

Appendix 7i

Refined Identification Model for the DEIS Programme - Submission of Observations

Background Information:	Following a presentation given by the ERC on 12th March regarding the refined identification model for the DEIS programme, the Department requested observations from stakeholders.
Link to progress update:	https://www.education.ie/en/Press-Events/Press-Releases/2021-press-releases/PR21-03-01.html
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	05/05/2020

ACCS welcomes the opportunity to make observations on the new Identification model for DEIS.

We welcome the opportunity that it will give schools, who previously were frustrated with a non-DEIS designation, to participate at some level. The sliding scale of designation has the potential to target resources more equitably. The recognition of changing school circumstances, of 'pockets' of disadvantage within schools and changing demographics would seem to be more inclusive of more grades of disadvantage and this is to be welcomed.

However, in expanding participation, the core purpose of DEIS, to enable schools make a real difference to the educational opportunities of those coming to education at serious disadvantage, must be protected. Broadening participation cannot result in a reduction in support to DEIS schools working in the most disadvantaged circumstances.

In this context, it is important to recognise what the current range of supports enables the most disadvantaged schools to put in place. Take for example the additional staff allocation. DEIS schools, especially DEIS Band 1, must make provision for a smaller 'top stream' cohort, a larger group of students with a range of special educational needs, students from diverse groups and some very disturbed students. The best possible educational provision must be made for all. The demands on the school timetable are therefore much greater. For students with the potential to progress to 3rd level schools must ensure they offer all subjects necessary as an entry requirement. This means timetabling classes for smaller numbers of students in subjects such as higher level Maths, Physics, Chemistry, Accounting etc. While significant progress has been made, the DEIS 2017 Progression target of 30% by 2019, shows the extent of the gap that has yet to be narrowed. Schools must continue to have a staffing allocation to enable such provision. The Literacy and Numeracy evaluation of DEIS illustrates the high proportion of students with serious literacy and numeracy deficits and the need for further targeted measures to reduce existing gaps. Again, this has implication for the timetable and is more demanding on staffing than what might be expected in non DEIS schools. The range of subjects (e.g. provision of alternative subjects alongside languages, sciences etc) and programmes (e.g. LCA, JCSP, Literacy and Numeracy initiatives) makes significant demands on the timetable. Non-DEIS schools, with less diverse student populations do not have the same demands on the timetable.

A higher proportion of students need personal support, advice, counselling, motivation and encouragement to reach their potential or sometimes just to remain in education or to survive very challenging personal/family circumstances. Guidance Counsellors and HSCLE teachers are a central part of this support. The impact of current school closure on the education of students from DEIS schools highlights the degree to which students rely on the support and encouragement of their teachers and schools. Each pillar of the DEIS plan allows practical and positive supports to be put in place which strengthen students links with education and compensate for home and local

circumstances that make it impossible for students to engage on an equal footing to their peers with strong family and environmental supports.

The financial supports of DEIS allow schools to put in place, many of the supports, others would take for granted. After school study, revision programmes, subject tuition, exposure to a world beyond the local community and the provision of books/equipment all play a vital part in breaking cycles of disadvantage. The ability to provide such interventions cannot be diluted in any way, even inadvertently by a new model of identification.

We believe that the expansion of the DEIS scheme will require additional funding to meet newly identified needs. Many of the supports DEIS schools recognise as essential already exist in schools with small cohorts of less advantaged students.

There is some concern regarding the capacity of the new Identification Model to fully capture the make up of a school's population. Increasingly DEIS schools have students who are resident in hotels, emergency accommodation or living with extended families. Also, a sizable number of students have addresses in areas of 'private housing'. However, these homes/apartments have been rented by the local councils and the families have been placed in these homes. Some move on a regular basis. Is the model capable of accurately overcoming the imbalance this presents?

So too with students with newcomer families who come to schools with very particular needs and requiring intense support. Schools have very targeted interventions in place to support these students and their families, interventions that are resource heavy. Can the model identify and include this cohort of students for the purposes of identifying school needs?

Examination results, the percentage of students taking higher and retention were factors in the identification of DEIS schools. Will these continue to be factors in the new identification model. The briefing referred to data from PPod but without specific reference to the above. These factors do have a merit as indicators of the gap between schools.

Schools that will be comprehended in any way by the new model must also be willing to embrace a full range of educational provision. All must be willing and indeed facilitated to offer the programmes to meet the needs of educationally/socially disadvantaged students. A willingness to engage in provision of Leaving Certificate Applied, L1/2 Learning Programmes, Special Needs Provision, JCSP and Special Class should be among the conditions of receiving enhanced supports.

In conclusion, DEIS has made a very real difference to the ability of schools to improve the educational opportunities of students. Equally in helping students cope with and overcome very difficult personal circumstances. Undoubtedly enabling an increased number of schools to engage in similar provision will enhance further the opportunities for less advantaged students. However, while recognising that the measures put in place to date are narrowing the gap, there remains a need for long-term commitment to adequately support schools with high proportions of disadvantaged students.

Appendix 7ii

Submission to the Special Committee on Covid-19 Response

Background Information:	Following the establishment of the Special Committee on Covid-19 Response, ACCS were requested to make a brief written submission on issues related to education.
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	19/06/2020

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1. Introduction

- 1.1 The Association of Community and Comprehensive Schools, ACCS is the management body which advises, supports and represents the Boards of Management and in school management teams of 96 post primary schools across Ireland.
- 1.2 Community Schools provide a comprehensive system of post-primary education open to all the children of the local community in a multi-denominational setting reflect of the pluralist characteristic of Irish society. An innovative approach to delivery of a wide-ranging curriculum contributes to the spiritual, moral, mental, physical and social well-being of students within their community. Community Schools may also provide for life-long learning within their local community through the provision of adult education programmes. Comprehensive Schools are denominational schools but in a similar fashion promote inclusion of all children of the community in a comprehensive system of education.

2. Executive Summary

- 2.1 The ACCS was represented on the Working Group for Contingency Planning for State Examinations 2020 by the General Secretary, John Irwin. The purpose of this group, chaired by the Secretary General of the Department of Educational and Skills, is twofold:
 1. Identify and advise the Minister and SEC on altered arrangements for the running of the state examinations and the certification of students' learning in 2020 and any consequential actions.
 2. Respect the function/role of the Minister and the State Examinations Commission as the relevant decision-making bodies in respect of the state examinations and certification of students' learning.
- 2.2 The group consisted of representatives of students, parents, teachers, school management, the State Examinations Commission and the Department of Education and Skills. Contributions were also presented by the National Council for Curriculum and Assessment, the Higher Education Authority and the National Educational Psychological Service. This consultative process was very much in line with the vision of partnership envisaged in the Education Act 1998. The engagement was very focused, and it was beneficial for all present to listen to and share perspectives on the challenges faced by students completing post primary education in 2020.
- 2.3 The challenge faced was how best to recognise and certify the completion of post primary education and provide pathways for students to transition to the next phase of their lives be that higher education, further education, apprenticeship or directly to the workforce. The discussions were very focused given the immediacy of the challenge and while views may have differed discussions, while on occasion robust, were always respectful.
- 2.4 Once the decision was reached that it was not advisable to progress with the traditional Leaving Certificate Examinations this challenge began to focus on developing a credible alternative. The Leaving Certificate, while not perfect, commands a lot of confidence based on its perceived objectivity. The two elements of the Calculated Grades System, combining school estimated marks underpinned by teacher professional judgement and a national standardisation process to ensure equity across schools, is based on sound principles and best practice. The development of the calculated Grades System and associated guidance and support materials in an eight-week period to replace the traditional Leaving Certificate was a significant achievement.
- 2.5 The reopening of schools is now being considered by a working group established by the Department of Education and Skills. This submission provides preliminary thoughts on these preparations as this is an ongoing process.

3. Leaving Certificate or alternative assessment process

- 3.1 The preference of students and parents was for a process of predicting student grades while that of the management bodies, teacher unions, Department and Minister was to investigate the potential of running the examinations with as many elements of the Leaving Certificate. A notable feature of the process was the confidence of student representatives in the professionalism of their teachers in estimating marks of students' work.
- 3.2 A significant part of the process in reaching the eventual decision to replace the Leaving Certificate with an alternative process were papers prepared and presented by the State Examinations Commission, SEC, on the feasibility of running all aspects of assessment of the Leaving Certificate. Two significant papers were considered:
 1. SEC Options Paper on Project/Coursework and Practical Examinations.

2. Consideration of a Model for Delivering the Leaving Certificate Examinations Observing Social Distancing and Other Measures intended to reduce risk to public health and safety.

Both papers highlighted the significant challenges in trying to run the Leaving Certificate. Several aspects of assessment had already been compromised and the running of the examinations would be anything but normal for the students of 2020. The lack of access to schools from 13th March would potentially disadvantage disadvantaged students even further. It became apparent the examinations would become a process for some students and not all students.

- 3.3 On arriving at a decision to replace the Leaving Certificate with an alternative process of assessment considerable inputs from the SEC and the Inspectorate of the Department were considered in detail and worked up to the Calculated Grades Procedure 2020.

