



The European Parents' Association of the European Schools

ALICANTE, BERGEN, BRUXELLES I, II, III, IV, FRANKFURT, KARLSRUHE,
LUXEMBURG I, II, MOL, MÜNCHEN, VARESE

InterParents¹: Input to the upcoming European Parliament resolution “The System of European Schools: State of Play, Challenges and Perspectives” 2022/2149(INI)

INTRODUCTION

The European Schools aim to provide quality education and a safe environment for the pupils it serves, regardless of background, ability, or attainment. However, they increasingly struggle to meet these objectives, and are held back by a ‘legacy’ governance model, ill-suited to their size, role and context. Far from being in any sense ‘privileged’ schools as some contend, in reality they are often overcrowded with poor infrastructure, face a shortage of teachers, offer an inflexible and academically-rigorous programme that is often out of touch with the needs of its pupils, are stretched to fulfil basic pedagogical and administrative functions, and struggle to address the well-being and safety of many pupils.

The opening up of the European Schools System (ESS) in 2009 marked an important expansion of the system across Member States and demonstrated the relevance of the educational model beyond the European Institutions. The European Schools has the potential to be a showcase for the European Education Area, offering all pupils a broad future-proof multilingual education of high quality, supporting the development of the Key Competences for Lifelong Learning², and instilling European values from early education to secondary school. In other words, its vision could and should reflect the vision of the European Project itself.

We believe that the ESS can be an important laboratory for European citizenship, but in order to achieve this:

- the governance must become more transparent, accountable, efficient and strategic;
- the mission and priorities should be updated to reflect a broader, more expansive vision;
- the system must be stably resourced;
- the educational curriculum and teaching should assure that all students receive a quality education while also innovating to reflect best practice;
- the legal framework must be clarified and well-being approach reformed;
- and the expertise, support and commitment of all stakeholders in its wider community should be better leveraged to support this work.

In this way, the ESS can realise its potential and inspire education systems throughout Europe.

¹InterParents is the umbrella association for the Parent Associations of the traditional European Schools

²[Council Recommendation of 22 May 2018 on key competences for lifelong learning.](#)

BACKGROUND

The 2011 European Parliament resolution on the ESS³ (the “Cavada Report”) was a much-needed wake-up call. On the one hand, it drew attention to the real value in this European model of education, but on the other, it highlighted the equally real challenges faced in many domains, obstacles to the system’s further progress (see Annex 2). The report signalled that the system had reached a watershed moment. Having evolved beyond its original vision, the structures in place were no longer fit for purpose. Reading the report today, many problems identified still ring true – particularly those most fundamental to the organisation and operation of the system.

InterParents would like to thank the European Parliament’s CULT Committee for bringing this issue to the table in order to assess progress made since 2011. The external study *The European Schools system: State of Play, Challenges and Perspectives*⁴ well documents long-standing challenges and presents new challenges that have arisen since Cavada. InterParents appreciates that the study offers recommendations that are concrete and well evidenced.

We ask that the European Parliament use its leadership and scrutiny to ensure that much needed reforms of the European Schools are implemented in order to put the school system on a positive and sustainable trajectory. Drawing on previous lessons, we ask that the CULT Committee Resolution help set priorities by focusing on a few key areas and concentrating on the underlying processes and resources that would lead to a resilient, efficient, responsive and adaptive system that is able to self-evaluate and self-correct.

KEY PRIORITIES

Below InterParents proposes measures which encompass the most critical recommendations from the 2022 study. Annex 1 links our proposals to the 2022 Study recommendations whilst Annex 2 summarises the most relevant Cavada points.

Given the high share of EU contribution to the ESS and the importance of the ESS for EU staff, InterParents sees strong potential to better use the expertise of the EU institutions, bodies and agencies, in particular the European Commission and the Internal Audit Service (IAS). In fact, many of the points raised in the external study are also echoed in the 2023-2025 IAS strategic plan⁵ for the European Schools. We have tried to reflect these points in the measures proposed below, but we strongly recommend that IAS be consulted when deciding upon next steps.

A. Governance and Management

InterParents note a lack of strategic vision, poor or delayed decisions and an inability to solve problems. We estimate that problems with accountability, external scrutiny and expertise impede quality education and result in inefficiencies. InterParents is firmly of the view that this is the most

³ [The European Parliament resolution of 27 September 2011 on the European Schools system](#) (2011/2036(INI))

⁴ Gausas, S. et al. 2022. [Research for CULT Committee – The European Schools System: State of Play, Challenges and Perspectives](#). European Parliament, Policy Department for Structural and Cohesion Policies, Brussels.

