



## **Submission to the Consultation on the Department of Education's Statement of Strategy, 2016-2018.**

### **1. Introduction**

The ISPCC welcomes this opportunity to contribute to the Department of Education's Statement of Strategy, 2016-2018.

The ISPCC is Ireland's national child protection charity. In responding to this call for submissions, we have followed the questions asked by the Department of Education. The ISPCC has confined its commentary to areas specifically within the scope of its vision, mission and objective, as defined by its own strategic plan, rather than addressing comments under all the sections outlined. For this reason, not all the questions have been addressed.

Our guiding document with regard to the rights of children in education is the UN Convention on the Rights of the Child, and we have drawn on this document in responding to the call for submissions.

### **2. UN Convention on the Rights of the Child**

#### *Article 28: Education:*

1. States Parties recognize the right of the child to education, and with a view to achieving this right progressively and on the basis of equal opportunity, they shall, in particular:

- (a) Make primary education compulsory and available free to all;
- (b) Encourage the development of different forms of secondary education, including general and vocational education, make them available and accessible to every child, and take appropriate measures such as the introduction of free education and offering financial assistance in case of need;
- (c) Make higher education accessible to all on the basis of capacity by every appropriate means;
- (d) Make educational and vocational information and guidance available and accessible to all children;
- (e) Take measures to encourage regular attendance at schools and the reduction of drop-out rates.

2. States Parties shall take all appropriate measures to ensure that school discipline is administered in a manner consistent with the child's human dignity and in conformity with the present Convention.

3. States Parties shall promote and encourage international cooperation in matters relating to education, in particular with a view to contributing to the elimination of ignorance and illiteracy throughout the world and facilitating access to scientific and technical knowledge and modern teaching methods. In this regard, particular account shall be taken of the needs of developing countries.

### ***Article 29: Aims of Education***

1. States Parties agree that the education of the child shall be directed to:

- (a) The development of the child's personality, talents and mental and physical abilities to their fullest potential;
- (b) The development of respect for human rights and fundamental freedoms, and for the principles enshrined in the Charter of the United Nations;
- (c) The development of respect for the child's parents, his or her own cultural identity, language and values, for the national values of the country in which the child is living, the country from which he or she may originate, and for civilizations different from his or her own;
- (d) The preparation of the child for responsible life in a free society, in the spirit of understanding, peace, tolerance, equality of sexes, and friendship among all peoples, ethnic, national and religious groups and persons of indigenous origin;
- (e) The development of respect for the natural environment.

2. No part of the present article or article 28 shall be construed so as to interfere with the liberty of individuals and bodies to establish and direct educational institutions, subject always to the observance of the principle set forth in paragraph 1 of the present article and to the requirements that the education given in such institutions shall conform to such minimum standards as may be laid down by the State.

### **3. Responses to Questions posed by the Department of Education's Consultation**

How well does the Education service meet the needs of children and students?	
1 (a)	<p><i>What improvements can be made within existing resources</i></p> <ul style="list-style-type: none"> <li>Children are the primary consumers of the education system. The voice of the child must be heard when decisions on delivery of education are being made, from a legislative and policy level right through to decisions made in schools. Although there are some excellent examples of good practice in the area, in our experience, the structures for listening to children, seeking their views, including their ideas and implementing their feedback are often non-existent in educational settings.</li> </ul>

The single most effective way to protect children, as well as to enhance their experiences as users of the education system, is to ask them their views and listen to them. Requiring schools to have formal, instituted consultation measures which encourage feedback on school practices, policies, the education system, the curriculum and would reap benefits for schools as well as for educational system. We acknowledge that some schools have excellent structures in place to include students appropriately in decision making and to listen to their views, such as student councils which are effective, and that good models of child consultation and participation exist, but this is not the standard experience. A more open system which requires student input would be a significant step forward in enhancing the education system.