4. Calculated Grades

Process around calculated grades

- 4.1 The two elements of the calculated grades procedure are:
 1. The school-based procedure of establishing estimated marks and class rankings
 2. A national standardisation process to arrive at a Calculated Grade.
- 4.2 Central to the school estimated mark is the individual and collective professionalism of teachers. At an individual level, teachers examined a range of sources of evidence, class and term assessments, assignments, project, practical and oral work along with engagement with course material. On a collective basis, teachers engaged with alignment groups where professional conversations and consideration of each other's estimated marks aimed to produce consistent standards across a subject area in schools. The alignment of estimated marks is an essential component of the in-school process.
- 4.3 The oversight by the school Principal aimed to ensure consistency of application of the procedures and, where necessary, ask alignment groups to reconsider estimated marks. From conversations with school Principals a limited number of reviews took place in most schools, where required, and were engaged in positively by teachers when requested. School Principals have expressed their confidence in the professionalism of teachers and reflected the positivity with which teachers engaged in the process to ensure the estimated mark of students reflected a realistic estimate of students level of achievement if the Leaving Certificate had proceeded as normal.
- 4.4 The importance, in the first instance, of the professional judgement of the teacher is evident as is the oversight of the process through the alignment groups and the role of the school Principal. The process of creating a school estimated mark as opposed to a teacher estimated mark through professional conversations and oversight of the process should assist in ensuring the quality of the information transferred by the school to the Calculated Grades Office of the Department. Again, the evidence emanating from schools highlights the professionalism with which teachers engaged in this process.
- 4.5 The research presented by the State Examinations Commission highlighted the importance of the professional judgement of the teacher if this alternative assessment process is to be successful. Teachers have knowledge of their students and access to multiple sources of evidence to support their judgement. This is backed by two key elements of research-based evidence:
 - Teachers are good at estimating student performance in assessment tests.
 - Teachers are also good at ranking student performance within teaching groups.This coupled with the professional conversations facilitated through alignment groups refined estimated marks to ensure consistency. The oversight of the Principal in identifying outliers or any potential error and seek a review by an alignment group provided the last step in maximising the quality of data transferring from the school. It is also significant that in their oversight role the Principal has no power to amend the estimated marks based on the teachers' professional judgement following engagement in the alignment process.
- 4.6 It will be interesting to see how the standardisation process effects school estimated marks as they arrive at a Calculated Grade. The standardisation process appears based on sound principles:
 - National data sets in subject areas
 - School based data sets
 - Data sets held by the State Examination Commission relating to the 2020 cohort of students in each individual school

The triangulation of these data sets with the school based estimated mark should ensure students receive a fair Calculated Grade. This process should also capture any anomalies where there may have been 'overcompensation' in school estimated marks as feared by some.

- 4.7 The success of the Calculated Grade process will hinge on the combination of the quality of the data submitted by schools and the standardisation process. There is an expressed fear that students in 'disadvantaged schools', a term I don't like but is the accepted term, may be penalised if previous school data sets are not strong. The Department are acutely aware of this perception through the consultation process and ensure checks and balances will exist in the process to minimise the risk of this happening.

5. Non-school students

- 5.1 This really breaks down into two distinct groups:

1. External candidates seeking to sit examinations within the school.
2. Students of the school entered for examinations in which they are not following a course of study in the school.

The provision of a separate process for external candidates sitting examinations in schools is essential as the students are not registered in school and will not appear on school data sets.

- 5.2 Students of the school entered for the examinations but not studying the subject within the school are been addressed through the school. In cases where there is evidence which the school can validate schools are happy to do so based on an estimated mark submitted on a Form A to the school. The greatest challenge here is the non-curricular languages where often the student does not have a tutor or may have been preparing for the examination with a parent at home. In many cases schools are not able to validate these estimated marks and will indicate such to the Department. This is a significant and very identifiable cohort of students who would normally receive certification through the Leaving Certificate. Some schools have indicated this is an example of the divide in Irish society as a significant proportion of these students are migrants and would not have been able to engage private tutors/teachers.
- 5.3 The approach advised to schools is to include as opposed to exclude where possible but there must be evidence which the school is happy to validate as a reliable source to support the estimated mark.

6. Impact on CAO system and third-level admissions

- 6.1 It is welcome that the Higher Education Authority, HEA, has confirmed that Calculated Grades will be accepted as the basis for calculating points used to identify college entry offers in a similar way to the grades received through the normal Leaving Certificate. It is also welcome that the ongoing process of entry to fields of study as opposed to specialist programmes will continue to be explored. At times, the simplistic approach taken by some commentators that all applicants should be allowed entry to whatever college course they sought in 2020 was uninformed and unhelpful.
- 6.2 For the 70% of post primary students who apply through the CAO and with a similar approach being taken to the issuing of offers through the CAO system, it is hoped this will operate successfully for applicants.

7. In Conclusion

- 7.1 There are several elements of the Calculated Grades Procedure that must be noted:

- Stakeholder engagement process
- The role of the student voice
- The professionalism of teachers and school leaders

- 7.2 The engagement of stakeholders in the consultation process was consistent with the partnership envisaged in the Education Act 1998. It was clear from the beginning that the students completing post primary education 2020 were the central focus of the discussions. Without doubt the decision to replace the Leaving Certificate with the Calculated Grades Procedure was correct on three grounds:

- The health and wellbeing of students and the wider community.
- The modes of assessment for the Leaving Certificate had been significantly compromised.
- It was clear on advice at the time it would not be an examination for all students as a significant number would not be able to sit the examination.

For those of us very attached to the Leaving Certificate it was with a heavy heart but nonetheless the correct decision to replace the Leaving Certificate of 2020 with an alternative model of assessment of students' work.

- 7.3 It was refreshing to have student representatives present at the table. Their contribution was always of interest and measured. It was very much consistent with the Constitutional provision that where possible a person's voice is heard when a decision which will impact on them is being arrived at.
- 7.4 Throughout the process the professionalism of the teaching profession and school leaders has been exemplary. When needed they were not found wanting initially agreeing on the postponement of examinations to late July to reopen schools for tuition in early/mid-July and engage in examinations and corrections through August and corrections into the new academic year. When this was cancelled, they engaged, through their leadership, in discussion to ensure the alternative was workable, achievable and, most of all, fair to students. In schools they have engaged in the process wholeheartedly. The leadership in schools has also engaged ensuring the process has operated as efficiently as possible.
- 7.5 There have been issues along the way that have irked and caused irritation at times. The stakeholder engagement was hugely beneficial ensuring 'buy in' by all participants but of its nature takes time. There was impatience expressed by commentators at times about the process. It was evident from being engaged in the process the Department was keen to have details of alternatives available prior to making announcements. In this regard, when the cancellation of the examinations was announced and there was a lag in issuing guidance and training to schools significant frustration was expressed. The perception that the process was at times media driven was unhelpful. On occasion school leadership felt they were receiving information regarding important decisions through the media as opposed to through official channels.
- 7.6 Replacing the Leaving Certificate with a credible alternative in such a short period of time is a significant achievement. In this regard the leadership of the Minister and his officials in the Department of Education and Skills and the State Examination Commission deserve great credit. The response from the majority of schools has been positive regarding the system. There were exceptions where the rigour of the oversight process, it being primarily focused on process and procedure, was questioned. It is an interesting procedure and may provide valuable learning for the future.

8. Return to School

- 8.1 The focus in post primary schools has been on completing the Calculated Grades Procedure and thoughts have not fully engaged in reopening of schools in the next academic term. As a management body ACCS is engaged in the Department of Education and Skills Working Group addressing this particular issue. ACCS fully supports the aim of the group which is to facilitate a safe return to school for all students and staff. The Working Group is also seeking to alleviate the burden on schools by providing materials, support and guidance centrally.

- 8.2 Challenges for re-opening of schools and procedures that will need to be put in place

The Working Group established by the Department has committed to the following being in place for schools:

- Template documentation required to meet the school's obligations of the return to work protocol.
- Online training for all school staff developed centrally.
- Guidelines on cleaning and hygiene procedures required in schools and additional funding to schools to meet these requirements.
- Guidance on the continuity of learning for students including any amendments to curricula.

This collaborative approach will provide consistency of approach across schools and assist school management in meeting their obligations.

- 8.3 How will schools operate with social distancing

In a word, with great difficulty. In the event the 2m rule remains in place next September it is difficult to see schools open to students. Even with 1m social distancing it will be challenging. Post primary schools by their nature and design are not conducive to social distancing. The suggestion of 'pods' or 'bubbles' does not account for the fact the majority of students are not assigned to a base class but attend in teaching groups designed around student subject choice. This involves significant movement around buildings during the course of the school day by students. The optimum is obviously a need for no social distancing, but this will be determined by the public health experts to ensure safety of staff and students.

8.4 Impact on students and teachers

The impact of lack of social engagement provided through schools on students is well documented and significant. For most students there will be a current educational deficit. While schools have engaged significantly with students since the school closure in March, this cannot replace attendance by students in school. Over the last number of weeks teachers throughout the country have engaged significantly in remote emergency teaching and upskilled in online practices significantly. On return to school most still believe not all students will be able to attend school so a blended learning approach will have to be adopted. ACCS, like others, is developing materials to support schools in this area but significant investment in time will be required to deliver such programmes effectively. There will be students and teachers with underlying conditions who may not be in a position to return to school.

