



Delivery for Students with Special Educational Needs

A better and more equitable way

**A proposed new model for allocating teaching resources for students
with special educational needs**

INTO RESPONSE

24 September 2014

Introduction

Since the 1990s the inclusion of children with special educational needs has become the norm in primary schools. Primary teachers have demonstrated their commitment to pupils with SEN and have endeavoured to provide a high quality education to all their pupils, often in large classes with inadequate resources. Any proposals aimed at enhancing the education of children with SEN are worthy of consideration. There may be weaknesses in the current system, but it's important that the current system is not replaced with a system with different weaknesses.

Teachers have a strong tradition of cooperating with educational developments and practices that seek to enhance the learning of their pupils. Primary teachers have been proactive and instrumental in the transformation of schools and have openly embraced a policy of inclusion. References in the report to 'sanctions' (p. 39), the need to 'validate' or 'verify' (p. 45; p. 56) reflect a lack of trust in teachers. This development is regrettable and is counter to current practice. It is in the interest of all parties that relationships between schools and the State and/or its agencies are not damaged by a climate of mistrust.

The INTO acknowledges the efforts of the working group established by the Minister for Education and Skills to develop proposals regarding a new model of allocating additional teaching resources to schools to assist pupils with special educational needs. In order to support schools to be inclusive schools additional teaching resources are essential. The EPSEN Act also needs to be implemented. Any new model must not result in a reduction in the current provision available.

In this submission the INTO offers its initial views on the proposals for a new model to allocate additional teaching resources to schools to support the education of children with SEN. The INTO will comment further when the proposed model has been constructed and tested.

Principles

The INTO acknowledges that the principles underpinning the proposals for a new model reflect the points made in its submission. In summary these are as follows:

Core additional teaching support for all schools

Additional teaching support based on schools' needs

Allocation of additional teaching resources for fixed periods

A mechanism to respond to schools whose profiles change significantly

However, there are many issues of concern to teachers arising from the proposals and how they might operate that warrant further consideration.

Baseline Allocation

The allocation of 15% of additional teaching posts to schools as a baseline is not sufficient. The baseline allocation outlined in the report is too low. Schools will not be in a position to support inclusion, to minimise the emergence of learning difficulties and facilitate early intervention with such a low baseline as recommended in the proposals (p. 31). Early intervention is crucial in Junior Infants, Senior Infants and in First class in particular. Schools have used their GAM allocation to support early intervention. If the Department is serious about ensuring early

intervention class sizes in infant classes, in particular, must be reduced significantly. About 25% of pupils in Irish primary schools are in classes of 30 pupils or more. Junior schools would be disadvantaged with a low baseline support, because they would not attract additional weighting based on the results of standardised tests, until pupils are in second class. Interventions and approaches such as guided reading groups, Reading recovery, maths recovery, maths for fun/ready set go maths, Aistear would not be possible with such a low baseline support.

The stated purpose of a baseline allocation to schools is to “enable schools to have whole-school systems and supports in place in a timely manner for students with special educational needs” (p. 47), and to “provide enrichment programmes in literacy and numeracy to students, especially students in junior and senior infants in primary schools ... with a view to preventing and minimising the emergence of low achievement and learning difficulties” (p. 47), and “put in place early intervention programmes for students, especially students in infants and first class in primary schools ...” (p. 47). The allocation of 0.5 teacher maximum as a baseline will not enable schools to fulfil these aspirations. With this level of resource schools will not be in a position to demonstrate that they welcome students with SEN through their admission policies and other school-related documentation. It is not clear why there is a cap.

While acknowledging that class teachers have primary responsibility for the progress of the pupils in their class and for differentiating lesson plans to enable all children to access the curriculum, class teachers rely on the support of learning support and resource teachers to enable pupils with SEN to access the curriculum.

The low baseline allocation is of particular concern for schools that do not have many pupils with low STen scores in standardised tests and who have very few children from socio-economically disadvantaged backgrounds. Both large and small schools are concerned about the implications the proposed model will make to their additional teaching allocations.

The INTO recommends that the baseline allocation be significantly increased. The INTO is willing to enter discussions with the DES regarding an appropriate baseline for all schools. **The INTO also recommends** a reduction in class size, particularly in the infant classes.

School Educational Profile

The principle of allocating additional teaching resources to schools based on need is laudable. Devising a mechanism or formula to allocate additional teaching resources based on need is complex.

Complex Educational Needs

The definition of complex special educational needs as outlined in the proposals is too restrictive. The use of the term ‘very significant difficulties’ is likely to exclude children with difficulties who require additional teaching support – children who currently receive additional support through resource hours. Some children with special educational needs have very complex needs, as outlined in the proposals (p. 32), but there are many children with SEN, who require additional support but whose needs may not meet the definition outlined in the proposals. The definition of special educational needs in SERC (1993) includes four broad areas: General learning difficulties,

Emotional and Behavioural Disturbance, Language and Communication Difficulties and Disorders, and Physical and Sensory Difficulties.

