



## **JMB Submission to DES on a New Statement of Strategy from 2016-2018**

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### **Introduction**

The Joint Managerial Body/Association of Management of Catholic Secondary Schools (JMB/AMCSS) welcomes the development by the Department of a new Statement of Strategy for the period from 2016-2018 and is grateful for this opportunity to present a submission.

### **Who we are**

The Joint Managerial Body (JMB) was founded in 1964 to represent the interests of all voluntary secondary schools in the Republic of Ireland. It is the main decision-making and negotiating body for the management authorities of almost 380 voluntary secondary schools. The JMB comprises two founding organisations: AMCSS, the Association of Management of Catholic Secondary Schools and the ISA, the Irish School Heads' Association, representing the Protestant Schools in the State.

### **Framework of this Submission**

Our contribution to the development of the Statement of Strategy will track the main themes underpinning the Programme for Government and will open by addressing the overarching questions set-out in the consultation framework.

## **1. Meeting the needs of students - priorities for improvement**

### ***Resources***

While pressures on the state's finances are undeniably real, there is yet another unassailable argument - the internationally acknowledged reality that euro for euro, dollar for dollar, investment in education pays off in multiples in short, medium and long terms. A well-resourced, efficient and effective educational system provides:

- A workforce attractive to domestic and outside investors and employers
- Social cohesion, transmission of strong moral and citizenship values
- Fuller democratic engagement
- High levels of school retention and progression to further education
- Crime figures reduced
- Schools engaging with and supporting whole families, often remediating and supporting non-existent or depleted social support resources
- Community development
- Engagement with and development of sport of all codes across the country

- Cultural enrichment
- Promotion of inclusion while celebrating diversity
- Value for money
- Source of employment for graduates and a range of other workers
- Source of highly compliant revenue return for VAT, PAYE etc.
- Vital support in the full integration of newcomer students and their families

In particular our schools, in the most cost effective way imaginable, both mitigate and remediate disadvantage. Schools in our sector have a proud history of enhancing inclusion and participation by children, young adults and, indeed, whole families in a life-enhancing engagement with learning and social enrichment. If current trends continue however, the cost of short-termism in educational disinvestment will be staggering. It costs €77,222 to keep a single prisoner for one year and the stark statistic that 90% of prisoners in the State are early school leavers should speak for itself.

Another stark reality is the fact that Voluntary Secondary schools are forced to raise an increasing proportion of their annual expenditure through fund-raising and parents' contributions, and this at a time when family employment and incomes have also suffered attrition. The situation is even more difficult when one realises that in the case of the average 400 pupil school, a Voluntary Secondary school inexplicably continues to receive €90 per pupil less each year than a comparable Community and Comprehensive school and €212 per pupil less than a Vocational school.

Meanwhile, cuts to frontline services have already been severe. It is important, however, that the reality of these reductions to school resourcing is acknowledged by policy makers and that, for example, cuts to SEN resource hours are no longer touted as, for example, 'a loss of just 6 minutes per child per week', when in fact it means a *real* loss of whole and/or part specialist teachers to a school. The reality of the so-called '6 minutes per child per week' also means that the low incidence child in our schools receives 25 hours per annum less support than she/he did before the cuts. The same is true of guidance and counselling provision which must surely represent the most fiscally and socially counter-productive and short-sighted cutback of the entire recession in Ireland.

It is the business of DES to maintain educational services at national and system level and of school management to do the same at the level of the school. Our perspectives are therefore different, though ultimately we both serve the needs of a generation of children and young people as well as their families.

In short, our schools, and school management in particular, are doing an incredible job in providing a world-class, values-rich, broadly-based and liberal education on a shoestring. We have been under-resourced for too long. The new Minister must not have to fight for realistic resourcing at the cabinet-table – he should expect it.

### ***Priorities***

The JMB has identified seven key priorities for the enhancement of education provision to this generation of students in our schools:

### ***Priority 1: The Provision of Adequate Staffing in Voluntary Secondary Schools***

Ireland already has a higher ratio of students to teaching staff at secondary level than the European average<sup>1</sup>, higher compulsory instruction time per student per year<sup>2</sup> as well as a significantly higher number of hours teaching time per year per teacher (735 hours compared to an OECD average of 664 hours at senior cycle). Ireland nonetheless has one of the highest secondary school completion rates in the world at 89%, while the average school completion rate for OECD countries is 83%. If the JMB were to identify a government priority for recovery, it would therefore be the restoration of our seriously eroded staffing schedules.

### ***Priority 2: Provision for Educational Disadvantage***

The recent ESRI report on DEIS proposes a degree of tapering of supports for schools rather than a sharp withdrawal below the specified cut-off. Aligning with the broadening of provision in the programme for government, JMB supports such a proposal and also seeks to have comprehended those larger schools with high absolute numbers of disadvantaged students, as opposed to proportion. This is not to deny the existence or impact of the ‘multiplier effect’. What, in all justice, is required is a good-faith attempt to map resourcing against need, even though this will emerge as being more complex than heretofore. There is nothing as unequal as equal treatment. The social map of Ireland has been transformed by the recession. A ‘new poor’ has emerged and they don’t necessarily have medical cards; they are struggling to keep their homes but they prioritise education for their children and any new roll-out of provision must take cognisance of these realities.

### ***Priority 3: The Provision of Adequate Funding for Voluntary Secondary Schools***

Successive waves of cuts, aligned with a pre-existing funding deficit mentioned earlier, result in individual schools in our sector uniquely having to raise over 30% of their annual expenditure through fund-raising and voluntary contributions from parents. Economically, morally and probably constitutionally, this blight on the landscape of post-primary schooling is now completely untenable.

To add to the unequal treatment of children and young people attending voluntary secondary schools, the demand that schools in our sector continue to pay the incremental component (‘basic salary’) of their teachers’ salaries from school funds is incomprehensible. The JMB has received assurances that this historically anomalous practice would be discontinued but it remains in place and costs a school with 30 teachers a staggering €16,875 per annum. The DES Secretary General’s recent declaration that ‘if funding comes available’ for changing current policy fails to provide any clarity of intent or even a reassurance that the Minister is serious about equalisation.