8.5 Impact on parents and children

One of the key aspects is socialisation. There will also be the concern of a growing educational deficit and its potential impact come State Examination/Certification time. Many parents will worry for the wellbeing of their children but also health risks if a full return to school without social distancing if it applies in other settings outside of schools. While not as significant as in primary, the ability of parents to attend work if students are not in school. These issues are significantly enhanced when addressing the needs of students with complex/additional educational needs.

8.6 Impact on special needs education

Very significant. Many students with complex needs cannot engage in a virtual environment. On a return to school there are a significant number for whom social distancing, if in place, would be very challenging. Many students with complex needs require access to school to avail of an appropriate education. Without such access there is a significant risk of educational regression.

8.7 Advantages/disadvantages and challenges of staggered attendance

The main advantage is adherence to social distancing if required. It is essential all students have engagement in face to face tuition. The main challenges will be ensuring consistency and equity of provision for students. A blended learning approach will result in significant time challenges for teachers in preparing and delivering materials in several different scenarios. It is clearly preferable to no access to schools. The proposed idea of some students attending school in the morning and a different cohort in the afternoon is not practical for many schools given transport issues and the cleaning regimes required.

8.8 Thank you for the opportunity to engage in this process. Clearly the work around school reopening is ongoing. From a post primary perspective, the optimum is no requirement for social distancing in an environment where hand and respiratory hygiene are key. We look forward to working with the Department and other stakeholders progressing work in preparing for school reopening.

Appendix 7iii

Observations on the Child Protection and Safeguarding Inspection Model

Background Information:	<p>The Child Protection and Safeguarding Inspection (CPSI) model was formally approved by the Minister for Education and Skills in January 2019.</p> <p>The Inspectorate planned to review the CPSI model before the end of the school year. This review is an important opportunity to identify what is working well in the CPSI model and what, if anything, needs to be further developed. Equally importantly it will enable the Department to identify further supports that schools may require in order to implement the Child Protection Procedures for Primary and Post Primary Schools 2017.</p> <p>As part of the review process, ACCS were asked to submit observations on the revised Guide to Child Protection and Safeguarding Inspections.</p>
Link to Agreed Document:	https://www.education.ie/en/Circulars-and-Forms/Active-Circulars/cl0072_2020.pdf
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	02/07/2020

The most important comment is that the guidelines are very good and very clear, all comments should be seen in this context and are sought to add to the process.

1. Please see below observations added to CPSI Overview of proposed changes.
2. Observations received from schools who have engaged in the process
3. Additional comments on AUP and Parental Consent
4. While not directly the responsibility of the Inspectorate, concerns regarding the naming of school personnel to the BOM when Tulsa advise an allegation does not meet a threshold of harm and is not reportable.

Observations from schools:

- *One issue that could receive a bit more attention is the learning and meeting spaces in a school; maybe it is already included but particularly in older schools. In relation to meeting rooms, offices, project store rooms, PE store rooms, etc. or indeed in some cases isolated classrooms,*
 - *are school authorities satisfied that all learning and meeting spaces etc. are designed and managed so that all interactions, (particularly ONE TO ONE) take place so that a child would not feel isolated, at risk or uncomfortable in the space.*
- *There still appears to be confusion confused as to when to use and when codes are require. Attention should be drawn to the additional guidance issued by the Department.*

AUP and Parental Consent

I could not see any legal obligation under child protection law where one could say it was required to obtain parental consent for online learning.

The Data Protection Act governs “information society services accessed by children” and sets the requirement for parental consent age to end at 16, however “information society services” are defined as anything at a distance, at the request of the recipient of the services and where the service is offered for remuneration. Clearly none of that applies in this context.

The issue of consent was something we considered back in March/April and opted for legitimate interests and fulfilment of legal obligation to deliver/provide an education as being the appropriate legal basis for processing in the circumstances. We urged parents to satisfy themselves as to the nature of the students accessing their classes online and the privacy issues around that.

We would require clarity on the legal requirement, if any, for this proposed protocol for capturing of consent. It seems potentially unworkable.

You had mentioned also Oversight of the Board, section 9 of the Child Protection Procedure but I couldn't recall if you had a specific concern here? I can look at that again if you could remind me.

Concerns regarding the Child Protection Procedures

- Concerns regarding the disclosure to boards of the name of an individual against whom an allegation has been made where the threshold for reporting the allegation to Tusla was not met. This is a breach of privacy of the individual which is not justifiable when they are not deemed to have committed any wrongdoing. The sharing of their name may have a detrimental effect on their confidence and well-being; and on their relationship with the school and with the board.
- Safety of children must absolutely always come first, and there is no issue with the sharing of a name with the board where a report has been made. However, an unfounded allegation may be made against anybody, anytime, and people have a right to have their good name protected. Any disclosure of a name in this context has a high risk of damaging that good name. The school may then be exposed to claims under employment, data protection and defamation law.
- The lack of information available to schools when a report against a member of school personnel is made directly to the Department of Education and Skills. It is not commonly known what procedures are followed by the DES and these procedures are not consistent or aligned with those that apply in schools.

Page Number	Proposed addition / deletion
3	To add: CPSI inspection visits in schools with boarding facilities do not include inspection of the school's boarding facilities, their management or their compliance with the Child Protection Procedures for Primary and Post-Primary Schools 2017.
4	To add: Review of the following documents including the school's IT Acceptable Use Policy
4	To add: Footnote 3. In special schools and in junior schools the inspector may request the teacher to engage with learners about a number of topics in SPHE/ RSE to replace the focus group meeting with learners.
4	To add: Footnote 4. The AUP is checked to ensure that it outlines the approaches the school has decided to undertake when engaging in distance learning with their pupils/ students and If there is a protocol in place to acquire parental consent prior to any online conferencing/ communications taking place.
17	To add 'not involving school personnel' in the sub-check as follows: Where there were cases under section 9.6 of the procedures (not involving personnel) the board was provided with all of the documents specified in sections 9.6.2 of the procedures in respect of each such case
17	To remove the footnote: Note that where the DLP has reported the concern to Tusla, in general no documentation is reported to the board for oversight. Where a member of staff who is not the DLP has sent a report to Tusla, this must be reported to the board with supporting documentation. Please refer to 9.6 of the procedures
18	To change the sub-check from: A hardcopy file is available for all the child protection concerns which contains original records of the concern, all correspondence relevant to the concern and the names of all relevant individuals to A hardcopy file is available for all child protection concerns which contains original, unredacted records of the concern and all correspondence relevant to the concern.

Appendix 7 iv

Joint Submission requesting adequate resourcing is made available to school management to deal with issues relating to the reopening of schools for the new academic year.



The Association of Community and Comprehensive Schools (ACCSS), the Education and Training Boards Ireland (ETBI), the Joint Managerial Body (JMB) and the National Association of Principals and Deputy Principals (NAPD) request that adequate resourcing is made available to school management to deal with issues relating to the reopening of schools for the new academic year.

The extra resources are requested in two areas:

- 1. An extra allocation of hours to be deployed at management discretion based on an enhanced PTR of .5 to each school/ETB**
- 2. An augmented Supervision allowance for each school to comprehend the increased supervision that will be warranted in schools at this time, an extra 33 hours per teacher for the year**

1. An extra allocation of hours to be deployed at management discretion based on an enhanced PTR of .5 to each school/ETB

Following an analysis of the emerging issues, below is an indicative list of the issues that management will need assistance with specifically as a result of the Covid emergency. We are conscious that this list is not exhaustive. It is anticipated that a significant body of the hours will be required as a resource to assist school management in preparing for school reopening, and that the rest of the hours will be used in an ongoing manner throughout the year at management discretion to deal with ongoing Covid related matters.

Example tasks:

- Covid-19 Response Plan to be prepared and kept under review
- Risk assessment and Safety Statement to be updated and kept under review
- Pre- Return to Work (RTW) self-assessment questionnaire to be distributed and collated and responded to appropriately
- On-going consultation with all staff
- Organisation of a training module to be delivered for a Return to Work
- Planning to start on social distancing arrangements for school – one-way systems, use of lifts, classroom layouts, social distancing screens, social areas, etc. and ongoing review
- Break time arrangements to be implemented and reviewed
- Arrangements for visitors and deliveries to be prepared, monitored and reviewed
- Sign in-sign out procedures to be implemented and monitored (including contact tracing)
- Dealing with someone who develops signs and symptoms of Covid-19 on school campus and follow up
- Need to identify and isolation area(s) within building and maintenance of those facilities
- Ongoing review of the Code of Behaviour in light of prevailing circumstances
- Guidance to be prepared for staff if working from home and providing follow up and support

