



JMB

JOINT MANAGERIAL BODY
For Voluntary Secondary Schools

Pre-Budget Submission 2021

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Recovery and Re-emergence into New Realities

Summary of Recommendations

In this submission, JMB tracks five overarching goals of the Mission: *'Better Opportunities through Education and Research'* as outlined in the 2020 Programme for Government, *'Our Shared Future'*.

Section 1: Preparing for Post-COVID Education

Sustainable School Leadership for Reopening and Recovery

Our voluntary secondary principals have invested every personal and professional resource since March and consequently transformed what could have been a catastrophic fracturing of their school communities, into creative, life-affirming, dispersed families of adults and young people caring for and about each other. The new Government must enable school leaders to lead. This means that additional staff resourcing will be required in every school for the foreseeable future. There should equally be automatic substitution provided for teachers who become unwell or must quarantine.

Recommendations:

- **We urge the Department to provide for an increased allocation of AP1 posts of responsibility, or an equivalent in terms of hours for flexible deployment, to support the additional leadership and management functions demanded by re-opening, recovery and renewal of school communities**
- **DES must also provide for a more equitable allocation of Assistant Principal posts across schools of different enrolments**
- **Boarding schools will require an additional range of specific supports in terms of enrolment capacity, accommodation configuration, social distancing and Covid-related health and safety provision**
- **In line with the Programme's commitment *'that schools be given the time to implement required changes'*, the JMB strongly recommends that the Department allows at least two academic years to lapse before initiating any further policy agendas impacting on the workload of principals**

Enhancing Guidance & Counselling Services

It is incredible that we are still seeking at least a restoration of guidance and counselling provision in our schools to pre-financial crash cutback levels. At this point however, JMB is now demanding a 50% increase in provision for guidance and therapeutic counselling in the face of a generation of students returning to school with unprecedented needs in terms of trauma recovery, metacognitive skills loss, career plan damage and a raft of other crises which must be mediated by their school.

Recommendations:

- **JMB demands a 50% increase in provision for guidance and counselling, as well as therapeutic interventions, in the face of a generation of students returning to school with unprecedented needs**
- **The adverse treatment of fee-charging schools in terms of their reduced G&C allocation (based, as it is on a higher PTR), should be discontinued**
- **JMB urges the Department to support the training of new guidance counsellors, particularly in light of (a) the cost to individual teachers and (b) substituted release for training and work-shadowing**

Resourcing Digital Technologies for Blended Learning

The government's own school re-opening policy document states that 'to a greater or lesser extent, schools may be required to provide both in-school and remote learning support during the coming school year'. Ireland will need to borrow substantially to pay for capital and infrastructural requirements which will support recovery. Failing to invest properly in this once in a generation opportunity to capitalise on an imposed but very real digital revolution makes no sense.

Recommendations:

- **As part of an urgently required review and redrafting of the state's Digital Strategy for Schools, adequate emergency and thereafter annualised ICT funding must be adjusted upwards to provide for school-wide remote device purchase, up-to-date teacher CPD in distance teaching and assessment, on-site technical and administrative support and enhanced Wi-Fi infrastructure**
- **DEIS school communities require significant infrastructural investment in light of their experience of distance teaching and learning since March 2020**
- **Adverse treatment of schools in the fee-charging sector, in which grants such as those for ICT are reduced by 50%, must be discontinued**
- **Grant aid must be restored for the purchasing, maintenance and support of school administration packages**

Section 2: Striving for Excellence in Education

National Level Strategic Planning

In the urgent struggle to sustain life and social cohesion, an early casualty of the Covid pandemic was the capacity of individuals, organisations and entire countries to adhere to carefully crafted strategic plans, goals and aspirations. In terms of the new future we face together, JMB therefore welcomes the proposed establishment of an Education Research and Policy Section.

Recommendation:

- **Though welcome, the proposed Education Research and Policy Section within the Department should be given an expanded brief and a much wider composition in terms of stakeholder engagement**

Embedding and Evaluating Junior Cycle

As the Framework for Junior Cycle continues to be implemented across our schools, two outstanding issues remain to be addressed. The first relates to the inadequacy of the replacement hours to be provided for the 22 hours per year, pro-rata, professional time for teachers. Secondly, the failure to achieve a re-negotiation or an agreed re-interpretation of the ambiguous agreement wording on the scheduling of SLAR meetings will continue to leave school management and teachers in an impossible position.

Recommendations:

- **Staffing resources lost in the reduction of the class-contact week to 21:20 hours, pro-rata, must be replaced in full each year**
- **Agreement on a framework for scheduling SLAR meetings that protects tuition time must be achieved as a matter of priority**

Renewing Relationships & Sexuality Education

As a matter of priority, and in advance of the emergence of a new set of curriculum specifications for RSE which could yet take some time, the Department should invest in a new round of training opportunities for teachers to maintain and increase the pool of such educators available for scheduling into RSE classes.

There is an urgent need for a targeted, evidence-based programme to support young transgender people in post-primary schools. JMB urges the Minister to positively consider a forthcoming service-delivery proposal from TENI which has the support of the management bodies and teacher unions.

Recommendations:

- **While educators await the emergence of revised curricular specifications in RSE, the Department should put in place CPD and post-graduate development opportunities for contemporary teachers in this vital aspect of our education provision**
- **JMB urges the Minister to positively consider a forthcoming service-delivery proposal from TENI which has the support of the management bodies and teacher unions**

Section 3: Investing in High Quality Education

Towards Equitable and Fair School Funding

There will, of course, be many competing priorities in each forthcoming government Budget. Equalisation of funding across all school communities and sectors must be one of them. The

Primary and Post-Primary section of the Programme for Government opens with the words *‘Education is a cornerstone of society and a driver of social equality’*. It is the JMB position that now is the time to move beyond the rhetoric of social equality to its actualisation and we welcome the Programme’s commitment to ‘increase the capitation grant with a view to reducing the reliance on voluntary contributions made to schools’

Recommendations:

- **A commencement must be made to address the inequitable funding of schools in the Voluntary Secondary sector by initiating the Equalisation process already conceded by government**
- **In 2017, the then Minister agreed that it was planned to abolish the basic salary payment made by boards of management to their teachers which is a unique feature of the Voluntary Secondary sector, costing a school with 30 teachers €16,875 per annum. While 20% of this deduction was removed in Budget 2020, the new Minister must now eliminate completely this systematic cut to our schools’ funding**

Enhancing Teacher Supply

JMB appreciates the level of seriousness and urgency with which the Department and its associated agencies have been affording this crisis. We are, however, anxious that approaches relying on self-regulation at initial teacher education provider level, coupled by increasingly onerous recognition pathways for teachers from outside the jurisdiction are adding to the problem.

Recommendations:

- **Strategic and binding proposals to address the issue of inadequate teacher supply must emerge from the national conversation on this issue – self regulation by ITE providers and granular qualification recognition criteria must be addressed as a matter of urgency**
- **While current, high-level approaches will have long-term effects, JMB urges the Department to implement immediate, short term alleviation strategies to assist recruitment for the forthcoming school year**

The Neglected Pupil-Teacher Ratio

The Programme for Government indicates that the State will ‘seek to make further progress in reducing pupil teacher ratios in primary schools’. While such investment at primary level is long overdue, the stark absence of any reference to equivalent treatment at post-primary level is hugely concerning.

Recommendations:

- **The pupil teacher ratio for schools in the Free Education sector must be restored to 18:1 in order to alleviate the impact of the cutbacks on staffing in schools in recent years and to support a recovery of teaching time lost in 2020**

- **Fee-charging schools, a long-standing and successful example of Public-Private Partnership, are a net contributor to the economy. The pupil-teacher ratio in these schools must be reduced as a first step from 23: 1 to 21:1**
- **As staffing allocations in areas such as professional time for teachers of junior cycle and guidance counselling are based on a PTR model, schools in this sector are doubly discriminated-against – a practice which requires greater equity**

School Buildings: Demographic Growth and Physical Education

If ever there was an appropriate time for significant investment in school buildings and their sports facilities, it is now. Many voluntary secondary schools have been serving their communities for more than 150 years. Many were built or extended to with no or limited State assistance and are now in need of major refurbishment and extensions. JMB welcomes the commitment to ‘deliver a programme to build and modernise P.E. and school sports facilities’ as our research indicates that just 50% of schools have a full-sized P.E. Hall.

