



Dear Ms Verheyen, Honorable Members of the EP CULT Committee,

Thank you for the opportunity to present our concerns about the European School system at your meeting of 25 February.

Education quality is one of the most important factors determining life chances for young people. Schools around the world are upping their game in order to deliver optimal outcomes for their pupils, and across Europe we see increasing competition for places at the best universities. This competition affects the European Schools' pupils in the same way as any other group of students. In order to succeed in this increasingly competitive landscape, the European Schools need to offer a teaching and learning environment that allows each to fulfil his/her potential and prepares all for the modern world.

Nevertheless, our longstanding experience of the Parents' Associations of European Schools in Brussels (APEEEs) is that the European School system is not well adapted to manage this progression and key issues remain unresolved over many years. Some of the systemic problems we see are:

- **Chronic overcrowding in the Brussels schools**, which has existed for over a decade. The much-needed fifth school was to be in place by 2015 but is now only earmarked for 2028, with as yet no firm commitment to that date;
- **Serious, widespread shortages of teachers**, notably for certain language sections and key subjects, have persisted for many years. The problem does not get solved, but rather gets worse and worse, with currently around 40% of all teachers on precarious local contracts with no certainty of employment from year to year and result in many good teachers leaving the system;
- **Budget shortages with unequal burden sharing**; the impossibility to achieve a fair contribution to the financing of the schools by all Member States based on their share of nationals attending the schools. The cost sharing solution in place further exacerbates teacher shortages, especially in vehicular sections (DE, EN, FR);
- **Continuous concerns about pupil wellbeing are not addressed**. Despite the requirement for each school to have a local Child Protection Policy in place since 2008, few schools have created a policy, and resources for addressing these issues are very limited. Schools are not able to take advantage of host country schemes and resources because the Office of the Secretary General has not confirmed that the European Schools fall under host county jurisdiction for safety, security and wellbeing. No mechanism is in place for linking the schools to these national services;



- **Difficulty ensuring equitable treatment for pupils of all language groups** due to an overemphasis on logistical and financial imperatives in pedagogical arrangements. These decisions override core pedagogical principles such as access to native language education, and particularly affect SWALS (Students Without A Language Section) and students in smaller language sections;
- **No regime of safety and security auditing in place** despite a specific demand after the infamous 2013 Woluwe School gas leak and further underscored after the Brussels terrorist attacks of 2016. Key security measures identified by Commission's directorate on Security to protect the schools are still not in place five years later;
- **Introduction of new secondary marking system without adequately safeguarding the reputation of the BAC**, and a consequent failure to ensure fair university access for the students in all EU member states;
- **Still no proper ICT/IST syllabus and digital education programme** despite the fact that the digital competence is one of the eight key competences at the core of the European School curriculum.

We believe that the school system is in need of substantial reform if it is to address these longstanding issues as well as others just over the horizon (e.g. sustainability, use of digital educational technologies, transversal skills and entrepreneurial approaches). Above all we believe that **the governance structure remains an impediment to good progress on the full range of issues**. Governance issues were already highlighted by the CULT Committee in the European Parliament resolution of 27 September 2011 on the European School system drafted under the responsibility of Jean-Marie Cavada. We note that 10 years on these specific remarks and proposals remain highly relevant and have neither been publically discussed nor acted on by those responsible for the schools. We therefore request that the CULT Committee takes up governance issues again, through an updated report and resolution.

Particular governance structure problems include:

- Lack of independent voices to quality-assure decision making.
- Insufficiently robust supervisory function to hold the system to account, in both financial and pedagogical matters.
- Interests of different Member States can prevail over the needs of the school system at the level of the Board of Governors.
- Few mechanisms for recourse to challenge decisions and outcomes.
- Directors do not have the resources or powers to manage effectively.
- Pedagogical and financial decision making is not joined-up because, despite being a full member of the Board of Governors, the Commission focuses on



budgetary issues and capping its contributions, but does not hold itself responsible for administrative and pedagogical outcomes.