⁵ [Strategic Internal Audit Plan 2023-2025 and prolongation of IAS mandate](#) (ref. 2022-10-D-33-en-2).

urgent area to resolve. Once the challenges of Governance and Management are addressed, then the fundamental structure will be in place to ensure that the system is self improving and continues to develop in line with the needs of the European community that it serves. Based on the recommendations in the study, InterParents would suggest the following priorities:

1. To make the system work more efficiently and effectively...

Perform a review of the current ESS governance at the system and school levels, including operational aspects and decision-making processes. The review should evaluate how the system operates within the scope of the 1994 European School Convention.

This should examine the various roles, structures, and entities and the centralisation vs decentralisation of different functions (with reference to the 2009 European Schools Reform that gave greater budgetary and pedagogical autonomy to the schools). It should also assess the independence of functions, identify potential conflicts of interest, and examine accountability at all levels. It would be important to analyse the role of data and the provision of data across all areas (e.g. pedagogical, staffing, operational, financial, safety and well-being) to support decision-making and the preparation of objectives and action plans. The European Commission and other European institutions and bodies with expertise in intergovernmental structures and good governance should play a key role in this task.

2. To drive improvements in performance...

All senior and middle management at both school and system level should benefit from annual performance appraisals and development plans in order to maximise their contribution.

These should rely on best practice techniques such as key performance indicators, assessment against set objectives, and 360° input. The results of these appraisals and plans should be made visible, as appropriate, to their reporting lines (e.g. Article 21 of the Convention, which stipulates that directors are responsible to the Board of Governors).

3. To hold the system to account and drive change...

a. An annual state-of-the-Schools report should be presented to the European Parliament CULT Committee. This, along with more regular reports on key initiatives, would allow the EP to monitor progress on resolutions, flag issues and play an ongoing role in oversight and change management.

The annual report should be presented by the Board of Governor's Troika⁶ in order to ensure continuity from one year to the next and include the opportunity for questions from the floor.

b. Review and reinforce the mandate of the IAS, as an independent advisor with experience of the ESS, to provide opinions and recommendations on different aspects of the ESS.

The IAS are experienced in working in an independent manner, setting audit priorities, identifying weaknesses, making specific recommendations and following up until the

⁶The Troika is the past, present and future chairs of the Board of Governors.

recommendations are implemented and weaknesses corrected. While the IAS have focused in the past on the financial and administrative areas, we welcome the planned audit of the governance system in the pedagogical area, and echo concerns raised in their plan.

4. To create a strategic vision for future governance...

In the longer term, explore alternative governance models, including a review of the Convention and the intergovernmental legal statute of the European Schools. (This should be undertaken in conjunction with C3.)

It would be important to analyse different governance models, and propose one that would be fit for the 21st century, taking account of the long-term educational vision, the efficiency of the decision-making process, resourcing, and the involvement of other stakeholders beyond member states' representatives. To achieve this, we recommend an independent assessment by an external expert body.

B. Mission of the Schools and Opening Up

The mission of the European Schools has become outdated and does not reflect the evolution in our values nor the opening up of the system. A broader, more aspirational, mission would serve the governing bodies as a reference point to help guide pedagogical strategy. It would clearly communicate our purpose and values within our community and enhance visibility in the Member States. A revitalised mission should include aspects of opening up, but it is also important that it be backed by a sustainable model which ensures that the ESS is resourced to serve the whole expanded community. Based on the recommendations in the study, InterParents would advocate the following:

1. To revitalise the pedagogical vision of the ESS...

Call on the Board of Governors to update the mission, principles and objectives of the ESS (e.g. a Charter for the 21st century) to ensure that we balance an aspirational vision with realistic objectives against which the ESS can be assessed. The EP should perform an ongoing oversight role (in line with A3a. above).

2. To ensure that the ESS can sustain and support the opening up...

Call on the Board of Governors to review the funding and operating models in relation to the Accredited European Schools (AES).

The central functions must have the necessary resources to support the growing system, and all schools in the system should offer comparable employment packages, benefit from comparable inspection regimes and provide a comparable education to all pupils. (See C2.)

3. To improve visibility in the Member States...

Form stakeholder teams (e.g. governors, inspectors, teacher, parent, and pupils) for each Member State to develop specific action plans on how to improve the visibility, and understanding of the ESS and European Baccalaureate as well as to forge links with local communities and national education programmes, particularly in host countries. This should involve the EU institutions and bodies in the Member States.

