



## **Fórsa Response to the NCSE Comprehensive Review of the Special Needs Assistant Scheme**

**29<sup>th</sup> March 2019**

## Overview

On 27<sup>th</sup> March 2019 the Government announced a pilot scheme in some 70+ schools to trial a new Schools Inclusion Model based on the recommendations included in the NCSE Review of the role of the SNA. Those recommendations included -

- Replacing SNAs with new Inclusion Support Assistants
- An enhanced role with responsibility for delivering therapies and care to students including those with complex needs within a continuing support framework
- A new educational framework for staff at QQI level 6
- Frontloading SNA allocations to schools based on new criteria
- New assessment models to meet the needs of students

Following the publication of the NCSE Review Recommendations Fórsa conducted a wide ranging consultation and research exercise encompassing over 4,000 SNAs to ascertain their perspectives on the suggested changes to their role and the delivery of student supports in the school setting. This response sets out their views and the position of Fórsa to the proposed changes to be piloted in accordance with the decision announced by the Minister for Education and Skills.

Fórsa recognises the need to review the Statutory Scheme and the ongoing role of the SNA. We understand and agree that the primary purpose of the provision of supports to students must be based on a model of social inclusion requiring a range of specific and general supports and interventions aimed at improving the student experience, maximising potential, meeting complex needs and improving outcomes.

We believe that the time is right to bring clarity to SNAs on what the education system requires from them and to establish a pathway towards a new professional role for SNAs in our schools, a role that is clearly defined, respected within the school community and fairly remunerated.

Our research project reached over 4,000 SNAs and highlights the significant lack of trust amongst the body of SNAs who fear that they will be subject to change without consultation. This trust has to be regained by the Department of Education and Skills, the NCSE and also by local schools. The only way this can be achieved is through adopting an agenda of respect, open dialogue and fairness towards existing SNAs.

## Introduction

The National Council for Special Education (NCSE) was established to improve the delivery of education services to persons with special educational needs. It is tasked with allocating the necessary level of SNA support to schools. In 2016, the then Minister for Education, Richard Bruton, requested the NCSE to undertake a comprehensive review of the SNA role. The report was published in 2018.

Since 2006, the number of SNA posts has almost doubled from 8,390 to 15,000 today. This has made it possible for some 34,600 students in 4,000 schools to attend school. This support varies from student to student and always with the goal in mind of ensuring that students develop their independent living skills to the greatest extent possible.

In 2018, the NCSE published Comprehensive Review of the Special Needs Assistant Scheme. (<https://ncse.ie/wp-content/uploads/2018/05/NCSE-PAP6-Comprehensive-Review-SNA-Scheme.pdf>)

Fórsa, the largest representative body for SNAs in the country representing close to 10,000 SNA members, expressed our concerns that neither SNA's as a staff group or their trade union were consulted in any way by the NCSE when the report was compiled.

It is therefore critical that both the NCSE and the Department of Education and Skills now honour their obligations to discuss, consult and agree any changes to the SNA role, any new educational requirements and any necessary changes to contracts of employment.

Over the course of November/December 2018, through a combination of a series of meetings and surveys, Fórsa collated the views of 4,000 SNAs on the NCSE report and its recommendations. We can therefore speak with authority on the views of SNAs in relation to the recommendations. This paper serves to outline the results of this exercise.

The NCSE recommendations may involve significant changes to work practices, conditions and reporting relationships. It is therefore a necessity under the terms of the Public Services Stability Agreement to have full discussions with the representative unions pending any such changes. The Department of Education sets the terms and conditions of employment for SNAs. Discussions concerning any proposed changes will therefore need to take place with the Department.

Thousands of students are able to attend mainstream education each day because of SNAs. The NCSE recommendations potentially provide an opportunity to have the SNA role properly recognised for the important and vital work they carry out day by day, student by student. There is an opportunity in the NCSE recommendations to ensure that SNAs have the supports that they require in order to meet the care needs of the children with whom they work. This is, as the paper will highlight, about fairness.

Over the course of the last 20 years, the Irish education system has done a remarkable thing. It has prioritised access to the education system for as many students as possible with SNAs as the cornerstone of the approach. Therefore, SNAs understand the important role that the State has tasked them with and we will approach any related negotiations with that in mind.

## Executive Summary

The full implementation of the NCSE Review Recommendations across the schools sector would result in the abolition of the Special Needs Assistant role and replacing those posts with new Inclusion Support Assistants, required to hold a QQI Level 6 qualification to equip them to undertake an enhanced role.

It would be inconceivable for such a significant change in the role, function and status of Special Needs Assistants without corresponding significant changes to the level and nature of the remuneration provided by employers. Fórsa will now commence work on analysing the proposed role and responsibilities to ensure that if and when SNAs transfer to new roles appropriate adjustments are made to their pay including consideration of a new grade to be established in line with other comparable professional groups.

Fórsa recognises the need to review the Statutory Scheme and the ongoing role of the SNA. We understand and agree that the development of the role of the SNA must be based on model of social inclusion, requiring a range of specific and general supports and interventions aimed at improving the student experience, maximising potential and improving outcomes.

We believe that the time is right to bring clarity to existing and future SNAs on what the education system requires from them and to establish a pathway towards a new professional role for SNAs in our schools, a role that is clearly defined, respected within the school community and fairly remunerated.

Approximately 4000 SNAs participated in Fórsa's NCSE engagement in relation to the 13 NCSE recommendations. Approx. 1,000 attended 'roadshow' meetings and an additional approx. 3,000 completed a comprehensive online survey.

The following is a summary of the findings:

1. Fórsa members do not object to any potential programmes or interventions that would benefit students. However, further clarifications are needed before formal engagement on this matter can take place. (See NCSE Recommendation 1)
2. The manner in which specific recommendations could impact on terms and conditions and on training needs to be better understood. (See NCSE Recommendation 2). All too often the SNA hears of decisions after the event, this significant changes must be negotiated with Fórsa.
3. A comprehensive support scheme for CPD must be agreed that includes access to funding for SNA CPD, adequate time off to undertake CPD, formalised positions on any related travel and subsistence required to attend CPD training, assurance that CPD will be accredited and, where a course takes place outside of normal work hours, the ability to take that time off in the form of annual leave. Any training developed to meet 'additional care needs' should include necessary safeguards and assurances for SNAs. (See NCSE Recommendation 2)

4. SNAs are against the title 'Inclusion Support Assistant'. SNA's preferred option is to continue with the SNA title. They are, however, willing to participate in a process to consider alternatives if it is necessary. (See NCSE Recommendation 2)
5. Fórsa gives a cautious welcome to the proposal to 'frontload' SNAs into schools as it potentially opens up the door to ensuring that SNA jobs have more permanency than the current child centered approach. However, more detail is needed on this proposal. (See NCSE Recommendation 3)
6. It is an important premise that the 'review' mechanism for the 'frontloading' model is not allowed to reverse any job permanency improvements achieved. (See NCSE Recommendation 3)
7. It should be ensured that funding for additional staff to build in additional numbers as outlined in the recommendation includes additional funding for SNAs. (See NCSE Recommendation 4)
8. It needs to be ensured that, where baselines for SNA allocations are referred to (i.e., 1 or 2 allocated to a class) they equate to one or two people. Circumstances where, for example, an allocated post is made up of fractions of other SNA posts should not be allowed to continue. (See NCSE Recommendation 5)
9. A clearly-understood delineation of responsibilities is needed to understand the SNA role in relation to the other professions involved. (See NCSE Recommendation 6)
10. There will need to be consideration as to how the recommended revisions and professionalisation of the SNA role will effect SNA remuneration. (See NCSE Recommendation 7)
11. It is important to ensure that SNAs are not asked to take on duties that clearly and demonstrably belong to other professions. (See NCSE Recommendation 7)
12. The development of clear protocols on what is meant by 'Complex Medical Needs' and 'challenging behaviour' is appropriate. However, such a protocol must be developed inside forums that allow for full engagement and for disagreements to be resolved before publication. (See NCSE Recommendation 7)
13. SNAs should be represented in the oversight, monitoring and evaluation of their role, including the review of the methodology underpinning the frontloading of supports. This clearly has industrial relations implications and, therefore, the appropriate resolution mechanisms will need to be in place beforehand. (See NCSE Recommendation 8)

14. SNA representatives should be part of the drafting process of any such guidelines and that such guidelines are discussed, prior to publication, in a forum competent to identify and resolve potential industrial relations issues. (See NCSE Recommendation 9)
15. It is important that SNAs are part of the consultation phase suggested in the recommendation. (See NCSE Recommendation 10)
16. Fórsa believes that as part of the professionalisation of the SNA role, a pathway to the eventual introduction of the appropriate professional level of qualification is required. Engagement is needed to ensure that the value of the experience of existing SNAs is recognised as a qualification in its own right while, on the other hand, a pathway to introduce a level 6 qualification in the short to medium term and a level 7 qualification in the medium to long term should be agreed. (See NCSE Recommendation 11)
17. A full and robust consultation phase is a necessity. It is also a requirement under the Public Service Stability Agreement. (See NCSE Recommendation 12)
18. A standing industrial relations forum should be established at which consultations can take place both now and post-implementation to ensure that issues can be addressed easily. (See NCSE Recommendation 12)
19. A clear dispute resolution mechanism to assist the consultation process should be agreed before the consultation process begins. (See NCSE Recommendation 12)
20. Fórsa does not believe it appropriate for the NCSE to be involved in matters that affect the terms and conditions of employment of SNAs. (See NCSE Recommendation 13)

## Fórsa methodology

The first phase of the initiative was to schedule a national roadshows to facilitate members with the opportunity to record their views on all 13 recommendations as listed in the “Comprehensive Review of the Special Needs Assistant Scheme”.