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<sup>1</sup> Education at a Glance 2013: [http://www.oecd.org/edu/Ireland\\_EAG2013%20Country%20Note.pdf](http://www.oecd.org/edu/Ireland_EAG2013%20Country%20Note.pdf)

<sup>2</sup> DES: <http://www.education.ie/en/Publications/Statistics/Education-at-a-Glance-OECD-Indicators-2013-Key-Facts.pdf>

#### ***Priority 4: The Workload of Principals***

Principals in our sector labour under an oppressive workload due to increasing legislative, regulatory, fiscal and administrative demands as well as the serious challenges arising from radical, and not always positive, societal change. The response of government to this crisis has been to dismantle the scant support school management already had, while at the same time severely reducing resources for education in the form of staffing, grant-aid and support service cuts.

Addressing the serious issues of role clarity and personal-professional capacity requires two concurrent developments, each within the scope of the Department to initiate immediately:

1. Provide time to allow for the embedding for the raft of initiatives already overwhelming school leaders, and,
2. The middle-management proposals initially developed by the JMB and subsequently finalised and supported by all three management bodies must be implemented without delay.

#### ***Priority 5: Special Educational Needs***

Before moving to a system-wide new model of allocation, the Department must restore the quantum of hours to schools and the system as a whole to at least the pre-2010 allocation figure. Government must recognise that if a student with a low-incidence, enduring and/or profound condition is recommended by a professional to receive 5 hours of focussed support, that this is precisely what, at the very least, should be delivered and not the current 4 hours 15 minutes.

Meanwhile, the JMB, and specifically our pilot-school principals, have repeatedly asserted the need for a dedicated post of SEN Co-Ordinator (SENCO) in every school. The JMB is seeking that the Department immediately provides for SEN Coordinator functions with an allocation of 10% of the new-model profile hours as an additional allocation of SENCO time-for-duties to each school.

#### ***Priority 6: ICT in Schools***

The aims of the new Digital Strategy will only be realised if a medium-term policy framework incorporating new fiscal realities is put in place with ring-fenced funding and a timeframe for delivery, agreed with the education partners. This will require a 5-year framework for resourcing ICT provision and support at school level in order to allow for planning and purchasing. Though promised in the Strategy document, a multi-annual funding commitment has failed to emerge.

The development of purchasing frameworks for a range of infrastructural essentials such as Wi-Fi, but without any linkage to grant-aided or annualised funding, simply generates a sense of despair among school management. Meanwhile, the funding previously provided for school administration packages ended over two years ago. Schools now have to fund this software from their own resources, a situation which should be addressed as a matter of urgency.

## **Priority 7: School Buildings**

In successive programmes for government, including the current plan, the elimination of prefabricated classrooms has been specifically identified as a national priority yet, along with the provision of an annual capital budget to schools, this too has failed to materialise.

JMB welcomes the Minister for Education's announcement of 28<sup>th</sup> April 2016, approving a €30 million investment under the Summer Works Scheme 2016-2017. The JMB urges the Department to make a second round of allocations as soon as possible in 2016 and that the 2017 allocation of €40 million be announced in a timely manner. Meanwhile, the JMB has prioritised the provision of sports halls as a key objective and carried-out significant research on such amenities in our schools indicating that over 50% of our schools do not have adequate, or indeed any, sports hall facility.

## **2. Comment on work currently being undertaken by the Department in your area of interest and/or expertise.**

The Department, like every other body, operates within a range of changed and changing contexts, some of which represent opportunities for innovation but most of which negatively impact on the capacity of agencies to carry-out their mission. JMB sees the following environmental and school leadership factors as requiring the Department's attention in the development of its medium-term strategies:

- Public financial constraints and the impact on education
  - *Education budgets successively cut with limited restoration*
- Ireland: A low trust society
  - *Educational leadership has, however, retained civic confidence*
- Changing stakeholder expectations
  - *'Doing more with less' – a failing discourse*
- Public sector reform
  - *Public service agreements leading to a transformation of established practices*
- Changing strategic alliances
  - *Relationship-building and inter-organisational cooperation now essential*
- Demographic change
  - *Increasing population and social diversity*
- Curricular change
  - *The teacher as learner and enabler: Principal as motivator and facilitator*
- System demands impacting on service need: advice, information training and support
  - *'Whole School' paradigms: New Junior Cycle, SSE, Literacy & Numeracy etc.*
- Increased customer demand and a renewed focus on client service provision
  - *The twin aims of effective agencies 'Service and Leadership'*
- Focus on integrating technologies
  - *Purposeful, integrated digitisation*
- Requirement for adaptability and flexibility
  - *Making existing structures even more responsive*

Such a list of challenging external and internal environmental factors can either paralyse or stimulate an organisation. DES has demonstrated a capacity to consult widely and adapt to changing circumstances while clearly trying to retain its focus on the core mission of ‘enabling learners to achieve their full potential...’<sup>3</sup>

That said, there are, from the perspective of voluntary secondary school management, two key issues JMB would wish to see addressed in the Department’s strategy:

### *Improving Quality and Accountability*

The advent of a complete new suite of evaluation strategies by the Inspectorate means that Irish schools must be among the most externally inspected schools in Europe. The holy grail of evaluation, however, is for responsible self-evaluation to underpin decision-making at school level and for the Inspectorate to provide an advisory and support role in this.

Recent meta-analysis<sup>4</sup> research into ‘what works’ in teaching and learning and the effect size of various factors in schooling, elicited the following list as the top ten factors impacting on students’ learning outcomes:

1. Student self-assessment/self-grading
2. Response to intervention
3. Teacher credibility
4. Providing formative assessments
5. Classroom discussion
6. Teacher clarity
7. Feedback
8. Reciprocal teaching
9. Teacher-student relationships fostered
10. Meta-cognitive strategies taught and used

If valid, this research points to the greatest influence on learning as being sited in the classroom, with teacher effectiveness lying at the heart of the achievement of successful outcomes for young people.