C. Resources – Staffing, Infrastructure and Funding

Significant challenges faced by all our schools stem from non-fulfilment of Member States' obligations. When Member States do not meet their obligation to second teachers, the European Schools are driven to rely on locally-recruited teachers with non-competitive employment packages.⁷ This results in a high turnover and a shortage of qualified staff creating a sub-optimal environment for teaching and learning. When host countries do not meet their obligations to provide suitable premises, sites become overcrowded, suffer a lack of classroom capacity and core educational facilities (e.g. labs and gyms) and fall into disrepair. This again creates a sub-optimal environment for teaching and learning. InterParents shares the concerns about resourcing identified in both the study and the 2011 EP resolution and would advocate the following:

1. To resolve ongoing teacher shortages and ensure stability...

Call on the Board of Governors to strengthen the employment package for all (seconded and locally recruited) teachers in order to offer competitive compensation, stability of employment, continuous professional development and good career prospects. This would improve the attractiveness of the European Schools as an employer and reduce teacher turnover.

This exercise should also include a review of the hiring process considering possibilities to centralise recruitment. The expertise within our wider community (for example the European Commission) should be leveraged to develop an attractive employment package.

2. To resolve critical resourcing issues...

Form a task force of all the European institutions and bodies who fund our system (European Commission, ECB, EIB, etc.) to bring pressure to bear on Member States to meet their existing obligations, namely the secondment of teachers and provision of infrastructure (i.e. suitable premises, maintenance, upgrades). The possibility of direct financial contributions in lieu of "in kind" contributions should be considered.

We recognise that there would need to be a political will to resolve this issue and therefore it is a hard point to tackle, but nevertheless, if the motivation could be found, this would bring about a key step change in the resourcing of the European Schools. The task force should include relevant pedagogical expertise (e.g. DG EAC and OSGES).

3. To create a strategic vision for resourcing...

The task force (see C2 above) should develop a proposal for a comprehensive and sustainable cost-sharing model for the future that allows the ESS to fulfil their mission. This should be undertaken in conjunction with A4.

D. Pedagogical Programme and Staff

The results of the 2022 PISA for Schools tests have demonstrated that ESS children as a group achieve far above the OECD average (though slightly below the average for their socio-economic category).

⁷Employment conditions which are against the spirit of the *The European Pillar of Social Rights*. In particular, its [Principle 5](#).

The system is also well placed to become a European leader in several areas (e.g. the European dimension, CLIL/multilingual education) and a showcase for European initiatives such as the *Key Competences for Lifelong Learning*.⁸ Still, parents note variations in quality, an administrative and often rigid approach and little drive to innovate (e.g. digital skills, entrepreneurship, sustainable education). The ESS struggles to maintain a consistent standard for all students and to set long-term educational strategy due to the unclear commitment and role of the inspectorate as well as underinvestment in the system-level pedagogical team and teaching staff. Based on the recommendations in the study, InterParents would advocate the following:

1. To assure the quality of the educational offer and drive change...

- a. Call on the Board of Governors to set up a task force to review the quality assurance approach put in place as part of the 2009 European Schools Reform.
This review should consider the monitoring and evaluation processes, the role of Key Performance Indicators (KPIs), and provision and use of pedagogical data. Quality assurance roles and responsibilities should be well defined at all levels and reporting and feedback loops should be clarified. The European Commission's DG EAC should play a key role in the task force.
- b. In the context of the above, the role of inspectors should be revisited and their role in quality assurance should be strengthened through the introduction of an enhanced inspection regime and follow-up processes (including school, subject, thematic and staff inspections) across the whole ESS, including AES.
Their tasks should include the definition of KPIs based on system priorities and the delivery of measurement tools to school managers and coordinators. Reporting lines should be reexamined and ethical walls introduced between inspectors and the pedagogical staff and management they are charged with inspecting. The obligations of member states to provide inspectors should be reviewed.
- c. In the context of the above, the role of the OSG Pedagogical Development Unit (PDU) in pedagogical and curricular development should be reinforced through the addition of professional posts and updates to the organisational structure.
The unit should serve the whole ESS, including the AES, and their tasks should include proposing and implementing a strategic vision rooted in the ESS mission, carrying out curricular development, creating common instruction material, providing curricular guidance and support to teachers and managers, sharing good practices, and implementing a continuous professional development (CPD) strategy for pedagogical staff.

2. To strengthen delivery of the educational programme and harmonise approaches on the ground...

Call on the Board of Governors to develop a Continuous Professional Development (CPD) strategy for teachers across the whole ESS.

⁸[Key Competences for Lifelong Learning](#) (May 2018).

The programme must be appropriately resourced and should include areas of pedagogical priority defined in the strategic vision, such as: educational support, differentiation, and inclusiveness; competence-based teaching and assessment; content and language integrated learning (CLIL); education for sustainable development; and digital teaching and learning. The programme should span the teaching lifecycle and be responsive to the changing needs of the system.

