

# Re-opening of Primary and Secondary Schools

Submission to the Special  
Committee on Covid-19 Response  
on behalf of the INTO

**19 June 2020**



**Irish National Teachers' Organisation**  
*Cumann Múinteoirí Éireann*

Vere Foster House  
35 Parnell Square  
Dublin 1  
D01 ET35

Tel: 01 804 7700  
Fax: 01 8722462  
Email: [info@into.ie](mailto:info@into.ie)  
Web: [www.into.ie](http://www.into.ie)  
General Secretary: John Boyle

Áras Vere Foster  
35 Cearnóg Parnell  
Baile Átha Cliath 1  
D01 ET35

Guthán: 01 804 7700  
Fax: 01 872 2462  
Ríomhphost: [info@into.ie](mailto:info@into.ie)  
Greasán: [www.into.ie](http://www.into.ie)  
Runaí Ginearálta: Sean O Baoill



## 1. Introduction

The Irish National Teachers' Organisation (INTO) is the largest teachers' organisation in Ireland representing the trade union and professional interests of over 48,000 members in the Republic of Ireland and Northern Ireland. The INTO welcomes the invitation by the Special Committee on COVID-19 Response to outline the issues and challenges that face Irish primary schools and special schools as they work towards ensuring a safe return to education for the whole school community, following the global pandemic. This submission relates to primary schools and special schools in the Republic of Ireland.

COVID-19 has had an unprecedented and devastating effect on Irish society, one that the country may take years to recover from. The repercussions have the most impact on the vulnerable, and education is a key sector that can play a role in addressing the negative consequences.

In the Irish primary school sector, including special education settings, teachers have continued the remote education of their classes in the face of enormous challenges, not least the digital divide. Notwithstanding the best efforts made, the face-to-face interaction and the close connection that teachers have with pupils in a classroom cannot be underestimated and is irreplaceable for good teaching and learning. Teachers have watched as some children have disengaged from the education system, and some – particularly those with special education needs – have regressed during the lockdown. Primary teachers, therefore, are anxious to get back to their classrooms and back to supporting their pupils' wellbeing and learning. However, it is accepted that the reopening of schools (when safe to do so based on public health advice) will have to take place in the context of continuing restrictions to prevent the spread of the virus, and that measures must be put in place to ensure that schools are safe places for all members of the school community.

The INTO welcomes the stated ambition of the Department of Education and Skills (DES) to develop "a sustainable plan to reopen schools, the overriding object of which is to protect the health of staff and students while promoting the educational development needs of the nation's children"<sup>1</sup>. This submission identifies the key issues for consideration in advance of schools reopening as well as the ongoing support that will be needed in schools during the COVID-19 crisis.

The INTO continues to engage with DES officials and with other key primary education stakeholders regarding the safe organisation of school-based summer provision for children with special educational needs and children from DEIS schools as well as planning for the safe and orderly reopening of primary and special schools. The INTO acknowledges the work done as a result of this engagement and planning to date, but is deeply concerned that with only one week remaining until the end of the academic year and the beginning of summer provision, practical guidance has not issued to schools yet.

The INTO also welcomes the commitments below in the draft programme for the next potential Government:

"The Government will ensure that as it develops reopening plans, students and parents are included, that schools have the time to implement required changes, and that students transitioning between education levels are supported.

The reopening plans will consider detailed protocols for the reopening of all schools, including learnings from other countries, incorporating flexibility for school starting times/operations and the delivery of a Summer Education Programme...

...We will seek to ensure that 6th class students are given an opportunity to mark their departure from primary school communities.

We will prepare detailed contingency plans for further potential school closures while also investing in teacher CPD to support distance and blended learning"<sup>2</sup>.

