**Parents' Association position paper**

**on the preparation of an Impact Assessment Study**

**on the**

**Future of the Brussels European Schools**

**List of proposed topics for the IA study – list is not exhaustive – it is provide for brainstorming purposes**

**The IA must illustrate in a comprehensive way the baseline scenario (the current situation)and how it will develop in the absence of action. The IA must be based on actual data, not on assumptions without evidence.**

This section shall cover data on the following as a minimum:

Number and structure of schools

Geographical situation of schools

Infrastructures

Number and sizes of classroooms

Destination of classes (i.e. appropriateness for primary and/of secondary cycles)

Number and tipologies of other rooms necessary for quality teaching such as laboratories

gym spaces

canteens (spaces, number of users,..)

playground (covered and uncovered)

libraries

Meeting rooms/teachers room

Rooms such as etudes, etc.

…..

Accessibility

parking spaces for car and bikes.

access by public transport[[1]](#footnote-1) (metro, bus, etc)

access by bike

access for APEEE's transport, parking facilities and mobility constraints inside the sites.

access by parents / kiss and drive areas / bicycle access

relative proportion of different means used by students ,staff and families

Staff

School management and other staff (number, kind of contracts, etc)

Teachers (seconded and locally hired: current numbers, breakdown by section/subject, etc.)

Student population

Current numbers (total, breakdown per age/section, SWALS, historic development, etc)

Families (living areas, , proximity to the school, mobility, average numbers of children)

APEEEs: offices, staff, spaces for periscolaire activities, etc

Course provision

-offer of different courses (including language of tuition[[2]](#footnote-2))

- budget and sources of funding

Budget available for different headings

* Where possible the analysis of the factors should include forecasts of trends in the short/medium/long term in a scenario of "no change", meaning that the baseline scenario will not change (ex. trends for the student population, forecasts for teachers, budget, etc). In particular it is important that the impacts of Brexit (in terms of number of pupils, section composition and staffing)

are taken into account.

**The IA[[3]](#footnote-3) must illustrate in a comprehensive way the problems linked to the baseline scenario and possible trends**

Examples of areas to investigate:

* Pedagogical issues (quality of teaching in primary/secondary, preparation for exams/BAC, option choices S4-S7, lost lessons, teacher replacement, re-organisation of the timetables, respect of 180 day rules, well-being, security, Educational support provision, other policies, etc…)[[4]](#footnote-4)
* Organisational issues
* Legal issues
* Overcrowding
* Security issues
* Financial issues
* Enrolment policy issues
* Impact of Brexit

*For each problem the following factor must be assessed*

* *What are the causes?*
* *What are the consequences?*
* *How students, families, teachers and other actors are affected?*
* *What are the impacts on them if no action is taken?*
* *What should be changed for the situation to improve?*

**The IA must explain for each problem which are the objectives illustrate in a comprehensive way the problems linked to the baseline scenario and possible trends**

*IA should cover the following:*

* *For each problem, what are the SMART objectives to achieve?*
* *What are the possible scenarios to achieve these objectives?*
* *What is the logical chain between the identified problems and the scenarios considered?*
* *How any of these scenarios could influence the drivers of the problem(s) in a way that would lead towards the desired objectives? What are the indicators to measure performance and progress towards the declared objectives?*
* *How it would tackle the identified problems and meet the objectives?*

*In the IA, the following should also be explained:*

* *What are the criteria for comparing the different scenarios?*
* *What are the justifications to discard any of the scenarios?*

**The IA must explain what are the pedagogical, organisational, legal and financial impacts of the different scenarios and who will be affected**

**Pedagogical, organisational, legal and financial** Impacts on all different variables must be considered, quantitatively and where possible qualitatively, and as largely as possible , such as, but not limited to.

* Impacts on linguistic sections should consider aspects like options not offered in L1 S2-S7; options not offered in L2 S4-S7; derogations requested; derogations granted; SWALS L1 and ONL offer, etc
* Impacts on teachers should consider the attractiveness of European Schools for seconded teachers, especially those whose career development after secondment requires strong pre-BAC and BAC
* Impacts on the infrastructure should consider also costs of adapting school facilities to different uses, including classrooms, labs, sport facilities, playgrounds and other facilities to accommodate certain categories of pupils as well as transition costs, including costs of transforming facilities (classrooms, labs etc) which fall onto Belgium as hosting state
* Impacts on families should consider families with siblings, as well as possible breach of legitimate expectations (many parents have taken decisions on schools or moved based on expectations that their children would spend their entire school life in the same European school, without being forced to move to another European school)
* Impacts on pupils should consider social and logistical aspects, such as being separated from friends and siblings, impact of longer journeys, etc
* Impacts of the possible decision of families to move to the BE or other system are to be studied
* Impacts on schools' policies should consider how Well being, security, Educational support, 180-day rule etc will be impacted in the different scenarios
* Impacts on budget should consider the cost balance (less options v. more expenditure for restructuring equipment and other material conditions, for example the labs, the canteen, the physical education equipment) and take into account problems stemming from the funding agreements and formulars. .
* Impacts on the environment and well-being of children and families should be considered ((e.g. longer bus rides, polluting Brussels and its surroundings), as well as all aspects related to mobility plans and other geographical and transport/traffic-related parameters (in particular important for M + first years of primary where parents bring / pick up more than one average and for S4-S7 where pupils tend more to take public transport to get to school, also to benefit from this for exams and taking into account timetable gaps.
* Impacts on all APEEEs operation (bus-lines, canteen, periscolaire) and also staff must be considered.
* Impact of Brexit in section composition and in availability of teaching in the English section and subjects in L2.
* Etc

The IA must allow for consultation of stakeholders

* Parents
* Staff
* Students
* Managements

**When comparing the scenarios, the IA must answer to the following questions:**

*What is the expected magnitude and likelihood of all potential impacts, positive or negative?*

*To what extent the different scenarios would achieve the objectives (effectiveness)*

*What are the benefits versus the costs (efficiency);*

*What are the costs of the changes? (renovation, possible under use of certain facilities, etc)*

*The compliance of the options with the proportionality principle, and in particular of any preferred scenario, should also be considered by answering additional questions such as:*

* *Whether the option goes beyond what is necessary to achieve the objectives satisfactorily?*
* *Whether costs are minimised in relation to the objective to be achieved?*
* *Are there legal barriers for implementation and effective enforcement?*

**The IA Report should present the results of this comparison in an accessible manner, for example in a summary table, clearly flowing from the previous analysis. It should not necessarily identify a single 'right' answer, but rather show the trade-offs between different options to allow for better decisions to be made.**

1. Transport is quite self-explanatory. If detail is needed, tram and train should also be mentioned. [↑](#footnote-ref-1)
2. This should also focus in whether tuition is offered to the students in their first language of choice. [↑](#footnote-ref-2)
3. We believe that if the document is about the Study, it should not refer to IA but to the Study. [↑](#footnote-ref-3)
4. This should be mentioned below [↑](#footnote-ref-4)