Meetings were county based and, where possible, a member of the branch from that specific geographical area attended. All meetings took place in the evening. The structure was as follows:

- Attendees were brought through each recommendation
- Attendees were then asked what their views were on each recommendation, what clarifications they sought and had they any additional comments that they would like to share.
- Responses were recorded and, following the meeting, the notes were typed and circulated back out to attendees.

In advance of county meetings, all members in that county were emailed and advised of when and where the meetings were to be conducted. Members were asked to familiarise themselves with the report in advance of the meeting.

Each session took approx. 2.5 hours, dependent on turnout and engagement. All sessions were chaired by either a member of the Branch or indeed the assigned Organiser. In the majority of roadshows either the Lead Organiser or the Assistant General Secretary was in attendance.

Attendees were briefed on what the objectives of the meetings – specifically that the union was not here to explain the content of the review but merely to record members’ views on the content of the report.

Following each session, attendees received the written report of their specific session. In total 28 sessions were conducted nationally. 1000 SNA’s attended. This initiative commenced in late October 2018 and was concluded by the end of November 2018.

In addition, all members received an electronic survey related to the review report. This additional survey captured additional data relevant to our membership and on general issues within the sector.

## **Recommendation 1: Continuum of Support**

“The NCSE recommends that in line with international best practice, students’ additional care needs are identified and met through a continuum of support framework that includes whole-school, targeted school and intensive school support within an inclusive school context.”

### **SNA Perspectives:**

- All developments concerning the whole area of Special Needs Education is broadly welcomed. However what emerged in the majority of locations was that clarification was to be sought on what exactly the “continuum of support framework” was and what if any, such a model would have on existing terms and conditions as set out by the various circulars.
- Will additional CPD would be made available to SNAs should this model be rolled out?
- Concerns and frustrations were expressed in a large number of locations around the disrespect shown towards SNA’s in existing programmes (through exclusion) and the general lack of appreciation as to what the SNA role entails.

### **Fórsa Position:**

Fórsa members do not object to any potential programmes that would benefit students. However, further clarifications are needed before any formal engagement on this matter can happen.

In particular, how such a recommendation could impact on terms and conditions and on training needs to be better understood.

It is important for the professional role of SNAs to be recognised in such an approach and barriers that currently exist that disallow SNAs from being seen as integral to school communities must be identified and removed.

This includes instances where SNAs are given lesser considerations under certain schemes and protocols than other members of the school community in areas including, but not limited to, considerations and supports needed for attendance at training events and the ability to serve on school Boards of Management.

## Recommendation 2: Range of Support Options

The NCSE recommends that:

- A broader range of support options is made available as part of whole-school, targeted-school and intensive-school support, which encompasses and enhances the existing extensive support options already in place in schools.
- NCSE establishes ten fully staffed regional support teams to build school and teacher capacity through continuing professional development (CPD) programmes and where appropriate, in-school support.
- The title 'inclusion support assistant' is used to describe the role of additional in-school support staff that is focused on developing student independence and resilience. From now on existing special needs assistants (SNAs) should be called inclusion support assistants and the term SNA should no longer be used.

### SNA Perspectives

This particular recommendation raised a range of concerns and issues with attendees nationally that they felt needed clarification before they could engage with programmes. Specifically SNAs felt that their current level of training, experience and expertise was not taken into consideration nor recognised in the report (nor in general).

With regard to the CPD element of the recommendation, attendees broadly felt that this was a positive development but only in the context that SNA's should be included in same and that this should be paid and provided by employers during school time. Once again they felt excluded from the process as the recommendation does not specifically reference SNAs with regard to the CPD element of same.

With regard to the "Inclusion Support Assistant", it is fair to say that unequivocally this proposed was rejected at all of the physical meetings (a poll was taken at majority of meetings).

The primary reasons for this were on the grounds that they, SNA's had fought long and hard for recognition and a title and to change it was only a step backwards. Additionally title familiarity amongst parent and society as a whole was a key issue for them as they felt that the title adequately "defined" their position.

Overwhelmingly there was frustration once again at the lack of consultation which notably was interpreted as disrespect for their role on behalf of the NCSE. Concerns were expressed around the use of "Inclusion support" stating that its non- specification could lead to misuse and abuse i.e. "we could be used across a range of classes with all students". Furthermore there was some discussion about whether this title was appropriate for SNAs in all types of schools (i.e. mainstream vs special schools).

It is encouraging to note that, although recommended by the NCSE, the title Inclusion Support Assistant has not featured in the Government proposal.

## **Fórsa Position**

A comprehensive support scheme for CPD must be agreed that includes access to funding for SNA CPD, adequate time off to undertake CPD, formalised positions on any related travel and subsistence required to attend CPD training, assurance that CPD will be accredited and, where a course takes place outside of normal work hours, the ability to avail of appropriate study leave.

SNAs are against the title 'Inclusion Support Assistant'. SNA's preferred option is to continue with the SNA title. They are, however, willing to participate in a process to consider alternatives if it is necessary.

### **Recommendation 3: Allocation to Mainstream Primary and Post-Primary Classes**

The NCSE recommends that:

- The greater proportion of available inclusion support assistant posts is frontloaded into mainstream primary and post-primary schools for students in mainstream classes on the basis of the school's allocation of special education teachers except in the case of schools that currently have no SNA posts.
- A number of inclusion support assistant posts is made available to the NCSE to address exceptional circumstances that may arise in mainstream schools from time to time.
- The mechanism for frontloading inclusion support assistants into schools should be regularly reviewed and the first review should be carried out no later than two years after its introduction.

### **SNA Perspectives:**

With regard to the "frontloading" recommendation, concerns were raised about the potential impact, either positively or negatively of this recommendation on permanency opportunities for SNAs and, indeed, the overall impact on existing SNA numbers.

Frustration was expressed at the use of Inclusions Support Assistants "as if it's a done deal...again they disrespect us". Furthermore, there was negative commentary on the use of the term "scheme" which, it was felt in a number of locations suggested a temporary scheme and this in itself required clarification.

Additionally further clarification was to be sought on frontloading, the review period and the construct of same, the application of cover, the role of the NCSE, what ratio calculation is to be applied. All of this was to be sought before any agreement or acceptance on this could be concluded.

## **Fórsa Position:**

Fórsa gives a cautious welcome to the proposal to 'frontload' SNAs into schools as it potentially opens up the door to ensuring that SNA jobs have more permanency than the current situation. However, more detail is needed on this proposal.

However, it is an important premise that the 'review' mentioned is not allowed to reverse any job permanency improvements achieved.

It is also important to ensure that the 'ratio' that will be used to assign SNAs to schools based on the number of Special Education Teachers in a school has safeguards built into it to ensure that any significant changes to the role, title or general numbers of such teachers will not impact on the general operation of any agreed ratio.

This recommendation highlights the extent to which SNAs experience precarious employment due to the strict linkage between the SENO recommendations on the provision of SNA hours and the employment or the redundancy of the SNA. Where a school has a continuing need, year on year, to employ SNAs, it is reasonable for that school to then provide permanent SNA posts. The proposal to frontload SNA posts could provide the means to explore and deliver enhanced employment security for SNAs and is a model that Fórsa is willing to discuss with a view to reaching agreement provided the outcomes will deliver a reduction in precarious employment and permanent employment for members.

