DES Data Strategy

IPPN Submission

September 2016

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1   INTRODUCTION

This document was prepared by the Irish Primary Principals' Network (IPPN) in September 2016 in response to the Department of Education & Skills' (DES) invitation to provide input to the DES Data Strategy 2017-2019.

IPPN has participated in a consultation process with the DES and other education partners in relation to the development and implementation of the Primary Online Database (POD) over the past few years. This submission will reflect the input and feedback provided during that consultation process and will also highlight the significant administration burden still posed in relation to the duplication of information requests by the DES, other government departments and Education Agencies. In this regard, IPPN submitted a report on Administration Burden to the DES in February 2014. While there has been some alleviation in terms of the volume of information requests received by schools due to the introduction of the POD, there remain significant issues. The key points from that submission are included in this submission and in the appendices.

IPPN has supported the development of the POD and would like to see its vision fully realised, if it is to reduce the administration burden in primary schools. It is hoped that the recommendations and suggestions raised here will be included in the DES Data Strategy 2017-19 and we would welcome an opportunity to clarify any queries the DES may have. In addition, we believe that the establishment of a working group to agree and discuss specific POD developments, such as the inclusion of relevant SEN information, would be essential to maintain momentum and achieve the vision underpinning its introduction.

2 DEVELOPMENT OF THE PRIMARY ONLINE DATABASE

2.1 ADMINISTRATION SYSTEMS IN SCHOOLS

IPPN has been very vocal for many years in relation to the need for a database to track pupils in primary schools and provide the sort of administration system in primary schools that post-primary schools have had available since 1991.

While many larger schools, though by no means all of them, have been in a position to invest in specialised software to manage school administration over the past decade or so, most small schools have not had the capacity for such investment. Instead they had to rely on ad hoc, non-standard, low-cost solutions to meet their administration needs. Inevitably, such systems have not provided the same sort of benefits as their more advanced counterparts. This has led to a situation where those schools with the least administrative capacity (time, skills and resources to handle administration) have had the poorest administration systems and are therefore the least able to meet the administration needs of the DES, education agencies and others – including the ability to supply accurate, relevant information in a timely manner.

Indeed, the lack of a centralised system and related supports also means that even those larger schools that invested in special software have had to design and manage their administration processes themselves, for which they have not been trained, and therefore there is no uniformity and standardisation of approach across schools. This leads to inefficiencies and higher administration costs than would be the case if all schools were to have access to a fully-funded, fully-supported centralised administration system with standardised training provided to those using it.

2.2 THE ADVENT OF THE POD

Having said that, IPPN welcomed the advent of the Primary Online Database as it was felt that, though it did not provide a centralised, fully-supported centralised system across all schools, it would at least be a step in the right direction.

Not all schools have had the capacity to make full use of its introduction, due to the lack of administration support and the fact that training was offered only to one individual in each school. However, it has certainly eased the process for gathering and disseminating statistical data about pupils to the DES that had previously required the annual statistics form to be completed, a very onerous and tedious process. Furthermore, it has provided some consistency and standardisation across schools. While there remain issues about the embedding of good administrative practices in schools, with additional training and support, the POD should become a beneficial tool in all schools over time.

Another issue schools have raised is the 'changing goalposts' whereby data categories and templates are being changed in an ad hoc manner, causing disruption, frustration and above all, more work for schools. Any required change in the way data is categorised and managed needs to be agreed across agencies and managed in a streamlined, coherent way, ensuring schools are well informed in a timely manner.

2.3 FUTURE DEVELOPMENT

IPPN would like to see the POD develop to include relevant information about pupil special educational needs (SEN), which could be shared with the relevant agencies. SEN administration is complex, and the burden of dealing with multiple queries from different agencies about each child for whom additional support is sought is considerable. Such development, provided it was well designed and managed, would certainly be very beneficial in helping to alleviate the administration burden on schools. As mentioned in the Introduction, we would welcome the establishment of a DES working group including the HSE and other departments as well as education partners, to explore how this, and other POD developments, could best be dealt with.

In 2014, the NCCA developed an SEN Transfer Form to help the transition of pupils with special educational needs from primary to post primary, and between primary schools. The information contained in this form (See Appendix 3) would be a useful starting point for the development of an SEN section within the POD. A critical success factor in this regard would be the adoption of an agreed, common set of SEN categories across Departments, sections within Departments and across systems. Otherwise, the ability to identify and track pupils and cohorts of pupils within and across Departments, especially the linkages between primary and post primary, will be greatly curtailed. IPPN support the DES desire, as stated in Data Strategy 2008-2010, to pursue the 'development of coding frames for SEN, social needs and ethnicity' with the CSO, DFSA and the Equality Authority.

