

Appendix 8

(i) Briefing Statement to the Department of Education on the Proposed New Model of Allocating Special Needs Assistants to Mainstream Schools from 2020/21

ACCS appreciates the opportunity to consult on this new model of allocating SNA's to schools. The benefit of not making detailed applications annually or schools not experiencing the frustration of not being able to access assessments is acknowledged. However, we are stating in the strongest terms that we believe that this model is not ready for introduction in September 2020.

We have a number of concerns:

1. The Pilot Project will not be completed until the end of the year. The purpose of the pilot is surely to give an opportunity to reflect, evaluate and use the learning to inform the roll-out of the model. This cannot happen within the current timeframe. Also, the pilot schools have access to all the necessary support services, personnel and training for the successful implementation of the model. Can this level of support be replicated nationally by September 2020? Can the structures be put in place within the timeframe? The Guidelines refer to the proposed expansion of NEPS and NCSE's new Regional Structure. Schools must have a realistic expectation that the supports needed will exist. Currently many schools are frustrated at the lack of availability of supports from outside agencies. To add another new structure to be implemented by schools who do not have adequate access to external support structures to effectively manage existing SEN structures is not realistic.
2. The guidelines refer to school autonomy in relation to the deployment of SNA's based on identified care needs. They set out a detailed process around identifying need, assessments, processes, checklists, consultation, implementation, evaluation, flexibility. But there is no reference to who will lead this process, other than references to the responsibility of the Principal. SEN provision in all its facets is now a very significant part of most schools. And schools want to develop structures that will enable students get the best possible outcomes from the support they receive. But that requires every school to have a co-ordinator of SEN, a SENCO with the expertise to build and lead an SEN team who can develop whole school provision in line with national policy. Currently schools are struggling to implement SEN provision in the way envisaged; SEN is dependent on too many untrained teachers and ad hoc planning. For years the management bodies have sought the allocation of a SENCO, based on the Programme Co-ordinator model. Ironically, SEN provision is broader in numbers and requirements than most of the programmes that have been necessary to have dedicated co-ordination. Another layer around SNA deployment cannot be managed by schools without the allocation of a dedicated SENCO.
3. There is a need for adequate information sessions/CPD and the timeframe is now too short for introduction in 2020. A briefing session for Principals in January 2020 is not adequate. Principals cannot be expected to 'head' the introduction of this model. They neither have the expertise or time capacity so do so. The information sessions/CPD must be directed to the SEN personnel who will lead the process (SENCO). SEN departments need to have a full understanding of the model if it is to be implemented and this must be done through NCSE CPD/Information sessions. Policy change at this level cannot be left to schools to work it out for themselves. The only way to successfully introduce change as significant as this is to work collaboratively with those who will implement that change at school level. SEN co-ordinators must be informed and feel that the structures are in place to support them in the implementation of the new model.
4. CPD is also necessary for existing SNA's to inform them of their roles and direct their practice.
5. The IR issues must be considered. Teachers' role in planning and the development of individual pupil plans is already a contentious issue. Currently SEN teachers are being prevented from taking up co-ordination roles in a voluntary capacity by trade unions. The additional requirements around SNA allocation can only increase existing problems. The Post of Responsibility allocation cannot always be the solution. POR cannot be advertised or appointments made to meet specific needs and SEN provision needs a suitably qualified person with a genuine interest in the area. Also, the IR issues with SNA trade unions must be considered.
6. The Appeal process must be completed and fully in place at the time of the roll-out of the model.
7. ACCS would also have some concerns around the initial allocation of front-loaded SNA's and how this is to be calculated. Many of our schools cater for a high percentage of students with additional needs. Under the current system a number of our schools in the most disadvantaged areas are struggling to get an adequate number of SNA' because parents cannot afford the necessary assessments and access to psychological services is not sufficient. If, as the SET general allocation model was, the allocation is based on existing SNA

numbers, these schools stand to be further disadvantaged. Schools with the capacity to access private assessments have secured greater SNA allocations than schools catering for a much higher number of students with very real additional care needs. This issue needs serious consideration before the introduction of the new model.

8. A mechanism to manage allocations to new greenfield schools and schools with rapidly growing enrolments needs to be worked out before the introduction of a new model.

We believe that this new model cannot be effectively introduced to schools in September 2020 and that it should be delayed for a year.

Appendix 8

(ii) Submission re Draft Guidelines on the use of Reduced Timetable/Reduced Day in Schools

ACCS, the Association of Community and Comprehensive Schools welcomes the opportunity to comment on the above draft guidelines. All schools in the community and comprehensive sector are fully committed to inclusion and this is reflected in the enrolment policy and practice of each school. Consequently, community and comprehensive schools have vast experience of working with students with wide and varying abilities, needs and behaviours. And, it is in the context of this experience that our observations are made re these Draft Guidelines.

The guidelines will be a useful guide for a school where a reduced timetable must be considered. The general principle that a reduced timetable is considered only after other interventions have failed would be recognised by all schools. But, we believe that the guidelines must also recognise that a reduced timetable/reduced day is at times the only option left to a school in their efforts to retain and support a student's continued attendance in school. To work, the guidelines, while rightly recognising the right of a student to a full education, must also be sufficiently comprehensive in scope to allow schools to use them in the full range of circumstances that may necessitate reduced timetable/reduced day. If the guidelines are too limited in scope, they may inadvertently lead to an increase in the number of permanent exclusions, something that no school wants or seeks to advocate.

Observations re the Draft Guidelines:

- **Introduction, Paragraph 1:**

Suggest the removal of the word 'absolutely' necessary and to rewrite as 'to ensure that the use of reduced timetables/reduced days are limited to only those exceptional circumstances where it is necessary and, ...'

This would be in keeping with the language used throughout the remainder of the guidelines.

- **Paragraph 3 'The guidelines are underpinned...':**

Strongly suggest that it is necessary to remove the words 'or used as a behavioural management tool'.

This is not a realistic limitation to impose on schools. In any school there can be an individual student who presents with extreme behaviour difficulties, who, even with the enhanced supports provided through DEIS or SEN allocations, fails, for a period of time to cope in school. Allowing such a student access to a slightly reduced timetable/day for a little while can often give the disaffected student the opportunity to get back on track and return to a full school day. We note that these draft guidelines are closely aligned in wording to those of the UK and would suggest that the criteria used in the UK guidelines might be considered to allow the 'disaffected' student to be included. (Please see observations for Section 3 Post Primary)

- **Section 3 Post Primary:**

Paragraph 2:

Might there be merit, as mentioned above, in setting out the circumstances for consideration of a reduced timetable more clearly (as done in the UK document (www.servicestoschools.org.uk 'Guidance for Schools on the use of Reduced Timetables') possibly along such lines as:

'Reduced timetables/reduced days should only be considered in very limited circumstances such as, for example:

- Assisting a student to return to a school where they have been experiencing an absence due to a medical or mental health related condition.
- As part of a planned reintegration into school following an extended period out of school e.g. following an exclusion, non attendance, school refusal etc.
- To support a student who has become disaffected to regain success as part of an in-school plan to manage the impact of significantly challenging behavioural, emotional or social needs.
- Other exceptional circumstances.

(The above wording is directly quoted from the UK site)

This is not to suggest that reduced timetables become a commonly used behavioural management tool but rather to recognise that there is a very small minority of students, who present with extreme behavioural challenges and who require interventions above and beyond what the vast majority of students require. The use of a short-term reduced timetable can facilitate the re-integration of such students as part of a wider support plan. We believe that this reality should be reflected in the guidelines.

- Section 4 Key Requirements:
The continuous use of the word 'must' may be considered excessively strong. Might there be merit in rephrasing the opening sentence as follows – 'Where schools are considering placing a student on a reduced timetable, the school MUST:'
And delete the word 'must' at the start of each bullet point?
f) and h) – there would appear to be some overlap here in relation to homework – is it not adequately covered in h) alone?
- **Section 5:**
Is there certainty that all the support services listed can provide the services to schools as outlined?
- **Notification Form:**
Section 3 – is there any need to include reference to a student's Ethnicity, especially when it is later referred to as 'optional'. Might it not be more equitable not to include any such reference?

Other General Observations:

- The appeal process is vaguely referenced in 5.4. Might there be merit in specifying that the appeal process is via Section 29, under a heading titled 'Appeals'?
- If the request for a reduced timetable comes from a parent, should it be specified that, like the school, the request would have to be evidence based (e.g. medical cert etc.). In this way it gives the school the necessary evidence to consider the request and avoids possible over-application for reduced timetable.
- What will be the position for student over 18yrs? Can the request for a reduced timetable be made by such students?

This concludes the observations of ACCS.

Appendix 8

(iii) ACCS Pre-Budget Submission to the Department of Education and Skills 2019

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Executive Summary

The Association of Community and Comprehensive Schools, ACCS, is the management body representing the Boards of Management of 96 post primary schools. In its remit as the representative organisation for community and comprehensive schools, ACCS submits the following pre-budget submission which is consistent with that of 2018. Of the three identified priorities:

Priority 1	The need for the ending of the moratorium and the funding of appropriate clerical/administrative and caretaking support for schools.
Priority 2	The Need to Enhance Leadership and Management Supports in DEIS schools.
Priority 3	Co-ordinated response to the challenges that school inclusion brings.