- Full implementation of Children First legislation and consistent monitoring of its impact within the education system is key to ensuring schools play a proactive role in keeping children safe.
- Enhanced programmes of wellness with the focus on the development by children of coping skills and resilience. Programmes which support children to build resilience, tackle issues that face them and cope well with educational, family and life stresses should be an intrinsic part of wellness education.
- Enhanced choices for children and their parents in the patronage and ethos of schools. Article 14 of the UN Convention on the Rights of the Child states that *State Parties shall respect the right of the child to freedom of thought, conscience and religion*. The provision of a range of different schooling options, so that children of all religions and of none can freely access education, without experiencing direct or indirect discrimination, or being made to feel different in the classroom or during the school day, must be a priority.
- Ensuring the curriculum prepares children for all aspects of life. Social, personal and health education (SPHE) must ensure that children receive guidance and education at key life stages. The ISPCC works with thousands of children each year who are concerned for their safety and well-being – including online – and who would benefit from greater discussion at school on concepts such as autonomy, privacy and consent.
- Introduction of measures to educate children in cyber wellness and online safety. Online safety is a huge and growing child protection issue. As more and more schools use technology in the classroom, the need to inform children and parents and empower them to be safe online grows. The introduction of modules that support online safety and focus on the educational resources available on the internet while empowering children to be safe is essential. The ISPCC has called for a national cross departmental

strategy to ensure the safety of children online. The Department of Education has a key role to play at policy level and in introducing guidelines and resources for schools to enhance capability and understanding in this key area of child protection.

*1(b) What improvements can be made through new provision*

- Article 28 states that *member states shall make primary education compulsory, and free for all.*
  - While in Ireland primary education is ostensibly free, the cost of putting a child through primary education has been well documented by our colleague organisations. The ISPCC supports the call for real free primary education for children in Ireland.
- The role of guidance counsellors and other pastoral care supports in the delivery of essential support services to children and young people in schools must be recognised. The diminution of the service of guidance counsellors of recent years should be reversed, and a strategy for improving supports on building for future life, coping skills, assistance with future decision-making and career guidance must be developed. While the exact nature of supports can vary along with schools' ethos, the level of support available to students should not vary based on this.
- The encouragement of innovation to reach out to children whose learning and support needs require the use of non-traditional methods. Flexibility, additional resources and the employment of a range of different teaching methods for children who require additional support or non-traditional teaching methods or environments should be encouraged through innovation schemes.

*3. Comment on work currently being undertaken by the Department in your area of interest and/or expertise. (What are we doing well, what could we do better?)*

Child Protection

The implementation of the *Child Protection Procedures for Primary and Post-Primary Schools* and the implementation of the Children First requirements requires ongoing, and continued evaluation. Reporting and monitoring of this is essential. The ISPCC's experience is that the level of child protection and Children First training received is not uniform and that there is scope to ensure that standards are fully implemented across the board. The ISPCC has experienced uncertainty among some schools in relation to the making of referrals. Ensuring standardised approaches and information sharing is essential.

As a whole of Government approach, the full implementation of the Children First legislation is essential to ensure that all organisations dealing with children are adhering to the required standard.

Responding to and preventing Bullying: The publication in 2013 of the Department of Education's Action Plan on Bullying, which gave way to the publication of *Anti-Bullying Procedures for Primary and Post-Primary Schools* was a very welcome and long overdue development.

There were 12 Recommendations set out in the Departments of Education and Skills' 2013 *Action plan on Bullying*. Each recommendation had an assigned timescale for completion. It is important that the progress of these recommendations is reviewed so that we know they have been fully implemented.

The ISPCC has been very active in the area of preventing and responding to bullying, using its own *Shield My School Programme*; an anti-bullying initiative aimed at schools, youth groups and clubs to assist in the community-wide response to the issues of bullying behaviours. The *Shield my School* toolkit also continues to assist schools to reflect on and amend their policies to comply with the Department of Education and Skills' own anti-bullying procedures. The ISPCC has worked with many schools who have demonstrated very proactive and innovative approaches to responding to and preventing bullying behaviours.

