

# Critical Analysis of Supports for Pupils with Additional Educational Needs and their School Leaders in Irish Primary Schools

National Principals' Forum

May 2021

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The National Principals' Forum (NPF) is a grassroots lobby group of primary school principal teachers, established in May 2018. NPF is seeking to work with the Minister for Education, management bodies and representative bodies to affect urgent changes needed to sustain principals in their roles as school leaders and help to provide the inclusive and progressive education and experiences that school communities deserve. The last time the role of principal was examined or quantified by the Department of Education (DES) was 1973. The role, as it currently exists, in no way reflects school leadership in the 21st Century.

## Introduction

Primary principals involved in the Irish education system will be aware of the repeated cuts and reductions in support for children with additional educational needs in the past number of years. This was often openly acknowledged as a fiscal measure e.g. in 2012, special education teaching resource hours were reduced by 15% per child. These "temporary" cuts have never been reversed and what followed was a series of adjustments to the system of allocation which has served as a smokescreen.

All children have the right to be educated in their local schools. Notably, this has financial implications for the Government as it is cheaper to educate a child with autism in their local school instead of transporting that child to a special school. However, mainstream schools need to be properly resourced to do so and, if resources are not granted in a timely manner, the system is destined to fail. At the centre of this failure is the child.

In tandem with these cuts, the DES and many agencies have passed on their core work directly to schools, where the responsibility lies largely with the Principal. The Inspectorate passed on the induction of newly qualified teachers (NQTs) to schools. The role of pursuing pupils with poor attendance in schools was passed from Educational Welfare Officers back to the school. The Financial Support Services Unit in the Department, (FSSU), has added huge amounts of extra financial responsibility to schools. These are only some examples. Schools are now expected to be experts in the fields of finance, revenue, building, pastoral care, social and additional educational needs (AEN) - this list is not exhaustive and further examples are well documented in previous NPF reports. While the Department of Education and the agencies will argue that they have delegated most of this work to voluntary boards of management, the reality is that almost all of this work is taken on and addressed largely by school principals, the majority of whom are teaching principals. Boards of management are generally made up of well-meaning, hard-working, but often inexperienced people who do not have the necessary legal, administrative or financial expertise necessary to manage a modern school community.

The COVID-19 Pandemic has shone a light on the entire education system, most notably in terms of highlighting the inadequacies of supports for children with AEN. Schools have been so central to the delivery of essential therapies and care needs pre-pandemic due to cuts, that when school buildings were forced to close due to COVID-19, many children with additional needs received no services (which should have been provided outside of the school in the first instance).

Schools took on extra responsibilities because vital services were not being offered elsewhere. With an already skeleton staff available to them, principals, in conjunction with teachers and special needs assistants (SNAs) in their schools, were yet again expected to do more with less.

In the coming months, the National Council for Special Education (NCSE), will be introducing two new initiatives: The School Inclusion Model and The Frontloading Model for SNA allocation. The National Principals' Forum believes that both these models will further stretch whatever small resources schools have in place. Furthermore, it will introduce further cuts to our most vulnerable pupils.

Up until now, this information has not received the critical analysis that it deserves. This report, '*Critical Analysis of Supports for Children with Additional Educational Needs, and their School Leaders in Irish Primary Schools*', has been collated from the responses of over five hundred working principals. It is divided into a number of sections and, for the first time, includes responses specifically reflecting a profile of special schools around the country, as a number of special schools from around Ireland contacted the group and asked to have their concerns brought to the fore, which are specific to their setting.

The National Principals' Forum wishes to express its sincere gratitude to the school leaders from all over the country who took the time to answer the questions in the survey and to tell their own stories, providing compelling evidence that school staffs, Boards of Managements and, most importantly, pupils are being failed due to chronic under-funding in this area.

To conclude, the National Principals' Forum formally requests that the Department of Education, all relevant stakeholders and key agencies engage with this group to discuss how pupils with additional educational needs can be properly supported. It also asks for adequate support for Principals and school management from both the DES and NCSE to ensure that pupils' rights to an inclusive and equitable educational experience are met.

The lack of transparency in relation to AEN supports from the DES and NCSE, has effectively pitted parents against schools time and again in the struggle for better support for our most vulnerable pupils. This simply cannot continue if our education system and pupils within it are to thrive as they should.

Is sinne le meas,

The National Principals' Forum Administration Team

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# Background Information

## What is the Frontloading Model (in theory)?

The Frontloading allocation model for Special Needs Assistants (SNAs) means that schools no longer apply to the NCSE for SNA support for an individual child. The profiling system currently being used for special education teaching will allegedly be used to allocate resources, breaking the link with the need for an assessment.

An appeals mechanism will be included to deal with exceptional cases in schools. It is stated that the responsibility for deploying said resources lies with the principal of the school who is instructed that the greatest need should be prioritised. If there is not enough support in the first place how can a principal be held responsible for the children whose needs are not met? Also, it is not an exceptional occurrence that children with AEN, in need of SNA support, would seek to enrol in a school each year, or mid-year. This should not necessitate an arduous and designedly difficult 'exceptional review application'. Movement of pupils and families is a common occurrence and should be accommodated through a timely and respectful process.

## How will it work (in reality)?

There should be an honest, transparent and accessible mechanism for the NCSE's **exact** profiling of a school's AEN each year. Resources should be allocated to meet these exact needs which can change year to year. If a school requires additional SNA support for children, there should be a timely and straightforward application process for acquiring these supports. It should **not** necessitate an inordinate amount of paperwork, much of which is duplicated as it is already with the NCSE. Every day that a pupil is left with inadequate SNA access and resources equates to a day when their needs are not being met. This is not inclusive education. The following testimonial is one of many examples of principals' experiences in appealing SET allocations.

*"In the past five years I have appealed our school's SET allocation unsuccessfully on four separate occasions. Our AEN school profile has changed entirely in this time. Our two SET teachers have thirty- three pupils on Student Support Plus plans before we ever engage in group supports. Similarly, our last five applications for additional SNA support for new pupils, some with severe life-threatening care needs, were declined by our SENO. We were told to manage within our existing allocation. We strive to cope, to split our SNAs in as many pieces as we can, but the reality is that the allocation does not match the needs in our school. We are doing our best, but it is not enough. We are having to turn pupils away because we simply cannot cope. It has become a health and safety issue and is, not least, a human rights issue".*

Teaching Principal with Special Classes, Munster

The exceptional review process is a distressing and largely unsuccessful experience for schools, many being told after all this work and effort, to simply manage with their existing allocation. Parents who have been notified that their child has been granted SNA access, (despite no additional SNAs being appointed to the school) will be advised to 'talk to the principal' if they are unhappy with the support being provided. The lack of crucial SNA support mitigates against a child's ability to cope in a school or class, and negatively impacts

on the entire class. This system cannot be allowed to go ahead as planned, as it will perpetuate the existing deficiencies for pupils with AEN in the education system.