3. To increase inclusion and improve the educational opportunities for all students...

Call on the Board of Governors to review and strengthen our provision to students with particular educational needs. This would include continued progress on *Policy on the Provision of Educational Support and Inclusive Education in the European Schools* (and supporting procedural documents and action plans) to bring the system in line with the UN Convention article 24⁹. But it would also be important to ensure students in small language groups (e.g. SWALS, ONL) a high-quality educational offer on par with their classmates as well as to create real learning options for students wishing to follow vocational, artistic or non-academic pathways. Goals should align with the vision of the [European Agency for Special Needs and Inclusive Education](#) and the [Sustainable Development Goal 4, Quality Education](#).

4. To promote educational quality and best practices...

DG EAC should be empowered to represent the European Commission alongside DG HR in school and system decision-making and consultative bodies.

The European Commission should not only weigh in on budgetary matters, but should also bring its educational expertise to bear on the provision, quality and evolution of the educational programme (i.e. the value we are receiving for funds spent).

E. Legal Aspects - Competence, Recourse and Health and Safety

The European Schools currently operate under a framework of legal uncertainty. We do not have answers to even the most fundamental questions regarding how EU law, and more specifically the fundamental rights recognized by EU law, apply to the European Schools, and the competence of their Complaints Board and/or the National Courts to resolve legal disputes is unclear. In particular, uncertainty about the application of health and safety rules exposes thousands of students, teachers and staff to safety and well-being risks. It is important to set the European Schools on solid legal footing, ensuring that the applicability of national and EU law is clearly established and that there are recourse mechanisms and mediation channels in place. Last, but by no means least, our health and well-being approach must protect our most vulnerable pupils. Based on the recommendations in the study, InterParents would advocate the following:

⁹These were updated in response to the 2015 UN recommendation to the EU and to the European Parliamentary Resolution of 30 November 2017 provision 101, which "Calls on the European Schools, nurseries and after-school centres to provide quality inclusive and UNCRPD-compliant education to all children of EU staff, including those with complex or high-level support needs".

1. To ensure the European Schools operate on a sound legal foundation...

- a. Call on the Board of Governors to declare the applicability of primary and secondary EU legislation to the European Schools and to refrain from approving any provision that does not comply with EU legislation.
- b. Call on the Board of Governors to amend the staff regulations¹⁰ and the *General Rules of the European Schools* (ref. 2014-03-D-14-en-12) explicitly clarifying on which matters the Complaints Board is competent and on which matters national courts are competent.
- c. Call on the Board of Governors to put in place an independent Ombudsperson to address complaints about bad administration and to mediate conflicts between parties within the European Schools.

2. To raise standards on safety and well-being and ensure that students and schools are safe...

- a. Call on the Board of Governors to prepare a detailed plan to bring all schools into legal compliance with national capacity limits and to align our approach with national and international standards and best practice on health and well-being.¹¹
This plan should be undertaken as a follow-up to the 2022 European Schools Well-Being Framework. The plan should include measures for the reinforcement of the CARE Teams and for an increase in school psychological services to bring them in line with those in national school systems (in terms of support staff per pupil). The plan should be submitted to the European institutions, including the European Parliament (as part of A3a.), for review.
- b. Establish a clear role for host country authorities and resources to counter the lack of internal expertise and of means for compliance in matters relating to safety, security, child protection and well-being in the European Schools in each Member State.
This includes ensuring that the national standards on safety, security, child protection and well-being applied at national schools are also applied at the European Schools located in each Member State and that they are supported by periodic external audits. By extension, the European Schools and families should have recourse to the psycho-social services available to national schools.
- c. If the above is not practical, then designate a body of independent experts on safety and security at the national member state level to monitor the schools' compliance with the applicable rules and to take appropriate actions.

¹⁰See: *Regulations for Members of the Seconded Staff of the European Schools* (ref. 2011-04-D-14); *Service Regulations for the Locally Recruited Teachers in the European Schools* (ref. 2016-05-D-11); *Service Regulations for Locally Recruited Managerial Staff of the European Schools* (ref. 2020-04-D-23); *Service Regulations for the Administrative and Ancillary Staff (AAS) of the European Schools* (ref. 2007-D-153).

¹¹For example see: World Health Organization. 2014. [European framework for quality standards in school health services and competences for school health professionals](#). WHO Regional Office for Europe/WHO Regional Office for Europe, Copenhagen. Council of Europe. *Improving Well-Being at School*. Inter-agency Network for Education in Emergencies (INEE). [Standard 2: Protection and Well-being](#).