The INTO supports the proposal that children should not need to be labelled in order to receive additional teaching support, though a diagnosis can often assist intervention. The descriptors to be developed for identifying children with SEN must include all special educational needs. The list of needs mentioned on page 33 is too restrictive and excludes children with less complex SEN, but who need additional support. It is critically important that children with disabilities or learning difficulties such as dyspraxia and dyslexia should also feature in schools' educational profiles. The latter difficulties pose significant challenges in the context of the whole class learning environment. Schools cannot be adequately inclusive schools unless all children with SEN are included in determining schools' additional teaching resources.

The INTO recommends a broader and more inclusive interpretation of 'complex special educational needs'. **The INTO also recommends** that teachers be consulted regarding the development of descriptors to identify children with SEN. Many children are identified after they start school.

National and international assessments (NA, 2009; PIRLS, 2012) indicate that one of the challenges in Irish schools is meeting the needs of higher achieving pupils who are not reaching their potential. The needs of these pupils need to be factored into the weighting system.

Percentages of students performing below a certain threshold on standardised tests

When schools were initially requested to send the results of standardised tests in reading and mathematics of children in 2nd, 4th and 6th to the DES it was stated at the time that the purpose of this exercise was to monitor trends. The use of the results of standardised tests to determine the allocation of teaching resources to schools signifies a major change in policy of the Department of Education and Skills. Teachers have major reservations about the use of standardised test results to allocate resources.

While the results of standardised tests may have been used at school level to determine what children would benefit from learning support, the use of standardised test results at system level changes the dynamic of testing. Schools now feel penalised for working hard at improving standardised test results. Teachers are committed to enhancing the educational achievement of their pupils. Learning support and resource teachers support the work of class teachers in seeking to improve test scores. Any loss of support teachers will make it difficult to maintain current progress. If resources are removed from schools based on the results of standardised test results, early intervention and support will not be available to the next cohort of pupils, potentially leading to deterioration in standardised test results.

Allocating a weighting to pupils achieving STen scores of 1, 2 or 3 may be insufficient. Consideration should be given to including the percentage of pupils scoring at STen score 4 if weighting is to be applied to results of standardised tests.

Limiting the use of standardised test results in schools teaching through Irish to one language does not reflect the challenge in these schools in enhancing pupil achievement in literacy in two languages. High levels of literacy are expected in both Irish and English in these schools. It is obligatory for Irish-medium schools to send their standardised test results in both languages to

the DES. Therefore, standardised test results in both languages should be taken into account if it is decided to include the results of standardised tests in schools' educational profile.

The INTO objects to, and will resist, the proposal that the results of standardised tests should be forwarded directly to the NCSE. This information is sent to the DES on a confidential basis.

The INTO also objects to, and will resist, any requirement on small schools to submit the results of standardised tests in 3rd and 5th class. Schools are not obliged to administer tests in these classes.

The INTO's position on the use of standardised test results rests on how the results will be weighted. The limitations of standardised tests are clearly outlined in the report. It appears that far too much importance is being placed on standardised test results. A final model must minimise the use of these results in order to ensure that they do not become 'high stakes tests' that have undue influence on the allocation of teaching resources.

Schools retain the results of standardised tests in schools for a period. These results are always available to inspectors to review. It is the INTO's view that it is sufficient to make results of standardised tests available to inspectors and that it is not necessary to make results available to other parties.

It is sufficient also for schools to note the names of children exempted from standardised tests and to note the reason for the exemption. Alternative assessment information is available for all children as a matter of good practice and should not need to be recorded separately for children exempted from standardised tests.

It is unfair to teachers to insinuate that they do not adhere to the test manuals when administering standardised tests. It is also unfair to teachers to refer to sanctions to reduce the likelihood of inaccurate reporting and reflects a serious lack of trust in schools which is unwarranted. There are risks associated with high-stakes testing, and the use of test results should have a minimal impact on the allocation of personnel.

Any professional development for teachers on assessment must reflect a holistic approach to assessment and not focus exclusively on standardised tests. This mistake was made by the DES when standardised tests were first made obligatory for schools to administer. The administration of standardised tests must be seen as part of schools' assessment policies.

The INTO acknowledges that practices differ in relation to test exemptions and welcomes the provision of guidance on this issue to schools from the DES.

Support from NEPS should not be confined to informing intervention and deployment of resources based on the results of standardised tests. NEPS should be available to support intervention based on need. Not all children with SEN will have low scores on standardised tests.

Standardised tests take place in 6th class in May. The results cannot be transferred to post-primary schools any earlier.

