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- THE ASSOCIATION OF THE PARENTS' ASSOCIATIONS OF THE EUROPEAN SCHOOLS -

MEMORANDUM

12 September 2008

Subject: The Reform of the European School system.

Summary:

The present Memorandum is for the attention of the European Schools Working Group on Reform. It is also addressed to the President and members of the Board of Governors and to the recipients of the recent letter from the retiring Presidency of the BoG and the European Commission, dated 11 July 2008. The Memorandum has been the subject of consultation and consensus among Interparents' Task force on Reform, comprising delegates from the Parents Associations of all the European Schools.

Interparents requests that the Reform takes full account of the following considerations:

- Interparents fully supports the **expansion of European education** through increased numbers and capacity of Type I, Type II and Type III schools, on the condition that the quality of European education is fully maintained and the consequent recognition of the European Baccalaureate is sustained throughout the European Union.
- **The Board of Governors is the appropriate forum** for taking decisions. Should decisions migrate to other instances, Interparents would require the same if not enhanced participation and representation.
- **The Reform is Global.** It must take full account of the inter-related aspects of most topics.
- Since several aspects of the Reform have not yet been discussed, it is **premature to take partial or serial decisions**. In particular, the reform of the European Baccalaureate is more important than the purely financial aspects of “cost sharing”.

- Interparents does not accept the proposed “**structural solution**” to cost sharing. We consider this to be an inappropriate and unnecessary compromise for a relatively small financial problem, at the expense of the quality of European education now and in the future.
- The present **infrastructure crisis in Brussels** and Luxembourg must not be allowed to repeat itself in the future, there or elsewhere. Neither should it obscure the objectives of extension of European education and wider availability of the European Baccalaureate, including in all Type I schools.
- Current policies that effectively obstruct and constrain the creation of relatively small language sections and small classes, (the **so-called “Gaignage” criteria**) have to be radically revised to take account of the linguistic consequences of Enlargement and the principle of non-discrimination.

1. Introduction:

The European Schools system has evolved over a period of more than fifty years. The opportunity for major reform presents itself quite rarely. Looking forward, the multi-lingual and multi-cultural characteristics of European education are becoming increasingly necessary for a much wider range of Europeans. The participants in the present reform process must be aware that they are developing a policy that will prevail and evolve for several decades to come. The Reform is re-designing an educational system which could become a major feature of the European educational landscape. The high quality and unique composition of European education and the European Baccalaureate are significant assets that should be maintained, improved and extended widely in the European Union.

The Reform is reaching a critical phase. Several years of debate and negotiations notwithstanding, certain important issues have not yet been addressed. The letter of 11 July 2008 sent by the retiring Presidency and the Commission to the Ministers of Education of the Member States, provides a very partial view of the process. In this Memorandum, Interparents endeavours to complete the picture, and indicate clearly the opportunities and shortcomings in the present situation.

Interparents holds firm views as to most of the subjects under discussion. We also adhere to the present organisation for the preparation of decisions and their adoption. Interparents would favour neither separating decisions in time or by forum nor migrating decisions towards entities other than the Board of Governors of the European Schools. Indeed, the BoG is the only body governing the European Schools system in which all stakeholders participate, including Interparents.

2. The process was given its present direction by the **Presidency Conclusions** of the Ministerial meeting, 13 November 2006. We should return to those sources and cross-check whether the present direction of the reform is also congruent with the **Resolutions of the European Parliament** of 2002 and 2005.

3. **The Reform is Global:** at the end of the day there are several dimensions which will have to be reconciled. The fact that we discuss specific aspects separately should not obscure the links between them. The creation of the Reform Working Group illustrates this fact. The Board of Governors should not attempt to settle issues piecemeal and trust to luck that the pieces will fit together afterwards. At present, it would appear unhelpful to try and take decisions on cost sharing and governance, when discussions about the reform of the European Baccalaureate and the “Gaignage criteria” have hardly begun.

4. The underlying objective of the Reform, is to facilitate a **significant expansion of the European School System**. Indeed, the absence of European Schools in nearly all the capital cities of the Union is a missed opportunity. One of the great ironies of the present situation is that while promoting expansion and growth, the Board of Governors is actually presiding over significant under-utilised capacity in the system, resulting in unnecessarily high costs per pupil and inefficient use of existing resources, already committed by the European taxpayer through the Member States and the European Commission.

