# Parents' Association Position Paper

# Preliminary Remarks for the Preparation of an Impact Assessment Study[[1]](#footnote-1) on the

# Future of the Brussels European Schools

**To the attention of the**

**Secretary General of the European Schools, Mr Marcheggiano**

**and the**

**Members of the Group de Suivi (GdS)**

**Brussels, 22 September 2017**

## 1. Background

The OSGES has planned to request to the BoG a budget for an impact assessment study (IA study) in view of assessing possible scenarios for the future of the Brussels schools. The BoG will meet in December.

At the last meeting of the GdS it was decided that each group of stakeholders will contribute to the preparation of questions which the IA study should address. At the same meeting, a document was tabled by the OSGES with two possible scenarios and the scope of the future IA study was discussed.

The APEEEs of the Brussels schools (hereinafter referred to as "the APEEEs") welcome the proposal of a proper and impartial assessment to be carried out before any decision is taken and therefore call for a well-thought-out, unbiased, and comprehensive IA study.

While appreciating the initial effort for the OSGES, the APEEEs want to underline that the two scenarios proposed at the last GoS meeting shall not be considered as the basis of the future IA study, for a number of reasons, including two major weaknesses: lack of any reference to either Berkendael and Evere sites, and wrong broad aim (i.e. redistribution of population within already overcrowded school without any forward looking approach against overcrowding).

Within this framework, the APEEEs have prepared the present Position Paper which is accompanied by two annexes: 1) a proposal for the minimum requirement that the IA study must respect and 2) a set of questions that shall be considered when drafting the specifications for the IA study.

## 2. Legal Framework

As a departure point, the APEEES consider that in principle the structure of any European school should comprise nursery, primary and secondary, and that the GdS shall help prepare the decisions of the Board of Governors (BoG) by taking the following provisions into due account:

Article 3 of the **Convention**:

*"1. The instruction given in each School shall cover the course of studies up to the end of secondary school.*

*It may comprise:*

*- a nursery school;*

*- five years of primary school;*

*- seven years of secondary school.*

*[. . .]*

*3. (a) Any proposal to modify the fundamental structure of a School shall require a unanimous vote of the Member State representatives on the Board of Governors"* (Emphasis added).

Article 3 of the **Financial Regulation**:

"*Where proposals submitted to the Board of Governors may have budgetary consequences and/or lead to changes in the number of posts, the Schools shall draw up a financial statement, enabling the budgetary implications of the decisions to be quantified and the Schools' activities to be regularly assessed from the angle of sound financial management*" (Emphasis added).

The **criteria for the setting up, closure or maintenance of European Schools**[[2]](#footnote-2):

"*The decision to set up and maintain a European School is a political decision which takes into consideration a number of factors associated with the raison d’être of these schools (i.e. to ensure the smooth functioning of the Community institutions and bodies and to facilitate the performance of their tasks).*

*. . .*

*The maintenance or possible closure of a school are the outcome of analysis and appraisal of all the factors referred to above and may not result from mechanical application of a rule setting numerical criteria*" (Emphasis added).

Against the background of these provisions, the IA study will have to respect the following requirements:

* to result in a **sound and comprehensive analysis and appraisal of all the relevant factors, including in particular pedagogical criteria,** and not be the result of mechanical application of numerical criteria;
* clear identification of the objectives pursued as well as the associated cost (in particular for infrastructure adaptations) and in particular negative impact on teachers, pupils and their families in order to allow a transparent cost-benefit analysis;
* **to assess all possible scenarios;**
* include a **proper financial statement**, taking also into account the Financial Regulation of the European Schools.

With regards to the idea tabled at the last GdS (namely that only those people working in the European School have enough knowledge of the system to perform such analysis), the APEEEs also want to stress that the IA study shall be undertaken by **professional contractors with all the expertise to provide the necessary technical support to conduct the subsequent Impact Assessment. In particular, the contractors shall have proven capacity and experience in addressing the necessary pedagogical, organisational, legal and financial issues.**

As for our proposed guidelines, the expertise of all relevant stakeholders is to be used to feed into the IA process. Therefore the representatives of the stakeholders – which should include parents, students, teachers and school management, – should be invited to participate in the Steering Group of the contract and thus they will furnish all the necessary knowledge about the way the system functions. They should not be tasked with the preparation of the IA because they lack the operational capacity to do so.