Recommendations:

- **A major increase in the Capital Budget for voluntary secondary schools is required:**
 - **To allow for additional schools not on the Six Year Plan but in serious need of refurbishment and extensions to be added to the List**
 - **To meet a greater number of demands under the Additional Accommodation scheme**
 - **To allow for a greater number of categories to be approved under the Summer Works Scheme**
 - **To allow for a greater number of Emergency Works to be approved**
 - **To eliminate prefabricated classrooms**
- **JMB urges that as many forms of delivery be put in place so that major projects be progressed through the DES stages in an efficient and speedy manner**
- **A special five-year plan is required to provide a full-sized P.E. Hall facility in every school with an interim scheme to replace obsolete sports equipment**

Section 4: Addressing the Cost of Education

The Student and Parent Charter Bill

The JMB welcomes the government’s intention to enact the Student and Parent Charter Bill. We have long argued for greater coherence in national educational policymaking and we therefore welcome this bringing-together of a clearly articulated set of principles underpinning the relationship between parents and students on the one hand and schools on the other. In advance of enactment however, JMB would urge the new Minister to consider the balancing of rights and responsibilities contained within the provisions and to address these by way of regulation following enactment.

Recommendation:

- **In advance of its enactment, the JMB would urge the Minister to carefully consider the provisions of the Student and Parent Charter Bill – or at least the regulations that will follow its passing into law – in terms of its balance of rights and responsibilities, implications for principals’ workload and possible unintended consequences.**

The Cost of Schooling on Families

The fact is that all voluntary secondary schools operate under severe funding restrictions and are acutely aware that the families they serve are equally not immune to financial pressures. Instead of attempting to micro-manage schools with punitive measures, the Minister should eliminate the need for schools in our sector to seek voluntary contributions from families, a measure which would immediately and significantly alleviate the pressures on all concerned.

Recommendations:

- **Seed capital and a flexible quantum of teacher hours for administration must be provided to schools for the establishment and operation of school book rental schemes**
- **Guidelines and encouragement, not threats to cut funding, should be offered to schools to review school uniform policies**

Section 5: An Inclusive Vision for Education

Resourcing Recovery for Students with Special Educational Needs

While it is clear that both State and schools remained highly concerned about the fate of students with special education needs during the school closures, there has been clear evidence of a loss of engagement, skills, learning and human connection that will require to be treated with the urgency it deserves once schools continue on their reopening journeys.

As a matter of urgency, the government must increase the SET allocation to all schools by at least 30% and, once and for all, make distinct provision for SEN Coordination.

Recommendations:

- **The landscape of SNA provision has been radically worsened by the Covid pandemic and schools will need at least a 30% increase in SET allocation to mitigate its worst effects**
- **A special educational needs co-ordinator (SENCO) must be appointed to all post-primary schools with a weekly allocation of at least 10% of a school's ‘profile hours’ (with a baseline threshold of 2 hours per week) to be flexibly deployed by management but ring-fenced to the SENCO and their team**
- **The proposed implementation of a profile-based model of SNA allocation and deployment must be paused until its key backing conditions have been established and agreed**

- **JMB urges the Minister to consider the establishment of a nationwide team of therapists fully within the Department of Education and not outsourced from other Departments such as Health or DCYA**

The DEIS School Response

The lengths to which DEIS school leaders and their communities went to maintain student engagement and inclusivity during the pandemic emergency may perhaps never be known. As an immediate action, we now call for the provision of a second deputy principal in DEIS schools of between 500 and 699 students. JMB urges the new Minister to implement this equity measure for the forthcoming school year, with an extension of the initiative to all DEIS schools from 2021/22.

Recommendations:

- **DEIS school principals worked tirelessly during this pandemic and they must, as a matter of urgency, be provided with acceptable levels of senior leadership support to allow them and their school communities to survive the extreme challenges following in the wake of this crisis**
- **We seek, as an immediate action, the provision of a second deputy principal in DEIS schools of between 500 and 699 students, with an extension of this allocation to all DEIS schools from 2021/22**
- **The Department's reconfiguration of the DEIS scheme must go further to provide for a more equitable framework for addressing disadvantage. The all-or-nothing approach to DEIS inclusion must be reviewed to provide schools with high numbers of students experiencing disadvantage with targeted supports**

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Recovery and Re-emergence into New Realities

Introduction

When we, as a nation, eventually begin to reflect more deeply on the causes, course and consequences of the Covid-19 pandemic on Irish society, we will, along with all the other bringers of hope and stability, identify school leaders and their teachers as critical to our country's survival story. In our mid-financial crisis Pre-Budget Submission of 2015, the JMB reminded government:

We recognise that our country has not yet regained the ground lost to the financial crisis since 2008. It must, however, be acknowledged that our school management and principals have worked steadily and at great personal cost to maintain stability in our schools and to protect their students from the worst effects of wave after wave of education cuts, mostly targeted at the vulnerable.

If we have not, as a nation, changed our 'pre-crash' values, then the pain of recent years has been for nought.

In this submission, we once again strongly re-assert the centrality of education as a public good, and of educational communities, led by people of deeply held ethical, spiritual and civic values, as resilient and responsive beacons of hope for our sometimes-fragile society. And it is precisely this fragility which must act as a wake-up call, returning contemporary Irish men and women to their undeniable inner resources as individuals, but perhaps more importantly, our shared civic and moral values, care for the most vulnerable and an appreciation of authentic leadership at all levels. For the second time in recent memory, we have come close to breakdown. For the second time in recent memory, we have had to rediscover the soul of our shared life on this island. For the second time in recent memory, we have relied on quiet heroism to bring us home safely.

Schools are far more than academic institutions, teachers more than bearers of knowledge, principals more than administrators. If ever the country – indeed countries across the world – needed evidence of these truths, it has been during this lockdown. Perhaps the only positive outcome of this emergency has been an appreciation of the unseen and under-appreciated work, worry, creativity, resilience and relationship evidenced by ordinary, yet extraordinary people, working in supermarkets, hospital wards and in school communities.

'I really miss my teachers' – who'd have thought!

Our nation's recovery from this pandemic will be shallow, short-lived and a wasted opportunity if we ignore the realities of trauma. Trauma is the response to a deeply distressing or disturbing event that overwhelms an individual's ability to cope, causes feelings of helplessness, diminishes their sense of self and their ability to feel the full range of emotions and experiences. We therefore need to frame each and every public-domain decision at political, policy and practice levels, as if we were dealing with individuals and communities recovering from trauma – because we are.

JMB appreciates the recovery and rebuilding focus of the new Programme for Government, *'Our Shared Future'*. In this submission, we track five overarching goals of the programme's Mission: *'Better Opportunities through Education and Research'*, and we intentionally focus our recommendations for action on those elements which will bring our schools back to life, indeed back to the Gospel promise of *'life to the full'*.

Section 1: Preparing for Post-COVID Education

From the Programme for Government:

Education will play a key role in our recovery after Covid-19 and in our ongoing efforts to tackle the climate crisis. The Government will ensure that as it develops reopening plans, students and parents are included, that schools have the time to implement required changes, and that students transitioning between education levels are supported.

We will prepare detailed contingency plans for further potential school closures while also investing in teacher CPD to support distance and blended learning.

The reopening plans will consider detailed protocols for the reopening of all schools and necessary supports for the Leaving Cert class of 2020 and subsequent years will also be provided.

Sustainable School Leadership for Reopening and Recovery

It can be no accident that countries successfully mitigating the worst effects of the pandemic, such as New Zealand and Ireland, had national leaders who were ethical, caring, competent, well-resourced and trusted by their people.

Our voluntary secondary principals, ethical, caring and competent all, put their own wellbeing on the line since March and consequently transformed what could have been a catastrophic fracturing of their school communities, into creative, life-affirming, dispersed families of adults and young people caring for and about each other.

