

Dear Parents,

We wrote to you at the end of last term with information about the Belgian proposal to open a temporary school at Arts-Loi to which all S6 and S7 pupils from Woluwe and Ixelles schools would be transferred. This is meant to free up space at the two schools for the enrolment of new pupils arriving in the school system, which in Brussels each year exceeds the number who depart by hundreds. The proposal comes from the Belgian Federal authorities, who are responsible for providing the site and buildings for our European schools. It is supported by Mr Marcheggiano, the Secretary General for European Schools.

It is intended to be a temporary solution, until a new fifth school will be built by 2024, on the site of the old NATO headquarters (this has yet to be officially confirmed but has been reported in the Belgian press). According to the forecasts of the Office of the Secretary General, the fifth school was needed as of 2017; it is therefore highly regrettable that those responsible have failed consistently to bring this about despite the clear need for additional capacity, and therefore now need to resort to quick fixes.

Woluwe APEEE supports measures to reduce overcrowding. However, we have some serious concerns regarding key aspects of the current proposal for the temporary site, which are listed below. In summary, the Arts-Loi premises is an office block, not a school building, with a canteen for 150 people (the projected pupil occupation number is up to 1200). We understand that the normal full range of school facilities will not be provided, for example there will be no sports or gym facilities or space for after school activities. There is only a very small courtyard as outdoor space. Our children will therefore have to spend most free time on the street - in an area with pollution levels up to 2.4 times the legal maximum, with all the harm that causes to their health and mental development. Being an extremely high traffic area, it is also not a safe environment for children. Many children will have substantially longer journey times, depriving them of the vital study time in the critical last years.

Furthermore, teachers will need to travel between school sites, losing valuable lesson time in transit. As well as damaging education quality through fewer lessons/subjects this is strongly opposed by many teachers which will make recruitment much more difficult. New teacher will surely be needed but no plans have been made.

In the past there have been discussions about creating a common upper secondary school for senior year pupils across the four Brussels schools. To avoid any misunderstanding, the current proposal is for two entirely separate schools operating at the premises in parallel, each part administered by the respective main school, and not for an upper secondary campus in a genuine sense; There will be no joint classes or greater range of subject options, or combination of small classes into larger ones.

For clarity, the APEEE does not here take a position for or against the establishment of an upper secondary school in Brussels. Our concern is to ensure that whatever solution is enacted, it meets the basic requirements for a properly functioning school.

We have communicated our concerns to the Belgian Federal Government, Mr Marcheggiano and Commissioner Oettinger, who is ultimately responsible for the schools within the Commission. The proposal to use the Arts-Loi site was discussed at the Board of Governors meeting in December - at which our concerns were expressed by several Board members. But we need to urgently do more; key decisions are being taken imminently.

It is essential that answers are provided to our questions by the Office of the Secretary General before any commitment is made. If adequate answers are not forthcoming, the current proposal must be re-considered in favour of other options that do not harm the education or health of our children.

We need your help; please read the list of key questions on the following page and contact any people you know in the EU institutions or your home government who may be able to apply positive pressure to ensure they are properly addressed; a rushed decision that results in a bad outcome for our children and their teachers must be avoided.

We shall continue to raise these matters with the school authorities in all forums available, and will keep you fully informed of developments.

APEEE Board

KEY QUESTIONS THAT NEED TO BE ANSWERED

How will the quality of education of pupils be ensured?

The plan assumes that teachers can be made available from the existing schools to teach the final year pupils at Arts-Loi. But these teachers also have teaching obligations for other school years at Woluwe school. They cannot move between sites without sacrificing a considerable number of teaching hours on travel. As timetabling of lessons is already extremely challenging given the number of different sections and subjects, it is not possible to conceive that teachers can deliver lessons in two different locations without there being a significant reduction in lessons given and subject choices available. It is worth recalling that the Office of the Secretary General previously analysed the option of setting up a secondary campus for senior year students in Brussels schools, but concluded it was not feasible because the timetable could not be made to work so that the necessary number of teaching hours were delivered. And that was without factoring in teachers being spread across 2 sites. The consequence can only be fewer options being offered (as has been signalled already) and fewer lessons delivered to final year students preparing for their BAC. We therefore ask why the Secretary General now decided to reject his own report of a few years ago and pursue a solution that will represent a significant degradation of education quality for the pupils.

We understand that teachers share these concerns and are not therefore in favour of such an arrangement.

Without a significant increase in budget, how will the additional costs of new teachers and other staff be paid for?

