

**Teachers’ Union of Ireland (TUI) Response to National Council for Special Education (NCSE) Working Group Report**

***Delivery for Students with Special Educational Needs***

**(September 2014)**

# TUI represents teachers (10,000+) employed by Education and Training Boards (ETBs) and in Community and Comprehensive (C&C) Schools. Department data on enrolment patterns indicates that most schools enrol some students with special educational needs (SEN). However, close examination of all relevant data indicates that schools in the ETB and C&C sectors enrol, by far, the largest proportion of students with special needs, representing a vast range in terms of the type and level of need experienced by individual students. Consequently this leads to considerable variation in the additional support required by individual students and schools in order that SEN be addressed effectively and in a manner that ensures all students are appropriately supported in achieving their potential.

TUI, therefore, welcomes any effort by the NCSE and Department to ensure that resources are deployed in a fair manner in the interests of the students with special needs and the schools providing services to them. It emphasises that any new allocation model must be true to the already established principles that resources should be directed at students with the greatest need and who would benefit from early intervention. The focus of support at post-primary must therefore be on sustaining appropriate support for students whose special needs have already been identified at primary level and are on-going and on early intervention of special needs which have not previously been identified at primary level or that emerge after arriving in the post-primary school.

**Overview**

The broad thrust of the document is interesting particularly in the context of student and school need being the key criterion for the awarding of additional resources. TUI also welcomes the objective of the NCSE in minimising the administrative burden on schools in a time where TUI contends that our members are overburdened due to cutbacks. The assurance given regarding the availability of existing resources is welcome:

“There will be no reduction in the overall allocation of additional teaching resources to schools” (p.9).

However, as stated below, the new Resource Allocation Model (RAM) may in fact require additional resources above and beyond those currently available.

**Background**

A commitment to implementing the EPSEN Act is essential if provision for students with SEN is to be adequately and appropriately addressed. This is especially true if the ‘integrated model’ advocated is to be a positive experience for all students.However, full implementation will only be possible when sufficient resources are allocated toprimary and post-primary schools. Almost ten years ago, TUI emphasised that schools were not sufficiently resourced to implement specific elements of the EPSEN Act, in particular designing and delivering Individual Education Plans (IEPs) for SEN students.

In 2014, schools are in receipt of far fewer resources as a consequence of austerity measures since 2008. Most pertinently, the moratorium on posts of responsibility has diminished capacity to establish special needs departments or otherwise plan and co-ordinate related activity in most schools. In addition, a worrying level of casualisation has emerged and the expertise of many teachers with particular qualifications and training in special education is lost as schools cannot deploy staff to best effect. Furthermore, the Department of Public Expenditure and Reform has removed the allowance payable to teachers who hold a Postgraduate Diploma in Special Educational Needs. It’s difficult to see how the Government values the work of teachers who have pursued a qualification in SEN when the Government has removed the allowance for that qualification. Likewise, in the current context of much reduced staffing (fewer teachers and middle management posts, removal of ex-quota guidance posts, removal of enhanced allocations for areas such as Travellers and ESOL) many schools will not be in a position to assign adequate staff time to carry out a comprehensive profiling exercise of the student population and, in particular, of the totality of special needs that exist within it.

In the interest of students TUI supports the full implementation of the EPSEN Act and embraces the core concepts of integration, inclusion, early intervention, individualised planning and monitoring of progress. However, this is somewhat impractical and overly ambitious as current government cost cutting policies in the public service are completely at odds with intention to implement. Efforts towards full implementation are laudable but TUI is emphatic that any additional work required cannot be imposed on teachers who are already overstretched on a daily basis and have suffered multiple pay cuts. Furthermore, full implementation would place considerable additional demands on other public services, in particular, the HSE. A measured and considered approach to managing the deployment of national resources is therefore critical and realistic expectations of what is achievable at school and service level are essential.

**Specific Elements**

There are a number of points that TUI would like to make regarding aspects of the new model.

Positive aspects as viewed by TUI:

* The pragmatic view that diagnosis of disability is delaying the allocation of resources to students. However, the case of low incidence, high needs may need to be factored in.
* The ongoing commitment to minimise social disadvantage.
* The view that providing equality of educational opportunity to students with special educational needs should not depend on whether parents can afford to pay for a diagnosis. However, in some cases funding for a diagnosis may still be required. That diagnosis may be a key factor in staff and students being able to support the student in learning essential lessons in living a fulfilling life.
* The recognition of “a spectrum of ability and disability within every category of special educational need” as long as it is well defined.
* The acknowledgement that standardised test scores may need to be supplemented by other data such as levels of emotional and behavioural disorders.
* The citing of evidence that there is “a gender imbalance in the incidence of disabilities, special education enrolments and academic achievement”.
* The recognition that “it may be necessary to put in place transitional arrangements for schools where the new allocation model brings about significant changes” in staffing allocations, especially in greenfield sites.
* The inclusion of an appeals process with “clearly devised and clearly outlined” procedures.
* The recognition that some schools have disproportionately high numbers of Traveller and/or non-Irish students.
* The intention of recommendation 26 to start with “a small sample of schools” appears to be a good idea though it would be necessary for the sample to take adequate account of rural versus urban, DEIS versus non-DEIS, vocational versus secondary etc.