Priorities 1 and 2 remain similar and central to the objectives of ACCS. Priority 3 reflects a growing concern among member Boards that the vision shared by ACCS of promoting equal access for all to an education that is appropriate to their needs requires adequate resourcing if it is to be achieved.

ACCS recognises the myriad of demands on funding facing the Department of Education and Skills following a period of limited investment during the financial difficulties of recent years. Central to these demands will be pay equality for new entrants, not only in education but, across the Public Service. The significant capital investment programme in school buildings and facilities is also acknowledged. ACCS believes that investment in the identified priorities will provide significant support in improving services to students and communities served by our schools and assist in meeting the ambitious targets set out by the Minister and Department in Cúmasú, empowering through learning, Action Plan for Education.

Priority 1: The need for the ending of the moratorium and the funding of appropriate clerical/administrative and caretaking support for schools.

The introduction of the moratorium on the 27 March 2009 on appointments of clerical officers and caretakers in Community and Comprehensive Schools has seriously reduced the capacity of schools to meet the needs of students, teachers and parents. The burden has fallen ultimately on principals and deputy principals to cover the shortfall by incorporating basic tasks into an already overloaded work regime. This excess focus on administrative tasks has distracted significantly from the core purpose of principals and deputy principals as the leaders of learning and teaching in their schools.

ACCS acknowledges the first step taken by the Minister in alleviating this moratorium announced at the ACCS Convention of March 2019. This limited alleviation, allowing schools with a student enrolment of 700 or over appoint a second clerical officer, was an important recognition of the need to address this issue. Community and Comprehensive Schools receive significantly less per capita funding than other post primary schools given that clerical officers and caretakers are part of the Department of Education and Skills payroll.

ACCS recommends:

1. That the role of clerical officers be re-imagined to reflect the variety of the tasks associated with the role.
2. That the job description for clerical officers be expanded to include these areas of responsibility.
3. That the allocation of clerical/administrative support to schools be augmented.
4. That the pay scale and progression be examined to attract highly trained/experienced personnel to meet the role of senior clerical/administrative officer.
5. That the allocation of caretakers be restored to a level where schools can meet all their Health & Safety, Health & Hygiene, Repair & Maintenance obligations and expectations.

The implementation of the figures as per the Blackstock Report 1999 is seen in the table below:

School Size	Schools >1000 students	Schools < + = 800 students	Schools <=500 students
Clerical	2.6	2.2	1.5
Caretaking	2.6	2.2	1.5

Priority 2: The Need to Enhance Leadership and Management Supports in DEIS schools.

The Report on the Review of DEIS 2015 and the Action Plan for Education 2016-2019 acknowledges the need to build on the improvements achieved through the 2005 DEIS plan through a more broad-based package of measures encompassing all aspects of education impacted by disadvantage. The Advisory Group report noted the key role which school leadership has in promoting an environment that is welcoming, inclusive, accountable and focussed on high quality learning and teaching.

To have the capacity to engage effectively with planning requirements, DEIS schools need Leadership and Management support over and above what is required in schools in non-DEIS environments.

ACCS recommends:

1. That 1(one) additional Deputy Principal post be allocated to DEIS Schools with an enrolment between 400 and 699 students.
2. That an additional Post of Responsibility at Assistant Principal Level 1 be allocated to all DEIS schools with an enrolment of up to 400 students. In addition, it is proposed that a time allocation, equivalent to that allocated to the post of Deputy Principal in schools under 400 students be allocated to this post. This would facilitate time to fulfil the requirements of the DEIS programme in proportion to the size of the school.
3. That two additional Post of Responsibility at Assistant Principal Level 1 be allocated to all DEIS schools with an enrolment of and above 700 students. This would facilitate time to fulfil the requirements of the DEIS programme in proportion to the size of these schools.

Priority 3: Co-ordinated response to the challenges that school inclusion brings.

ACCS is committed to school inclusion ensuring equal access to a community based, comprehensive education for all equipping students with key life skills through an education that is appropriate to their needs. ACCS also acknowledges the significant investment by the Department of Education and skills in the provision for students with special education needs. This includes a dedicated teacher allocation to each school based on an individual educational profile of each school and support services accessible to schools through the National Council for Special Education, NCSE, and the National Educational Psychological Service, NEPS.

To ensure the maximum benefit of the significant investment by the Department in special education and to embed the principles of the NCSE Inclusive Education Framework, significant co-ordination is required at school level. Department of Education and Skills circular 0014/2017 states that:

“The extent of co-ordination time required to be used by schools will vary depending on school size, the number of students requiring additional teaching support, and the number of teachers providing this support. Co-ordination time, should however, be kept to a minimum..”

It is not enough to suggest that co-ordination be taken from a limited resource provided to meet the needs of students and this co-ordination time be kept to a minimum if maximum benefit is to be achieved from this significant, if finite, resource. A dedicated post of Special Education/Inclusive Education Co-ordinator is required in each school where the quantum of hours required for this position is identified based on the educational profile of each individual school.

ACCS recommends:

1. The creation of a dedicated Special Education Needs/Inclusive Education Co-ordinator in each post primary school.
2. The quantum of hours required for this position are identified based on the educational profile of each individual school.

Priority 1: The need for the ending of the moratorium and the funding of appropriate clerical/administrative and caretaking support for schools.

The Moratorium of 27 March 2009 froze clerical officer positions, halted recruitment and prohibited any future Grade 4 appointments.

The Moratorium also affected caretaking posts in schools in a similar manner prohibiting recruitment and replacement.

ACCS conducted research in the format of a survey of Community and Comprehensive Schools in April 2018 completed by 55 schools. The survey assesses the impact of the moratorium on schools which can be seen in the details set out below.

The table sets out the funding loss in three exemplar schools during this period.

Case Study	Loss to school Clerical	Loss to school Caretaker	Total
A. 2014 - 2018	€32,000 p.a. Clerical & Caretaking.		€128,000
B. 2012 - 2018	€37,339	€30,316	€293,913
C. 2011 - 2018	€32,433	€24,090	€306,402

The following narrative highlights evidence from Community and Comprehensive Schools as garnered in the research.

Evidence from our schools;

- "We have lost one full time caretaker and one secretary, yet our numbers have increased by over 300 pupils."
- "Huge burden placed on the pay budget. Almost entire SSSF budget now spent on additional part-time caretaker & part-time clerical officer. Cutbacks in cleaning hours come into effect in May 2018 to preserve pay budget. Upkeep of school grounds and general service delivery to staff has suffered hugely in past 10 years."
- "The school cannot function without 2 full time clerical officers at a minimum. Everything is now done on the run, half done, delayed, or simply left undone. The amount of regulation and reporting imposed on schools makes a mockery of the "leader of learning" tag for principals. Cutbacks have undermined management and mean we make more errors and cannot give time to education."
- "A full-time caretaker has not been replaced. We have only 1 school secretary, a second secretary is funded by the SSSF but is only paid 3 hours per day as that is all school can financially support. We are under severe pressure to maintain secretarial and maintenance services in our school and it necessitates overtime for the caretaker which as a school we cannot afford and we are under severe financial pressure, at times we struggle to pay the fortnightly wages."
- "Since the moratorium in 2010 we have not been able to balance our books (financially). The main reason for this has been down to hiring personnel to operate our office. We spend nearly all our SSSF on personnel to operate our office and our book rental system and library. If we were given a second allocation for a secretary, we would begin to balance our books again. It is vital we can start the new year in a financially sound setting."

Background: Formula for allocation of Clerical and Caretaking positions to Community and Comprehensive Schools.

School Size	Schools > 1000 students	Schools < + = 800 students	Schools <=500 students
Clerical	2.6	2.2	1.5
Caretaking	2.6	2.2	1.5

The introduction of the moratorium on appointments of clerical officers and caretakers has seriously reduced the capacity of schools to meet the needs of students, teachers and parents. The burden has fallen ultimately on principals and deputy principals to cover the shortfall by incorporating basic tasks into an already overloaded work regime. This restriction was contemporaneous with an increase in clerical tasks and a redesign of the relationship between schools and the Department of Education and Skills in terms of the compiling, recording and transfer of data. It has also now coincided with enhanced requirements for the recording, management and storage of data due to the GDPR and the introduction of increased regulation associated with Procurement, RCT, FSSU and Garda Vetting which all have in turn multiplied the tasks requirements.

The loss of the budget allocation for clerical officers and caretakers has seen schools try to stretch a budget, that is already depleted by 6%, to cover part-time clerical hours and contract cleaning, which in turn places additional strain on finances. A significant number of our schools cannot manage within the current budget allocation.

Part of the research

A comparison of supports clearly demonstrates the deficit in Community and Comprehensive Schools. The moratorium in 2009 envisaged a pause in recruitment. In May 2014 DPER indicated that the moratorium was over. The position of ACCS is that the pause has now become institutionalised and despite the recovery of the economy, there is little if any sign of restoration.

This loss of clerical positions results in:

- Significantly increased workload for the remaining clerical officer and the Senior Management Team.
- The distraction for the Senior Management Team from essential tasks including leading teaching and learning and School Self Evaluation. This has been relentless.
- Inefficiency in managing administrative tasks, in a climate where accountability is expected.
- Poorer delivery of the Minister's agenda of improving school relationships with parents, building parent capacity and engagement.
- A reduction of the quality of the service to students, parents and staff. Very often schools are offline to parents for significant parts of the day.
- Schools are introducing a casualisation of employment through irregular part-time hours to try and meet needs. This is not in the best interests of the organisation and represents risk on several fronts.

