

# Special Needs Parents Association

## Presentation to Joint Committee on Education and Social Protection on Proposed New Model for Allocating Teaching Resources for Students with Special Needs

8<sup>th</sup> October 2014

### Introduction

The Special Needs Parents Association is a voluntary registered charity run by parents for parents which exists to support all parents of persons with special needs and disabilities irrespective of age or diagnosis, by striving on a national level for improved treatment, education, welfare and acceptance for our children. Since its establishment in 2010, SNPA has been actively involved across Government Departments and with other agencies and organisations to further our mutual goals.

In a previous presentation to the Joint Committee on Education and Social Protection on the 7<sup>th</sup> November 2012, SNPA referred to the current Resourcing model and its inadequacies *“The special educational resource allocation system administered by the NCSE under Department of Education policy is currently based on diagnosis. SNPA would like to see an alignment of the model of special education resource allocation with the needs-based approach being proposed in the area of disability service provision”*.

In 2013 following the consultation on special education provision and subsequent publication of the NCSE report *‘Delivery for students with special education needs- A better and more equitable way’* in 2014, SNPA was again invited to participate in a consultation on a New Model for Teaching Allocations on behalf of our members whose children span the broad spectrum of disabilities and special educational needs. We are encouraged by the development of such a proposed new model and support it in principal as it reflects much of the input of SNPA members who contributed to our verbal and written submissions to the NCSE.

The proposed model is complex in so far as it is a whole new vision for special education in mainstream schools and we appreciate that it will take some time for stakeholders including parents and public representatives to gain an understanding of what the overall vision as it is incomparable to the current system of which many inequities have been identified due to its prescriptive nature.

Notwithstanding the potential of a new model for allocating additional teaching supports and the increase in the number of resource teaching posts, the overall provision of hours in relation to the increase in the number of children qualifying for resource teaching supports over the past few years has led to a 15% reduction in resource teaching hours across the board since 2011. The Special Needs Parents Association cannot stand over a new model whereby the reduced pool of resources is seen as a baseline from which the model will be implemented from and the 15% reduction must be addressed in the upcoming budget. As the implementation of the model will involve a major change in how teaching supports will be delivered and a shift towards self-management of those supports in school, educators, parents and pupils must have assurance that the overall pool of resources will be available to indeed deliver a system to meet the educational needs of children as presenting and that children with learning difficulties at the milder end of the spectrum will not lose out long-term

due to pressure as a result of historic reductions to special teaching supports which have not been reinstated.

The full implementation of the Education for Persons with Special Educational Needs (EPSEN) Act 2004 has not been realized a decade on, thus undermining the once envisaged framework of rights for children with special needs. SNPA would request that the Department of Education set out a timeline and costings for the full implementation of outstanding parts of the Act and that the development and implementation of the new model will be in line with the Act with particular reference to Individual Educational Plans.

The following observations are based on feedback from parents about the NCSE Working Group Report- 'Delivery for Students with Special Educational Needs'. SNPA is fortunate to have a very diverse profile of parent members, amongst which there are also parents who work within the current special education system as well as having personal experience of supporting their own child through the education system and parents who have detailed knowledge of the educational and social challenges associated with a broad range of learning difficulties and disabilities.

### **Allocation of additional teaching supports to schools**

The current methods of allocating teaching supports to schools and individual children have served many children well, but it is recognised that anomalies and exclusions exist when using a system of allocations based on diagnosis and numbers of pupils and teachers without regard to the need for such allocations on an individual and school level. SNPA supports the implementation of a model based on needs and in line with reforms currently ongoing in the Children's Disability Services '*Progressing Disability Services for Children and Young People*', but would add caution that any new model be properly tested before fully implementing and that a further and final consultation period be planned for a later date once work on outstanding finer details in the model framework have been completed.

### **Observations on proposed new model**

- **School educational profile**

-Complex special educational needs

Descriptors for complex special educational needs need to be robust. The current descriptors of the NCSE Working Group Report use the word "*extremely*" on two occasions and this would need a definition in order to have transparency and a clear understanding of what level professionals and parents identify behavior in particular, as extreme. It is our understanding that the NCSE, NEPS and HSE are currently consulting with each other on the development of clear descriptors to identify students with complex educational needs and these should be subject to a further consultation period once drafted.

-Standardised test results

Parents have indicated concern over the use of standardized test results in developing a school profile. This comes from experience of their children who have high STEM scores 8-10, but have significant impairments requiring teaching and other supports. The NCSE Report (pg40-41) indicates that many caveats were considered and Recommendations 7-8 have addressed this concern. The Department must ensure that resources are available for accessible teacher training and that NEPS or the proposed ISS have the staffing resources to support schools to process and analyse test results in a timely manner and minimizing the administrative burden on teachers.