## **Recommendation 4: Staffing and Funding Package for Special Schools and Special Classes**

The NCSE recommends that given the complexity of needs in special schools and classes (the provision for which is currently provided for separately by the DES and Department of Health) and as a matter of priority:

- The Departments of Education and Skills and Health should jointly discuss and agree a staffing and funding package for special schools and special classes;
- The DES should ensure that NEPS is adequately resourced to provide a comprehensive educational psychological service to all students and all schools where required, including special schools and special classes.
- Funding provision should build in additional numbers of staff on the basis that there may be periods of extended leave required such as maternity, long-term sick leave.

## **SNA Perspectives**

There was a sense in some locations, that this recommendation may provide opportunity for SNAs to achieve professionalisation. However, there was frustration expressed around the lack of mention of the SNA role specifically. Clarification is to be sought on what “adequately resourced” means and how it is to be calculated. In the majority of locations there was a strong feeling that this should cover the SNA grade in all schools and not just special schools and special classes. Concerns were raised as to the possible impact on working hours for SNAs and potential impact on other T’s & C’s. Questions were also asked about the manner in which it is to be funded.

## **Fórsa Position**

It is important to understand from which funding stream SNA-related matters under this recommendation will come.

Fórsa welcomes the recommendation to ensure that NEPS is adequately funded.

It should be ensured that funding for additional staff to build in additional numbers as outlined in the recommendation includes additional funding for SNAs.

Should this recommendation lead to additional and appropriate work for SNAs, it is important to get agreement to ensure any related additional training needs will be provided and resourced.

## **Recommendation 5: Allocation to Special Schools and Special Classes**

### **Special Schools**

The NCSE recommends that the baseline level of 0.25 and 0.5 SNA posts (to be renamed inclusion support assistant posts under the new model) that currently applies to some special schools should be increased to a baseline level of 1. This will ensure that special schools have a baseline allocation of one inclusion support assistant allocated for every class, with the exception of special schools for students with specific learning disability.

Classes with a current baseline allocation of two inclusion support assistants should retain that allocation.

### **Special Classes**

The baseline level of 0.25 and 0.5 SNA posts (to be renamed inclusion support assistant posts under the new model) that currently applies to some special classes should be raised to 1 for the following categories of special classes in mainstream schools:

Classes with a current baseline allocation of two inclusion support assistants should retain that allocation.

## **SNA Perspectives**

With regard to the base line calculation, clarification should be sought on the rationale, how it was to be measured and applied and what impact either negative or positive this would have on posts.

Additionally attendees wondered whether the intent was to apply a similar calculation to mainstream schools and felt that some of the language used around allocating SNAs to special schools was vague, particularly around the wording of “with the exception of special schools for students with specific learning disability”. There were repeated concerns nationally that ASD (Autism spectrum disorder) is not mentioned anywhere within the review, not even within the section on allocations to special classes.

Some concerns related to resource teachers as in some cases it was felt that the recommendation suggested that this group might take over the role of the SNA within some locations (ref: team teaching).

There are concerns surrounding the list of categories outlining various conditions or medical needs, which excluded some conditions. It was queried as to why the list was tabled in the first instance given that this recommendation specifically relates to Special Schools.

## **Fórsa Position**

Clarity is needed on the position regarding ASD units and why they are not mentioned anywhere within the review.

Clarity is also needed to understand the planned delineation between the roles of Resource Teacher and SNA.

It needs to be ensured that the baselines referred to (i.e., 1 or 2 allocated to a class) equate to one or two people. Circumstances where, for example, an allocated post is made up of fractions of other SNA posts should not be allowed to continue.

## **Recommendation 6: Ring-Fenced Funding for Therapy Services**

The NCSE recommends that adequate ring-fenced funding is made available for:

- The NCSE to deliver an in-school therapy service on a tiered basis in line with the findings of the In-school Therapy Service Demonstration Project due to commence shortly in a number of mainstream primary, post-primary and special schools.
- The HSE/service provider to deliver a specified level of multidisciplinary support to school-aged children who require clinical support (i.e. speech and language therapy, occupational therapy, behavioural therapy, psychology, physiotherapy, psychiatry, nursing), taking into account the findings of the In-school Therapy Service Demonstration Project and the report of the working group on complex medical needs.

- HSE funding provision should build in additional numbers of therapy staff on the basis that there may be periods of extended leave required such as maternity, long-term sick leave. HSE support levels should be specified in terms of therapy posts and not in terms of hours.
- A child-centred approach should be adopted, at all levels of service, in relation to the delivery of therapy supports with explicit communication and alignment between home, school and clinical services.

### **SNA Perspectives:**

Broadly speaking, potential funding was seen as a positive but concerns were raised as to “who would be involved in the process”. Attendees were concerned by the implications this recommendation may have on SNA’s Terms and conditions of employment and numbers. Widely, it was communicated that SNA’s were excluded from the majority of programmes and projects and it was felt that should this be rolled out, it must be done in a manner that does not exclude them.

There are concerns over whose role it may be to communicate the information, as outlined in the final bullet point, between the home, services, and the school.

Members pointed out that there are currently GDPR restrictions which prevent certain communications between services and the school and this may be an issue.

Members outlined concerns around the development of their role and its links to delivering therapy programmes which this recommendation may suggest. Should they agree to same they felt that accredited training should be supplied to SNAs. Additionally it was felt that teachers should also be trained as part of this initiative.

### **Fórsa Position**

A clearly-understood delineation of responsibilities is needed to understand the SNA role in relation to the other professions involved.

Clarity is also needed in relation to additional duties and changed reporting responsibilities that this recommendation may bring. A clear training plan will be needed for SNAs involved in additional related duties.

There will need to be consideration as to how the recommended revisions and professionalisation of the SNA role will affect SNA remuneration.

## **Recommendation 7: Complex Medical and Behavioural Needs**

The NCSE now recommends that, as a matter of urgency:

- The Departments of Health and Education and Skills arrange for ring-fenced funding to be available to implement the recommendations of the Cross Sectoral Working Group on Complex Medical Needs.
- Teachers and inclusion support assistants are provided with appropriate training in the management of challenging behaviours and behaviour practitioners are available (as part of the NCSE regional support service) to provide advice and guidance to schools.
- The DES arranges for the immediate preparation and publication of guidance for schools on the management of intimate care, administration of medication, carrying out of complex medical interventions, and the management of extreme challenging behaviours and restrictive practices.

### **SNA Perspectives:**

Members are seeking clarity on what supports and protections are to be given to SNAs dealing with and addressing complex medical & behavioural needs. Once again accredited trainings and supports should be delivered to SNAs in a timely manner and again should this happen what compensations were to be provided to SNAs were they to avail of this training. Moreover the recommendation references “guidance” to be provided by the department however many attendees felt that the department should at the very least have some oversight as to whom delivered the trainings or they themselves should provide same.

The following elements were broadly welcomed – additional funding, additional nursing resources and additional training. It was felt that appropriate policies were to be developed to define what “complex medical needs” are as well as “challenging behaviour”. Members stated that they want specific protections and guidelines/protocols for safety of SNAs to be included in discussions and any policy development for behavioural needs. This includes ensuring that SNAs have the same protections as teachers have in schools and follow-up care by management after an incident occurs within their workplace.

### **Fórsa Position**

A robust, supported and accredited training system will be needed in situations where SNAs are tasked with taking on additional duties.

It is important to ensure that SNAs are not asked to take on duties that clearly and demonstrably belong to other professions.

The development of clear protocols on what is meant by ‘Complex Medical Needs’ and ‘challenging behaviour’ is appropriate. However, such a protocol must be developed inside forums that allow for any disagreements to be resolved before publication.

SNAs want to be represented at any forum that deliberates on potential SNA tasks and duties.

Employers must ensure that included in any policy involving challenging behaviour, is a robust support system to make sure that any SNA injured or assaulted, both physically and/or psychologically, will be properly supported.

Although not included in the original recommendation the Government has announced the creation of a new national nursing service for children with complex medical needs in schools. More detail will be needed to understand the role of the service and the envisaged working relationship between the service and SNAs.

### **Recommendation 8: Oversight, Monitoring and Evaluation**

The NCSE recommends that:

- The DES sets out its policy in relation to how the new scheme is to be put into operation, including its policy on oversight, monitoring and evaluation. This should include provision for the ongoing monitoring of the methodology underpinning the frontloading of supports.
- To assist in providing oversight of the model and following consultation with management bodies and other relevant stakeholders, schools should be required to provide annual reports to the NCSE on progress made and outcomes achieved through students' support plans.

### **SNA Perspectives**

SNA members repeatedly stated that they wished for clarification on whom the "stakeholders" referred to in the report actually were as there had been no consultation with SNAs during the course of the review process.

