

***Submission
on
Consultation Paper – Statement of Strategy 2016-2018***

***On behalf of the
National Association of Boards of Management in Special Education
NABMSE
June 2016***

1. Introduction

The core purpose of NABMSE is to unite Boards of Management in special education in the Republic by providing a means for the expression of their individual and collective experience on matters affecting the education of children with special needs. Our core objectives are:

- ☐ ***To promote the highest standard of education for persons with special needs.***
- ☐ ***To achieve adequate deployment of resources to support education for persons with special needs.***
- ☐ ***To encourage and facilitate communication and co-operation between persons engaged in the education of persons with special needs.***
- ☐ ***To arrange or assist in arranging and providing conferences, discussions and meetings on subjects of general or special interest in the field of management in special education.***
- ☐ ***To promote the study of best practices with regard to their impact on enhancing the abilities of persons with special needs.***

NABMSE has over 175 school members (Special Schools, Mainstream primary and post primary schools) across the Republic catering for children across the full spectrum of special needs.

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General Issues

How well does the Education Service meet the needs of children and students? What improvements can be made (a) within existing resources or (b) through new provision?

(a) **Consultation** with all the education stakeholders is welcome. However, more advance notice should be given in order to have a more meaningful consultation with all.

(b) Integrated approach between agencies including health and education

Substantial monies are spent in the education system. However, a more integrated approach throughout the system might yield better results. There needs to be more robust integration between health and education particularly in the provision of therapies, services and nurses. It is suggested that other therapies such as occupational therapy, speech and language therapy, physiotherapy, behaviour support, psychiatric support could be provided to schools on a cluster basis and the basis for the provision of health services should be population density. Early intervention is the key to addressing special educational needs (SEN). All schools including special schools should be under the remit of NEPS.

The introduction of improved interagency working arrangements mentioned on page 66 of the Programme for Government is welcome and this interagency working should be extended to working with schools.

(c) Supporting Students with Special Educational Needs in Schools – NCSE policy advice

Findings and recommendations of this report should be examined and implemented should be considered as soon as possible. This report includes many recommendations relating to the Programme for Government. The implementation of recommendation 27.2 for reduced pupil teacher ratio for pupils with serious medical needs and the provision of funding for access to school nurse would reflect the complexity of pupils presenting in some special schools,

(d) EPSN Act

While NABMSE welcomes the commitment in the Programme for Government on consultation with stakeholders regarding progression of EPSN, it is strongly recommended that EPSN should be implemented in full and without delay. This was also recommended in the aforementioned NCSE report.

(e) Special Schools as their own sector

Consideration should be given to the recognition of special schools as their own sector. Special schools cater for pupils aged 4-18 years and offer curricular and social programmes mindful of inclusion, diversity and self-management skills. They provide access to certification at second level with many providing access to State Examinations. Many offer pathways to lifelong learning through specialised programmes and provide support to families and caregivers. Currently, special schools are designated as national schools regardless of provision at second level.

(f) Posts of Responsibility

All staff should be included in the numbers for the determination of posts of responsibilities for special schools including for the posts of administrative principal and deputy principal. An example: A special school has 100 staff to include teachers, special needs assistants (SNAs), bus escorts and caretaking/cleaning staff. This school has no administrative deputy principal. There is an anomaly in the education system where a mainstream school with 5 special classes can appoint an administrative deputy principal with no specified enrolment (CL 07/2016 – Appendix B)

(g) Training and Continuous Professional Development for all staff

All staff working in special education should be trained to a very high and consistent standard. Whole school training is invaluable and staff assisting the pupils throughout the school day (including SNAs and Bus Escorts) should also be trained to ensure the pupil with SEN obtains the maximum benefit from the school day. NABMSE funded and evaluated a very successful training programme for Bus Escorts in 2013/2014 and would welcome the opportunity for a national rollout of this programme.

It has also been suggested that a training fund be available under the auspices of the Special Education Support Service (SESS) for targeted training for **all** staff and not just teachers. The SESS provide a good service to schools but this should be expanded to cover all staff.