-Social context of school

While data is available through centralized sources and CSO figures, obtaining personal socio economic information required from individual parents may be a cause for concern. Parents need to be informed by schools as to the purpose of collating such data, where will it be stored and who is privy to the contents. Some parents may be reluctant or suspicious of sharing such information with schools and need reassurances that it will not be used for any other purpose other than the accruing of general statistical information and personal details will not be disclosed in the process.

Once the weightings model has been developed and piloted, a further consultation should be sought from stakeholders.

- **Baseline component**

Given the 25% prevalence rate of special educational needs at mid primary level has been established through research in an Irish context, the baseline component to schools may need to be examined and adjusted following a paper based examination of random schools of various sizes to ensure that bandings of baseline allocations are narrow enough to ensure that the allocation is on a scale increasing with pupil numbers. There needs to be some consideration for small schools who while may be seen to have the advantage of low pupil numbers, they have to manage multiple classes/curriculum within the one room and may have several pupils not deemed to have complex learning needs, but collectively have a greater impact than may be evident by numbers input in a formula.

Schools that face a significant reduction in support teacher numbers as a result of calculating the Baseline Component and School Profile should be allowed a transition phase over a reasonable timeframe to allow for staff adjustment to the reduced numbers in line with pupils needs.

## **Deployment/utilization of additional teaching resources by schools**

### **Assessments**

Teachers need to have adequate support and training around the assessment tools required to identify learning needs in the absence of a diagnosis which could provide some indicators as to the strategies suitable for each individual child. One of the challenges in the current system is the difficulties and delays in obtaining a diagnosis in order to subsequently apply for additional teaching resources. This is predominantly as a result of the severe shortage of healthcare professionals in children's disability services and the future move towards needs based service provision in children's disability services. SNPA while advocating for a needs based system, is concerned that teachers and parents will have little support in trying to establish a diagnosis, where such a diagnosis may have an impact on the management and planning of meeting the child's needs.

The Department of Education & Skills also needs to consider how moving away from a diagnosis led system in relation to additional teaching supports will impact on any other schemes the Department administers where a diagnosis may still be a prerequisite and reports from healthcare professionals are still required, such as for admission to preschool and units and categories of special classes.

### **Monitoring of outcomes**

SNPA support the monitoring of outcomes in order to validate the quality and level of inputs in each school and for each individual pupil with special educational needs. Current focus can regularly be on the level of inputs/quantum of supports rather than ensuring that the

supports are effective and of benefit to the pupil with special educational needs. Schools need to be supported with appropriate and universal IT systems for recording data and receive training and support with measurement tools for the recording of Independence and Happiness related outcomes as well as the other parameters identified in Table 2 of the report.

SNPA has consistently made representations for Individual Educational Plans to be mandatory not optional, for all pupils with special educational needs. Teachers should be appropriately trained and have guidance and more importantly some level of oversight for quality purposes in the process of drafting IEPs. In the absence of the full implementation of EPSEN Act 2004, the identification of IEPs as being international best practice does not always translate into best practice in schools. Parents' experience of IEPs is varied and indicators that parents are not directly involved other than to sign off or refusal to conduct an IEP meeting and plan is disappointing. The variation in quality of IEPs is also cause for concern and would be ameliorated with further training being readily available for teachers. IEPs are a valuable tool for setting out goals and strategies to meet them and would contribute to the monitoring of outcomes when used appropriately.

Recommendation 25 makes reference to annual reporting on how additional resources are deployed, progress and outcomes and Recommendation 24 will place the responsibility with the NCSE for external oversight and linking of additional resources to the '*Learning plan process*'. SNPA welcomes the linkage, but would be cautious that the quality or lack of quality of the plans does not prejudice the sanctioning of additional resources but highlights the possible need for further guidance for the teaching staff. SNPA would also like clarification on the use of the term 'Learning Plan' and how and why there is a deviation from the more frequently used term 'Individual Educational Plan'? The concept of a 'Personal Pupil Plan' has also been introduced into the dialogue around supports linked with evidence of plans, "*The deployment of all additional individualised supports, both teaching and non-teaching, which are provided to support children with special needs should be linked to a personalised planning process for the pupils for whom the application is being made*". Are teaching and other professionals expected to produce two separate plans rather than an integrated single plan incorporating both educational and care needs where identified? SNPA is querying whether the use of two separate terms is moving away from the concept of an Individual Educational Plan as set out in the EPSEN Act which is not yet fully ratified..

### **Inclusion Support Service**

SNPA have supported the concept of one special educational body by the amalgamation of NCSE, National Educational Psychology Service, Special Educational Support Service (SESS) and the National Behavioral Support Service (NBSS). Any savings by the amalgamation of the services should be frontloaded into providing more qualified support staff. We would also support and encourage a feasibility report into the development of the ISS into geographical based teams to support schools in their region to include; facilitating and providing training for teachers and SNAs where appropriate, actual contact time in schools where exceptional circumstances have been identified and a broader and specialist team approach where necessary to support the school to avoid a breakdown in the pupils placement.