In fact it was repeatedly stated that although a standardised approach to oversight, monitoring & evaluation was to be welcomed, their lack of inclusion heretofore was a clear indication to them of how undervalued SNAs actually were.

In theory they welcomed that such measures were in the child's interests but they felt that they had much to contribute to such a process and therefore were seeking inclusion.

In addition clarification was to be sought on who conducts the evaluation and whom precisely is to be monitored and evaluated and what if any were the impacts on their role.

### **Fórsa Position**

SNAs insist on being represented in the oversight, monitoring and evaluation of their role, including the review of the methodology underpinning the frontloading of supports. This clearly has industrial relations implications and, therefore, the appropriate resolution mechanisms will need to be in place beforehand.

Clarification is needed on the meaning of the word 'stakeholder' in the context of this recommendation.

## **Recommendation 9: Guidance**

The NCSE recommends that the DES (Inspectorate and NEPS) and the NCSE provide guidance for schools, parents and other stakeholders in advance of implementation. Guidance for schools should have a particular focus on the identification of students' additional care needs and on the use and deployment of resources to meet those identified needs.

### **SNA Perspectives**

Once again the issue of whom the stakeholders were as referred to in this and in previous recommendations. There were some questions as to how the guidelines would be constructed (whom might input into this process) and as to how this was to be applied. Further clarification was sought in relation to use of the term "deployment of resources" and specifically what impact this might have on SNAs currently. Also the potential impact on students and the allocation of an SNA to them given the frontloading proposal. Overall it is fair to state that attendees felt that until further information was available no support of the recommendation could be issued.

### **Fórsa Position**

SNA representatives should be part of the drafting process of any such guidelines and that such guidelines are discussed, prior to publication, in a forum competent to identify and resolve potential industrial relations issues.

It is further noted that this recommendation requires clarity on the other recommendations in the review before it commences.

## **Recommendation 10: Appeals Process**

The NCSE recommends that as part of the implementation phase, the DES consults parents, schools and other stakeholders on the development of appeals processes for parents and schools that are timely, transparent and equitable, up to and including a formal independent appeals process where a local resolution cannot be found.

### **SNA Perspectives**

Members stated that clarity is needed on how the appeals process would function. As was the case in previous recommendations SNAs wished to have clarity on whom the stakeholders were as once again SNA's felt excluded from a process and review that directly referred to them and their profession.

Furthermore concerns were raised on the for this proposed process to impact on SNAs terms and conditions and/or the application of circulars. Attendees in numerous locations requested that the parameters of the appeals process and the function be clearly outlined and communicated.

## **Fórsa Position**

It is important that SNAs are part of the consultation phase suggested in the recommendation.

The parameters of any appeals process would need to be clearly understood before agreement could be reached on them.

More information is needed concerning the proposed appeal process. There should be an automatic right to appeal for the SNA themselves should a recommendation impinge on their employment.

## **Recommendation 11: National Training Programme and Ongoing Focused Training**

The NCSE recommends that:

It is funded to oversee the design, development and delivery of a national training programme tailored to the needs of school communities. The school community includes members of the board of management, students, parents, principal, classroom and special education teachers, inclusion support assistants and ancillary staff.

This programme is designed to ensure that schools have the professional capacity necessary to meet students' additional care needs, where possible and appropriate, including those arising from significant medical, physical, emotional/behavioural, sensory/ communication and other significant difficulties engaging in learning.

### **SNA Perspectives:**

There was repeated queries raised as to the legitimacy and appropriateness of the NCSE overseeing the design and development of training programmes and that this needed to be quantified and clarified.

Should indeed training be provided in "additional care needs etc." SNA's wanted assurances around safeguarding for them should an incident occur. It was the expressed view that SNA's should be consulted on the design and content of the training.

Also should training become available SNAs again raised the matter of accessing accredited training and being compensated for doing same. It was also noted that in this recommendation that Inclusion Support Assistants weren't referenced but merely SNA's.

The funding model was also raised in the context of how was this recommendation to be funded.

Recommendation 11 also recommended that this new training programme should, as a minimum, be accredited NFQ Level 5. SNAs were willing to engage on this debate with many feeling that Level 5 was too low and that as a minimum a level 6 programme should be offered.

## **Fórsa Position**

Any training developed to meet 'additional care needs' should include safeguards and assurances for SNAs. It must also be accredited and attract proper support by way of appropriate time off, travel and subsistence payments where necessary.

A forum at which SNAs can be part of the training planning and design process will be necessary.

Clarity is also needed in relation to the funding source for such training.

Fórsa believes that as part of the professionalisation of the SNA role, a pathway to the eventual introduction of the appropriate professional level of qualification is required.

Engagement is needed to ensure that the value of the experience of existing SNAs is recognised as a qualification in its own right while, on the other hand, a pathway to introduce a level 6 qualification in the short to medium term and a level 7 qualification in the medium to long term should be agreed.

## **Recommendation 12: Implementation Plan**

The NCSE recommends that in advance of implementation, arrangements for the following must be in place:

1. Consultation phase
2. Phased introduction
3. Funding

## **SNA Perspectives**

Members expressed a view that clarification was to be sought on what was the "consultation phase". Furthermore a definition was to be sought the term "phased introduction" and again the issue of how this initiative was to be funded was universally raised.

Unilaterally it was the expressed view that there should be no roll out of any pilot or the review before consultation with the Union, its' Branches & Members took place.

## **Fórsa Position**

A full and robust consultation phase is a necessity. It is also a requirement under the Public Service Stability Agreement.

A standing industrial relations forum should be established at which consultations can take place both now and post-implementation to ensure that issues can be addressed easily. A clear dispute resolution mechanism to assist the consultation process should be agreed before the consultation process begins.

### **Recommendation 13: SNA Terms and Conditions**

In order to bring about greater clarity in the system, the NCSE recommends that the DES again explains its rationale for the need for flexibility regarding the length of the SNA working day/ week and again outlines the duties that can be undertaken during the 72 hours.

#### **SNA Perspectives:**

Members were, broadly speaking, concerned with the NCSE inserting themselves into issues that were central to negotiation between the DES and Fórsa and were questioning the rationale behind this recommendation. Concerns were also raised that such attempts would only serve to have a negative impact on existing T's & C's.

In contrast some groups felt that this recommendation may pose an opportunity for the Union and the DES to gain greater clarity on the ongoing issues around the 72 hours and that possibly this should be explored within strict parameters.

Overwhelmingly it was viewed with scepticism and concern as to why were the NCSE referencing what could be considered industrial relations matters.

#### **Fórsa Perspective**

Fórsa does not believe it appropriate for the NCSE to be involved in matters that affect the terms and conditions of employment of SNAs.

Any official engagement that Fórsa has in relation to the 72 hours matter will be directly with the Department of Education.

There is, however, an opportunity to hold discussions with the Department around the parameters in which a discussion could take place.

We note that a response to this recommendation was not included in the Government's response to the NCSE recommendations. Fórsa, however, remains committed to their abolition.

## Summary

Changes to the existing SNA Scheme should not be made in a piecemeal fashion. The NCSE Review contains comprehensive recommendations which would effectively abolish the job of a Special Needs Assistant. It may be tempting for policy makers to seek to implement these recommendation piece by piece so as to avoid the clear consequences of significant changes to the role.

Fórsa is determined to protect the interests of SNAs and we will ensure that if an enhanced role is required; our members receive appropriate recognition. The changes suggested by the NCSE do not fall within the scope of the current SNA role, any attempt to impose changes or introduce expanded roles in a piecemeal fashion will fail to deliver the enhanced service that students need and will fail to gain the trust and co-operation of staff within the schools sector.

Our research highlights the significant lack of trust amongst the body of SNAs who fear that they will be subject to change without consultation. This trust has to be regained by the Department of Education and Skills and also by local employers. The only way this can be achieved is through adopting an agenda of respect, dialogue and fairness towards existing SNAs.

Fórsa is ready to assist with this process. We are aware that there will be many difficult issues associated with such a significant change and we will play our part in ensuring that the transition to a new Inclusion Support role is as seamless as possible. We now ask all other stakeholders to respect the valuable work undertaken by our SNA members and to work with us to deliver these changes for the benefit of students, schools and the thousands of SNAs with queries and concerns over their future roles within our school system.

If the Government is to succeed in improving educational outcomes for vulnerable students by implementing a new Schools Inclusion Model it will only do so by listening to and engaging with Special Needs Assistants.