In this context it is a mistake to argue that the expansion of the system depends solely on the creation of Type II and Type III schools. Interparents advocates that the number of Type I schools in Brussels and Luxembourg should, at the same time, be increased to accommodate a wider range of children, including “Category II and III” pupils. There has never been a demand for an exclusive and isolated education for the children of EU officials, rather the contrary. Furthermore, the other Type I schools are in several instances under-utilised. Much more could be done to enlarge the catchment area of those schools, offer boarding facilities and above all to increase enrollments until unit costs are brought down to more reasonable levels. Indeed, the anomalies that arise from the so called “Gaignage criteria” can very largely be attributed to the fact that the growth of several European Schools is being restricted.

Thus, since the principle of expanding European education has already been largely endorsed, it serves no purpose to restrict the natural growth of the existing schools. A more open-minded approach to expansion and new forms of financing is called for.

5. Regarding **cost-sharing**, as indicated above, this should not be treated in isolation. Interparents has already informed the Board of Governors that we do not support the so-called “structural solution” which involves Member States appointing non-mother tongue teachers, notably to teach English language and subjects in English language. Interparents is particularly concerned that the quality of European education

and of the European Baccalaureate could be undermined by this system. The proposed measures of ex-ante quality control have not yet been specified and in any event may prove to be difficult and expensive to implement.¹

The issue of cost sharing should of course be resolved in an equitable manner. However, it must be acknowledged that in relation to the overall costs of EU support for education, training and language services, or indeed the costs of Enlargement, the amounts involved represent a modest adjustment. It would be disproportionate to abandon the educational principle of teaching by mother-tongue teachers in the European School System for the sake of solving such a modest financial problem. Again, a more open-minded approach is called for. Recent discussions in the Board of Governors and in the Reform Group suggest that several Member States are of the same opinion.

Indeed, the conclusions of the Ministerial Meeting reported that “Some member States are in favour that there should be a closer relationship between the services received by Member States from the European Schools and the payments they make to the European Schools budget.” Not the relationship with the numbers of teachers that they second to the schools; thus, envisaging a financial compensation, rather than a structural compensation.

We have heard in the Board of Governors meetings that any solution involving financial transfers would be incompatible with the European Schools Convention. Interparents queries whether this is a relevant argument. Indeed the Convention already allows for multiple sources of financing. Meanwhile, the English Language sections are already experiencing problems arising from the application of this policy, even before it has been adopted, which tends to confirm Interparents' concerns regarding maintaining quality.

It will be recalled that this proposal for a “structural solution” emanated from a working group in 2007 in which Interparents was not represented.

6. Reform of the European Baccalaureate: The recent letter from the retiring Presidency and the European Commission² addresses a number of issues, but omits to refer to the most important current reform process, that of the European Baccalaureate.

Interparents has maintained close contact and cooperation with the consultants³ in this regard. Our resources and contacts were made available to facilitate a significant response to the survey of European School Alumni and our submission on the evaluation of the European Baccalaureate will be published shortly at the Interparents website at:

<<<http://www.interparents.eu>>>

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- 1 . Thus, Inspectors from one Member State would be interviewing non-mother-tongue candidate teachers from other Member States, before they are appointed.
 - 2 . Letter dated 11 July 2008, copied to the Board of Governors 29 August 2008 (DADEE).
 - 3 . Bureau Van Dijk and Cambridge Institute for Education.

Without prejudice to the outcome of these studies, which are eagerly anticipated, suffice to say for the time being that the Board of Governors should be cautious about taking formal decisions regarding other aspects of the Reform until the outline of the reform of the Baccalaureate has made additional progress and reached agreement.

Interparents has already indicated that maintaining and improving the quality of European education and of the European Baccalaureate are fundamental touchstones for the Reform as a whole. The continued recognition of the European Baccalaureate by all the Member States' universities depends on sustaining the quality of European education.

7. Furthermore, although as indicated above, the European School System as a whole has significant excess capacity, **the infrastructure in Brussels and Luxembourg** is insufficient even to accommodate the existing priorities, and is very far from permitting wider accessibility to the European Baccalaureate. Overcrowding is already looming in Frankfurt and Varese as well. This also applies to Brussels and Luxembourg. Indeed, it is already clear that a third European School will become necessary in Luxembourg in the foreseeable future.