Areas of concern to TUI:

* TUI contends that diagnosis of disability still has a role to play. Whilst those services may no longer be needed to the same extent as today to ‘free up’ the allocation of resources to students, the services will still be necessary to support students, families and staff in minimising the impact of adversity for students with additional needs. Such support for students, families and staff could make a significant difference to improving the societal and educational function, and wellbeing of the student through providing support to the home and school.
* TUI is uncertain as to whether there is an intention by the new model to create a “systematic attempt to assess outcomes achieved by those to whom resources are allocated”. TUI has concerns as to how such a system, if intended, would be operated. Operation of such a scheme could benefit significantly from the expertise at school level of guidance counsellors, particularly in the areas of assessment and reassessment. Unfortunately, the guidance service has been subjected to cuts in recent years,
* The proposed model takes little account of the fact that some schools encounter a high proportion of students moving from one school to another even within a school year (McGorman and Sugrue, 2007; Murphy, 2007).
* The document proposes minimising the administrative burden on schools but yet requires schools to “provide annual reports to the NCSE on how additional resources were deployed, student progress made and student outcomes achieved through the learning plan process”. The proposed template should be of assistance but judgement must be reserved until the template is available for review. The report correctly identifies various forms of data that the NCSE could use without recourse to schools such as census data but doesn’t seem to make clear whether schools could further reduce the administrative burden by drawing the attention of NCSE to data already available to the Department of Education and Skills (DES) through existing sources such as the October returns, pPod, School Improvement Plans and Whole Student Evaluation Reports. Schools have had to take on many additional tasks in recent times and TUI strongly believes that there is no capacity in schools to take on further work. Cuts to guidance provision and middle management, as well as changes to inspection processes and planning systems have overloaded the education system.
* Online submission of data is more convenient to schools than a paper based model but still presents a question of secretarial or teacher time being available to make such returns. Recent cuts to supports for schools such as the moratorium on posts of responsibility and reductions in the capitation fee make it difficult to see how such resources of time and money will be available to schools to make online returns. The lesson should also be learnt from the Leaving Certificate Applied programme whereby online returns cannot be made at certain times of the school day to allow data to be uploaded. Such updates are of course a key part of modern information systems but the timing of same could be rescheduled to a time other than in the midst of the school day. NCSE should clarify how much additional resources will be available to it and to schools to make and utilise such online returns.
* Recommendation 7 makes a number of commitments to schools to enable the successful roll-out of the new RAM. Clarity is required as to whether resources will be available to enable these commitments to be met. A question also arises as to how long such supports to schools will remain in place. Furthermore, TUI seeks clarification on the proposed “mandatory training for teachers in the administration, scoring and interpretation of standardised tests”.
* It makes sense to move to “one type of standardised test…in the interests of consistency”. The DES should be obliged to supply the test, and not just to pay for it.
* The use of Junior Cycle retention rates as one of the forms of data could lead to schools being ‘penalised’ in terms of the allocation of SEN resources if they improve their retention rate. Retention rates may go up because of the new resources but that means that improvements should be consolidated rather than have resources removed and then run the risk of returning to the pre-improvement situation.
* The suggestion that schools collect “end of school outcomes” data such as “progression into employment, further and higher education, health services etc.” is an innovative concept. However, the gathering of such data for schools is time consuming and it is often difficult to accurately gather such data as “word of mouth” is often the only source available. Traditionally, such data was collected by guidance counsellors. However, as outlined above, the provision of a guidance service in schools has been cut recently.
* Whilst the consolidation of support services may allow more integrated and focused service delivery, TUI is of the opinion that the current support services are understaffed. TUI is reserving judgement on this integration pending reassurance that there will be no diminution in the support services, of any discipline, available to schools.

TUI is happy to discuss the above points in greater detail should NCSE find it beneficial.

Ends

**David Duffy (Education/Research Officer, TUI), dduffy@tui.ie**

**Colm Kelly (Assistant General Secretary, TUI), ckelly@tui.ie**

**References**

McGorman, E., Sugrue, C. (2007), *Intercultural Education: Primary Challenges in Dublin 15*, Department of Education and Science

Murphy, P. (2007), *From Bangladesh to Balgaddy*, Dublin: Clondalkin Partnership