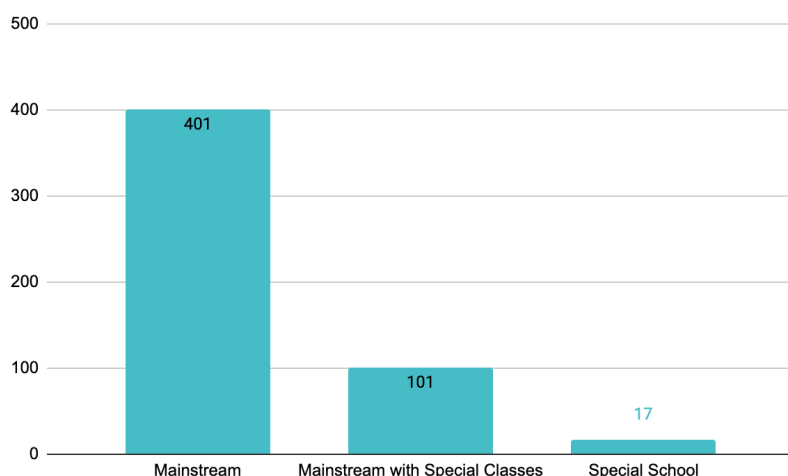
### **School Inclusion Model - Alleged key features:**

- A new frontloading allocation model for Special Needs Assistants
- A profiling system for Special Education Teaching (SET) to be used to allocate resources, breaking the link with the need for an assessment.
- An appeals mechanism to be included to deal with exceptional cases in schools.
- National Educational Psychological Service (NEPS) to be expanded to provide more intensive support.
- Additional psychologists to be recruited for the pilot programme, giving greater access to a range of in-school support for students with complex educational needs.
- SNAs to be offered a new National Training Programme, designed to equip them with the skills and knowledge to support students with additional care needs arising from significant medical, physical, emotional/behavioural, sensory, communication and other significant difficulties that pose a barrier to participating in school life. Training will emphasise the need for students to develop independence and resilience.
- A new national nursing service for children with complex medical needs in schools.
- A cross agency planning group to be established to develop the scope for the scheme, develop an application procedure for schools and plan for how the service is to be delivered. The new service will complement current provision provided through community-based services.
- A Regional Support Team will be set up for schools in the pilot programme, under the auspices of the NCSE. The team will include four Speech and Language Therapists, two Occupational Therapists and four Behaviour Support Practitioners, nineteen Speech and Language Therapists and twelve Occupational Therapists to deliver support within schools countrywide.
- Consultation with schools, teachers and parents.

The current Continuum of Support model could be an effective model, were it adequately supported and staffed. With the current model being so poorly supported at present, the National Principals' Forum is fearful of the proposed model. NPF recommends that the DES and the NCSE consult with school leaders, teachers, SNAs, pupils and parents, so that credence can be given to the input of the professionals who work in schools before introducing another new model on top of an already under-resourced model.

## Critical Analysis of Supports for Children with Additional Educational Needs, and their School Leaders in Irish Primary Schools: Demographics of Survey Respondents:

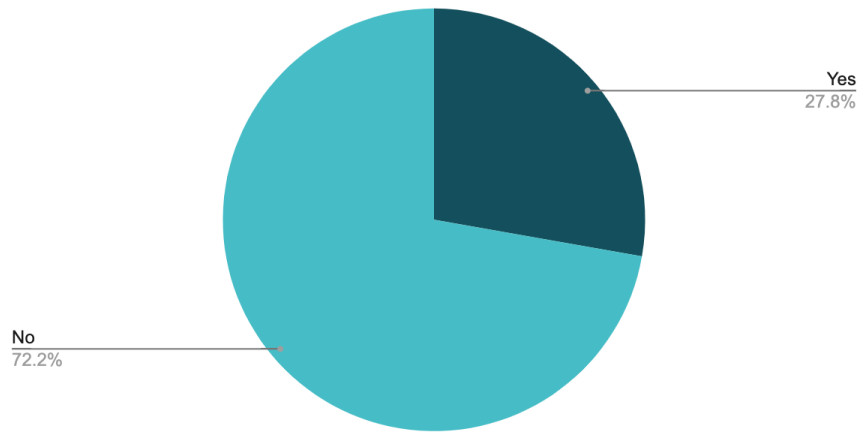
The survey used to compile this report was sent to all primary schools listed on the Department of Education database. The response rate was 519 school principals, or approximately 17% of all primary principals, an excellent sample size, which compares favourably to surveys released by similar stakeholders. Responses were recorded from every county in the Republic of Ireland. At the request of special school principals, we ensured that sections of the survey were dedicated completely to special schools in order to ensure that a critical and accurate analysis could be carried out. 12.5% of all special schools responded to the survey.



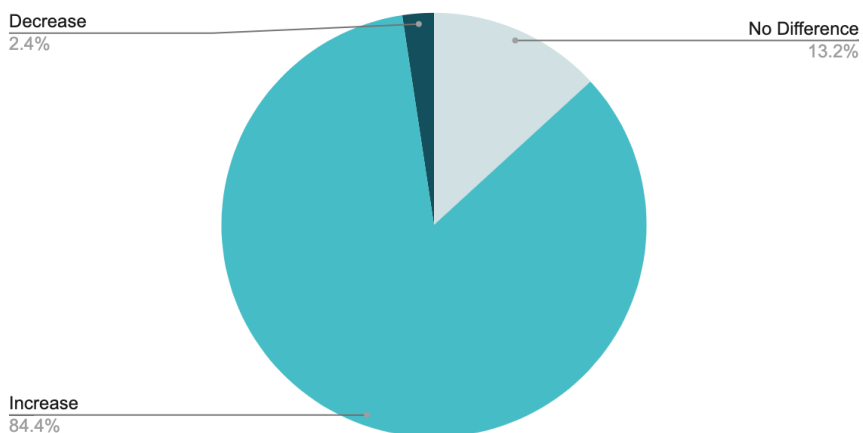
51% of responses were from teaching principals and 49% were from administrative principals. 23% of respondents were based in DEIS schools and 77% were non DEIS schools. Schools reported an average of eight mainstream class teachers and 4.5 SET teachers and 4.5 SNAs per school.

# Graphical Overview of the Key Findings in this Report

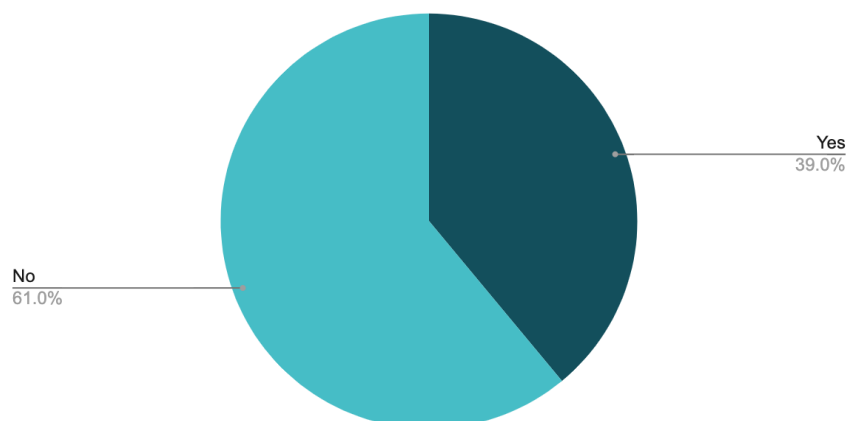
Does your current SET allocation meet the needs of AEN (Additional Educational Needs) provision in your school?



