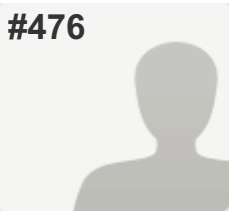


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PAGE 1: Please complete this consultation paper in respect of your area of interest and/or expertise

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Q4: 1(a) What improvements can be made within existing resources

SNPA have always supported the concept of one special educational body by the amalgamation of NCSE, National Educational Psychology Service, Special Educational Support Service (SESS) and the National Behavioral Support Service (NBSS).

The addition of the Visiting Teachers Service for the visual and hearing impaired into the ISS model is welcome, however we are extremely disappointed that NEPS will not be incorporated into an integrated Inclusion Support Service and believe this to be a missed opportunity to streamline the system of special educational supports and simplify pathways leading to the related supports for both a whole school or individual pupil approach. SNPA acknowledges that a major component of NEPS Model of Service is consultative and would complement a whole school planning approach in the identification of training needs for staff and thus build professional capacity in schools to be better equipped to deal with the complex and diverse educational needs of the pupil population overall as well as with individual children. Any savings by the amalgamation of the currently individually based services should/could be frontloaded into providing more qualified support staff as identified above. We would also support the development of the ISS into geographical based teams to support schools in their region to include; facilitating and providing training for teachers and SNAs where appropriate, actual contact time in schools where exceptional circumstances have been identified and a broader and specialist team approach where necessary to support the school to avoid a breakdown in the pupils placement in a proactive rather than reactive manner. SENOs should also be colocated with the ISS Team to ensure a totally integrated approach and a more collaborative service overall. The 'Report of the Education and Health Working Group on Collaborative Working between Health and Education Sectors' outlines how health and education services can be delivered in a complementary and effective manner to children with complex disabilities and the need to optimise resources across the system and minimise duplication, particularly in the context of the current economic environment. Such duplication should also extend to examining facilities and shared administrative capacity across the current individual services, thus identifying potential savings in operational costs that can be redirected to other areas within the proposed ISS.

The ISS must have powers to compel a school to implement therapy team recommendations to prevent cases where the lack of implementation leads to a breakdown in school placement. It is very evident from parent feedback that the main causes for a breakdown in school placement is where a plan has been carefully devised with considerable intervention from outside agencies, Visiting Teacher and Behavioural Specialist recommendations and lack of implementation inevitably leads to an unnecessary degeneration of the pupils experience in school culminating in suspension, expulsion or a (stressed) voluntary withdrawal from the school setting of the pupil by the parent, or reduced school day.

Q5: 1(b) What improvements can be made through new provision

The addition of specialist educators to the proposed Inclusion Support Service, with a minimum academic level of M.EdSEN that can offer direct advisory support to teachers in schools and an increase in the number of Behavioural Support Specialists, we believe would have a big impact in supporting schools and the model of inclusion in mainstream.

An increase in the number of Educational Psychologists to meet the demand for psychological assessments in schools. No parent should be put in a position of having to access assessments and reports privately.

Recognition that reports indicating that schools are utilising Special Needs Assistants for alternative non SEN pupil related duties is due to a lack of administrative and other general resources available to schools. All are agreed that SNAs should not be used outside of the role intended, the solution is to treat the cause/pressure leading to this misuse where identified.

There are only a handful of mixed disability special classes at second level and while the number of classes for children with autism has increased, there are known black spots around the country despite demand and this is very frustrating for parents. We would like to see the NCSE be given additional powers to compel a school to open a special class where demand is documented and a package of adequate funding to accompany the compulsion order.

There are a small number of special classes at primary level for Specific Speech and Language Impairment (SSLI) but there is no special class provision at secondary level for this condition which is life-long and enduring. Some children cope reasonably well with the two year input of an SSLI class, but others may require a longer duration of placement and there should be tailored exceptions to accommodate such children requiring more prolonged intensive support. There is also the issue of co-morbidities and designated special classes and special schools that currently don't meet the needs of children with SEN and disabilities in their area and inadvertently operate exclusionary enrolment criteria based on categories of diagnosis. The model of Community Special Schools serving a wider cohort of children requiring specialist educational support is warranted to promote early relationships for people with disabilities in or near their own communities.