What is less certain however, is that our principals are well supported and resourced to carry out their legislatively determined roles. JMB acknowledges and welcomes the provision of additional deputy principals in larger schools in recent times, which represents a cost-effective model of enhancing the leadership base in our schools. We have relied on a single person at the neck of a responsibility hour-glass for far too long. Schools need a unitary apex leader, but to exercise the type of transformational leadership demanded of them, fit-for-purpose second and third tiers are essential. JMB is in no doubt but that principals are at breaking point. Witness the term *'the school will ...'* repeated time and again in each and every policy document issued by the Department during this crisis. For *'the school will ...'* or *'schools will ...'*, read *'the principal will ...'*

To be specific, the following checklist of *'the school wills ...'* has emerged in terms of actions for re-opening which are, in fact, the responsibility of the principal:

1. Covid-19 Response Plan to be prepared
2. Risk assessment and Safety Statement to be updated
3. Pre- Return to Work (RTW) self-assessment questionnaire to be prepared
4. On-going consultation with all staff
5. Training module to be prepared for a Return to Work (RTW)
6. Planning to start on social distancing arrangements for school – one-way systems, use of lifts, classroom layouts, social distancing screens, social areas, etc.
7. Break time arrangements to be reviewed

8. Arrangements for visitors and deliveries to be prepared
9. Sign in-sign out procedures to be reviewed (contact tracing)
10. Protocol to be prepared to deal with person who develops signs and symptoms of Covid-19 on school campus
11. Need to identify isolation area(s) within building
12. Code of Behaviour to be reviewed to address non-compliance issues
13. Guidance to be prepared for staff if working from home
14. Transport arrangements to be reviewed particularly drop and collection areas
15. Checklist to be developed for safe use of equipment in specialist rooms
16. First Aid procedures to be reviewed
17. Supervision arrangements to be reviewed
18. Need to establish where PPE will be required by staff
19. Need to have a protocol for work activities by staff where physical distancing is not possible
20. Need to develop a schedule for increased, routine cleaning and disinfection of all frequently touched surfaces within school campus
21. Need to have a procedure for staff when handling books and equipment
22. Hand hygiene and respiratory etiquette protocols in place
23. Hand washing facilities and sanitisers in multiple locations
24. Necessary signage and information displayed for the management of Covid-19
25. Additional waste collection points
26. Supervision plan to ensure compliance with social distancing requirements
27. Monitoring of access to and egress from school campus
28. No high-risk staff allowed to return to work
29. Receive necessary training prior to returning to work
30. Consulted about Covid-19 Response Plan and Safety Statement update
31. Appoint a Lead Worker
32. Provide the Lead Worker with information and guidance around a safe return to work, medical information, personal responsibility and duties
33. Continue to use virtual meetings until public health policy guidelines change
34. On-going consultation prior to reopening
35. No high-risk students allowed to return to school
36. Staff and students to be provided with necessary information and guidance to prepare for school reopening
37. Updated procedures to be outlined and explained
38. COB to be resigned following review
39. System for regular communication to be established
40. Arrangements for classrooms to be reviewed in light of public health policy and the necessary control measures required to protect the health and safety of staff and pupils
41. Arrangements for administration areas to be reviewed in light of public health policy and the necessary control measures required to protect health and safety of staff and students
42. Social distancing plan to be prepared
43. Ground markings (2m currently)/indicative stickers to be considered
44. Cleaning regime with records in place
45. Sufficient liquid hand-wash soap and sanitisers available

46. Social distancing plan
47. Additional equipment for classrooms
48. Additional supervision
49. Sanitisers
50. Planning for additional cleaning staff and/or increased contactor costs
51. Essential cleaning materials for staff to keep their own work areas clean i.e. wipes/disinfection products, paper towels, etc.
52. Training – First Aid; use of PPE
53. Plan for safe co-curricular and extra-curricular activities
54. Plan for safe P/T meetings
55. Plan for safe open evenings
56. Plan for safe Parent Council, Board of Management and Student Council meetings
57. Plan for no sharing of equipment by students
58. Enforce a “No hand shaking, no hugging, no high five protocol” within school facility
59. Enforce a “No photos or selfies protocol” within school facility
60. Maintain records and seek relevant approvals from BOM and trustees on all significant Covid-related expenditure

This is an edited, reduced list.

It speaks for itself.

Meanwhile, the teaching and learning mission of the school, and its associated administrative workloads, continue apace.

The new Government, on behalf of the people, faces many choices. One of these, if their rhetoric that schools ‘*will play a key role in our recovery after Covid-19*’ is to be believed, must be to enable their school leaders to lead and manage sustainably. In simple and stark terms, additional staffing resources will be required in every school for the foreseeable future. There should equally be automatic substitution provided for teachers who become unwell or who have to quarantine.

Boarding schools will also require an additional range of specific supports in terms of enrolment capacity, accommodation configuration, social distancing and Covid-related health and safety provision.

JMB very much welcomes the decision by the Inspectorate to substantially restrict its programme of in-school evaluations until 2021 and to pause its planned circular on the school self-evaluation process. In line with such a reasoned approach, and also the Programme’s commitment ‘that schools be given the time to implement required changes’, the JMB strongly recommends that the Department allows at least two academic years to lapse before initiating any further policy agendas impacting on the workload of principals.

RECOMMENDATIONS:

- **We urge the Department to provide for an increased allocation of AP1 posts of responsibility, or an equivalent in terms of hours for flexible deployment, to support the additional leadership and management functions demanded by re-opening, recovery and renewal of school communities**

- **Boarding schools will require an additional range of specific supports in terms of enrolment capacity, accommodation configuration, social distancing and Covid-related health and safety provision**
- **DES must also provide for a more equitable allocation of Assistant Principal posts across schools of different enrolments**
- **In line with the Programme’s commitment ‘that schools be given the time to implement required changes’, the JMB strongly recommends that the Department allows at least two academic years to lapse before initiating any further policy agendas impacting on the workload of principals**

Enhancing Guidance & Counselling Services

It is incredible that we are still seeking at least a restoration of guidance and counselling provision in our schools to pre-financial crash cutback levels. At this point, JMB is now demanding a 50% increase in provision for guidance and therapeutic counselling in the face of a generation of students returning to school with unprecedented needs in terms of trauma recovery, metacognitive skills loss, career plan damage and a raft of other crises which must be mediated by their school.

What has emerged in the tentative restoration approaches undertaken thus far, is a re-modelling of provision which does not restrict the allocation of the full quantum of G&C hours to a single person. Management bodies have supported this flexibility and, by and large, its evolution has been effective in creating a school-wide appreciation of, and provision for, these core activities.

In demanding a 50% increase in provision, JMB is cognisant of the difficulties of recruiting fully qualified and experienced guidance and counselling personnel. The model of deployment currently in place, however, facilitates a realignment of role and responsibility on a school-wide basis to ensure each student receives the restorative care, whether personal, psychological, pedagogical or career-related they deserve. We cannot carry out this critical task on behalf of society on a shoestring. The money spent on such an early, school-level intervention will pay itself back to the exchequer in many multiples over the next five to ten years when it will become the responsibility of our clinics, hospitals, social workers, psychiatric services, employers and, indeed, prisons who will have to bear the burden.

Meanwhile, the adverse treatment of fee-charging schools in terms of their reduced G&C allocation (based, as it is on a higher PTR), should be discontinued. The effects of the pandemic on young people knows no borders, territorial or social.

In terms of supply challenges, we urge the Department to support the training of new guidance counsellors, particularly in light of (a) the cost to individual teachers (b) release for training, now more frequently only offered in school time, and, (c) time for shadowing. We need a structure mirroring that provided for special education teachers and which increases post-graduate opportunities to specialise in this much needed field.

RECOMMENDATIONS:

- **JMB demands a 50% increase in provision for guidance and counselling, as well as therapeutic counselling interventions, in the face of a generation of students returning to school with unprecedented needs**
- **The adverse treatment of fee-charging schools in terms of their reduced guidance and counselling allocation (based, as it is on a higher PTR), should be discontinued**
- **JMB urges the Department to support the training of new guidance counsellors, particularly in light of (a) the cost to individual teachers and (b) substituted release for training and work-shadowing**

Resourcing Digital Technologies for Blended Learning

In a recent paper, Michael Fullan et al said:

The fallout of Covid-19, continuing advances in digital technology, and intensifying pent-up demand for student-centred learning have combined to present an unprecedented opportunity to transform education across whole systems.