On the publication of the procedures it was stated that all schools were obliged to adhere to the policies and procedures therein within a specific time period. What was not and is not clear however is what the consequences would be should a school fail to do so. It is unclear whether monitoring is ongoing regarding the compliance with these mandatory procedures.

The ISPCC would like to see a review taking place of the *Action Plan* as a whole, to examine the progress of the implementation of the actions set out and to ascertain whether further areas should be added for attention.

#### Teacher Training and Support re: Coping with Bullying:

The complex and challenging dynamics of bullying need to be adequately explored for all teachers as part of their initial training. Those educating the children and young people of Ireland need to be fully equipped and skilled to deal with the issue.

#### Relationships and Sexuality Education

The ISPCC through its Childline service receives interactions on a daily basis from children who are concerned about issues relating to sexuality and relationships. There is a clear need for improved guidance and education in this area. It appears that schools in Ireland are still free to

deliver Relationships and Sexuality education according to their ethos, with some opting for abstinence-only models and others offering a more comprehensive programme. As noted above, the ISPCC receives contacts consistently from children who are concerned about their online safety, or whose behaviour online and lack of knowledge of privacy is a cause for concern. We need to review the effectiveness of the current model of sexual education in Ireland. The current approach is not sufficient to prepare children and young people with the reality of life in today's society. Critically we need to equip young people with the knowledge they require to be safe, and ensure that the issues young people are facing e.g. exposure to pornography, sextortion, sexting are covered in any such curriculum. Students need to be able to access high quality comprehensive sex education that supports them and gives them the knowledge and skills they need to be safe and meets their needs in the modern world.

### Links Between the Education System and Mental Health Supports

It is the experience of the ISPCC that teachers and SNAs often need extra support and guidance from Child and Adolescent Mental Health Services in how best to support students with a mental health diagnosis. Such support is not consistent, and a basis for structured support with access for teachers to support and training would be of benefit to the students, teachers and school communities.

*3. Are there opportunities (e.g. new areas of work) which the Department should consider when developing the 2016 - 2018 strategy which would advance the achievement of our mission, vision and objectives across the continuum of education and skills?*

- A strategy for listening to children and involving them in the development of policy and practice in education, including curriculum development.
- Increased focus on well-being and social skills. The need for children to have greater access to life skills preparation and resources to support them to build coping skills and resilience.
- Introduction of measures to educate children in cyber wellness and online safety. As more and more schools use technology in the classroom, the need to inform children and parents and empower them to be safe online grows. The introduction of modules that support online safety and focus on the educational resources available on the internet while empowering children to be safe is essential.

*4. How should success on achieving our strategies be measured?*

In all cases of measuring progress, first there must be clearly defined and mapped out goals with an action plan and time frame in place. A period of review should also be included in the action plan and this review can serve as measure of success, according to goals achieved.

Any review relating to services provided for and with children and young people should include this cohort in its process.

Standardised evaluation tools and measures should be implemented, and training in the use of these must be provided. Openness is key to ensuring a useful, trusted method of progress measurement, with hard and soft data made available, and timeframes and key milestones and evaluations made public through regular reporting.

*5. Comment on any issues relating to the continuum of education and skills, in addition to your particular area of interest and/or expertise.*

*6. Any other observations that you would suggest the Department should consider in the formulation of our strategy for education and skills 2016 – 2018*

It isn't clear how this consultation process is directly involving children who are currently using the education system to establish their views and incorporate those views into this strategy. If this is not already planned, a specific tailored consultation which asks children what they would like to see included in the strategy should take place. If this has not been included in the schedule, it should form one of the first actions of the strategy, with additions/amends to the strategy made on foot of the consultation. It is imperative that the voice of children, as the end-users of the service for which this strategy is derived, is heard clearly in its development, monitoring and implementation.

