



IPPN Submission to the National Council for Special Education

NCSE Strategy 2022 - 2026

May 2021

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1 INTRODUCTION

IPPN thanks the NCSE for the opportunity to provide input to its strategy for the 2022-2026 period. Special Educational Needs (SEN) is an aspect of school leadership and management, and indeed of teaching and learning, that poses significant challenges for schools, such is the complexity of needs, expectations and compliance that schools are asked to manage. SEN is also an aspect of their work that members often report feeling incredibly proud of, as they and their dedicated staff seek to make their schools inclusive to all children enrolled, and their families, and pride themselves on doing all they can for those children, albeit at a cost to themselves.

As a core part of IPPN's advocacy work on behalf of members, we seek to engage directly with school leaders to inform our position on any aspect of education on which we are asked to provide comment, input, a submission or a presentation. Due to the time constraints involved in providing input to the NCSE Strategy, we were not in a position to consult our members widely, as we would seek to do in relation to any significant policy matter. The end of the school year is always a very busy time of year for schools, and the pandemic continues to pose additional challenges for schools, not least in relation to day-to-day staffing.

Consequently, IPPN's observations in this submission are limited to those of the IPPN leadership team, as well as 16 primary school leaders – all IPPN members - who provided input. The 16 members comprise 9 administrative principals, 3 teaching principals and 2 deputy principals. This is not reflective of our membership as 56% of our member schools – and of schools overall – are led by teaching principals. It is the best we could achieve in the few weeks available.

The school leaders who provided input have an average of 5 SETs, 7 SNAs and 2 special classes, although several schools have no special classes. As there are 1838 special classes in 962 schools, according to the NCSE data provided in December 2020, this is reflective of schools generally.

We were asked to answer specific questions about NCSE's goals and actions. To answer those questions, we had to understand in some detail the issues as experienced in schools by school leaders, so as to present our thinking in terms of concrete goals and actions that would resolve those

challenges in the time period covered by the strategy. Our submission is therefore set out in relation to key challenges relating to SEN, the goals to be included in the NCSE strategy and the actions required to achieve them.

2 KEY CHALLENGES RELATING TO SEN

The key challenges can be grouped into three categories – funding and resourcing, processes and procedures, communication and decision-making.

2.1 FUNDING AND RESOURCING

A common theme among IPPN members' queries and feedback in relation to the NCSE Strategy is the feeling that **children are not placed at the heart of decisions**. The perception is that money/budgets/available funding drive all decisions made, whether by the Department or the NCSE, and that **not enough is being done to match the needs on the ground with adequate funding** to provide appropriate staffing levels and to resource equipment, learning resources, professional development for teachers and SNAs, and other needs. **Very high expectations are placed on schools** to provide the very best possible education and environment for children with additional needs, **yet the resourcing required to deliver this is not always provided to schools**.

The allocation of SEN resources based on the school profile is considered to be inadequate by many school leaders. The pilot of the new SNA allocation model was very small in surfacing all of the key issues schools of varying types and sizes will face when it is implemented, and it remains to be seen whether it will be any better in meeting the needs of children and in reducing the challenges experienced by schools in terms of administration and communication.

Professional development of teachers and SNAs is wholly inadequate. The PDST programmes that specifically supported school leaders in dealing with disadvantage and special needs were disbanded. This indicates a lack of awareness of the critical importance of ensuring that school leaders and all school staff are fully aware of best practice in supporting children from a disadvantaged background and those children with SEN.

Another point made by many school leaders is that **too much emphasis is placed on primary care needs, and not enough on complex behavioural care needs**, which can often be equally challenging for the child and for the teacher to manage and are a clear barrier to achieving potential, not to mention the general disruption it causes to everyone in the class.

Children with **mild and moderate learning difficulties would potentially benefit from enrolment in a special class designed to meet their needs**, as many do not cope very well in larger classes as they don't have adequate access to an SNA.

