The Parents association of the European school Luxembourg 2
L'association des parents d'élèves de l'école européenne Luxembourg2
Die Elternvereinigung der Europäischen Schule Luxembourg2

TO THE ATTENTION OF THE SECRETARY-GENERAL OF THE EUROPEAN SCHOOLS

MR ANDREAS BECKMANN

Mamer, 20.01.2022

Organization of studies for SWALS at the European School Luxembourg 2. Mamer

Dear Mr Beckmann,

We are writing to you to draw attention to issues causing problems for SWALS in the European School Luxembourg 2 as inequalities between SWALS and non-SWALS pupils, in terms of their teaching schedule, non-efficient, contra-productive organization of L1 studies, inadequate L2 curricula, disadvantages in their access to school-transport infrastructure.

Despite the commitment of the school management, the good will and hard work of the teachers and the supporting staff, certain aspects of the organization of the studies make the school a very different experience for SWALS than their fellow students. Beside the obvious expected differences and difficulties, the concerned students have to face many unexpected challenges and the situation is getting worse year by year. Many parents agree that we have reached a point, where immediate intervention is required from the governing bodies to avoid serious consequences.

While the language policy describes, that "SWALS pupils benefit from the provision of their dominant language tuition"[1], the outcome of the existing rules in place can be rather disadvantageous. The organization of the studies for them is much worse as of those having their own language section. The school ethos requires "the existence and implementation of a school policy for equal opportunities for all pupils, irrespective of gender, ability, ethnicity and social circumstance"[2], but the many unexpected disadvantages, SWALS might have, put the concerned students in a second-class status. In the long term this can lead to turning away the families from the school, whose mother tongue/dominant language is an EU language but not represented in a form of language section.

After meetings with the school management and internal discussions with parents, we came to the conclusion that while ES Lux 2 management is committed to provide high level teaching to all students (independent of their cultural background), they have difficulty solving certain problems because of the restrictions, that the

[1] https://www.eursc.eu/BasicTexts/2019-01-D-35-en-2.pdf page 8.

[2] Quality Assurance and Development in the European Schools https://www.eursc.eu/BasicTexts/2000-D-264-en-2.pdf

strict application of the regulations imply and because of lack of flexibility and understanding of the supervising organizations.

The problems do not affect every SWALS in the same way. Depending on the language they learn **some of the students have fewer of these problems or even not at all**, **others have to face all of those described in the annex of this letter**, but this can change from one year to another. The implementation of the SWALS system, the outcome of the rules are unpredictable.

The regulations of the European Schools do not seem to guarantee the quality standards of L1 education for the students, who are enrolled as SWALS. For them L1 is often treated as if it would be an optional study, not as the most important mandatory subject.

The organization of the L2 language teaching, the lack of differentiated groups and skill level appropriate teaching methodology is disadvantageous for the concerned students and makes it difficult to reach their full potential. Some of the L2 lessons turn out to be a waste of time for both the students and their teachers.

While the strict financial supervision of the school obliges the management to cut corners everywhere possible and forces pushing money saving practices to the maximum possible, seemingly there is no quality assurance system in place which would identify serious pedagogical problems and would intervene before it's too late.

The SWALS profile, the relatively low number of students with a specific mother tongue might make it necessary to have a different organization of the studies than the children having their own language section, but this can not be used as an excuse for neglecting their pedagogical needs. SWALS education should be treated just as seriously and equally as other students'. The regulatory framework must guarantee that the European Schools will be able to fulfill their mission, the governing bodies must provide the necessary support which guarantees high level education for all enrolled students.

We would like to kindly ask you to

1. **Investigate** and analyze the situation of SWALS in our school, mainly focusing on the problems listed in the annex. Inform the concerned parents about the result of the investigation, if the outcome of ES regulations
    a. is in line with ES teaching concept and ethos
    b. provides support for the school to efficiently use modern pedagogical methodologies
    c. guarantees equal opportunities for all students.
2. **Introduce quick, short term** temporary measures which can remediate the problems for the current school year.
3. **Review and update the concerned regulations** to provide a **long term solution** for the following generations.

We are looking forward to your reply.