## **1. Prioritising Early Years**

*(a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

Overall the approach contained in the *Programme for a Partnership Government* is very positive with key areas such as childcare, parental leave, mental health and speech and language targeted for investment and improvement. ISPCC particularly welcomes the introduction of an Early Intervention and Prevention Unit and a National Parenting Support Plan.

In addition to the programme as stated ISPCC wishes to highlights additional key areas identified as requiring attention:

Dedicated Child Health Service – as stated in the *Programme for a Partnership Government*, ‘the first 5 years last a lifetime’ (Pg. 75); however, the effects of early experiences are evident long before the child starts school. There needs to be an increased focus on the provision of parenting support particularly in the first year of life. The current ‘cradle to grave’ health system approach is insufficient to meet the parenting support needs of the 70,000 new births each year. A targeted home visiting and centre based parenting support service would ensure that parents are equipped to deal with common childhood issues in a positive way before an issue arises. It is critical to highlight that the current generation of parents are the first to use a psychological method of parenting in a welcome move away from slapping and physical punishment. In order for the long-awaited legislation in relation to physical punishment to have a positive impact on children’s lives the necessary supports must be put in place to respond to parental concerns in a positive, proactive and preventative manner.

*1 (b) How should progress on Prioritising Early Years be measured?*

The progress on Prioritising Early Years must be measured using a structured standardised method similar to the evaluation of any programme or intervention. Key to this is the identification of the purpose and objectives, targets and key performance indicators established for early years. The evaluation needs to be built into the programme for improvement at the beginning with clear standardised measures of assessment and evaluation. It is critical that all relevant practitioners are provided with sufficient training and support to enable them to understand, adopt and comply with any changes in Early Years. Openness is key to ensuring a useful, trusted method of progress measurement, with hard and soft data made available, and timeframes and key milestones and evaluations made public through regular reporting.

*1 (c) What would you consider to be the priority actions and outcomes in this area?*

Key priority areas are the availability of parenting support and access to health, educational and psychological support services for children and parents. The introduction of a Prevention and Early Intervention Unit is welcomed however unless there is an increased availability and access to assessment and support at a much earlier stage services will continue to treat children at a more advanced stage of difficulty.

## **2. Tackling Disadvantage**

*2 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*



Plans to publish a new School Completion Strategy are positive however it is not clear who will be involved in the drafting of this strategy. It is imperative that relevant young people are consulted on this matter and given the opportunity to express their views and ideas and for these views to be given due consideration when finalising the strategy.

*2 (b) How should progress on Tackling Disadvantage be measured?*

In all cases of measuring progress, first there must be clearly defined and mapped out goals with an action plan and time frame in place. A period of review should also be included in the action plan and this review can serve as measure of success, according to goals achieved.

Any review relating to services provided for and with children and young people should include this cohort in its process.

Standardised evaluation tools and measures should be implemented, and training in the use of these must be provided. Openness is key to ensuring a useful, trusted method of progress measurement, with hard and soft data made available, and timeframes and key milestones and evaluations made public in regular reporting.

*2 (c) What would you consider to be the priority actions and outcomes in this area?*

### **3. Diversity and Choice for Parents**

*3 (a) Comment on the approach contained in the Programme for a Partnership*

*Government (are we capturing the essential issues, are there additional matters we should take into account?).*

#### **Need to ensure equal access to education and to prevent discrimination of children based on religion or other factors**

The ISPCC welcomes the recognition in the *Programme for a Partnership Government* that a dynamic and innovative education system is needed in order to meet the needs and realise the rights of both parents and children to access multi-denominational, non-denominational or denominational schools as desired. Equal access to education must be a priority for all children, regardless of their religious or non-religious belief. Policy discussion and debate on education reform has focused on how schools operate, on parental choice, and on the decisions taken by governors; as well as institutions, laws, policies, frameworks. However this must not be to the exclusion of children's voices as each child is an individual human rights holder. Every child has the right, set out in international treaties, to freedom from discrimination. States must take all appropriate measures to protect the child against all forms of discrimination; this includes not allowing a child to be denied access to a publicly funded school due to his or her religious or non-

religious belief. All children have the right to freedom of thought, conscience and religion. It is imperative that whatever a child's religion or non-religion, the education system is based on principles of diversity, mutual understanding and tolerance.