The DES must therefore align everything it does with these findings. We need someone at the ‘top’ of the education policy-making pyramid to have the complete picture. At present the Department is heavily siloed. One section doesn’t speak with the other on an effective basis. The fractured implementation of the junior cycle framework is evidence of this, as is the rushed early work on the new model of SEN allocations. In fact, the only people in the country who operate at the centre of the nexus of policy-overload are our principals, who must implement everything. To support a more realistic and grounded policy framework, JMB urges the Department to develop a model of structured input from people with school management experience and to ensure that every major decision is ‘road-tested’ by those charged with its implementation. The lack of inspectors with school management experience is a case in point. DES should use the secondment process, with retained allowances, to boost its school-management perspective and this will represent a small amount of money well spent.

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<sup>3</sup> Overview of Service Delivery and Reform, DES (2014)

<sup>4</sup> Hattie, J. (2009) Visible Learning

Meanwhile, JMB is extremely conscious of the workload of its principal members and makes a plea for a five-year pause in the relentless imposition of disconnected policy imperatives landing on the desks of overwhelmed school leaders. The moratorium on appointments to posts of responsibility has placed exponentially increasing demands on already overburdened school principals adding to a gap in the middle management function of schools. People and procedures are now at breaking point. Over 70% of principals in our sector have not completed a five year cycle at this point. In the light of such developments, immediate steps must be taken to begin to put our middle-management framework in place and the proposals deserve a place in the Department's strategic plan.

To summarise, you cannot have quality or accountability without adequate resourcing. JMB will be happy to engage with DES officials at any and every level (as we currently do) to specify what is needed in terms of staffing, administration capacity and other resources to ensure our secondary school system becomes more effective and sustainable for all concerned.

### *Building the Right Systems and Infrastructure*

The most common frustrations encountered by JMB in its high-level dealings with DES relate to the effect of siloing, as mentioned earlier. One section does not engage with the other. One computer system is incompatible with another. One sub-unit is unaware that another sub-unit is making demands on schools at the same time. Everyone is under pressure and nobody has the overall picture.

Ministers are, by definition of their role, transitory. A key strategic priority for the Department must be to put in place an oversight structure with both a mandate and authority to take an overall view of policy and practice developments and attack both the incoherence and overload impacting on our schools. Its primary function must be to map system capacity against policy priority. We cannot have 'joined-up thinking' if no-one is responsible for doing this thinking. If it is everyone's responsibility, it is no-one's responsibility.

In terms of infrastructure JMB urges DES to align its ICT network to allow for a portal approach to enhancing intra-departmental communication and public information-access capacities and to review its website design, particularly in terms of its search engine and intuitively simplifying access to Circulars.

### **3. Are there opportunities (e.g. new areas of work) which the Department should consider when developing the 2016 - 2018 strategy?**

The future of the voluntary secondary school and the role of denominational schools is a matter of serious concern, particularly in light of the pressures on small schools to survive both from the point of view of the curriculum and financially. The JMB has serious concerns in relation to the impact that a revised Schools Admissions Bill will have on the future of many schools and, while the legislative framework will be monolithic, it is within the regulatory framework that much of the detail will be mandated. JMB seeks to have its perspectives on enrolment comprehended in advance of any implementation and asks that the Department include ongoing consultation on a bilateral basis comprehended in its strategic planning on this issue.

In terms of forward planning, other emerging developments include:

- *Board of Management Training:* Under the provisions of the Education Act 1998, the board of management is the body charged with the direct governance of a school. In recognition of the responsibility which the Education Act has imposed on Boards of Management and the increasingly complex environment in which they must operate, the JMB emphasises the need for the DES to provide a realistic grant for the provision of board of management training in order to support the training and development of the voluntary members of our boards of management in the discharge of their duties and consistent with national and DES priorities. The 2016-2022 budgetary provision by the Teacher Education Section of the DES works out over the next four years as €50 grant per year per board of management across primary and post-primary sectors. This is not a realistic budget. The JMB would welcome engaging with the DES to negotiate a properly resourced training grant for Boards of Management in order for the boards to meet its functions under the Education Act 1998.
- *State Examinations:* Two initiatives which would immediately impact on student learning and wellbeing should be considered as a matter of priority:
  - (a) Scheduling SEC language oral examinations in the Easter break would save significant teaching-time and costs to the state, and,
  - (b) Releasing the Leaving Certificate results concurrently with CAO offers would significantly reduce the stress on young people and their families
- *LGBTI Developments:* An ambition under the Programme for Government under ‘Justice and Equality’, is that ‘*we will develop an LGBT Youth Strategy that will encompass education, youth services, mental health and other issues. As part of this strategy, we will review implementation of the National Action Plan on Bullying in our schools*’. JMB supports this proposal and will continue to work with DES and our advocacy partners on this issue.
- *Workplace Health:* JMB participates in the working group of the Integrated Workplace Health Management Initiative (IWHMI) which has the support of all the unions and management bodies. We feel that this project is worthy of consideration for funding by DES.

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

Most of the important things in life cannot be measured. Voluntary secondary schools are caring and inclusive communities. They have adapted to demographic change with significant net migration into Ireland and have led the way in integrating the ‘new Irish’ into local communities. They have been leaders in areas such as special needs, social inclusion and Traveller education. Our schools need no lectures on enterprise, efficiency and effectiveness as they have been labouring under a funding regime which ranks Ireland in 30<sup>th</sup> place out of 33 OECD countries in terms of expenditure on education and 27<sup>th</sup> place out of 29 countries when it comes to per capita investment in each second-level student. In short, we have been providing world-class teaching and learning at bargain basement cost to the state and every performance indicator, internal and international, points to the teaching profession and the management of our schools as a national treasure.