Furthermore, principals would like to see additional data fields to be developed to allow smaller schools to use the POD to meet their key administration needs without the need for additional administration systems. A consultation process to determine the information and administration needs of such schools as well as training of administration staff would be required to ensure best use of resources and investment.

The other key issue in relation to the POD is access to the data by the DES and its agencies. This is dealt with in more detail in the next section – *Administration Burden in Primary Schools*.

3   ADMINISTRATION BURDEN IN PRIMARY SCHOOLS

The DES *Data Strategy 2008-2010* highlighted the need to alleviate the administration burden on our schools. IPPN was heartened that a stated key goal was to 'maintain standards of data quality, confidentiality and governance with a view to minimising the burden on data providers and meeting the needs of all users' and also that a Central Data Quality Unit would be established and would advise on the 'relevance and impact on data burden' of all new data surveys of the DES and its agencies. The Strategy also talks about the principle of 'non-excessive burden on respondents' as regards a Statistics Code of Practice. Successive Ministers for Education have spoken of their support for the elimination of duplicate requests for information and the alleviation of bureaucracy in schools. The advent of the POD has gone some way towards this but there is a long way to go to realise the full vision underpinning its development.

The key points presented in this chapter were included in IPPN's submission to the Department in February 2016 – *Administration Burden – Information Requests to Irish Primary Schools*. They have been updated and revised to take into account the introduction in 2015 of the Pupil Online Database.

3.1   SCHOOL RESOURCES

The Department conducted interviews with the principals of 20 primary schools and 2 special schools as part of its review of administration burden in schools in 2014. As that process confirmed, many schools do not enjoy the support of a full-time administrator / secretary or a dedicated office or storage space for school records. This can have a significant impact on a school's capacity to respond to and deal with requests for information. Teaching Principals - 60% of all principals - are least likely to have administrative support, thus reducing the administrative burden is particularly important in reducing their well-acknowledged work overload. While the new POD has facilitated the sharing of administration and statistical information, data gathering and updating of the POD remain very challenging for smaller schools in particular as a consequence of administrative capacity.

3.2   REDUCING THE ADMIN BURDEN

IPPN believes that moving all shared information online, whereby schools will be in a position to maintain their school profile/pupil/staff data centrally, is a crucial way to alleviate the administration burden on schools. The introduction of the POD has been a very positive step in that regard. The other key element of the vision for the POD, if it is to really alleviate administration burden, is to grant access to the DES and education agencies to the level of information they require in order to run school-related reports, to collate data for aggregate reports, to grant resources, to process payments, and so on.   This part of the vision has not been yet been realised, primarily we understand, owing to data protection issues.

There is considerable and justifiable concern in relation to the protection of information pertaining to individuals (pupils, parents and staff). However, if other large organisations with private and confidential information can successfully operate online systems for their administrative functions, it

should be possible for the Department and its agencies to do the same. It will clearly require the DES to devise robust security features including well-managed user profiles to guard against unauthorised access.

The volume of queries by education agencies and the various sections within the Department remain a critical issue for primary schools. Progressing the issue of access to POD data by those who need it is a critical priority in alleviating administration burden in schools.

Appendix 1 lists the various sections/units of the DES as well as other education agencies that seek information from schools; the type of information sought; the timing of the request and its purpose. This list is not exhaustive. Examples of ad hoc requests for information of schools that we do not envisage be captured in an online database are captured in Appendix 2 for completeness.

3.3 INFORMATION SOURCES

Another key concern shared by principals is the expectation that schools are the appropriate place to gather (and even, sometimes, to 'guesstimate') very sensitive, private information about pupils and their families. This is particularly the case in relation to socio-economic information, ethnic and faith backgrounds and other such information. IPPN believes that the Department (in fact *all* Departments) should gather this information directly from families using the PPDS number. Indeed, the Department's own Data Strategy 2008-2010 suggests that 'direct data collection from students and households' should be considered (Appendix 1, p53).

Appendix 4: Information sought from multiple organisations

There is an enormous amount of duplication of information requested of schools, in relation to general categorisation information, staffing levels and types, individual children and compliance with various guidelines. Much of this is still happening today, despite the development of the POD.