Special schools and classes have ongoing training needs which may need to be refreshed every two years e.g. manual handling, behaviour intervention. This is a considerable ongoing cost for schools that currently needs to be met through fundraising or through capitation funding. (now reduced)

(h) Board of Management training

In light of the responsibilities of the Board of Management under Section 15 of the 1998 Education Act, it is essential that the fund for training Boards be continued and maintained at pre-2010 levels. Consideration should be given to the additional two modules of national training and the additional burdens on Boards of Management with the introduction of an Ombudsman for Education where decisions of a Board may be appealed (Programme for Government- page 89). It should be remembered that Board

of Management members are volunteers who are giving freely of their time and are managing schools at little or no cost to the State.

(i) Infrastructure and Buildings

In the Strategy statement 2015-2017, Goal 4 was building the right systems and infrastructure and states;

Strategy – We will ensure an appropriate supply of educational infrastructure to meet demographic demand and provide high quality replacement accommodation.

The urgency for the implementation of the above strategy needs immediate attention. Many of the buildings currently catered for pupils with special needs are out dated and require refurbishment or replacement. Schools have struggled to accommodate pupils with learning disabilities and complex needs without the appropriate facilities. Response to applications made by Boards of Management for additional accommodation or refurbishment and replacement of existing facilities needs to be accelerated.

(j) Inclusion

The whole area of inclusion needs a very definite strategy and one which seeks to include various government departments working together for the betterment of all.

In order to enhance opportunities for inclusion, the DES should consider the possibilities of dual enrolment and placing any new special schools alongside or on the campus with mainstream schools.

(k) Transition planning

NABMSE welcomes the recognition that particular focus on transition points on page 70 of the Programme for Government. Early transition planning should involve health and education at all 4 transition points in the education system.

A Programme for a Partnership Government – Chapter 10 Education

A. Prioritising Early Years

Are we capturing the essential issues and are there additional matters to be taken into account ?

Many NABMSE member welcome the raising of the school starting age to 5 years. It is felt that this will allow for consistency across the admissions process as many schools enrolling pupils with SEN are enrolling at different ages. If children are entering primary education at age 5, they will have acquired more social skills and enable them to cope with the school system. Smaller class sizes are welcome and will allow for the early identification of difficulties and early intervention.

Consideration could be given to the following:

1. More pre-school places for children with SEN
2. Early Start programmes to be available in all special schools
3. There is a need for SNA support in pre-schools run by DES
4. There should be an increase in the opportunities in learning through play
5. Arts education should be included as part of early education programmes

How can progress be measured?

1. More children with SEN participating in pre school
2. Measure the impact of readiness for school on all children especially those with disabilities
3. Learning outcomes can be documented by observation records and portfolio

Priority Actions and outcomes in this area?

1. Identify those children who may be experiencing difficulties (social, intellectual, physical etc) and attempt to address these as early as possible
2. Include children with disabilities in full programmes as early as possible
3. Quality of provision and staff should be priority actions

B. Tackling Disadvantage

Are we capturing the essential issues and are there additional matters to be taken into account ?

1. Rural disadvantage is often overlooked i.e. poorer accessibility to playgrounds, libraries etc
2. Examine July Provision with a view to opening programmes in arts education and sports to children with disabilities
3. Schools often find it difficult to recruit suitable qualified staff for July Provision due to the lateness of payments to staff (Staff work in July and are paid in November)

4. NABMSE welcomes the commitment to ensuring that all 18-year-old school leavers with intellectual and physical disabilities have continued education or training opportunities. (page 72 Improving lives)
5. Additional supports to early school leavers is reactive – additional supports should be proactive and be introduced at an earlier stage. Initiatives such as Home School Partnerships should be encouraged and post primary schools should take a more holistic approach and not just focus on academic skills.

How can progress be measured?

1. Research of the outcomes of pupils is the best measure. Measures could include staying on in school, learning to read/write/use technology (if appropriate). Self-esteem and active participation in the community are important measures

Priority Actions and outcomes in this area?

1. More community based services attached to schools
2. More broad based package of measures which encompasses all aspects of education which are impacted by disadvantage or disability
3. Set up behaviour support teams who will visit schools and work with them. This could be by expanding the National Behaviour Support Team. Allied to this could be the setting up an in school behaviour support team with one teacher released to lead this initiative.

C. Diversity and Choice for Parents

Are we capturing the essential issues and are there additional matters to be taken into account ?