In the last 4 years, has there been an increase in numbers of children with AEN (Additional Educational Needs?)

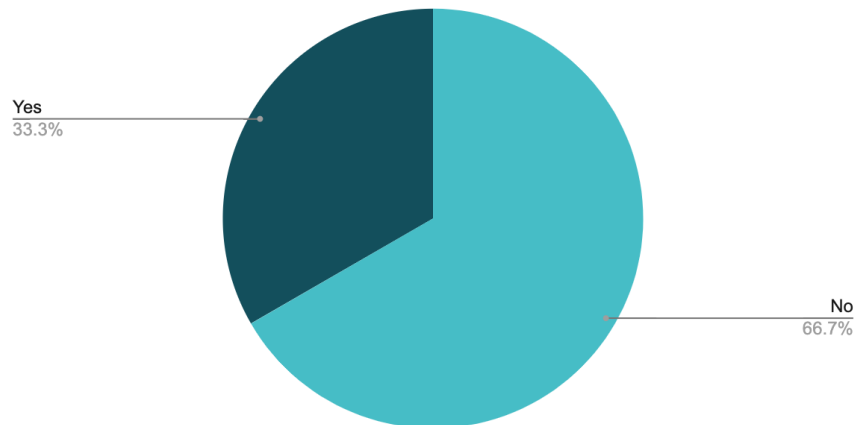


Does your current SNA allocation meet the needs of SEN provision in your school?

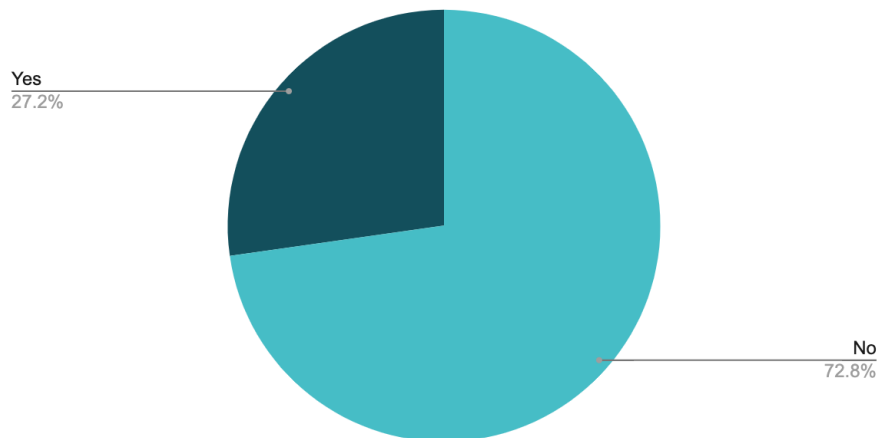




Does the funding for your special classes cover the cost of running them?



Should the NCSE be allowed to oblige schools to open special classes?



## Recommendations

Following an analysis of these findings, the National Principals' Forum has compiled the following nine recommendations which, if implemented, would improve the provisions in a meaningful way for all pupils with additional educational needs and for the staff working with them in primary schools in Ireland.

The following are the recommendations from the National Principals' Forum:

1. Increase SET allocations to meet the needs of AEN Provision
2. Recognise the workload involved in the management of additional educational needs by school leaders
3. Put in place safeguards to prioritise the health of principals
4. Organise SET allocations centrally at the Department of Education
5. Allocate adequate supports to special schools
6. NCSE to investigate all SNA allocation appeals to the NCSE in a timely manner

7. Allow more consultation before the implementation of the Frontloading Model
8. Review Section 37a of the Education Act
9. Restructure the NCSE

## 1: Increase Special Education Teacher (SET) allocations to meet the needs of Additional Educational Needs (AEN) Provision

Prior to 2017, pupils with AEN were granted individual allocations of Resource time (hours per week) relevant to their diagnosis. Schools were granted Learning Support (group) hours based on the school size (5 hours per mainstream class). When additional children with AEN joined the school, an application was made for additional hours and they were granted once the child had a relevant assessment/professional report. Their AEN support time was safeguarded. This was to meet the need for pupils with a diagnosis, but offered no further support to children awaiting assessment, nor to schools trying to meet their needs without adequate provisions being allocated to them by the DES or NCSE.

In 2017 the DES introduced a new system for allocation of additional teaching hours to support children with AEN -The Continuum of Support. The move was touted as a huge positive, ensuring that all children would receive support, with or without an official diagnosis or report. Greater scope and autonomy was given to schools to decide how to allocate their SET time. Of course, with autonomy comes responsibility leaving schools with the unenviable task of choosing which pupils to prioritise. This new system was a merging of former Resource and Learning Support hours. The schools were profiled for the new allocation of SET hours by the NCSE using various metrics, none of which included exact AEN information from schools themselves. Therefore, many schools were left with a two year fixed allocation of SET time which did not meet the needs of their pupils with AEN. From there, a 'loaves and fishes' style provision was born.

Instead of this system being more equitable as was heralded, it is inadequately resourced. Pupils with an official diagnosis are no longer given automatic access to Resource or Learning Support hours (now called SET), but, instead, have had their allocation reduced. The greatest needs are prioritised in the school overall, but now many pupils are neither getting what they needed nor what they would have been entitled to under the old model. The NPF documented this succinctly in its report '[The Inclusion Illusion](#)' in late 2019. 88.4% of school leaders reported that they had inadequate SET time and fewer supports for their AEN pupils in 2019 than they had in 2012.

Stealth cuts, first introduced in 2012, continue to creep into our system under the guise of new initiatives. Despite statements from ministers and advocacy groups in recent months about "being on the side of pupils with SEN," none have proposed reversing these cuts. The NPF does not envisage this proposed Frontloading Model being any different.