Meanwhile, the fourth European School in Brussels will not be open until 2012, at best. Consequently, certain dramatic scenarios are taking shape, including the prospect that hundreds of eligible pupils will be refused registration in any of the four Brussels schools, bearing in mind that the provisional Berkendael annexe to the Laeken school is likely to be fully occupied in the immediate future. Although discussion about the fifth school in the Brussels area has just been initiated, our experience is that it could take years before classes open in the fifth school. The second school in Luxembourg is also behind schedule. Accordingly, it may become necessary to take exceptional measures to accommodate the European School population in Brussels and Luxembourg. Individual schools should also enjoy greater local autonomy and flexibility to adapt to local circumstances.

Although the retiring Presidency and the Commission are pleased to refer to the resolution of the European Parliament in 2005 and to the conclusions of the Council Presidency in 2006, we are in fact further away than ever from implementing those objectives in the existing schools.

Interparents regrets that the recent letter from the retiring Presidency and the European Commission seeks to reassure the responsible Ministers in the Member States about progress made, without mentioning such major unresolved problems and issues.

8. The mandate of the **Working Group on Reform** was established as follows:
- to finalise the proposals on Cost Sharing,
 - to put forward a proposal for improvement of cost-effectiveness and for reduction of bureaucracy in Type I European Schools,
 - to finalise evaluation of the impact of the 2000 ‘Gaignage’ Report,
 - to put forward proposals concerning the governance of the European Schools system, taking account in particular of the results of the work of the ‘Attainment Contracts Working Group,
 - to examine the legal issues raised by the reform and put forward a proposal containing possible amendments to be made to the Convention.

Thus it would appear that several other aspects of reform have yet to be addressed. In particular, the limitations on the existence of small language sections and classes arising from the so called “**Gaignage**” criteria have not yet been discussed. Although it may at first sight appear obvious that it is uneconomic to permit very small classes, the practical consequences of the present policy are counter-intuitive. Without prejudice to the forthcoming discussions on this matter (the Working Group has not yet started discussing this), Interparents would put the following considerations on the table for discussion:

- Certain language sections and classes will inevitably be smaller than optimal size because of the current registration policy resulting in costly, underutilised capacity being maintained in several schools.
- The recent sudden increase in the number of languages that must be offered, associated with Enlargement, inevitably gives rise to quite small classes in the new languages. This affects the structure of the schools' population far into the future. Thus policies affecting the demography of the schools must take account of the full educational cycle, and not be determined on a short-term basis.

The presence of small language sections and small classes is a consequence of fundamental political decisions taken by the Union and the Member States. It is not appropriate for the European School System to act as if these decisions are external to its own policy and conduct. The problem could be alleviated by a more liberal registration policy in the language sections concerned.

- The growing numbers of non-mother tongue pupils, particularly in the English Language sections, tends to reduce the demand for advanced subjects taught in mother tongue in the higher classes, sometimes falling short of the “Gaignage” criteria as presently applied.

The Reform Working Group needs to radically re-assess the objectives and implementation of such criteria for language sections and classes in the light of the completely different political, linguistic and demographic situation that prevails today. Revised criteria should be applied with intelligent flexibility to new language sections, new schools, small schools and specialised subjects, taking account of the available resources and the interests and motivation of the parents, pupils, teaching staff and directors of the schools concerned.

Conclusion

The reform of the European School system is designed to offer European education to a much wider range of European children and to make the qualification of the European Baccalaureate – at least at the present level of quality and recognition - available in a much larger number of educational establishments throughout the Union.

We have illustrated in the present Memorandum the extent to which several aspects of the Reform are inter-related. We would argue strongly against taking serial decisions, piecemeal. In particular, we consider that several issues that are currently on the table for discussion, including cost-sharing and the “Gaignage criteria” are a direct consequence of Enlargement of the EU, and of the restrictive enrollment policy. It is incumbent on the European School system to adapt itself to the new situation. The enrollment policy should be adapted to encourage the most efficient and economical operation of all the European Schools over the whole of the educational cycle and throughout the implementation of the Reform in all respects.

To this effect, Interparents seeks an early and comprehensive resolution to the reform process in the European Schools that was initiated more than three years ago. We note that notwithstanding the time and resources already applied to these issues meanwhile, several aspects have still been hardly addressed.

We consider that the Board of Governors, the Secretariat and the members of the corresponding working groups are the only available forum to resolve these issues and take the necessary decisions. Should the EU Institutions envisage taking decisions in a different forum, Interparents would require that its present level of representation and participation should be maintained, if not enhanced, in any other context.

cc: President and Members of the Board of Governors of the European Schools
Secretary General of the European Schools
European Schools Working Group on Reform
Interparents Task Force on the Reform of the European School system.
Recipients of the letter of 11 July 2008, addressed to the
Ministers of Education of the EU Member States