# INTO Response to Consultation on DES Strategy Statement

# December 2018



# Introduction

The Irish National Teachers' Organisation (INTO) represents 37,000 teachers in primary and special schools in the Republic of Ireland. We welcome the opportunity to respond to the Department of Education and Skills consultation on a Strategy Statement for the next three years.

It is worth noting that the Irish primary education system is well regarded internationally and at home. Public satisfaction with education was the second highest in OECD countries (Government at a Glance 2017, OECD) and teachers are among the top three most trusted professionals in Ireland (Engineers Ireland survey, 2018). Irish primary school age children performed better than average in international achievement tests. In the 2017 PIRLS report, Ireland's primary school children were "best in Europe and OECD countries for reading skills" (DES Press Release, December 2017) and in the 2016 TIMMS report, Irish fourth class students ranked ninth out of 49 countries in maths and 19<sup>th</sup> of 47 countries in science.

Key to this performance is the quality of teachers. In 2012, the review panel in the Report of the International Review Panel on the Structure of Initial Teacher Education Provision in Ireland (Sahlberg Report) concluded that the academic standard of entrants to teacher education in Ireland "is amongst the highest, if not the highest in the world".

Based on the foregoing, it is clear that primary schools and teachers are performing well. We acknowledge that every education system must change and adapt, and that good performance cannot be taken for granted. Ireland has come through a severe economic recession but our economy has now been restored to good health and a budget surplus is predicted for this year. Funding for primary education remains low by international standards. The most recent OECD Education at a Glance report (September 2017) states that the average State spend in Ireland on a primary pupil is the equivalent of €6,464 per year, compared with €8,100-€8,300 on each second-level student and €8,597 at third-level. The corresponding figures for the OECD countries are €7,233, €8,200-€8,500, and €10,619. Overall spending on primary education must increase. In this context, it is essential that priority be given to restoring key elements of provision that were curtailed in times of economic crisis.

- The projected demographic profile in primary schools affords some opportunities to reduce class size to EU average levels a key INTO priority, and provide for supply panels.
- Capitation funding for primary schools must be increased to pre-recession levels.
- Supports for school leadership, including leadership and management posts must be increased.
- We need further investment in supporting pupils at risk of social exclusion and children with special educational needs.
- The pay and conditions of all teachers, including post 2011 entrants to the profession, must be equalized and increased as a means of ensuring the recruitment and retention of a supply of highly qualified and motivated teachers.

Change must be moderated and paced in such a way that it does not become a barrier to improvement and development, or a deterrent to effective teaching and learning. Recent years have seen a plethora of initiatives and programmes introduced in schools, often without adequate resourcing or training. A demand for demonstration of compliance with legislative initiatives has increased bureaucracy and administration in schools. Calls from many quarters for schools to respond to societal changes and become the remedy to matters such as obesity, excessive mobile phone use, and environmental damage have left teachers feeling that they are being asked to take on additional workload. All of this is taking place alongside curricular and other changes to teaching and learning in schools.

A sense of frustration and anger at additional workload was evident in the first resolution of INTO Congress 2018. The resolution expressed deep concern at "the ever expanding list of initiatives emanating from the DES and others" and stated "that the expectation that teachers undertake additional workload and resulting pressure is untenable", and demanded that "a timetable for curricular change and deceleration of curricular change be agreed".

There is an opportunity in this Strategy Statement to commit the State to repairing the damage done to our education system in the recession, addressing workload, dealing with the issue of fatigue with innovation and change; and allowing schools the opportunity to consolidate reforms already introduced and implemented.

The recently established Primary Forum on workload also provides a clear method of meaningful consultation around the introduction and sequencing of change. The Minister has indicated his awareness of this latter issue and his desire to do something about it. We look forward to seeing this aspiration reflected in the Strategy Statement.

# Goal 1: Improve the learning experience and the success of learners

# Curriculum

Curriculum change needs to be slowed down to enable each change to be embedded before a new change is introduced. Specifically, the introduction of the primary Maths Curriculum should be deferred to allow teachers to focus on the implementation of the language curriculum and to allow consultation on the overview of the primary curriculum to take place first. All curriculum change needs to be supported by comprehensive professional development, and substitute cover / or school closures must be provided to enable teachers to attend any system driven professional development.

# Literacy and Numeracy

The focus in the Literacy and Numeracy strategy should be on improving learning in literacy and numeracy rather than on targets of achievement in tests that reflect only narrow aspects of learning. All schools should have the option of availing of professional development in programmes such as First Steps, Ready, Steady, Go Math etc; currently only available to DEIS schools, where they feel it would be of benefit to their pupils.

