



JMB Submission on The Re-opening of Schools and Leaving Certificate 2020 to the Oireachtas Special Committee on Covid-19 Response

Introduction

The Joint Managerial Body/Association of Management of Catholic Secondary Schools (JMB/AMCSS) welcomes the invitation from the Oireachtas Special Committee to present a submission on the re-opening of schools and their experiences of Leaving Certificate 2020.

Who we are

The Joint Managerial Body (JMB) was founded in 1972 to represent the interests of all voluntary secondary schools in the Republic of Ireland. It is the main decision-making and negotiating body for the management authorities of over 370 voluntary secondary schools. The JMB comprises two founding organisations: AMCSS, the Association of Management of Catholic Secondary Schools and the ISA, the Irish School Heads' Association, representing the Protestant Schools in the State.

THE REOPENING OF SECONDARY SCHOOLS

1. Challenges for re-opening of schools and procedures that will need to be put in place

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. 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**

2. How schools will operate under social distancing

(a) Impact on teachers and other staff

The JMB is supporting schools in the development of a Covid Response Plan to support the staff and Board of Management in putting measures in place that will prevent the spread of Covid-19 in the school community.

The plan incorporates current advice about measures to reduce the spread of Covid-19 in the community issued by the National Public Health Emergency Team (NPHE). Each Board of Management wants to ensure that any proposals and recommendations in relation to the resumption of teaching and the reopening of facilities comply with best guidance as provided by the Governments and the national health agency. As the advice issued by NPHE continues to evolve, this protocol and the measures management and staff need to address may also change.

A Covid Response Plan aims to provide details of:

- Return to work roadmap
- Return to workplace safely, personal responsibility and Lead Worker Representative(s)
- Safety Statement and Risk Assessment
- General advice to prevent the spread of the virus
- Procedure for Returning to Work
- Control Measures
- Dealing with a suspected case of Coronavirus
- Staff Duties
- Sick Leave and absence management

- Employment Assistance and Wellbeing Programme

Where schools are reopening in August 2020, all employees will be required to complete a 'Return to Work Form'. This RTW Form will be sent out to each employee in advance of the school opening.

All staff will undertake and complete online Covid-19 Induction Training prior to returning to the school campus. The aim of such training is to ensure that employees have full knowledge and understanding of the following:

- Latest up to-date advice and guidance on public health
- Covid-19 symptoms
- Very high risk and high-risk groups
- What to do if a staff member develops symptoms of Covid-19 while at work
- Outline of the Covid-19 response plan and details of control measures and health and safety requirements
- Identification of points of contact

Staff should be fully informed of the control measures and their duties and responsibilities in preventing the spread of Covid-19 and kept up to date with any changes to the control measures and any changes in the guidance available from the public health authorities.

Staff have a statutory obligation to take reasonable care for their own health and safety and that of their colleagues and other parties. In order to facilitate a safe return to work, these duties include, but are not limited to, the following:

1. Adhere to the Covid-19 Response Plan and the control measures outlined. The cooperation and assistance of all staff is essential to reduce the risk of spread of Covid-19 and to protect health and safety as far as possible within the workplace. All staff have a key role to play
2. Coordinate and work with their colleagues to ensure that physical distancing is maintained, and office capacity limitations are complied with
3. Make themselves aware of the symptoms of Covid-19 and monitor their own wellbeing
4. Self-isolate at home and contact their GP promptly for further advice if they display any symptoms of Covid-19
5. Not return or attend school if they have symptoms of Covid-19 under any circumstances.
6. If they develop any symptoms of Covid-19 whilst within the school campus, they should adhere to the procedure outlined in Section 8 above
7. Complete the RTW form before they return to work and fully comply with the Return to the Workplace Safely Procedure
8. Must inform the Principal if there are any other circumstances relating to Covid-19, not included in the form, which may need to be disclosed to facilitate their safe return to the workplace
9. Must complete online Covid-19 Induction Training and any other training required by the Board of Management prior to their return to work
10. Must be aware of, and adhere to, good hygiene and respiratory etiquette practices
11. Keep informed of the updated advice of the public health authorities and comply with same.

RECOMMENDATION:

While the JMB will support its member schools with the best possible advice and protocols, what we cannot do is resource them. It is the responsibility of government to provide the human and financial resources to ensure that the Covid Response Plan can be implemented without equivocation in every school

(b) Impact on students

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**

3. Impact on special needs education

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**

4. Impact of Staggered Attendance: Asynchronous Teaching and 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**

LEAVING CERTIFICATE 2020

The decision to cancel the written Leaving Certificate examinations, set for July/August 2020, was welcomed by the JMB and its member schools. The emergence of a model for the issuing of Calculated Grades to candidates was as remarkable as it was problematic. Indeed, JMB commends the Department and the State Examinations Commission on their highly collaborative approach to the development of this alternative model. Authentic engagement of all stakeholders in this provision, along with emerging policy relating to distance teaching and learning, junior cycle reporting, school meals provision and summer programmes, to name but a few, was central to the success of each initiative during this crisis.

JMB meanwhile remained in close contact with school authorities during the Calculated Grading process, as well as engaging at the highest levels of policymaking throughout. We surveyed our members to determine their key anxieties, engaged in a series of virtual

consultation meetings with the entire membership, maintained an online website information and updating service and engaged, as ever, with individual schools on a day-to-day basis.

Among the headline initial concerns identified by school management were:

1. Managing individual subjects
 - a) Students changing levels
 - b) Second components
 - c) New LC subjects
 - d) Subjects studied outside school
 - e) Non-curricular languages
2. Impact of GDPR
3. Leaving Certificate Applied (LCA 1 and LCA 2)
4. Work completed since March 12th
5. RACE, HEAR and DARE
6. Candidates
 - a) Students who have been absent from school if entered for LC
 - b) External candidates
 - c) Students who opt to take written exams
7. Individual Teachers
 - a) Anxieties around carrying out the process of estimated percentage marking and ranking of students
 - b) Training needs
8. Subject Alignment Meetings
9. Oversight
10. Inputting of Data
11. The appeals process
12. Impact of the Bell Curve
13. Communication and canvassing
14. Timelines and deadlines
15. LCVP portfolios
16. External agencies and analytical companies
17. FET Queries
18. Impact of LC 2020 on LC 2021

At school management 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. Amongst the most intractable concerns were issues relating to the grading of non-school and absentee students, those taking non-curricular languages with no tuition or those taking subjects outside of school, for example in grind schools.

School authorities were nonetheless generally satisfied with the manner in which their teachers cooperated with the CG process. There yet remains a degree of anxiety around the fairness of the final outcomes, its impact on the transition to candidates' next life-phases and the scale of appeals that may emerge.

RECOMMENDATION:

JMB expects that a full and independent review of the entire process will be undertaken to identify the key lessons for policymakers and practitioners alike, and to inform the national conversation emerging around new developments at senior cycle.

Concluding Comments

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 her Department officials in policy and operational matters across the spectrum of activity in our sector.

John Curtis, JMB General Secretary

July 2020