Yours Sincerely,

Association des Parents d'Élèves de l'École Européenne II (APEEEL2)

SWALS Working Group

Tibor Tuboly, Mateja Prajs, Sonja Kostadinovic

The APEEEL2 management committee in its meeting 9.12.21 decided to support this letter and request the investigation of the above-mentioned issues.



André Schmutz

APEEEL2 President

Annexes

Annex 1. - List of problems to be considered for a close inspection

Secondary - L1 lessons on free afternoons

According to ES Lux 2. school memorandum[3] non SWALS S1-S5 students don't have their mandatory lessons on Tuesday afternoons. The afternoon after period 5, S6, S7 after period 7. (for S1 also Thursday afternoons) are kept lesson free. The same memorandum clearly describes that SWALS might have L1 lessons on the free afternoon. Although in the past this case was the exception, year by year the situation was getting worse until we got to the point that SWALS having mandatory L1 lessons on the free afternoon became a common principle of the timetabling. By our understanding this situation is the consequence of the circumstances (many SWALS with different L2), but also the result of the too strict application of the cost saving measures.

Students and their families have to face the following difficulties:

- Too many gaps - Although it is understandable that most of the students have gaps from time to time in their timetable and not every class can have an ideal timetable, having 3 or more gaps in a week or 2 or more gaps in a day is an unnecessary extension of the already long school days (see Annex 2). These gaps (also called "free periods") are not used efficiently. Younger students e.g. S1 students are told to go to the study room and stay quiet, similar to having another lesson. Older students often just play with their mobile phones as not having other options for recreation, sport, research or a place for socializing with their peers. SWALS having gap lessons, when their class attends L1 lessons together, they might be left out from school projects or even safety related initiatives such as the covid testing campaign.
- The children have no balanced rhythm of life. The school schedule can be very different day by day. The school day can "start" with 2 gap lessons. On other days, an S1 school day can have lessons from 8:45 to 16:30 with 5 minute breaks, which can be considered as a full working day for an adult.
- As for SWALS the school day ends later, they have less chance to attend periscolaire activities and other projects organized in the school building. It is more difficult to take part in social activities organized by local sport clubs, music schools or other associations.
- With mandatory lessons on the free afternoon(s), the concerned students are unable to use the school bus network every day as the departure times are adjusted to the "free afternoon" concept. This is a service which is partly organized by the parents, but mainly provided by the Luxembourgish authorities free of charge or subsidised by the EU institutions, from which SWALS can not benefit from.

[3] http://www.eel2.eu/en/page/memorandum Section 4. Timetables Secondary school

- The travel (with additional waiting) time can take up to one hour longer if the student has L1 lessons on the free afternoon.
- Younger secondary students might not be capable of using the public transport network so parents have to pick up their kids at the school as they do not have any other safe option on these days.
- As there is practically no school infrastructure open on Tuesday afternoons (study room, recreational room, library are all closed) kids are waiting on corridors for the transport as not having a better option.

These circumstances raise questions concerning the equal treatment of these students in comparison to others, as these students have considerably less freedom of choice and, moreover, have to stay longer at school, affecting their free time and potential leisure activities, necessary for resourcing themselves.

Secondary - Teaching L1 in merged classes with relative large group size

The L1 group merging situation in the secondary school is getting worse year by year. Until now parents were reassured that only classes with less than 7 students will have to have merged lessons with other groups. From this September we were confronted with the fact that the school is obliged to merge groups well above this limit. Merged SWALS L1 lessons had to be organized for even with 23 students (9 and 14 students from two age groups), which is far above the rule: "The minimum group/class/option size is seven pupils. In years 6 and 7 the minimum option size is five pupils."[4] The current regulations are not clear about the maximum L1 merged group sizes. Meanwhile optional studies are explicitly listed as exceptions, these can be organized with just a few students participating each lesson.

