

Call for consultation
Department of Education and Skills
Statement of Strategy 2016-2018

As part of the Government's first 100 days Programme, we are starting the process of developing a new Strategy for Education and Skills 2016-2018.

This Strategy will be informed by the Government's *Programme for a Partnership Government* and aims to advance the transformation of the education system to support the principles of the Programme in developing a strong economy so as to support fair and compassionate society.

The Government's basic vision is to use our economic success to make people's lives better.

No area of the Government's work is more vital to this mission than education. In no area of the Government's work do we have more capacity to improve our society and make people's lives better – most importantly, for the children, students and life-long learners who depend on our services. I look forward to working with you to help achieve that.

The Programme sets out the following eight areas of priority:

1. Prioritising Early Years
2. Tackling Disadvantage
3. Diversity and Choice for Parents
4. Promoting Excellence and Innovation in Schools
5. Promoting Creativity and Entrepreneurial Capacity in Students
6. Making Better use of Educational Assets within Communities
7. Special Needs Education
8. Meeting the Skills Needs of the Future

The Government has committed to producing a three year strategy for the Department in the first 100 days and a framework for measuring its progress in consultation with stakeholders. Accordingly, I am launching this stakeholder consultation to gather your views on the development of the new strategy so that you can input into its development. The consultation paper poses a series of questions for your consideration. You can, of course, provide a submission in a different format if you wish.

In order to assist you in your considerations, please note the following documents:

[A Programme for a Partnership Government](#) (chapter 10 Education)
[Statement of Strategy 2015-2017](#)

The consultation paper is available to download [here](#)

The closing date for submissions is **Wednesday 8th June 2016**

[I want to hear your views and I thank you for assisting in this important work.](#)

If you have any queries in relation to this process, please contact Siobhán Cullen at (01) 8892032 siobhan_cullen@education.gov.ie or Eimear Gallagher (01) 8892200 eimear_gallagher@education.gov.ie

Richard Bruton, T.D.
Minister for Education and Skills

Submission by National Federation of Voluntary Bodies providing services to People with Intellectual Disability

The National Federation of Voluntary Bodies is a national umbrella organisation for voluntary/non-statutory agencies that provide direct support services to people with intellectual disability in Ireland. National Federation members provide services throughout the twenty-six counties in both urban and rural areas. In all, the National Federation comprises some 60 affiliated organisations who between them account for in excess of 85% of this country's direct service provision for people with intellectual disability. National Federation members employ a wide range of professional disciplines providing services and supports to over 25,000 children and adults with intellectual disability. The National Federation of Voluntary Bodies Vision Statement for Intellectual Disability in Ireland for the 21st Century, which is endorsed by its Board and General Assembly, outlines the vision as:

"Being supported to live a life on one's own terms – Above all people have a deep and rooted desire to belong, to be in relationship, to live within the intimacy and security of their family and friends, to be included in the greater life around them and all its attendant possibilities for hope and fulfilment and to do so, to the greatest extent possible, on their terms. The implications of this simple truth will determine our actions on behalf of all citizens with Intellectual Disabilities"

The five core principles to drive this process are: Self Determination, Friendships and Relationships, Inclusion, Equity, and Equal Citizenship¹.

The National Federation of Voluntary Bodies warmly welcomes the opportunity to provide feedback in response to the Department of Education and Skills call for consultation on its Statement of Strategy 2016-2018.

The principles of fully inclusive education are enshrined in the UN Convention on the Rights of Persons with Disabilities (UNCRPD):

"1) States Parties recognize the right of persons with disabilities to education. With a view to realizing this right without discrimination and on the basis of equal opportunity, States Parties shall ensure an inclusive education system at all levels and life long learning directed to:

- a. The full development of human potential and sense of dignity and self-worth, and the strengthening of respect for human rights, fundamental freedoms and human diversity;*
- b. The development by persons with disabilities of their personality, talents and creativity, as well as their mental and physical abilities, to their fullest potential;*
- c. Enabling persons with disabilities to participate effectively in a free society*

[....]

5) States Parties shall ensure that persons with disabilities are able to access general tertiary education, vocational training, adult education and lifelong learning without discrimination and on an equal basis with others"

Article 24, UNCRPD. ²

¹ National Federation of Voluntary Bodies Providing Services to People with Intellectual Disability (2009) *Vision Statement for Intellectual Disability in Ireland for the 21st Century – Discussion Document*, and Service Plan 2016 are at the following links: [Vision Statement for Intellectual Disability in Ireland for the 21st Century](#); [National Federation of Voluntary Bodies Service Plan 2016](#)

² <http://www.un.org/disabilities/convention/conventionfull.shtml>

The Programme for Partnership Government sets out the intention of the Government to ratify the UNCRPD as a priority, (p70). The National Federation fully supports this aim and the rights of all citizens to access educational opportunities on an equal basis and without discrimination as set out in the UNCRPD, and urges ratification of this treaty without delay.