# STEM

Professional development for teachers should be available on an ongoing basis, to enhance the teaching of science and maths which takes place in primary schools. Funding should be available to all schools to enhance the teaching of STEM.

# Digital learning/ICT

Many schools have developed good practice and have accessed technology, often through fundraising. To enable schools to progress, ICT resources, technical support and broadband should be available to all schools. Professional development in ICT should be available on an ongoing basis. The provision of broadband to every primary school must remain a key objective in the digital strategy.

# Well-being

The focus on well-being in the previous Action Plan is welcome. Primary schools are very aware of their responsibilities in this area, and a more formal approach to ensuring that children have the essential skills and resilience they need has been recognised. However, there should be no obligation on schools to use SSE to develop well-being in their schools. Well-received programmes such as Incredible Years, Pax, and Friends for Life should be available to all schools. Support should be available from PDST to support schools to develop well-being policies

# Transitions

Time should be available to teachers to engage with pre-schools, post-primary schools to enable successful transitions for pupils.

# Goal 2: Improve the progress of learners at risk of educational disadvantage or learners with special educational needs

# Disadvantage

The improvements which have occurred in recent years in class size have not been reflected in the DEIS staffing schedules. While the additional number of pupils to appoint a further teacher in mainstream schools has been reduced (in larger schools) from 28 to 26, the DEIS ratios remain at their previous levels so that, for example, in a DEIS Band One school, 22 remains the number of children required to employ a further teacher in a vertical school. Not changing the ratios in the DEIS schools has reduced the sharpness of the focus on tackling educational disadvantage and these ratios could be improved immediately with very little implication for overall resourcing. In addition to reducing the DEIS ratio which currently applies to DEIS Band One schools only, the DEIS ratio should apply to DEIS Band Two schools also. The most disadvantaged schools should have their ratios reduced further to ensure a ratio 15:1 in junior classes and a ratio of 18:1 in senior classes applies. This ratio applies in practice in some schools due to staffing allocations under previous schemes to tackle disadvantage.

# Special Education

A re-examination of teacher allocations to support pupils with special education needs is due to take place this school year. It is essential in carrying out such a review that disruption be minimised. While there are schools which require additional resources as they have enrolled additional children with special educational needs, any adjustments to schools' allocations based on their updated educational profiles must be handled with sensitivity and flexibility, not by any radical reshaping of school clusters which will result in unnecessary disruption and additional workload.

The issue of managing challenging behaviour, sometimes in association with managing special education needs is one which is of great concern for INTO members. The lack of guidance or training in this area leaves teachers and other pupils vulnerable to assaults and injuries. The DES has long promised guidelines in this area and they must be delivered as soon as possible.

# Goal 3: Help those delivering education services to continuously improve

# Teacher Supply / Staffing

The Chief Inspector's Report (2013-2016) published in 2018 states "The quality of future education provision in Ireland is dependent on a supply of highly qualified, motivated teachers. That supply cannot be taken for granted". Good pay and conditions, including pay equality for post 2011 entrants to teaching are vital to ensuring the recruitment and retention of top quality teachers. In the Sahlberg Report (2012), the review panel stated that it was "surprised and concerned that the issue of teacher supply and demand has not been addressed in Ireland as it has been elsewhere". We note the work which has already

been carried out by Teacher Supply Steering Group. INTO continues to request representation on the Steering Group, and in particular on the Working Group on policies and procedures.

A key priority for INTO is the establishment of Supply Panels to manage substitution in primary schools on a sustainable basis. The predicted demographic changes in the primary pupil population over the coming years offer a real opportunity to address the establishment of supply panels, in addition to reducing class size to European norms of 20 to one, ensuring adequate resourcing of special education, cover for teachers attending CPD and giving a minimum one day a week of leadership and management (release) time for teaching principals.

The challenge of demographic change is an enormous one at primary level over the next number of years. According to the DES's own figures (July 2018) 2018 is the year of peak enrolment in primary schools with significant falls each year thereafter amounting to a reduction in enrolments of over 30,000 over the three years to 2022. The effects of this will not be even across the country and in some cases the existence of schools will be threatened by significant falls in local enrolment. A plan, in co-operation with the education partners, needs to be devised to address the implications of this.

More optimistically, the reduction in enrolments in primary schools provides an opportunity to reduce class sizes so that classes in Ireland for the first time reach European averages. The conclusion of the Education Research Centre major study in 2017 (Addressing Educational Disadvantage) is worth highlighting: "The research evidence indicates that children perform better in smaller classes, especially in the earlier grades". Addressing the resource issues, including the need to resource smaller classes at a time of falling enrolments, is of central importance in devising a strategy for our education system.