This loss of caretaking positions results in:

- School is not maintained to a proper standard.
- Delays in completing basic cleaning, maintenance and repairs with consequent health and hygiene risks.
- Loss of morale due to deteriorating infrastructure.
- Task overload for single caretaker who cannot work excessive hours. This is leading to frustration and burnout and putting pressure on facilitating extracurricular activities. Schools with substantial grounds no longer have a maintenance capacity.
- Schools not being available to local community on as regular a basis as before and thus a reduction in shared services. (Action Plan)

Supporting argument from research:

1. Under the terms of the moratorium the supports available to manage and maintain schools were reduced while the tasks in schools have continued to grow.
2. The role of the principal in 2018 has evolved from the role held prior to the moratorium of 27 March 2009.
3. The accompanying reduction in the capital budget has seen schools unable to carry out basic repairs, maintenance and indeed cleaning.
4. Clerical and Senior Management are under increased pressure from increased workloads (e.g. induction, whole school evaluation, new management of information systems, significantly increased number of correspondence due to HSE, NEPS, EWO FSSU, PPod, Procurement, Governance, Revenue Audits.
5. The enhanced middle management structure will require clerical support.
6. The management of Junior Cycle has introduced further clerical and administrative requirements.
7. There has been a significantly increased range of correspondence to parents often left for the SMT to produce and issue. At the same time the Minister is directing schools to increase consultation and engagement with parents.

ACCS recommends that the moratorium on appointments to clerical and caretaking appointments be ended and proposes:

- A) That the role of clerical officers be re-imagined reflecting the variety of the tasks associated with the role and that the job description for clerical officers be expanded to include these areas of responsibility. **(See Appendix 1 and graphic comparator)**
- B) That the allocation of clerical/administrative support to schools be augmented – **refer to Blackstock Report. (See Appendix 2)**
- C) That the pay scale and progression be examined to attract highly trained/experienced personnel to meet the role of senior clerical/administrative officer. **(See Appendix 3)**
- D) That the allocation of caretakers be restored to a level where schools can meet all their Health & Safety, Health & Hygiene, Repair & Maintenance obligations and expectations.

Priority 2: The Need to Enhance Leadership and Management Supports in DEIS schools.

ACCS believes that designated DEIS post-primary schools must be considered for enhanced support at management level.

Currently all post-primary schools receive the same allocation of Senior (Principal/Deputy Principal) and Middle (AP1 and AP11) Management posts. This allocation is recognised as necessary to lead and manage any school effectively. But, additional to this, DEIS schools have considerable additional workload as acknowledged in the Report on the Review of DEIS 2015. This report and the Action Plan for Education 2016-2019 acknowledge the need to build on the improvements achieved through the 2005 DEIS plan through a more broad-based package of measures encompassing all aspects of education impacted by disadvantage. There is also a recognition that significant challenges remain for DEIS schools.

The Advisory Group report noted the key role school leadership has in promoting an environment that is welcoming, inclusive, accountable and focussed on high quality teaching and learning. To have the capacity to engage effectively with DEIS planning requirements, these schools need Leadership and Management support over and above what is required in schools in non-DEIS environments. This support would provide dedicated personnel whose primary remit would be to develop all aspects of the DEIS plan, to bring consistency to the process and to give DEIS the primacy it requires at school level to be most effective.

Currently 29 Community and Comprehensive Schools are designated DEIS.

ACCS recommends:

1. That 1(one) additional Deputy Principal post be allocated to DEIS Schools with an enrolment between 400 and 699 students.
2. That an additional Post of Responsibility at Assistant Principal Level 1 be allocated to all DEIS schools with an enrolment of up to 400 students. In addition, it is proposed that a time allocation, equivalent to that allocated to the post of Deputy Principal in schools under 400 students be allocated to this post. This would facilitate time to fulfil the requirements of the DEIS programme in proportion to the size of the school.
3. That two additional Post of Responsibility at Assistant Principal Level 1 be allocated to all DEIS schools with an enrolment of and above 700 students. This would facilitate time to fulfil the requirements of the DEIS programme in proportion to the size of these schools.

The proposal is merited when the complexity and breadth of work necessary for effective management in DEIS schools is considered.

Context

The context in which DEIS schools operate has a significant impact on the levels of management required to ensure that students are afforded the best possible educational opportunities.

DEIS schools deal with the economic, social and educational consequences of disadvantage daily. Enrolment shows relatively high numbers of students with Special Educational Needs compared to non-DEIS schools. There is also a greater prevalence of students from Traveller backgrounds and non-English speaking students. DEIS schools cater for a range of more complex needs than other schools. Behavioural issues are more common as

evidenced by NBSS statistics, indicating that 89% of post-primary schools working with the NBSS are DEIS schools requiring supports ranging from school-wide support to intensive individualised support for individuals and small groups of students. Literacy and numeracy levels are below average among many students. The potential of high achieving students must be supported and realised. Families rely more heavily on the schools for support and educational guidance.

To cater for the varying educational needs of all students, DEIS schools provide a wider range of programmes, including Junior Certificate Schools Programme, Leaving Certificate Applied, Leaving Certificate Vocational Programme and Friends Programme. These programmes require extensive planning, timetabling and monitoring.

DEIS schools open earlier, close later and run beyond the regular school year. Breakfast clubs, after-school homework clubs and holiday time provision require greater management involvement than non-DEIS schools.

Daily, teachers, post-holders and senior management in DEIS schools deal with more complex situations, support educational achievement and have more 'hands-on' involvement with students and families than would be required in non-DEIS environments.

DEIS Plan 2017

DEIS Plan 2017 identifies a range of areas that will require more detailed planning and monitoring and a far more wide-ranging involvement with the community, agencies and services. Undoubtedly this has the potential to develop more cohesive and effective interventions and strategies, with better outcomes for students. However, enhanced management resources will be required if this plan is to be realised. The ad-hoc nature of initial DEIS planning (2005) was identified as a serious weakness in the process. In no small part this was due to the inability of schools to allocate the necessary time and personnel to plan, oversee and evaluate the programme. The DEIS Plan 2017 outlines a programme that will involve greater planning and activity at school level and also substantially more collaboration between schools, communities and agencies. To be successful it must be managed effectively.

As well as the management requirements that are the norm in every school, DEIS schools will be further required to:

- Oversee a monitoring and evaluation framework with a focus on outcomes for students. Targets to improve learner outcomes and learner opportunities will have to be evidence-based, monitored, evaluated and reported. Schools will have to recognise effective interventions and adjust plans where more effective interventions will be needed.
- Build the capacity of teachers and middle management. Staff in DEIS schools require enhanced support, especially in the initial stages of employment. A wide range of on-going CPD is necessary to enable teachers to understand and effectively work with students who rely heavily on teacher commitment. For DEIS planning to be effective, there must be buy-in at whole school level. This requires a level of planning and organisation unique to DEIS schools.
- Develop and build on relationships with the community, local businesses and to work in co-operation with their LCDC/CYPSC's. This area of DEIS planning alone requires a level of out of school engagement that could not be realised if it were to have the effect of further depleting the availability of management personnel working at internal school level.
- Work collaboratively in strategic clusters of schools in an area. To be effective this process will take time to develop and requires on-going and consistent involvement

from all partners which again requires the consistent availability of senior management.

- Formal arrangements to support transitions will have to be included in school plans. This will require close liaison with HSCL teachers, Guidance Departments, Primary Schools, HE Access Officers and FET providers.
- Support families to have greater engagement with schools and engage with the relevant services for parental participation supports. Families and individual parents need extensive support to encourage student attendance, participation and progress. Many parents do not have the educational 'insider' knowledge to help students realise their potential. The range and level of interaction between school and parents cannot be under-estimated and is crucial to student outcomes.
- Engage with an extensive range of Agencies and services, including TUSLA, NEPS, SCP, Local Partnerships, NCSE, ISS, HSE, Gardaí, HE Access Officers, LCDC and others.
- Fulfil reporting requirements to a variety of departments/agencies.
- Implement a School Meals Programme.
- Work to bring greater cohesion to out of school activities.
- Consult more widely with parents and students.
- Realise the positive potential of integrating the Arts in the education programme of the school.
- Manage an enhanced range of Administrative Tasks, including Budgets, Schools Meals Programme, SCP and Book Grants.

School management and staff working in DEIS schools have undisputable commitment to students and to achieving the best possible outcome for all. However, the tasks involved in achieving this are onerous and not comparable to the management of schools in non-DEIS areas. DEIS schools need to be able to attract and retain school leaders and teachers of the highest calibre. To enable this, the extended nature of their work needs to be recognised and supported. An enhanced allocation at management level gives recognition to the difference between schools and enables those working in DEIS schools to fulfil the requirements of the DEIS programme.

Priority 3: Co-ordinated response to the challenges that school inclusion brings.