Schools report that **acquiring specialist therapeutic supports for children is very onerous and time-consuming**, and often requires liaison with several service providers to meet the needs of an individual child. Having speech and language, occupational therapy, physiotherapy and other such therapies administered centrally by one organisation – ideally the NCSE - would alleviate many of these issues and would doubtless be more efficient and cost-effective also. The NCSE is the lead organisation for a demonstration project to provide therapeutic supports in schools and has responsibility for implementing the School Inclusion Model in a number of areas, which is a further expansion of this project providing more wrap-around support services to schools. **The NCSE should continue to lead this project until it has been expanded to include all schools**

Hundreds of schools have set up special classes in the past few years. Anecdotally, it appears that **the resources, CPD and supports that schools need to establish special classes come far too late** and are often inadequate e.g. no extra ancillary grant funding is provided. This puts considerable pressure on schools – principals, teachers, SNAs, ancillary staff – at a time that should be a very positive time in schools. It also **creates a system problem** in that other schools witness these problems – teachers talk to each other! - and are more reluctant to embark on that process themselves, as they are not confident that the resources will be available when needed. This narrative needs to change to remove any remaining barriers to providing the capacity needed across the system to meet children's needs. IPPN will be gathering data in relation to the experience of schools who have set up special classes over the past five years and will share that information with the NCSE when it is available.

There were a few comments that **assistive technologies require review** as there are many lower cost options now available than those recommended, for example, low-cost apps that can be downloaded onto a child's device to help them engage with their learning more readily than other technologies that cost far more to provide and maintain.

2.2 PROCESSES AND PROCEDURES

A repeated refrain from school leaders relates to **overwhelming amounts of paperwork/ bureaucracy/ repeated requests for the same information/ cumbersome application processes** - this causes enormous frustration as it is far too onerous for schools, and especially challenging for the almost 60% who are led by teaching principals, who simply don't have the time to deal with inefficient processes. One school said it was asked for bar charts, flow charts and Excel spreadsheets as part of their application for resources – this is completely unrealistic. The NCSE has itself stated that some of the processes are onerous to manage. A simpler process - with very **clear criteria and guidance about what schools need to do to show they meet these criteria** - would be a win/win.

Schools find it very difficult to plan in a timely manner – they need to have **clear timeframes within which they can work re. applications to NCSE for equipment, SNA supports, exceptional reviews** etc. and a clear outline of what families and schools can reasonably expect, and by when. Regarding timelines, July and August should not be considered part of the school year as school staff are not available and should not be expected to manage recruitment and other processes during school closures.

The allocation of supports or review of same is not conducted in a timely fashion - there can be delays of several months in terms of getting a decision, then more delays due to the cumbersome nature of the current appeals processes.

The professional voice of the school leader and teacher is not acknowledged or taken into account - more weight is given to clinicians' reports and evaluations than to the expertise of those who work most closely with the children on a day-to-day basis and know what support is needed to help them achieve their full potential – their teachers and school leaders. This was also mentioned in relation to referrals to special schools.

2.3 COMMUNICATION & DECISION-MAKING

The time taken to get a decision made is a clear issue for schools. One school provided details of a communication flow in relation to a request for additional resources for one child - after an entire year of back-and-forth communication between the school, the SENO and the NCSE, no additional supports or resources were provided. This story is not unusual.

The role of the SENO has come up in all our discussions with members in relation to SEN. While many SENOs are very conscientious and do their best to support schools to help children with additional needs - and to support schools with often challenging communication with parents - there are too many instances of inconsistency across geographical areas in terms of how resources are allocated, what parents are told to expect vs what schools are provided with, as well as the timeliness of communication around decisions. This would indicate that additional guidance, support and professional development is required so as to ensure there is a level playing field in which all schools can operate.

Managing parental expectations of what can be provided by schools to meet the needs of a child is another key issue. Schools report that parents are told by the NCSE/SENO that the school has sufficient resourcing to meet the needs of their child, yet the school may have had several applications for resourcing, equipment etc. refused for that child. This is disingenuous and causes significant problems for schools. The ideology/ aims of NCSE and the reality in schools are two very different things. It could easily be avoided if the NCSE/SENO could be clear and honest about the capacity of the system to meet the needs of every child.

A related point is what is considered to be in **the best interests of the child**. SENOs often push for 'inclusion' for every child, to mean full integration within a mainstream class setting, even where it is clear to teachers and school leaders that the child is not thriving in that environment and would benefit from being placed in a special class, or a special school in circumstances where the needs are very complex.

Special schools are often aggrieved at the perception that their schools are not considered by the system to be inclusive environments. Inclusion should mean being placed in a setting that can fully meet the child's needs, and enabling them to reach their full potential and this is very much the objective in each of the 135 special schools in Ireland.

