



**Comhairle na Gaelscolaíochta Submission to
Draft Special Education Strategic Area Plan (SESAP)**

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Introduction – About us

Comhairle na Gaelscolaíochta was set up in 2000 by the Department of Education with the following aims:

1. To promote, facilitate and encourage Irish-medium Education and Irish-medium schools;
2. To do this in a planned, educationally efficient and cost-effective way.

Our vision is the establishment of a network of vibrant, viable Irish-medium schools, from preschool to post-primary, providing excellence in education, at the heart of developing Irish Language communities.

Our mission is to contribute to the development of vibrant Irish-speaking communities by ensuring access to high quality Irish-medium education to those who desire it.

What we do:

1. Assist parents who wish to establish Irish-medium provision in their area;
2. Plan for the creation of new Irish-medium schools;
3. Promote standards of good practice in Irish-medium schools;
4. Co-ordinate the activities of all those involved in Irish-medium Education;
5. Represent the Irish-medium sector at all levels;
6. Promote Irish-medium Education to the Dept of Education, Education Authority, Council for Catholic Maintained Schools, CCEA and other bodies;
7. Provide advice, assistance and information in relation to Irish-medium Education to those who need it and to groups seeking to establish Irish-medium schools and units.

How we do this?

Comhairle na Gaelscolaíochta promotes Irish-medium Education in the community, encourages parents to establish Irish-medium provision, and endeavours to ensure children have access to Irish-medium Education at pre-school, primary and post-primary level.

Draft Special Education Strategic Area Plan (SESAP)

Comhairle na Gaelscolaíochta submitted recommendations to the Education Authority in relation to the development of the above Framework in August 2021. As a result of this engagement, acknowledgement was made of some of the specific needs of the IM sector, in the final version of the framework;

‘The EA is seeking to put in place an ambitious programme to provide pupils and parents with a greater level of equity in the availability of specialist provision in mainstream schools across the region. This will provide greater access to inclusive educational opportunities for pupils with a statement of special educational needs **by addressing the geographical, sectoral and linguistic sector inconsistencies which currently exist, particularly in the Irish Medium sector. (:7)**

(See also Criterion C below, for reference to ‘sectoral need’.)

The explicit references contained within the Framework, however, are absent from the draft SESAP and only the following remained:

- ‘Supporting Integrated and Irish Medium Education- Area Planning will seek to identify, explore and bring forward proposals to encourage and facilitate both Irish Medium and Integrated education to provide specialist provision in mainstream schools to meet the needs of pupils within an area. Both Comhairle na Gaelscolaíochta and the Northern Ireland Council for Integrated Education will provide guidance on how best to meet that need working with all education partners.’ (3.2.2)
- ‘Encourage and facilitate the development of specialist provision in the Irish Medium Sector’ (:16)
- ‘The Department has a duty to ensure that its Arm’s Length Bodies effectively deliver the full suite of education policies. The Education Authority in its duty to plan for special education provision will assist the Department, through their planning activities, to exercise these duties’. (*Statutory Duties for Shared Education, Integrated Education and Irish Medium Education, Annex A.*)
- Irish Medium Education; Under Article 89 of the Education (NI) Order 1998 there is a duty to encourage and facilitate the development of Irish Medium Education. Area Planning will seek to identify, explore and bring forward proposals to encourage and facilitate Irish Medium Education to provide specialist provision in mainstream schools to meet the needs of

pupils within an area. Comhairle na Gaelscolaíochta will provide guidance on how best to meet that need working with all education partners. (*Policy Landscape, Annex A*)

Key Points

- There are currently no permanent Specialist Provisions in Irish-medium schools, **profoundly impacting on Irish-medium pupils' access to linguistically appropriate intervention**. Two temporary 'resource provisions' have been established in Scoil na Faiseoige and Coláiste Feirste. These temporary arrangements, while incredibly important, are far from satisfactory as there is no continuity of provision for SEN children as they move through the school. This provision also needs to be expanded, in particular to cover areas outside of Belfast.
- The Review of Irish-medium education 2008, stated: *'The (Education and Skills) Authority should develop the capacity to meet the special educational needs (SEN) of children through the medium of Irish where possible' (xix)*
- Numbers in Irish-medium schools are increasing at a faster rate than in any other sector; CnaG research demonstrates that in the next five years, the IM Primary sector will grow by c.19 % and the IM Post-primary sector will grow by c.55 %, based on historic growth projections, yet there is still no permanent specialist provision for these pupils.
- According to the data provided by DE, the incidence of Special Educational Needs is slightly higher than in English-medium (22.4% for Irish-medium compared to 19.8% in English-medium)¹
- Additional and specialist IME teachers will need to be trained and recruited to meet this growing demand.
- There is evidence that children with SEN in IME have had to switch to English-medium to access Specialist Provision. In our view, this is entirely inconsistent with the Statutory Duty to 'encourage and facilitate the development of Irish-medium education'.
- As the fastest-growing sector in education currently, CnaG asserts that a regional network of permanent specialist provision is established, to cater for the projected and specific needs of the IM cohort. Whilst we