ACCS is committed to equal access to a community based, comprehensive education for all equipping students with the key life skills through an education that is appropriate to their needs. The NCSE Inclusive Education Framework and the provisions of CL14/2017, Special Education Teaching Allocation, provide guidance on how this should be achieved in schools. "Introducing a new model for allocating Special Education Teaching Resources to mainstream schools, to end the unfairness which existed previously, when many parents were unable to access the assessments needed to qualify for educational resources", is one of the key developments in the area of education inclusion in post primary education referenced in Cumasú, empowering through learning, Action Plan for Education. ACCS supports this initiative but is also conscious of the challenges it places on school management implementing the required changes.

CL 0014/2017 provides detail on the 'new' model for allocating teaching resources to schools to meet the needs of students with special/additional educational needs. The development of a school educational profile on which the allocation is based is welcome. There are significant roles to be fulfilled by the school to ensure this valuable resource is utilised to it maximum potential including:

- Identification of students for support
- The role of the classroom teacher
- Identification of the most appropriate intervention to meet individual student needs
- Creation and retention of appropriate plans
- Coordination of communication between student, parents and relevant staff
- Deployment of staff
- Liaison with support agencies
- Overall co-ordination tasks

When the provisions of CL 0014/2017 are considered in conjunction with the themes of the NCSE Inclusive Education Framework the challenges are there to be seen.

Table 1: Themes and sub-themes of NCSE Inclusive Education Framework

Themes	Sub-themes
1. Leadership and Management	
2. Whole-School Development Planning	
3. Whole-School Environment	
4. Communication	
5. Pupil and Staff Well-being	a) Fulfilling Pupil Potential b) Fulfilling Staff Potential
6. Curriculum Planning for Inclusion	
7. Individualised Education Planning	
8. Teaching and Learning Strategies	a) The Learning Experience b) The Teaching Experience
9. Classroom Management	a) Classroom Protocols and Rules b) Curriculum Implementation
10. Support for and Recognition of Learning	a) Informal and Formal Assessment b) External Assessment and Certification (post-primary aged pupils)

The ad-hoc provision in CL 0014/2017 to take a quantum of time from the teacher allocation provided and the proviso that “co-ordination time, should however, be kept to a minimum”, do not realistically meet the requirements. To ensure that the significant resources are utilised fully and the principles underpinning inclusive education are embedded the co-ordination of special education needs requires a specific dedicated post where the quantum of time is determined by the educational profile of the school.

The Recommendations of the Joint Committee on Education and Skills Report on Education inequality & disadvantage and Barriers to Education (May 2019) p 31, implicitly recognises the need for additional supports for DEIS schools.

ACCS recommends:

- The immediate establishment of a dedicated Special Education Needs/Inclusive Education Co-ordinator post in each school.
- The quantum of time required for co-ordination to facilitate the dedicated Special Education Needs/Inclusive Education Co-ordinator post is aligned with the educational profile of the school.

Conclusion

There is a requirement to reinvest in administrative and caretaking supports in schools. These supports will assist senior management in practical ways to lead and manage effective and efficient school organisations for the benefit of all learners in the school. Goal 3 of the Action Plan for Education 2018 stresses the need to provide *“ongoing practical support to the key people in the education sector is vital if we are to realise the ambitious objectives that we have for Irish education”*.

Parents and students are key stakeholders in the teaching and learning process and this is recognised in Cúmasú, empowering through learning, Action Plan for Education. From admission to graduation the needs of parents and their students are many and varied and in order for the school organisation to be able to meet these effectively there must be in place a proper robust infrastructure to deal with administration. ACCS stresses the need to implement in full the staffing levels for administrative and caretaking supports as recommended by the Blackstock Report as far back as 1999. It is also important that all schools have a minimum of one Grade IV secretarial position within this allocation to employ personnel with the necessary skills to address the complexity that now exists in the administration of Community and Comprehensive schools.

The additional challenges facing students in our most disadvantaged communities are well documented. There are ambitious goals set in the Cúmasú, empowering through learning, Action Plan for Education, with a recognition of the key role of leadership positions in schools to meet these needs. ACCS calls on enhanced leadership roles in DEIS schools to support the excellent work taking place in DEIS schools as evidenced in the 2015 DEIS Review report.

There has been significant investment by the Department in additional resources for students with special education needs and the promotion of inclusive schools. To maximise the effectiveness of this investment proper co-ordination must be provided at the point of delivery of the service, i.e. at school level. In Cúmasú there is a commitment to “strengthening supports for learners with special education needs”. Co-ordination of such supports at the point of delivery should be prioritised.

There is a requirement to invest strategically to meet these ambitions. ACCS stresses the importance to focus reinvestment in:

- Administrative and caretaking supports in schools.
- Leadership roles in DEIS schools.
- Co-ordination of Special Education Needs to embed the principles of the NCSE Inclusive School Framework.

This reinvestment needs to be accompanied with the continued reversal of direct funding in post primary schools. ACCS welcomed the increase of 5% in capitation funding to post primary schools in Budget 2018. If we are committed to meeting the ambitious goals of Cúmasú, empowering through learning, Action Plan for Education, the reversal of the remaining 6% of the cut in direct funding to schools should be prioritised.

Appendix 1

Proposed Job Description for a Clerical Officer/Administrator in Community and Comprehensive Schools

Reporting to: Principal

Job purpose: To support and provide financial, administrative and secretarial support to the Principal and SMT and work within the office management team.

The successful applicant should display evidence of capacity in a wide range of the following key responsibilities

Finance

- Prepare the payroll.
- Reconcile and prepare all revenue on-line returns.
- Administer payroll on OLCS.
- Monitor, control and reconcile all financial allocations to the school (e.g. main school budget, Home School Liaison, Free Book Scheme, Exam Fee Scheme, Special Technology Grants, Adult Education, Mock Exams, Practical Exams etc).
- Ensure all payment to the school are recorded, receipted, reconciled and lodged to the appropriate bank accounts.
- Collect rent for use of premises, enrolment fees, book rental fees, school trips etc.
- Check and ensure accuracy of trader's accounts, part-time teachers and teacher's claims forms, travel forms, franking machines and expenses for Board of Management members.
- Assist in preparation for yearend audit.
- Arranging payment of all invoices authorised for payment. Keep and record monthly petty cash payments.
- Monitor and control the school's cash flow.
- Prepare monthly/annual accounts (including Adult Education), bank reconciliation etc. in accordance with Department of Education and Skills guidelines. Provide reports as requested to principal.
- Prepare reports for the Finance Committee as required.
- Liaise with Financial Support Services Unit on financial matters and outsourcing companies regarding maintenance and other contracts. Manage ordering of materials in accordance with Frameworks.
- Lodge cash/cheques and manage online banking including online payments and transfers.

HR Administration

- Support the administration for the recruitment and appointment process for teachers, SNAs and other staff in accordance with the procedures, including placing advertisements, correspondence with candidates, preparing interview related paperwork and ensuring that the recruitment and selection process is documented.
- Prepare offer letters, employment contracts and new employee starter packs.

- Maintain a Staff List, including the Seniority List.
- Administer and assist with the organisation of staff training including updating, maintaining and recording all training activities completed.
- Update and maintain staff leave of absence and administer on-line OHS referrals.
- Provide monthly/quarterly sickness absence reports for the Principal.
- Ensure all staff files are accurately and securely maintained.
- Manage school calendar and co-ordination of SMT diaries.

Student Administration and Academic Records

- Manage the student database and prepare DES October Returns, Systems Report design and backups.
- Administer and prepare documentation in connection with new admissions, including communication with parents, subject option forms, booklists and preparation for Assessment Open Day.
- Administer and assist with the scheduling and organisation of parent teacher meetings for all year groups.
- Assist with the organisation and administration of Student Award Ceremonies/Graduation Night and other events including providing information to parents and producing award/graduation certificates for students.
- Produce booklists for each year group and administer the School Book Grant Scheme.
- Assist with school journals, including Transition Year.
- Prepare and issue In-House Student Assessment Reports for each Year Group. Issue reports to Year Heads for signing, copying and posting.
- Prepare statistics for Year Heads in relation to in-house exam results.
- Prepare statistics for Year Heads of State Examination Results and liaise with the State Examinations Commission regarding state examination issues.
- Prepare student attendance reports for Year Heads and maintain on-line returns to TUSLA.
- Provide administrative support for school extra-curricular and fundraising events (e.g. Plays, Musicals, Sport, 5K Fun Run, etc.)

ICT

- Maintain the student database management systems (PPOD Facility Admin Scheduler), including the continuous maintenance of teaching groups/timetable changes etc.
- Apply Data Protection Policy requirements in the maintenance of all records.
- Provide support with the maintenance of the school website.
- Liaise with relevant software/hardware support agencies in developing new systems.

Secretarial Support to the Principal

- Provide secretarial and administrative support to the Principal in his/her role as Principal and Secretary to the Board of Management. Manage the Principal's diary.
- Maintain on behalf of the Principal all confidential matters relating to the administration and management of the school and operate secure filing systems.

- Provide assistance with the preparation for the Principal's Report for the Board of Management and the Principal's Report for the PTA.
- Provide administrative support re: Emergency Works Scheme, Summer Work Scheme and Sports Hall etc.
- Prepare grant applications to various agencies.
- Liaise with State Claims Agency as appropriate. Maintain Accident Report Forms and Claims Form (Pupil Personal Accident) for insurance purposes.

Communication/PR

- Assist with producing the Yearbook/School Journal and School Information Booklets.
- Send texts to parents/guardians, Board members and staff as directed by the Principal.
- Control all incoming/outgoing school email on the general email account.
- Liaise with outside agencies, local primary schools, Youth Reach, other 2nd level schools, DES, TUSLA, sporting organisations and others.