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Q6: 2. 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)?

Special Needs Parents Association welcomes the Departments ongoing consultations with stakeholders on the New Model of Teaching Allocations and are eager to progress to implementation of the new model to meet the needs of all children according to educational needs not diagnosis.

See our original observations on the proposed model here https://drive.google.com/file/d/0B-HNvvR_UrVdaWVYSUpQTnVvWnRVZTRZTjJHbIEtVXFLMTJz/edit

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Q7: 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?

Respondent skipped this question

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Q8: 4. How should success on achieving our strategies be measured.

Respondent skipped this question

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Q9: 5. Comment on any issues relating to the continuum of education and skills, in addition to your particular area of interest and/or expertise

Respondent skipped this question

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Q10: 6. Any other observations that you would suggest the Department should consider in the formulation of our strategy for education and skills 2016 - 2018

Respondent skipped this question

PAGE 8: A Programme for a Partnership Government - Chapter 10: Education

Q11: 1(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).

It is welcome that all children including all children with a disability will have two free years of preschool education and that the Department of Education is working collaboratively with Health and Dept of Children and Youth Affairs to ensure that children with disabilities are supported to access the ECCE Scheme.

Lower class sizes as proposed in the Programme for a Partnership Government will be of benefit to all children and support the settling in and inclusion of children with disabilities.

Consideration for a classroom assistant at Junior Infants and Senior Infants level should be explored.

Q12: 1(b) How should progress on Prioritising Early Years be measured?

It is imperative to measure the effectiveness of the new national framework for children with disabilities to access the ECCE Scheme and its impact following on from preschool to primary education. For children with SEN, outcomes at primary level can be measured through the Individual Educational Plan process.

Q13: 1(c) What would you consider to be the priority actions and outcomes in this area?

Increase in number of educational psychologists.

Reduction of class sizes by 2017.

Encourage a collaborative approach in school settings between early intervention and education

PAGE 9: A Programme for a Partnership Government - Chapter 10: Education

Q14: 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).

Respondent skipped this question

Q15: 2(b) How should progress on Tackling Disadvantaged be measured?

Respondent skipped this question

Q16: 2(c) What would you consider to be the priority actions and outcomes in this area?

Respondent skipped this question

PAGE 10: A Programme for a Partnership Government - Chapter 10: Education

Q17: 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).

Schools Admissions Bill will also have an impact on the soft barriers to enrollment of children with disabilities.

At present there is no legal obligation for a teacher or school to record the use of restraint or seclusion. As a consequence there is no data on the frequency of such practices or the impact this has on the child. There is no independent oversight of the use of Seclusion and Restraint in Irish schools and regardless of whether you agree or are opposed to the practice, this has to change.

The Programme for a Partnership Government states that, "Parents should be able to receive annual reports on how their school is doing". We would caution the sole use of standardised testing as an indicator of the academic standards of a school. Children with SEN may not participate in or score low in standardised tests and schools who seek to perform highly in possible league tables arising out of such reports, may discourage the enrolment of students with SEN.

Q18: 3(b) How should progress on Diversity and Choice for Parents be measured?

No child should be refused enrolment on the basis of disability.

All schools should be required to complete standardised reporting for incidents of restraint and seclusion which should be submitted to the inspectorate on an annual basis.

Q19: 3(c) What would you consider to be the priority actions and outcomes in this area?

Should there be challenges in progressing the Admissions Bill due to the religious component, consideration could be given to decoupling the two areas and a separate Bill be proposed to deal with enrolment of children with disabilities.

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Q20: 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).

Respondent skipped this question

Q21: 4(b) How should progress on Promoting Excellence and Innovation in Schools be measured?

Respondent skipped this question

Q22: 4(c) What would you consider to be the priority actions and outcomes in this area?

Respondent skipped this question

PAGE 12: A Programme for a Partnership Government - Chapter 10: Education

Q23: 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).