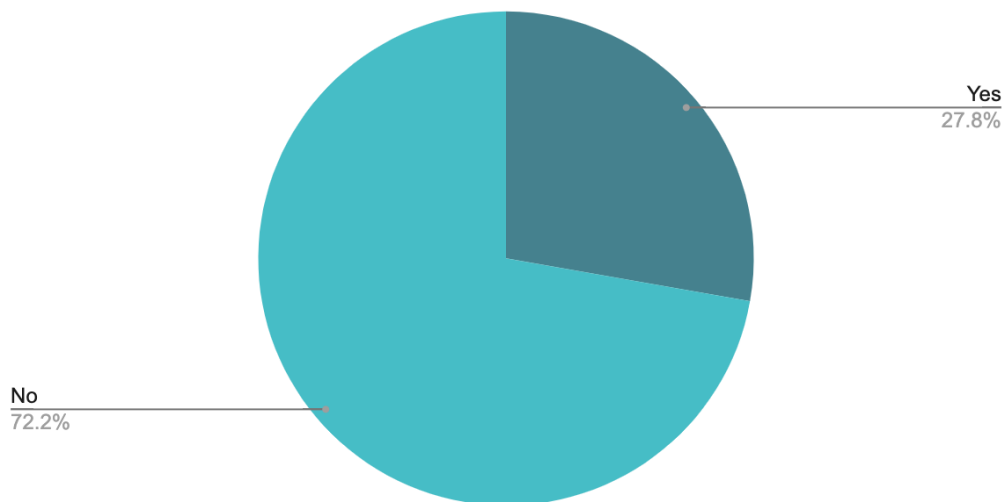
While an appeals mechanism exists for SET allocations, it is designed for most schools to fail in their application. Of those surveyed, only 8% of appeals have succeeded in additional hours being allocated. One example of hundreds of comments in our survey was:

*“A lot of paperwork involved in the process of making an appeal but ended up with no additional hours.”*

(Principal DEIS 2 school, Co. Cork)

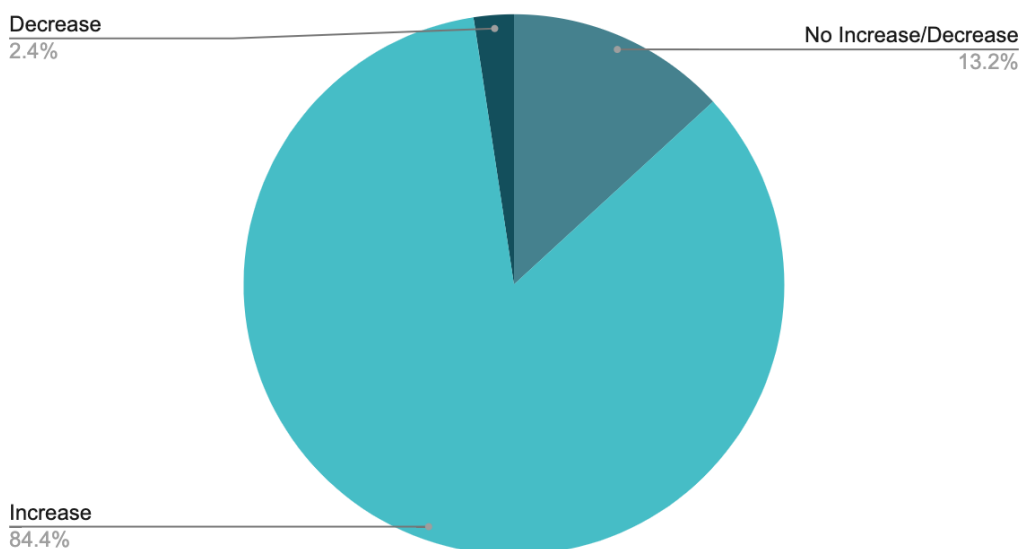
84.4% of schools surveyed have seen an increase in pupils with AEN in the past 4 years. Only 72.2% of those schools feel that their current SET allocation meets the needs of AEN in their schools.

Does your current SET allocation meet the needs of AEN (Additional Educational Needs) provision in your school?



It is also important to note that there has been a steady rise of enrolments of children with additional educational needs in mainstream classes across the country. This is not compensated by an increase in SET or SNA supports from the NCSE/DES in most cases. This fact is hidden by political statistics and spin, which cite an increase in the total number of SNAs and an increase to the overall education budget. While there are indeed increases in budgets, they do not correspond to the increases in needs nor is there ever a reference to the rise in enrolments of pupils with AEN.

## Increase in pupils with AEN in last 4 years



## 2: Recognise the Workload Involved in the Management of Additional Educational Needs by School Leaders

Managing the Special Education Team is a mammoth responsibility and according to our survey, roughly half of principals take on this job themselves (48.5%). In 30% of cases, the Deputy Principal leads this role. In schools where there is an administrative principal, 32.7% of them take on this role, (33% Deputy Principal, Assistant Principal 27%). In schools where there is a teaching principal, 63.9% of principals take on this role, (12.9% Deputy Principal, 12.6% Assistant Principal).

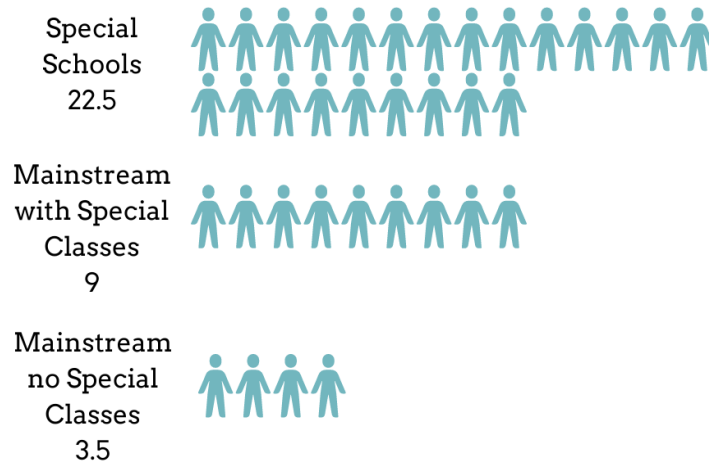
The average number of hours that principals reported spending managing the area of Additional Educational Needs was 6.8 hours per week on top of their regular hours. 13.5% of respondents spent 15 hours or more per week managing AEN.

Each school has a unique profile and, as such, the allocation of special needs assistants is determined by the needs in the school. The majority of schools have at least one SNA. In many cases, especially for special schools or schools with special classes, there can be a high proportion of SNAs employed (see graphic below). This brings an added responsibility for principals from a management perspective - from the initial interview process right through to retirement or redeployment. However, this duty is not recognised for pay or staff allocation purposes. The Principal is accountable for the issuing of contracts, day to day management, personnel issues, timetabling of allocations, timetabling breaks, staff wellbeing etc.

The introduction of a special class (or classes) can double the staffing of a small school overnight. To give an example - a principal managing and teaching in a school with 4

mainstream classes, 2 SET positions and 2 special classes is remunerated to manage themselves and 3 other teachers. In reality, that Principal manages 8 teachers, 9 SNAs, multiple bus escorts and usually a part time secretary and caretaker - a total of 20+ staff. This is on top of full teaching duties and regular day to day management of a school.

Average number of SNAs per school type



The above data does not include the management of bus escorts, school nurses, secretaries, caretakers or any other non-teaching staff. It is time now that every school leader should be recognised for not only managing their teaching staff, but also all other members of staff (teaching and non-teaching). The responsibility that the Principal has for all members of staff needs to be recognised.

It is not just monetary compensation that school leaders require for management. There also needs to be a change to the criteria for the threshold for when teaching principals become administrative principals. This must be based on all members of staff, not just mainstream teachers and enrolments. Any school with special classes must have an administrative principal.