The SENO or an identified ISS Liaison to the school should have the ability/remit to coordinate such specialist interventions where required and liaise with the Disability Network Teams and Child and Adolescent Mental Health Services with parental consent, in order to have a coordinated approach to preventing and providing solutions to complex scenarios that may lead to a child or adolescent no longer able to attend school.

The ISS must have powers to compel a school to implement team recommendations to prevent cases where the lack of implementation leads to a breakdown in school placement

and powers to enroll a child where 'soft barriers' in a school or school enrolment policy are apparent, providing placement is appropriate for the child and in agreement with parents.

### **Responding to Exceptional circumstances**

The response to exceptional circumstances should be timely and a clear pathway developed for school and parents as to what that pathway involves as indicated in Recommendation 22 citing the Inclusion Support Service and our own recommendations in the above section on the ISS.

### **Independent Appeals**

Independent Appeals (Recommendation 13) would typically suggest that an external and independent body other than the Department of Education or ISS would administer an appeals system such as is the case with social welfare appeals Social Welfare Appeals Office.

SNPA have previously made recommendations for the establishment of an Independent Educational Appeals Office that would have responsibility for dealing with appeals across the education system including and not exclusive to appeals for Assistive Technology, Special School Transport, July Provision, Home Tuition Grant, SNA Scheme, Special Teaching Allocations, School Exclusions (Section 29), Examination supports and any other relevant scheme that the Department administers. As with any independent appeals system, the local process would have to be initiated and followed through before an appeal could be lodged with such a body.

### **Summary of Recommendations**

- SNPA would request that the Department of Education set out a timeline and costings for the full implementation of outstanding parts of the EPSEN Act 2004.
- In the absence of full implementation of EPSEN Act 2004, Individual Educational Plans to be a mandatory requirement for every child with special educational needs
- The overall provision of hours in relation to the increase in the number of children qualifying for resource teaching supports over the past few years has led to a 15% reduction in resource teaching hours across the board since 2011. The 15% reduction must be addressed in the upcoming budget to restore the pool of resources on which to implement the new model of teaching allocations.
- Once the weightings model and other outstanding details of the model has been developed and piloted, a further consultation should be sought from stakeholders.
- Schools that face a significant reduction in support teacher numbers as a result of calculating the Baseline Component and School Profile should be allowed a transition phase over a reasonable timeframe to allow for staff adjustment to the reduced numbers in line with pupils needs.
- The Department of Education & Skills must give consideration to how moving away from a diagnosis led system in relation to additional teaching supports will impact on any other schemes the Department administers where a diagnosis may still be a prerequisite and reports from healthcare professionals are still required, such as for admission to preschool asd units and categories of special classes.

- SNPA is advocating for the development of one special educational body 'The Inclusion Support Service' (ISS), formed by the amalgamation of the National Council for Special Education (NCSE), National Educational Psychology Service (NEPS), Special Educational Support Service (SESS) and the National Behavioral Support Service (NBSS). The establishments of geographical based cross professional ISS support teams that can work directly with/in schools where necessary, liaise with schools on complex cases, provide accessible training for teachers and Special Needs Assistants, administer schemes related to special educational supports and link with Network Disability Teams.
- The ISS must have powers to compel a school to implement team recommendations to prevent cases where the lack of implementation leads to a breakdown in school placement and powers to enroll a child where 'soft barriers' in a school or school enrolment policy are apparent, providing placement is appropriate for the child and in agreement with parents.
- The response to exceptional circumstances should be timely and a clear pathway developed for school and parents.
- SNPA have previously made recommendations for the establishment of an Independent Educational Appeals Office not dissimilar to the Social Welfare Appeals Office set up on a statutory basis that would have responsibility for dealing with appeals across the education system including and not exclusive to appeals for Assistive Technology, Special School Transport, July Provision, Home Tuition Grant, SNA Scheme, Special Teaching Allocations, School Exclusions (Section 29), Examination supports and any other relevant scheme that the Department administers. As with any independent appeals system, the local process would have to be initiated and followed through before an appeal could be lodged with such a body.

## Conclusion

In conclusion, the process of change is always challenging for all stakeholders and needs careful planning, management, and in particular monitoring of successful outcomes and possible unforeseen unintended consequences. SNPA would like to see a periodic review and reporting following the implementation of the agreed model at a five and ten year timeframe.

A model based on needs is laudable and most welcome, but providing the myriad of elements to meet those needs spans across policies and budgets in education and health and should not be considered nor addressed in silos.

It has to be firmly stated that successful educational outcomes for children with special needs are often intrinsically linked and dependent on the provision of therapeutic interventions to support their development, particularly in relation to the ability to communicate and support positive behaviors in an educational setting. Both of these are often the greatest barriers to reaching a child and unlocking their true potential and sometimes it is not the teacher that holds the keys. Following on from a recent Inclusion Ireland damning report on the lack of Speech & Language Therapy provision for children, SNPA urges the committee to address this issue with the relevant Ministers and provide our educators and children with the supports that they need to optimize our children's potential and change their future pathways.