We have been impressed by the tireless action to address the emergency needs of students and families. We are deeply encouraged by the growing desire to seize the opportunity to focus on the deep purpose of education through the twin pillars of well-being and learning.

This powerful shift to a learner-centred system will be amplified by technology and driven by education that is steeped in purpose and meaning.

So, we now have ‘*an unprecedented opportunity to transform education*’.

If we take this opportunity, Fullan maps it out into three phases:

Phase 1 Disruption identifies initial responses and the lessons learned during the first months of the pandemic.

Phase 2 Transition outlines how to navigate planning for reopening, when the pandemic is still creating uncertainty.

Phase 3 Reimagining lays out a vision for an educational approach that enables all students to thrive and prepares them with skills to navigate ambiguity and change. This phase draws from the best of traditional approaches, innovative practices, and insights from remote learning to shape new, flexible, agile hybrid learning models.

‘Shape new, flexible, agile hybrid learning models’: Imagine being principal of a school still trying to afford a fit-for-purpose Wi-Fi network in the school; find time and resources to provide relevant CPD for their teachers; plan for a digital learning strategy which can be delivered in a device-poor and broadband-deficient community; source cost-effective technical support; navigate the plethora of advice, policies, child protection guidelines, GDPR and other well-intended but administratively demanding requirements; fit a classroom-shaped curriculum into a digitally-shaped space, and the list goes on.

The government's own school re-opening policy document states that 'to a greater or lesser extent, schools may be required to provide both in-school and remote learning support during the coming school year'. This is accepted, and in fairness, the document also admits to some of the many challenges facing schools and students in terms of their blended learning experience:

- The cost and availability of suitable devices for students
- Poor broadband coverage and broadband blackspots
- In DEIS schools in particular, a near total reliance on mobile phones
- Pay-as-you-go credit
- Inequity of access in the virtual learning environment
- The effectiveness of a distance learning programme for SEN students
- Sustained and purposeful CPD
- Students known to be living in difficult circumstances
- Students with mental health difficulties

Yet again, the state will not mitigate these challenges on the cheap. It is clear that Ireland will need to borrow substantially to pay for capital and infrastructural requirements which will support recovery. Failing to invest properly in this once in a generation opportunity to capitalise on an imposed but very real digital revolution makes no sense.

RECOMMENDATIONS:

- **As part of an urgently required review and redrafting of the state's Digital Strategy for Schools, adequate emergency and thereafter annualised ICT funding must be adjusted upwards to provide for school-wide remote device purchase, up-to-date teacher CPD in distance teaching and assessment, on-site technical and administrative support and enhanced Wi-Fi infrastructure**
- **DEIS school communities require significant infrastructural investment in light of their experience of distance teaching and learning since March 2020**
- **Adverse treatment of schools in the fee-charging sector, in which grants such as those for ICT are reduced by 50%, must be discontinued**
- **Grant aid must be restored for the purchasing, maintenance and support of school administration packages**

Section 2: Striving for Excellence in Education

From the Programme for Government:

We are committed to supporting the development of a shared understanding of the value of education, which addresses how education can prepare people of all ages to meet new societal, environmental, technological and economic challenges which face us all.

We will:

Establish a new Education Research and Policy Section within the Department tasked with ensuring that education policy development in Ireland is informed by a strong evidence base, is outcomes focused, and cognisant of best international practices.

Continue to review and reform the post primary curriculums, prioritising elements such as critical thinking, problem solving and continuous assessment so that they feature more centrally.

Develop inclusive and age appropriate RSE and SPHE curricula across primary and post-primary levels, including an inclusive programme on LGBTI+ relationships and making appropriate legislative changes if necessary.

National Level Strategic Planning

In the urgent struggle to sustain life and social cohesion, an early casualty of the Covid pandemic was the capacity of individuals, organisations and entire countries to adhere to carefully crafted strategic plans, goals and aspirations. Indeed, if one bought a 2020 year planner back in January, it was money wasted.

Yet, while the system-level response to the crisis has been likened to building a ship while crossing mid-ocean, policies, plans and protocols nonetheless emerged. At this point, the JMB wishes to put on record its gratitude to the Department and its agencies whose officials worked long days and nights, weekdays and weekends, to build the ship. At school level, inevitable frustrations arose around timeliness of communication, evolving and sometimes shifting policy, lack of clarity around emerging demands on principals, concurrent and overwhelming compliance, shifting deadlines etc. What was never in doubt, however, was the good faith, highly responsible, hugely demanding and intensively collaborative effort put in by officials of the DES, SEC, NCSE, NCGE, NCCA, NCGE, NEPS, PDST, Inspectorate and many others across the spectrum of education policy and practice in Ireland. *Ádh mór, agus beannacht Dé ar an obair.*

In terms of the new future we face together, JMB welcomes the proposed establishment of an Education Research and Policy Section within the Department.

It is clear from the initial proposal that this entity will be underpinned by evidence-informed decision-making. This philosophy is, of course, virtually universal in terms of validating outputs by contemporary policymakers but we have serious concerns that the Section will suffer from the fundamental flaw of adopting a too narrow view of what constitutes evidence. Not all the problems of teachers and teaching are technical in nature and thus not all are open to solution by research. Given the social character of the school world, the best educators make judgements rather than following rules. They base their practices on four grounds:

- Tradition (how it has always been done)
- Prejudice (how I like it done)
- Dogma (this is the ‘right’ way to do it), and,
- Ideology (as required by the current orthodoxy)

This is not an argument for not putting professional decision-making to the evidential test. Rather, JMB, while welcoming the new structure, urges an expansion of its brief, a reconsideration of its philosophical underpinnings and a much wider composition in terms of stakeholder engagement.

Indeed, JMB has long argued for precisely such a forum in one submission after another:

We need someone at the ‘top’ of the education policy-making pyramid to have the complete picture. At present the Department is heavily siloed. One section doesn’t speak with the other on an effective basis. In fact, the only people in the country who operate at the centre of the nexus of policy-overload are our principals, who must implement everything. To support a more realistic and grounded policy framework, JMB urges the Department to develop a model of structured input from people with school management experience and to ensure that every major decision is ‘road-tested’ by those charged with its implementation. The lack of inspectors with school management experience is a case in point. DES should use the secondment process, with retained allowances, to boost its school-management perspective and this will represent a small amount of money well spent.

Ministers are, of their role, transitory. A key strategic priority for the Department must be to put in place an oversight structure with both a mandate and authority to take an overall view of policy and practice developments and attack both the incoherence and overload impacting on our schools. Its primary function must be to map system capacity against policy priority. We cannot have ‘joined-up thinking’ if no-one is responsible for doing this thinking. If it is everyone’s responsibility, it is no-one’s responsibility.

RECOMMENDATION:

- **Though welcome, the proposed Education Research and Policy Section within the Department should be given an expanded brief and a much wider composition in terms of stakeholder engagement**

Embedding and Evaluating Junior Cycle

The decision to limit Classroom-Based Assessments to one instead of two for the cohort of students entering 3rd year in September 2020 is a welcome adaptation of the Framework in terms of responsiveness to the current crisis. JMB also welcomes the NCCA’s awarding of a research contract to conduct a large-scale and longitudinal study of the impact of the Framework in schools. It is expected that the learnings from such an independent study will generate significant opportunities for ongoing policy in the area of curriculum and assessment and JMB encourages the Minister and partners to engage positively with all recommendations as they emerge.

Meanwhile, as the Framework for Junior Cycle continues to be implemented across our schools, several outstanding issues remain to be addressed. The first relates to the inadequacy of the replacement hours to be provided for the 22 hours per year, pro-rata, professional time for teachers. It is incomprehensible that the Department is providing less than the number of hours lost to allow for this. The missing hours must come from somewhere – reducing curricular options, enlarging class size, cutting special needs time – the Department’s assertion that ‘the quantum of hours provided to replace TPT were never intended to fully

compensate for those lost' is not only meaningless, it betrays a set of values we have never associated with the Department or its officials. It is time to remediate this injustice once and for all and to fully compensate school communities for the loss of hours they must allocate under the junior cycle agreements.

In an equally serious development, Circular 0055/2019, and previous relevant circulars, cite the DES-union agreement on scheduling SLAR meetings thus:

'Since professional collaboration meetings can only be held when the relevant subject teachers can be present, a limited number of meetings may need to draw on teachers' bundled time to run beyond normal school tuition hours for some of the duration of the meeting'.