Respondent skipped this question

Q24: 5(b) How should progress on Promoting Creativity and Entrepreneurial Capacity in Students be measured?

Respondent skipped this question

Q25: 5(c) What would you consider to be the priority actions and outcomes in this area?

Respondent skipped this question

PAGE 13: A Programme for a Partnership Government - Chapter 10: Education

Q26: 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).

The use of schools as after school facilities makes a lot of sense and would be welcome. However without investment in additional support, after school care would be restricted for children with disabilities and they may remain excluded from such an option.

Q27: 6(b) How should progress on Making Better use of Educational Assets within Communities be measured?

Respondent skipped this question

Q28: 6(c) What would you consider to be the priority actions and outcomes in this area?

Respondent skipped this question

PAGE 14: A Programme for a Partnership Government - Chapter 10: Education

Q29: 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).

Legislation - Implementation of the EPSEN Act 2004

It has been eleven years since the passing of this act. Parents would appreciate an indication of more than a verbal intention to fully ratify all outstanding sections of the EPSEN Act in the lifetime of this government. Two outstanding aspects of EPSEN must be implemented that may require some level of additional expenditure;

a. Individual Educational Plans-General application of the Individual Educational Plan (IEP) as best practice i.e. linking the allocation of educational resources to IEPs so that it would be possible to track how educational supports for individual students were working to help them attain their educational goals. It is interesting to note that although IEPs are not yet mandatory under the Act, in the NCSE's policy advice paper 'The Education of Children with Challenging Behaviour arising from Severe Emotional Disturbance/Behavioural Disorders', the NCSE recommend "Additional supports provided to mainstream schools for students with EBD/severe

EBD should be time-bound, reviewed regularly and conditional on the development of an individual education plan which sets out educational and behavioural targets (Recommendation 4)".

Parents would like to see a mandatory framework for IEPs being developed and implemented in ALL schools, for EVERY child with SEN and which involves a collaborative approach between educators, therapists, parents and where appropriate, the child themselves being involved in drafting of an IEP.

b. Independent Appeals Office - Establishment of an independent appeals process which must be independent of the NCSE or Department of Education. The current remit of the Office of the Ombudsman for Children does not allow them to investigate a significant proportion of the annual complaints pertaining to education according to their 2014 Annual Report. While recent calls for an Ombudsman for Education are justified, an Independent Appeals Office is still a merited proposal. Impartial, fair processes and an opportunity for Oral Hearings if in place may negate the need for many complaints at Ombudsman level with the exception of complaints about Boards of Management which is an issue that should not be ignored by the Minister.

The current Program for Government contains a commitment to publish a plan to implement the EPSEN Act. This important piece of legislation must be implemented to support young people with SEN at second level school.

The Programme for Partnership Government states that "We will examine the adequacy of current special education access and funding provision, in particular for children with Down syndrome". While we appreciate that the Department has been involved in High Court cases in relation to the education of children with Down syndrome, it is contrary to the development of child centred systems to focus on any one particular disability or diagnosis when we should be striving to plan for children's educational needs on an individualised basis, not by diagnosis. The development of such systems in the future will continue to be driven by legal cases rather than what is right, if we carry on planning on a reactionary basis rather than having an overall vision for special educational supports.

Please see previous submissions from Special Needs Parents Association on special education at <http://www.specialneedsparents.ie/about/snpe-publications-and-submissions/#.V1hGavkrLIW>

Q30: 7(b) How should progress on Special Needs Education be measured?

Development of an outcomes measurement framework.
Tracking of placement breakdown and restricted school days
School Inspectorate Reports

Q31: 7(c) What would you consider to be the priority actions and outcomes in this area?

Roadmap and costings to fully enact EPSEN Act 2004.
Establish an Independent Appeals Office for all Department of Education schemes.
Establish an Office of Ombudsman for Education

Q32: 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).

Respondent skipped this question

Q33: 8(b) How should progress on Meeting the Skills Needs of the Future be measured?

Respondent skipped this question

Q34: 8(c) What would you consider to be the priority actions and outcomes in this area?

Respondent skipped this question
