



**IPPN Submission – Draft DEY Circular on
Irish Sign Language**

Prepared for:

The Department of Education & Youth

September 2025

CONTENTS

1	INTRODUCTION	2
1.1	OPPORTUNITY	2
1.2	CONSULTATION	2
2	KEY POINTS OF FEEDBACK	3
2.1	EQUITY OF ACCESS	3
2.2	ASSESSMENT OF ISL DEPENDENCE.....	4
2.2.1	<i>Primary Mode of Communication/ Preferred Communication.....</i>	<i>4</i>
2.3	ROLE OF THE ISL-SCS	5
2.4	TRAINING AND QUALIFICATIONS.....	5
2.4.1	<i>What qualifications are needed?.....</i>	<i>5</i>
2.4.2	<i>Access to training and qualifications.....</i>	<i>6</i>
2.5	INCLUSION OF PARENTS AND BUS ESCORTS	7
2.6	WELLBEING AND BELONGING	8
2.7	POSITIVE DEVELOPMENT	8
2.8	CLARIFICATIONS REQUIRED	9
3	SNA WORKFORCE DEVELOPMENT PLAN	10

1 INTRODUCTION

1.1 OPPORTUNITY

IPPN is grateful for the opportunity to review the draft ISL circular and to provide feedback to the Department in its deliberations. The work being done to create this new role is very welcome. Generally, the circular is welcome and a step in the right direction towards providing access to the curriculum for Deaf and Hard of Hearing students.

This submission aims to provide feedback from a school leadership and management perspective to strengthen and clarify the proposals. It is hoped that these observations and feedback will help to strengthen the development of an ISL Specialist Classroom Support (ISL-SCS) role.

1.2 CONSULTATION

In seeking to provide useful feedback, IPPN reached out to school leaders of schools for deaf / hard of hearing children and of mainstream schools with special classes for children with hearing issues as well as leaders of special schools, to gather their views on the draft circular and any other points for consideration. They were delighted to be asked.

The schools that contributed drew on the experience of all of the teachers and other staff involved in supporting these children to offer constructive recommendations, based on challenges and successes they have observed over the years.

2 KEY POINTS OF FEEDBACK

2.1 EQUITY OF ACCESS

There is no reference in the circular to mainstream schools with special classes, nor to special schools. While a special class allows for specialist provision within a mainstream setting, it also allows for integration of deaf/hard of hearing students into the mainstream setting. Such schools are inadequately resourced with regards to ISL support for deaf/hard of hearing students integrating into mainstream classrooms.

ISL is a recognised national language, yet current education structures do not adequately support children who are ISL dependent. Provision is heavily focused on mainstream schools, with limited recognition of ISL as a primary language in Deaf schools and special classes, where it is the norm. This creates systemic barriers to inclusion, belonging and identity development for Deaf children.

Special Schools are in great need of ISL Supports, including ISL Classroom Supports. In some special schools, a very large percentage of pupils have issues with hearing, some have cochlear implants. In addition, many of these pupils do not receive any SLT support, therefore have no means of communication.

Transparency is needed with regard to how the 'greatest level of need' is determined. Some children who are deaf/have hearing challenges have other difficulties requiring support.

We recommend that there be zero discrepancy in access to ISL, whether a Deaf child attends mainstream, a special school, or a specialist Deaf school. Their right to language, communication and belonging must be equal. Policy must explicitly acknowledge Deaf schools and special classes as environments where ISL is already valued, supported and central to communication. Similarly, this could apply to a special school where there is a Deaf child enrolled.

2.2 ASSESSMENT OF ISL DEPENDENCE

At present, assessment relies almost exclusively on a medical model (focusing on hearing and speech outcomes) with no recognition of the social or cultural model of language, communication or identity. There is no independent process to assess whether a child is ISL-dependent.