Who	What	When	Why
HSE - Local Health Centre	Lists of students and parents for Junior Infants and 6th class - For immunisation programmes they require class lists with names, dates of birth, telephone numbers and addresses of pupils.	Throughout the year	Vaccinations, hearing and vision
HSE - Dental clinic	Lists of students and parents in specific classes	Throughout the year	Screening
Child & Family Agency	Child Protection Referrals and Case Conferences : These conferences require detailed information and reports on the child	As need arises	Child Protection
	School Attendance Returns to be made on children who have missed 20 days or more from school and the reason for each individual absence. An annual return to be made by mid- July after the school is closed.	When a child has 20 days absence	Attendance tracking
	School Completion Programme – target pupil lists, numbers	As required	Attendance tracking
	Information regarding suspension and expulsion of pupils and Section 29 appeals	As required	Suspension and expulsion of pupils
DES- Statistics	**Roll Book (Leabhar Rolla**): To record the name, address and registration number of each child together with a daily attendance record, a total attendance for each quarter and a total annual attendance.	Daily Quarterly Annually	DES statistics
		Daily	DES statistics. This can now be

Who	What	When	Why
DES- Statistics	**Attendance Book (Leabhar Tinrimh**): To record the total daily, weekly, monthly and yearly enrolment and attendance for each class, the average monthly, quarterly and yearly enrolment and attendance, correct to two decimal places together with the overall average attendance for the school.	Weekly Monthly Annually	done online cf Circular 28/13.
	Annual Statistics Form: This requires information on enrolment, age of pupils, number of pupils at each age level, number of pupils in each class, number of new entrants and their source, number of school-leavers and their destination including the names of the second level schools to which they went, number and category of teachers, number of children with SEN in mainstream classes and in Special Classes, number who are integrated and with which mainstream classes, numbers in each class attending Learning Support, number of travellers and term census	Early October – based on September 30th Data	Grant calculation, DES statistics
DES - Primary Payments	Salary Returns giving information on teacher's position in the school, teacher's status etc.	Annually	Confirmation of staffing
	Returns for part-time resource teachers, language support teachers	Fortnightly	Payments
	Teacher absences, principal release days, maternity leave etc.	Weekly	Online claims (OLCS) Payment of teachers
DES - Teacher Education	Summer course certificates for teachers availing of EPV days	Annually	DES Requirement
DES - Social Inclusion/ Child & Family Agency	Applications for school meals	Annually	Breakfast and lunch clubs for children who need them
DES	Teacher allocation	End of year	To confirm numbers of teachers

Who	What	When	Why
DES	STen scores	End of year	DES Statistics
DES Planning & Building Unit	Prefab replacements applications	As required	Replace prefabs
	Planning and Building of major schools projects, Minor Capital Works, Summer Works Scheme Application	As required	Grants for building works
	Emergency works applications	As required	Request for funding for school maintenance
	Furniture applications when granted new room (increasing enrolment)	When granted new room	Grant for furniture
	ICT Grant application when granted new room	When granted new room	Grant for ICT
DES - School Transport Section	Information including the ordering and distribution of bus passes for eligible pupils, informing the bus company of pupils leaving the school etc.	Termly	
DES/ERC	Form to establish the level of disadvantage in a school - requires information on the socio-economic profile of all pupils under the following headings: Parental unemployment, local authority housing, medical card, farm income supplement together with information on standardised test results in various classes	As required	DEIS programme
DES Governance Section	SNA Redundancy Forms	After notice given to SNA	When SNA made redundant
	Vacancy notification	When school becomes aware of vacancy	Panel operation
	Teacher appointment form	When teacher employed	Payment of teacher
	Learning support clusters	End of year	When a cluster is created
	Resource clusters	End of year / beginning of year	When cluster is created

Who	What	When	Why
	Application for part-time hours	End of year / beginning of year	If 5 base schools cannot accommodate hours in their allocation
	School calendar	Start of year	Request on OLCS
DES Schools Financial Section	Assistive Technology applications (3 quotes and application form)	As need arises	Purchase of assistive technology for pupils with special needs
	Application for Free Book Grant	Annually	
	Book Rental	Annually	DES Requirement
Inspectorate	Report on use of Croke Park Hours	End of year	Compliance
	Adoption of Children First, annual audit of policy	Annually	Compliance
	Information on teaching staff, position in the school and the number of teachers for diploma examination	September Prior to inspections	To plan inspections
	School calendar, break times	Annually	To plan inspections
	School Information Form	WSE	Gather information about the school
NCSE/SENO	Audit of pupils with SEN and the resources they receive, their psychological reports and other relevant reports together with letters of sanction from the DES	As required	SEN resources
	Audit of pupils who have the services of a Special Needs Assistant.	As required	SEN resources
	Resource Teacher/ SNA applications. Application for resources for pupils with low incidence SEN is made through the Special Education Needs Organiser (SENO)	Deadline varies	Apply for resource hours and SNA positions
	Transition of pupils to secondary Form	Feb / March	Transfer data to secondary schools
	Application is made to NEPS concerning pupils with SEN with a view to the pupil being assessed and being able to apply for resource teaching hours	As required	Assessments