Merged L1 lessons are disadvantageous for the concerned children in many ways:

- There is absolutely no overlapping in the syllabus so the students are not taught together but side by side, in certain situations with different organization, even in different classrooms by the same teacher, who has to divide attention between the two groups and move between classrooms.
- Because of the merged organization, the teacher has to spend much more lesson time on assuring a calm learning environment.
- Students are often instructed to work alone, so it does not make sense to keep the students in the school on a free afternoon if they have to work individually anyway.
- The SWALS L1 classrooms are not always capable of accommodating a large number of students. This is especially problematic now, when students are supposed to keep a minimum distance from each other during the lesson, which is impossible because of the classroom size limitations.
- Merged lessons are less efficient which expects the students to spend even more of their free time learning at home. Considering that these students have less free time because of the extended teaching days, the merged class teaching impacts them to an even greater extent.

[4] Organization of studies page 4. https://www.eursc.eu/BasicTexts/2019-04-D-13-en-2.pdf

- The current rules in place do not allow specific considerations. E.g. the following circumstances are ignored:
    - S6-S7 groups require more attention and well structured lessons as they have to prepare for exams
    - Group with students who receive intensive support or struggle with attention deficit.
    - Lesson on a free afternoon, lesson at the end of the day in the 9th period.

SWALS have to pass exactly the same or similar BAC tests as in the country of origin (even if they were not growing up there in full language immersion). As L1 is a major subject the final grade will be affected by the current restrictions, so will lower the chance to get admission to the university of choice.

The main purpose, the reason for the existence of the European Schools and the SWALS system is to provide mother tongue education for all EU languages. Although the language policy defines the first principle of the language teaching/learning to be the "primary importance of the mother tongue (Language 1)"[5] right now **the school does not seem to receive the necessary support** to fulfill its mission.

Secondary - Three L1 lessons on the same day

While the school management is required to "use all working days efficiently"[6] and assumably "timetabling ensures an equitable distribution of subject time through the week"[7], this requirement is not fulfilled for the L1 teaching. Starting from this year some groups have 3 L1 lessons on the very same day and just 1-2 lessons on other day(s) e.g.: see Annex 2. This does not seem to enhance the continuous learning that should be essential in the case of a compulsory course. The pupils are overloaded with L1-related tasks on one day but virtually do not encounter this subject during the rest of the week.

This is seriously disadvantageous for the studies. As a consequence children are tired and unmotivated, the homework is not spread throughout the week. Students take the triple L1 lessons as "something to survive" instead of participating with enthusiasm. One of the triple lessons can also be a merged lesson therefore it's usefulness is rather questionable.

[5] Language Policy: https://www.eursc.eu/BasicTexts/2019-01-D-35-en-2.pdf

[6] Organisation of studies and courses: https://www.eursc.eu/BasicTexts/2019-04-D-13-en-2.pdf

[7] Quality Assurance and Development in the ES: https://www.eursc.eu/BasicTexts/2000-D-264-en-2.pdf

It seems like certain **ES constraints do not allow the school to hire the staff which is necessary for an appropriate timetable**. These restrictions should be urgently lifted in order to restore the proper way of teaching/learning this important subject.

Primary, Secondary - Organization of L2 lessons, unclear attainment levels, lack of group level differentiation

We are not aware of a regulation which would forbid it, but presumably because of missing support from the governing bodies, the school is not capable of setting up L2 language learning groups with skill level differentiation. As a consequence those students who acquired a relatively high L2 level in the primary school years (because of multilingual family background, SWALS constant immersion of L2 environment or exceptionally good language learning capabilities), learn at the same level and pace as those students who are still beginners and have average/slower learning pace with lower L2 learning targets.

The minimum L2 proficiency levels, set by the language policy, are just an ambition. These levels are not expected to be a strict condition for being promoted. The L2 language lesson groups are trying to fulfill the requirement for advanced and beginner students often focusing on the latter as "common denominator". However at the introduction of these proficiency levels, the Office of the Secretary General explicitly emphasized "that these levels correspond to the 'basic proficiency level' and that **higher performance levels will also be encouraged, aimed at and recognised**"[8] the school does not seem to receive the necessary financial and regulatory support to run **special language learning groups aimed to reach higher levels** in early secondary.