(Note: These comments refer to the consequences of structures; they are in no way a criticism of the many professional staff working throughout the school system that keep it afloat.)

Possible solutions include:

1. In the long term, bring the system under **one coherent governance structure** which unites both budgetary and pedagogical responsibility with one paymaster.
2. In the short term, **the Commission**, as the chief financial contributor and whose staff represents by far the largest users of the system, **should take up its full role in the system** and involve itself in all areas and not just budget-related issues in all of the key Boards and Committees of the schools system.
3. Establish **an independent Ombudsman function** (it could be linked to the EU Ombudsman) to address complaints in a more immediate manner than the judicial process of the Complaints Board.
4. Bring **DG EAC best practice and practical pedagogical expertise** into the European Schools so that the schools become a showcase for EU educational policy.
5. Ensure the **Board of Governors is staffed with experienced individuals** who have themselves extensive education and school management experience and who are given genuine fiduciary responsibility to lead the schools over the longer term.
6. To ensure quality and transparency, there must be **proper arms-length separation** between those who deliver the education and those who oversee or inspect.
7. To maintain and drive up standards, there should be a conscious effort to **bring in talent from outside** via open competitive recruitment processes. This will help to introduce new ideas and best practices, especially for management level roles.
8. **Teacher recruitment** within schools should be within the hands of headmasters so that they are able to build a teacher cohort that meets their school's specific needs and which they also have full powers to manage. This will require sufficient Human Resources and middle-management support, which is currently sorely lacking.
9. To address the teacher recruitment challenge, there should be **freedom to set salaries and contracts** depending on market conditions and to recruit directly for multi-year positions with guaranteed salary levels, as opposed to relying only on secondment.



10. Schools need to be given both **the local management structures and the autonomy** to enable them to deliver a high-quality educational experience for pupils and a rewarding career for teachers.

In closing, mother-tongue education is a key factor in attracting staff to the EU from member states. The Commission has already identified a major problem in attracting applicants, especially from member states in the North of Europe (COM (2018) 377 final of 15 June 2018). Without an adequate schooling solution, the Commission will face increasingly severe recruitment challenges and consequent geographical imbalances or incur the exorbitant cost of international school fees as part of salary packages. Reform is needed if the European Schools are to attract and retain teaching talent, ensure sufficient schooling capacity, deliver a high-quality curriculum adapted to 21st century skills, protect the weakest among us and address pupil and teacher wellbeing and safety.

Attached you will find a more detailed descriptions of chronic problems within the system plus an elaboration on the changes we see in the Governance structure in order to address the root cause of these problems.

Yours sincerely

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ANNEX I

Problems and proposed solution in more detail

1. Key decisions are blocked or captured by Member states' competing interests

The Board of Governors for the European Schools is the supreme decision-making body responsible for the School system. Its membership is dominated by the representatives of the 27 member states, who are mostly career civil servants not schools' experts. It is frequently therefore subject to the EU politics of its member states, as though it was an EU committee, rather than a body charged with a fiduciary responsibility for running a school system.

Key decision on topics such as addressing the teacher shortage problems get caught up in national politics of how much each member state will contribute, so do not get resolved. Necessary spending programmes get blocked because some member states have a policy of resisting any increase in EU spending and carry this over to the school system. The chronic lack of school capacity in Brussels is poorly addressed because member states are unwilling to hold each other to account and ensure compliance from the host country.

What is needed: Board of Governors should be solely focused on the fiduciary needs of the system, not act as an "EU committee". Decisions about running the schools need to be separated from intergovernmental politics. Budget should be established on objective criteria.

2. The system lacks experienced leadership in educational matters and other key areas

The Board of Governors should be providing the key leadership role in ensuring the schools system rises to the challenges outlined earlier and is effectively managed. However, its members do not necessarily have the knowledge or expertise to set strategic directions or to check and quality assure proposals put before it (or the resources to do so independently). As it meets only twice per year and generally receives documents and proposals only a few days before it meets, it does not have the time or access to expertise before key decisions are taken. Thus, it is largely dependent on the capacity and willingness of the Office of the Secretary-General.