The present intention to re-focus the education system on a new set of priorities must avoid an emphasis on solely process and output measurements. It is essential that the Minister's strategy does more than create the *impression* of decisiveness in action. Like so many strategic plans, audit-based innovation programmes and accountability measures before it, this otherwise worthwhile project will falter if it:

- Fails to secure the confidence of teachers
- Does not acknowledge the centrality of the teacher-pupil relationship in the educative process
- Does not achieve change at classroom level
- Fosters dependence and external compliance, especially from school leaders
- Leaves school difference unacknowledged while threatening schools with publication of outcomes, or,
- Diverts scarce resources to monolithic, standardised assessment measures undermining the professional status and moral authority of teachers

Proposals to enhance the professionalisation of the teaching profession are welcome at any time but the potential for demoralisation in the prevailing atmosphere in Ireland wherein public servants, having accepted pay-cuts and deteriorating work conditions have received little by way of affirmation or public support from their political masters. If we are to continue to attract the 'brightest and the best' to the profession, it is essential that teachers are supported and affirmed by both the institutions of state and the community at large.

Attention to the school-leadership reform agenda is equally urgent. Principals are hired, in the first instance, as creators of a learning culture within their schools. The great frustration is that we spend so little of our time at this core task due to an ever-increasing workload, the lack of administrative support, a shrinking middle-management structure and the struggle to fundraise. Nonetheless, principals still manage to dedicate much energy to the essential activity of leading and enhancing learning for *every* member of their school community.

The term 'Leadership' does not take on new meaning when preceded by the word 'Teacher'. The development of a collaboratively formed, authentically collegial learning community should be the key focus of every principal and, in this re-culturation of their schools, principals should be supported and encouraged by the Department. That they are currently being inhibited by the attrition of an overwhelming workload and impossible administrative demands is now beyond argument.

There can be little doubt but that secondary school headship is an extremely challenging position impacting on one's wellbeing, emotional state, physical health and family life. A high-quality, reality-grounded preparatory programme would serve to reaffirm an aspiring principal of their capacity to do the job or even convince others that it is not for them at this time. In any event, JMB would be prepared to engage with DES in the identification of key elements required of such an initiative and to support its implementation on a system-wide basis.

To summarise, the neo-liberal impulse to measure everything must be resisted in education. Schools *are* accountable to the tax-payer and to their school communities but their significant contribution to the development of confident, educated, responsible, healthy, well-adjusted and happy citizens is literally immeasurable.

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

Like the Department, JMB does not view the provision of post-primary education in isolation from early childhood, primary and third-level. A consensus has emerged that investment in early childhood and primary schooling pays-off to a significantly greater degree than second or third levels in terms of impact on the learning capacities and developmental progression of the child.

That said, Ireland's excellent standing in terms of progression to and completion of senior cycle means that the terminal examination significantly determines a young person's life-chances and we must therefore enhance our national post-primary provision to ensure the best possible outcomes for all students.

The post-primary experience begins with the transition into junior cycle and teachers have frequently reported that sixth-class children 'power-down' once they begin first year. This performance-lag is largely due to a significant mismatch between the primary and post-primary models of schooling, a feature which could be significantly remediated with the introduction of enhanced bridging frameworks which are being built into the new programme for junior cycle. The JMB position is that while we welcome the high-level aims and underlying structure of the framework, the implementation plan has been fractured and lacks explicit coherence with the other initiatives currently underway in schools. In hindsight, it would have been far more productive to have embedded an assessment-for-learning model, normed to the national setting, and to use this as a platform for subsequent curricular change as occurred in Scotland.

The attention focussed on junior cycle has distracted civic and professional attention away from some serious and positive developments at senior cycle. The Department's initiating of a debate around 'Transitions' had led to progress being made on a new marking scheme for the Leaving Certificate and addressing the issue of problematic predictability in the examination. Nothing, however, on the transitions question can move until the HEIs decide, unilaterally or together, to broaden their entry routes and take the artificially generated 'heat' out of the points race. JMB urges the Department to include the creation of momentum in this area as a goal in its strategic plan.

Revision of certain senior cycle subjects (agricultural science, economics, applied maths) is underway as well as trialling of a new in-school assessment model for practical sciences. The broader-scale implementation of these initiatives, particularly the practical assessment of LC biology, physics and chemistry, will come at a cost and DES must be prepared to resource this adequately.

The trialling of Politics and Society is welcome, though even this limited introduction took some years between its finalisation by NCCA and its authorisation by the Minister. Such delays limit both the scope and scale of subject revision as well as leaving outdated frameworks in the system for longer than acceptable.

Across the curriculum, schools are being encouraged to integrate new technologies into teaching and learning as well as in administration. These ambitions, however, will only be realised if a medium-term policy framework incorporating new fiscal realities is put in place with ring-fenced funding and a timeframe for delivery agreed with the education partners.

Finally, over 45 voluntary secondary schools are engaged in the provision of high-quality further and adult education programmes and courses. The recent reconfiguration of the FET sector has created a significantly increased compliance-based workload as well as imposing a fee-structure demanded of providers not in place heretofore. JMB and ACCS seek the removal of a fee-requirement payable to QQI for schools in our sectors and also the provision of a support and engagement model to ensure the continuity of this school-based provider sector into the future. Our Joint Further Education Representative Group (JFERG) has the authority to enter into discussions with the Department and SOLAS on these developments.

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

*(a) Teacher Supply*

Meeting the skills needs of the future begins with a national teaching cohort reflective of need across the system. Principals consistently report that the top ten most difficult subjects to find teachers for are:

1. Irish
2. French
3. HE
4. German
5. Maths
6. Physics
7. Spanish
8. Physical Education
9. Science
10. Guidance

School leaders in our sector recommend that to address this critical issue:

- A long-term planning strategy by DES, based on projected future need, is vital if we are to have a guaranteed qualified cohort of young teachers coming through.
- Address the current impasse regarding the inequality of salary for young teachers as current pay policy is leading many graduates to emigrate.
- The fractionalisation of secondary teaching posts is having a huge effect.
- It is impossible to get a Home Economics replacement teacher. Our single training college needs to take in at least triple the cohort if not quadruple to meet anywhere near demand.
- The Teaching Council needs to work with the universities in relation to how places are allocated on the PME courses. Subjects are not taken into account so there is an excessive amount of English teachers coming out but not nearly enough in certain other subjects.
- A two year part-time post-graduate course in Irish and modern continental languages similar to that provided for out-of-field Maths would help alleviate teacher deficits.
- We need a connection between PME Providers, Second Level School Representatives and the Allocations Section in DES.