There are 27 subjects on the junior cycle curriculum and even a medium-sized school will offer at least 20 of these. Such provision will require 40 SLAR meetings per year, into the foreseeable future.

If teachers cite the clause '*... a limited number of meetings may need to draw on teachers' bundled time to run beyond normal school tuition hours ...*' and seek to have their SLAR meetings begin within tuition time (a rational interpretation of the wording) this would require an average of say, five 40-minute class periods to be substituted-for in respect of virtually *every* SLAR meeting for the next 20 – 30 years at least. This represents a staggering loss of over 133 hours of tuition time every year, not to mention the cost of cover, the unavailability of substitutes, parents' concerns around multiple 'free classes' and the student discipline issues this would raise in 200 untaught last-class-of-the-day sub-periods every school year.

In reality however, teachers are taking the clause above at face-value and seeking to have the *entire* SLAR meeting take place within tuition time. This would represent a loss of four teaching hours per teacher per subject each year and twice that if, as is the case with the majority, teachers have a second subject.

Even during the current crisis, this issue has been reiterated as 'not having gone away'. Failure to achieve a re-negotiation or an agreed re-interpretation of this clause will leave school management and teachers in an impossible position; will result in some schools not being in a position to operate SLAR meetings; will cause friction between staff and principals; will erode the whole intention of junior cycle reform; will create a SLAR substitution precedent which will only escalate and from which there will be no return, and will alienate both teachers and management from the junior cycle enterprise.

RECOMMENDATIONS:

- **Staffing resources lost in the reduction of the class-contact week to 21:20 hours, pro-rata, must be replaced in full each year**
- **Agreement on a framework for scheduling SLAR meetings that protects tuition time must be achieved as a matter of priority**

Renewing Relationships & Sexuality Education

Education cannot be deemed to be holistic in any sense if it ignores either our actions or the spiritual or moral basis of the values that inform such actions. Neither can we be deemed to be fulfilling our school mission statements, the majority of which cite ‘development of the whole person’, if we ignore the values and the humanity underpinning our sexuality and sexual activity. It is therefore incumbent upon schools to engage fully with patrons, parents and policy-makers in the development of high-quality programmes of relationships and sexuality education (RSE) congruent with the ethos of the school and setting out to educate, in the truest sense, the values, understandings and actions of the generation of young people in their care.

Our commitment to the integration of Gospel values into the curriculum and daily life of the school means that the ethical and moral frameworks underpinning what is taught within RSE classes are congruent with Church teaching on sexual morality, within the particular faith tradition - Catholic or Protestant in the case of JMB schools.

This does not mean that an embargo exists around any truly human experience or that faith schools will not discuss or engage with any particular aspect of the curriculum. The exact opposite is the case. The fully human nature of Jesus Christ means that nothing truly human is alien to God and cannot be alien to true educators either.

JMB is thus encouraged by the scope of the RSE review which has been undertaken by the NCCA, and which included:

- How the RSE curriculum is planned, how it is taught and how parents are involved;
- That the entire curriculum is being taught in schools to a high standard;
- The role of the classroom teacher in teaching the curriculum and the appropriate level of supports which are currently being provided by external providers;
- What time is given to it, what resources are being provided, and what support materials are being used;
- How effective is the continuing professional development opportunities which are currently provided by the Department and other bodies to RSE teachers?

As a matter of priority, and in advance of the emergence of a new set of curriculum specifications for RSE which could yet take some time, the Department should invest in a new round of training opportunities for teachers to maintain and increase the pool of such educators available for scheduling into RSE classes. There exists a need to adequately train and professionally develop RSE teachers in their own right – developing expertise in every aspect of both the course materials and the likely questions necessarily arising in the classroom setting. The development of a post-graduate diploma course in SPHE/RSE and recognition of the subject for registration by the Teaching Council are particularly to be recommended.

Transgender Students

There is an urgent need for a targeted, evidence-based programme to support young transgender people in post-primary schools. A school’s response should be holistic and integrated, where the support of the student is the key consideration.

A key partner with JMB in providing professional and effective pastoral support to transgender students, their families and their schools is the advocacy and support organisation, Transgender Equality Network Ireland (TENI). TENI is seeking funding to deliver training and create and provide practical tools and resources to schools and staff. JMB urges the Minister to positively consider a forthcoming service-delivery proposal from TENI which has the support of the management bodies and teacher unions.

RECOMMENDATIONS:

- **While educators await the emergence of revised curricular specifications in RSE, the Department should put in place CPD and post-graduate development opportunities for contemporary teachers in this vital aspect of our education provision**
- **JMB urges the Minister to positively consider a forthcoming service-delivery proposal from TENI which has the support of the management bodies and teacher unions**

Section 3: Investing in High Quality Education

From the Programme for Government:

Teachers and pupils are at the heart of our education system. We will adopt an evidence based and outcomes focused approach to our policy interventions that we will make to support our school leaders and teachers in their work.

We will:

Seek to increase the capitation grant with a view to reducing the reliance on voluntary contributions made to schools.

Examine a targeted government scholarship scheme to focus on encouraging graduates into subject areas where there is a shortage of post-primary teachers in the profession.

Conduct a comprehensive audit and inventory of all school buildings, infrastructure and facilities in the State, and the creation of a database of all school admissions policies. Place the Minor Works Grant on a permanent footing for schools.

Deliver a programme to build and modernise PE and school sport facilities.

Towards Equitable and Fair School Funding

'It is clear that voluntary secondary schools receive a significantly lower proportion of funding from the state and, as a result, are more reliant on voluntary contributions from parents and on general fund-raising. This reliance on discretionary funding is seen to pose challenges given lower levels of resources among some families, especially those with children attending DEIS schools, and means that funding sources are vulnerable to future changes in family income. Sectoral differences are also evident in the expenditure of schools, with voluntary secondary schools more likely to be required to cover from the

capitation grant items paid centrally in case of the other sectors and, in addition, need to engage in substantial fund-raising and request voluntary contributions from parents to fund the basic day-to-day running of the school.'

'Governance and Funding of Voluntary Secondary Schools in Ireland'. (2013) Merike Darmody and Emer Smyth. ESRI

If ever there was a time for this long-standing and indefensible inequity in sectoral funding to be finally and comprehensively resolved, it is now. JMB fully accepts that the Irish state will need to borrow substantially to sustain a recovery from the Covid pandemic. Our contention is that we must not, however, borrow from a generation of children and young people for whom this is their one and only chance at education. This generation's one and only chance has already been severely compromised. The new Minister and government must understand that voluntary secondary school communities are suffering due to long-standing, systemic underfunding and the capacity of families to replace the monies denied by the state to this post-primary sector alone has now all but gone. The Republic's new government now has a unique opportunity to finally honour the 1916 Proclamation's promise of 'cherishing all the children of the nation equally'.

In the immediate term, a commencement must be made through the full abolition of the basic salary payment made by boards of management to their teachers which is a unique feature of the Voluntary Secondary sector. A board of management with 30 teachers pays out €16,875, which schools in the other sectors have available to use on the resourcing of teaching and learning. We have had an acknowledgement from Department officials over the years that this is a matter that would be addressed and is an issue that we raise as a matter of urgency at every eventuality. In that regard, it was gratifying that the then Minister acknowledged the Department's commitment to us in the Oireachtas. In a reply to a parliamentary question on November 23rd, 2017 as to why a review of funding to schools has not taken place, the Minister stated:

'Given that it has not yet been possible to restore grant funding levels in the schools sector due to the many other competing priorities for available funding the review referred to by the Deputy has not yet taken place.

However, it has been agreed with the JMB that any future improvements in funding should be directed in the first instance at the elimination of the salary grant deduction from the capitation payable to voluntary secondary schools. This salary grant deduction amounts to €563 (inclusive of ER PRSI) per teaching post. The estimated annual cost of eliminating the salary grant deduction is approximately €7m'.

While 20% of this deduction was removed in Budget 2020, the new Minister must now eliminate completely this systematic cut to our schools' funding.

