



Brussels, 17 July 2019

SUBJECT: Brussels APEEEs seek clarity on state of play of New Marking System roll out

Dear Mr Marcheggiano, Secretary General of the European Schools,
Dear Mr Beckmann, Deputy Secretary General of the European Schools,
Dear Mr Munkacsy, Head of the Pedagogical Unit, OSGES,
Dear Ms Rudomino, Head of the BaccaLaureate Unit, OSGES,
Dear EEB Directors, Dear EEB Deputy Directors for Secondary,

On behalf of the parents in the four Brussels Schools, we would like to express our serious misgivings about the European Schools' management of the transition to competence-based assessment, and in particular about the roll out of the new marking scale in the secondary cycle. *We believe that as it stands the European Schools are not ready to take the next step. We urge you to ensure that all appropriate measures have been put in place before introducing the marking system in the BAC cycle.* The school direction and the General Secretariat must take urgent measures to put us back on track and to make available to stakeholders the data and documentation necessary for oversight of the process. We do not need to remind you that secrecy and obfuscation have no place in a stakeholder-governed system such as ours, particularly when it concerns a reform of this import directly impacting our future BAC students.

The Brussels parents associations fully support the philosophy of competence-based assessment that is the basis of the new marking scale. Nevertheless, we have received troubling reports indicating that: 1) the new marking scale is not being applied consistently or comprehensively, 2) there may still be misapprehension on the part of many teachers about the relation between the old and new scales, and 3) many teachers have not yet successfully made the transition to the new assessment approach. To allay our concerns, we would ask that *the management of each school share with the parents association and other members of the school administrative board detailed data on exam results and final class marks for S1-S5 showing the practical application of the new scale and complemented with data allowing a comparison of the old and new marking across levels and sections.* Simply put, time is short. It is of utmost importance that the system is applied consistently across all sections and all schools as we move forward.

In this regard, we also note that the preparations for the implementation of the new marking system in the BAC cycle are incomplete. In the *Guidelines for Use* on how the new marking system is to be applied, the section on the BAC cycle remains empty.¹ Perhaps more

¹ The *Guidelines for Use* (ref. 2017-05-D-29) developed for the new marking scale and passed by the Joint Teaching Committee in February 2018 has not been updated over the 2018-2019 school year, as mandated by the Joint Teaching Committee in its February 2018 meeting, to include information on the 3rd cycle—See Annex I.

significantly, several key S6-S7 syllabuses (i.e. Maths 3, Maths 5, Adv Maths, Bio 2, Bio 4, Chem, Physics) have yet to be transformed to the competence-based approach, and teachers will be compelled to rely only on loosely-defined “attainment descriptors” produced as a stand-in while awaiting finalised syllabuses.² Moreover, key training for teachers and subject coordinators on the application of the new marking scale is still ongoing and will not be completed until the end of 2019. Under these circumstances teachers will have little guidance on how to use the scale when marking B tests and BAC papers and students will not know how their their BAC exams will eventually be assessed, thus hindering their preparation. Both will be left rudderless at the time when solid and consistent benchmarking is the most essential. As we understand, the potential impact of the new assessment approach on the form and content of the BAC exam itself has not begun to be examined. Considering that previous changes to the BAC were the product of wide consultation and several years’ preparation, we find this particularly worrying. *It is neither correct nor fair that any changes to their BAC are introduced for students who have already entered S6, and start receiving marks that are relevant for university applications.*

Finally, we draw your attention to the necessity to update the national equivalence tables/formulae used to translate the ES students’ BAC results into local scales for the purpose of university admission.³ Over the past year, several national ministries have taken the introduction of the new marking system as an opportunity to update their equivalence tables; thus far they have proceeded without taking into consideration the impact of the new marking system on the distribution of marks, not least because no such benchmarking data has been shared by the General Secretariat. For example, in the case of Germany, one of the consequences is that it will now be much harder for students to get the required grades for many courses, seriously damaging the university prospects for European School students in Germany.

We fear that in the coming months other member states will follow suit, adjusting their equivalence tables to be ready to admit graduates by 2021. In the continued absence of benchmarking data and other relevant information, there is nothing to ensure that European School students will not be penalised in the process. We would here point to Article V of the ES Convention: *“Holders of the European baccalaureate obtained at the School shall: (a) enjoy, in the Member State of which they are nationals, all the benefits attaching to the possession of the diploma or certificate awarded at the end of secondary school education in that country; (b) be entitled to seek admission to any university in the territory of any Member State on the same terms as nationals of that Member State with equivalent qualifications.”*

We believe that as it currently stands, the European School system risks failing its students on this, most fundamental principle.