## 3. General Guidance for the Impact Assessment Study

Annex 1 to the present Position Paper provides Guidelines for the contractor which - in the opinion of the APEEEs – should be complied with when preparing the call specifications for the IA study. Therefore they should also drive the writing of the specifications of the procurement which will be launched to contract the experts who will be in charge of the IA study.

These guidelines are a simplified version of the ones used by the European Commission for its own IA, which are considered world-wide as a top standard.

#### 3.1 General requirements

* the IA study shall explain in an exhaustive manner which are the current challenges faced by the schools, following a clear and substantiated problem analysis. The IA should be based on actual data and not on assumptions lacking an evidence basis);
* the IA shall facilitate decision making and not pre-empt decisions, therefore the IA shall cover all political, budgetary, organisational, infrastructure-related and pedagogical issues
* the IA shall study, assess and compare the possible scenarios, without any *a priori* preference for any of these options ((see proposed lists of questions)
* The selected contractors should be given full access to all necessary data and should have sufficient time for a thorough assessment of the issues and development of possible scenarios.
* All underlying data and all results of the IA shall be made available to all relevant stakeholders

General requirements for the analysis of the scenarios:

* to analyse all options with regard to their effectiveness and efficiency in addressing the identified problem(s) and assessed against the baseline scenario (maintenance of the current situation)
* to take into account possible scenarios in the light of Brexit, in terms of number of pupils, section composition and staffing

#### 3.2 Specific requirements

Specific requirements for the assessment of the scenarios:

* scenarios which do not take into account the forthcoming V school and/or Berkendal shall be disregarded.

By considering only the 4 existing schools, the only result would be to re-distribute the population among already overcrowded schools. Another unacceptable weak point of this approach would be that when the chosen scenario is implemented, it might not be valid anymore if the fifth school is operating at that moment

* to take into considerations all options, among others:
* 5 schools (existing 4 and a 5th school with full capacity M1 to S7 pupils)
* 6 schools/sites (existing 4 and a 5th school with less capacity and keeping Berkendael);
* 6 schools/sites (existing 4 and a 5th school with full capacity and keeping Berkendael);
* Regrouping all S1-S7 pupils in a selected number of schools
* Regrouping all S4-S7 pupils in a selected number of schools
* Regrouping all S6-S7 pupils in a selected number of schools
* Concentration of parts of (higher) secondary cycle a selected number of schools - the so-called secondary campus for S4-S7 or S6-S7).
* Cluster solutions (North/South or East/West)[[3]](#footnote-3)

For the option of one or more schools losing and receiving pupils, a clear pedagogical, organisational and financial rationale for the location(s) and for the possible distribution of language sections should be provided. Moreover, it must be explained how pupils would be redistributed in full consideration that many families bought property close to schools or gave up places in Belgian schools which ensured proximity.

* scenarios should also consider whether geographic criteria (distance from home) should be taken into account for the purposes of enrolling and/or allocating students
* scenarios should take into account the legal implications
* scenarios should take into account trends in the school population in Brussels, both in aggregate terms and by section and by languages without section

Finally, all problems should be seen in the context of a timeline including a transparent presentation of these issues over the short/medium and long term and reasonable estimations into the future based on actual, solid data where available. Any assumptions may should be clear, and key assumptions need justifying.

For the baseline, it is equally insufficient and simply wrong to limit the assessment to the current situation (=4 schools not even including Berkendael) in 2017-2018 and to compare other, future scenarios only with such a situation.

The baseline should display the historical development over a longer period and a range of estimates for its future development if the current structure of the schools is not changed.