There will, of course, be many competing priorities in each forthcoming government Budget. Equalisation of funding across all school communities and sectors must be one of them. The Primary and Post-Primary section of the Programme for Government opens with the words 'Education is a cornerstone of society and a driver of social equality'. It is the JMB position that now is the time to move beyond the rhetoric of social equality to its actualisation and we welcome the Programme's commitment to 'increase the capitation grant with a view to reducing the reliance on voluntary contributions made to schools'.

RECOMMENDATIONS:

- **A commencement must be made to address the inequitable funding of schools in the Voluntary Secondary sector by initiating the Equalisation process already conceded by government**
- **In 2017, the then Minister agreed that it was planned to abolish the basic salary payment made by boards of management to their teachers which is a unique feature of the Voluntary Secondary sector, costing a school with 30 teachers €16,875. While 20% of this deduction was removed in Budget 2020, the new Minister must now eliminate completely this systematic cut to our schools' funding**

Enhancing Teacher Supply

Arising from significant reported challenges in the area, the JMB carried out its, by now, annual survey of its member schools last year on the availability of new and/or replacement teachers across the range of subjects and services required by our schools. The findings, in terms of subject availability, report recurring and severe shortages in Irish, French, Maths, Home Ec., Physics, Science, Guidance, German, Phys. Ed. and Chemistry. In addition, principals provided evidence of their frustration in making appointments and experiencing the following challenges:

1. In what categories did you have had to employ unregistered, retired or unqualified teaching staff in this current academic year?

Category	N
Unregistered	36
Retired	33
Unqualified	56
Registered, but not for the voluntary secondary sector	27
Total Appointments	152

2. Have you had to make any changes to your timetable or subject options due to recruitment difficulties?

Answer	Responses	
Yes	56%	64
No	44%	50
	Answered	114

3. Did any teacher whom you had recruited and had accepted the post, subsequently withdraw?

Answer	Responses	
Yes	68%	76
No	32%	35
	Answered	111

JMB has actively participated in all aspects of the Department's and the Teaching Council's data gathering, consultative and strategic approaches to this issue.

School leaders in our sector meanwhile, also recommend that in addition to the long-term processes underway, the following steps could be undertaken immediately:

- Address the current impasse regarding the inequality of salary for young teachers as current pay policy is leading many graduates to emigrate
- The fractionalisation of secondary teaching posts is having a huge effect
- It is impossible to get a Home Economics replacement teacher. Our single training college needs to take in at least triple the cohort if not quadruple to meet anywhere near the national demand as graduates are going into better paid jobs in hospitality and the food industry
- The Teaching Council needs to work with the universities in relation to how places are allocated on PME courses
- A two year part-time post-graduate course in Irish and modern continental languages similar to that provided for out-of-field Maths would help alleviate teacher deficits
- We need a standing connection between PME Providers, Second Level School Representatives and the Allocations Section in DES
- Teachers from abroad find it extremely difficult to get registered. This needs to be addressed by a dedicated teacher recognition pathway within the Teaching Council.
- Particular teaching subjects should be put on the prioritised professions list for the granting of visas from, in particular, English speaking countries. The Irish language requirements, where they exist, should also be waived.

JMB appreciates the level of seriousness and urgency with which the Department and its associated agencies have been affording this crisis. We are, however, anxious that approaches relying on self-regulation at initial teacher education provider level, coupled by increasingly onerous recognition pathways for teachers from outside the jurisdiction are adding to the problem.

RECOMMENDATIONS:

- **Strategic and binding proposals to address the issue of inadequate teacher supply must emerge from the national conversation on this issue – self regulation by ITE providers and granular qualification recognition criteria must be addressed as a matter of urgency**
- **While current, high-level approaches will have long-term effects, JMB urges the Department to implement immediate, short term alleviation strategies to assist recruitment for the forthcoming school year**

The Neglected Pupil-Teacher Ratio

If the pandemic-related school closures have proved anything, it is the centrality of the teacher-student relationship that makes all the difference in the enterprise of the school. Even the most engaged, resourced and supported student cannot form an educative relationship with a screen.

Successive Ministers appear to have forgotten the impact on schools and students of our seriously eroded staffing schedules. Ireland already has a higher ratio of students to teaching staff at secondary level than the European average, higher compulsory instruction time per student per year as well as significantly higher number of hours teaching time per year per teacher. Ireland nonetheless has one of the highest secondary school completion rates in the world at 89%, while the average school completion rate for OECD countries is 83%.

It should not be forgotten that the increase of the PTR to 19:1 coupled with the reduction in guidance counselling, EAL and Traveller support hours from schools (an effective PTR increase), have had a very severe impact on the educational experience being offered in schools. The perception that increasing the PTR in any school by a point means an additional student in a classroom is completely wrong – it means subject and specialist teachers are lost to the school.

The Programme for Government indicates that the State will ‘seek to make further progress in reducing pupil teacher ratios in primary schools’. While such investment at primary level is long overdue, the stark absence of any reference to equivalent treatment at post-primary level is hugely concerning.

Meanwhile, the Irish State recognises and supports the right of parents to send their children to the school of their choice [Education Act 1998 Section 6 (e)]. The fee-charging school Pupil-Teacher Ratio has been increased three times in recent years. Fee-charging schools are a long-standing and successful example of Public-Private Partnership and are a net contributor to the economy. There is no such thing as ‘free’ education – either the State pays, or parents pay. Schools in the fee-charging sector, where parents pay much more, save the State money. An independent study conducted by PWC has shown that the cost to the State on an annual basis for a pupil educated in a fee-charging school is €3,710 compared to €8,900 in a Free Education school. As one fee-charging school after another migrates to the free-scheme, the net cost to the exchequer increases rather than achieving any saving.

RECOMMENDATIONS:

- **The pupil teacher ratio for schools in the Free Education sector must be restored to 18:1 in order to alleviate the impact of the cutbacks on staffing in schools in recent years and to support a recovery of the teaching time lost in 2020**
- **Fee-charging schools, a long-standing and successful example of Public-Private Partnership, are a net contributor to the economy. The pupil-teacher ratio in these schools must be reduced as a first step from 23:1 to 21:1**
- **As staffing allocations in areas such as professional time for teachers of junior cycle are based on a PTR model, schools in this sector are doubly discriminated-against – a practice which requires greater equity**

School Buildings: Demographic Growth and Physical Education

While borrowing for current expenditure is not sustainable or prudent, it is clear that the government intends capitalising on Ireland's excellent credit rating to invest in infrastructural projects which will positively impact on the public good and help the country recover from the economic and social impacts of the pandemic. If ever there was an appropriate time for significant investment in school buildings and their sports facilities, it is now. Many voluntary secondary schools have been serving their communities for more than 150 years. Many were built or extended with no or limited State assistance and are now in need of major refurbishment and extensions.

Projections show that we can expect a continuing increase in enrolments at second level up as far as 2026, of at least 84,000 students. The consequences of this increase in the population of post-primary pupils have placed impossible demands on school management at a time of staffing and resource cuts and physical space limitations.

JMB is concerned that with increasing building costs and lack of sufficient personnel in the School Building Unit, even the targets of the current Six Year Plan will not be met. The emphasis should now be placed on speed of delivery. So, while welcoming progress, we urge that as many forms of delivery be put in place so that the major projects be progressed through the DES stages in an efficient and speedy manner.

There are many voluntary secondary schools who have recently applied for, or who are preparing applications for, major works but who are not on the Department's schedule of works. These schools and the communities they serve cannot wait to be assessed for capital investment. A mechanism must be found to have these schools added to the current schedule and additional funding made available to meet their needs.

There continues to be an increasing demand under the Additional Accommodation Scheme to provide additional classrooms and practical rooms for our schools, and to replace prefab classrooms. While we welcome the number of schools receiving grants, current demand clearly exceeds the level of finance available. In addition, the Additional Accommodation Scheme needs to be expanded to allow for General Purpose/Dining Areas, staffrooms and offices for additional Deputy Principals.

Likewise, the budget for Emergency Works is far too low to meet the needs of our schools. As a result, schools are forced into appealing decisions of the Building Unit in order to deal with serious emergency and safety works in their schools.

In previous Programmes for Government, the elimination of prefabricated classrooms has been specifically identified as a national priority but is absent in the current proposals. JMB hope this is an oversight as too many students and teachers continue to inhabit accommodation which is not fit for purpose in any contemporary model of education provision.