This is evidenced in the failure to put in place measures to address security and safety, despite this being a clear area of fiduciary responsibility for any Board of Governors. Another example is the introduction of a new marking scale for the BAC, which has resulted in a devaluation of the BAC in several member states.

With no direct link to the schools they oversee, Board of Governor members are remote from the issues faced by the schools, whether that be overcrowding, lack of



teachers or lack of finances. This also means that the school community feels that it has no direct representatives to turn to who understand and have a real stake in the success of the schools.

What is needed: The Board of Governors members should be required to have significant school management or education management experience at a senior level so that they are able to ask the right questions and to take the leadership role that is required of such a Board.

National inspectors must be involved more regularly in schools' life by contributing, *inter-alia*, to quality assurance, harmonisation and exchange of best practices across sections.

DG Education Youth, Sports and Culture (DG EAC), should be invited to co-represent the Commission within the system, alongside DG HR, to ensure that EU educational expertise is represented in decision-making forums. The commission is a key voice in driving up education standards across the EU via DG EAC; the European Schools should be a show case for this work.

3. The model of seconding staff is outdated and restricts the ability to bring talent into the system

Whilst the model of having member states offering staff for secondment ensured a steady supply when salary levels were more generous, it now hinders the process of attracting teachers, resulting in unfilled positions and increased use of locally hired teachers on annual contracts, creating a 2-tier system and an unstable teacher cohort. Also at the level of senior positions, whether in the Office of the Secretary General or Director level, there is a noticeable absence of candidates, limiting choice. With only a small central staff, often drawn from within the pool of the school system itself, the school system is disconnected from international educational developments and access to best practice.

What is needed: To address the teacher recruitment challenge, there should be some freedom to set salaries and contracts depending on market conditions and to recruit directly for multi-year positions with guaranteed salary levels, as opposed to relying only on secondment. To bring in new ideas and expertise, senior positions should be advertised publicly, to attract a wider range of candidates. These positions therefore should not be funded or agreed via the secondment process.

4. The system lacks a powerful supervisory function to hold it to account

Many of the issues listed here could be addressed if there was a powerful supervisory function within the school system that was able to hold the system to account and to ensure that priority issues are addressed. As the Board of Governors meets for just 3 days twice per year, it is not at all able to effectively supervise the



schools system – it is simply not present and not engaged on a sufficiently regular basis to understand the issues and follow developments.

In a national education system, this scrutiny role can to some extent be played by national educational supervisory authorities. When necessary, local media, and civil society organisations can hold the managers and leaders of the education system to account. There will also be national laws, regulations, appeals procedures and ombudsmen to provide recourse for parents and pupils if the system is not delivering or decisions are taken which are not in line with the rules. However none of these structures exist for the European Schools – the only channel of recourse is via the Complaints Board, which is significantly limited in scope and offers an unwieldy and expensive judicial option, ill-suited to addressing significant daily issues. There is no legal recourse to appeal decisions of the Board of Governors or in many cases, of the school managers. In the areas of safety, security and wellbeing, the Office of the Secretary General declines to confirm that host country law applies, therefore national regulators and agencies that would support parents, teachers and pupils are unwilling to involve themselves in defending the rights of European school families.

The whole system is self-managed and presents quite low political, judicial and administrative accountability standards. This points to the need for reviewing the Convention defining the status of European Schools.

Consequently, there is no effective supervisory organ in place to check that the school system is administered effectively. This role could be played by the Commission, which is involved in all the administrative forums of the school system, from the level of the Admin Boards of each individual school up to the Board of Governors itself. It is the paymaster of the system, contributing 70% of the total budget, so has the ability to exert significant influence. Furthermore Commission staff makes up the largest part of the families that rely on the European schools for the education of their children, so it is also a primary stakeholder. It however chooses to abstain or remain silent for all issues unrelated to finance

What is needed: the Commission should take active responsibility for the whole functioning of the system, including pedagogical and all operational and administrative aspects.