3 NCSE GOALS AND ACTIONS FOR 2022 - 2026

The following comment by one school leader encapsulates the goals and actions succinctly:

“The NCSE needs to embed practice and structure that will ensure that:

- a) children, not funds, are placed at the heart of allocations*
- b) communication with individual schools is clear*
- c) timelines are clear (e.g. it will take 'n' days to process your query)*
- d) the NCSE has adequate structures and capacity in place to ensure that NCSE staff can support schools effectively and make and communicate decisions in a fair and timely fashion.”*

3.1 GOALS

IPPN sets out here the key goals that school leaders would like to see reflected in the NCSE Strategy for 2022-2026:

- **In conjunction with the DE, to provide funding support and guidance to schools** to ensure that every child in the school has equal chance of achieving his/her/their potential.
 1. To **put the child at the heart of every decision** made by the NCSE.
 2. To **change the narrative around special education** – in-class support, withdrawal, special classes and special schools – as positive, inclusive places in which to educate children, to reduce resistance and stigma for children and families
 3. To **simplify and clarify all procedures** – applications and appeals - to remove duplication, centralise documentation and reduce the timescales for decision-making to an absolute minimum
 4. To **increase the capacity of NCSE to provide support and guidance to schools** as needed
 5. To **provide CPD for all NCSE staff who engage with schools** – to raise awareness of how schools operate and what they deal with day to day, to improve consistency of decision-making and to ensure equity across all schools in terms of resourcing

6. To **centralise specialist therapeutic services** to more effectively meet the needs of children in schools, remove the barriers to access, reduce cost and greatly reduce the amount of time it takes to provide services. As noted above, the NCSE should continue to lead the demonstration project to provide therapeutic supports in schools **until it has been expanded to include all schools.**
7. To **provide CPD for all school staff who engage with children with SEN**
8. To **build inclusion best practice in ITE programmes** in all teacher training colleges.

3.2 ACTIONS

Each of the above goals is relatively clear and a specific set of actions can be readily articulated. School leaders are best positioned to work with the NCSE in specifying what will work best on the ground in schools, and that needs to be where the process starts. IPPN would be happy to facilitate such engagement.

The following actions are also required to achieve the goals outlined:

1. **Professional development for all teachers and SNAs who are supporting children with special educational needs** is vital, and is an area in clear need of funding and structured provision. The NCSE should work in partnership with PDST in providing more specialised CPD for those supporting children with dyslexia, dyspraxia, Autism, EBD and other common challenges that, without appropriate supports, can prevent them from achieving their full potential.
2. **Inclusion also needs to be a mandatory part of Initial Teacher Education** to ensure that all teachers have at least a basic awareness of best practices in supporting children with SEN.
3. **Review the role of the SENO and the CPD provided to all NCSE staff**, to ensure consistency and best practice. Consider involving the SENO more in the admissions process, particularly in relation to school capacity, to improve the communication with and expectations of parents.
4. **Review communications with parents and with schools** to ensure expectations are clearly managed and in line with the resources provided to schools, and that communication is made in a timely and efficient manner.

5. **Clearly communicate the criteria that are applied to applications for funding, equipment, staffing and other resources** – and the documentation required by the NCSE to support applications/reviews.
6. Where schools have provided **key information** within a given timeframe (1-2 years), that **should be accepted as an accurate picture of the school and its SEN/resourcing**. At most, they should be asked to confirm whether anything material has changed since the last submission of information, and only updates requested.
7. **Frontload resources and supports to schools who are opening a new special class** – to remove all the barriers for schools and children.

4 CONCLUSION

Children need to be *seen* to be at the heart of all decision-making - by schools, by education agencies and by the Department of Education. Providing adequate supports to children in their earlier years gives them the best possible start and helps them to achieve their full potential, both as they grow and as adults. Not investing in these supports early on effectively ‘pushes the problem’ down the line, and can lead to dysfunction, distress and disadvantage, not to mention higher social, economic and other costs which will be borne by the individual, their family, wider society and the Exchequer.

We hope that this submission will help inform the NCSE strategy in the next 4-5 years, to more effectively meet the needs of all children with additional needs in our primary schools. IPPN looks forward to an opportunity to discuss these suggestions with NCSE in more detail. As mentioned above, school leaders are best positioned to work with the NCSE in specifying what will work best on the ground in schools to achieve the goals as set out here, and that needs to be where the process starts. IPPN would be happy to facilitate such engagement.