JMB welcomes the commitment to ‘deliver a programme to build and modernise P.E. and school sport facilities’, as our research indicates that just 50% of schools have a full-sized P.E. Hall. In addition, where they exist, 72% of PE Halls were either fully funded or partially funded by the schools themselves. Schools also require funding for replacement sports equipment which is becoming old and obsolete. Such equipment can very specialised and costly but there is no scheme in place unless a new sports hall is being built – a very rare occurrence. JMB believes that such funding should be available on an ongoing basis in a similar way to funding for replacement furniture, fittings and fixtures.

RECOMMENDATIONS:

- **A major increase in the Capital Budget for voluntary secondary schools is required:**
 - **To allow for additional schools not on the Six Year Plan but in serious need of refurbishment and extensions to be added to the List**
 - **To meet a greater number of demands under the Additional Accommodation scheme**
 - **To allow for a greater number of categories to be approved under the Summer Works Scheme**
 - **To allow for a greater number of Emergency Works to be approved**
 - **To eliminate prefabricated classrooms**
- **JMB urges that as many forms of delivery be put in place so that major projects be progressed through the DES stages in an efficient and speedy manner**
- **A special five-year plan is required to provide a full-sized P.E. Hall facility in every school with an interim scheme to replace obsolete sports equipment**

Section 4: Addressing the Cost of Education

From the Programme for Government:

The cost of education remains a barrier to participation and a cause of financial difficulty for many families. We will address this over the next five years.

We will:

Enact the Student and Parent Charter Bill.

Commence a free schoolbooks scheme pilot in September 2020 and, if successful review of that pilot, expand the scheme to schools nationwide as resources allow.

Emphasise the rental and reuse of books to schools and discourage the use of workbooks.

Provide clear guidelines to schools on cost effective and sustainable practices to decrease the costs for families in relation to schoolbooks, uniforms, IT and sport equipment.

The Student and Parent Charter Bill

The JMB welcomes the government's intention to enact the Student and Parent Charter Bill. We have long argued for greater coherence in national educational policymaking and we therefore welcome this bringing-together of a clearly articulated set of principles underpinning the relationship between parents and students on the one hand and schools on the other.

In advance of enactment however, JMB would urge the new Minister to consider three philosophical but very important aspects of the provisions.

Firstly, the very essence of the charter is adversarial in its underpinnings. Schools represent perhaps the greatest example of authentic partnership in the life of our country. The family-school axis is founded on the common moral enterprise of educating young people to live a full and rich life, now and into the future. To polarise school and family is to erode and change the character of this partnership and it would be most regretful if this Bill were to change children into customers, parents into challengers and schools into defensive and fearful entities.

Secondly, and arising from its underpinning assumptions, the charter essentially sets out a series of rights but ignores the associated responsibilities. We do not for an instant believe that any parents are unaware of their constitutional and, indeed, moral responsibility to act as the primary educator of their children or that they do not take these most seriously. What is needed however, in parallel to the set of parents' expectations framed in any eventual charter is an equivalent set of expectations a school has a right to be afforded.

Finally, any neutral reading of the set of principles embedded in the proposals would lead one to the conclusion that none of these fourteen areas are comprehended by legislation, regulation or any other imperative. The exact opposite is the case. Our schools operate under a raft of laws, regulations, guidelines, indicators, expectations, compliance frameworks, accountability measures, external evaluation criteria, codes of conduct, self-evaluation procedures, reporting and feedback demands as well as their foundational mission statements and, most importantly, the essential moral agency of Irish educators. Each and every principle framed in the proposed charter is already fully comprehended by an existing self-developed or externally mandated set of demands and none will come as news to school communities already fully engaged with their partner families.

JMB does not argue against the framing of a set of rights in a Parent and Student Charter. The principles, as framed in the draft Bill, represent an ethical framework for parents founded on democratic civic values and setting-out their appropriate engagement in their children's school.

We do, however, have concerns around:

- a failure to recognise that each of these provisions is already underpinned by legislation and regulation and all are well established in schools in our sector
- the erosion of autonomy and potential for micromanagement in what are essentially voluntary sector institutions
- an undermining of the principle of subsidiarity in which decisions are best made at the lowest appropriate level, i.e. by the school community itself
- the emergence of an adversarial culture in the partnership between schools and the families they serve
- a failure to recognise that while parents have a fully appreciated focus on their own child's situation, the education and safety of the whole cohort of students must remain the overarching focus of school authorities
- broad new uncircumscribed powers afforded to the Ombudsman for Children
- no identification of responsibilities associated with the Charter's set of rights
- no recognition that schools in the voluntary sector are obliged to seek 30% of their funding from hard-pressed families, and,
- the potential for the emergence of additional layers of bureaucracy in already overwhelmed schools

JMB remains available to engage in further detailed consultation on this important piece of legislation and looks forward to supporting the development of a regulatory framework underpinning the authentic partnership already in place in our schools.

RECOMMENDATION:

- **In advance of its enactment, the JMB would urge the Minister to carefully consider the provisions of the Student and Parent Charter Bill – or at least the regulations that will follow its passing into law – in terms of its balance of rights and responsibilities, implications for principals' workload and possible unintended consequences.**

The Cost of Schooling on Families

The JMB notes the issuing in 2017 of the Department's Circular setting-out a range of directives around school uniforms and book rental schemes. The intended focus on affordability and value for money for parents is, of course, already a consideration our school communities take into account when setting-out their uniform and textbook policies. What was new in this Circular was a proposal to provide lesser capitation funding to schools not adhering to the particular operational model set out by the then Minister.

Voluntary secondary schools already operate under an inequitable funding regime and must look to parents to make up the shortfall in financial resourcing when compared to other sectors. We agree with the conclusion of Barnardos in their School Costs Survey 2017 that:

‘The Department is still failing to realise that an increase in basic funding for primary and secondary schools will reduce this need for voluntary contributions to be paid’.

It is the JMB position that it is this inequity which should be addressed in the first instance and that to penalise already underfunded schools is not alone discriminatory but is contrary to the Department’s own thinking on enhancing school autonomy.

The fact is that all voluntary secondary schools operate under severe funding restrictions and are acutely aware that the families they serve are equally not immune to financial pressures. Instead of attempting to micro-manage schools with punitive measures, the Minister should eliminate the need for schools in our sector to seek voluntary contributions from families, a measure which would immediately and significantly alleviate the pressures on all concerned.

RECOMMENDATIONS:

- **Seed capital and a flexible quantum of teacher hours for administration must be provided to schools for the establishment and operation of school book rental schemes**
- **Guidelines and encouragement, not threats to cut funding, should be offered to schools to review school uniform policies**

Section 5: An Inclusive Vision for Education

From the Programme for Government:

Inclusion in and access to education is the foundation for a more just and equal society. In welcoming everyone to participate in education, they deserve to be treated fairly. In order to support an inclusive and equal education system we will:

Further progress the move towards a needs-based, responsive set of state supports for students with special educational needs and expand early intervention teams in schools over the next five years.

Complete the new DEIS identification model ensuring the extension of DEIS status to schools that are identified as being suitable.

Provide additional supports for students who are homeless, resident in family hubs, or in direct provision.

Ensure resourcing for students who do not speak English as a first language.

Improve access to supports for positive mental health in schools.

Continue to review and expand the roll out of the new Hot School Meals initiative.

Resourcing Recovery for Students with Special Educational Needs

While it is clear that both State and schools remained highly concerned about the fate of students with special education needs during the school closures, there has been clear evidence of a loss of engagement, skills, learning and human connection that will require to be treated with the urgency it deserves once schools continue on their reopening journeys. In addition to the enhanced guidance and counselling provision identified earlier, every school will require a pro-rata increase in its special education teacher (SET) allocation for at least the next two years. We still have not restored the quantum of hours to schools that were lost due to the cutbacks in 2010, and nor have we made any distinct provision for an expanded range of SEN coordination responsibilities which will inevitably inflate once this traumatised and disconnected cohort of students try to re-engage with school life.