¹ Significant research is required as to why this differential exists and how current gaps in provision can be filled to effectively support IM pupils with additional needs. The Irish-medium sector does not have access to appropriate diagnostic tools and does not avail of support services that are fit-for-purpose in an immersion setting. However, recent publications suggest that the immersion context is not detrimental to SEN pupils and can in fact be advantageous.

welcome the fact that there are more than 93 permanent specialist provisions catering for the English-medium sector, it is a matter of ongoing concern and frustration that there are currently no permanent provision serving Irish-medium education, over 50 years after the first Irish-medium school was established and in spite of numerous recommendations urging action on this.

IME Early Years;

While the IME sector has a vibrant and growing pre-school phase, including 17 nursery units and 29 pre-schools, there is no provision for those children with SEN in the IME early-years sector. Principals have raised this as a major and ongoing concern. Lack of appropriate provision in IM nursery schools has led to families reluctantly leaving the IM sector, again contradicting Justice Treacy's contention in 2011 regarding the statutory duty that '*the obligation is not only to take positive steps to encourage Irish-medium education but also to remove obstacles.*'

The early immersive model is central to the development of bilingual children who can access the curriculum fully throughout their school journey. This immersive model also facilitates early identification of children with additional learning needs, however, the absence of any specific SEN support in IM Early years severely restricts the ability to adequately deal with it. Recent research has highlighted **the suitability of IME for all children with SEN:**

'Thus, from the findings of the present study, it can be suggested that pupils with SEN learning through a L2 can benefit from immersion education in the same ways as children without SEN. This is an important finding as the suitability of this form of education for pupils with SEN has been questioned, particularly by external educational professionals (Yu, 2013, 2016). This research adds to the empirical evidence available to parents, teachers, schools, and professionals regarding the suitability and perceived benefits of immersion education for all pupils.' (*The Additional Supports Required by Pupils with Special Educational Needs in Irish*, PhD Thesis; Sinéad Andrews, 2019)

It is significant that in their publication '*A resource for schools to help children who have or may have, Special Educational Needs; Speech, Language and Communication Needs*' (2021) the Intercultural Education Service made specific reference to strategies for bilingual children as follows:

'Don't test children through the use of assessments standardised on monolingual speakers of English.' (:57)

Criteria

Regarding the criteria which are proposed to decide where future Specialist Provision will be located, CnaG highlights the following issues:

- *Strong leadership and management*: appropriate support must be given to IM schools that are still relatively young and to IM principals who are early in their careers – this occurs more frequently in the comparatively younger and faster-growing IM sector and should be adequately supported.

- *Accessibility and Accommodation*; this criterion has serious implications for IM schools and is potentially restrictive to growth and availability of specialist provision.

What is a reasonable distance in an IM context with the wide geographical spread of schools? Does this criterion mean IM pupils would potentially miss out on a place in specialist provision due to distance?

(The Framework document was amended to include the following 'Pupils requiring a specialist provision place can access this within a reasonable distance and travel time across both urban and rural areas in line with Schools for the Future: A Policy for Sustainable Schools. Specialist provision in mainstream takes account of both pupil and **sectoral need recognising the DE's duty to facilitate and encourage both Integrated and Irish Medium education.**')

- *Accommodation should be fit for purpose* – 60% of IM schools are located in temporary and modular buildings. The majority of this 60% and those other IM schools located in permanent buildings fall well below Department of Education handbook standards without the required ancillary accommodation that most English-medium schools take for granted, such as sports halls/ assembly halls, library & resource areas; staff rooms and on-site sports facilities. These settings should not be punished for DE's lack of investment in appropriate accommodation.
- *Inclusion*- whilst all IM schools have a clear commitment to inclusion and a strong ethos in supporting SEN they are inhibited by external agencies and lack of support in an IM context, again through no fault of their own.

