



## The European Parents' Association of the European Schools

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

04 December 2022

To the members of the Board of Governors of the European Schools,

Dear Madam/Sir,

Without prejudice to the position referred to in our letter dated 30 November 2022, hereby InterParents would like to express the difficult situation in which all the 13 Parents' Associations find themselves and the prejudice that the proposed amendments of the General Rules on security would imply for the school communities.

If the proposed amendments are approved, it may lead to the situation that the Parents' Associations of the European Schools would have to withdraw their involvement in the provision of the services concerned.

InterParents would like to underline that the approval of the amendments to the General Rules would generate even more legal uncertainty as to how the responsibility for safety and security is shared between schools, Parents Associations and external organisations.

This uncertainty will come as a result of the lack of coherence between the proposed amendments and Art. 6 of the Convention, which establishes the legal framework of the European schools and states that national rules apply, unless there is a specific provision in the Convention. This loophole could lead to legal disputes with significant financial implications related to insurance coverage.

Furthermore, InterParents would like to reiterate once more that the proposed amendments are *ultravires*, as they exempt the schools from liabilities and responsibilities, making Parents' Associations responsible for aspects that are outside their control.

We therefore strongly urge you NOT to approve the proposed amendments. As stated above, the amendments prevent Parents Associations from being able to continue their strong commitment to the smooth running of a number of crucial services for the whole school community.

We would like to recall that directors of the European schools as well as the directors of national schools shall be responsible for the safety and security on the school premises according to the national rules applicable to educational establishments governed by public law.

Yours faithfully

Pere Moles-Palleja

President of InterParents