Procurement

- Maintain school order books, acquire tenders, and submit requisitions to Principal for approval.
- Liaise with School's Procurement Unit on procurement matters.

Administrator to the Board of Management

- Deal with all correspondence for the Board. Assist the Principal with the preparation for Board of Management meetings. Record minutes of the Board meeting if requested.
- Submit copies of the BOM meeting to the DES and Board Trustees.

General Office Administration

- Cover reception as and when required.
- Manage the diary for the senior management team.
- Organise catering on Staff Days or for DES/guest visits.
- Ensure all correspondence is passed to relevant personnel effectively.

Person specification

- ✓ Knowledge and experience of accounts software package(s).
- ✓ Strong IT skills particularly Excel and MS Office package.
- ✓ Experience of managing budgets and preparing financial reports.
- ✓ Ability to communicate well (both written and oral), including with staff, parents and students.
- ✓ Ability to complete tasks to deadline.
- ✓ Well organised with experience in developing efficient administrative systems.
- ✓ An understanding of working in a school environment.
- ✓ Strong interpersonal skills, emotional intelligence and affinity with children.

Appendix 2: The Blackstock Report, Department of Education and Skills, 1999.

The report:

- Outlined the difficulties in getting usable data.
- Highlighted the differences between sectors.
- Stated that a financial management model should be made available to schools to assist in achieving uniformity in presentation of school accounts.

ACCS has a very small but highly effective secretariat advising and supporting Boards of Management in the Community and Comprehensive sector for 96 schools with 60,000 students approx.

Allocation is currently capped at a maximum of one clerical officer in each school. Working under the guidance of the Board of Management and the School Principal, the clerical officer in a Community/Comprehensive School is responsible for all administration tasks including Finance, HR administration, student administration and academic records, ICT administration, secretarial support to the Principal, administration with regard to communication/PR, procurement, general office administration and specific Board of Management administration.

The recommendations from the Blackstock Report include the following:

- Schools of 500 pupils: 1.5 Secretarial 1.5 Caretaking
- Schools of 800 pupils: 2.2 Secretarial 2.2 Caretaking
- Schools of 1000 pupils: 2.6 Secretarial 2.6 Caretaking

Comparison with the administrative supports in a 1000 + Pupil School Northern Ireland

In support of the school Principal, 2 Deputy Principals and 2 Senior Teachers, Sixth Form Supervisor the school has the following administrative support available.

General Manager	1
Executive Officer	3
Senior Clerical Officer	1
Senior Clerical Officer/Attendance	1
Caretaker	2
Building Supervisor	1
Technicians	6

Organisational map of the current staffing levels in a large English publicly funded post-primary school. Note again the level of administrative, maintenance and technical support available.



Appendix 3: PAY SCALES FOR SCHOOL SECRETARIES IN COMMUNITY AND COMPREHENSIVE SCHOOLS WITH EFFECT FROM 1 SEPTEMBER 2019

Grade III:

Scale Point	Pre-1 January 2011 Entrants 01/09/2019	Post-1 January 2011 Entrants 01/09/2019
1	€ 25,964	€ 23,999
2	€ 26,753	€ 25,576
3	€ 27,902	€ 25,964
4	€ 29,056	€ 26,753
5	€ 30,211	€ 27,902
6	€ 31,047	€ 29,056
7	€ 32,156	€ 30,211
8	€ 33,261	€ 31,047
9	€ 34,045	€ 32,156
10	€ 35,142	€ 33,261
11	€ 36,244	€ 34,045
12	€ 38,320	€ 35,142
13		€ 36,244
14		€ 38,320
*Long Service Increment	€ 39,794	€ 39,794

*** after 3 years satisfactory service at the maximum**

Grade IV:

Scale Point	Pre-1 January 2011 Entrants 01/09/2019	Post-1 January 2011 Entrants 01/09/2019
1	€ 30,741	€ 28,048
2	€ 32,850	€ 29,966
3	€ 34,645	€ 30,741
4	€ 36,218	€ 32,850
5	€ 37,735	€ 34,645
6	€ 39,787	€ 36,218
7	€ 41,270	€ 37,735
8	€ 42,777	€ 39,787
9		€ 41,270
10		€ 42,777
*Long Service Increment 1	€ 44,163	€ 44,163
**Long Service Increment 2	€ 45,555	€ 45,555

- * after 3 years satisfactory service at the maximum
- ** after 3 years satisfactory service at the 1st Long Service Increment Increment

Appendix 8

(iv) Submission to the Joint Committee on Education and Skills on the topic of current use of reduced timetables.

Reduced Timetables in Schools

ACCS, the Association of Community and Comprehensive Schools represents 96 post primary schools nationally. A core principal of community and comprehensive school is that each student should receive an appropriate education in an inclusive setting within their local community. Therefore, community and comprehensive schools educate students of all academic abilities and with a wide range of needs. Thirty of our schools have DEIS status and a sizable number of the schools have facilitated the opening of ASD and Special Classes.

From the outset it is important to state that the use of reduced timetables is neither common nor a widespread practice in our schools. In cases that it has been reported the predominant reasons are:

- Transition from primary to post primary school
- The management of extreme behaviour
- Illness/disability
- Pregnancy in certain circumstances

Transition from Primary to Post Primary

A reduced timetable may be put in place for a student with transition difficulties. Hours are reduced and gradually built up once it is deemed appropriate. Students on the autism spectrum often find it more challenging and take longer to transition from primary to post-primary. Schools have found this to be the case even where greater preparation for the move has been made through transition plans. Many have great difficulty dealing with the enormity of change e.g. longer school day, no base classroom, moving to specialist subject rooms, increase in school personnel (teachers/SNAs) etc. Over time schools develop strategies to meet the needs of the individual student and help them manage the stresses of their new school environment.

Management of extreme behaviour

It must be said that schools go to extraordinary lengths to work with and support students with severe behavioural issues, using all resources and personnel available within the school. The severe behaviour that may result in a reduced timetable generally has continued to occur over a long period of time and without improvement regardless of the supports put in place. Examples of such behaviours may include, extreme regular physical disruption of classes by throwing or breaking of classroom furniture, physical abuse of other students, extreme verbal abuse of teachers and others in class, physical bullying of students in school grounds/corridors etc. Schools are often left working in isolation to manage such behaviour. The access needed to out of school supports, such as a range of therapy supports, access to NEPS or social workers is simply not available. Waiting lists are long and the workload of many professional support services makes it impossible for them to engage in a meaningful way to support students presenting with severe difficulties.

It is only when every other strategy has been exhausted that a reduced timetable may become an option for a limited period. It is not something that schools enter lightly into, but a reduced timetable for a limited period can be the only option other than a school resorting to suspension or more long-term exclusion. It can be a positive intervention where it gives the school, the parents and the student the opportunity to consider what can be done to facilitate a return to full timetable. The frustration of a parent when a child is on reduced timetable is understandable. Often the behaviours presenting in school are replicated at home. Parents and schools need access to an integrated support service to advice and guide them in managing severe behaviour issues, especially in more disadvantaged communities; but there is not an integrated home/school service that can respond in a timely manner or work consistently over a period of time to improve a situation.

The balance between the rights of the individual child to an education with the rights of all other students to the same must also be considered. Where the student's behaviour is a persistent cause of significant disruption to the learning of others or to the teaching process and all interventions have failed to remedy the situation, the reduced timetable may be considered as an option as opposed to exclusion from school. The same applies where the student's continued presence in the school constitutes a real and significant threat to safety. Here again school management has a responsibility to ensure the safety of all members of the school community. A reduced timetable may help to avoid 'trigger points' in the day, may give the student a better chance of engaging for a shorter period or may allow the student realise that certain behaviours have to change to allow them participate fully in school. It allows the teacher time to concentrate on working with the class as very often an individual with severe behaviour issues requires a disproportionate amount of a teacher's time.

Illness/Disability

Many students with a disability or medical conditions engage fully with the school day and the full school curriculum. For some, with medical conditions, the full school day can be difficult to manage. It is difficult to generalise or to be prescriptive in these situations because the situations are as individual as the students and can change depending on the nature of the disability. Communication and planning between home and school is key. Often when a reduced day is facilitated it is to allow a student fulfil care needs, necessitating a later start or maybe a slightly earlier finish where the school day is too physically exhausting. Generally, these situations can be managed between home and school. Where a medical condition necessitates a reduction in the number of subjects undertaken by a student, this is integrated into the student's educational plan and additional supports via learning support/resource are put in place to support the agreed curriculum.

There are times when students fail to cope with the full school day. This can be as a result of some trauma, change in circumstances outside school or a student's personal development stage. School can become a major stress factor in a student's life and at times the only option can be to reduce their obligation to attend full-time for a limited period. What is lacking in these circumstances, is access to professional support services to work with home and school to manage the situation to achieve the best possible outcome for students. Not altogether central to this debate is the issue of 'where after school' for many students with additional needs. Some students, often those with autism, remain in school after it is no longer the most appropriate setting, but with very few alternative options. For these students' school can be a frustrating place. Where there some means to allow such students continue in school for a reduced period, while at the same time accessing training geared to life after school, students may make better transitions from one stage to the next.