- Schools should have more of an impact into PME course design - universities hide behind and blame the Teaching Council for the structure of this course.

#### *(b) Fee-Charging Schools*

The on-going deterioration in the PTR for schools in the fee-charging sector continues to represent a form of discrimination between children in one type of Voluntary Secondary school as against another. Dismissing the fee-charging secondary sector as elitist represents a lazy form of judgement. Fee-charging schools, a long-standing and successful example of Public-Private Partnership, provide diversity and are a net contributor to the economy. Most parents opting for such schooling make sacrifices based on their belief in education and their children's future.

In an analogous consequence to the reduction in affordability of private health care, the government's ideological (as opposed to fiscally rational) attack on the PTR for such schools is forcing the State to provide for these students, and indeed whole school communities, in the 'free scheme' at an even greater cost.

There is no such thing as 'free' education – either the State pays or parents pay. Schools in the fee-charging sector, where parents pay more, save the State money. The widening gap in pupil-teacher ratio between schools in the free-scheme and those that are fee-charging must not be further increased as the inevitable outcome will be fiscally counterproductive on a significant scale.

#### *(c) School Buildings*

In successive programmes for government, including the current plan, the elimination of prefabricated classrooms has been specifically identified as a national priority yet, along with the provision of an annual capital budget to schools, this too has failed to materialise.

The new government has now indicated that 'significant funding has been secured as part of the Capital Plan, to deliver a school capital investment programme for extensions/refurbishments, additional school places, and eliminating the use of prefabs'. It is clear, however, from the Secretary General's speech to the JMB 2016 Annual Conference that investment will be targeted at demographic growth rather than enhancement works or the provision of facilities in our sector with its historically older and inapt building stock.

JMB meanwhile welcomes the Minister for Education's announcement of 28<sup>th</sup> April 2016, approving a €30 million investment under the Summer Works Scheme 2016-2017. A total of 197 schools – 135 primary and 62 post-primary schools were approved for funding in this first round under the multi-annual SWS scheme for 2016 and 2017.

While welcoming this important funding for schools, we are concerned that just €30 million of the €40 million allocated for this year's SWS has been allocated.

Furthermore, we regret that only two categories – gas and electrical works - have been earmarked for this round of funding. In addition, just 32 voluntary secondary schools benefitted under this round – this compares with 51 schools in Round One of the last scheme (March 2014), 51 in Round Two (May 2014) and 53 in Round Three (April 2015).

As an immediate, high-impact provision, the Summer Works Scheme and the Additional Accommodation Scheme should be expanded in scope and scale. This will ensure significant savings are made by reducing the number of major refurbishment projects and re-builds required across the sector.

The JMB also calls on government to set out a five-year plan to provide a full-sized sports hall facility in every school.

*(d) Enhanced NEPS Provision*

JMB identifies the following eight current and future challenges which must be supported by a fit-for-purpose and adequately resourced school psychological service:

1. One of the key elements of the new school profile model is the standardised testing outcomes of incoming students. Management sees NEPS as having a role in supporting standardised testing and its use in identifying SEN. The psychologist should be the overall supporting agent to the school in generating its profile and in best practice in in-school deployment decisions.
2. The building of professional SEN capacity at teacher level requires serious consideration under the new Inclusion Support Service (ISS) proposal. Schools have been losing experienced and qualified SEN teachers due to decreases in overall staffing, redeployment, retirement and secondment. ISS personnel should help build capacity at school level and support the growth of professionalism in this area with classroom teachers, SENCOs, resource teachers and SNAs.
3. Even though psychological reports will no longer be used to trigger resources, schools will continue to need testing and interpretation of reports to support in-school deployment decisions, particularly with complex cases. NEPS must continue to provide a testing service to schools for this purpose.
4. To achieve greater coherence of service, there should be a multi-disciplinary team meeting of ISS, NEPS, SENO and EWO with the principal, deputy and SENCO at least yearly to advise on how the school is managing its resources and on how the students' needs are being met.
5. School management bodies see as essential a clear alignment between the new ISS and NEPS with the Child and Adolescent Mental Health Service. Access to CAMHS is currently blocked for schools and the child's GP is now the principal avenue of referral. We want schools to be enabled to refer students to CAMHS and to copy the referral to the GP.
6. In the new model, the principal makes in-school deployment decisions and is answerable both to the board of Management and to parents for such decisions. Few principals have qualified SEN experience. Principals need a professional layer of advice to support their decision-making on deployment as well as to protect them in the case of appeals.
7. There exists a critical and growing number of students displaying emotional and behavioural disturbance in our schools. We are anxious that NBSS, under the new arrangement, may not be given the capacity to support all schools with EBD interventions and strategies and it is our contention that the NBSS be supported by NEPS to broaden the provision of its service.

8. School management continues to come under pressure to provide psychological and other reports to support applications for the HEAR and DARE third-level access programmes. The same is true of RACE applications for Leaving Certificate. It is essential that NEPS will support schools with these essential application processes.