An independent ombudsman function should be established to provide a channel for recourse on issues that do not warrant the full judicial process of the Complaints Board

To ensure oversight and accountability, the European Parliament should remain engaged in the European school system. This may include representation at the Board of Governors, the Joint Teaching Committee, the Budget Committee and the



School Admin Boards, but it could also include regular reporting and monitoring of activities on both financial and educational objectives.

5. Lack of arms-length relationships suppresses vital feedback from the school staff

Feedback from teachers, Directors and others involved in the delivery of education is essential to creating a quality-driven environment and should be a key self-correcting mechanism. Without the honest advice from those who have to bear the responsibility for ‘making the education happen’, the system will not be able to learn and improve.

However teachers and Directors are reticent to bring forward problems or criticisms because they are aware that their careers are in the hands of the senior levels of the system itself, and they do not have confidence that such feedback is welcome. The Office of Secretary General is not just the administrative organ for the European Schools, it is also the direct line manager of the Directors. So each year each school in Brussels signs up to accept more and more pupils despite the management team’s knowledge that this is detrimental to the wellbeing and safety of pupils and that the school lacks capacity to deliver a quality teaching and learning experience.

Because of the temporary nature of teacher secondment assignments and the fragmentation of the teacher community across multiple linguistic sections, the organizational structure that would normally give teachers a strong voice, are absent in the European schools. Locally hired teachers on precarious contracts need to be extremely brave to speak out, for obvious reasons. All this results in a culture of self-censorship, where the complaints and concerns of the school community are kept within the school community and not passed to the power structures above.

What is needed: there needs to be a clear arms-length separation between the Office of the Secretary General and school Directors, arbitrated by an independent body such as the Commission. Support is needed to organize teachers so they can act as stakeholders in the system without feeling that to do so is a career risk.

6. School Directors do not have the power or resources to manage the schools effectively

The Directors are further hampered in managing their schools by the absence of a middle management layer - the usual structure of heads of departments with responsibility for the teachers below them. This creates the impossible situation of 100+ direct reports for a Deputy Director. This situation has been much discussed but the block to solving it is the budget implications; as mentioned, the Board of Governors and the Commission remain focused on their own priorities rather than the needs of the school system.



Directors furthermore are not involved in the selection of seconded teachers and have very limited management control over them in the course of the secondment, as the primary reporting line is to the national inspectors. Inspectors are not part of the management structure of the school and are only infrequent visitors and so are not able to provide on-going management of the teachers they oversee. Because inspectors are both responsible for recruiting and for assessing seconded staff, but not responsible for pedagogical outcomes (which is the Directors' responsibility), there is a mismatch between roles and responsibilities which creates conflicts of interest. Parents experience is that inspectors will frequently not act when a teacher they have seconded does not work out, despite being the direct superior of the teacher. Directors are not able to ensure a quality teacher cohort that meets the schools needs if they are not involved in the recruitment process and are not the direct line manager to the teacher.

With no arms-length relationships between the Directors and the Office of the Secretary General, the system is essentially top down and prescriptive. Directors are not independent, hence there are few opportunities or incentives for autonomy at the school level to generate new thinking - further curtailing the possibility of Directors to drive positive change. DG EAC, by contrast, see a strong correlation existing between school autonomy and education quality and innovation in their studies of schools systems across Europe.

What is needed: Directors need to have far more input into the recruitment, assessment and management of the seconded teachers in their schools and to be given genuine autonomy to manage effectively.

Funding must be made available to provide the same management structures that exist in schools around the world.

7. Role of the APEEEs

These weaknesses in the governance structure lead to the parents organisations, whether the APEEEs or Interparents, **becoming the key independent voice** in the schools system, holding it to account and challenging decisions – because of the absence of other such voices. This is an outsize role for entirely volunteer organisation with few resources, and is not a sustainable basis for ensuring good governance in a system as large and complex as the European Schools are becoming.