1. NABMSE have made submissions to the Forum for Patronage and Pluralism. They have made a submission on the Education (Admissions to Schools) Bill expressing concerns on the possible effects of the Bill on special education (submission attached)

A reply was received from the previous Minister in September 2015 '*acknowledging that some work remains to be done so as to ensure that this legislation, when enacted, does not disrupt the smooth operation of the admissions process to special classes and special schools.*' NABMSE are willing to engage with officials of the Department of Education and Skills regarding this Bill.

2. It should be noted that parents of children with additional needs have the right to a 'joined up' service for their child where health and education work together for the good of the child.
3. We also note Goal 3 Strategy 3 Statement of strategy 2015-2017 – '*Develop further policy and programmes to support learners with SEN and disabilities in participating and progressing across the continuum of education*'. This strategy should be kept under review and enhanced. While the Junior Cycle Level Two Learning Programmes

are now being used in special schools, we look forward to progress on the Junior Cycle Level One Learning programme for another cohort of students.

4. There is reference on page 89 of the Programme for Government of Schools on parents receiving annual reports on how their schools are doing. It is important that schools should be measured on more than their scores on standardised texts. Inclusion in the school should also be considered as part of any school report. In other countries the effects of the publication of school reports are that those with disadvantage and SEN are further marginalised. Standardised testing is very unsatisfactory for parents unless it is contextualised.

How can progress be measured?

1. Good quality research looking at all outcomes.
2. Qualitative information would give a better indication of progression to parents

Priority Actions and outcomes in this area?

1. Provide parents with the knowledge to make informed decisions
2. Giving a greater voice to **all** parents rather than only those with a strong viewpoint.
3. A clear strategy for inclusion which includes all consultation with all stakeholders
4. Additional funding for BOM training in light of the new role of Ombudsman for Education and the Ombudsman's role in reviewing BOM decisions
5. The role of the Ombudsman for Children would need to be very clearly defined and understood.

D. Promoting Excellence and Innovation in Schools

Are we capturing the essential issues and are there additional matters to be taken into account?

1. A School Excellence Fund is mentioned in this document. This scheme seems to be accessed through application. One wonders how excellence can be measured given the variety of schools and school contexts in our system. All schools strive for excellence, but leadership in schools has been greatly challenged with the decimation of the In-school management system. The school excellence fund should support valuable initiatives that show positive progression.
2. Concrete measures to include all pupils in the school should be one of the measures of excellence.
3. Setting out school capitation over a three year basis is welcome. Reduction in capitation has had a negative effect on school finances. It would be imperative that restoration to pre-austerity levels would first take place, and be followed by an increase in the capitation grant available to schools. School autonomy in terms of the allocation of spending at local level, and in particular allocation of school management based on the local need, is a laudable one, provided the three year grant is sufficient to allow a school to provide for those needs in a fair and equitable way.

4. The Digital Strategy is welcome but consideration should be given to the smaller numbers of pupils in special schools when funds are being distributed. This fund should allow for the provision of specialist assistive technology.
5. While we welcome the increased investment in continuous professional development for teachers, NABMSE feels that this is essential for all staff working with pupils with SEN in order to ensure that the best outcomes are achieved.
6. The issue of the provision of high quality Broadband in all schools should be addressed.

How can progress be measured?

1. Increasing number of schools applying to be considered for recognition for excellence in their sector.
2. Increased number of schools using technology as part of the teaching and learning experience
3. It is important that when measuring excellence that it should be clear that practice is embedded in schools – once off initiatives are quickly replaced by the next new initiative.

Priority Actions and outcomes in this area?

1. Significant funding should be made available for IT. Consideration should be given to the smaller number of pupils in special schools and another mechanism (other than pupil number) should be considered when distributing funding.
2. Consideration should be given to a dedicated fund for interactive computers and touch screen computers for all classrooms
3. Funding should also be made available for ongoing maintenance of systems and devices.
4. Evaluate and increase funding to NCTE

E. Promoting creativity and Entrepreneurial capacity in students

Are we capturing the essential issues and are there additional matters to be taken into account ?

1. Learning for Life and Life skills teaching is very important for those who may not for various reasons be able to avail of the workplace or Higher education options
2. NABMSE welcomes 'the new Government's commitment to ensuring that all 18 year old school leavers with intellectual and physical disabilities have continued education or training opportunities.' (page 72)

Priority Actions and outcomes in this area?