The proposal that has been outlined for the Art-Loi site is as an annexe of both Woluwe and Ixelles, i.e. not a school in its own right. This would avoid the necessity of a Board of Governor decision on creating a new school, but also requires that costs are met from existing school budgets. We do not see how this is possible, given firstly the need for more teachers, as noted above, and secondly, because as a separate site, Arts-Loi will need the full complement of support staff, facilities management staff, security and of course headmasters or managers to oversee the 1200 pupils. Existing school budgets are very tight already and mostly accounted for by salary costs, which are fixed. No agreement has been made with Member states to provide additional teaching therefore gaps will at best be filled by local hire teachers. As you will be aware, the contracts for such positions are very unattractive at present hence good teachers cannot easily be retained and subjects such as science and maths in languages other than French are almost impossible to fill from the local market because skilled teachers are either not present or have much better options elsewhere. The risk therefore is that Arts-Loi is set up without the necessary budget or teacher resources, which will lead to a situation of poor supervision, inadequate staffing, lack of teachers for some subjects, lack of proper security and little if any management presence. That is a recipe for disaster, for the pupils, teachers and school system.

How will sufficient free time space be made available?

The Arts-Loi site has very limited free space areas, no recreational areas or outside space except for 2 small quadrangles. There is no park or other space the students can use in the immediate vicinity without crossing major roads. Pupils have free time for breaks and lunch during which they need somewhere to go. We cannot accept pupils being forced to spend their break time outside the school premises in the highly polluted and congested Arts-Loi junction area. Lack of available break-time space is not compatible with normal school life.

How will facilities be provided for sports and school activities.

Although we are told school facilities will be provided, we understand this will not be comprehensive, for example there will be no sports or gym facilities. But these are required for the curriculum so cannot simply be withdrawn or provided only via a separate bus journey to another location during an already hectic school schedule. And part of the fabric of school life and a normal education are activities such as sports days, orchestras, choirs, school concerts, arts shows and multiple other activities. Many pupils also participate in sports, dance or another activities arranged on the school site. If there are no facilities, how will these essential parts of school life be delivered at the Arts-Loi premises?

What are the plans for ensuring there is sufficient infrastructure in place to support 1200 pupils?

This will be a school of significant size and will therefore need the normal range of fixed infrastructure, yet the premises, which is currently an office building, is not designed to cater for this number of people and has not been built to act as a school. Although there seems to be a small canteen in place (only for 150 students), it is not big enough to cater for 1200 pupils, so it is entirely unclear how pupils will get lunch; roaming around the streets of Arts-Loi to find a sandwich is not an adequate solution. What will be done therefore to ensure it is fit for purpose, and has adequate canteen facilities, preau areas, educational support facilities, WCs, public spaces, management offices, security facilities etc?

How will pupils avoid excessively long journeys, given that Arts Loi will not be served by school buses?

It will not be possible to operate a bus service to the Arts-Loi premises therefore pupils will be asked to take public transport. Many families do not live close to metro stations, and rely on the school buses. Although in these circumstances the school bus service will be able to bring the pupils to the metro, pupils will be faced with further 30-40 minute journey to get to Art-Loi. A 1-1.5 hour commute to school is an excessive burden to place on pupils, especially in their final years when they need more time for studying.

What changes will be made to the surrounding road infrastructure to ensure parents have easy access to the school site by car

Many parents will need to collect or drop off pupils at the school, especially if this is the only alternative to lengthy journeys on public transport. How will this be possible as there are no facilities for this at the location and evidently parents arriving and leaving will cause very

significant traffic jams for themselves and all other road users in this area - which as we are all aware is already one of the key arterial nodes of Brussels and highly congested.

How will pupils be protected against the polluted environment of the Arts Loi area?

In 2017 Client Earth sampled air quality around Arts Loi, Rue de La Loi and at the nearby American embassy building and concluded "These are shocking levels of air pollution. By hiding the real state of the air in the capital, the Brussels government is exposing all of us to unacceptable health risks". NO2 levels at the US Embassy - which is very close to the proposed school site, were found to be 99.44 microgram per cubic metre, almost 2.5 times the legal maximum. On Rue de La Loi they were 2.3 times the legal max and 1.8 times at Arts Loi itself. High pollution levels are associated with significant health damage and impact on intelligence. A high pollution environment is not an appropriate site for a school. We support the view of the city of Antwerp, where regulations stipulate that no schools should be built in areas with NO2 pollution higher than 42 microgram per cubic metre or where the noise is more than 70 decibels.

Why are other options not being considered?

Why are sites much closer to the Woluwe and Ixelles schools, in less congested, less polluted areas not considered which would avoid many of the above problems? In particular why is a quick-build school premises (using modular building techniques) not being considered as the starter of the 6th school on the already vacant NATO site? This is a more convenient location that can be served by school buses and has the space for a full complement of buildings to ensure a normal school environment. It could therefore be used for new pupils arriving in the school system, rather than forcing existing pupils to move and could potentially be delivered in as short a time frame as converting the Arts-Loi premises. We also would like to know why only Ixelles and Woluwe are candidates for this proposed new school.