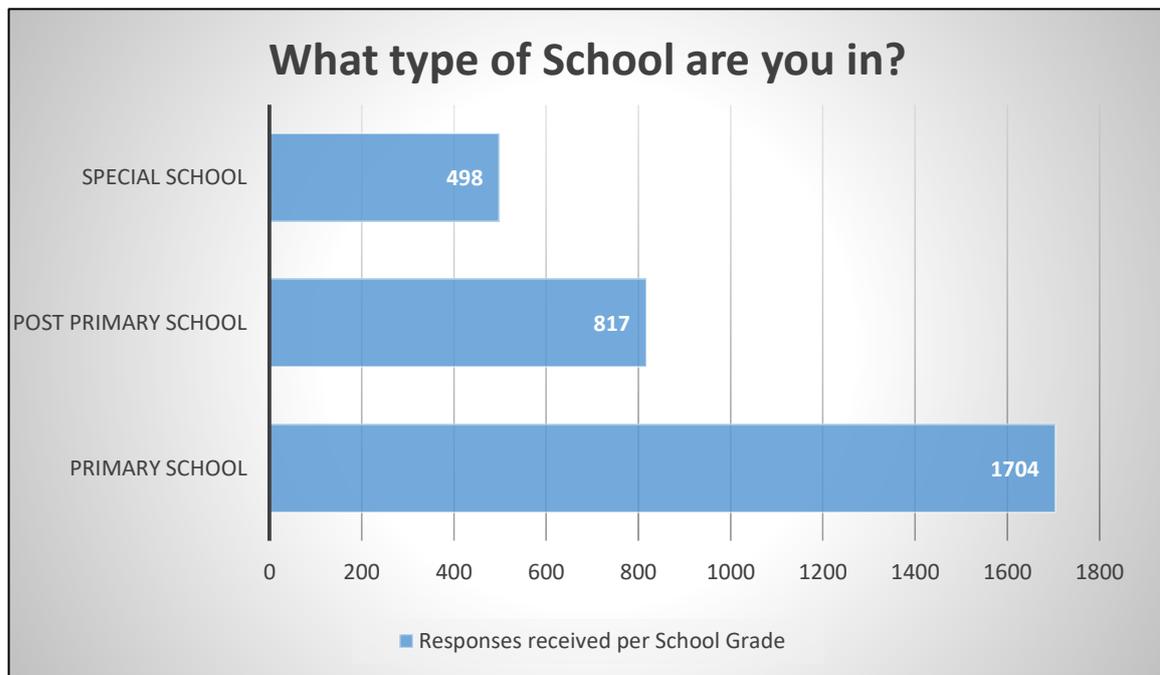
## Appendix 1

### ONLINE SURVEY

As previously mentioned this online survey was conducted by way of follow up to the roadshows and whilst raising the NCSE Recommendations it also served to gather other data (as detailed below). In total respondents were invited to answer 22 questions and in some cases not all respondents answered all 22 questions. Overall, the total number of responses received was 3019 (nationally).

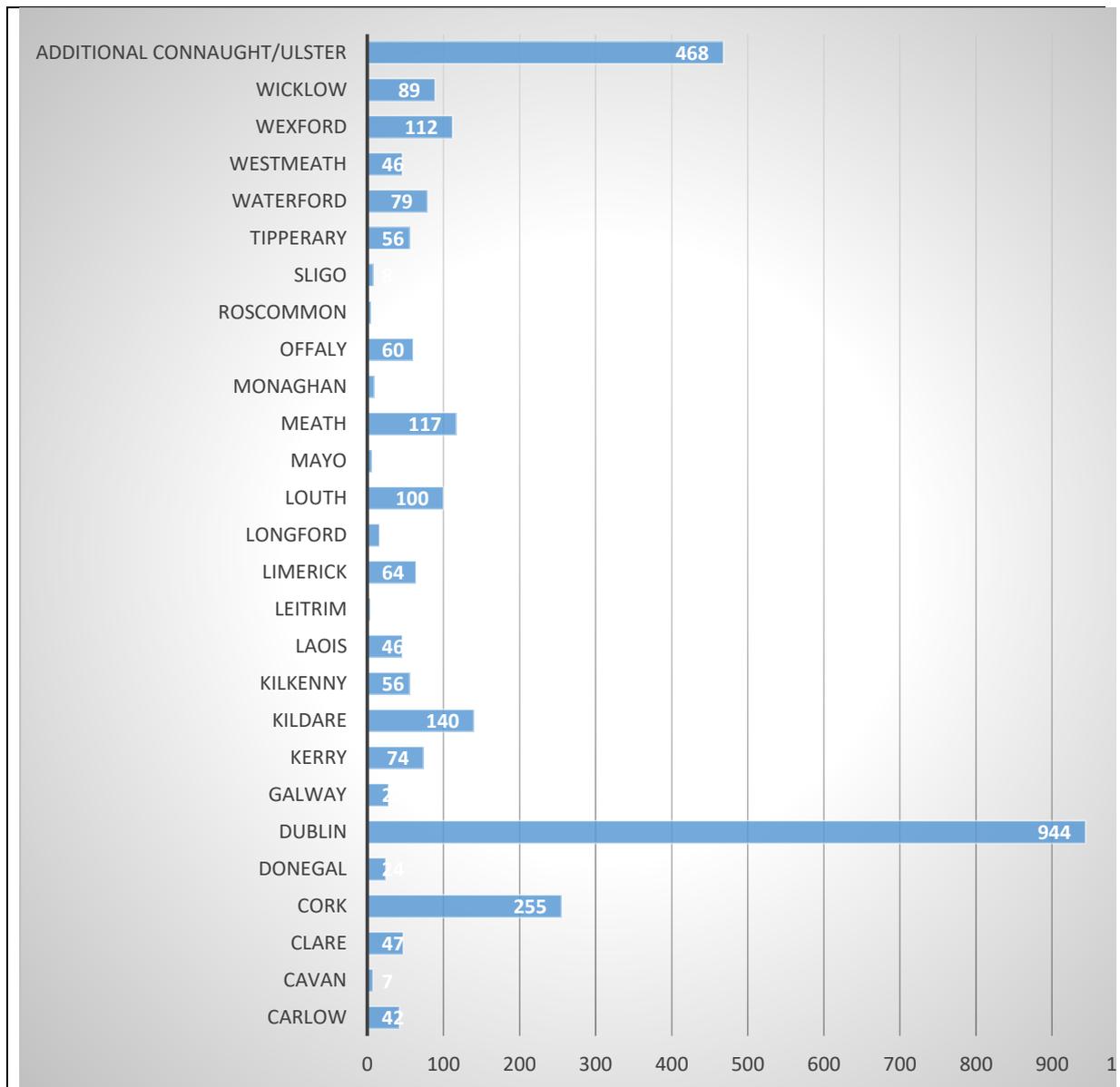
Detailed below are some of the Q&A's that are relevant to the content of this report. This survey was separate to the survey conducted of the 1000 members who attended the roadshow meetings on this matter.

The next series of charts relates to specific profile building of the membership that engaged and their responses. It was an anonymous survey.



<b>ANSWER CHOICES</b>	<b>RESPONSES</b>	<b>TOTAL %</b>
<i>Special Schools</i>	<i>498</i>	<i>16.5%</i>
<i>Post Primary Schools</i>	<i>817</i>	<i>27.5%</i>
<i>Special Schools</i>	<i>1704</i>	<i>56%</i>
<i>Total</i>	<i>3019</i>	

## RESPONSE LEVEL PER COUNTY



## RESPONSE LEVEL PER COUNTY

<i>COUNTY</i>	<i>RESPONSE LEVEL</i>	<i>RESPONSE %</i>
<i>Additional Connaught/Ulster</i>	<i>468</i>	<i>16.1%</i>
<i>Wicklow</i>	<i>89</i>	<i>3.0%</i>
<i>Wexford</i>	<i>112</i>	<i>3.8%</i>
<i>Westmeath</i>	<i>46</i>	<i>1.5%</i>
<i>Waterford</i>	<i>79</i>	<i>2.7%</i>
<i>Tipperary</i>	<i>56</i>	<i>1.9%</i>
<i>Sligo</i>	<i>8</i>	<i>0.2%</i>
<i>Roscommon</i>	<i>5</i>	<i>0.1%</i>
<i>Offaly</i>	<i>60</i>	<i>2.0%</i>
<i>Monaghan</i>	<i>9</i>	<i>0.3%</i>
<i>Meath</i>	<i>117</i>	<i>4.0%</i>
<i>Mayo</i>	<i>6</i>	<i>0.2%</i>
<i>Louth</i>	<i>100</i>	<i>3.4%</i>
<i>Longford</i>	<i>16</i>	<i>0.5%</i>
<i>Limerick</i>	<i>64</i>	<i>2.2%</i>
<i>Leitrim</i>	<i>4</i>	<i>0.13%</i>
<i>Laois</i>	<i>46</i>	<i>1.5%</i>
<i>Kilkenny</i>	<i>56</i>	<i>1.9%</i>
<i>Kildare</i>	<i>140</i>	<i>4.8%</i>
<i>Kerry</i>	<i>74</i>	<i>2.5%</i>
<i>Galway</i>	<i>28</i>	<i>0.9%</i>
<i>Dublin</i>	<i>944</i>	<i>32.5%</i>
<i>Donegal</i>	<i>24</i>	<i>0.8%</i>
<i>Cork</i>	<i>255</i>	<i>8.7%</i>
<i>Clare</i>	<i>47</i>	<i>1.6%</i>
<i>Cavan</i>	<i>7</i>	<i>0.2%</i>
<i>Carlow</i>	<i>43</i>	<i>1.4%</i>
<i>Total number of responses</i>	<i>2903</i>	