In the first year of secondary school, depending on the language, the students might have to learn from A1, A2 level L2 books, exercises, explanations. E.g. in S1 there could be an L2 lesson about the names of colours, but in another lesson students are expected to write an essay about a complex scientific subject with perfect grammar and spelling. As a consequence these L2 lessons are not very useful for many students. The homework is mainly provided on this level. The students don't receive proper tools (books, teaching programmes) to help understanding complex grammatical structures, subject specific (e.g. science related) vocabulary and difficult conversation situations.

Because of the significant differences between the students in the same group, the L2 assessment system does not provide useful feedback. There is no standardized assessment in place, which would reveal how many students could not reach the minimum levels and how many would require advanced lessons.

[8] https://www.eursc.eu/Documents/2013-08-D-11-en-1.pdf

SWALS students' ability to understand the lesson material, to prove their best on the assessments, can be limited by their L2 vocabulary and capability of using complex grammatical structures. On the other hand, having interesting and motivating language lessons, which would allow students to learn at their full potential with learning continuity is very important for every student, independent from their background. **The language policy has many references to this necessity, but the school does not seem to have the resources** to be

able to organize the support for this requirement.

Primary, Secondary - lack of SWALS L2 support strategy

As described in the language policy "Experience shows that ... progression in competence in Language 2 for SWALS pupils is faster than for other pupils. They often reach the required level of proficiency ... earlier than their peers. Although their level of Language 2 is usually higher than the ones of non-SWALS pupils, they still often need support, as they learn the majority of their subjects in their Language 2 together with native speaking pupils. **Experience shows that their needs in terms of language support are different from those of non-SWALS pupils. Schools are aware of these needs and within their capacities offer remedies to bridge the gaps**."[9]

The ES system provides schools additional funding for SWALS support in form of a dedicated SWALS support budget of "550 euro/SWALS pupil"[10], which could be used for differentiation e.g. to organize "fast track" groups. Despite the recognition of this specific need (besides two exceptions, which involve just a very small number of students in special situations), there are **no specific SWALS L2 support programs in place**. The current practice does consider that with differentiated L2 teaching in some situations it might not be required to provide costly general support lessons, which would save time for both the students and teachers.

Secondary - No contact with the class teacher

Often SWALS have no lessons with their class teacher as the class teacher is the L1 teacher of the class. Luckily most of the appointed teachers are actively looking after the SWALS class members even if this requires additional efforts from them. On some occasions though, the **class teachers are not able to contact the SWALS students** "in the class". The students not having contact with their class teacher are not fully integrated in their class community and do not have a proper follow-up on the school life. We can confirm that there have been situations where a student had no lesson with the class teacher for 5 consecutive years. Parents also reported problems which are the consequence of not having contact with SWALS, e.g the class teacher didn't

[9] https://www.eursc.eu/BasicTexts/2019-01-D-35-en-2.pdf

[10] https://www.eursc.eu/BasicTexts/2019-04-D-13-en-2-ANNEX%20II.pdf

invite them to the parents meeting in September, forgot handing over the end of year school report, did not include SWALS in school trips.

SWALS often do not benefit from this tremendous support that others get from the class teacher. E.g. as defined in the general rules of the ES[11] the class teachers' responsibility is "centralising all information on the progress and conduct of pupils in their class, assisting the Director and colleagues in disciplinary matters concerning these pupils, … (be) the link between pupils' legal representatives (individually or representing the class), the pupil delegates of the class and all the teachers who teach the class." As this link is often missing just as the lessons together with the classmates, SWALS can feel themselves separated from the class community.

Inscription

Learning the mother tongue language is very important for everyone, especially for children of the contractual agents and other temporary personnel, so they can continue their studies at home after they return. There are also families, mainly employees of the EU institutions with permanent contracts, whose children' inscription as SWALS can be a major drawback. Their children are often bilingual because of the full immersion (born in Luxembourg, creche/kindergarten in Luxembourg). These kids' dominant language is rather French or German and not necessarily their mother tongue. One would expect that the European Schools will support these children' integration and welcome them in one of the main language sections. Unfortunately our experience is different. **The enrollment strictly instructs the schools to do a test for dominant language even for bilingual students who would have no problem following the lessons** if they would be enrolled in a language section and thus avoid the difficulties that SWALS have. Bilingual children from EU countries get to be SWALS despite the explicit parents' request, while other families coming from non-EU countries can freely choose the language section as they want, independent of the child's language skills. The school seems to apply the "dominant language" policy only to SWALS. By our experience a child who speaks only German can be freely enrolled into the French language section.