As a matter of urgency, the government must increase the SET allocation to all schools by at least 30% and, once and for all, make distinct provision for SEN Coordination. The JMB has repeatedly asserted the need for a dedicated post of SEN Co-Ordinator (SENCO) in every school. Principals' feedback has emphatically asserted the following points:

1. There is absolute unanimity that every school must have a dedicated SEN Coordinator
2. Continuing to find coordination time from within the resource-hours allocation to students is widely seen as unethical and inefficient
3. There is no clarity or advice on the proportion of hours which should be dedicated for SENCO activities
4. SENCOs continually express their sense of being overwhelmed by their demands of the role
5. Principals report being unable to keep a SENCO in the role for any extended length of time, due to the role expansion, admin overload and lack of time
6. Voluntary secondary schools are given no time for duties in their posts of responsibility
7. Principals agree that SENCO time should be given as a flexible but adequate quantum of hours each year

The current practice of taking resource hours away from students for in-school coordination is flawed, insufficient and widely seen as unethical. The JMB demands that the Department immediately provides for SENCO functions as a post of responsibility with time for duties or as a separate, pro-rata allocation of hours to each school.

The commitment to 'make further progress towards a needs-based, responsive set of state supports for students with special educational needs' is welcome. The first phase of this new full-service support model based on the NCSE policy advice of 2017, *'Delivering for Students with Additional Care Needs: The Right Support at the Right Time in Schools'*, was postponed at the beginning of the lockdown. As the then proposal was to implement solely the profile model of SNA allocation to schools without proper trialling, the JMB welcomed the pause. The capacity of school management to both identify additional, often complex, care needs and make resource allocation decisions (a) is already exceeded in terms of an oppressive workload, (b) has never been fully resourced or supported in terms of training and

external advice, and, (c) leaves principals exposed to immediate and *post hoc* challenges relating to their deployment decisions and their consequences. Indeed, schools with significant SNA allocations will need a dedicated person to manage this resource. The administration alone virtually constitutes a senior management role in itself, and the current proposals presume the principal will undertake everything from recruitment, to identification and re-identification of ever-changing of care-need, to deployment, to HR and IR operations, to training and CPD, to conflict resolution, to professional accountability etc. etc.

It is the position of the JMB that the proposed implementation of this model of SNA allocation and deployment be paused until the professional development needs of school leaders, SENCOs, SETs and SNAs have been met; sufficient coordination and administration capacity has been provided to operate the model effectively; the industrial relations parameters relating to current SNA Ts&Cs have been fully resolved, and the voice of families have been heard and comprehended, particularly in relation to the devaluing of clinical judgements and their consequences.

Meanwhile, the recognition of the need for timely and consistent access to occupational, speech and language and behavioural therapeutic services represents both an opportunity and a challenge for the Department. It is the view of JMB that the Minister considers the establishment of a nationwide team of therapists fully within the Department of Education and not outsourced from other Departments such as Health or DCYA. Education requires to be ring-fenced from both capital and current expenditure overruns in other Departments as this full-service model will require (a) to be developed as a long-term, indeed permanent, model of addressing additional care needs and (b) will demand education-specific professional expertise from its growing team of therapists and psychologists.

RECOMMENDATIONS:

- **The landscape of SNA provision has been radically worsened by the Covid pandemic and schools will need at least a 30% increase in SET allocation to mitigate its worst effects**
- **A special educational needs co-ordinator (SENCO) must be appointed to all post-primary schools with a weekly allocation of at least 10% of a school's 'profile hours' (with a baseline threshold of 2 hours per week) to be flexibly deployed by management but ring-fenced to the SENCO and their team**
- **The proposed implementation of a profile-based model of SNA allocation and deployment must be paused until its key backing conditions have been established agreed**
- **JMB urges the Minister to consider the establishment of a nationwide team of therapists fully within the Department of Education and not outsourced from other Departments such as Health or DCYA**

The DEIS School Response

The lengths to which DEIS school leaders and their communities went to maintain student engagement and inclusivity during the pandemic emergency may perhaps never be known.

DEIS principals, most without a second deputy, had to implement every single element of distance teaching and learning provision, school administration, junior cycle reporting, calculated grades administration and all that every school leader had to perform, but also to:

- Completely redesign, administer and arrange for the provision of school meals for hundreds of families across their communities
- Operate remote pedagogy across a school population with little or no appropriate digital infrastructure
- Find ways to support their students with special educational needs – typically well over 50% of their enrolment
- Mitigate the worst effects of lockdown on young people at risk of neglect and/or abuse
- Try to re-establish contact with students who completely disengaged from all school provision
- Provide for book rental scheme operations during a lockdown
- Plan for a Summer Programme to re-engage such ‘lost’ students in advance of re-opening, and this after the school had closed and there was no staff support available

Of all the stress-points JMB experienced during the school closures, it was across our 48 DES principals that the most worrying levels of anxiety, overwhelm and distress were evidenced. It is finally time for this inhuman imposition of un-resourced responsibility to change.

The impact of policy and initiative overload on DEIS schools is but one factor. What is far more concerning is the effect of higher levels of student behavioural challenges due to emotional, social and cognitive-capacity issues which erode the time and energies of the DEIS school leader, particularly in our underfunded and under-staffed voluntary secondary schools. This position will have worsened, if anything, as a result of the school closures.

As an immediate action, we now call for the provision of a second deputy principal in DEIS schools of between 500 and 699 students. JMB urges the new Minister to implement this equity measure for the forthcoming school year, with an extension of the initiative to all DEIS schools from 2021/22.

RECOMMENDATIONS:

- **DEIS school principals worked tirelessly during this pandemic and they must, as a matter of urgency, be provided with acceptable levels of senior leadership support to allow them and their school communities to survive the extreme challenges in the wake of this crisis**
- **We seek, as an immediate action, the provision of a second deputy principal in DEIS schools of between 500 and 699 students, with an extension of this allocation to all DEIS schools from 2021/22**
- **The Department’s reconfiguration of the DEIS scheme must go further to provide for a more equitable framework for addressing disadvantage. The all-or-nothing approach to DEIS inclusion must be reviewed to provide schools with high numbers of students experiencing disadvantage with targeted supports**

Concluding Commentary

From the Programme for Government:

Education is a cornerstone of society and a driver of social equality. Creating new and viable opportunities for young people and those wishing to re-skill is a civic, social, economic and environmental imperative now more than ever.

We will continue to develop our education system to meet the needs of all students and to tackle disadvantage from an early age. We will develop innovative and collaborative approaches to ensure that our education system fosters a love of life-long learning, enables stronger communities, cherishes the environment, contributes to the economy and adds to the health and wellbeing of all learners and wider society.

The educational enterprise elicits some of the loftiest rhetoric from politicians and policymakers alike. This is because the core aim of education, becoming more fully and richly alive, gets to the heart of our shared human endeavour and, in general, when our leaders speak in terms of values and vision, they mean it.

The JMB represents over half the second-level school leaders in the country and we mean it too. The difference, however, is that *we* must implement it.

In these early stages of national recovery from a devastating global pandemic, we absolutely acknowledge the government will need to borrow significantly to invest in Ireland's return to productivity and social cohesion. For our schools, we will need to increase capital investment, provide more special education teachers, guidance counsellors and senior school leaders, better resource our inclusion initiatives and catch up on ICT investment for the new asynchronous education landscape we have been drawn into. The pay-off may not be immediate but it will be significant in the medium term and the JMB will, as ever, engage positively with the Minister and Department officials in policy and operational matters across the spectrum of activity in our sector.

In this submission however, we reflect our anxieties concerning the dissonance between policy and practice, rhetoric and reality in our schools.

Our commentary is made in a spirit of partnership and optimism and we recommend this set of implementable, value-for-money actions as absolutely central to the achievement of growth in our post-Covid economy, stability in our society and hope for the future. As the late Vaclav Havel said 'Hope is definitely not the same thing as optimism. It is not the conviction that something will turn out well, but the certainty that something makes sense, regardless of how it turns out'.

It makes sense to invest in education and schooling, but it makes even more sense to invest in its leadership because therein lies its true hope.

Finally, and in particular during these extremely challenging times, the JMB wishes to record our appreciation for the respectful and collegial working relationships that exist between our organisation, its member schools and the various officers and sections within the Department. The commentary in this submission is set out in a spirit of cooperation in light of our common focus on the quality of our country's educational service. We will be happy to

expand on any element of this set of recommendations and look forward to working with the new Minister and her officials into the future.

John Curtis, JMB General Secretary

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