Who	What	When	Why
NEPS	and/or the services of an SNA		
	Parental consent forms	During assessment / review	For assessments
	Pupil standardised tests results, non-standardised tests results, class tests results	During review	School review to assess needs of school
	Critical Incident Plan Code of Behaviour	Annual Review	Compliance
Occupation Therapist	Referral forms	When referral made	Referral of child
Speech and Language Therapist	Referral forms	When referral made	Referral of child
Child and Adult Mental Health Service	Referral forms, review forms	When referral made	Referral of child
Teachers	Print of OLCS	Termly	Requirement of new circular
Substitute teachers	Maintenance of list of available substitute teachers	As required	DES requirement. Circular 31/2011 Section 5.1
Staff	Contracts	After appointment	Legislative requirement
Ancillary staff	Payslips	Weekly	Compliance
Parents	Confirmation of enrolment status to all parents – successful and unsuccessful applicants. Inform those who didn't get a place that they can appeal.	After enrolment process completed	Inform parents of enrolment
	Notification of 20 day absence	When child is absent for 20 days	Compliance
	Confirmation of previous enrolments	When need arises	To support planning permission applications
	Confirmation of children's enrolment	Communion / Confirmation time	Grants for Communion and Confirmation
	School Reports and standardised test results 2nd and 5th	End of year but before school closes	Parent information
Parents/Clergy	Where applicable, information on children taking sacraments and their parents	Annually	To organise ceremony/rehearsals
	Vacancy Notification	When school	Panel operation

Who	What	When	Why
Patron's Office		becomes aware of vacancy	
	Appointment of a teacher	When teacher employed	Management information
	Notification to remove teacher off panel	When teacher employed	Panel operation
	Code of Behaviour Anti-Bullying Policy Enrolment Policy	When reviewed	For approval
	Garda Vetting forms	As required	Child Protection
	School statistics	Same time as Census	Statistics
	School accounts	On request	Compliance
Diocesan Advisors	Numbers of classes and names of teachers	As required	Management information
Accountant	Annual account audit	Usually in September	Legislative requirement
Revenue	RCT, P30 returns, VAT	As required	Audit of compliance
	Employers PRSI	Monthly	Payment of tax
Secondary schools	School Reports (See Appendix 2)	June	Transfer of data to secondary school
	Request for further information on children (See Appendix 2)	June	Transfer of data to secondary schools
Other Schools	Notice that child has enrolled in our school	When enrolled	Child & Family Agency (NEWB)
	School Reports of children who have transferred to another school	When enrolled	To inform new school on pupil ability
	Certificates of transfer	When child enrolled in new school	To inform old school where child has moved to
Local Education Centre	Teacher contact details	Start of year	So they can contact teachers about courses
	Staff lists for in-service training	Start of year	In-service training

Who	What	When	Why
Medmark	Referral of teacher	When need arises	Assessment of fitness to return to work
PDST	Training requirements	Annually	Professional Development
Local sporting organisations	Competition entry, student numbers in various classes	Throughout the year	Enter sporting competitions
SESS	Staff training requirements in relation to children with challenging special educational needs	When need arises	Staff training
Colleges of Education/ Third level colleges	Requests for school placement Requests from students for completion of surveys		School placement for student teachers
The Teaching Council	New Teaching Council *Guidelines for Student Placement* and the increased duration of Initial Teacher Education courses place more specific responsibilities (and information requests) on the principal and the cooperating teacher(s).	Throughout the year	School placement for student teachers

Appendix 5: Ad hoc Information Requests

In addition, there is a significant number of ad hoc / one-off requests for information from various agencies. It is not envisaged that these information categories be included in the POD. The information is included to provide a more rounded picture of the administration burden in primary schools.