Questions

How well does the Education service meet the needs of children and students?

1(a) What improvements can be made within existing resources

Principle 5 of the National Council for Special Education's policy advice paper "*Supporting Students with Special Education Needs in Schools*" (2012) states:

"Available resources are used to maximum effect to drive improved outcomes for children; State services work together to achieve this."

At the present time one of the key difficulties for students with intellectual disabilities in both mainstream and special schools is a lack of a coordinated whole-of-Government approach impacting in a range of ways on their participation in educational opportunities. For example, where there are nursing supports required for children and students to participate in education, there is currently a lack of agreement about whether this should be funded through Health or Educational spending, leading to a lack of clarity and a lack of appropriate resources being allocated. Consequently students whose medical needs require nursing support in order to attend school or college are experiencing absences or reduced attendances when the required nursing supports are not in place. Students who require nursing supports on transport in order to be able to travel to school are also experiencing a similar lack of cross-departmental agreement.

Research by the National Council for Special Education highlights the lack of a consistently implemented coordinated approach:

"Children with particular disabilities and/or special educational needs may require ongoing access to therapeutic services, including speech and language therapy, occupational therapy, physiotherapy, clinical psychology and child and adolescent mental health teams. While there are examples of sustained co-operative practice between health and education professionals (HSE, 2013), serious concerns have been expressed about the uneven nature of provision throughout the country, limited access and long waiting lists (HSE, 2009; NCSE, 2013).

(Rose et al, 2015)³

The experience of difficulties as outlined above in relation to cross-departmental approaches has been confirmed in a recent internal consultation with National Federation member organisations (April 2016). Through this consultation issues raised included a lack of clarity in relation to Departmental responsibility for nursing support for students with ID and complex medical needs to attend school along with issues in relation to continuity of support at transition from special school to school-leaver provision, and supports for children with significant behavioural support needs. In relation to the transition from special school for children with the most complex level of need, for example, children who were receiving 2:1 support on 31st July through the Department of Education, have received an allocation of less than 1 WTE on 1st August in spite of no change occurring in their support needs.

³ Rose R., Shevlin M., Winter E., O'Raw P. (2015) Project IRIS – Inclusive Research in Irish Schools. A longitudinal study of the experiences of and outcomes for pupils with special educational needs (SEN) in Irish Schools. National Council for Special Education, Research Reports No:20

In relation to behavioural supports the following example was provided in June 2016 for a student with co-morbidity diagnosis (i.e. intellectual disability and mental health) and extreme behaviours that challenge - to the extent of serious injury to staff and potential injuries to other pupils (thankfully averted). Dilemmas arose between the school authorities (Department of Education and Skills) and the Patron (HSE funded) as to pursuing the appropriate services for the pupil and indeed, when the appropriate services were identified as to who's overall responsibility it was. The child and family have been left distraught and appear to 'fall between the two'.

Similarly, for school-leavers and mature students with ID there is a need for a collaborative approach between the Department of Health and the Department of Education and Skills to ensure that funding provided to a person with an intellectual disability can be flexibly employed to provide support for their participation in mainstream 3rd level education, where that is the preference of the individual.

Improved cross-departmental working is required to ensure that the needs of children and students at all levels with special educational need are fully catered for by a whole-of-Government approach.

Enhanced collaboration between Department of Education and Skills; Department of Health; Department of Children and Youth Affairs; and the Department of Transport, Tourism and Sport is essential to ensuring equality of access to education, and meaningful inclusion and integration for children and students with intellectual disabilities. There is a particular need for cooperation in supporting participation in education for those who have significant medical needs. It is also vital that there is engagement between the National Educational Psychological Services, the Inclusion Support Service, the National Council for Special Education and the HSE to coordinate the response to children with a range of complex needs, including where there is a need for positive behavioural support. There needs to be clarity of role for each agency involved to ensure that families are well supported.

1(b) What improvements can be made through new provision

- On page 86 of the Programme for Government a range of cross-departmental measures including HSE Speech and Language Therapists are listed as part of an additional €500 million investment in education. This additional investment should also include nursing supports to allow children with complex medical needs to attend school (and where necessary provide support on school transport) so that children who have significant medical needs do not continue to be excluded from their educational entitlement, or have reduced days of inclusion in school due to a lack of essential nursing support, and positive behavioural supports.
- There is a need for further focus on transition planning for children moving beyond secondary school. Post-primary resource teachers need training in supporting families through the transition period and the Inclusion Support Service may have a role in providing training for support teachers in this role. There is a need for clarification on the role of the support teacher, school and wider support services in planning for this transition. Additional resources may be required to address transition planning and there is a need for clear planning, process, roles and a timeline within the school cycle for each child to have planning in place. The recent publication in 2016 of transitional guidelines for schools and for parents/guardians by the NCSE is a welcome development.
- Under Goal 3 of the Statement of Strategy 2015-2017 it is stated that:

“We will further develop policy and programmes to support learners with special educational needs and disabilities in participating and progressing across the continuum of education”; and “We will promote access to higher education for disadvantaged groups and put in place coherent pathways from second level education, from further education and training and other non-traditional entry routes.”