Pregnancy

Pregnancy necessitates an individual response. Many go through pregnancy and continue in school without any issue, requiring only extra pastoral supports. The issue becomes difficult where a student, through pregnancy related illness misses long periods in school or where attendance becomes intermittent.

Recommendations

Careful consideration needs to be given to this issue and to the possible consequences of proposals.

Mainstream schools are encouraged to be inclusive. Schools have worked hard to expand their educational programmes, upskill teachers, open special classes etc and many now successfully accommodate a much more diverse community of students. But schools are still a mainstream setting, without the additional resources, lower pupil-teacher ratios or support staff that are allocated special schools/settings. Students in mainstream settings are in classes of up to 30 students, (other than those in classes specifically for students with ASD or Special Classes). Teachers, while trained to varying degrees to teach students with additional needs, do not have the training necessary to work with students presenting with extreme difficulties.

There are limitations to what can be managed in a mainstream class. It must also be realised that not all students can always manage a full school day. At times, a student can become overwhelmed. If a reduced timetable is not an option, we need to consider what needs to be put in place in school settings to allow all students to attend for a full day. As in other jurisdictions, personnel such as Speech and Language Therapists, Occupational Therapists, Nursing services, Behaviour Therapists, additional Support Staff etc would have to be available to all schools as needed to plan programmes, manage medical needs and supervision. These supports work in other countries, but even in these jurisdictions there is provision for reduced timetable provision. Currently, our education system does not have such a support structure in place for schools and this must be a consideration when considering the place of a reduced timetable. ACCS welcomes the announcement of the pilot support services for schools consisting of therapeutic and psychological support professionals. Their expertise and guidance are essential to ensure the needs of students are met.

Recommendations

- Some of the media articles in recent times have implied that the practice of reduced timetable is widespread, but oral evidence from schools would suggest otherwise. Rather than hastily make recommendations it may be prudent to attain accurate data to establish the actual extend of the issue. But schools do not need another layer of administrative work. This information could be easily acquired by the addition of a column in the Annual Attendance Report to include the number of students, if any, on reduced timetable, the reason for same and the length of time involved.
- Other jurisdictions have developed guidelines around managing reduced timetables which may be of relevance after data around current use of reduced timetable has been established.

- Schools have reported very positive experience of interventions such as that provided by Middletown Centre for Autism. One particular intervention was for 9 months where visits were made to home and school on a weekly basis to support the needs of the student. Middletown only take on 6 cases per year from the Republic of Ireland, but this experience has highlighted the importance of the link between home and school and what can be achieved when this support is in place. Would it be possible to suggest that home/school liaison provision be established in all schools to create that link?
- More training for teachers on the wide range of additional needs students present with and the social issues which may affect students.
- Formal CPD for SNAs is essential.
- Greater links established between schools and outside support agencies accessed by those students in receipt of them e.g. CAMHS. There may be GDPR issues but from a school perspective it appears there is a disconnect between CAMHS, Psychologists, SLT, OTs etc. Professionals should be working together to meet the needs of students. Collaborative Multi-disciplinary meetings should be held regularly to support students in need.

Thank you for the opportunity to engage in this consultation.

Appendix 8

(v) Opening Statement to the Joint Committee on Education and Skills on the topic of the status of non-teaching staff in schools.

Introduction

The Association of Community and Comprehensive Schools, ACCS is the representative body for the Boards of Management of 96 Community and Comprehensive schools providing a multi-denominational, inclusive and comprehensive education to over 60,000 post primary and further education students. Many of these 96 schools provide lifelong educational opportunities to approximately 25,000 adult learners in self-financing adult education programmes in the communities they serve. In many cases school facilities are made available for local community use outside school hours.

Pre-Moratorium Position

Prior to the introduction of the public sector moratorium with effect from 27 March 2009 Non-Teaching Staff positions (Clerical & Maintenance) were approved and allocated by the Department to Community and Comprehensive Schools in accordance with the number of pupils enrolled as outlined in the following table.

Secretarial Posts (W.T.E)	Student enrolment	Caretaker Posts (W.T.E)	Student enrolment
1.0	Up to 375	1.0	Up to 418
1.5	376 to 625	1.5	419 to 506
2.0	626 to 750	2.0	507 to 550
2.5	751 to 1,200	2.5	551 to 750
3.0	1,201 to 1,650	3.0	Over 751
4.0	Over 1,650	N/A	

Moratorium March 2009

Since the imposition of the moratorium on appointments in the public service Community and Comprehensive Schools have been restricted to the appointment of positions to a maximum of 1 clerical officer and 1 caretaker.

This has severely curtailed the ability of schools to provide the quality of service they require in their schools.

Alleviation April 2019

ACCS appreciates the Minister for Education and Skills' acknowledgement of the administrative burden on Community and Comprehensive Schools particularly for larger schools, by his recent relaxation of the moratorium with effect from 1st April 2019 for those with enrolments of 700 or more which will allow them employ an additional Clerical Officer up to a maximum of two per school. This welcome alleviation is seen by ACCS as an important first step in the restoration of essential posts in schools. A timeframe for the complete alleviation of the moratorium is now required.

Cumasú, Action Plan for Education 2019

Action No.74 in the 2019 Action Plan commits to "Support the operation of a high-quality school system through the annual provision of teaching and financial supports. . ." This is consistent with Goal 3 of the previous Action Plan for Education which stressed the need to provide, "ongoing practical support to the key people in the education sector is vital if we are to realise the ambitious objectives that we have for Irish education". 'Looking at our School 2016, A Quality Framework for Post Primary Schools', rightly places an emphasis on the leadership of learning and teaching in schools. Goal 4 of Cumasú, the 2019 Action Plan records "We will intensify the relationships between education and the wider community, society and the economy." An open, welcoming, well-maintained environment is fundamental to achieving this aim and our clerical officers and caretakers play an essential role in our schools. It is also of interest that one of the indicators of Pupil Wellbeing is whether "The physical environment of the school is well kept and bright."

It is essential we support school leaders with adequate clerical and maintenance personnel to ensure they can meet their requirements in leading learning and teaching for the benefit of all learners in schools.

Increased regulation and work load

During this moratorium schools continue to grapple with significantly increased regulatory obligations in areas such as data protection and child protection. This has been accompanied with the introduction of the Post Primary Online Database and the introduction of new financial reporting systems with the support of the Financial Support Services Unit, FSSU. Clerical officers are key to the delivery of these initiatives. Without adequate clerical officer support in these areas school management cannot deliver on their obligations. The additional workload is no longer sustainable.

With reductions in maintenance staff, facilities cannot be maintained to the required standards. The immediate is all that can be addressed and essential planned maintenance programmes are difficult if not impossible to implement. This is simply storing up potential problems which will ultimately require significant expenditure to correct. Adequate Caretaking and Cleaning personnel is essential to meet The State Claims Agency obligations under Managing Health & Safety in Schools. Many Community and Comprehensive Schools provide access to facilities to their local communities outside of school time. This tradition will be potentially damaged due to the lack of availability of caretakers to open and maintain facilities.

Clerical and maintenance personnel provide loyal and dedicated service in schools throughout the country and it is time to ensure the required levels of staffing are restored to provide essential services in schools.

Appendix 8

(vi) Submission to the Joint Committee on Education and Skills on the status of non-teaching staff in schools

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1. Executive Summary

ACCS Organisational Priority No. 1: The need for the ending of the moratorium and the funding of appropriate clerical/administrative and caretaking support for schools.

The introduction of the moratorium of 27 March 2009 on appointments of clerical officers and caretakers in Community and Comprehensive Schools has seriously reduced the capacity of schools to meet the needs of students, teachers and parents. The burden has fallen ultimately on principals and deputy principals to cover the shortfall by incorporating basic tasks into an already overloaded work regime. This excess focus on administrative tasks has distracted significantly from the core purpose of principals and deputy principals as the leaders of learning and teaching in their schools and could compromise the Minister's ultimate goal in establishing the best education system in Europe within a decade.

In the last fifteen years schools have multiplied their engagement with their communities. They have taken on social responsibilities often supporting deficits in family structure and capacity. The number of agencies with which schools engage on behalf of their pupils has increased annually. Schools are expected to be welcoming and inclusive, fostering parental engagement in the development and growth of their children. It has been difficult to sustain this engagement and promotion of parental participation as in many of our schools there are inadequate clerical personnel to answer the phone, deal with parent queries not to mention support the clerical and administrative needs of the school.

We are encouraged to support the access to school facilities for the local community. The deficit in caretaking personnel has restricted this admirable ambition while impacting negatively on the capacity of schools to manage an adequate maintenance and cleaning schedule.

Schools have experienced a double jeopardy caused by the Moratorium on clerical and caretaking appointments. Because clerical functions and caretaking tasks must be discharged to sustain the operation of the school, these roles have been funded from the general school budget, a budget which is already inadequate and which itself suffered an 11% cut. This means that funds which should be invested elsewhere are being diverted to cover essential clerical and caretaking needs. The loss of funding has been dramatic for many of our schools.

ACCS conducted research in the format of a survey of Community and Comprehensive Schools in April 2018 completed by 55 schools. The survey assesses the impact of the moratorium on schools which can be seen in the details set out below.

The table sets out the funding loss in three exemplar schools during this period.