The draft circular states that application for the ISL-SCS support role requires a report ‘*by SLT/Cochlear Implant Programme*’ that ISL is the primary mode of communication. This is very problematic. Many, if not most, SLTs are not trained to support the Deaf, thus how can SLTs realistically assess their needs? Surely an assessment by a qualified audiologist, a member of the BAHA¹ team, a teacher for the deaf, and parental input should be deemed to be just as valid, if not more so. Does this seek to exclude children who are not deemed to be severely or profoundly deaf but who wish to communicate through ISL? There is no reference to deaf families for whom ISL as a primary mode of communication. ISL is, after all, the third official language of the State. The requirement for this report suggests exclusion of Deaf families who are not in favour of medical model e.g. cochlear implant programme and would not be engaged with the Implant Programme.

Further, this approach focuses on the student’s hearing loss and does not acknowledge students whose preferred or primary language is ISL. What happens the student who does not have a Cochlear Implant or who works with a SLT but whose language is ISL? Will they have access to this scheme? Students who wear hearing aids – are they not entitled to this scheme? Clarification on all of these key points about eligibility is crucial.

2.2.1 Primary Mode of Communication/ Preferred Communication

The term “preferred communication” is often criticised for being vague and open to interpretation, as it fails to capture the complexity of how individuals access and express language. A clearer and more inclusive approach is to distinguish between preferred *language* (e.g. English, Irish, Irish Sign Language) and preferred *modality* (e.g. signed, spoken, auditory-oral, Braille, AAC). This distinction acknowledges that communication is not a single choice but may involve multiple languages and modalities, often used flexibly depending on context.

¹ BAHA – Bone-anchored hearing aid

This also reflects international and national obligations, such as the UNCRPD and the Irish Sign Language Act 2017, by ensuring that individuals' linguistic and communicative rights are explicitly recognised and upheld.

95% of Deaf and HH children are born into hearing families who have no knowledge of ISL and therefore their first language is the language that is used in the home. Children who acquire ISL through their education and would benefit from having access to the ISL scheme.

We recommend the introduction of independent ISL advisors to carry out assessments through a social model lens. These advisors would ensure that children's full communication needs are recognised and that decisions are not made solely based on medical perspectives.

It is our understanding that there are no nationally recognised assessments of children's ISL proficiency. If this is the case, there is a need for urgent development of same.

2.3 ROLE OF THE ISL-SCS

The circular states that developing and enhancing ISL competency is a key aim of the role. If this is the case, is the ISL-SCS not a teacher of the language? ISL is a full language, not just a communication tool.

'It is anticipated over time, the role of the special needs assistant with ISL competency will be replaced by the ISL Specialist Classroom Support (ISL-SCS)'. Once this role is replaced by the ISL-SCS, will they take over the additional roles of the SNA (care needs) and then the SNA is not required? Or will the student then potentially have two adults supporting them, with their care needs and their communication needs? Consideration needs to be given to whether having multiple adults around the student may result in a reliance on the supports and isolation, with a potential impact on their independence-building and socialising skills.

2.4 TRAINING AND QUALIFICATIONS

2.4.1 What qualifications are needed?

The level and type of ISL qualification requires clarification, particularly what is meant by ‘relevant qualification’. Does it refer to the TCD Level 8 degree in Deaf Studies, the Teacher of ISL qualification? Is a B.Ed. with competence in ISL relevant? Is a qualification as an interpreter needed?

The circular references QQI prior learning. How is this assessed? We have heard that the Deaf Society does not accept schools’ QQI training. This must be clarified and addressed.

The level of proficiency required in English / Irish (depending on the medium of instruction in the school) should be of a high standard and is essential for the role to allow effective communication throughout the school community. However, a requirement for ‘excellent oral language skills’ would exclude most members of the deaf community who may not have oral language, and for whom English or Irish would be a second language.