- Transport arrangements to be monitored and reviewed, particularly drop off and collection areas
- Developing and monitoring the safe use of equipment in specialist rooms
- Implementing First Aid procedures in light of prevailing guidelines
- Implementing adequate and safe Supervision arrangements for students
- Managing the use of PPE that will be required by staff
- Implementing and managing a protocol for work activities by staff where physical distancing is not possible
- Developing a schedule for increased, routine cleaning and disinfection of all frequently touched surfaces within the school campus and monitoring/managing this process
- Managing a procedure for staff when handling books and equipment
- Ensuring that hand hygiene and respiratory etiquette protocols are in place and adhered to
- Ensuring that hand washing facilities and sanitisers are in multiple locations and ensuring that they are maintained appropriately
- Ensuring that necessary signage and information displayed for the management of Covid-19 are in place at all times
- Managing waste collection
- Managing and monitoring of access to and egress from school campus
- Providing the Lead Worker Representative(s) with information and guidance around a safe return to work, medical information, personal responsibility and duties
- Ongoing liaison with Lead Worker Representative(s)
- Assisting senior management team in ensuring staff and students are provided with necessary information and guidance to prepare for school reopening
- Providing updated procedures to all in the school community and visitors
- Ongoing review of arrangements for classrooms in light of public health policy and the necessary control measures required to protect the health and safety of staff and pupils
- Ongoing review of arrangements for administration areas in light of public health policy and the necessary control measures required to protect health and safety of staff and students
- Preparation, implementation and management of the social distancing plan
- Ground markings (2m currently)/indicative stickers to be considered
- Monitoring the cleaning regime, records etc.
- Organisation and management of equipment in classrooms
- Ongoing provision of essential cleaning materials for staff to keep their own work areas clean i.e. wipes/disinfection products, paper towels, etc.
- Implementing a training programme for First Aid and the use of PPE
- Planning and monitoring for safe co-curricular and extra-curricular activities
- Ongoing planning and review for safe meetings that are essential to the operation of the school such as P/T meetings, Open Evenings, Parent Council meetings, Board of Management meetings, Student Council meetings, interview committees
- Maintaining records and seeking relevant approvals from BOM and trustees, as appropriate, on all significant Covid-related expenditure

PTR 0.5 adjustment

The following table shows the difference between a PTR of 19:1 and 18.5:1 (to nearest two decimal places) and this difference is converted into hours per week.

The additional hours would be used as additional support for schools to be deployed at the discretion of management in assisting with the return to school procedures and protocols.

Pupil numbers	0.5 PTR DIFFERENCE	Difference in hours per week
100	0.15 wte	3.3
200	0.28 wte	6.16
300	0.43 wte	9.46
400	0.57 wte	12.54
500	0.71 wte	15.62
600	0.85 wte	18.70
700	1.00 wte	22.00
800	1.13 wte	24.86
900	1.28 wte	28.16
1000	1.42 wte	31.24
1100	1.57 wte	34.54
1200	1.70 wte	37.40
1300	1.85 wte	40.70
1400	2.00 wte	44.00

2. An augmented Supervision allowance for each school to comprehend the increased supervision that will be warranted in schools at this time, an extra 33 hours per teacher for the year

Under the Haddington Road Agreement (Circular 0006/2014) S&S is compulsory for all teachers except those that opted out of the scheme. Also, it is not compulsory for casual substitutes.

Each wholetime equivalent teacher is required to deliver 43 hours per annum, otherwise it is pro rata. The maximum number of hours to be delivered is 3 hours per week except where a teacher agrees to do additional hours in any week. These hours are provided to cover teacher absences such as uncertified sick leave, the first day of force majeure and illness in family leave, approved school business and supervision of students before school, morning break time, lunchtime and immediately after school.

Typically, a teacher will do approximately 45 minutes of supervision per week (or 25 hours per annum) which is timetabled over the whole year. The time is usually made up of one morning break or before school cover or after school cover and one lunch break. However, the time requirement, and its breakdown, may vary from school to school depending on local circumstances. Nonetheless, supervision cannot be more than 50 minutes per week, as agreed in the original scheme, and there can be no increase in the amount of supervision delivered by any teacher as a result of the Haddington Road Agreement.

It has been agreed with the unions that supervision before or after school hours shall not normally be required from any teacher for more than fifteen minutes before classes begin or after classes end. This provision will prove problematic for many schools when they reopen in September. Aside from more supervision being required during the school day additional supervision will be required beyond the 15-minute limit in the mornings and after school to cater for staggered school bus arrivals and departures. Ideally, schools will need up to 60 minutes cover in the morning and, perhaps, something similar after school. In addition, supervision during the school day will need to be at least doubled during the morning break times and lunchtimes, even if there are staggered lunch breaks.

The nature of supervision in the upcoming school year will invariably be different than it has been previously. At present, supervision in the mornings and after school is minimal, monitoring behaviour and being a point of contact for students. From September, supervisors will be required at each entrance/exit door and in the corridors to ensure that students use the sanitising stations on entry to the building and that they follow protocols like social distancing, one-way systems etc. There will need to be multiple sanitising stations (e.g. minimum 5 and up to 10 in large schools) at each entrance door. Also, additional supervision will be required around lockers and bathrooms. Inevitably, on occasions some youngsters will arrive to school feeling ill and which require a level of immediate isolation and supervision. The current level of supervision is barely adequate to meet current needs and will not be sufficient to address the additional requirements for the reopening of schools and the requirements to keep the schools open.

An allocation of an extra 25 hours per teacher per annum to be deployed at the discretion of school management would approximately double existing supervision capacity. To cater for this and for the extra requirements before and after school, we would suggest that the increase should be in the order of an extra 33 hours per teacher per annum, which is the equivalent of one extra hour per teacher per week.

Current rates of payment for teachers and supervisors are set out below - Circular 0015/2015.

S&S rate for teachers

Status of Part-Time Teacher	Hourly Rate excluding holiday pay €	Value of Statutory Annual Leave Accumulated per Hour Worked €
Pre-1 January 2011 Entrant to Teaching	42.08	5.74
Entered teaching between 1 January 2011 & 31 January 2012	37.88	5.16
Entered teaching on or after 1 February 2012	28.59	3.90

The following are the hourly rates for external (non-teacher) supervisors:

Status of Supervisor	Hourly Rate excluding holiday pay €	Value of Statutory Annual Leave Accumulated per Hour Worked €
Employed prior to January 1st, 2011	21.31	1.70
Employed after 1st January 2011	19.18	1.53

Appendix 7v

Submission to Tusla on Corporate Plan 2021 to 2023

Background Information:	<p>The Corporate Plan is an important statement of intention by the Agency as to what will be central in the focus over the life of the plan. Much has been achieved in the organisation over the life of the current plan and now it is time to prepare for the next phase 2021-2023. Now is the time to set the over arching plan for the next three years.</p> <p>Having shared vision and mission for Tusla for the next three years is important and so too is having a plan that shows a journey of continuous improvement to the benefit of the children and families we serve. The new plan will set the priorities, goals, values and behaviours that we need to work towards and in a way that is transparent and easily understood and measured.</p> <p>Linked to our three headline priorities of Quality, Staff and Public Confidence are three areas of improvement in practice, culture and structure. While we have a lot of work underway already in these areas of focus we now need to underscore them in our plan for the coming years.</p> <p>As part of the process, ACCS were asked to submit a submission.</p>
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	18/08/2020

1. Introduction.

The current survey acknowledges many of the positive aspects of the work of Tusla. This submission is made to highlight some issues and opinions that cannot be communicated via the survey.

2. Educational Welfare Officer.

The role of the EWO, when it functions effectively, is invaluable in supporting schools retain vulnerable students. However, a number of issues prevent the service operating as envisaged. Lack of consistency is a significant issue; some schools have very good contact and interaction; others have little contact and there are schools who have been without any EWO service for the last three years. Every school needs access to an Educational Welfare Officer at all times but sometimes there is an undue delay in the appointment of replacement EWO's following area changes, promotion and statutory leave resulting in a patchy service. The lack of an Educational Welfare Officer impacts on a child's education/wellbeing and in turn has further implications around safety when the child is not attending school regularly without a valid reason.

Early intervention is crucial when attendance becomes a problem. When a school has exhausted its efforts, they should be able to expect the intervention and collaborative support of the EWO. Schools are required to report after 20 days; yet there is no follow up to that report. By the time there is any intervention, the problem has often become too serious to have a realistic chance of being resolved. Families and students need to have a sense that there is a school attendance system that is aware of absenteeism from an early stage. At very least we

would suggest that a family receive a 'cause of concern' letter from the EWO once a 20-day report has been received. A line of communication between school and EWO also needs to be established at this stage. Currently a number of schools report having difficulty in contacting an EWO.

3. Child Protection.

Undoubtedly, supporting children at risk is challenging for all involved and the work of Tusla personnel in continually striving to do so is acknowledged. Mandatory reporting aside, schools also play a central role in supporting students who are experiencing such difficulties. Effective communication between Tusla and school is essential in this regard and communication is an area that schools feel is currently lacking.

There would be concern about the communication from Tusla in relation to children under Child protection/welfare. Where a child at school is being supported by Tusla but the school has not been informed, this has serious implications for a child's wellbeing as the school doesn't have all the factors impacting on that child.

Lack of communication following referrals from schools to Tusla is a source of frustrations for schools. There is an understanding of the need for a certain level of confidentiality. However, basic communication as to whether the services have engaged with a student or indeed around the removal of a child from the service is an absolute necessity but currently this communication does not happen. Regular changes in personnel dealing with children also causes delays in progressing cases.

The remit of the school, the DLP and mandated persons is very clear yet when seeking advice/reporting a case, the DLP is sometimes expected to have information which would involve a level of investigation, which clearly is not the role of the DLP/ Mandated persons.

