

**Teachers’ Union of Ireland**

**Response to Inspectorate Consultation**

**(May 2016)**

TUI represents c.12,000 teachers employed by Education and Training Boards (ETBs) and in Community and Comprehensive (C&C) Schools. At a meeting regarding the proposed review of documents relating to school self-evaluation (SSE) on April 26th 2016, the Inspectorate invited submissions.

Introduction

The current draft documents constitute a significant improvement on earlier drafts and TUI would like to acknowledge the work of the Inspectorate in taking account of comments made by stakeholders including TUI. Having said that, TUI feels that some comments would be beneficial.

Draft Circular Post-Primary

No changes required. TUI welcomes the emphasis on teaching and learning.

Quality Framework Post-Primary

The clarification, on page four, that SSE is “not an inflexible check-list” is most welcome.

On page six, there is a comment that teachers should “work together to devise learning opportunities for students across and beyond the curriculum”. Many teachers are involved in providing extra-curricular and co-curricular activities but any compulsion to do so would be counter-productive. TUI welcomes the oral re-assurance given by the Inspectorate that such activities are welcome but not compulsory and asks the Inspectorate to now provide that re-assurance in writing through re-phrasing of the section.

On page eleven, a statement of highly effective practice states that “teachers’ preparation includes preparation for the differentiation of learning intentions and learning activities, including personalised learning activities”. TUI reminds the Inspectorate that TUI has repeatedly asked the DES to adequately fund the implementation of the EPSEN Act but such funding has not yet been available. Until such time as funding is available, TUI believes that Individual Education Plans cannot be provided and have informed our members accordingly.

On page fourteen, there is a statement of effective practice that states that “teachers are willing to share their expertise with teachers from other schools, through education centres, online forums, and school visits”. TUI agrees with the sentiment but has already pointed out to the Inspectorate that access to online fora and school visits is dependent on the availability of funding, technology, time and paid substitution cover. TUI welcomes the oral re-assurance given by the Inspectorate that this sentence is intended to be a list of examples or possibilities and not a check-list that must be fully completed. TUI believes that this oral re-assurance should now be provided in writing perhaps by the addition of “e.g.” in the sentence.

Page eighteen contains a sentence that is of great concern to TUI. The sentence is that “the principal meets teachers annually to discuss their work”. TUI has previously raised its considerable concern about a similar sentiment in earlier drafts of the document but would also like to acknowledge the amendments that the Inspectorate has made here. However, TUI must reiterate what it said in its previous submission:

*“Even if TUI were to disregard the fact that international management consultancy companies (such as Accenture) which have made significant sums designing such programmes for private business are dropping them as they are seen as a waste of time, the fact still remains that the evaluation of teachers is the role of the Inspectorate. That role has not been devolved to principal teachers and TUI would strongly object to any move to do so. Principal teachers have not been trained to assess the multiple competencies required of subject specialist teachers. TUI sees no situation in which it would agree to such a devolution of power from the Inspectorate, and would find any such move absolutely unacceptable.”*

A follow-up letter from TUI also dealt with this issue when it suggested that

*“The second matter related to our grave fears regarding wording in the documents which appears to suggest a form of performance appraisal/PMDS.  As outlined at the meeting, this is absolutely unacceptable to TUI for the many reasons outlined at the meeting.  TUI welcomes the assurance by DES at the meeting that this is not intended to be a performance appraisal system or similar.  However, performance appraisal is clearly a red line issue for TUI.  Many principal teachers, despite the very heavy workload they endure, already talk informally to their staff on a daily basis.  Many also meet formally with subject departments from time to time.  The use of the words “meeting” and “annually” in the proposed DES documents raises significant concerns for TUI.  TUI asks how formal or structured does the DES see a “meeting” to be?*

*TUI welcomes the clarification that this process is in no way intended to be performance appraisal but TUI must restate its absolute opposition to any such system being introduced.  The only way for that concern to be satisfactorily addressed by the DES is for any reference to principal teachers meeting “teachers annually to discuss and evaluate their work”, or similar references, to be deleted from the document forthwith.”*

Conclusion

In conclusion, TUI would like to acknowledge the significant improvements in this draft from earlier drafts and the genuine effort of the Inspectorate to take account of submissions made by stakeholders. There are still some improvements to be made but the overall emphasis of the document on teaching and learning and on the context of the school is most welcome.

Ends

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