The NCCA (2005) recommended the expansion of a Programme of National Monitoring on a sampling basis and not the gathering of standardised assessment data from all schools. (p. 39)

The purpose of standardised tests is to allow schools to compare their performance relative to national norms not to provide the basis for competition between schools. The INTO would not support, and will resist, a move towards establishing one standardised test. This move could potentially be seen as a return of the primary certificate.

The significance of standardised test scores should exercise minimal influence in the allocation of teaching staff.

The INTO recommends that standardised tests in both Irish and English reading should be weighted in schools teaching through the medium of Irish. **The INTO also recommends** that weighting should be allocated to pupils achieving a STen score of 4 in addition to STen scores of 1, 2 and 3.

Social Context of school including gender and disadvantage

The INTO supports the inclusion of schools' social context in their educational profiles. The INTO has long advocated for supports for schools designated as disadvantaged. While schools with a very high concentration of pupils from disadvantaged backgrounds face particular challenges, it should be recognised that there are disadvantaged children attending many schools that are not designated disadvantaged. The inclusion of social context in schools' educational profiles addresses this issue. The inclusion of Traveller children and children for whom English or Irish is not a home language in schools' educational profile is also welcome.

However, the data gathering process is problematic. Principals and teachers do not have the type information regarding welfare and employment requested in the questionnaire sent to primary schools in early September. While they were invited to provide estimates, many principals are uncomfortable estimating such information, particularly when responses are likely to have a significant impact on the allocation of resources. If the data provided by schools can be verified with information in the Census 2011, perhaps the Census data should have been used in the first place.

While this data gathering process is not intended to be a review of DEIS, it is timely to consider a review of DEIS, as profiles of schools have changed since DEIS was first introduced.

Students with emotional and behavioural difficulties are not confined to areas of social disadvantage though they may be more prevalent in these areas.

The proposals for a new model have not referred to the needs of high-achieving gifted children or children with mental health difficulties. Clarification is also required in relation to exemptions from Irish.

Weighting

The principle of differentiated weighting is laudable. The INTO will comment further once weightings have been developed and the new model has been constructed. The new model will have to be tested in a sufficiently representative sample of schools and over a sufficient time period to ensure that it is transparent and fair but also operable at both system and school level.

SEN Support Teachers

The INTO welcomes the introduction of the concept of support teachers to replace both learning support and resource teachers. The separate allocation processes for learning support and resource teachers caused many difficulties for schools, particularly in relation to the appointment and deployment of personnel. Clarification is required regarding the issue of probation. Currently, teachers must be probated in order to be deployed as learning support teachers. Teachers appointed to resource teaching positions could complete restricted probation as resource teachers. The situation of teachers with restricted recognition in resource teaching posts also needs to be clarified.

Transitional Arrangements

Transitional arrangements will be essential to move from the current model to a new model, particularly where there may be significant changes in schools' current allocations. It is optimistic to expect a new model to be in place for September 2015.

Appeals

The inclusion of an independent appeals system is vital. There should be a process in place where schools can appeal their additional teaching resource allocations. Appeals at school level are more problematic. They can be time consuming and frustrating for both schools and parents, particularly if the root of the problem is that schools do not have sufficient resources. Schools will have to prioritize the allocation of resources to pupils based on pupils' needs relative to each other. Handling appeals at school level will increase the workload of principal teachers, in particular, and will require additional administrative support in schools. It also has the potential to cause disharmony between parents and schools, who are more used to working together to seek resources for children with SEN.

Reviews of Allocations

The INTO supports the proposal that reviews would take place initially every two years, and perhaps every three years when a new model has been fully developed and embedded. Such reviews should provide for the release of teachers from teaching duties so that the supporting work can be done professionally and in good time. Allocations to developing schools should be reviewed every year as proposed.

Information Transfer

The INTO supports the development of forms and protocols around the transfer of information from pre-schools to primary schools, including information in relation to SEN. The development of these forms and protocols should be done in consultation with teachers and pre-school educators. The methods used should also have the approval of the Data Protection authorities so that schools are not open to challenges under the Legislation

Professional Development

Given that the class teacher has ultimate responsibility for the education of all children in the class, including children with SEN, all teachers should have access to professional development in relation to teaching children with SEN. CPD should be funded by the State and available to teachers during school time. Class teachers need additional support in relation to identifying learning difficulties. Any teacher assigned as support teacher should have access immediately to the Diploma courses in SEN organised by the Colleges on behalf of TES (circulars 0001/2014, 0002/2014, 0003/2014). Diploma courses in SEN should be available on a part-time basis to facilitate teachers in support teaching positions who may be job-sharing.

Therapeutic Services

There is an assumption in the proposals that health-related therapeutic services such as speech & language therapy, occupational therapy, physiotherapy and CAMHS are available. In schools' experiences these services are not available. Where they are available there are often long waiting lists. Teachers often find themselves being asked by therapists to follow through on therapy exercises, when they are not qualified to do so and not trained to do so. This practice is completely unacceptable. Supporting inclusion requires a fully integrated system involving health and education to be available to children as needed regardless of setting.