The UN Committee on the Rights of the Child recommended in February 2016 that “... the State party ensure accessible options for children to opt out of religious classes and access appropriate alternatives to such classes, in accordance with the needs of children of minority faith or non-faith backgrounds”.

### Role of Ombudsman for Education

On the point regarding the planned examination of the role of an Ombudsman for Education, the ISPCC agrees that a mechanism for complaints, decision-making and accountability is required, however this could take many forms. A clear pathway for complaints from both parents and children is needed.

Almost half of all complaints received by the Office of the Ombudsman for Children (OCO) are related to education. Those complaints related to the handling of allegations of inappropriate professional conduct of teachers and school staff are precluded from investigation by the OCO. The OCO has highlighted that there is no alternative avenue for such complaints in the absence of Part 5 of the Teaching Council Act (2001) being commenced; commitment in the Programme for Partnership Government to commence this Part is welcome.

Complaints relating to education and educational settings one could assume will often involve children (based on the figures from OCO), therefore whatever mechanisms are put in place must allow for children to complain and speak on their own behalf. While in many cases parents will be making such complaints on their child's behalf, it is imperative that the child be given the opportunity to give their own views and access the complaints mechanism, as individual rights holders. Clarity on the role of such an office and its interaction with the Ombudsman for Children's office, and how the voice of children would be heard, must be provided.

### *3 (b) How should progress on Diversity and Choice for Parents be measured?*

In all cases of measuring progress, first there must be clearly defined and mapped out goals with an action plan and time frame in place. A period of review should also be included in the action plan and this review can serve as measure of success, according to goals achieved.

Any review relating to services provided for and with children and young people should include this cohort in its process.

Standardised evaluation tools and measures should be implemented, and training in the use of these must be provided.

*3 (c) What would you consider to be the priority actions and outcomes in this area?*

#### **4. Promoting Excellence and Innovation in Schools**

*4 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

*4 (b) How should progress on Promoting Excellence and Innovation in Schools be measured?*

*4 (c) What would you consider to be the priority actions and outcomes in this area?*

#### **5. Promoting Creativity and Entrepreneurial Capacity in Students**

*5 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

*5(b) How should progress on Promoting Creativity and Entrepreneurial Capacity in Students be measured?*

*5(c) What would you consider to be the priority actions and outcomes in this area?*

## **6. Making Better use of Educational Assets within Communities**

*6 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

*6(b) How should progress on Making Better use of Educational Assets within Communities be measured?*

*6(c) What would you consider to be the priority actions and outcomes in this area?*

## **7. Special Needs Education**

*7 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

*7(b) How should progress on Special Needs Education be measured?*

*7(c) What would you consider to be the priority actions and outcomes in this area?*

## **8. Meeting the Skills Needs of the Future**

*8 (a) Comment on the approach contained in the Programme for a Partnership Government (are we capturing the essential issues, are there additional matters we should take into account?).*

Including enhanced computer science skills in the curriculum will have an impact in meeting the skills needs of the future, including in enabling children to be safer online and in their use of

technology. This is to be welcomed. Online safety should be a key component of computing skills curricula.

Future skills development should acknowledge the importance in adult life of developing appropriate coping and resilience skills, which can be supported through wellness modules. The need to enhance mental health and wellness practices and skills among students while in education to build lifelong positive habits must be recognised as a future skills need.

*8(b) How should progress on Meeting the Skills Needs of the Future be measured?*

*8(c) What would you consider to be the priority actions and outcomes in this area?*

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