These multiple problems with the preparation, implementation and communication of the new marking system can only have a negative impact on the BAC results and university options for the current S5 students and likewise on the overall reputation of the European

² Also note that no measures have been taken to incorporate the use of the new marking system into the harmonised assessment at the end of year 5. The document *Harmonised assessment at the end of year 5 and written examinations leading to B marks in year 5* (ref. 2013-05-D-34-en-3), which is of crucial importance to students leaving the school before the BAC, still refers to the old marking system. Annex XI related to the Harmonised Examination Certificate urgently requires updating and would already need to be complemented with information on the translation of marks into national scales.

³ Document 2014-03-D-25 on equivalences between the European Baccalaureate and national tertiary system should be updated as requested by the Joint Teaching Committee—see Annex I.

Baccalaureate. *We therefore call on you to take appropriate measures to ensure a stable and consequent deployment in the Baccalaureate cycle.*

In concrete terms, the direction of each school should:

- Ensure the consistent application of the scale, as evidenced through S1-S5 class mark and exam results data (ideally provided by September 15) to members of the administrative board showing the application of the new scale in practice and allowing a comparison of the old and new marking across levels and sections.

The General Secretariat should:

- Demonstrate that adequate preparation has been made for the next phase of deployment, as evidenced through:
 - the completion of empty sections of the formal *Guidelines for Use* (ref. 2017-05-D-29-EN-6; see Annex I) ;
 - the release of updated S6-S7 maths and science course syllabuses ;
 - the update of Annex XI of the document on *Harmonised assessment at the end of year 5 and written examinations leading to B marks in year 5* (ref. 2013-05-D-34-en-3).
- Ensure that national authorities are duly informed and guided through each step of the process, as evidenced through:
 - formal and open communication describing the new approach to marking and laying out the implementation timeline, warning in particular of the risk of premature or misinformed updates to national equivalence tables and urging member states to put in place transitional measures for the first graduates under the new system ;
 - formal and open communication containing the results of an analysis of the distribution of marks under the new system, including a comparison with the distribution of marks under the old system;
 - updates to the document *Equivalences between the European Baccalaureate and the Upper Secondary Leaving Certificates of National Schools and Admission of European Baccalaureate Holders to Universities in the Member Countries* (ref. 2014-03-D-25; see Annex I) indicating progress on equivalence tables across the member states.
- Analyse the potential impact of the competence-based approach to assessment on the form and content of the BAC exam, as evidenced through the presentation of a written report, including as applicable specific guidance for inspectors and teaching staff.

If these essential tasks are not completed, parents can have no faith that the new marking system has been adequately deployed and is mature for roll-out in the BAC cycle. In the end, it is the responsibility of the General Secretariat and school direction to ensure the maximum fairness and stability for the students across the system taking the BAC from 2021. The future of these students is in your hands.

We thank you in advance for addressing our concerns.

Faithfully,

Kathryn Máthé
President, APEEE EBBI

Giles Houghton-Clarke
President, APEEE EBII

Anastassios Papadopoulos
President, APEEE EBIII

Kristin Dijkstra
President, APEEE EBIV

cc:

Günter Oettinger
Commissioner - Budget and Human Resources, European Commission

Kilian Gross
Member of Cabinet of Commissioner Oettinger, European Commission

Marco Umberto Moricca
Director, DGHR Dir E - Legal Affairs and Partnerships, European Commission

Mariana Saude
Head of Unit, DGHR Dir E4 - Agencies, European Schools and International Affairs,
European Commission

Raul Trujillo Herrera
President, Local Staff Committee (Brussels), European Commission

Konstantinos Batsilas
Greek Presidency, Chair, Board of Governors of the European Schools

Margarita Kalogridou
Greek Presidency, Chair, Joint Teaching Committee of the European Schools

Pere Moles Palleja
President INTERPARENTS

ANNEX I
Guidelines for use of the new marking scale (ref. 2017-05-D-29)

I. excerpt from the Decisions of the meeting of the Joint Teaching Committee of 8 and 9 February in Brussels – 2018-02-D-12-en-1; emphasis has been added

(p. 3) III.D. PEDAGOGICAL RULES/STANDARDS

1. Guidelines for use of the new marking scale (2017-05-D-29-en-4) M. WOLFF

The Joint Teaching Committee approved the 'Guidelines for use of the new marking scale'. As it was a dynamic document, it would be amended with extra examples, revised and further developed over time. The information on the third cycle would be added during the 2018-2019 school year. In addition, the Steering Group was requested to draft a short and simple document, containing basic information on the new marking scale, in order to inform parents and students. Document 2014-03-D-25, version 5 Equivalences between the European Bacculaureate and the Upper Secondary Leaving Certificate of National Schools and admission of European Bacculaureate-holders to Universities in the Member Countries would need to be updated in line with the new marking scale. Amending the Assessment Policy had not been part of the mandate of the Steering Committee; it had, however, become clear that revision would be required (A, B and final marks, number and type of assessment, competence-based reporting, self-assessment, assessment plans). The document would be sent forward to the Board of Governors for its information.