The role of the school in some aspects of case conferences also merits consideration. School personnel being asked to contribute to the 1 - 10 scoring system is quite an uncomfortable situation for the stakeholders and parents/guardians with whom a school has built a workable relationship can be impacted negatively. The process normally involves all the children - some of whom may not even be in the school. It may be more effective if the scoring was done directly TUSLA with a school feeding into the process only where relevant to a student of the school.

4. School Completion Programme.

The School Completion Programme has been one of the most effective initiatives to help students engage with school in a positive way. After school education support has enabled at risk students to successfully engage with their schoolwork; the broader range of activities have made school an enjoyable experience and a place where such students are happy to attend.

The work of the Local Committees has been phenomenal in supporting this work, but there are limitations to the work that a local committee can effectively support. Governance is now a key issue for all organisations and Local Committees need further support in this area. There is a need for consistency across all SCP programmes regarding employment terms and conditions, contracts for employees and rates of pay. The conditions of employment should not be individually negotiated. Contracts of employment need to be the same for those doing similar work in each programme. Each SCP programme should be able to draw upon centrally devised, standardised documentation. Without this, Local Committees are left vulnerable from a Governance perspective. Also, the constant revision of Governance and reissuing of guidelines in the last few years has been very frustrating but hasn't brought coherence to the system.

The balance between a necessary level of accountability without SCP becoming over-bureaucratic is also a challenge. The volume of paperwork associated with the programme has increased significantly, especially in relation to justifying the inclusion of an individual student in SCP. The flexibility around participation and determining the most effective range of interventions must primarily remain the function of the school.

Appendix 7vi

Initial Observations on Amended Arrangements for Examinations 2021

Background Information:	<p>Observations requested on “Exams 2021 Adjusted Arrangements” document which outlines the assessment adjustment arrangements.</p> <p>The work was completed jointly by the State Examinations Commission, the National Council for Curriculum and Assessment and the Department’s Inspectorate and reflects the assessment adjustments considered necessary in the context of the disruption that has or may occur for students taking the certificate examinations in 2021.</p> <p>The NCCA is creating an interactive version of this document which will allow teachers easy access to their own subjects.</p>
Link to Agreed Document:	<p>https://www.gov.ie/en/publication/63f6e-assessment-arrangements-for-junior-cycle-and-leaving-certificate-examinations-2021/</p>
Respondent Details:	<p>Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President</p>
Organisation:	<p>Association of Community and Comprehensive Schools (ACCS)</p>
Date of Response:	<p>11/08/2020</p>

The initial premise that “as schools have significant autonomy in determining how to sequence and pace learning for students in their schools, no centrally prescribed adjustment of the curriculum and courses of study would be effective for students” is accurate. Therefore, “incorporating adjustments to the certificate examinations in 2021” appears the fairest way of addressing the issue while protecting fairness for students and integrity of the examination process.

The challenge is to balance these changes across subjects while at the same time recognising the significant challenges faced by students and teachers since March 13 and the closure of schools. Without reduction in course content there must be confidence that the revised adjustments to the certificate examinations will allow students and teachers make strategic decisions regarding course content. The cramming of courses to ensure content is covered is not in the interest of students and is not a good model of learning. Therefore, the method of broadening choice questioning was also unsure students and teachers to make choices prior to exams to mitigate against such cramming. This is a recurring theme in a number of the observations provided here is initial observations.

If you face acknowledge the work in identifying the issues for students scheduled to fit examinations in 2021 and the proposed measures to alleviate the challenges students face in this most unusual of times. All observations provided should be viewed from this viewpoint and arrange it been constructive and helpful.

The Sciences

In general, they would appear to be a fair and appropriate. In all cases Questions which require specific knowledge from disparate areas of the course should be minimised. This is to avoid students being unable to answer questions because of one area/section of study that was not covered in sufficient detail given the challenges face this year.

Physics:

Important that any individual question in Section B does not require knowledge from very disparate sections to answer.

Chemistry:

Adjustments appropriate.

Applied Maths:

No change to paper but this is appropriate as choice is already wide. However as per physics, avoiding crossover to different areas should be minimised.

Biology:

Adjustments appropriate.

Ag. science:

Concern here about the course work where no adjustment has been proposed. This is the first cohort through of the new course. Titles for coursework were received in Late December. However, in-service was not provided until just before closure. The coursework is practical based requiring potentially farm visits, in particular for urban based schools. Because of the timing of in-service this could not have been done during 5th year for many schools. Consideration should be given to an adjusting the weighting of marks given to this or a movement to a less practical and more paper-based project.

Home Economics

Adjustments appropriate in relation to Coursework food studies & Textiles.

Written exam: Section A These questions tend to be narrow in what they ask but each question can often require knowledge across a wide spectrum. This is particularly so in HL and could affect the higher ability adversely. More choice needed here.

Art

Leaving Cert Art (including Craft)

Coursework:

Agree with the amendment that students will only be asked to research, develop and execute ONE artefact during the same length of coursework period as normal.

However, in past years students were asked to execute TWO artefacts from two different sections within the brief. Students had to select either an Imaginative Composition or Still Life in Section A and either a Craft or Design Question in Section B. As students will only be asked to complete ONE Artefact will they have the choice across all areas? Will they be able to choose to complete either an Imaginative Composition, Still Life, Craft Question or Design Question or will they be given the option from only one of the past sections (A or B)?

Would it be possible for the amended coursework workbook to be shared in advance of the coursework period so both students and teachers can become familiar with the new format they will be working towards?

Invigilated Practical Examination:

Agree with this amendment, it will not be assessed in 2021.

Written Examination:

In terms of the wording of the amendment I think it needs to be more explicit. My understanding is that they are being asked to answer a question from any two sections and then an additional question from any of the three sections – is that correct? For example, students can answer two questions from Art Appreciation and then one question from either of the remaining sections (Irish Art or European)?

Will the number of questions per section to choose from remain the same?

Taking into consideration the elimination of the Invigilated Practical Examination provides more time to cover Art History Topics, this is a fair amendment.

Junior Cycle Art

Coursework:

Agree with the amendment that students will only be asked to research, develop and execute ONE artefact during a shorter coursework period following on from CBA 2 (which are linked). Students normally have to complete work across all three stands (Art, Craft or Design), will they have the choice on which strand they wish to focus in the execution of their final artefact?

In the past students had to create ONE 3D piece either for CBA 1 or in the final SEC project, will this remain? In other words, do students have to complete a 3D piece for the final artefact if they did not produce one in CBA 1? I think that students should be able to choose whichever medium they wish across any of the three strands (Art, Craft or Design) for their final artefact that will be executed from research and development from their chosen theme from the brief issued.

Technical Subjects

Overall, the proposals look fair enough.

Construction Studies:

Welcome removing the experiments from the project and the removal of the compulsory question. I would like to see an additional 1/2 questions to give greater choice as there is no reduction in what is required of the students in the exam.

DCG:

Welcome the reduction in the requirement for the project. This portfolio is usually published first week of Sept so no good promising to publish it 4 weeks earlier. Would consider going much further and leave out the Solidworks altogether (I feel they have lost too much time and Solidworks is very time consuming so omitting that would help greatly) The rest of the portfolio could be done as before.

In the written exam Section A, 4 questions do 3 and Section B, 3 questions do 2 does not give any additional choice. The course is already huge and as both of these sections are core, students may not be able to attempt the required number of questions in these two sections. Section C, welcome the reduction from 2/5 to 1/5 questions which will give extra time to the students in the exam which would be useless if there are sections they have not covered in the "core". Section A & B need additional questions to choose from.

Engineering:

Removing student preparation for the practical exam saves class time however, will teachers to asked to complete this work? Consider reducing the criteria that the artefact has to meet. (generally it's 3 or even 4 criteria) Reduce the criteria to 2.

In the exam students must complete the same number of questions in return for having greater open choice. There needs to be additional questions to choose from, 6/9 is not enough. Consider 5/9 or 6/11 or 12. Ordinary level choice could also be improved.

Technology:

Reduction in questions required will allow extra time, would like additional questions to choose from to ensure students have something to answer. Some reservations about practical work.

JC Technical Graphics:

Reduction of 1 question required will allow additional time for students, proposal looks OK.

JC Metalwork:

Slight reduction in Section A of the exam gives only slight help and additional questions to choose from are required. Arrangements for OL exam not present.

Project, hopefully it will be simplified. Suggest reducing the number of parts to be made.

English and History

In both English and History the approach is consistent with the overall direct with more question options rather than an actual reduction in amount of curriculum to be covered. Based on what is proposed in both subjects it is doable but demanding. Open to criticism on the basis it is an over expectation. If school is disrupted again this year the proposals may not be achievable.

French

Higher:

Oral:

Where the adjustment seems fair. However, it may promote a return to rote learning and cramming on the themes / topics rather than promoting flexible competence to apply language broadly.

Agree no change needed on Listening or Written Examination Sect. A.

Sect. B increased choice is welcome and the rebalancing of marks is fair (though email and formal letter is not a choice that sees high marks and pupils now steer clear this really only a choice from three).

Ordinary:

Oral:

Retention of document good. The 'specialisation' of three themes may scare some pupils. Depends on balance of marks for theme Qs against general conversation.