### 3: Put in Place Safeguards to Prioritise the Health of Principals

The National Principals' Forum presented research to the Oireachtas Committee in 2018. It showed that 84% of teaching principals surveyed had considered stepping down from their position at some point.

Since then, principals have faced increased, chronic pressure directly as a result of their role; from uncertainty of SNA allocations, increased administration duties, uncertainty about the NCSE Frontloading Model, leading schools during a global pandemic, two lockdowns, a substitute teacher crisis, worsening communication from the Department of Education. This has led to a further erosion of personal rest time.

The Covid-19 Pandemic has presented challenges to all professions and principals are no different. It is increasingly obvious from NPF research that principals' health and well-being are being seriously impacted as a result with each passing year.

The NPF has regularly surveyed principals on their mental and physical health. The results have been startling and this is reflected in the enormous exodus of principals and deputy principals from these roles. On April 30th, 2021 there were thirty-eight principal and eleven deputy principal positions advertised on educationposts.ie alone.

In this survey, Principals reported the following negative effects on their health.

Mental Health  70%

Physical Health  58%

70% of principals reported their mental health has suffered and 58% reported their physical health had suffered as a direct result of their job. While the DES regularly discuss the importance of wellbeing, none of their documents or initiatives look at the role of the school leader. The NPF recommends that the DES engage directly with practising school leaders to begin to understand the stress they are under as they carry out their role and how it directly impacts on their mental and physical health. A duty of care to school leaders has been conveniently ignored for far too long, to the detriment of school leadership.

## 4: SET Allocations to be Organised Centrally by the Department of Education

In 2017, the Department of Education and NCSE changed the method for allocating AEN provision based on the following algorithm:

*“It proposed that the allocation of additional teaching supports to schools be, in future, based on a school’s educational profile, comprised of two components:*

1. *Baseline component provided to every mainstream school to support inclusion, assistance with learning difficulties and early intervention, and*
2. *A school educational profile component, which takes into account:*
  - a. *The number of pupils with complex needs enrolled in the school.*
  - b. *The learning support needs of pupils as evidenced by standardised test results.*
  - c. *The social context of the school including disadvantage and gender.*

*The combination of a baseline allocation based on school enrolments and a profiled allocation will produce a more equitable outcome for each school, recognising that all schools need special needs support. It will offer a graduated allocation which will take into account the level of need, whether future or predicted, and the pupil mixture in each school.”*

This algorithm produced a certain number of hours per week of provision for each school. For every twenty-five hours, a school was allocated one permanent member of SET staff. Any remaining hours had to be clustered with other schools to make up as many 25-hour posts as possible. The DES and NCSE also left it to schools to organise these clusters themselves. These clusters were very difficult to arrange as many schools were left with tiny fractions of hours to cluster rather than the DES rounding the hours to the nearest hour.

This led to what has been colloquially coined “The Cluster Games,” where principals “fought” to make up clusters as quickly as possible. This disadvantaged teaching principals in particular, as they could not dedicate as much time as administrative principals to forming local clusters. However, most principals would agree, clustering schools is a waste of their precious time which would be better served elsewhere.

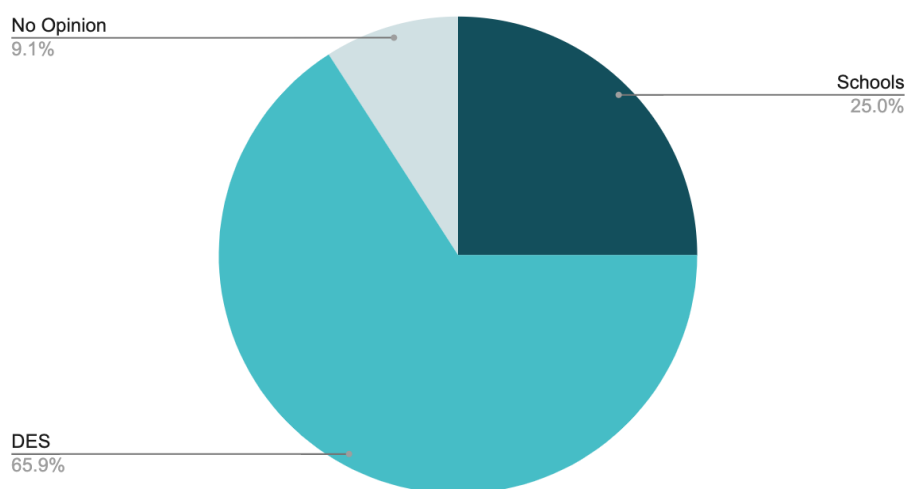
There is ample evidence from other studies, such as “*Meet the Kids Behind the Cuts*”, to demonstrate that the system punishes developing schools in terms of equity of allocation. One in three developing schools reported that they have been negatively affected by the SET allocation model.

The system is clearly flawed as 25% of schools appealed their SET allocation. Despite this high number of appeals, very few have been successful. One respondent stated:

*“A poor and frustrating experience - we were told we were 89th in the queue for an appeal and 2 years later we still haven't had our review. All the time our caseload keeps increasing.”*

In this survey, 66% of principals believe that the DES should organise the clustering of SET allocations. This could easily be done through computer simulation and pairing up local schools together to make up full time sustainable posts.

Who should organise clustering for SET Allocations?



Since 2017, there have been two updates to the SET allocation. However, in both cases, the algorithm has not been fully recalculated using the original formula. Schools have generally kept the hours they had in 2017. Developing schools are awarded 3 hours if their school increases by a single class, and 8 hours if their school increases by 2 classes in a single year.

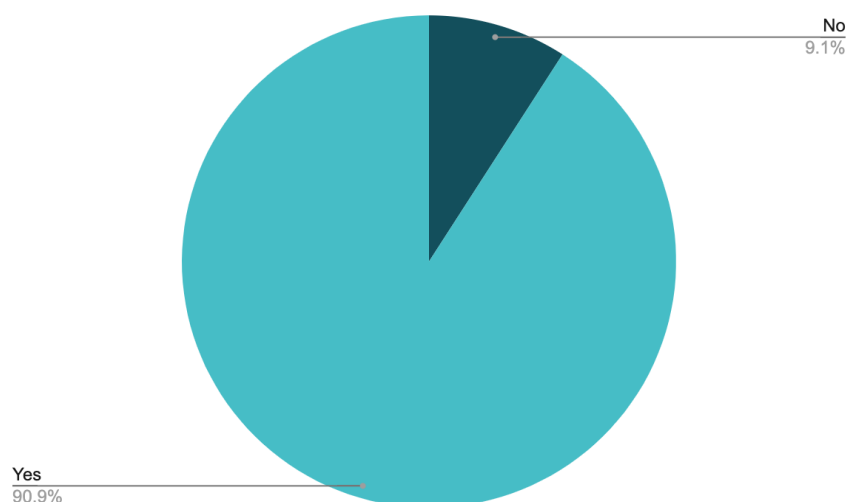
The NPF recommends that the DES recalculate SET allocations using the same algorithm as in 2017 for each re-evaluation of the allocations and would also welcome the opportunity to assist the DES in reshaping SET allocations.

