sentence *“Those costs shall correspond to:”* does not realistically reflect the scope of the costs.

***Proposed method for calculation of costs generated by AES***

The Board of Governors recently decided to create a post of Assistant at the Office, paid for on a pro rata basis by the AES (70% of the workload is considered ‘general’, for all pupils, and 30% linked to pupils in S6-S7). The cost will be different for each school, according to their population, and updated every year.

The Working Group agreed that this can be regarded as merely a first step in the direction of real cost neutrality.

In actual fact, a large proportion of the staff working at the Office of the Secretary-General also work for the AES.

Costs at the Office also include the rent for the premises and associated costs, the contribution of the Member States to the salaries of seconded staff, the pro rata share of the full-time equivalent of the people working for the AES at the Office, once the Units which are impacted by the existence of the AES are considered, etc.

Below is a scenario for calculation of these costs, which has been agreed upon amongst the members of the WG, with the exception of the Representative of the Directors of the AES. The Directors of the AES insist that only costs generated by AES should be considered. The feeling of the rest of the members is that the method proposed does indeed refer only to costs generated by AES.

A detailed illustration of the impact of the existence of a growing body of AES on each member of the staff working in the Office of the Secretary-General (OSG) has led to the conclusion that the workload of the equivalent of at least 50% of the staff working at the OSG is impacted by the existence of AES. This estimate is more likely to be prudent than exaggerated.

As a result, only 50% of the cost of the staff working at the Office will be considered.

As far as administrative costs are concerned:

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| --- | --- |
| Buildings | 1210000 |
| ICT | 1748500 |
| OSGES | 3603000 |
| Misc. | 289000 |

By analogy, only 50% of the costs associated with the premises (Building) would need to be considered. No costs for ICT for the time being, since only limited services are already offered. All costs for ‘OSGES’ and ‘Miscellaneous’ would need to be included.

All operational costs should also be included.

Thus, on the basis of the overall budget of €13903955, the figures would be as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| Staff |  | AES quota | Total |
| 6703455 | Cost salaries |  |
| 267750 | Contribution MS |  |  |
| 6971205 | Total | 0.5 | 3485603 |
| Admin |  |  |  |
| 6850500 |  |  |  |
| Buildings: rent, cleaning, heat, water, elec, install. | 1210000 | 0.5 | 605000 |
| ICT: hardware, software, training | 1748500 | 0 | 0 |
| OSGES: transl., interpr., consult, meetings | 3603000 | 1 | 3603000 |
| Misc: equip., comm., miss., maint., etc. | 289000 | 1 | 289000 |
| Pedag.: training courses | 350000 | 1 | 350000 |
| Total |  |  | 8332603 |

The costs to be shared therefore amount to €8332603. Thus, not all the costs of the OSG would be considered.

As for the possible formulas that could be used to share the costs, the preferred option is a breakdown partially proportional to the total number of schools (considering that some work has to be done ‘irrespective’, so to speak, of the number of pupils) and partially to the number of pupils. This formula was adopted by the Board of Governors in the case of the Munich School: ¼ of the cost shared in proportion to the number of schools; ¾ of the cost shared in proportion to the number of pupils (in the case of the Munich School it is, however, applied to the OSG’s whole budget).

Taking the figures for the populations in the AES this year:

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| School  | PA | DUN | MAN | STRA | HER  | HELS | D HAA | B VIL | TAL  | COP | BRI | ESUK  | DIF | TOT |
| Total pupils  | 680 | 33 | 129 | 989 | 258 | 275 | 1093 | 1484 | 201 | 270 | 426 | 832 | 492 | 7162 |

and the total population of the European Schools, namely 26993, the costs to be shared amongst all AES would amount to:

8332603\*1/4\*13/26+8332603\*3/4\*7162/(26877+7162)=2356496

This total of €2356496 should be apportioned amongst the AES, which would correspond to 17% of the budget of the OSG.

The preferred option is a breakdown partially (1/5) proportional to the total number of schools (considering that some work has to be done ‘irrespective’, so to speak, of the number of pupils), partially (2/5) to the total number of pupils and partially (2/5) to the pupils enrolled in the last two years.



Figures for pupils in years S6 and S7 are the ones received from the AES.

The calculations have been produced merely to provide a sample illustration of the proposed method for apportioning the costs. Different criteria could of course be followed, depending on the discussions and decisions of the Board of Governors.

Following the discussions engaged in by the Budgetary Committee, alternative methods of apportioning the costs have been added in the **annex** hereto.

***Implementation***

As regards a possible implementation process, bearing in mind that there is a three-year life cycle for the agreement, it would be possible to start applying the new charges gradually, so as to give the different Member States time to adapt to the new scenario.

A first scenario might use the first three years after a decision taken by the Board of Governors to amend the content of the agreements signed with all existing and future AES.

After those three years, there might be two further years of gradual implementation.

1. In the first three years after the decision of the Board of Governors, all updated agreements would be signed, but the present arrangement would still be in use.
2. In the fourth year 1/3 of the contribution would be requested.
3. In the fifth year 2/3 of the contribution would be requested.
4. From the sixth year onwards, the full contribution would be requested of all existing and future AES.

The contribution would need to be recalculated every year.

It should be made clear that from the fourth year onwards, payment of the contribution would lead to waiving of any other costs borne by AES: contribution for the Baccalaureate exams, reimbursement of inspectors’ mission expenses, etc. The rationale being that the contribution already covers those costs and would fully cover the extra work generated for the Office.

**PROPOSAL**

The Board of Governors is invited to:

1. express an opinion on this report from the ‘Accredited European Schools’ Working Group, so as to guide the future work
2. extend the mandate given to the Working Group, so as to complete the work along the lines indicated.

**ANNEX**

**Alternative apportionment of costs amongst AES**

(Partial follow-up on the Budgetary Committee discussions)

First scenario:

* 1/5 in proportion to the number of schools
* 2/5 in proportion to the overall population
* 2/5 in proportion to the number of pupils in years S6-7

Apportionment partially (1/5) proportional to the total number of schools (considering that some work has to be done ‘irrespective’, so to speak, of the number of pupils), partially (2/5) to the total number of pupils and partially (2/5) to the pupils enrolled in the last two years was the preferred option in the Working Group’s discussions:



Second scenario:

* 1/2 in proportion to the overall population
* 1/2 in proportion to the number of pupils in years S6-7

The idea of apportionment partially proportional (1/2) to the total number of pupils and partially (1/2) to the pupils enrolled in the last two years was mooted at the Budgetary Committee meeting, which would produce the following result:



This scenario decreases the differences in the cost per pupil across the different AES.

Third scenario:

* in proportion to the overall population

The idea of apportionment proportional to the total number of pupils was also mooted at the Budgetary Committee meeting, which would result in the same cost per pupil in all schools:



This scenario equalises the differences in the cost per pupil across the different AES. It should be noted that organisation of the European Baccalaureate involves work which has the heaviest impact on the Office’s staff. In that respect, whilst an equal cost per pupil across all AES might be welcome for some reasons, such an equal cost would not fairly reflect the different load that the different schools place on the work of the Office of the Secretary-General.

1. (“clear infringement of one or more of the conditions laid down in the Dossier of Conformity”) [↑](#footnote-ref-1)