No need for adjustment on Listening Comprehension.

Written:

Could an additional comprehension be questioned and responded in English?

Increased choice fair

Mathematics

The main change is the introduction of choice in both papers. The curriculum is very long and the completion of all topics to the required depth is very questionable. To ensure the introduction of options the range of questions must reflect the breath of the course and be discrete in terms of curricular content. Significant benefit would be derived from sample papers displaying the structure and intended discrete nature of questions.

Sample Papers

The decision not to publish sample papers to reflect the proposed amendments should be reconsider as it will provide greater clarity to students.

Appendix 7vii

Observations on Clarification on Face Coverings in Schools.

Background Information:	Ahead of the Reopening of Post Primary Schools, the Department of Education and Skills requested observations on the document " <i>Clarification on face coverings in schools</i> ".
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	02/09/2020

ACCS has always promoted the best opportunities for our schools, pupils and staff. At this time of uncertainty we remain clear and focused that we must provide the best protection for all of our school community.

We acknowledge the resources that the state has provided to enable schools to support the national recovery by reopening schools safely. We should not expose our pupils or staff to anything less than the best protection from and risk minimisation to Covid-19. We recommend adherence to the WHO advice that cloth face coverings represents a higher level of protection and risk minimisation for transmission of Covid-19 in our schools thus supporting the national recovery.

There are three areas under which we offer observations on the draft Clarification on Face Coverings in Schools.

1. The requirement that teachers, staff and students attending post primary schools wear a face covering
2. Medical certification
3. Maintaining 2m physical distance from staff or students where a face covering should not be worn

1. The requirement to wear a face covering

The draft document does provide clarity that a face covering of any type may be worn once this face covering covers the person's nose and mouth. This is, however, a departure from the guidance provided in the Response Plan where the emphasis is clearly on face masks and answers given at stakeholder meetings by Department personnel. The Minister in a prime-time interview has also stated that it is mandatory to wear face masks in secondary schools.

There appears to be consensus from the medical experts that face masks provide a greater degree of protection and as a minimum this should be stated clearly in the clarification.

2. Medical Certification

We propose the following wording to ensure absolute clarity on the requirement to provide medical certification:

A medical certificate must be provided by any person who claims that they cannot wear a face covering of any type. In circumstances where a medical certificate, certifying the person cannot wear a face covering of any kind, is not provided the person can be refused entry to school.

3. Physical Distancing

The clarification states "when a physical distance of 2m from other staff or students cannot be maintained although certain exemptions from this are set out". When speaking of the exemptions is the exemption from wearing the face covering only or is there an exemption from maintaining physical distancing of 2m also.

If the medical certification applies to the exceptional cases only this may not be a very significant problem in schools. However, if certification simply stating a medical condition that may imply difficulty with wearing any kind of face covering is acceptable we run the risk of the significant number of 'non-consenters' exploiting a loophole.

It would be beneficial if the public health guidance included schools in the indoor settings where face coverings are required.

Two additional areas that may be included in an FAQ or similar are:

- Are teachers who can physically distance 2m from students in their class exempt from wearing a face covering.
- What is the requirement on face coverings when participating in physical activity? Does the 2m physical distancing apply or the return to sport protocols?

Appendix 7viii

Observations on the Students at Very High Risk Document.

Background Information:	Ahead of the Reopening of Post Primary Schools, the Department of Education and Skills requested observations on the document " <i>Continuity of schooling: Supporting post primary students who are at very high risk to COVID-19</i> ".
Link to Agreed Document:	https://www.gov.ie/en/publication/775fd-continuity-of-schooling-supporting-post-primary-students-who-are-at-very-high-risk-to-covid-19/
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	02/09/2020

The document is clear and helpful. The inclusion of the line on managing expectations early in the document is helpful as is the phrase "as far as possible" which brings a degree of reality to the document.

Ongoing, two-way home-school communication and collaboration, including clear expectations about the level of support that is expected of parents/guardians and the supports the school will/can put in place to support parents in this role and to facilitate continuous learning for these students, should be in place.

There two areas of possible concern

1. The mechanics of the local Ed centre connecting the dots re which teachers are available etc. There is no reference to LEC and teachers working with students from other schools in CL 49/20 in the alternative working arrangements and no steps set out in this document on how they establish the list.
2. The role of the SNA is absent from the doc and many of these children with physical needs will have had support from SNA in schools. For example the SNA assisting with skills required for use of devices/practical classes etc. The subjects are set out with possible strategies for engaging students at home but the onus is on the teacher to support remotely with no ref to the role of the SNA.

There are two other points that stand out

- The SPHE teacher/tutor/ and RE teacher have a big role to play in the "connectedness" piece and the wellbeing piece and will have to be able to deliver synchronously so that the student who is remote has some sense of class time/identity/connectivity etc. with their peers. This will be necessary from the outset and teachers will need support in this role.
- Assessment and feedback will also be key to the learning experience for the remote learner and for the parent/guardian supporting the remote learner. The ongoing two-way communication will be essential in this regard.

Appendix 7ix

Observations on Guidance on Continuity of Schooling: September – December 2020 for Post-primary Schools.

Background Information:	The Department of Education and Skills requested observations on the document <i>“Guidance on Continuity of Schooling: September – December 2020 for post-primary schools”</i> . This document will provide guidance for Post Primary Schools in the event of a partial/full school closure.
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	21/09/2020

This is a very good document if a little light touch! It appears unusual that this document makes no reference to the use of mobile phones by students for scanning homework and all the other activities for which students choose to use their phones. Already in some schools, students are being asked to place their phones on their desks for use at various times during class for copying from board, research etc. While devices are mentioned a direct reference to mobiles might be considered.

The document hides behind this “device” label and does not acknowledge the reality for so many students. There could be reference to the importance of developing skills in relation to the mobiles in the 2nd section. Equity and devices – for many of our children this is not a device divide, rather a values divide as they have chosen to pay for top of the range phones rather than buy laptops etc.

We have schools, particularly DEIS schools in areas of high social disadvantage, who have recognised that what happened regarding connectivity between March and June of this year cannot be allowed to happen again. They are seeking ways to ensure each student has access to a device. This is placing significant financial pressure on schools. Where school devices are ‘loaned out’ to students firewall and encryption software is required for security reasons. Additional funding will be required by schools to meet this requirement.

Section 4 on the requirements is very useful and will be so for school management in moving staff along the upskilling spectrum range. The first paragraph stating, clearly that it is no longer sufficient for staff to issue work to students, is very important. The process must become a two way one – even a three way one.

In the event a school closure is necessary we ask it be explored as a closure for students in the initial phase to allow/ensure teachers work from school and avail of the facilities in school and work in a collaborative manner.

If teachers are required to work remotely the school really need to provide the devices they use to ensure consistency but more importantly security. Finance is required to meet this objective.

The introduction of high-speed broadband for schools is valued. However, the speeds in schools, particularly those who joined the scheme in 2010 with 100mb, need to be upgraded as a matter of urgency to ensure they can provide the platform for schools to operate in an era of much increased demand for band width. Lack of investment in this basic infrastructure may well undermine the ambitions of the principles outline in the document.

Appendix 7x

ACCS Observations on the New Test of English Literacy Skills – Post Primary – October 2020.

Background Information:

A new test of English literacy is being made available to all post-primary schools for use with First Year students. The PPAD-E is an assessment of English literacy skills that has been developed by the National Educational Psychological Service (NEPS) for post primary schools in Ireland and recently standardised in collaboration with the Educational Research Centre (ERC).

The PPAD-E is intended to be used by teachers from First Year intake across the age-range in post-primary schools. It is a screening and diagnostic tool that assess literacy skills consisting of five subtests and takes approximately 60-70 minutes to administer.

- Word reading
- Spelling
- Reading comprehension
- Reading speed
- Writing samples

NEPS psychologists, through their ongoing work in schools, are aware that schools want a tool which is cost-effective, easy to administer and score, and can be used for a range of purposes. Therefore, the PPAD-E can be largely group administered, except for the word reading test, which needs to be individually administered. The tests have been developed in parallel (yellow and blue) versions, to allow for test/retest data. The test is:

- culturally appropriate and tailored to the Irish context
- designed for use by teachers
- accompanied by tools and materials that enable test administration, scoring and interpretation of test results for individual students
- linked to evidence-based interventions
- suitable for considering eligibility for an exemption from Irish
- helpful for screening for difficulties (particularly at first year intake)
- useful in diagnostic assessment, monitoring and evaluating progress
- helpful in providing data for RACE/DARE, and
- useful in establishing and reviewing standards.

Due to the exceptional circumstances caused by Covid 19, the assessment tool and all the materials needed to administer, score and interpret the test, including the on-line training modules are being made available for FREE to all post-primary schools in October/ November 2020.

Thoughts or suggestions on how to best introduce this assessment to schools are welcomed as well as feedback about the sample information sheets that have been developed for schools to introduce the PPAD-E to teachers, parents and students.

Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	13/10/2020

This is a very welcome development in this unique time, and it is great to see a test developed specifically for the Irish context. All other tests available for second level currently are developed in other countries and applied in the Irish context. While this is useful for international comparison it is very useful to have a literacy, test aimed specifically at the Irish context.