Schools should be clustered by geographical region. The hours allocated must also be increased to reflect the additional difficulties pupils are facing post lockdowns and remote learning. Tellingly, all the rhetoric surrounding reopening schools for pupils with AEN and SEN did not produce one minute of additional teaching time for 2021/2022. In addition, the DES must ensure that developing schools receive an equitable allocation of hours, in line with other schools.

## 5: Allocate Adequate Supports to Special Schools

82% of special school principals surveyed state their SNA provision is insufficient. This is of grave concern. Furthermore, despite nearly 60% of special schools having an exceptional review in the last five years, in 90% of cases, they received no increase in support.

The NPF asked principals of Special Schools if their school had been told to meet the needs of additional enrolments in their school without increasing their allocation. The results were stark.





41% of principals reported that a child with obvious and severe needs, due to enrol in their school for the next academic year, was refused access to an SNA.

70.5% of principals reported that they felt a child, or a staff member, was in danger where a particular child was refused access to SNA provision. Special schools need to be adequately supported in order to carry out their work.

Principals in special schools identified the supports their schools require:

- Certainty around special school status
- Special school status protected in law
- Dedicated teacher to liaise between mainstream school, families and special school
- Dedicated training and leave, with guaranteed substitute cover, for staff to attend training, *prior* to taking up positions
- Provision of dedicated support teams to support special schools e.g. SLT, OT, etc.
- Dedicated NCSE section for supports and allocations
- Flexibility for teachers to engage with teacher exchanges
- Automatic administrative status for principal and deputy principal

Special schools should not be seen as closed institutions. They are vibrant school communities with enormous reserves of expertise and experience which they are willing to share. Links between mainstream schools and special schools should be fostered and supported by the DES. Each special school should have a specialised teacher who fosters exchanges between the school and local mainstream schools. Teacher exchanges between special schools and mainstream schools should be the norm.

The NCSE have attempted to close some special provisions, (e.g. children with dyslexia) because they claim these children are not "included". The model in the reading schools is an example of inclusion at its best. Children temporarily leave a mainstream setting for a period of intensive intervention. They then return to mainstream schooling equipped with the strategies to allow them to be fully included in mainstream school life. In the absence of specially trained literacy teachers, we should be looking to expand this model with properly resourced links between mainstream and special schools.

Special School placements also have many other advantages such as the availability of more intervention services, nursing staff, resources, etc. Staff are often more experienced in managing pupils with various types of Additional Educational Needs. They will have built a collective wealth of knowledge from those experiences. Children attending a special school recognise that their peers are working at a pace similar to their own.

48.1% of principals in mainstream schools with special classes report that special classes are not appropriate settings for pupils with severe needs. While it would be ideal for every child to attend their local school, a special school placement is sometimes a much more appropriate setting. Therefore special schools need to be adequately resourced.

## 6: NCSE to Investigate all SNA Allocation Appeals in a Timely Manner

If a school is not able to meet the needs of their pupils with their allocation, they are entitled to make an appeal. During 2021, there has been no official mechanism made available for making an appeal due to the transition from the current model to the proposed paused Frontloading Model. Consequently, no applications have been accepted for several months at this time of this report being published.

Since 2016, if a school requires additional SET hours, it must firstly submit an application to review its current allocation. This process may take several months. Each pupil receiving SNA access must have a personal pupil profile, including a plan for how the SNA is supporting his/her care needs. The SENO reviews these plans when considering the school's current allocation. According to the NPF survey, the NCSE rarely increases the allocation.

In fact, in almost 40% of appeals sent in by principals surveyed, it is reported that the school was informed that their allocation would remain the same without any visit from the SENO. Despite the fact that schools went to huge lengths to appeal their allocation, the NCSE did not ask SENOs to visit or speak to school staff. All decisions were made with no investigation into the claims from schools. This faceless model must be addressed urgently.

It is worth noting that a child receiving the highest levels of support in preschool will not carry this support automatically into primary school. Furthermore, a child in a special class in primary school has no guarantee of a place in a second level special class without a full psychological review. Moreover, if a child is in receipt of resources in one placement, and they transition to a different placement, their resources do not travel with them. The application process has to start again and there is no guarantee of approval.

## 7: Continue the “Pause” of the Frontloading Model to Allow for More Consultation Before implementation

While the Frontloading Model has been discussed in some detail, the final format of the model is not available at the time of publication of this report. Just before the COVID-19 pandemic hit our shores in March 2020, both the Irish National Teachers Organisation (INTO) and the Irish Primary Principals Network (IPPN) vehemently opposed this new model for allocating SNAs to schools; both seeking the DES to pause the rollout for at least a year.

However, the year was interrupted by the Pandemic and, as schools and stakeholders spent their time trying to keep schools open and safe from the threat of COVID-19, the Frontloading Model reared its head again in early 2021.

The NPF asked principals if they were in favour of this model. A very small number of principals were in favour of the model:

*“It is easier to plan for and gives more stability to SNAs. We won’t have to submit so much paperwork”*

However, the vast majority of respondents were not in favour:

*“The NCSE to date has continually imposed savage cuts to SEN and AEN. I have no confidence in them to implement a fairer model. I fear that we will be left with current allocations to appease schools for a short period. This Frontloading Model will then see reduced services to schools.”*

Reading the responses in more detail, of those that were in favour of the model, the reasons seemed to be less systematic and more suited to the particular school’s situation. In fact, 38% of those in favour of the model said it was because either their enrolments were dropping, or children with SEN were leaving their school and they would retain their allocation.



*67.2% of principals reported that they do not have a full understanding of the Frontloading Model.*

Worryingly, despite the fact that it might be presumed that most principals would know about the Frontloading model, 67.2% of principals do not have a full understanding of what the model will look like. This is a very high percentage and cannot simply be blamed on principals not making themselves aware of the changes coming down the line.