In order to ensure equality of access for people with intellectual disabilities who wish to access inclusive 3rd level education (including in universities, institutes of technology, further education and training schemes) there is a need for further support and funding provision so

that inclusive individualised programmes such as the ‘Going to College’ pilot project which took place in the National University of Ireland, Galway; and the Inclusive Learning Initiative currently underway in Maynooth University can be made available to all students who wish to access 3rd level education. The ‘Going to College Project’ and the Inclusive Learning Initiative have provided significant evidence of reciprocal benefit to the educational institute and the student included. Students with intellectual disabilities require their funding supports to be flexible and eligible to be used for supporting attendance at education settings, whilst universities and other third level institutions must receive funding supports for students with ID, to provide equality of access since these supports are provided for students with other kinds of disability.

Comment on work currently being undertaken by the Department in your area of interest and/or expertise. (What are we doing well, what could we do better)?

- The National Federation warmly welcomes the National Council for Special Education’s proposed model for Allocation of Teaching Resources for Students with Special Educational Needs, and its focus on needs-led rather than diagnosis-led allocation of resources. The focus on multi-year funding within this model is also welcomed, as is the focus on meaningful inclusion in mainstream classes and the whole-school approach rather than a withdrawal model. The National Federation calls for implementation of this policy as a matter of priority.
- There is a need for greater focus on how the inclusion of parents in a partnership approach can be effectively put into practice in line with international best practice and the EPSEN Act. Collaborative working with families should be enhanced.

How should success on achieving our strategies be measured.

A 2015 National Council for Special Education research report revealed, that in spite of substantial progress made in recent years, significant barriers remained in the development of inclusive learning environments up to second level, including

“inadequacy of current assessment procedures to access resources; limited access to therapeutic services; insufficient teacher knowledge and expertise; inconsistencies in development and implementation of IEPs; exclusionary clauses in school enrolment policies”

(Rose et al, 2015⁴).

Success in achieving the strategies should be measured, amongst other ways, by full equality of access to all levels of education – from preschool to 3rd level, to all citizens, including people with intellectual disabilities.

People with intellectual disabilities and families should be involved in all local, regional and decision making mechanisms that contribute to the development of national policy strategies and frameworks, including those developed within the Strategy being drawn up by the Department of Education and Skills

⁴ Rose R., Shevlin M., Winter E., O’Raw P. (2015) Project IRIS – Inclusive Research in Irish Schools. A longitudinal study of the experiences of and outcomes for pupils with special educational needs (SEN) in Irish Schools. National Council for Special Education, Research Reports No:20

Any other observations that you would suggest the Department should consider in the formulation of our strategy for education and skills 2016 - 2018

A focus on life-long learning; equality of access and inclusion; the importance of realising and maximising potential; and education as a supporting feature of living a 'good life' should receive central focus alongside the economic considerations of education in terms of employment and job opportunities. This will help us to build a more inclusive, citizen-led society. Inclusive education at every level reflects the values of an inclusive society, and vice versa.

The National Federation warmly welcomes the Programme for Government's focus, on page 5, on improving the lives of people with disabilities:

*"As part of our commitment to equality of opportunity, we will support people with disabilities in **maximising their potential, by removing barriers which impact on access to services, education, work or healthcare.** A particular focus will be placed on **supports at key transition points** – going to school, progressing to further training or education, commencing employment, or moving in to a new home. In recognition that **personalised budgets provide an individual with more control in accessing services, giving them greater independence and choice, we will devolve budgets to the person** so they may shop beyond traditional service providers to better fit their needs."*

A Programme for Partnership Government, 2016; p.5

In the formulation of a Strategy for Education and Skills 2016-2018 we strongly recommend that the vision of the Programme for Government in relation to supporting people with disabilities as set out above, is a key driver of the Strategy, and that the full participation of people with intellectual disabilities is a priority within the achievement of this vision, so that the aim set out on page 10 of the strategy can be realised:

"We want an Ireland where everybody is given the opportunity to succeed, where nobody is left behind"

A Programme for Partnership Government, 2016; p.10

Prioritising Early Years

What would you consider to be the priority actions and outcomes in this area?