The pack will be a good resource for school teams to pinpoint both strengths and needs which will enable efficient and targeted support. Developing early indicators for the application of RACE/DARE is also important.

It is also welcome that these tests are developed to be administered by teachers because the classroom teacher is often removed from an understanding of the testing process.

It is not clear from the letter whether these tests will or can be done electronically. It does indicate that the results can be collated electronically.

The individual administration of the spelling test will be time consuming and will require some planning to carry it out.

Having the materials in one pack is useful and the timing, post midterm is important as schools will be in a good position at this point to administer testing in order to get information on the ranges of ability in the first year cohort.

Appendix 7xi

Supporting Students with Autism: Good Practice Guidelines for Schools.

Background Information:	<p>In 2016, the National Council for Special Education's policy advice, Supporting Students with Autism Spectrum Disorder in schools, set out a number of recommendations to improve education provision for children with Autism.</p> <p>To support the implementation of a number of recommendations in this report the Department convened a working group to develop Inter Agency Good Practice Guidelines for Schools on Supporting Students with Autism.</p> <p>Membership of the group includes the Inspectorate, the NCSE, the Middletown Centre for Autism and NEPS.</p> <p>The guidance and resources will be made available to teachers, school staff and school leaders to draw on when supporting students with autism across mainstream and special education settings. Separately, indicators of effective practice are set out in a companion document which schools may use as a reflective exercise to review aspects of their provision for students with autism.</p> <ul style="list-style-type: none">• It is intended that this Guide will be available online enabling school staff to access specific sections/topics as needed• Webinars will be developed to introduce the Guide to all relevant services and to schools• An Implementation Project will be established to trial the resources and strategies in a group of schools to inform and support the implementation of the Guidelines• An implementation plan will be developed to support schools to implement the guidance and resources over the next number of years• Guide will be shared with bodies involved in initial teacher education <p>Request for ACCS to provide feedback/comments.</p>
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	12/11/2020

<p>What did you find helpful about these guidelines?</p>	<p>Undoubtedly, the guidelines provide a detailed and comprehensive insight into all aspects of Autism. It creates a very clear picture of how students with autism experience school, learning and life. It clearly outlines the factors that influence and impact on their learning and sets out a very wide range of possible interventions and resources to support students in the school setting.</p>
<p>What if any additional resources might strengthen the guidelines (please reference specific section/page no.)</p>	<p>The Guidelines are aimed at supporting school personnel to plan effectively and need to be as user friendly as possible. Yet the language of the guidelines is quite technical and theoretical. The removal of some of the sections describing theory and some of the references to further reading may be worth consideration. (e.g. page 26, Step 2, paragraph 4)</p> <p>Table 1, pg 32, Table 2 pg 51 – are these intended as a ‘menu’ from which schools can select – if so this needs to be stated.</p>
<p>Is there any aspect of the text of the guidelines that you think needs to be changed? If so can you note the page number and suggest alternative language.</p>	<ol style="list-style-type: none"> 1. Obviously, the guidelines incorporate planning in the full range of settings from special schools to mainstream, primary and post-primary. Acknowledging the difficulty of encapsulating all in one document, the lack of distinction between the settings makes using the guidelines more difficult within a mainstream setting. Many of the tools, approaches and resources are obviously more appropriate in a setting where the primary focus is provision for students with autism. However, if being used as a guide to support planning for a small number of students in a mainstream post-primary setting, it is more difficult to identify the most relevant sections. At a time when all schools are being encouraged to adapt more inclusive provision, it is important that the planning for such provision does not appear to be overwhelming. 2. The scope of the Student Support Plan appears to be very broad for a mainstream setting. For example, page 70 (community activity, all adults involved in student’s life and page 122 (Testing tools). While schools undoubtedly consult in an on-going manner with parents/guardians and other professionals, the limits of what is possible in a school setting must also be acknowledged. The primary focus must remain provision within the school setting.
<p>Are there any specific improvements to the content and format that will enhance schools’ use of this Guide?</p>	<p>Overall, the 3 documents seem confusing and somewhat daunting. Within the Guidelines there seems to be 2 sections: Section 1 -158 and the section ‘A Closer Look’. Within each section there are combinations of explanatory text, Tables, Resource Boxes, and references to further reading. Added to this there are the Indicators of Effective Practice and a further User Guide. Looking through the lens of a school planning for students with autism, it is difficult to follow the process. Might it be clearer if Guidelines were set out in sections clearly distinguishing between text, planning tools and resources sections. This could incorporate the Indicators of Effective Practice into the guidelines. The current Indicators of Effective Practice could be replaced with a ‘Toolkit for Schools’ document as was done with the Toolkit to Support the Special Education Teacher Allocation Model.</p> <p>The quantity of paperwork in relation to planning seems quite intense. Planning for students with autism doesn’t sit in isolation; it is one element of a whole school planning process which incorporates planning for a range of students, a range of programmes and overall school development. The Guidelines need to avoid adding unnecessarily to school workload. It may be worth a sample ‘walkthrough’ a planning process as outlined in the Guidelines, A Closer Look and Indicators with a view to what paperwork it entails. Even the completion of Appendix 8a and 8b (pages 55/56), which is only a very small portion of the planning process, seems overly intense and does not take into consideration existing school planning processes.</p>

Additional comments

Observations

1. Some fundamental issues must be raised. Planning for inclusion is now assumed as an integral part of education. Yet there is still wide variance in what is classed as inclusion across schools; with a proportion of schools still of the view that provision for students with additional needs is best done elsewhere. If there is a determination to have an inclusive system, perhaps the principle that students with special educational needs should be educated alongside their peers needs to be reviewed to state that students with special educational needs should have an expectation that they can be educated alongside their siblings and peers. The Guidelines set out ambitious targets for the inclusion of students with Autism. If this is to be more than tokenistic the inclusive school must become the local school, providing mainstream or special class supports.
2. The documents are very detailed in the processes that should be followed in identifying needs, planning, provision and review. There is an emphasis on a whole-school approach. Provision for students with autism sits alongside provision for other students with a range of special educational needs. The ad-hoc nature of SEN planning cannot be sustained. Autism and SEN planning requires structure, expertise and consistency. There must be someone with a high level of knowledge and expertise to oversee planning, guide and inform the subject teachers, review and liaise with all stakeholders. The urgency for the allocation of a SENCO cannot be over-emphasised. Without such a structure, these and other SEN guidelines will remain aspirational.
3. All teachers need an awareness of autism and special educational needs. Newly qualified teachers should be coming to schools with the capacity to engage meaningfully with such students. To this end Initial Teacher Education needs to prepare students for what is the reality of today's classrooms. Undergraduate programmes need to accommodate this training as an integral part of training. Teachers currently working in schools need access to upskilling programmes in autism, to understand and accommodate students in a meaningful way.
4. The role of the SNA has the potential to be developed in relation to working with students with autism. The development of life skills and independent living skills is referenced throughout this document. The SNA could have a central role in this area. The new professional upskilling programme for SNA's provides an opportunity to provide such training.
5. The guidelines frequently reference interaction between schools, healthcare professionals, NEPS and NCSE personnel. The structures and personnel to allow this interaction to happen consistently and at an adequate level must be put in place. There must be an expectation that such services will exist, be available in a timely manner, not sporadic, or dependant on geographical location. The further development of the School Inclusion Model is to be welcomed in this regard.

Appendix 7xii

Observations Regarding the SSPS.

Background Information:	<p>In developing this model of inspection, the Department of Education and Skills have engaged with a range of key stakeholders including representatives of parent and student organisations, teacher unions, school management organisations, the Office of the Ombudsman for Children and School Governance section of the Department of Education. The Department have also worked closely with a number of schools in trialling the visits.</p> <p>The Department have taken this approach to the development of these visits in order to ensure that they arrived at the most practicable way of conducting the visits while fulfilling their responsibilities under the Memorandum of Understanding between the Department of Education and the Health and Safety Authority (HSA). The Inspectorate is conscious of the efforts that stakeholders and schools have made to contribute to the developmental work to date and we are most grateful for this cooperation. As a result of the trial visits and the engagement with stakeholders so far, a number of adjustments were made to the visits.</p> <p>Feedback is requested on the Guide to Supporting the Safe Provision of Schooling.</p>
Link to Agreed Document:	https://www.education.ie/en/Publications/Inspection-Reports-Publications/Evaluation-Reports-Guidelines/a-guide-to-supporting-the-safe-provision-of-schooling-2021.pdf
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	21/09/2020

The guidance and format is very clear.

Most recent figures endorse impact of measures and level of risk minimisation by schools. While describing the Inspection as being supportive, the publication of the Report makes this much more a compliance check. In light of this our first observation is that prior to publication will school management have the opportunity to address any shortcomings in a similar manner as applies in the CPSI Inspection?

Can inspectors check for availability of social space for students - indoors and outside? Checking re social distancing outside is a very complex dynamic and the ground needs to be better prepared with students and parents to educate re need for mask outside if in very close proximity to others at break.

Does Inspector discuss:

- Disengaged learners?
- Curriculum concerns due to impact of COVID?

Is there an opportunity to engage with students?

The feedback from schools engaged in the Pilot has been positive. The requirement to publish a compliance report may change this dynamic.