## **7. Tackling Disadvantage**

Even a non-partisan, independent assessment of the cuts imposed in our schools in recent years must come to the conclusion that in-school supports for the most vulnerable represented optimal 'low hanging fruit' for savings. This list of just 20 sample cuts below speaks for itself:

1. Increase in the pupil:teacher ratio, reducing subject provision and increasing class sizes
2. Reduction in the number of EAL teachers a school can employ
3. Withdrawal of teacher posts historically provided under previous disadvantage schemes to non-DEIS schools.
4. Reduction in capitation funding for Travellers
5. Withdrawal of certain capitation funding from schools that are not in the DEIS programme but had continued to receive top-up funding under previous disadvantage initiatives
6. Abolition of grants for Choirs & Orchestras, Home Economics, Physics and Chemistry
7. Abolition of grants Junior Certificate Schools Programme, Leaving Certificate Applied, LCVP and Transition Year
8. Abolition of book grant scheme for non DEIS schools
9. Cessation of funding to local authorities to support school library services
10. Post-primary school transport charge increased from an annual fee of €168 for junior cycle children and €234 for senior cycle children to a single annual fee of €300
11. Non-implementation of the EPSEN Act, 2004
12. Moratorium on appointment to posts of responsibility in schools, reducing the number of year heads and SEN coordinators in many schools
13. Abolition of ex-quota post of Guidance Counsellor
14. Post-primary school transport scheme cost for individual student increased from €300 to €350; changes to eligibility criteria
15. Average 5% reduction in funding grants to schools' mainstream and ancillary grants for the School Completion Programme and Youthreach
16. Reduction in capitation rates payable in respect of Senior Traveller Training Centres
17. Change pupil:teacher ratio for LCVP from 17: 1 to 19:1
18. Abolition of teaching hours for Travellers
19. General reduction in capitation grants by 11% over four Budgets
20. Reduction in Back-to-School-clothing & footwear allowance: from €305 to €250 for second level pupils

As the country's finances begin to recover, DES must identify a set of strategic priorities for action across this spectrum of deficits which have built-up since 2008/9. JMB insists that (a) provision for guidance and counselling and (b) restoration of the cut in SEN resource hours

are given such priority. Economically and operationally the cuts to these services were absolutely unjustifiable and the DES strategic plan must set out clear pathways for a restoration of these fundamental resources. The cost of doing nothing is already very high and JMB has made detailed submissions to the Department on the school and child level effects of cuts to both these services.

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

As debates on patronage and enrolment begin to become crystallised into legislation and regulation, it is important to reiterate both the nature and role of denominational education in Irish society and its long history of service across many generations, indeed pre-dating the foundation of the State itself.

While the rationale for choice of school by parents (and, increasingly, by young people themselves) extends to location, friends, cost, curriculum etc., it must be accepted that parents place a high priority on values and, however they articulate it, wish to have their children educated within an ethos reflecting the moral and spiritual frameworks underpinning their family life. For a significant number of parents the ethos of the school is *the* critical factor when selecting a school for their children.

Current debates around both patronage and enrolment challenges are founded on the principle of inclusivity. Any fair-minded examination of enrolment and inclusion practices in voluntary secondary schools will point to a record of both wholehearted inclusion and creative adaptation to the changing needs and composition of local communities and Irish society as a whole.

With a combined enrolment of over 185,000 students<sup>5</sup>, admissions policies and practices in voluntary secondary schools can only be described as inclusive, compliant and essentially unproblematic. It is the position of the JMB that the results of the DES audit of enrolment policies in 2008 indicating '*no evidence of any system-wide enrolment practices that give rise to concern*'<sup>6</sup> should form the foundation of the present consideration and that the high levels of integrity with which our schools have been exercising their responsibilities should, in the first instance, be commended by the Minister.

Existing legislation, though lacking in overall coherence, nonetheless already provides for a comprehensive range of rights and responsibilities in respect of schools, parents, students over 18 years and the State. It is not the case that schools have been operating in a legal vacuum in respect of enrolment. Currently, there are three key pieces of legislation which require to be considered in the context of admissions to schools: the Education Act 1998, as amended, the Education Welfare Act 2000 and the Equal Status Acts 2000-2011.

The proposed Education (Admission to Schools) Bill and associated regulations will have a significant impact on schools and families across the primary and post-primary sector. Importantly, this legislation represents a further intervention on the part of the Minister for Education and Skills in the admissions process and future Ministers will be able to dictate to a large degree the content of admissions policies, including the prescription of permissible

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<sup>5</sup> <http://www.statcentral.ie/viewStat.asp?id=39>

<sup>6</sup> *Discussion Paper on a Regulatory Framework for School Enrolment* (2011), DES.

and non-permissible criteria to be applied in the case of over-subscription, how admissions policies are to be published and reviewed and how the admissions process is to be conducted by schools, including the conduct of appeals against refusals to enrol.

It has been the JMB position that the introduction of a new regulatory framework, as opposed to a legislatively-driven approach, would have represented a more appropriate methodology to bringing coherence to the question of school enrolment as well as congruity between currently distinct phases of the education system and sectors within it.

JMB nonetheless appreciates the concern for civic values of equity and fairness underpinning the proposed legislation and is prepared to work with the Minister and his Department officials to maximise the positive objectives underpinning any eventual Bill.

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

The core strategy of the government must centre on maintaining high, common educational and care standards across the nation. Standards and standardisation are not the same thing. There is no reason why young people in Killybegs and Kilmainham must follow exactly the same curriculum and have their learning outcomes assessed identically. If, however, schools are to be given additional scope for local decision-making – even with appropriate capacity and resourcing – there must nonetheless be in place a way of taking into account the interests and wishes of their stakeholders. Such interests range from the tax-payer to the family and it is clear that parallel to increased autonomy, a whole new set of accountability rubrics will emerge, each one (as now) the sole responsibility of the principal. Meanwhile, the call for a strengthening of parental involvement in decision making at school level presupposes capacity and willingness, the existence of consultative and collaborative structures, time for engagement and, above all, a clear consensus around what are and are not appropriate domains for such engagement. At this time, none of these provisions are in place.

Capacity aside, another key concern lies in the maxim ‘what is held to account is what counts’. We are currently emerging into the second four-year phase of School Self-Evaluation which will maintain its teaching and learning focus and extend into SSE for leadership and management. Underpinning SSE across its domains is a philosophical paradigm called ‘evidence-based practice’ which seeks measures of outcomes against which to evaluate ‘progress’. Learning outcomes target-setting, for example, was presented in the original SSE Guidelines as the sometimes numerically impossible:

*School improvement targets (e.g. X% of our students are doing higher-level English for Junior Certificate. In Year 1, we will increase this to X+5%, in Year 2 to X +10% and to X + 15 % in Year 3).<sup>7</sup>*

In a greater-autonomy scenario wherein *every* aspect of school life must submit to accountability measures, it is obvious that the risk of a check-box compliance culture will emerge to the detriment of the relational, and indeed emotional, ecology of leaders, teachers, students and parents in the school community. What is needed in the autonomy-accountability discourse is a genuine appreciation of both school culture and Irish-normed

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<sup>7</sup> INSPECTORATE (2012) School Self Evaluation: Guidelines for Post Primary Schools



professionalism and the re-emergence of civic and institutional trust in the undoubted quality of our educators. Meanwhile, the greatest assurance of quality in our schools lies in the autonomy of the families it serves and their right to send their children to another school if their needs are not being met. JMB therefore reasserts its support for parental choice as a civic and moral lever in educational provision and is committed to the principles of inclusion, equity and quality for all its schools.