## 2. Principles underpinning a return to school

- Priority must be given to the safety and physical/mental health and wellbeing of staff, pupils and parents in primary schools;
- Children's learning and development, including their wellbeing, must be supported by schools and the relevant support services such as NEPS and CAMHs, which must have their capacity increased to cope with the needs of school communities;
- A collaborative approach to developing and implementing procedures and protocols at national level is essential. While local schools will have to adapt protocols for their particular circumstances, individual schools cannot be asked to develop their own guidance;

1. DES – *Planning for reopening schools in line with the Roadmap for reopening society and business* (2020)

2. <https://static.rasset.ie/documents/news/2020/06/draft-programme-for-govt.pdf> pg 113



- All key decision-makers should approach the health, safety and wellbeing of each other with compassion and understanding;
- Supports to schools must ensure that staffing is maintained so that no class needs to be divided in circumstances of teacher absence;
- Adequate resources must be allocated to schools by the DES to implement the comprehensive health and safety measures required for schools to operate safely;
- Assurances should be provided to schools that they will not be penalised in terms of future staffing where enrolment, as a result of non-attendance of pupils due to COVID-19, early in the 2020/21 school year falls below staffing appointment/retention figures specified for 30 September; and
- There will be a need to accommodate a changed school environment. This must be taken into account by the Inspectorate, the NCSE and other DES sections and agencies. It will be necessary to suspend inspections and initiatives other than those which are aimed at contributing to the school's efforts to maintain the health and well-being of the school community for the period of the crisis.

The INTO welcomes this week's announcement that no new school self-evaluation will be expected next year, and that the inspectorate's role will be more advisory and supportive.

### 3. Preparation for re-opening of schools

The INTO underlines the urgent need for clear guidelines and procedures for schools prior to reopening. In all cases, public health advice should underpin these guidelines and preparations in advance of the reopening of primary and special schools.

- Comprehensive public health advice should be available to parents and teachers to indicate that it is safe for schools to run summer provision and to reopen in late August and a comprehensive media and public information campaign should be carried out to assure parents of the safety of the public health situation for pupils, school staff and their families;
- Prior to any proposed reopening of schools, comprehensive testing and contact tracing systems should be in place to contain future outbreaks of COVID-19 and provide reassurance and protection for staff, parents and pupils. Because teachers will be at greater risk of infection on return to school, priority access to testing for teachers should be available as part of any community testing programme;
- Decisions on how many children and staff a school can safely accommodate must be made in line with recommendations of public health experts and the Health and Safety Authority (HSA), in consultation with the board of management (BOM) of the school. Classroom size varies from school to school, therefore there must be clear unambiguous guidelines on the number of square metres of classroom space required per pupil;
- Clear guidance must be given on the appropriate levels of personal protective equipment (if any) for use in different settings in schools, including special schools and when staff are tending to the intimate care needs of pupils or where there is a confirmed case of the virus in schools. Any such equipment must be procured centrally and supplied in sufficient quantities by the HSE/DES to schools in advance of need; and
- Clear occupational health advice must be available to teachers and other staff in schools, including pregnant women and those in at risk categories.

The INTO welcomes the DES commitment to continue to engage closely with education partners and other key stakeholders on the development of guidance and supports for the re-opening of schools. This includes the establishment of a dedicated webpage to enable the sharing of information and updates in an open and transparent manner.

It is important that adequate notice of reopening is given including a period where the BOM and staff can access the building in advance to make suitable preparations. Once appropriate guidance, resources and support is provided to schools from the DES/HSE/HPSC/HSA, this must be followed by a health and safety audit/risk assessment by the BOM/ETB to ensure that measures are in place to control and prevent the spread of the virus, including:

#### 3.1 Cleaning and hygiene

- An appropriate and robust cleaning regime must be in place, in advance of return to school and subsequently at regular intervals to prevent the spread of the virus; Schools will require cleaners to be present during the school day to maintain levels of cleanliness.



- Clear and straightforward guidance must be provided to school cleaning staff about cleaning practices which meet the advice of public health and which will instill confidence in the school community. Training for cleaners will be required.
- Extra funding will be required for the additional cleaning during summer provision and when schools reopen.
- Appropriate facilities should be in place to accommodate good hygiene practices, e.g. access to warm water, soap, hand gel; and hand-dryers/disposable paper towels. Additional funding will be required.

Public health recommendations in relation to frequent handwashing have highlighted the years of inadequate investment in school facilities as many schools do not have access to warm water or sinks in classrooms. The INTO welcomes the recent commitment by the DES to the central procurement of hand-sanitisers and PPE for schools.