Appendix 7xiii

ACCS Observations on SEC Presentation on State Examination 2021.

Background Information:	<p>As discussed at the Advisory Group meeting on 25th November, it is the firm intention of the Department and the Minister to hold the 2021 examinations with appropriate contingency and public health measures in place. At this meeting, the Minister requested that all members of the Advisory Group share their expertise and experience in relation to these arrangements.</p> <p>The group received a presentation from the State Examinations Commission on possible arrangements for various components of the 2021 examinations in the context of Covid-19. There was a discussion of how these challenges can be met. These discussions will resume when the group next meets in January 2021.</p> <p>The group was also advised of clarifications to the assessment arrangements for the 2021 state examinations which originally issued to schools in August. These clarifications, and a small number of adjustments, take account of comments received from stakeholders and will be sent to schools shortly.</p> <p>The group was also advised of additional flexibility in the arrangements for the completion of coursework where such measures are required to support students due to Covid-19. Details of these arrangements will shortly be issued to schools by the SEC.</p>
Link to Progress Update:	https://www.education.ie/en/Press-Events/Press-Releases/2021-press-releases/PR21-02-17.html
Respondent Details:	Mr. John Irwin, General Secretary Mr. Paul Fiorentini, President
Organisation:	Association of Community and Comprehensive Schools (ACCS)
Date of Response:	17/12/2020

Initial Observations

ACCS acknowledges the significant work currently undertaken by the State Examinations Commission in preparation for 2021 and the time and consideration that has been given to exploring the challenges in delivering the examination process this year.

“ensuring that the conventional Leaving Certificate Examinations, to include all assessment components, can be held in 2021”. While mindful of public health requirements, the commitment to include **all assessment components** is welcome and is essential to ensure equity for all learners and to recognise as many modes of learning as possible.

“Protecting the health of candidates, superintendents, attendants and others involved in examinations delivery in schools...’ must be paramount. Given that the completion of the state examinations is a *national priority*, consideration must be given to prioritise all those involved in delivering the examinations in the national vaccination programme for Covid-19. While significant pressures will be placed on initial access to the vaccine, we must meet our responsibility to the students sitting the examinations, particularly Leaving Certificate students.

Central to students and schools is certainty and clarity. It is important that any potential changes are flagged well in advance. When considering the use of IT/digital media in examinations the stated commitment to include all assessment components must be central to

considerations. Where it becomes a choice to employ IT/digital media to facilitate identified components rather than exclude the components, it is imperative students are afforded the opportunity to demonstrate their learning/and feel competent in the necessary digital skills. In fact, many of this cohort of students and staff have upskilled considerably and have a greater familiarity of the functionality of various digital platforms since schools closed last March 2020. For many schools, the online assessment approaches are central to the learning experience now.

One example of where this has occurred is the RIAM which has conducted recent assessments by accepting recorded performances. In a school setting this is very achievable, and the validity of the recording can be authenticated by the school. It serves two purposes, i) there is no requirement for examiners to attend schools in person ii) It is also considerate to students by relieving the stress of 'live' performance. Is the 'live' element an essential component of the assessment? If so, why?

Where oral examinations are concerned the Local Education Centres could provide a potential network for examiners to ensure they have the professional space and the infrastructure and support in order to engage securely and confidently with ICT/digital media platforms. While face to face engagement would be preferable, investigation of some form of virtual engagement is preferable to jettisoning the assessment component fully.

It is challenging to recruit the required personnel. Consideration should be given to:

- Incentivising engagement as an examiner with the state examinations.
- Encouraging all newly qualified teachers to engage in the SEC process, and the learning this role affords, for a period following qualification.

Incentivising engagement as examiners is not a new concept as it was mooted that this engagement would meet future requirements of teachers to meet Teaching Council registration requirements to complete relevant CPD annually. It may be necessary to consider enhancing incentives such as recognition of service in some way for teachers who commit to significant number of years engagement.

The second option is not an immediate solution to recruitment issues but could be considered. Admittedly, it places significant pressures on the SEC to upskill and train newly qualified teachers.

It appears agreed among all stakeholders that the Leaving Certificate should be prioritised over the Junior Cycle. The option of schools hosting both the Leaving Certificate and Junior Cycle written examinations at the same time will be dependent on available space and examination personnel. With regard to available space, schools should be audited without delay to establish the capacity to meet requirements of hosting both examinations including the RACE centres required. In the case of personnel further consideration could be given to teachers not currently engaged by the SEC being asked to consider invigilating Junior Cycle centres within their own schools.

In the event that it is not possible to schedule the full programme of Junior Cycle examinations in June alongside Leaving Certificate a blend or mix of approaches may be considered. Supporting the national Literacy and Numeracy Strategy, Junior Cycle students could be asked to sit examinations in English, Irish and Mathematics in the final days of the last school term in late May early June. Alternative school-based assessments may, in these exceptional times, be considered for the other subject areas. As with this year, a national certificate of completion of the Junior Cycle could be considered.

ACCS acknowledges the greater flexibility provided in the area of coursework and fully supports the proposal that schools may seek extensions to closing dates for coursework for both individual students and class groupings based on the local context. It is important that this does not result in congestion through the month of May.

In the event that the SEC finds it is necessary to schedule examination events outside of normal school timeframe, e.g. first week of Easter holidays, after school, weekends etc. it would be important that these are resourced similarly to the LC2020 examinations which took place in November. This approach may be necessary given the significant challenges currently for schools in managing visitors and the shortage of suitable additional space in schools.

Returning to the questions posed:

What is the optimal model for the timing and delivery of the oral and practical tests?

Where possible the optimal model for timing and delivery of the oral and practical tests is what currently exists. However, this may not be possible. The proposal to bring the Irish orals forward to prior to Easter could be considered but needs to be notified to schools as early as possible.

Face to face orals are preferable but, in the event they are not feasible, the use of ICT and digital platforms should be considered as opposed

to not having the component assessed. As previously stated, the network of Education Centres could potentially be used by examiners providing necessary IT, infrastructure and onsite technical support. Guidance would need to issue to schools as early as possible to ensure familiarity for students and staff with the process and to ensure that technical issues could be addressed early. School management would require additional resourcing to facilitate the process.

We are unsure of the challenges around some of the practical examinations and why more time would be required in technical rooms. Further clarity on this area would be appreciated. Assessment of some practical elements may be conducive to recording or the use of digital media. Again, this would be preferable to not assessing the component.

What about the examination events scheduled during May?

Where feasible these elements should proceed. It is important that students of the Leaving Certificate 2021 have the opportunity to demonstrate their learning through a variety of assessment components. While contending that the skills have been captured through coursework and the May element is not entirely essential, removing this element skews the assessment more toward the theoretical and disadvantages the more practically skilled learners who have chosen subjects because of the practical assessment components.

What are the options for delivering the Leaving Certificate and Junior Cycle written examinations?

This is challenging in the light of current restrictions and potential SEC recruitment issues. All stakeholders appear to agree that the Leaving Certificate be prioritised. Please see earlier observations regarding the Junior Cycle and sitting of some examinations in the latter part of the final term supporting national literacy and numeracy strategies and in this regard, an approach which is aligned to assessment norms across Europe.

For contingency reasons, should consideration be given to starting the written examinations in May? What about the impact on LCA?

Please refer to previous observations regarding sitting some Junior Cycle examinations in late May/early June. Scheduling written examinations in May could cause considerable potential for increased stress and anxiety for Leaving Certificate students. This option is inadvisable, and it is more appropriate the format for written papers remains as close as possible to the conventional format for Leaving Certificate.

Consideration should be given to marking the tasks in-house to avoid the movement of teachers across schools. Interviews could be conducted in-house by teachers with LCA experience who are not delivering LCA to this year group. Again, this could be managed via a digital platform.

The teacher could effectively mark the practical element of the examinations for their own group and in LCA, the teachers already scaffold much of the practical work. The teachers would have to be paid an appropriate fee for this work. There would be an opportunity for authentication of the marking by an outside examiner at a later date.

The life skills gained in the participation in task interviews are significant for LCA students. These should be retained if at all possible. The Year 2 cohort LC 2021 did not complete the scheduled ones in May. They completed one in February and have one left to complete this year. Would it be possible to consider the LCVP recorded interview model for the LCA students also? Could orals be pre recorded in a similar way. This model would reduce the number of visitors to schools. LCA 1 group will also have to be considered in this mix.

Can the system guarantee the required numbers of personnel to support the delivery of the examinations in 2021? If not, what are the priorities?

As an educational partner ACCS will promote the engagement of teachers in the State Examinations process. As previously suggested, it may be worth considering Junior Cycle examinations being invigilated by teachers from within their own schools. Where the required numbers of personnel are not available to support delivery of examinations in 2021, it is essential that the Leaving Certificate/Leaving Certificate Applied examinations are prioritised.

The date for the issue of the results of LC may be later –how will this integrate with HE/FE?

While stating this is really an issue for the HE/FE providers we acknowledge this may have a significant impact on students as well. The HE/FE providers were very supportive and accommodating in last year's process and it would be beneficial they are part of the continuing dialogue.

The bigger issue of decoupling the Leaving Certificate as sole determinant to entry to the majority of college places is a far wider debate that will not be resolved in this discussion.