1. The evaluation of transition supports for all pupils moving across levels is one which will be welcomed by all educators. Transition supports are critical and supports at all key transition points are essential. More support is required for schools and parents at the 4 stages of transition in the education system.

2. Students with special needs should be able to access transition year activities. There is no access to transition year in special schools at present
3. Transition from Primary to Post primary:

A critical transition for pupils with ASD in special classes to second level education, where provision displays many gaps, is a serious and critical one, and one which needs urgent attention. It remains a huge challenge for parents to find suitable second level places that can cater for the complex needs of their children. Perhaps a pilot scheme, whereby a second level school opening an ASD unit would be supported by a key transition programme from the primary school. This could be facilitated very easily by providing a number of resource hours to the primary school to allow for visits to the second level school with the pupils preparing to transition in their last year.

F. Better use of Educational Assets within communities

Are we capturing the essential issues and are there additional matters to be taken into account ?

1. The continuation and acceleration of the building programme for all schools

Many of the buildings currently catered for pupils with special needs are out dated and require refurbishment or replacement. Schools have struggled to accommodate pupils with learning disabilities and complex needs without the appropriate facilities. Response to applications made by Boards of Management for additional accommodation or refurbishment and replacement of existing facilities needs to be accelerated.

2. Making the school premises available after hours will require additional resources such as cleaning and caretaking staff, additional heating and insurance costs. This should be factored into any additional capitation being made available.

G. Special Needs Education

Are we capturing the essential issues and are there additional matters to be taken into account ?

1. EPSEN Act - It is now 12 years since the publication of the EPSEN Act. NABMSE strongly recommends that EPSEN should be implemented in full and without delay.
2. NABMSE suggests that no one disability should be singled out when examining the adequacy of current special education access and funding provision.
3. While a new model of in school speech and language therapy is to be established, this should be extended to all therapies, which are necessary for children to access the curriculum and reach their potential. These include occupational therapy, behaviour support, mental health supports among others. NABMSE suggests an integrated approach between Health and Education.

4. NABMSE welcomes the additional investment to the NEPS service. However, this service should be available to all schools including special schools.
5. Page 86 of the Programmes states 'every child leaving primary schools should be able to read and write'. This may be a very difficult target for some students with SEN.
6. New Primary language curriculum – it is disappointing that when the first stage of this curriculum was being developed, there was no specific resources included for pupils with special educational needs. These will be available in time but as an add on, not an integral part. NABMSE hopes that resources for pupils with SEN will be an integral part of the next stage.
7. July Provision – Staffing for this provision can be difficult as existing staff may not be willing to work after a long school year. This causes health and safety concerns for Boards of Management as external staff are working with pupils with SEN often without experience of the pupils' routines and needs. The late payment of staff (in November) can be a disincentive for all those working July provision.
8. New SEN model for mainstream schools. The new SEN model, whilst addressing many issues and challenges, will almost certainly affect many schools with loss of support teachers, who are working in classes assisting classroom teachers in raising standards and providing better outcomes for pupils. Consideration should be given to the level of inclusion and integration taking place in these schools and the associated resources when evaluating the pilot.

How can progress be measured?

1. National assessment procedures in the area of special educational needs should be developed – schools who cannot use standardised tests have limited access to assessment.

Priority Actions and outcomes in this area?

1. Links between Health and Education. The provision of specialist support and therapies to schools or funding to enable schools to access therapies.
2. Access to play, music and art therapies
3. Development of national assessment procedures for schools for whom standardised tests are unsuitable.
4. Parents should be allowed to choose the school that best fits the needs of their child and should not be refused transport on the basis that it is not the nearest school especially if the school is within their HSE area where all services are based. There should be a cut-off point but there should be reasonable exceptions based on geographical boundaries.
5. School nurses – There are some schools where pupils have high medical needs and the presence of a school nurse is essential to enable some pupils to attend school. Co-operation between health and education on the provision and supervision of nurses would be welcome.

H. Meeting the Skills Needs of the future

1. Pupils with SEN should be enabled to attend full time education or training after leaving school which could be focused on independent living and supported employment
2. Lifelong learning opportunities should include people of all abilities and not just those able to access higher education and training.
3. Qualified teachers should be available for the education of students over 18 who have special needs