### 3.2 Preventing/dealing with a case of COVID-19 at school level

- All staff and parents/carers (on behalf of pupils) should be asked to complete a questionnaire/self-declaration (on the date of return) stating that to the best of their knowledge they have no symptoms of COVID-19, are not in self isolation or awaiting the outcome of a COVID-19 test;
- A clear non-negotiable protocol must be developed centrally and put in place in each school, in line with Section E4 (pp 11-12) of the *Return to Work Safely Protocol* for dealing with a suspected case of COVID-19 in the school, up to and including closing the school where necessary;
- COVID-19 provisions must be included in the school health and safety statement with templates, instructions and checklists – including guidance on how best to isolate a pupil or member of staff when there is a suspected or confirmed case of infection – provided by the DES;
- There must be clear communication to ensure that parents and staff are aware of the measures in place in schools to prevent the spread of the virus.

## 4. Staggered attendance

It is widely acknowledged that it is very difficult to enforce physical distancing in a primary/special school setting, particularly among younger children, including those starting school and some children with special educational needs. Given the very large class sizes in Irish primary schools, adherence to current public health guidance on physical distancing would require all schools to reduce the number of children attending at one time. Recent reports by the DES have suggested that in some instances, this could be as restrictive as children attending school only one day per week. Staggered attendance, if necessary, would pose huge organisational challenges for schools, have serious educational and emotional implications for children and involve far-reaching consequences for parents in terms of childcare.

The INTO represents approximately 7,000 teachers in Northern Ireland, which is currently planning for a phased return to school, involving a mixture of physical attendance and remote learning. We are also in regular contact with our sister teacher unions across Europe to monitor how the various jurisdictions have managed the return to formal education settings. We note that in many countries where schools have already reopened, a phased reopening where not all staff and students return at the same time, combined with staggered opening and closing times, has worked well in the initial weeks. ‘Blended learning’ is one model that is being trialled with mixed results. In Ireland, distance learning would require a major investment in IT infrastructure as teachers struggle with the disparity in levels of technology and broadband available to both themselves and their pupils. It must be ensured that no student or teacher is disadvantaged during and after the time of the COVID-19 crisis because of not having access to appropriate digital and communication devices and tools or because of facing specific individual and/or social barriers. Inequalities in access to quality education due to the socioeconomic and geographical background of students must not be further exacerbated and the digital divide must be addressed.

Furthermore, reliance on distance education is not appropriate for some pupils, particularly those in the infant and junior classes and children with SEN for whom meaningful engagement with remote learning is not possible.



## 5. Social distancing and decreased interactions

In all cases it will be necessary to have appropriate measures in place to maximise and assist children with physical distancing, including:

- floor-markings, school yard markings, appropriate signage and visual reminders (in multiple languages where necessary) to remind pupils, staff and essential school visitors of good practice in preventing the spread of the virus;
- removal/rearrangement/storage of furniture to maximize space in classrooms;
- arrangements for staggered assembly and dismissal;
- staggered breaktimes for pupils and teachers;
- one-way access systems in corridors; staggered access to toilets etc.;
- NCCA-developed lesson plans to teach and reinforce the concept of physical distancing to pupils.

Individual classes will have decreased interactions with other classes and teachers in an effort to minimise contacts. This has implications for teaching methodologies, split classes and social interactions as well as challenges involving other adults entering a classroom such as substitute teachers, special education teachers and SNAs. The INTO is concerned for the safety of teachers who do not teach mainstream classes and about the potential for such teachers to spread the virus were they to be working in many classes or shared between schools.

The INTO is also concerned that mass congregating of adults near school buildings will pose a risk to everyone in school communities. Current expert advice suggests that schools – as meeting places – have major potential for spreading disease. Some primary schools are very large with 1000 + pupils in some shared sites. The congregation of parents, carers or other adults at schools, particularly at drop-off and collection times, must be actively discouraged because that is where the major potential for spreading the disease lies<sup>3</sup>. Clear communication with parents will be necessary to ensure ‘buy-in’ from the full school community in relation to this change in practice.

A severe restriction on visits to schools will also be necessary, and arrangements put in place for controlled access for essential visitors. A list of essential visitors, such as specialist teachers, therapists and NEPS, and procedures for dealing with them should be supplied to schools. Staff, pupils and essential visitors should have access to any protective equipment (e.g. masks) which are recommended by public health advice and such equipment to be centrally procured by the DES/HSE and provided to schools.