*Almost 1 in 5 schools (18%) will have an increase in numbers of children requiring SNA access but will have no children with SNA access leaving the school to make up the shortfall.*

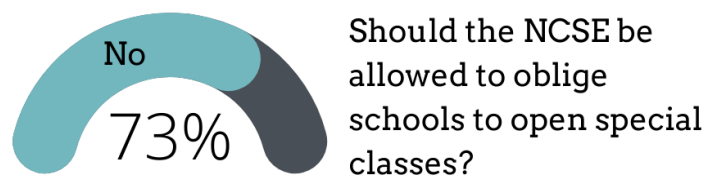
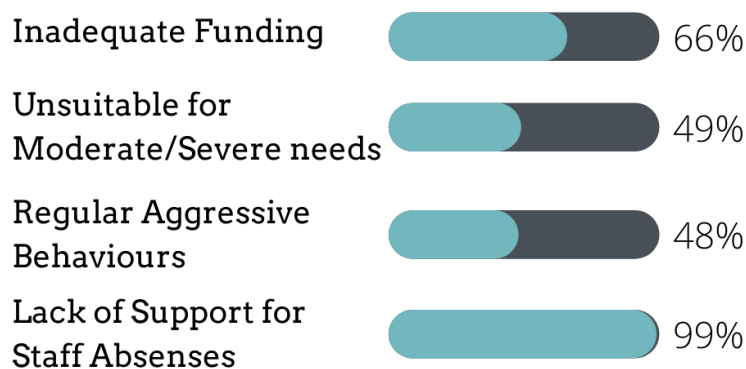
It is essential that the Frontloading Model is explained in full, prior to being rolled-out in schools. While this may delay the roll-out by another year, it is objectionable that such a big change to the terms and conditions of a school manager would be released without them receiving adequate information about the system. This is underlined by the fact that only 8.9% of principals believe the model is a good idea while 70% of principals report they don’t believe they will have adequate SNA support in 2021-22. With 18% of schools welcoming new enrolments with significant additional needs into their school, and with no AEN children leaving, this will mean a further stretching of already overburdened resources.

## 8: Review Section 37a of the Education Act

Under provisions in the Admissions' Bill that came into force in late 2018, the Minister for Education now has the power to compel a school to open a special class, following a process of consultation with the NCSE, the Board of Management and the patron of a school.

Many schools are reluctant to open special classes in their schools for a number of reasons. While the Government, media and advocacy groups tend to vilify schools when they refuse to open special classes, it is important to listen to the voices of these schools instead of scapegoating them. The National Principals' Forum asked principals with special classes a number of questions to ascertain the reality of opening a Special Class in a school. This feedback should be helpful to decision makers when looking to open schools. Simply having a room available in a school is no reason to open a class, if minimal supports cannot be achieved.

Survey respondents stated that the following were reasons not to open special classes:



The following statistics were reported by all principals who have opened special classes: 99% of respondents reported that when the teacher is absent from their class, there is no proper provision to cover the class and in the majority of cases, a SET teacher or the principal themselves covers this class. 50% of principals reported that special classes are not currently suitable to children with moderate or severe needs.

*“There is a huge range of difficulties in our Special Class. 5 out of 6 children there do not belong in a mainstream special class. Without doubt they need a special school with access to the interventions needed. My staff in the Special Class are on the verge of taking stress leave.”*

As special classes do not differentiate between children with mild diagnoses and those with more severe diagnoses, one respondent stated that it is impossible to balance the “*academic needs of children who have mild diagnosis with life skills and intensive 1-1 teaching of children with much greater needs.*” Many principals reported that children with moderate needs are receiving no support from occupational therapists or speech and language therapists. Almost 50% of principals reported regular aggressive behaviours.

However, the most notable statistic here was that, despite all of these schools having opened special classes, the high majority believe that no school should be compelled to open a special class. We asked respondents for reasons why this would be and this is a sample selection:

1. *“We set up two classes with no support from the DES apart from the once-off grant. I have spent in excess of €45,000 which we had to beg, borrow and steal from others to get the basic resources required.”*
2. *“The absence of a coherent collaborative structured approach to adequately address the needs of children, a multi-agency approach removes responsibility and hence workload is carried at school level.”*
3. *“I have spent most of my time, including holidays this year, dealing with issues arising from the special class.”*
4. *“Our school nearly doubled in size due to our new early intervention preschool building. Heating, electricity and insurance also doubled. Grants should reflect the size of the building and not just the number of children - only 12 children in this part of the school.”*

Further investigation into the experiences of principals that have opened special classes must be addressed before forcing schools to open classes which could be more damaging to the pupils. It is critical to the success of a special class in a mainstream school that there is a willingness among staff to engage meaningfully with training and that all teachers, mainstream and special class are open to integrating the pupils fully into school life. Pupils who are not ready for integration and who are struggling long-term to survive in a mainstream school, may need the support of a special school. A sense of belonging can never be achieved by a child if their placement is not optimal.

## 9: Restructure the NCSE

The National Principals’ Forum recommends that a full review of the NCSE takes place and a new child-centred system of allocating resources takes place with the needs of the child being followed from early years all the way through to the end of the student’s schooling. Students should have access to support for whatever needs are recommended by an educational psychologist. The current moves towards Frontloading supports do not take individual children into consideration.

The National Council for Special Education was first established as an independent statutory body by order of the Minister for Education and Science in December 2003. From 1 October 2005, it has been formally established under the Education for Persons with Special Educational Needs Act 2004 (EPSEN Act) even though this act is yet to be fully implemented.

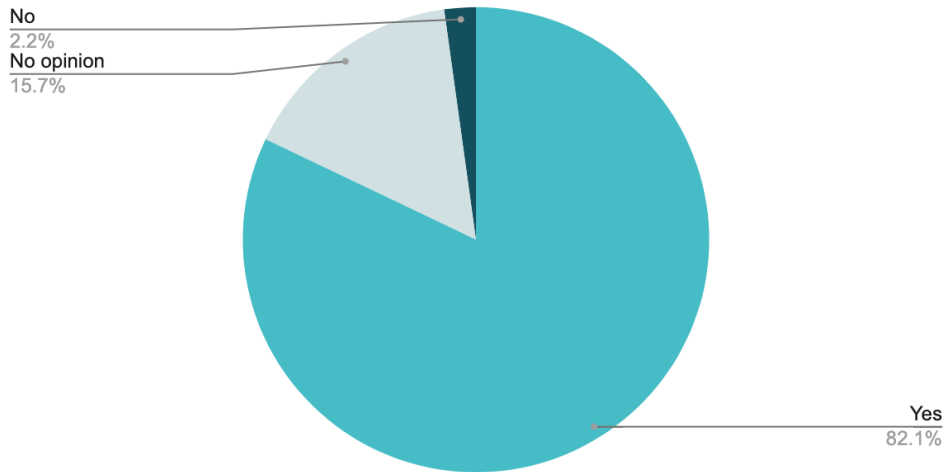
The general functions of the Council as set out in Section 20 of the EPSEN Act are as follows:

- Planning and coordinating provision of education and support services to children with special educational needs.
- Disseminating information on best practice concerning the education of children with special educational needs.
- Providing information to parents in relation to the entitlements of children with special educational needs.
- Assessing and reviewing resources required by children with special educational needs.
- Ensuring that progress of students with special educational needs is monitored and reviewed.
- Reviewing education provision for adults with disabilities.
- Advising educational institutions on best practice.
- Consulting with voluntary bodies.
- Advising the Minister for Education on matters relating to special education.
- Conducting research and publishing findings.

The NCSE has moved from addressing individual school needs to an overall top down allocation model. This has placed the administration of resources for pupils with AEN on the shoulders of principals, who have neither the authority nor the remit to allocate resources to their own schools, despite knowing exactly what is needed to support all pupils, most especially pupils with additional educational needs.