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

While everyone has to make a living, it is a serious mistake to view the educational enterprise as a vehicle for the production of entrepreneurs, artists, scientists, technologists or any other profile the state currently views as a contemporary priority. These priorities change all the time. The mission at the heart of education must be to create lovers of learning – lifelong, multifaceted, agile and life-enhancing. The curriculum must therefore be relevant, coherent, engaging and professionally mediated by enthusiastic teachers. We have identified some characteristics of such provision as:

- Coherent and with clear continuity between its various phases
- A preparation for the challenges of life
- A preparation for further and higher education
- A preparation for the world of work
- A preparation for citizenship
- Authentically holistic, which includes an awareness, understanding and experience of the sacred in human experience

Individuals and society benefit from the provision of a broadly-based, yet rigorous education and the current curriculum provides scope for the majority of students to engage in areas of core learning and subjects of their choosing as well as achieving to academically challenging standards generally aligning with their capacity. In terms of improvement, JMB would identify the following as priorities:

- Curriculum specifications should be updated and revised regularly in light of developments in subject areas
- The Leaving Certificate Applied Programme is due for revision
- RSE should be better supported and integrated into a mandatory Senior Cycle SPHE framework
- The backwash on senior cycle from third-level entry demands is no longer appropriate or acceptable. At the very least, work on broadening entry routes to higher education should be accelerated and aligned to the revised grading system and CAO points framework for the Leaving Certificate examination
- To provide greater coherence with junior cycle, the set of key skills trialled at senior cycle in some schools should be revised, mainstreamed and supported

- High retention rates into senior cycle mask the fact that this form of post-compulsory education is not appropriate for all young people. Those gifted by different cognitive and aesthetic qualities as well as those challenged by special educational need do not ‘fit’ the one-size-fits-all model.

Civic discourse on education and schooling is limited, reactive and generally focussed on peripheral developments. Small scale add-ons or short lived adjustments to the current ‘factory model’ of schooling in Ireland are just tinkering. What is really needed is a national conversation on post-primary education in general. This will need to encompass not just a vision but propose courageous steps to address the mismatch between the knowledge, skills, aptitudes and attitudes young people need to live a rich and full adult life in the 21<sup>st</sup> century and the educational structures which are currently in place to prepare them. This process would begin and be underpinned by a Green Paper and a new National Forum on Post Primary Education.

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

The core function of a school is schooling. In the case of our schools, everything we do must ultimately lead to enhanced teaching and learning outcomes for our students. That said, there are times and situations wherein the wider community can also benefit by availing of certain facilities and other assets held in trust by the school.

The core issue here is not the ‘will’ but the ‘way’. Engagement with further and adult education, use of sports facilities, provision of computer classes, drama and musical engagements, hobby and leisure classes etc. all require insurance, staffing, caretaking, coordination, supervision, key-holding, locking-up, reporting, financial arrangements, building protection, alarm-management, car-parking supervision, heating, lighting, gas, etc. etc.

If the Minister is serious about expanding the use of school facilities, there will have to be a funding framework put in place which does not erode the already inadequate funding status of the core school or place further workload burdens on management.

## **12. Special Needs Education**

The trialling of a new school-profile based model of allocating resource hours to schools has now completed. JMB has maintained close contact with its pilot-phase schools and, while there have been some improvements in in-school provision, a raft of deficits continue to impact on the delivery of the new model. The key concerns of pilot-school principals which must be addressed in advance of a system-wide roll-out include:

### *Determination of Profile*

- The basis of their profile was not shared with the pilot schools. There was no knowledge of the percentage weighting given to the five profile elements or how these translated into allocations at school level.

- Utilisation of exam fee waiver as a proxy for social disadvantage was considered to be too limited in scope and inappropriate
- The use of low-incidence allocation as a proxy for complex need was seen as unhelpful, particularly as EBD conditions were ignored.

#### *Quantum of Hours*

- The majority of pilot schools either remained static in terms of their allocation or gained a modest quantum of RT hours.
- Schools with even moderately high rates of assessments expect to face a reduction in RTHs under the new model. This, where it occurs, should be phased-in and not sudden.

#### *Identification of Sp. Ed. Need*

- No pilot school had received advice, a visit, guidelines or support in identifying complex educational need.
- No principal felt qualified to make SEN identification or consequent deployment decisions.

#### *Testing*

- The reduction in psychological assessments will inevitably lead to a greater requirement for testing at school level to make deployment and individual provision decisions.
- There still exists a shortage of trained, qualified SEN staff in schools to carry out testing.
- Testing is expensive and the grant aid nominal.

#### *Role of the Principal*

- Considerable anxiety was articulated by principals around their proposed role as ‘judge and jury’ on individual deployment decisions.
- Anxious and angry parents can challenge any decision by the principal.
- No appeal process is in place to arbitrate on decisions made by the principal.

#### *Parental Expectations*

- Parents are completely unaware of the changing landscape of provision for their children.
- Communication with parents is essential to protect the principal.

#### *IEPs*

- IEPs are still not provided-for under legislation as those elements of EPSSEN have not been commenced because they carry resource implications.
- Circular 70/2014 nonetheless requires IEPs though not in those terms.
- Principals expressed concerns around both the administration workload and long-term accountability demands of IEPs by stealth.