- *Community Links- the school is part of a network of specialist provisions* - this network is not available to majority of IM schools. Strong links within the community exist but where an EM pupil can avail of support services via a school network, through the medium of English, these same services are not available through the medium of Irish and this criterion should not penalise IM schools as a result of factors outside of their control.
- *Stable enrolment trends (non-composite classes)* This criterion potentially discriminates against the Irish-medium sector which is a growing but still relatively young sector, where composite classes are often essential in achieving sustainability. Stable enrolments are also affected by a school's physical capacity to admit more pupils and this is the case currently in many IM schools, where there is not the capacity to increase enrolments due to restrictive accommodation and facilities.

(A series of **indicators** were also discussed in the Framework document which schools need to satisfy prior to consideration for specialist provision. There is only a brief reference to them in the Draft SESAP but CnaG's response has been included in the appendices below for information.)

We believe that a bespoke approach is needed for the development of specialist provision for IME, which should consider the relative youth of the sector; the unique and specific linguistic requirements of IME; the urgent issues surrounding suitable school accommodation and teacher supply and the wide geographical spread of IM schools in the region. There were general commitments made to this end in the Framework for Specialist Provision in Mainstream Schools and it is essential that this is reflected in the final SESAP document.

A Fair Start

The Expert Panel on Underachievement made reference to issues in IME that were impacting on our pupils' risk of underachievement:

“The panel met with representatives of Comhairle na Gaelscolaíochta and is cognisant of the statutory duty of the Department of Education under the Education (Northern Ireland) Order 1998118 to “encourage and facilitate the development of Irish-medium education”. The panel acknowledges that this is a fast growing sector totaling almost 7,200 pupils across 28 primary schools, 2 post-primary schools, 18 nursery units and 25 pre-schools, as well as 11 Irish medium units. There is also clear evidence that the Irish Medium sector has a disproportionately high number of socially and educationally disadvantaged pupils: around a third of Irish Medium primary schools are located in the top 100 most deprived SOAs; Free School Meal entitlement is higher than in English Medium schools at both primary (35% vs 28%) and post-primary (44% vs 27%) level; and there are more children on the SEN register in Irish Medium schools (21.9%) than in English Medium schools (19.3%). As the sector grows, there is a need to ensure that high quality resources and TPL opportunities are made available for the sector, and that there is greater focus on encouraging more Irish speakers to enter Initial Teacher Education, to ensure that the needs of children at risk of underachievement within the Irish Medium sector are fully met.”

In addition to the general points made below, we would like to draw your attention to specific questions within the SESAP consultation that provide an opportunity to reinforce the need for specific, Irish-medium appropriate, specialist provision.

Question 6 asks;

*To what extent do you agree or disagree that the **Vision** of the draft Plan reflects the aim of area planning for Special Schools and Specialist Provision in Mainstream Schools to ensure pupils have access to a placement that best meets the needs of children and young people with a Statement of Special Educational Needs?*

(The Vision is: All pupils in Special Schools and Specialist Provision in Mainstream Schools have the opportunity to achieve their full potential; by having the best educational experiences, equality of opportunity and pathways that meets their needs.)

- **A placement that best meets the needs of an IM child with a statement of SEN, is in IM Specialist Provision; parents shouldn't have to choose between Specialist Provision and Irish-medium education.**
- **Similarly, 'equality of opportunity' for an Irish-medium child, means intervention in the language of instruction i.e. Irish.**

Question 8 asks:

To what extent do you agree or disagree that the **Mission** of the draft Plan reflects the aim of area planning for Special Schools and Specialist Provision in Mainstream Schools to ensure pupils have access to a placement that best meets the needs of children and young people with a Statement of Special Educational Needs?

(The Mission is; Focus on meeting the needs of children and young people with a Statement of Special Educational Need. To do this we will provide:

- availability at their nearest suitable special school/nearest suitable mainstream school with specialist provision;
- pupils with equitable access to excellent provision and meets the individual needs of the child or young person;
- pathways of provision for all ages and stages of development;
- special school provision in a single 3-19 school or through collaborative 3-19 provision;
- for changing educational, physical and medical needs;

- for inclusivity, providing opportunities for education alongside mainstream peers.)
- **‘Suitable’ ‘inclusivity’ and ‘equitable’ in this context should mean Irish-medium pathways for Irish-medium pupils.**
- **‘Providing opportunities for education alongside mainstream peers’ should mean that IM children should not be forced to leave the sector to avail of specialist provision.’**
- ***‘A resource for schools to help children who have or may have, Special Educational Needs; Speech, Language and Communication Needs’ (2021) the Intercultural Education Service made specific reference to strategies for bilingual children as follows: ‘Don't test children through the use of assessments standardised on monolingual speakers of English.’ (:57)***

Question 10 asks:

To what extent do you agree or disagree that the four **Key Themes** meet the objectives of Area Planning for Special Schools and Specialist Provision in Mainstream Schools as outlined in Section 2 of the draft Plan?