Respondents to the survey were emphatic in their opinion as to whether the entire structure of the NCSE must be looked at. Principals were asked to rate the NCSE's service from 0 to 10 with an average score of **3.98**. While these scores alone do not give a lot of insight into the success of the agency, comments relating to the NCSE performances indicate that principals believe that the NCSE needs to be accountable and also needs a restructure.

Do you think the entire structure of the NCSE needs to be looked at?



Refusing access to relevant support for children, based on bureaucratic reasons, is a common reason as reported by principals, with 58% reporting that they have had a pupil with obvious and severe needs being refused an SNA on a minor technicality. As stated earlier, of the almost 40% of appeals sent in by principals, they reported that the school was informed that their allocation would remain the same without any further investigation from the NCSE. This is clearly a demonstration of a model of bureaucracy rather than a needs-based one.

*“Where to start? Dealing with the NCSE for one. It's been one of the most frustrating parts of my role as principal.”*

Comments from principals, time and time again, report increasing frustrations with the NCSE erecting unnecessary barriers to schools applying for support for children with additional educational needs. It is nothing new to see a recommendation from an educational psychologist urging the need for significant SNA support and for the NCSE to simply disregard that recommendation. However, principals report further issues with the NCSE.

*“The NCSE looks at numbers only but does not take into account the reality on the ground. Some children need some SNA support. Others need full time 1:1 SNA contact all day everyday.”*

The NPF was similarly concerned in late 2019 when the NCSE Conference with a theme of ‘Inclusive Education Systems & Teacher Education for Inclusion’, introduced moves towards a ‘Total Inclusion Model’, and featured speakers espousing the merits of a ‘Total Inclusion Model’, including a speaker from New Brunswick Canada. Total Inclusion in other countries such as Canada and Portugal is firstly not comparable with Ireland due to vastly different school support structures and demographics. Secondly the NCSE completely failed to consult with its own home-grown experts when it comes to inclusive education - those school leaders at the helm, on the ground, leading school communities as inclusively as possible with very limited AEN supports.

The NPF consulted with members of the NBTA (New Brunswick Teacher Association) and enquired about their experience of the Total Inclusion Model there following this conference.

*“In NB (New Brunswick), the NBTA which is the professional association that represents the vast majority of public-school teachers in the Anglophone sector supports the concept of inclusion, but it does believe that Policy 322 that was enacted in 2013 needs significant revision. The difference between the policy commitments and the resources provided to support these is very significant. We have significant concerns about having positive learning environments in classrooms for all students, which of course, should be a given. The main priority of teachers in this province is revising this policy. It all sounds great on paper, but the reality is far different. It is a model that is enormously complex to apply and expensive to support”.*

NBTA Representative

This was the verdict from teachers in New Brunswick in schools already supported by nurses, psychologists, occupational therapists, speech therapists and many other services available to them, which are **not** in place in the vast majority of our primary schools. Our current AEN model is so grossly under-resourced and under-supported, that a move to a ‘total inclusion model’ would be catastrophic, as there is already a track record of NCSE failure to adequately support pupils with AEN in Irish primary schools under the current model. As in the case of the NBTA, the NPF fully supports the concept of inclusion, but also knows that words without action are futile, and schools cannot do more with less. We do not currently know where the NCSE stands in relation to the ‘Total Inclusion Model’ that was proposed in 2019. Clarity on this matter is necessary at this juncture.

The Minister for Education is quick to announce numbers when it comes to Special Educational Needs. The persistent claims of spending 20% of the Education Budget, or €2bn on Special Education is money-centred, not child-centred. Huge amounts of time are spent trying to reduce budgets instead of increasing services. More and more onerous paperwork and red tape is added instead of simplifying the system to ensure children get the support they need in a timely and efficient manner. Pupils spend eight vital years in the primary school system. They cannot afford delays to access supports they require.

In order to ensure that a proper review of the NCSE takes place, a structure for special education needs must have practising principals, teachers, SNAs, parents and pupils, as well as special educational needs organisers (SENO) and intervention specialists on it. The NCSE should be working with schools instead of against them. It is prioritising finances, not vulnerable children or struggling schools.

## Conclusion

The nine recommendations have been collated from the responses of over 500 principals who took time to share their experiences of working within a system that immediately needs reform. The palpable levels of frustration from the survey responses are overwhelming. School leaders want the very best for their school communities, including for those pupils with additional educational needs. School leaders are utterly frustrated at the innumerable barriers and the ever-increasing bureaucracy encountered.



A system that began as a child-centred one, has gradually descended into one which is money-centred. The DES and NCSE no longer refer to children when they speak about special education but refer to the amount of money that is spent in the sector.

This report provides a number of key recommendations that could make the Irish Primary Education System a child-centred one, rather than focusing on costs. It asks for agencies to offer appropriate resources to address individual needs of children, rather than blanket algorithm-based budgets, which do not serve schools' current needs. It also recommends that appropriate staffing be given to schools and that school leaders are recompensed for the duties of managing their staff.

Rather than plastering over the cracks of SEN provision with systems like the School Inclusion Model and the Frontloading Model, school leaders have stated that the Irish Government must implement the EPSEN Act (2004) **fully** to ensure that the DES provides all appropriate resources in a timely manner to pupils in schools. The Act promotes inclusive education for learners with SEN. It covers the assessment and identification of SEN, and the development and implementation of education plans for learners with assessed SEN. It confers on parents a series of rights in relation to their child with SEN. Thus far, only part of this Act has been enacted, and therein lies the nub of most of the systemic failures in the education system despite the very best efforts of educators.

The legislation is not enacted to protect the most vulnerable in the Irish Education System. In addition to this, school leaders also feel that the NCSE needs a full restructure, as it is not fit for purpose.

The NPF also specifically included special schools in their survey. The overwhelming call from school leaders in special schools was to ensure that they remain an important part of the conversation about the education landscape and that their schools are properly supported and resourced. Many have been battling for a very long time with little positive change or supports given to alleviate the pressure on all concerned.

The National Principals' Forum would like to acknowledge the 519 school leaders who contributed to the survey. On January 21st last, Norma Foley, the Minister for Education, stated categorically in Dáil Éireann that she was "on the side of children with special needs". It is now time that she and the Irish Government back up this statement with the necessary resources. The pupils in Irish primary schools are the adults of the future. They must be given access to all the relevant resources needed in a timely manner so that they can reach their true and full potential.

In order to achieve this, school leaders and under-supported staff in primary schools all over Ireland must also be given access to the support and resources they need to reach this common goal.

## Appendix 1: Glossary

AEN	Additional Educational Needs
DEIS	Delivering Equality of Opportunity in Schools
DES	Department of Education and Skills
EAL	English as an Additional Language
EPSEN	Education for Persons with Special Educational Needs
GAM	General Allocation Model
IPPN	Irish Primary Principals' Network
NCSE	National Council for Special Education
NEPS	National Educational Psychological Service
NPF	National Principals' Forum
POD	Primary Online Database
SEN	Special Education Needs
SENO	Special Education Needs Organiser
SET	Special Education Teacher
SNA	Special Needs Assistant

## Appendix 2:

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