Case Study	Loss to school Clerical	Loss to school Caretaker	Total
A. 2014 - 2018	€32,000 p.a. Clerical & Caretaking.		€128,000
B. 2012 - 2018	€37,339	€30,316	€293,913
C. 2011 - 2018	€32,433	€24,090	€306,402

ACCS recommends:

1. That the Moratorium on appointments be immediately lifted with a restoration of the funding of Clerical and Caretaking posts.
2. That the role of clerical officers be re-imagined to reflect the variety of the tasks associated with the role.
3. That the job description for clerical officers be expanded to include these areas of responsibility.
4. That the allocation of clerical/administrative support to schools be augmented.
5. That the pay scale and progression be examined to attract highly trained/experienced personnel to meet the role of senior clerical/administrative officer.
6. That the allocation of caretakers be restored to a level where schools can meet all their Health & Safety, Health & Hygiene, Repair & Maintenance obligations and expectations and facilitate the access to school facilities for our school communities.

The implementation of the figures as per the Blackstock Report 1999 as seen in the table below would provide opportunities to our schools to meet the challenges to deliver an education service that will support a modern economy developing the skills and talents of all of our people.

School Size	Schools >1000 students	Schools < + = 800 students	Schools <=500 students
Clerical	2.6	2.2	1.5
Caretaking	2.6	2.2	1.5

1. Introduction:

ACCS is the management body for the 96 schools in the Community and Comprehensive Sector. Since 2009 we have recorded the impact of the Moratorium on Clerical and Caretaking appointments in our schools.

We are grateful to the Joint Committee for the opportunity to present the evidence of these cuts on our schools. We also applaud the efforts made by our schools to deliver a quality service to the pupils and the communities in the face of these deficits.

- 1.1. The introduction of the moratorium on appointments of clerical officers and caretakers has seriously reduced the capacity of schools to meet the needs of students, teachers and parents. The burden has fallen ultimately on principals and deputy principals to cover the shortfall by incorporating basic tasks into an already overloaded work regime. This restriction was contemporaneous with an increase in clerical tasks and a redesign of the relationship between schools and the Department of Education and Skills in terms of the compiling, recording and transfer of data. It has also now coincided with enhanced requirements for the recording, management and storage of data due to the GDPR and the introduction of increased regulation associated with Procurement, RCT, FSSU, Child Protection and Garda Vetting which all have in turn multiplied the tasks requirements.
- 1.2. The loss of the budget allocation for clerical officers and caretakers has seen schools try to stretch an annual budget that is already depleted currently by 11% with the first restorative measure of 5% scheduled for the 2019/20 school year, to cover part-time clerical hours and contract cleaning, which in turn places additional strain on finances. A significant number of our schools cannot manage within the current budget allocation.

2. Research:

ACCS carried out research across our schools to quantify the impact on schools. The following narrative highlights evidence from Community and Comprehensive Schools as garnered in the research.

2.1. Evidence from our schools;

- "We have lost one full time caretaker and one secretary, yet our numbers have increased by over 300 pupils."
- "Huge burden placed on the pay budget. Almost entire SSSF budget now spent on additional part-time caretaker & part-time clerical officer. Cut backs in cleaning hours come into effect in May 2018 to preserve pay budget. Upkeep of school grounds and general service delivery to staff has suffered hugely in past 10 years."
- "The school cannot function without 2 full time clerical officers at a minimum. Everything is now done on the run, half done, delayed, or simply left undone. The amount of regulation and reporting imposed on schools makes a mockery of the "leader of learning" tag for principals. Cutbacks have undermined management and mean we make more errors and cannot give time to education."
- "A full-time caretaker has not been replaced. We have only 1 school secretary, a second secretary is funded by the SSSF but is only paid 3 hours per day as that is all school can financially support. We are under severe pressure to maintain secretarial

and maintenance services in our school and it necessitates overtime for the caretaker which as a school we cannot afford and we are under severe financial pressure, at times we struggle to pay the fortnightly wages."

- "Since the moratorium in 2010 we have not been able to balance our books (financially). The main reason for this has been down to hiring personnel to operate our office. We spend nearly all our SSSF on personnel to operate our office and our book rental system and library. If we were given a second allocation for a secretary we would begin to balance our books again. It is vital we can start the new year in a financially sound setting."

2.2. If we compare this narrative experience with what is recommended:

Formula for allocation of Clerical and Caretaking positions to Community and Comprehensive Schools.

School Size	Schools > 1000 students	Schools < + = 800 students	Schools <=500 students
Clerical	2.6	2.2	1.5
Caretaking	2.6	2.2	1.5

2.3. The comparison with recommended supports clearly demonstrates the deficit in Community and Comprehensive Schools. The moratorium in 2009 envisaged a pause in recruitment. In May 2014 DPER indicated that the moratorium was over. The position of ACCS is that the pause has now become institutionalised and despite the recovery of the economy, there is little if any sign of restoration.

3. Impact

3.1. This loss of clerical positions results in:

- Significantly increased workload for the remaining clerical officer and the Senior Management Team.
- The distraction for the Senior Management Team from essential tasks including leading teaching and learning and School Self Evaluation. This has been relentless.
- Inefficiency in managing administrative tasks, in a climate where accountability is expected.
- Poorer delivery of the Minister's agenda of improving school relationships with parents, building parent capacity and engagement.
- A reduction of the quality of the service to students, parents and staff. Very often schools are offline to parents for significant parts of the day.
- Schools are introducing a casualisation of employment through irregular part-time hours to try and meet needs. This is not in the best interests of the organisation and represents risk on several fronts. Schools are operating a range of ad-hoc provisions to support clerical and caretaking needs.

3.2. This loss of caretaking positions results in:

- School is not maintained to a proper standard.
- Delays in completing basic cleaning, maintenance and repairs with consequent health and hygiene risks.
- Loss of morale due to deteriorating infrastructure.

- Task overload for single caretaker who cannot work excessive hours. This is leading to frustration and burnout and putting pressure on facilitating extracurricular activities. Schools with substantial grounds no longer have a maintenance capacity.
- Schools not being available to local community on as regular a basis as before and thus a reduction in shared services. (Action Plan)

4. Consolidated Impact:

4.1. Research analysis also indicates:

1. Under the terms of the moratorium the supports available to manage and maintain schools were reduced while the tasks in schools have continued to grow.
2. The role of the principal in 2019 has evolved from the role held prior to the moratorium of 27 March 2009.
3. The accompanying reduction in the capital budget has seen schools unable to carry out basic repairs, maintenance and indeed cleaning.
4. Clerical and Senior Management are under increased pressure from increased workloads (e.g. induction, whole school evaluation, new management of information systems, significantly increased number of correspondence due to HSE, NEPS, EWO FSSU, PPod, Procurement, Child Protection, Governance, Revenue Audits.
5. The enhanced middle management structure will require clerical support.
6. The management of Junior Cycle has introduced further clerical and administrative requirements.
7. There has been a significantly increased range of correspondence to parents often left for the senior management team to produce and issue. At the same time the schools were being directed to increase consultation and engagement with parents.

5. Recommendations:

ACCS recommends: that the moratorium on appointments to clerical and caretaking appointments be ended and proposes:

1. That the allocation of clerical/administrative support to schools be augmented – refer to **Blackstock Report. (See Appendix 1)**
2. That the role of clerical officers be re-imagined reflecting the variety of the tasks associated with the role and that the job description for clerical officers be expanded to include these areas of responsibility.
3. That the pay scale and progression be examined to attract highly trained/experienced personnel to meet the role of senior clerical/administrative officer. **(See Appendix 2)**
4. That the allocation of caretakers be restored to a level where schools can meet all their Health & Safety, Health & Hygiene, Repair & Maintenance obligations and expectations and facilitate access to school facilities for our school communities.

6. Conclusion

6.1. The Action Plan for Education (2017) states:

"In this plan our high ambitions are matched by specific actions to deliver on them, across all parts of the education service. Actions are aimed at improving outcomes for the learners who depend on the service, at breaking cycles of disadvantage, at supporting teachers and institutions to continually improve, at building better links between education and the broader community, and at improving our systems on which we depend to deliver all this."

There is a requirement to reinvest in administrative and caretaking supports in schools. These supports will assist senior management in practical ways to lead and manage effective and efficient school organisations for the benefit of all learners in the school. Goal 3 of the Action Plan for Education stresses the need to provide

"ongoing practical support to the key people in the education sector is vital if we are to realise the ambitious objectives that we have for Irish education".

6.2. Parents and students are key stakeholders in the teaching and learning process and this is recognised in the Action Plan for Education. From admission to graduation the needs of parents and their students are many and varied and in order for the school organisation to be able to meet these effectively there must be in place a proper robust infrastructure to deal with administration. ACCS stresses the need to implement in full the staffing levels for administrative and caretaking supports as recommended by the Blackstock Report as far back as 1999. It is also important that all schools have a minimum of one Grade IV secretarial position within this allocation to employ personnel with the necessary skills to address the complexity that now exists in the administration of Community and Comprehensive Schools. ACCS stresses the importance to focus reinvestment in:

- Administrative and caretaking supports in schools.

6.3. This reinvestment needs to be accompanied with the immediate reversal of the 11% cut in direct funding in post primary schools if we are committed to meeting the ambitious goals of the Action Plan for Education and establishing the best education system in Europe within a decade. ACCS acknowledges the partial restoration of per capita funding scheduled for the commencement of the 2019/20 school year. However, this does not even bring per capita funding in Community and Comprehensive Schools back to 2008 levels.