When the decision about the dominant language is not obvious, **the parents should at least have the right to choose for their kids.**

The rules for the dominant language test are not transparent and not necessarily organized according to the language experts' advice. The school requires very young children (less than 4 year old) to speak to different unknown teachers on different days in different schools (only one session with each teacher). The results of such tests are questionable. Parents do not receive the detailed results of the dominant language tests or any proof that the test had actually taken place.

[11] https://www.eursc.eu/BasicTexts/2014-03-D-14-en-10.pdf

According to parents' testimonies not all children are treated equally and there have been cases in which a child (by the omission in administration or a kind of beneficial treatment) was not tested for his mother tongue and thus avoided the SWALS status. **European Schools seemingly decide on the dominant language on the basis of the child's nationality**, not taking into account the child's real dominant language or the opinion of a professional.

Lack of communication and transparency on the SWALS system.

The ES does not inform the parents before the enrollment about the difficulties they will face in the future. None of the above mentioned issues are made clear to parents when choosing the ES. There is not enough information on this complex system. Many families are confronted with the problems of the SWALS systems only when children start the secondary cycle and when it is rather too late to change the school and in any case very stressful for children.

Later on, when children reach certain educational milestones, the parents can have difficulties to understand the consequences of their decision as there are **no clear guidelines or reliable information sources on the SWALS specific rules**. The tasks and the responsibilities of the Educational Support and SWALS coordinators are defined in the documents (2012-05-D-14 Policy and 2012-05-D-15 Procedural document)[12], but **the school does not have a SWALS coordinator**. The parents have to rely on what they get from the class teachers who themselves are also often not well informed.

The rules are unpredictable, and can change year by year substantially for the worse, there is no guarantee for continuity.

The European School system does not provide a clear introduction of the SWALS concept and the local implementation of the SWALS related rules. The schools do not have a guideline or a summary of the local implementation of the general rules.

Beside many other points, transparency on the following points would be required, ideally in one single document:

- Introduction of the SWALS concept
    - advantages/disadvantages of being a SWALS
    - enrollment, dominant language concept and detailed requirements for testing methodology

[12] Internal structures in the nursery, primary and secondary cycles: https://www.eursc.eu/BasicTexts/2019-04-D-13-en-2-ANNEX-I.pdf

- explanation for teachers

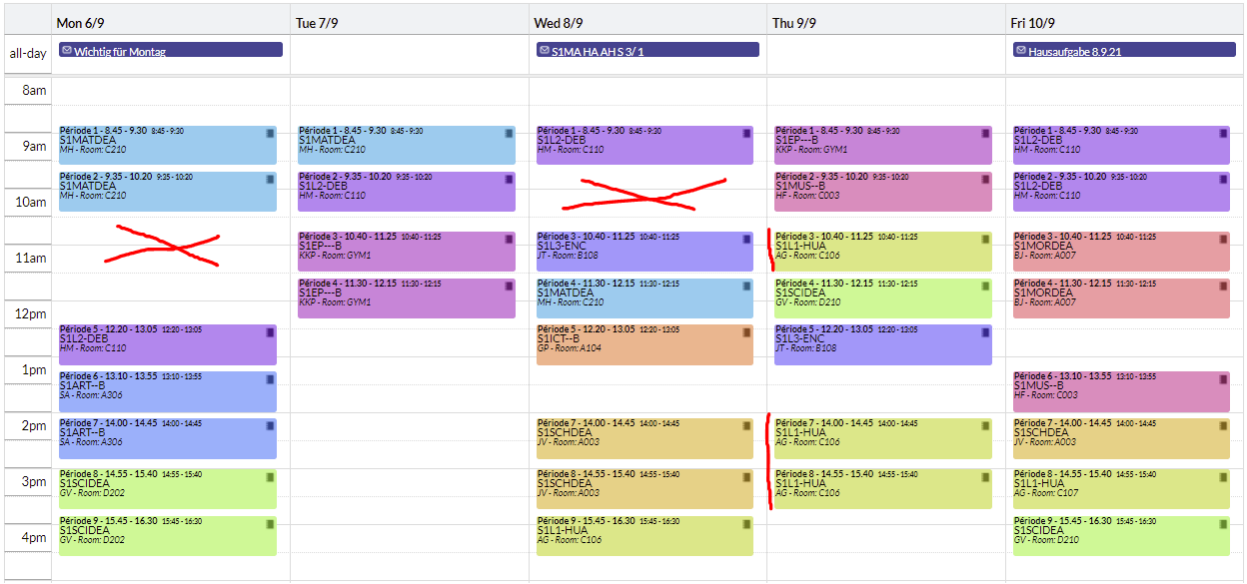
- SWALS L1 teaching concept
  - L1 "compatibility" with the national system (syllabus, BAC), detailed L1 syllabus to be able to follow the lesson plan
  - clear transparent group merging rules with upper limit for group size which considers the highest importance of the L1 studies
  - L1 teacher substitution