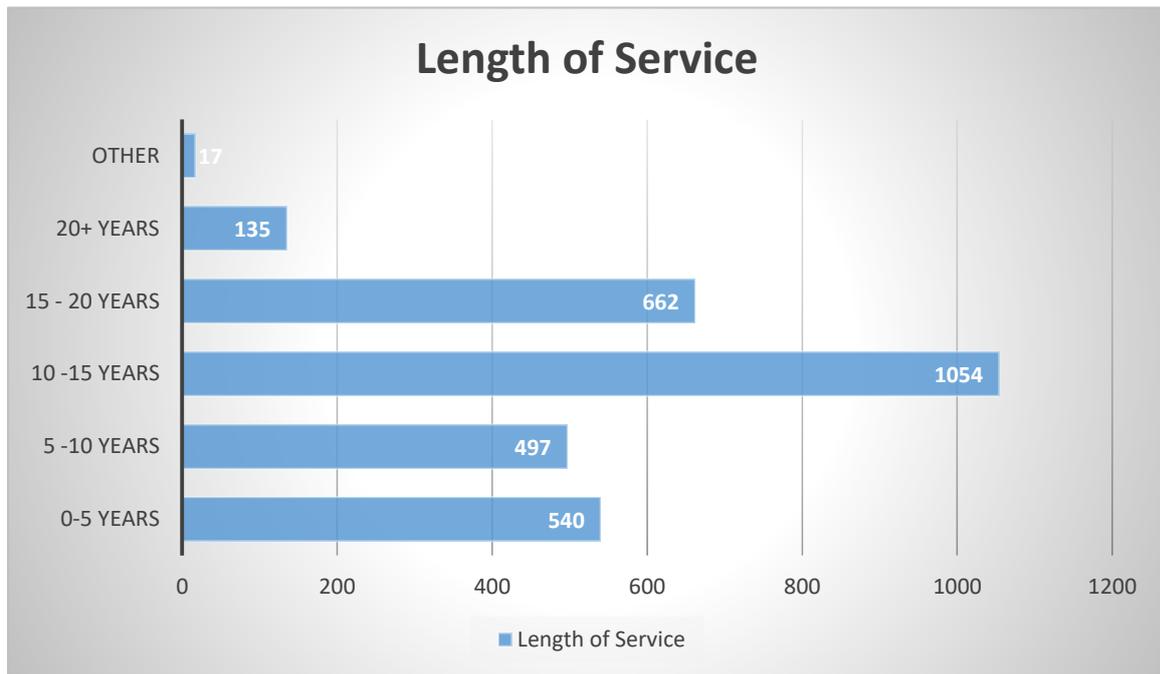
**RESPONSE RATE PER REGIONAL STRUCTURE**



**HOW MANY HOURS DO YOU WORK (continued).**

<i>Hours Worked by respondents</i>	<i>Number of respondents</i>	<i>%</i>
<i>Full Time hours</i>	<i>2388</i>	<i>84%</i>
<i>Infant Day</i>	<i>222</i>	<i>8%</i>
<i>0.75 time</i>	<i>67</i>	<i>2%</i>
<i>0.5 time</i>	<i>121</i>	<i>4%</i>
<i>Other</i>	<i>58</i>	<i>2%</i>
<i>Totals</i>	<i>2856</i>	

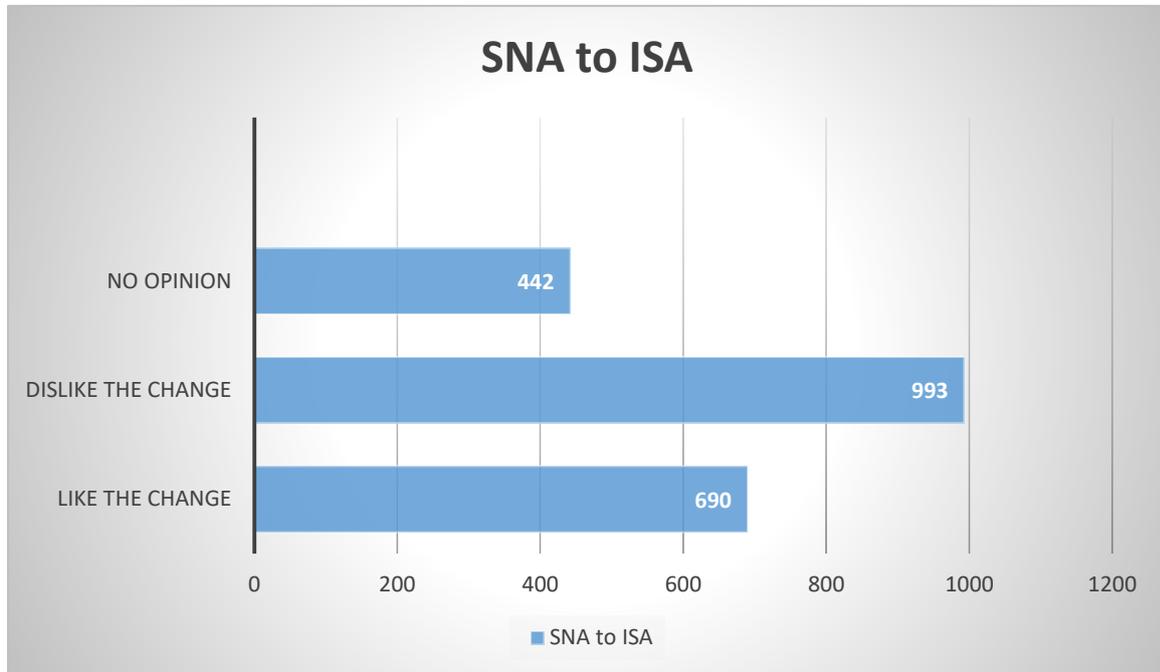
**HOW LONG HAVE YOU BEEN AN SNA?**



**HOW LONG HAVE YOU BEEN AN SNA (continued)**

<i>Length of Service</i>	<i>No. of respondents</i>	<i>%</i>
<i>0 - 5 years</i>	<i>540</i>	<i>18.5%</i>
<i>5 - 10 years</i>	<i>497</i>	<i>17%</i>
<i>10 - 15 years</i>	<i>1054</i>	<i>36%</i>
<i>15 - 20 years</i>	<i>662</i>	<i>23%</i>
<i>20 + years</i>	<i>135</i>	<i>5%</i>
<i>Other</i>	<i>17</i>	<i>0.5%</i>
<i>Total</i>	<i>2905</i>	