## 6. Pupil learning and welfare

Teachers have a deep concern for their pupils and their welfare. While huge efforts have been made to support pupils’ education, teachers are aware that all pupils have not been living in the same circumstances while schools are closed. When schools reopen, additional resources and supports will be required in schools from NEPS, NCSE, CAMHS and TUSLA to address social, emotional and behavioural needs which have not been addressed, and indeed may have been exacerbated during the school closure. These needs will be particularly acute for pupils in special schools and classes and DEIS schools.

Teachers will need to utilise their professional discretion to adapt the curriculum to meet the educational needs of their pupils. All pupils will require additional support in the area of well-being and SPHE. Some other curricular areas may need additional time on returning to school. The time used for staggered entry to and exit from schools, in addition to regular handwashing, will impact the amount of teaching and learning time available. If pupils have reduced time in school as a result of social distancing measures, teachers will need to prioritise aspects of the curriculum according to the needs of their pupils. In addition, there may be a requirement for the continuation of learning at home for some pupils with particular health needs. Teachers should be trusted to exercise their professional judgement, under the guidance of their principal, and with advice from the appropriate agencies including the school inspectorate.

There will also be a need to identify areas of learning that can be better addressed through distance learning. In line with current public health advice about physical distancing and children in at-risk categories, in many schools not all children in a class may be able to attend and therefore, distance learning will remain a feature of practice for the time being. Arrangements must be put in place to accommodate this. The INTO strongly emphasises that teachers cannot be expected to provide remote teaching/learning for pupils at home after or alongside teaching the pupils who are attending school.

---

3. Dr Nabarro (WHO), Dáil Committee on Covid Response, 11 June 2020



## 7. Special schools and classes

There is a huge need to provide support to children in special schools and special classes and their parents. In some special schools, many children are in the 'at risk' category and specific advice will be required for their parents in advance of a return to school. INTO Members working in special schools and classes have expressed very specific health concerns, both for themselves and their pupils, and guidance and support will be urgently required in relation to the safety of teachers and pupils in situations where pupils are unable to adhere to physical distancing measures or have intimate care needs.

Special schools and classes also require guidance in relation to PPE, and also for staff involved in intimate care. School transport concerns are very acute for this sector and guidance is needed around the safe transport of pupils and transition from school transport to the classroom.

## 8. Returning to workplace – issues for teachers

Teachers are anxious to return to their schools but are understandably concerned about a return to their workplaces. They must feel reassured that they are returning to a safe workplace, and not subject to lower levels of protection and guidance than workers in any other sector.

Teachers will also require information in relation to conditions of employment matters including:

- Access to COVID-19 leave (paid substitutable leave, not counted as sick leave).
- Clarification around provisions and conditions for self-isolation.
- Arrangements for teachers in at risk groups (HSE definition).
- Support for schools with a significant cohort of teachers in this category.
- Support for teachers (ICT etc.) to facilitate remote working, where required.
- Clarification from the public health authorities of the level of risk – or of additional risk, if any – to pregnant teachers.
- Childcare issues due to capacity issues in schools/childcare settings and the cocooning of grandparents/ others who may usually be providing care for children.
- Living with/caring for people whose health is at risk.
- Staffing supports as outlined below.

## 9. Staffing issues

The INTO submits that for a full reopening of schools, a full level of staffing, including substitution for all absences, will be required. In a situation where schools are fully reopening, the general advice published by the Department of Public Expenditure and Reform (DPER)<sup>4</sup> – that employees in the high risk category should work remotely – is not applicable. It must be noted that, in line with HSE guidance, certain categories of teacher, those at very high risk as defined by the HSE, will need to cocoon. This will require the availability of extra staff, as will arrangements for leave of absence, including self-certified and family illness absence, EPV days and other brief absences as per current circulars. There must be clear direction as to how a principal will respond if a teacher is unable to attend school because of illness or illness in their family.

In addition, specific protocols/guidance will be needed for some categories of teachers above and beyond that needed for the general teacher population. These include home school community liaison (HSCL) coordinators, EAL teachers and special education teachers who are shared between schools and substitute teachers who go from school to school. The splitting of mainstream classes into already over-crowded classes cannot be permitted as this would have the potential to undermine systems designed to prevent the spread of the virus. In respect of substitute teachers, it is important that the same group of substitute teachers service the same, and a limited number of, schools. This emphasises the need for establishment of local supply panels of substitute teachers throughout the country.

