

INTERPARENTS

ALICANTE BERGEN BRUSSELS I, II, III & IV CULHAM FRANKFURT
KARLSRUHE LUXEMBOURG MOL MÜNCHEN VARESE

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

PRESIDENT

Brussels, 17 November 2008

Madame Renée Christmann
Secretary General
European Schools
rue Joseph II, 30
1049 Brussels

Dear Madame Christmann:

cc: Mr Anders Falk, President of the Board of Governors
Mr Alain Scriban, Director, DG ADMIN, European Commission.

Subject: European School Bureau documents: availability and publication.

Further to the discussion of this matter in the Board of Governors' October meeting, I wish to reconfirm Interparents' position, for the information of the members of the Board and for future reference. I recall that Interparents has already drawn the Secretariat's attention to this issue; our comments, dated 29 February 2008, on the Secretary General's 2007 Annual Report, are attached. To summarise our position :

1. We see no reason why the European Schools should not adopt a policy of transparency analogous to that of the European Union Institutions, particularly the European Commission and the European Parliament. Thus, most substantive preparatory documents could be placed in the public domain and be open to public comment during a pre-determined consultation period.
2. All documents could be usefully labeled as Derestricted, Restricted or Confidential. Most documents should be Derestricted in their final form and published on the Bureau's [Website](#). Preparatory documents would be Restricted during the period between preparation by the Secretariat, or in a working group or a subsidiary committee (e.g. CAF, Boards of Inspectors ...), and their discussion and decision by the Board of Governors.

Those few documents that are necessarily confidential must be labeled as such.

3. In the context of DADEE and its successor service, we consider that there should be a single category of authorised users for all Restricted documents. The present labyrinthine hierarchy of subject matter, and authorised users, is increasingly unworkable from our point of view. It is presumably also generally burdensome among the delegations, administrations and organisations which require that their representatives in the European Schools consult their colleagues and membership before taking positions.

Pending the replacement of DADEE, Restricted documents could be posted to the website in an area accessible by login and password for authorised users, as at present for DADEE. There should however be a single category of authorised users with access to all Restricted documents.

4. It would also be helpful if the Document number and the file number of each text in DADEE were to be the same, and recognised by the search engine. Documents could also helpfully carry the dates of the original, amendments, translations and derestriction. It would be preferable if documents were to be issued in a non-proprietary format.

5. The above guidelines should of course be implemented respecting data protection and privacy principles. Interparents' letter to the Secretary General dated December 2006 refers to this in greater detail ([attached.](#)) Indeed, we still encounter inconsistent application of data protection principles in different parts of the European Schools system.

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I trust that these explanations will be of benefit to the Board of Governors and to the Secretariat. I would be glad to provide any elaboration or additional details should the need arise. Meanwhile I would be grateful if you would post this letter to the Website and forward it to all members of the Board of Governors.

Yours sincerely

-/ signed /-

Christopher Wilkinson.

Attachments:

1. Interparents comments on the 2007 Annual Report of the Secretary General (extract)
2. [Interparents letter](#)

Attachment 1.

29 February 2008

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

EXTRACT

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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.

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