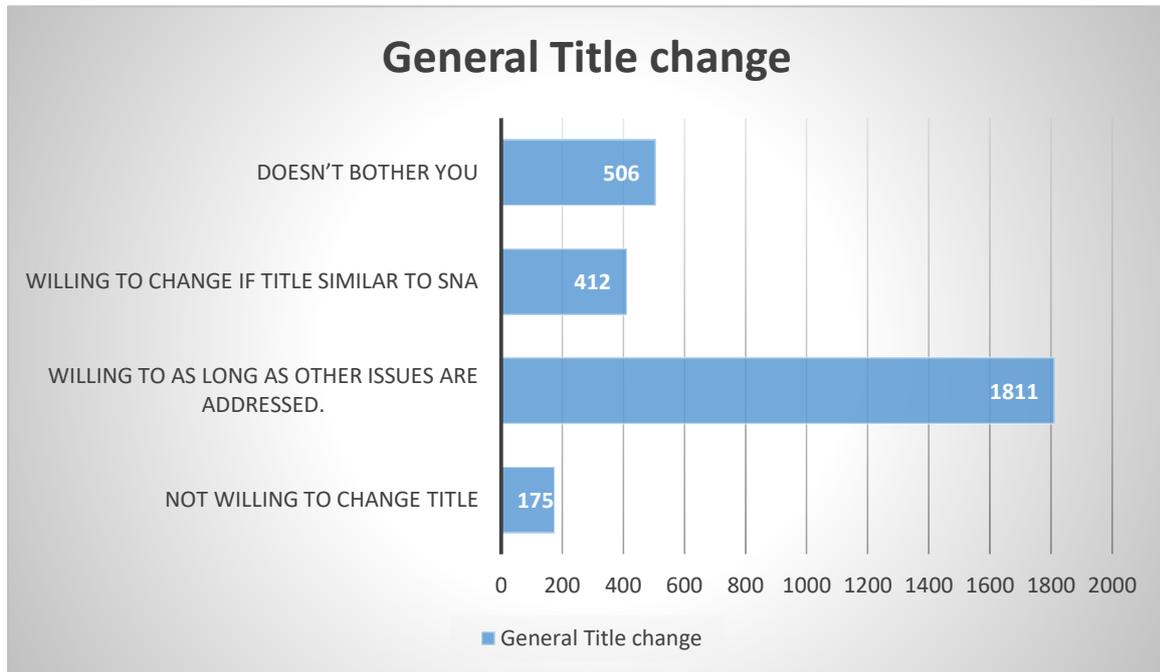
**Name Change: Do you favour the change of title from Special Needs Assistant to Inclusion Support Assistant?**



**NAME CHANGE (continued)**

<i>Options</i>	<i>Respondents results</i>	<i>Results %</i>
<i>Like the proposed title change</i>	<i>690</i>	<i>24%</i>
<i>Dislike the proposed title change</i>	<i>993</i>	<i>34%</i>
<i>No opinion either way.</i>	<i>442</i>	<i>42%</i>
<i>Totals</i>	<i>2894</i>	

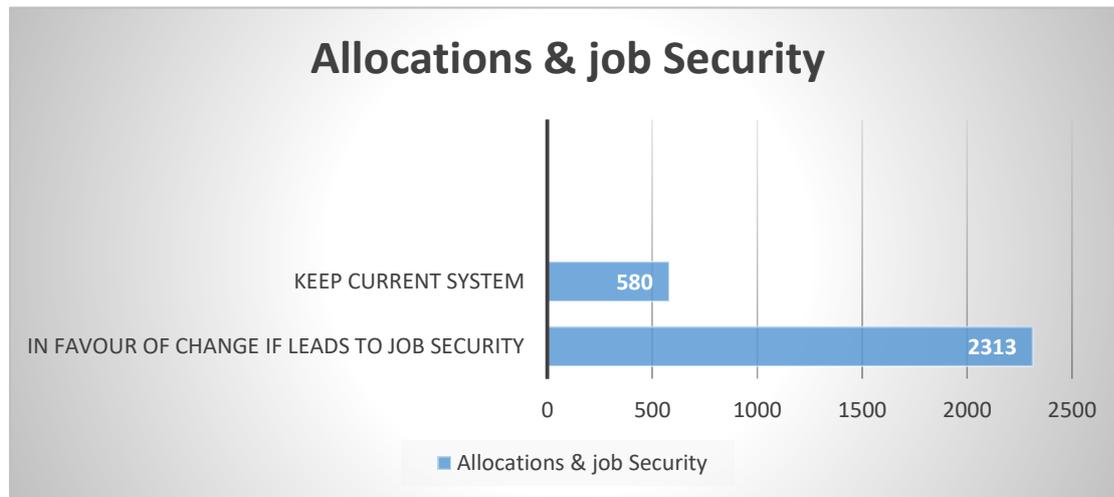
**Name Change (in general)**



**GENERAL NAME CHANGE (continued)**

<i>Change of title</i>	<i>Level of response</i>	<i>Response %</i>
<i>Not willing to change title.</i>	<i>175</i>	<i>6%</i>
<i>Willing to change as long as other issues are addressed</i>	<i>1811</i>	<i>62%</i>
<i>Willing to change of title is like SNA.</i>	<i>412</i>	<i>14%</i>
<i>Des not bother me either way.</i>	<i>506</i>	<i>17%</i>
<i>Total</i>	<i>2904</i>	

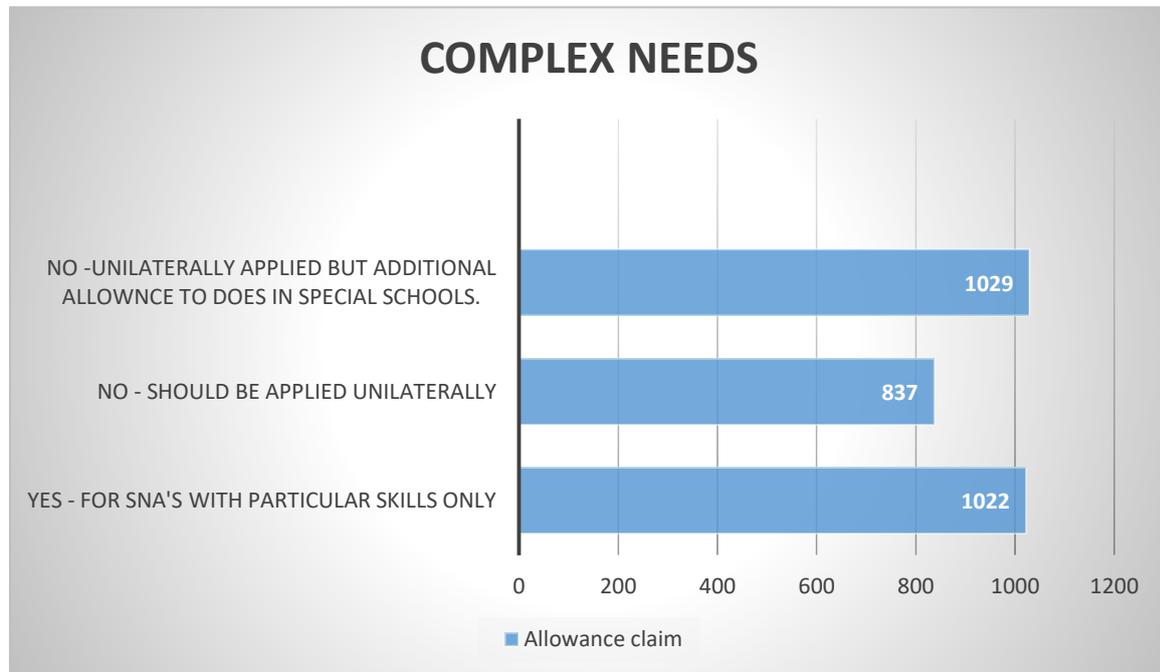
**JOB SECURITY – ALLOCATIONS**



<b><i>Job Security &amp; Allocation</i></b>	<b><i>No. of responses</i></b>	<b><i>Response %</i></b>
<i>In favour if change to current allocation system if leads to job security.</i>	<i>2313</i>	<i>80%</i>
<i>Keep current system if cannot be reformed</i>	<i>580</i>	<i>20%</i>
<b><i>Totals</i></b>	<b><i>2893</i></b>	

## **COMPLEX MEDICAL NEEDS**

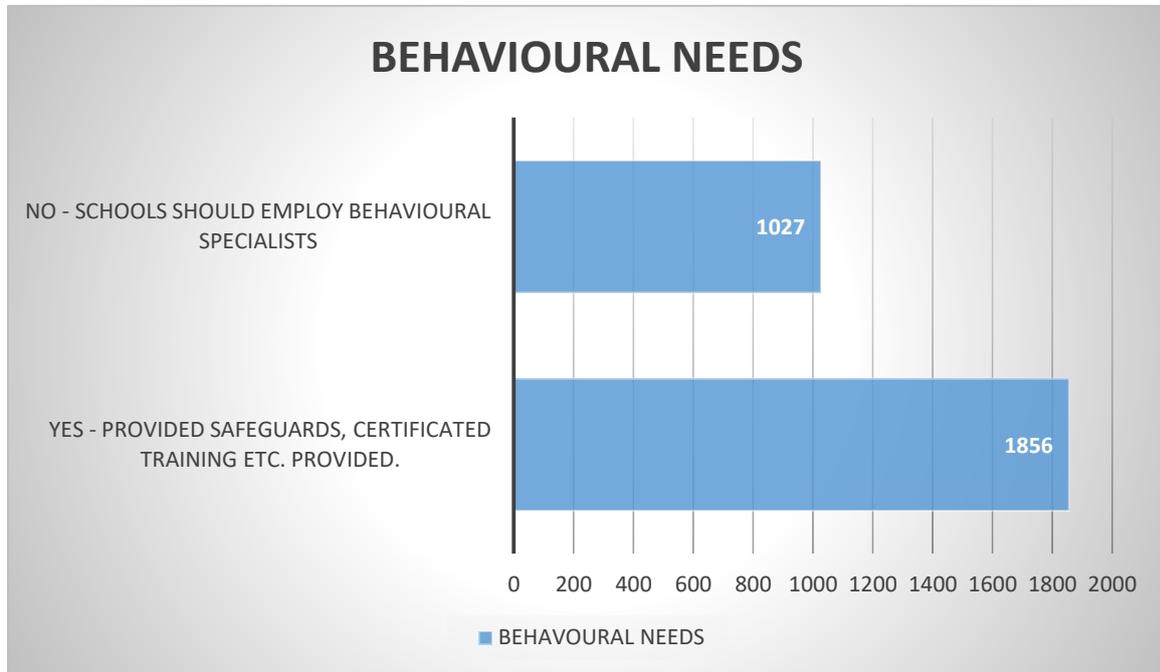
*The context of this question was to establish whether or not members favoured the idea that the Union should seek additional allowances for any new specialisation that an SNA is required to do, subject to training.*