- It is essential that the appropriate supports and resources are put in place to ensure that children with special educational need can fully participate in the early years educational opportunities available to all children, including the Early Childhood Care and Education scheme.
- An issue identified by our member organisations has been the funding of special pre-schools, some of which have experienced sharp decreases in funding over recent years. For some children, the role of the special pre-school can be seen to benefit the development of skills and capacities that facilitates children attending mainstream schooling and in the longer term can lead to reduced disability funding in later life as potential is maximised and the need for support reduced. Our members have been asked in some cases to take responsibility for the running of such special pre-schools, but the funding has been the source of dispute in relation

to Departmental responsibility, leaving our members without adequate and appropriate resources to maintain this provision.

Diversity and Choice for Parents

What would you consider to be the priority actions and outcomes in this area?

- In order that a child can attend their local school there is a need to ensure consistent implementation of policy across all schools so that the promotion of meaningful inclusion of children with disabilities and the implementation of whole school approaches ensures that all schools take responsibility for full inclusion and that there is not a development of schools with a particular expertise/focus on Special Educational Need. It is vital that families of children with disabilities have access to the full range of educational options available in their area.
- Under Goal 3 – Supporting Inclusion and Diversity, one of the outputs listed is “*Progress on the divestment of schools and the establishment of new schools to provide a greater diversity of school types*”. This Goal should also include engagement by the Department of Education and Skills with patrons of Special Schools to examine a range of issues that require consideration, including clinical governance, patronage of special schools in the context of mainstreaming policy, equality of access for children with complex medical needs, and supports for children with complex behavioural support needs. The National Federation of Voluntary Bodies would be happy to liaise with the patrons of Special Schools within its membership to facilitate such engagement.

Promoting Creativity and Entrepreneurial Capacity in Students

What would you consider to be the priority actions and outcomes in this area?

The Programme for Partnership Government discusses, on page 91, the importance of focusing on the future needs, abilities and capacities of students. For young people with intellectual disabilities it is vitally important that expectations are set high from the outset so that the full potential of the person can be realised. The practice of developing and maintaining socially valued roles (as espoused in Social Role Valorization (SRV) theory and practice) across all domains of life including through education has been shown to have transformative outcomes in the lives of people with disabilities, demonstrating that low expectations have long been the source of limited life experiences and poor quality of life. Work undertaken by the National Federation members and many others has provided clear evidence in an Irish context that an individually focused, strengths-based approach will ensure that the creativity and capacity of people with disabilities is much enhanced and provides people with opportunities for meaningful participation in the workforce and in community life as valued and active citizens. Thus, the educational approach to inclusion of people with intellectual disability should be informed by an SRV approach.

An example of this kind of approach in action can be found at the following link: <http://www.fedvol.ie/fileupload/Publications/Next%20Steps%20-%20The%20Journey%20So%20Far.pdf> or by contacting the National Federation (091 792316) or Genio at www.genio.ie

Making Better use of Educational Assets within Communities

What would you consider to be the priority actions and outcomes in this area?

There is a lack of available space accessible to wheelchair users in many communities. Where such spaces exist in educational settings, particular consideration should be given to providing opportunities for mainstream community activities that are inclusive of people with disabilities to take place in the evening-time or at weekends. A mapping of the available accessible facilities would be welcomed so that community groups could be informed about potential opportunities.

Special Needs Education

How should progress on Special Needs Education be measured?

- A review process should be put into place to monitor implementation of the NCSE proposed model for Allocating Teaching Resources and to evaluate outcomes for learners with special educational needs.
- 3rd level educational institutions should be required to demonstrate that they are operating on the basis of full inclusion for all, including learners with intellectual disabilities. Evidence from fully inclusive 3rd level pilot programmes carried out in Ireland (such as 'Going to College' in NUIG and the Inclusive Learning Initiative in Maynooth university) has demonstrated clear benefits to the learner, peer students and the institution through inclusion of students with intellectual disabilities. In order to facilitate access for students with ID, a flexible approach to the level achieved on the QQI framework must be adopted, as well as in regulation relating to full/part time registration and flexibility for students with intellectual disability to complete programmes over a longer time-frame if necessary.

What would you consider to be the priority actions and outcomes in this area?

- Early implementation of the NCSE's proposed model for Allocating Teaching Resources for Students with Special Educational Needs should be prioritised.
- There needs to be recognition across all educational levels that people with disabilities – and people with intellectual disabilities in particular – have a right to access mainstream education and training. This is particularly relevant in the case of community-based educational programmes. Further work to ensure an understanding that all citizens in our society have a right to access education on an equal basis may be required for staff in mainstream settings as feedback from our member organisations supporting people who wish to access mainstream education and training has indicated that many education providers are suggesting that disability service providers should cater for training and education needs in specialised settings. All Further Education and Training opportunities through SOLAS should be open to students with intellectual disabilities, with the appropriate supports and timeframe to achieve their full potential.