## 10. School leadership issues

As the day-to-day managers of schools, principal teachers (in conjunction with their leadership teams) will play a central role in implementing, explaining and managing the procedures to be adopted at school level. It is vital

4. *Guidance and FAQs for Public Service Employers during COVID-19* (including updates to 15 June 2020), pp 8-9. DPER



that guidance on procedures is issued centrally and implemented consistently across all schools and that this guidance is regularly reviewed in consultation with key stakeholders in light of schools' experiences after they reopen, and in tandem with changes to expert public health advice. Briefing and training for principals will be required. All absences for any training must be substitutable.

Boards of management are made up of volunteers with other daytime responsibilities and will therefore require additional financial and human resources in order to run their schools in the changed context. Principals will require time to prepare for reopening, including flexibility in the use of Croke Park hours/staff meetings for preparatory work. In large schools, non-administrative deputy principals will require one day per week with substitute cover in order to assist the principal with this extra work. Teaching principals will not be able to manage the changed reality in schools and teach their classes at the same time, therefore arrangements must be made to allow them to deal with the additional responsibilities which will fall on them. The proposed amount of 'leadership and management' release days will not be sufficient for teaching principals to effectively lead their schools after they reopen in September. Every teaching principal should have two 'release' days per week for leadership and management, and an early guarantee that they will be allowed to employ substitute teachers to cover their classes in the first term of the new school year. Significant savings to the substitute teacher budget were made by the DES in 2019/20 and these savings should be used to increase the number of leadership and management days available to every teaching principal in the 2020/21 school year.

School leaders spend a great deal of time responding to the demands of the DES and other agencies, in terms of reporting, form-filling and accountability. This should not be priority in the initial phase of school reopening. The DES should make it clear to all principal teachers that health and safety issues and the well-being and educational needs of the pupils take precedence over everything else and suspend the introduction of planned changes to the system and all non-essential paperwork for the duration of the COVID-19 crisis.

School leaders and BOMs will need clear unambiguous protocols regarding non-teaching staff – SNAs, caretakers, secretaries – who are unable to attend work because of Covid-related issues.

## 11. Communication

The main concerns for parents and carers will be the safety and wellbeing of their children in schools as well as practical considerations on how the new arrangements will work, especially for working parents. Two-way communication is vital. Fielding and responding to the questions, issues or concerns from parents and carers will be just as important as clear communication to parents and carers about how things will work.

Clear advice and guidance for parents in relation to supporting their children will be required. For example, consistent guidance and communication with parents in relation to pupil progression should be developed. Changed expectations of schools, for example in relation to the ability to teach all parts of the curriculum and/or extra-curricular activities, may need to be spelled out to avoid misunderstanding. Parents must also be given reassurance that pupils who cannot attend school due to certified Covid-related issues will not be subject to educational welfare office (EWO) referrals.

## 12. Conclusion

Reopening schools is a goal shared by all members of the school community. However, schools must not be reopened prematurely, risking a second period of enforced closure, which would compound an already difficult situation. Staff and students returning to school on a full-time basis must do so with the assurance that they are returning to a teaching and learning environment where every precaution and practical step has been taken to protect them from COVID-19. Careful, thorough and properly funded preparations must be put in place to facilitate the return, as the reality of large class sizes and years of under-investment in school facilities has exacerbated the challenges now facing school communities. Schools must have certainty that parents will not be permitted to congregate at the school's facilities prior to and after school hours as the congregation of adults will pose serious risks of the infection spreading. Ultimately, schools will need clear, unambiguous, public-health informed guidance, standard safety protocols and training, additional funding to meet the extra cleaning and sanitation needs, assurances of substitute cover for teachers on all approved absences, a comprehensive public media campaign explaining the new school environment, and the support and flexibility to manage the school day and mediate the curriculum in a manner that is most appropriate for their respective setting. The entire INTO membership is unequivocally up for the challenge of re-starting the formal school system with the expectation that its views will be taken into account and its concerns addressed by government in a full and timely manner.