# Inspection including Child Protection and Safeguarding Inspections (CPSI)

Primary schools are now subject to six different models of inspection – with another (CPSI) planned to come on stream. The Chief Inspector's Report (2018) highlighted strengths in primary education, including curricular reform, improvement in literacy and numeracy, and overall high standard of teaching in primary schools. Teachers want a consistent approach to inspections, an emphasis on the quality of teaching and learning, not paperwork and bureaucracy, with affirming feedback on good practice. In this regard, the INTO recommends that the DES revert to the term 'School Development Plan' instead of Action Plan for School Improvement, as it is more in keeping with the educational tradition of planning and review.

The proposed introduction of CPSI needs to be moderated and the clear views of stakeholders, as expressed at consultation stage need to be taken on board. The workload involved in complying with the 2017 child protection procedures has become a major and legitimate concern for Principals/DLPs/staffs and there is an immediate requirement to review this workload in order to maintain effective protection for pupils whilst not unnecessarily over-burdening the system. From our dealings with Principals throughout 2018,

INTO is satisfied that to date this balance has <u>not</u> been achieved and of even more concern, INTO is most concerned that the additional paperwork and workload generated by these new guidelines, is not advancing our shared objective of schools implementing robust child protection procedures. Clarity on what the Inspectorate will be seeking as part of the CPSI is welcome. However, the sub-checks are too many and too onerous and must be reduced.

Accordingly, INTO recommends:

- The continuation of the pilot phase across a further range of schools;
- Provision of training for DLPs and Deputy DLPs particularly those involved in an extended pilot, and the provision of whole staff training;
- That the completion of training precede the full commencement of these inspections;
- A reduction in unnecessary paperwork and records;
- Further clarity on the extent of policies required;
- Specific additional support and facilitation for teaching Principals;
- Focus on encouraging compliance as opposed to recording non-compliance this should be the case for <u>all</u> procedural matters as there is no benefit or encouragement to a school to record a procedural non-compliance matter, especially when this is rectified within the CPSI time-frame. The focus must remain on the main reporting obligations.

# School Leadership

Leadership and Management (Release) Time for Teaching Principals

1765 (54%) of primary schools are led by principals who also have full-time teaching duties. However, the DES requirements in terms of administration and compliance are exactly the same for all principals. The emphasis on compliance in areas such as GDPR, Child Protection, Health and Safety and employment law has placed a huge administrative burden on principals as the day to day managers of their schools. The Ancillary Services Grant in a 100 pupil school is €16,900, which provides only part-time secretarial and caretaking services to such schools. All school secretarial / administrative staff should be paid directly by the DES, in a similar manner to teachers and SNAs.

The case for one day per week leadership and management time for teaching principals has been well made by INTO since INTO Congress 1995. Teaching principals need this time to meet the non-teaching demands of their role and to ensure that the children they teach receive the quality of teaching they are entitled to. When changes are being planned for schools, implementation must take account of the needs of the teaching principal. The nonpayment of the outstanding pay award, which would have seen allowances rise for this group of principals, remains a source of frustration and anger. This must be paid.

# Restoration of posts

The 2017/18 school year saw the implementation of major changes to the manner in which appointments are made to leadership and management posts, situated in the framework for leadership set out in "Looking at Our Schools". Schools and teachers have changed their practice, and this approach needs to be bedded in to the system in the coming three year

period. The appointment procedures for principal and deputy principal (external appointment) also need to be revised and brought into closer alignment with the leadership framework, and to reflect best practice in recruitment for these critical posts. There must be continued support and resourcing of training for those involved in Selection Boards for these posts.

The failure to continue the restoration of posts, as committed to by the DES when these changes were agreed, is deeply concerning. We note that the Chief Inspector remarked in his report (February 2018) that: "The impact of the moratorium on posts of responsibility continues to be felt by schools". This continues to be the case and is an inhibiting factor at a time when the demands on schools are increasing and the regulatory context in which they work is ever more demanding. The commitment to continued restoration of leadership posts must be adhered to.

# Support for Professional Development

The DES should support teacher quality through a specific focus on teachers as learners throughout their professional careers. During the recession, the rewards through the allowance system for teachers undertaking further studies were largely removed without any development of a support system similar to those available in other areas of the public service where employees undertake studies.

In this regard, the Teacher Fee Refund scheme is entirely inadequate and has provided significantly diminished average fee refunds to teachers over recent years. Between the years 2011 and 2016 applications for fee refunds grew by 664 (or 118%) while the average refund fell by €685 (to less than €500) or a fall of 61% (answer to Parliamentary Question 174 14 December 2017). This scheme needs urgent review, to include greater resourcing and provisions similar to those in best analogous public service scheme.