II. excerpts from the Marking system of the European schools: Guidelines for use Approved by the Joint Teaching Committee on 8 and 9 February 2018 – in Brussels – 2017-05-D-29-en-6; emphasis has been added

(p. 3) This document is a dynamic document, which will be completed, amended, revised and further developed over time. The chapter on the use of the new marking system in the European Bacculaureate will be added during the school year 2018-2019.

(p. 25)

Bacculaureate

This chapter will be added in 2018-2019. Specific examples will be provided.

ANNEX II
EEBII APEEE Letter to EEBII Direction
21 May 2019

Dear Mr Sharron, dear Mr Schmelz,
Dear Mrs Malik as our future school Director,

On behalf of the parents in EEBII, I would like to express our serious concerns as to the application of the new marking scale system.

We increasingly receive reports from parents that indicate it is not applied consistently or comprehensively. To address this we ask that you share with us the statistical analysis on the application of grades in practice in our school and across all the European Schools. This is a request, which is also being made by Uccle APEEE, on behalf of their parents, who have the same concern. We further request that you raise these concerns with the Office of the Secretary General now, as the current S5 cohort will be preparing for their BAC under the new marking system in September, and all such inconsistencies must be identified and ironed out by then. It is of utmost importance that the system is applied consistently across all sections and all schools.

We also note that preparations for the implementation of the new marking system are not complete. The section of the guidelines on how the new marking system is to be applied to the BAC is still an empty chapter (2017-05-D-29-EN-6). Teachers therefore will not know how to use the system when marking B tests and BAC grades and pupils will likewise not know how they are to be assessed until some point into their BAC module. It is neither correct nor fair that any changes to their BAC are introduced for pupils who have already entered S6, and start receiving marks that are relevant for university applications.

Finally, we draw your attention to the implementation of a new conversion table for the resulting BAC grades from the new marking system by some member states, which has been done without any reference to the statistical basis on which the new grades are actually based versus the previous system, not least because no such benchmarking has been shared with member states by the Office of the Secretary. In the case of Germany, one of the consequences is that it will now be much harder for students to get the required grades for many courses, seriously damaging the university prospects for European School pupils in Germany. We fear that other member states will also implement their own conversion tables shortly, in order to be ready for the S5 cohort applications, and like Germany, because they have not been provided with benchmark data on the new system, will also adopt measures that penalise European School pupils.

These multiple problems with the preparation and implementation of the new marking system can only have a negative impact on the BAC and university options for the current S5 students. We therefore urge you to request that application of the new marking system is suspended until these issues are fully addressed.

We thank you already now for supporting our concerns.

Best regards,

Bettina Schmidbauer Mogensen
APEEE II Vice President pedagogical affairs

Giles Houghton-Clarke
APEEE II President

ANNEX III
Parent Position Paper prepared for April 2019 Board of Governors
8 April 2019

Postpone Introduction of New Marking Scale at the Bac Levels

The parents of the European Schools have **grave reservations about the implementation of the New Marking Scale in the Bac Cycle** planned for the next school year.

We fully support the philosophy of competence-based assessment that is the basis of the new marking scale. However, **it takes time for the culture of assessment to adjust to the new approach** in order to arrive at a fair and equitable whole-school practice. This is especially true considering the range of different cultural and pedagogical backgrounds of our teaching staff.

Since November 2018, when the marking system was first officially employed in mid-term marking, we have received a preponderance of anecdotal evidence from schools across the system that **there is indeed wide variation in the practical application of the new marking scale**, from teacher to teacher and section to section. Since we, as parents have no access to concrete data, this is all we can present to support our concerns—it is for those who have access to the data to show that such worries might be unwarranted.

Unfortunately, there has been as yet **no official data/statistics on the results of the implementation** from the Office of the Secretary General which would evidence a consistent application of the scale across the system or demonstrate a proper understanding of the effects of the new marking scale that could be communicated in a formal and objective manner to Member States and Universities. Equally worrying, the ***Guidelines for Use (ref. 2017-05-D-29) developed for the new marking scale and passed by the Joint Teaching Committee in February 2018 has not been updated over the 2018-2019 school year***, as mandated by the Joint Teaching Committee in its February 2018 meeting, to include information on the 3rd cycle. Thus there is currently no formal guidance on how the new marking system will work in the Bac Cycle. And the important Document 2014-03-D-25 on equivalences between the European Baccalaureate and national tertiary system has yet to be updated as requested by the same body. (See Annex I)

In sum, under the current conditions we believe the introduction of the new marking scale in the Bac Cycle to be **premature and extremely risky**, jeopardizing the future of an entire cohort of students. We are **profoundly concerned by the consequences both to these students and to the reputation of the European Baccalaureate**.