The INTO recommends the provision by qualified therapists of health-related therapeutic services for all children who require same in schools. Each school must have ease of access to the range of health services necessary for the development of children

Allocation of support at school level

A model that places the responsibility at school level to determine the utilisation of resources can only work when sufficient resources are available. The responsibility will most likely fall on principal teachers. In the context of a decimation of posts of responsibility, leaving many schools with no in-school leadership teams, the additional responsibility will become intolerable. In-school leadership and management teams need to be reinstated if a system of devolved responsibility is to work. All schools should be in a position to designate a member of the leadership team to coordinate special education. The Sen co-ordinator should also have release time.

The INTO recommends the reinstatement of posts of responsibility to schools to enable schools to appoint SEN coordinators. A model for the provision of a minimum release time model should be developed, piloted and reviewed in the first two years of the operation of the scheme.

NEPS

Support from NEPS is not always available. NEPS personnel are not replaced when on leave resulting in schools having no service from a psychologist. NEPS has yet to reach its capacity of employment as planned when it was first established. The school population has since increased. The precise role of NEPS in schools requires further development.

Inclusion Support Service

The precise role and structure of the proposed Inclusion Support Service needs to be developed further. The SESS currently provides a comprehensive professional development support to teachers in the area of special education. However, its capacity is very limited. The Visiting Teachers also provide a valuable support to teachers and parents, which in its current form gives a service at the chalkface that is appreciated and valued by teachers across the country. There is no point in developing a new structure to provide cohesion across the system unless its role is clear and it is sufficiently resourced to fulfil its remit. Recommendation 21 regarding the retention of teacher posts to enable the ISS to support schools is unclear. If teaching posts are required to support the work of ISS, additional posts should be provided. Clarification is also required on how an outreach teaching support will be provided to meet the needs of schools where unanticipated circumstances arise.

Inclusive teaching approaches and methodologies and effective assessment and planning strategies are essential at school level, however, the importance of having additional personnel to support the inclusion of children with SEN should not underestimated.

Outcomes for students with SEN

The INTO acknowledges that outcomes for children with SEN include academic achievement-related outcomes, attendance-related outcomes, happiness-related outcomes and independence-related outcomes. Such outcomes apply to all children. IEPs reflect the goals and targets that apply to individual children. The necessity to record outcomes should not increase the administrative workload of teachers or principals. It should also be borne in mind that not all outcomes are readily measurable.

Schools should not be obliged to provide annual reports to the NCSE on progress made by students with SEN. School-evaluation processes are already in place. The school inspectorate already has responsibility for evaluating the use of resources and the progress of students. Additional reporting to the NCSE will create additional workload for teachers and principals and is not necessary. There is no need for an additional layer at system level in relation to reporting on children's progress.

Administrative Burden

The INTO notes that the proposals aim to reduce the administrative burden on schools associated with the current model of having to apply for resource hours on an annual basis. However, proposals in relation to sending annual reports to the NCSE increase the administrative workload as does the requirement to retain paperwork for accountability purposes. The current situation is entirely unsatisfactory for principals and substituting it with another unresourced administrative burden will not be tolerated by INTO.

Guidelines

The INTO acknowledges the need to update current learning support / resource teaching guidelines to reflect current research on special education. Teachers, along with the INTO, should be involved in the process of updating the guidelines.

Conclusion

The proposals promise a better, fairer and more equitable model. They offer a promise that pupils with SEN “will have immediate and timely access to additional educational resources they require”, but this commitment is far from certain. With such a low baseline, schools will not be in a position to guarantee access to prevention and early intervention. Unless the baseline allocation is increased expectations will be created that cannot be met. There are many positive aspects to the proposals. The need to label children in order to receive support will no longer be required, additional teaching resources will be based on need, and schools will have the freedom to deploy their resources in a manner that meets the needs of their pupils. In summary:

The INTO will give further consideration to the proposals when a weighting system has been constructed,

Any new model will need to be tested and made subject to any necessary modifications before implementation nationally,

The INTO is willing to engage with the DES and the NCSE to discuss an appropriate baseline level,

The 15% reduction in current resource teaching hours should be returned to the system

Additional teaching posts should be made available to meet the needs of an increased school population.

The new model proposals present a golden opportunity for the development of a quality support system for pupils with special needs. The provision of the resources to the model will not only serve the needs of pupils with special educational needs but will enhance the learning experience of all pupils who will gain from the fact that special needs are being met. Everyone’s needs are, therefore, met to a higher standard. INTO will be monitoring this development and will demand that all pupils are facilitated to *bloom* in their educational development.