The 4 Key Themes are:

- Increase parity of access for all to appropriate pathways
- Promote cooperation, collaboration and sharing between all Special Schools and Specialist Provision in Mainstream Schools across all sectors (as appropriate)
- Maximise resources and capacity
- Inform strategic infrastructure planning and investment
- **It is not ‘appropriate’ for a child in an IM school to have to transfer to an English-medium school to avail of Specialist Provision. There needs to be ‘an IM-appropriate pathway’.**
- **Collaboration should be encouraged within the IM sector and suitable training and resources provided for practitioners.**

- **Additional teaching supply and strategy needed to ensure IM schools have adequate and specialist teachers.**

Question 12 asks;

To what extent do you agree or disagree with the **Drivers for Change:**

The Drivers for change are:

- Significant Growth
- Changing Profile of Pupils
- Historic Descriptors of some Special Schools
- Lack of a Consistent Special School Model
- Impact of Additional Specialist Provision in Mainstream Schools
- Capital Funding
- **The IM sector has experienced faster growth recently than any other sector. This must be taken into consideration when planning future Specialist Provision.**
- **There is a higher incidence of SEN in the Irish-medium sector.**

Question 14 asks: To what extent do you agree or disagree with **Creating Opportunities for Change:**

- Collaborative Working
- Supporting Integrated and **Irish Medium Education**
- Supporting Schools and Communities
- Engaging with Governors, Staff, Parents and Pupils
- Clearly Defined Aim, Policy and Statutory Process
- **‘Collaborative working’ must give IM practitioners the opportunity to avail of IM specific training and development of appropriate resources.**
- **Support for Irish-medium education should involve close collaboration with CnaG as the sectoral support body for IME, at all stages of**

planning for specialist provision, including when engaging with pupils, parents, staff and governors.

- **The Statutory Duty for Irish-medium education must be applied in the development of Specialist Provision in mainstream schools.**
- **It must be remembered that the Statutory Duty is intended to have practical consequences and is not to be treated as aspirational.**

Appendix A - CnaG response to proposed indicators

Linkages with other schools; this may not be as easily achieved in an Irish-medium context, particularly in rural areas where an IM school is likely to have no close IM neighbour. To preserve and enhance the immersion ethos of IME, it is essential for pupils to spend as much time as possible in an Irish language-rich environment.

1.5 The quality of the physical environment for learning and teaching i.e. the condition, energy and water efficiency and suitability of the buildings. Around 60% of Irish-medium school buildings are in modular or temporary accommodation, or in buildings that were not designed for use as schools. This indicator, therefore, could have serious implications for a sector with such a high percentage of unsuitable accommodation and facilities, factors which the schools themselves, have no control over.

2.2 Composition of Board of Governors – skills and experience of Board members and number of vacancies. It has traditionally been difficult in the Irish-medium sector to identify suitable Governors with the requisite range of skills and experience, given the relative youth of the IM sector and inexperience of the current Governor cohort. This should be taken into consideration.

2.4 Levels and nature of staff turnover and unfilled staff vacancies- this indicator is unreasonable in the context of the well-documented issues around teacher supply in the Irish-medium sector.

2.7 Leadership and Management Roles- In a comparatively young sector, with many relatively inexperienced leaders, time is needed for the proper development of leadership and management roles.

2.9 Professional Development of Staff-agree in principal though Irish-medium teachers do not have access to the same professional development opportunities as their English-medium peers.

4.1 Commitment to work within a common training framework- for future specialist provision within Irish-medium schools, this training must be relevant to the needs of Irish-medium pupils.

5.1 The school is part of a network of specialist provisions-in a geographically isolated Irish-medium school, of which there are many, it may not be possible to form part of such a network. This should not exclude Irish-medium schools

from acquiring specialist provision. This is also the case for 5.3-a school should be part of an SEN cluster or local network-these networks do not exist in the IM sector.

6.1 A school should be in a 7 class base-this discriminates against the relatively young IM sector, where composite classes are often a reality in achieving sustainability. Similarly for indicator 6.2, a post-primary school should have 500 pupils, this discriminates against the small but growing IM post-primary sector and would effectively rule out 4 of 5 current IM post-primary providers.