The model of using seconded teachers to provide professional development in respect of system needs has been a successful one. Seconded teachers contribute enormously through PDST, CSL and the Education Centre network. However, the sustainability of these services has been undermined by an overly restrictive approach by the DES to the management of secondments, particularly in sustaining management and leadership structures in these organisations. A review of the role of seconded teachers in the area of professional development is required.

A DES approach which is serious about helping those delivering education services to continuously improve must address the conspicuous lack of support for teachers as learners.

# Goal 4: Build stronger bridges between education and the wider community

# Parent and Student Charter/ Section 28 Procedures

INTO and the Teaching Council have called on the Minister to prescribe procedures so that there is a consistent approach to the handling of complaints at school level, but also to ensure that procedures at school level would have a statutory underpinning. This is

extremely important in the context of the Fitness to Teach process, to ensure that all efforts are made to deal with complaints at local level, so that they do not escalate.

# Education (Admission to Schools) Act 2018

We note the passing of the Schools Admissions Act and the precipitous commencement of certain sections of the Act, without adequate preparation or guidance to schools. Before further sections are commenced, there is urgent need for Guidelines on admissions policies for schools, to ensure that appropriate selection criteria and processes are utilised.

The section in relation to the designation of schools to compel them to make additional provision for children with special educational needs has caused some concern in schools. There are already 1,049 special classes or units in primary schools. In compelling a school to open a special class or admit a pupil with special educational needs, there must always be a consideration of the needs of other pupils and the availability of resources in making such a decision. When special classes are established, there must be ongoing support and training for the teachers involved. The additional administrative burden on the principal of a school with special classes must be recognised and additional support provided.

# Patronage and Management of Primary schools

INTO supported the Forum on Pluralism and Patronage and the recommendations which emerged from it. We are disappointed at the slow progress in achieving increased diversity in the patronage of primary schools.

We note that the new Governance Manual for Primary Schools is due during the three year period, and that new Boards for primary schools are due to be established in 2019. Consideration needs to be given to how Boards, made up of volunteers, can best be supported so that they can carry out the extensive legal and compliance responsibilities required of them. The current absence of proper support for Boards means that additional workload falls on the principal teacher across a wide range of areas. Principals also report that it is becoming increasingly difficult to find people who are willing to serve on Boards.

# Goal 5: Improve national planning and support services

# Data protection

The implementation of the General Data Protection Regulation was a cause of major upheaval in schools during 2017/2018. The ongoing demands on schools for proper management of data and privacy issues are not sustainable without proper training and guidance. The DES has not taken responsibility for giving any guidance to schools, instead placing this burden on Boards of Management and Management bodies. We believe that this stance is neither credible nor sustainable. In his role in planning and co-ordinating the provision of education in recognised schools, the Minster cannot absolve himself of responsibility in this area. The DES must develop proper guidance for schools in this area, and provide training and resources for school personnel to carry out their statutory responsibilities.

Payroll

We acknowledge that the Minister has responsibility for the largest payroll in the State and that the management of it is a particular challenge. We are aware that a payroll modernisation project has been initiated in the DES, to include the OLCS. This modernisation is urgently required and should be prioritised in the next three years. Another issue which must be addressed as a matter of urgency is the provision (as required by the 2012 Act) of pension benefit statements to members of the Single Public Service Pension Scheme.

# Seirbhísí trí mheán na Gaeilge

Aithníonn muid go bhfuil dul chun cinn déanta ag an Roinn maidir le ciorcaláin srl a chur ar fáil trí mheán na Gaeilge. Go minic bíonn moill ann agus acmhainní agus foilseacháin eile ag dul amach ag scoileana. Éilíonn CMÉ go mbeadh gach ábhar scríofa atá ag teacht amach chuig scoileanna ón Roinn trí Bhéarla ag teacht amach ag an ám céanna trí Ghaeilge.

#### Buildings

We note and welcome the commitments in Project Ireland 2040 to nationwide school building programme to respond to demographic changes, as well as the Prefab Replacement Programme, on tandem with Summer Works Schemes and Minor Works Schemes to support the ongoing school maintenance and upgrade programmes. It is essential that support is available at local level for principals and Boards of Management in implementing building projects. Schools needs support in areas such as project management and evaluation of tenders. This could be facilitated through links with ETBs at local level, or the appointment of Clerks of Works for larger projects.

The recent issues in a number of primary school buildings has caused great difficulty for our members in those schools. The confidence of teachers and the wider public in the ability of the DES to respond to demand for schools in rapidly growing areas has been undermined. We acknowledge that the DES Building Section worked efficiently with schools on this issue. This issue demonstrated the need for good communication with schools on building projects, including on the progress of applications.