The students in question will have to apply to universities with the marks they will start collecting as from September 2019 when they enter S6. How can we trust that the issue will be fully solved by then?

Therefore, we **strongly urge you to the following actions** during the meeting of the Board of Governors:

1. The agenda “point for communication” relating to the New Marking Scale shall be **moved to a “point for discussion”**.
2. The Office of the Secretary General shall be formally **requested to provide data** on the implementation of the new marking scale and on its practical consequences to the grade distribution across the system and by section.
3. **A postponement of the implementation of the new marking scale in the Bac cycle** shall be proposed until such time as:
 - a proper analysis of the results demonstrates stability in the application of the scale

- the effects on the grade distribution are well communicated to Member States and Universities by the Office of the Secretary General, and Document 2014-03-D-25 is updated to reflect any adjustments to equivalence tables/formulas.
- Document 2017-05-D-29 is revised as mandated by the Joint Teaching Committee to include guidance on the third cycle.

It is unacceptable to parents that we proceed to implement the new marking scale in the Bac Cycle starting September 2019 without clear and concrete evidence that the scale is mature, stable, harmonised and well understood by everyone implicated in the European School system.

We thank you for your consideration.

ANNEX IV
EEBI APEEE Statement to the Administrative Board,
30 January 2019

Dear Mr Marcheggiano, Dear Mr Beckmann, Dear Mr Goggins, Dear Mme Taille,

The EEBI APEEE would like to submit the attached statement as supporting documentation to Parents' Questions in the Enlarged Meeting of next week's EEBI Admin Board (point VI.2 on the new marking scale). We would add that this statement was overwhelmingly supported in the EEBI APEEE. It was agreed that, while this issue primarily concerns the German section and pupils considering taking a degree at German universities, it potentially concerns every section and every pupil.

There is a fear that the reform of the new marking scale will inadvertently result in a double standard—with students from the European Schools being compelled to meet stricter requirements than their national counterparts for university entrance. Two scenarios might lead to this:

1. Member States may re-adjust their national admissions equivalence tables/formulae prematurely and/or without full understanding of new marking system (as seems to have happened in the German case);
2. Member States might simply fail altogether to adjust the equivalence tables/formulae to correspond to the new marking system.

Both scenarios, the over-active and the over-passive, are equally worrying and could be equally detrimental to the long-term prospects of our students.

In closing, we would underscore that according to Article V of the ES Convention:

Holders of the European baccalaureate obtained at the School shall:

(a) enjoy, in the Member State of which they are nationals, all the benefits attaching to the possession of the diploma or certificate awarded at the end of secondary school education in that country;

(b) be entitled to seek admission to any university in the territory of any Member State on the same terms as nationals of that Member State with equivalent qualifications.

We believe that this suggests that these troubling developments are not just the concern of the parents but must be the concern of the system as a whole. We would like to know how the system intends to respond.

Kind regards,
Kathryn Máthé (EEBI APEEE President)

VI.2 Questions des représentants des parents (Nouveau système de notation)
APEEE STATEMENT TO THE EEBI ADMINISTRATIVE BOARD
REGARDING THE REVISED GERMAN UNIVERSITY ADMISSION DECISION
ON THE BAC EQUIVALENCE WITH NATIONAL SYSTEM

The APEEE would like to draw the attention of the Administrative Council of this school on **behalf of all the parents whose children consider studying in Germany**, to the serious concern among the parents raised by a decision of the joint competent ministries of the German Länder.

Already in June 2018, before the application of the new marking system had even begun, the German Länder revised the existing decision on the transformation of the final ES BAC mark into the German marking system. The new decision, applicable as of the BAC 2021, will considerably lower the BAC mark of the European students for the purposes of university admission in Germany. This substantially reduced the value of the European School's BAC in Germany.

The parents call upon the Secretary General to provide substantiated input with comprehensive explanations to the national universities and Member States, as was promised to parents (i.e. at the Brussels information session on 5 February 2018). This input must be a suitable basis to allow the German Länder to revise their decision in the light of a correct understanding of the new marking system and its application. It should also serve as a basis to other Member States and universities to prepare or revise, where necessary, similar national decisions in a fair and adequate manner.