### *Clarity of Expectation from DES/NCSE*

- School leaders generally felt under-informed about the terms and conditions of the pilot process.
- The new Inclusion Support Service doesn't exist.
- The DES doesn't appear to realise that this initiative is just one of a plethora of changes affecting school management.

### *Whole School Approach*

- Every externally mandated change is now expected to be mediated as a 'whole school' enterprise.
- Principals agreed that SEN is everyone's concern but no support is being provided to make this significant cultural change a reality.
- Mainstream teachers will need considerable levels of CPD to broaden the responsibility-base and provide for better SEN inclusion at classroom level.

### *SNAs*

- The pilot is focussed solely on RTH provision but SNA allocations are being withdrawn from all schools and this impacts on resource provision.

Meanwhile, the JMB, and specifically our pilot-school principals, have repeatedly asserted the need for a dedicated post of SEN Co-Ordinator (SENCO) in every school. Their feedback emphatically asserted the following points:

1. There was absolute unanimity that every school must have a dedicated SEN Coordinator
2. Continuing to find coordination time from within the RTH allocation was widely seen as unethical and inefficient
3. New principals (the majority of the national school-leader cohort) found utilising students' hours for coordination problematic
4. There was no clarity or advice on the proportion of hours which should be dedicated for SENCO activities
5. SENCOs at the seminar expressed their sense of being overwhelmed by their demands of the role
6. Principals reported being unable to keep a SENCO in the role for any extended length of time, due to the role expansion, admin overload and lack of time
7. Vol. Secondary schools are given no time for duties in their posts of responsibility
8. Principals agreed that SENCO time should be given as a flexible but adequate quantum of hours each year

In addition, pilot school principals reviewed the role description of the SENCO emerging from the Limerick SENCO Forum and agreed that it comprehends a wide range of functions including<sup>8</sup>:

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<sup>8</sup> Source: Limerick SENCO Cluster Meeting, March 2015

<b>Administrative tasks</b>	<ul style="list-style-type: none"> <li>• Timetabling - SNAs, Teachers Record Keeping</li> <li>• RACE applications and appeals</li> <li>• RACE for mocks, in-house exams</li> <li>• Testing Applications (NCSE)</li> <li>• Compiling Student Registers Designing IEPs/ ISPs/ Student Profiles</li> <li>• Subject reduction or transfer</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings (parents etc.) File/ data management Correcting</li> <li>• Attending meetings; CARE group, HSCL, Crisis Response, SEN etc.</li> <li>• Facilitate transition; Apply for SNA; SNA coordination; Assistive technology applications</li> <li>• DARE applications; Exemptions</li> </ul>
<b>Strategic</b>	<ul style="list-style-type: none"> <li>• Forward planning (incoming); Meetings</li> <li>• Attending meetings - Student Support team, SEN team meetings</li> <li>• Disseminating information at staff meetings Presentations to staff</li> <li>• IEPs/ ISPs/ Student Profiles</li> <li>• Primary school visits</li> <li>• CPD - new SEN Team &amp; whole staff</li> <li>• Liaison with NEPS, NCSE, CAMHS, Intervention Services, SLT, NBSS etc.</li> <li>• Facilitating transitions</li> <li>• CPD for new programmes- applying for resources</li> </ul>	
<b>Reactive</b>	<ul style="list-style-type: none"> <li>• Meetings Planning</li> <li>• Applying for hours (new diagnosis etc.); Contacting external agencies, parent support</li> <li>• Upskilling</li> <li>• Referrals or concerns from teachers/ feedback from teachers, student incidents</li> <li>• Parents at PTM/ parent involvement in CAMHS</li> <li>• Behaviour issues with certain students</li> </ul>	
<b>Enabling other colleagues</b>	<ul style="list-style-type: none"> <li>• Advising others; Team-teaching; Disseminating information</li> <li>• Liaison</li> <li>• Meetings at lunchtime and coffee break CPD for staff and SEN team</li> <li>• Identify outcomes of testing and suggest resources and methodologies to subject teachers</li> </ul>	

<b>Direct work with students with SEN</b>	<ul style="list-style-type: none"> <li>• Resource/LS-teaching and team teaching</li> <li>• Direct student input; assisting individual students with issues. Meeting students, especially senior students and new 1<sup>st</sup> years</li> <li>• Lesson planning and designing resources</li> <li>• Identify outcomes of testing and suggest resources and methodologies to subject teachers.</li> <li>• Behaviour work</li> </ul>
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The JMB therefore demands that the Department immediately provides for SEN Coordinator functions with an allocation of 10% of the new-model profile hours as an additional allocation of SENCO time-for-duties to each school.

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

In terms of national priorities in a time of continuing fiscal restraint, the focus must shift from the peripheral to the core enterprise – the experience and outcomes for our students, current and prospective. From enrolment to progression, every aspect of school life must retain a student-centred perspective, even if a particular intervention is not immediately visible in these terms, such as the wellbeing of the adults in the school community.

The innate conservatism of educators reflects a ‘gate-keeping’ function, protecting young people from the vagaries of politically-driven interventions in education. To list here a suite of potential skills-needs is to ignore the evolutionary and contingent nature of developments in education. We must first characterise current provision, determine what is needed or missing for students, agree on what is out-dated, inappropriate and can be ‘let-go’ of, and only then to map possibility against capacity. Rather than a shopping-list of benefits, a set of nationally agreed principles appears appropriate such as enhanced equity, access, inclusion, engagement and participation for students; enhanced dialogue and mutual understanding between schools and their communities; enhanced capacity-building and resourcing for management and leadership in our schools, and, most importantly, a re-professionalisation of the teaching profession with a focus on what happens in the classroom – the ultimate locus of the teaching for learning project.

### **Concluding Comments**

The JMB wishes to record its appreciation for the respectful and collegial working relationships that exist between our organisation, its member schools and the various officers and sections within the Department. The commentary in this submission is set-out in a spirit of cooperation in light of our common focus on the quality of our country’s educational service. We will be happy to expand on any element of this set of recommendations and look forward to working with the Minister and his officials into the future.

**John Curtis, JMB General Secretary**

**8<sup>th</sup> June 2016**