Appendix 1:

The Blackstock Report, Department of Education and Skills, 1999.

The report:

- Outlined the difficulties in getting usable data.
- Highlighted the differences between sectors.
- Stated that a financial management model should be made available to schools to assist in achieving uniformity in presentation of school accounts.

ACCS has a very small but highly effective secretariat advising and supporting Boards of Management in the Community and Comprehensive sector for 96 schools with approximately 60,000 students.

Allocation is currently capped at a maximum of one clerical officer in each school. Working under the guidance of the Board of Management and the School Principal, the clerical officer in a Community/Comprehensive School is responsible for all administration tasks including Finance, HR administration, student administration and academic records, ICT administration, secretarial support to the Principal, administration with regard to communication/PR, procurement, general office administration and specific Board of Management administration.

The recommendations from the Blackstock Report include the following:

- Schools of 500 pupils: 1.5 Secretarial 1.5 Caretaking
- Schools of 800 pupils: 2.2 Secretarial 2.2 Caretaking
- Schools of 1000 pupils: 2.6 Secretarial 2.6 Caretaking

Comparison with the administrative supports in a 1000 + Pupil School Northern Ireland

In support of the school Principal, 2 Deputy Principals and 2 Senior Teachers, Sixth Form Supervisor the school has the following administrative support available.

General Manager	1
Executive Officer	3
Senior Clerical Officer	1
Senior Clerical Officer/Attendance	1
Caretaker	2
Building Supervisor	1
Technicians	6

Appendix 2:

Extract from Circular Letter 0073/2018 Revision of Salaries of School Secretaries and School Maintenance Staff in Community & Comprehensive Schools

PAY SCALES FOR SCHOOL SECRETARIES IN COMMUNITY AND COMPREHENSIVE SCHOOLS WITH EFFECT FROM 1 JANUARY 2019

Grade III:

Scale Point	Pre-1 January 2011 Entrants 01/01/2019	Post-1 January 2011 Entrants 01/01/2019
1	€ 25,517	€ 23,587
2	€ 26,293	€ 25,136
3	€ 27,422	€ 25,517
4	€ 28,556	€ 26,293
5	€ 29,691	€ 27,422
6	€ 30,513	€ 28,556
7	€ 31,603	€ 29,691
8	€ 32,689	€ 30,513
9	€ 33,460	€ 31,603
10	€ 34,537	€ 32,689
11	€ 35,621	€ 33,460
12	€ 37,662	€ 34,537
13	€ 37,662	€ 35,621
14		€ 37,662
15		€ 37,662
*Long Service Increment	€ 39,110	€ 39,110

* after 3 years satisfactory service at the maximum

Since 2009 there have been no appointments at Grade IV despite the increased complexity of the administrative tasks. (See Appendix 3 Job Description)

Grade IV:

Scale Point	Pre-1 January 2011 Entrants 01/01/2019	Post-1 January 2011 Entrants 01/01/2019
1	€ 30,212	€ 27,566
2	€ 32,285	€ 29,450
3	€ 34,049	€ 30,212
4	€ 35,595	€ 32,285
5	€ 37,086	€ 34,049
6	€ 39,102	€ 35,595
7	€ 40,560	€ 37,086
8	€ 42,042	€ 39,102
9		€ 40,560
10		€ 42,042
*Long Service Increment 1	€ 43,403	€ 43,403
**Long Service Increment 2	€ 44,771	€ 44,771

* after 3 years satisfactory service at the maximum

** after 3 years satisfactory service at the 1st Long Service Increment

Appendix 3

Proposed Job Description for a Clerical Officer/Administrator in Community and Comprehensive Schools

Reporting to: Principal

Job purpose: To support and provide financial, administrative and secretarial support to the Principal and SMT and work within the office management team.

The successful applicant should display evidence of capacity in a wide range of the following key responsibilities

Finance

- Prepare the payroll.
- Reconcile and prepare all revenue on-line returns.
- Administer payroll on OLCS.
- Monitor, control and reconcile all financial allocations to the school (e.g. main school budget, Home School Liaison, Free Book Scheme, Exam Fee Scheme, Special Technology Grants, Adult Education, Mock Exams, Practical Exams etc).
- Ensure all payment to the school are recorded, receipted, reconciled and lodged to the appropriate bank accounts.
- Collect rent for use of premises, enrolment fees, book rental fees, school trips etc.
- Check and ensure accuracy of trader's accounts, part-time teachers and teacher's claims forms, travel forms, franking machines and expenses for Board of Management members.
- Assist in preparation for yearend audit.
- Arranging payment of all invoices authorised for payment. Keep and record monthly petty cash payments.
- Monitor and control the school's cash flow.
- Prepare monthly/annual accounts (including Adult Education), bank reconciliation etc. in accordance with Department of Education and Skills guidelines. Provide reports as requested to principal.
- Prepare reports for the Finance Committee as required.
- Liaise with Financial Support Services Unit on financial matters and outsourcing companies regarding maintenance and other contracts. Manage ordering of materials in accordance with Frameworks.
- Lodge cash/cheques and manage online banking including online payments and transfers.

HR Administration

- Support the administration for the recruitment and appointment process for teachers, SNAs and other staff in accordance with the procedures, including placing advertisements, correspondence with candidates, preparing interview related paperwork and ensuring that the recruitment and selection process is documented.
- Prepare offer letters, employment contracts and new employee starter packs.

- Maintain a Staff List, including the Seniority List.
- Administer and assist with the organisation of staff training including updating, maintaining and recording all training activities completed.
- Update and maintain staff leave of absence and administer on-line OHS referrals.
- Provide monthly/quarterly sickness absence reports for the Principal.
- Ensure all staff files are accurately and securely maintained.
- Manage school calendar and co-ordination of SMT diaries.

Student Administration and Academic Records

- Manage the student database and prepare DES October Returns, Systems Report design and backups.
- Administer and prepare documentation in connection with new admissions, including communication with parents, subject option forms, booklists and preparation for Assessment Open Day.
- Administer and assist with the scheduling and organisation of parent teacher meetings for all year groups.
- Assist with the organisation and administration of Student Award Ceremonies/Graduation Night and other events including providing information to parents and producing award/graduation certificates for students.
- Produce booklists for each year group and administer the School Book Grant Scheme.
- Assist with school journals, including Transition Year.
- Prepare and issue In-House Student Assessment Reports for each Year Group. Issue reports to Year Heads for signing, copying and posting.
- Prepare statistics for Year Heads in relation to in-house exam results.
- Prepare statistics for Year Heads of State Examination Results and liaise with the State Examinations Commission regarding state examination issues.
- Prepare student attendance reports for Year Heads and maintain on-line returns to TUSLA.
- Provide administrative support for school extra-curricular and fundraising events (e.g. Plays, Musicals, Sport, 5K Fun Run, etc.)

ICT

- Maintain the student database management systems (PPOD Facility Admin Scheduler), including the continuous maintenance of teaching groups/timetable changes etc.
- Apply Data Protection Policy requirements in the maintenance of all records.
- Provide support with the maintenance of the school website.
- Liaise with relevant software/hardware support agencies in developing new systems.

Secretarial Support to the Principal

- Provide secretarial and administrative support to the Principal in his/her role as Principal and Secretary to the Board of Management. Manage the Principal's diary.
- Maintain on behalf of the Principal all confidential matters relating to the administration and management of the school and operate secure filing systems.

- Provide assistance with the preparation for the Principal's Report for the Board of Management and the Principal's Report for the PTA.
- Provide administrative support re: Emergency Works Scheme, Summer Work Scheme and Sports Hall etc.
- Prepare grant applications to various agencies.
- Liaise with State Claims Agency as appropriate. Maintain Accident Report Forms and Claims Form (Pupil Personal Accident) for insurance purposes.

Communication/PR

- Assist with producing the Year Book/School Journal and School Information Booklets.
- Send texts to parents/guardians, Board members and staff as directed by the Principal.
- Control all incoming/outgoing school email on the general email account.
- Liaise with outside agencies, local primary schools, Youth Reach, other 2nd level schools, DES, TUSLA, sporting organisations and others.

Procurement

- Maintain school order books, acquire tenders, and submit requisitions to Principal for approval.
- Liaise with School's Procurement Unit on procurement matters.

Administrator to the Board of Management

- Deal with all correspondence for the Board. Assist the Principal with the preparation for Board of Management meetings. Record minutes of the Board meeting if requested.
- Submit copies of the BOM meeting to the DES and Board Trustees.

General Office Administration

- Cover reception as and when required.
- Manage the diary for the senior management team.
- Organise catering on Staff Days or for DES/guest visits.
- Ensure all correspondence is passed to relevant personnel effectively.

Person specification

- ✓ Knowledge and experience of accounts software package(s).
- ✓ Strong IT skills particularly Excel and MS Office package.
- ✓ Experience of managing budgets and preparing financial reports.
- ✓ Ability to communicate well (both written and oral), including with staff, parents and students.
- ✓ Ability to complete tasks to deadline.
- ✓ Well organised with experience in developing efficient administrative systems.
- ✓ An understanding of working in a school environment.
- ✓ Strong interpersonal skills, emotional intelligence and affinity with children.