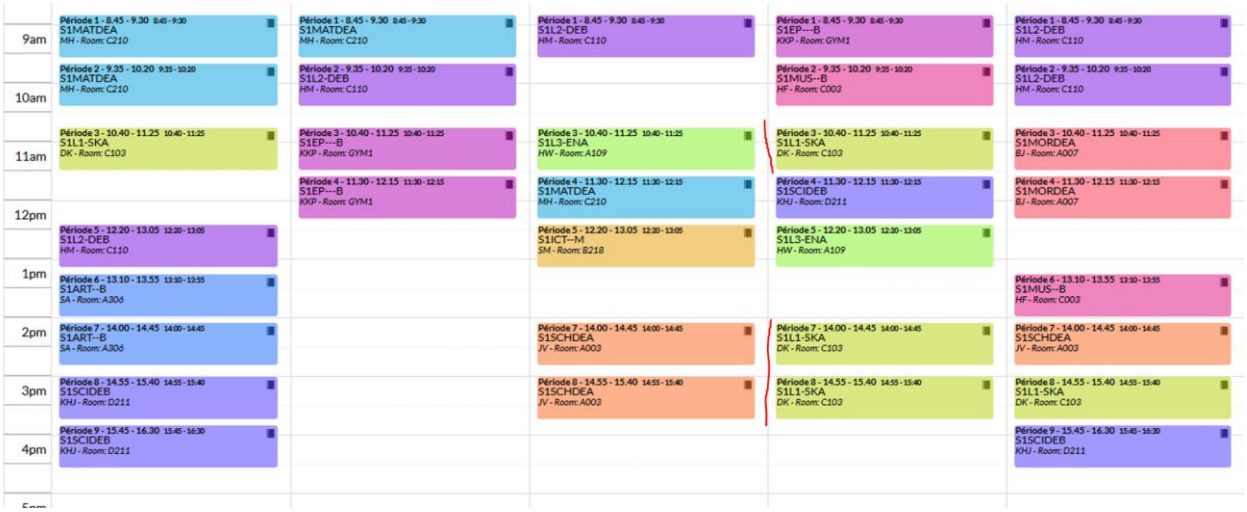
- Timetable differences
  - additional time spent in the school because of mandatory L1 lessons outside of the normal teaching hours
  - potential additional costs
  - gaps and possible options to use this time efficiently

- L2, L3, L4 options for SWALS
  - clear transparent overview on the language options introducing the differences
  - consequence of choosing one or the other language (e.g. English not offered as L4)
  - introduction of the L2 "mixed" teaching concept (advantages/disadvantages) the mixed assessment system, the lack of group level differentiation
  - clear indication of the attainment levels being different from what is defined in the language policy and different what would be ideal for SWALS
  - clear rules on changing L2,3,4 and their consequences
  - L2 support options for SWALS

Annex 2. Secondary Timetable examples

SWALS S1 timetable, triple L1 lesson on Thursday, two mandatory lessons on the free afternoon (no school bus service).





S2 SWALS timetable Monday-Thursday starting with 1 and 2 gaps (no school bus) unbalanced daily rhythm