All simulations should:

* Present the number of pupils per class level and section at all different places (for instance no automatism for changing a specific school into a primary only school - a scenario creating such primary only schools should evaluate the pros and cons of such a change for all existing sites);
* Address the issue of section composition at all sites;
* Provide detailed and fully transparent pedagogical, organisational, legal and financial justification and motivation;
* Consider also the logistical and geographic situation of the schools, and the public transport facilities nearby
* Consider the environmental impact: a minimisation of transport emissions should be targeted in view of the climate obligations of Belgium and the EU;
* Thoroughly studying the implications in terms of choice of secondary students;
* Covering the necessary infrastructure changes per site and the time frame required for them in view of the track record of the RdB for past European School assignments;
* Evaluating the scope for balance future school populations; including a specific analysis on where the growth and decline is, so that this too is reflected in balance and future composition of the schools. More precisely, we believe on the need for an analysis on the growth and decline of the individual populations and language sections in the Brussels schools, so that future decisions can ensure long-term pedagogic viability of sections and make realistic provision for continued section growth where needed;
* Confirming whether choice-offered courses can indeed be organised easier;
* Assessing the efficient use of resources.

#### 3.3 Questions

A list of topics that shall be replied in the IA is in annex 2 – tentative list non exclusive

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## 4. Specific remarks on the possible transfer of pupils

Taking advantage of the present paper, the APEEEs would also like to express their views on a particular aspect to be considered in any future decision on possible transfer of pupils among school (even out of the framework of any IA):

Specific requirements for the assessment of the moves of current population shall be set taking into account that:

* the Brussels pupil population has been growing by approximately 400 pupils per year
* in view of the current overcrowding only scenarios with additional infrastructure beyond the current 4 schools plus Berkendael shall be considered,
* all scenarios considered that suggest the move of pupils between schools shall provide a detailed, fully transparent pedagogical, organisational, legal and financial justification and motivation why such a move is the best result for the pedagogical development of the pupils concerned, explain and provide access to all data sources used, demonstrate the quality checks carried out as regards the data and the method and evaluate whether there are no other alternative options that avoid such moving of pupils and impact on their families[[4]](#footnote-4) as well as teachers),
* such scenarios shall in any case minimise the effects on as few pupils and families currently already in the system as possible

Consequently during any transitional period – should any move be considered in future:

* If possible, changes/moving should not concern pupils already in the system and force them to move. If unavoidable, there should be long transitory periods of several years, providing families and teachers with the necessary advance warning before they have to change schools.
* Particular attention should be paid to secondary pupils and in particular those of S4-S7. Their preparation of and success in the baccalaureate must in no way be negatively affected by a sudden change in schooling resulting in unacceptably long commutes to and from school or the need to integrate into an entirely new environment (with new teachers and peers).
* Changes should in any case not require pupils to move more often than once in their school career, ideally only between primary and secondary or between nursery and primary.
* Pupils should not be moved if there is no scope for a clear benefit for them being moved, cf. requirements for justification mentioned above. In other words, moves that actually have a pedagogical interest for the students.

## Conclusions

The APEEEs call for a sound external impact assessment study implemented further to a procurement procedure

Regarding simulations, the APEEEs insist that the IA excludes any scenarios which does not encompass either or both a 5th school (Evere?) and Berkendael, and any scenario which is arbitrary in terms of choice of schools and sections affected.

The APEEEs also welcome a transparent procedure where all stakeholders are involved in agreeing to the terms of reference. We call for an as large as possible consultation of all parties all along the process.

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1. The Impact Assessment Study is a tool for the purpose of carrying out the Impact Assessment of the proposal. Experts are expected to deliver expertise that will allow the responsible administration i to produce the impact assessment. The whole methodology and process should be clarified in the document [↑](#footnote-ref-1)
2. Document amended and approved by the Board of Governors of the European Schools at its meeting in Prague on 15, 16 and 17 April 2015, [↑](#footnote-ref-2)
3. - meaning that schools not offering all class levels are permanently linked with other schools in a cluster) [↑](#footnote-ref-3)
4. In particular, siblings. [↑](#footnote-ref-4)