Who	What	When	Why
Courts	Section 20 Appeal – considerable paperwork for the principal if parents bring an appeal		Parents appeal a decision to not enrol their child
Parents	Annual Report on school activities	End of year	Education Act Section 20. Optional.
Parents	Consultation on policies	As required	Partnership
Parents	School Self Evaluation Report	End of year	To keep parents informed on school priorities
Inspectorate	School Improvement Plan School Self Evaluation Report All school policies and Procedures School Register Leamhar Tinreamh monthly print offs Roll books Teacher timetables Teaching Principals – fortnightly plans, Termly/yearly plans School accounts In-school Management Meeting minutes Board of Management Meeting minutes Staff meeting minutes	Prior to WSE	Compliance
Electoral Returning Officer	School key-holder for elections	Elections	Use of school
BoM	Record of bullying incidents	As required	Bullying Reports
Student teachers	School Placement requests. Filling in of related documents. Arranging and monitoring of student placement. Meeting and reporting to visiting supervisors.	Various times	Facilitate teaching practice
Transition Year	Requests from students for Work Experience Placements.	As required	Work experience

Students	Supervision, monitoring and reporting on the placements.		
Health and Safety Authority	Annual Audit by BoM on health & safety	Annually	Compliance
Insurance company	Record of pupil injuries	Daily	Health and Safety / Accident Reports
Discipline Reports	Record of serious misbehaviour	As required	
Juvenile Liaison Officer	Specific information about individual pupil(s)	As required	
Immigration	Confirmation of past enrolment from Foreign National Parents	As required	Verification requests
Department of Foreign Affairs	Passport Office	As required	Verification requests
Parents Council	Fundraising approval etc.	Annually	Requires BoM approval
Bus Éireann	School Calendar	End of year	

As well as the above specific requests for information, schools provide information to the following organisations on an ad hoc basis:

Education Agencies
- National Council for Curriculum & Assessment (NCCA)
- Educational Research Centre (ERC)
- Substance Misuse Prevention Programme
- Léargas, The Exchange Bureau
- National Centre for Technology in Education (NCTE)
- National Safety Council
- The Teaching Council
- The Equality Authority
- The Commission on School Accommodation
- Irish Primary Principals' Network (IPPN).

Other Parties
- Courts
- Solicitors
- Insurers
- Local authorities
- Local partnership groups
- Local churches
- Relocation facilitators
- Sporting organisations
- Media
- Returning officer
- Multiple commercial enquiries
- TDs enquiring about the enrolment of specific children.

Appendix 6: NCCA Draft SEN Transfer Form

A revised Summary SEN Transfer Form will be made available by the NCCA when the new model of SEN allocation is introduced by the Department. They expect this to be 2015/2016. These data categories are indicative only.

Provisional categories

1. Assessments

(a) School assessments. Screening and/or diagnostic tests were administered. No __ Yes __

(b) External assessments *Consult with child's parent to access reports*

Assessment	No	Yes	Date	Assessment	No	Yes	Date
Educational psychologist				Occupational Therapy			
Clinical psychologist				Physiotherapy			
Speech and Language				Psychiatric			

2. Identified learning need(s)

(a) Special Educational Needs *Please tick where appropriate*

High Incidence:
Borderline Mild General Learning Disability ___ Specific learning disability e.g. dyslexia, dyspraxia _____
Mild General Learning Disability ___
Low Incidence:
Physical disability ___ Severe emotional disturbance __ Assessed syndrome ___ _____
Deaf/Hard of hearing ___ Moderate General Learning Disability __ Specific speech and language disorder ___
Blind/Visual impairment ___ Severe/Profound General Learning Disability __ Multiple disability __
Emotional disturbance ___ Autism/autistic spectrum disorders ___

(b) Other learning needs *Please provide details below*

While needs listed here are not categorised by the DES under either High or Low incidence, the school has provided support for the child during in-class Learning Support hours.
Literacy ___ Mild speech and language difficulties __ Exceptionally able ___
Numeracy ___ Mild social or emotional difficulties __ Other _____

3. In-school supports *Please complete where applicable*

(a) Special Educational Needs

High incidence		Low incidence		Assistive technologies	
Learning support		**Resource teaching**		**Special Needs Assistant**	e.g. laptop, braille, FM system, screen reader software
Purpose	**Hours**	**Purpose**	**Hours**	**Purpose**	**Hours**
Literacy Numeracy EAL __ Other* _____		Literacy Numeracy Other* _____		Significant care need arising from a: Medical condition _ Sensory impairment _ Behaviour that is a danger to the child or others _	

*e.g. Communication skills, social skills, behaviour development, life skills.

(b) Other learning needs *Please provide details below.*

In-class differentiation strategies ___ Other support