<b><i>Complex Medical Needs</i></b>	<b><i>Level of response</i></b>	<b><i>Response %</i></b>
<i>Yes – for SNA’s with specific skills only.</i>	<i>1022</i>	<i>35%</i>
<i>No – all SNA’s have additional skills – therefore an allowance should be sought and unilaterally applied.</i>	<i>837</i>	<i>29%</i>
<i>No (as above). An additional allowance should also be paid to those in special schools whom have undergone other trainings.</i>	<i>1029</i>	<i>36%</i>
<b><i>Total</i></b>	<b><i>2888</i></b>	

***BEHAVIOURAL NEEDS***

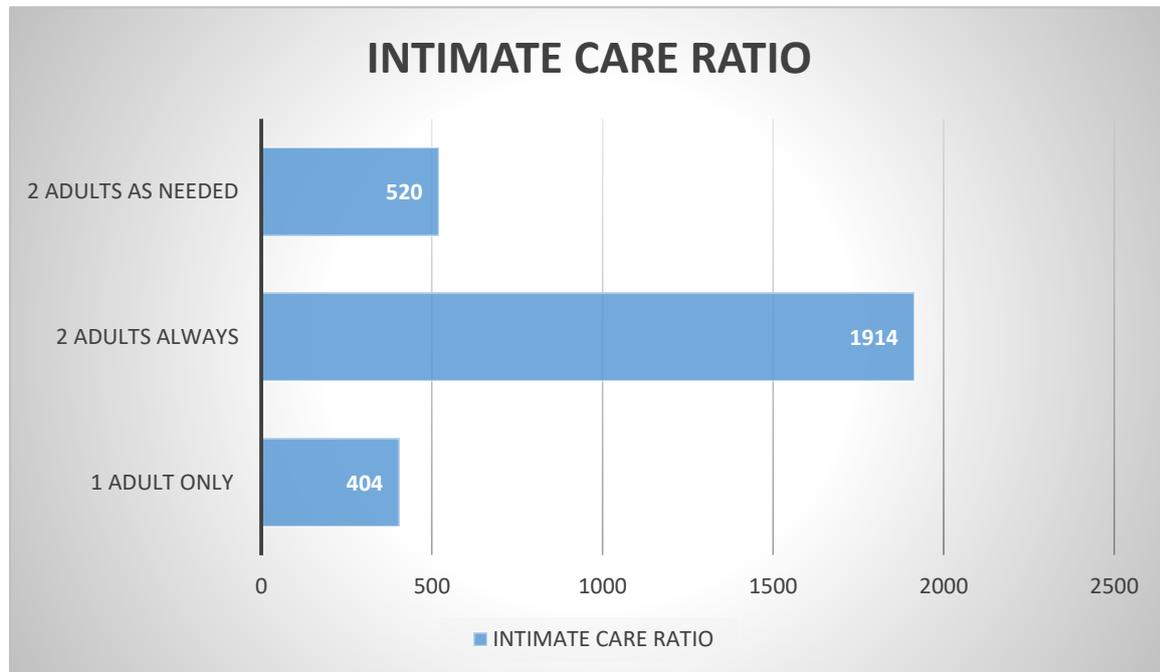
*The context of this question was whether SNA's were willing to take on challenging behaviours, further to appropriate training, certification and safeguards being applied.*



<i>Behavioural Needs</i>	<i>Level of response</i>	<i>Response %</i>
<i>No - Schools should employ behavioural specialists.</i>	<i>837</i>	<i>29%</i>
<i>Yes - provided safeguards, certified training etc. is provided for SNAs.</i>	<i>1022</i>	<i>35%</i>
<i>Total</i>	<i>2888</i>	

**INTIMATE CARE RATIO**

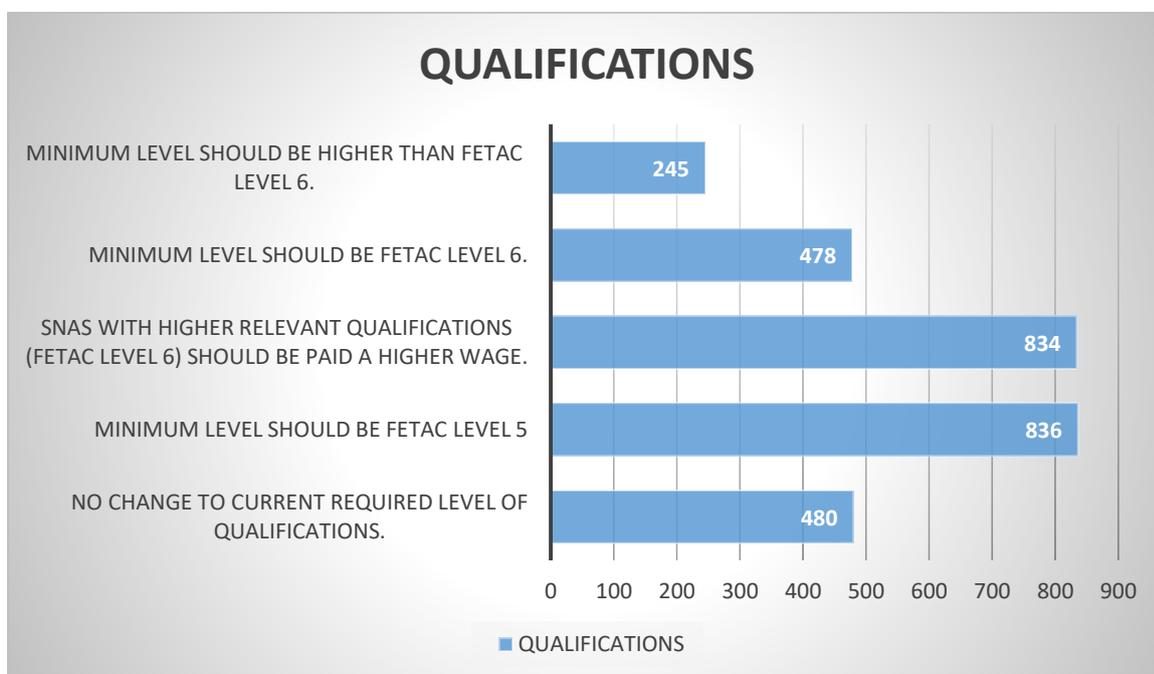
The context of this questions relates to a recommendation in the NCSE Review that suggests that when it comes to toileting needs that single adult supervision is required only.



<i>Intimate Care Needs - Toileting</i>	<i>Level of response</i>	<i>Response %</i>
<i>2 adults as needed.</i>	<i>520</i>	<i>18%</i>
<i>2 adults always</i>	<i>1914</i>	<i>67%</i>
<i>1 adult only</i>	<i>404</i>	<i>14%</i>
<i>Total</i>	<i>2838</i>	

## QUALIFICATIONS

The context of this question was to measure whether or not the current levels of qualification for SNAs were appropriate or should be revisited and reclassified (in light of the recommendation within the NCSE review).



<i>Qualifications</i>	<i>Level of response</i>	<i>Response %</i>
<i>Minimum qualification level should be higher than Fetac Level 6.</i>	245	9%
<i>Minimum yes - provided safeguards, certified training etc. is provided for SNAs.</i>	478	17%
<i>SNAs with higher qualifications (FETAC Level 6) should be paid a higher wage.</i>	834	29%
<i>Minimum level should be Fetac Level 5.</i>	836	29%
<i>No change to current required level of qualification</i>	480	17%
<i>Total</i>	2873	