Furthermore, how is proficiency in ISL assessed, and by whom? This needs to be clarified when it comes to the child, the teacher, the ISL-SCS and the ISL Advisor. ISL competency is awarded up to level 8. Teachers often have up to level 4. There needs to be an agreed centralised assessment process to ascertain the level attained, and the level required.

A very important point relates to the reference to ‘mediating the curriculum’. The skills needed to convey what can be complex pedagogical concepts are not easily gained. Training colleges urge those who are upskilling in ISL not to undertake ‘interpreting’ work, as this is not part of the training course. Thus, expectations must be tempered in relation to the qualifications and skills of the ISL-SCS in relation to supporting children with curricular learning.

2.4.2 Access to training and qualifications

Several schools commented that they have a wonderful staff who would be only too happy to train in ISL. Access to this training is an issue for many. The payment of SNA/ISL-SCS training needs to be centralised as it is for teachers as this is a significant barrier for most schools.

SNAs currently lack structured pathways to specialise in ISL. While the National Framework of Qualifications Level 8 may represent the ideal standard, in practice it excludes many SNAs who hold Level 6 qualifications, including those with years of experience supporting Deaf children or family

backgrounds in deafness. Others may hold Level 6 or even Level 8 qualifications in early childhood education, which would be a strong foundation for further qualifications in ISL.

The existing Level 8 Deaf Studies course requires 4 years of full-time study in Dublin, which creates serious barriers like the high cost of living in Dublin makes the course financially inaccessible. A single, full-time route excludes those who need part-time, online or distance-learning options. Consideration needs to be given to alternative pathways to access the required qualification for an ISL-SCS.

One option would be to reform training pathways to allow for flexible, modular and distance-learning options. Entry should be possible at Level 6 with progression routes to Levels 7 and 8, so that the experience and expertise of SNAs and others are recognised rather than excluded.

Another option would be to establish a defined ISL Specialist role, separate from SNAs, with a clear remit, financial equity and structured career progression. This role would provide consistency, recognition and professional standards for ISL support in schools.

Regarding the Programme of Professional Learning, does this include the teaching of ISL? What is the nature and format of the professional learning and how can staff avail of it? Is there substitute cover available?

With regard to the point *'Support the development of a whole-school approach to meeting the needs of students who are Deaf or Hard of Hearing and whose primary mode of communication and language is ISL'*, school leaders welcome collaboration among staff working with the student to ensure success in their learning. However, time must be allocated for staff outside of class contact time for this preparation work to take place. As mentioned above, teachers require training in ISL to empower them to support their Deaf/HH pupils. To reiterate the point, ISL is not a communication tool, but an official language.

2.5 INCLUSION OF PARENTS AND BUS ESCORTS

Parents and bus escorts, who are central to children's daily support, are not currently included in ISL training initiatives. Their involvement is essential to strengthen children's communication and inclusion. This could be achieved by extending funded ISL CPD and training opportunities to parents

and escorts, ensuring that all adults who regularly support children can contribute to their language and social development.

2.6 WELLBEING AND BELONGING

The inclusion of the aim to support children to make progress ‘in line with their ability’ is most welcome as this acknowledges that there is an imperative to support the child to reach their full potential in all aspects according to their individual capacities.

Children without ISL-proficient peers or staff at all times during the school day risk social isolation, loss of identity and poor mental health. Academic access alone does not ensure belonging. While adult advocacy and support (interpreters, teachers, SNAs) is vital, this cannot replace peer friendships with children of a similar age.

To progress this, explicit acknowledgement in policy of the importance of social belonging and identity and participation in full in all aspects of school life, not just curriculum access, is important. This requires ISL support to be available during all elements of the school day – including yard time and other breaks - not just during class-contact time.

Children need structured opportunities to develop friendships through shared language. Mainstream schools could learn from the established practice of Deaf schools and special classes, where ISL creates a strong foundation of community and belonging.

2.7 POSITIVE DEVELOPMENT

The development of the ISL-SCS is very welcome and long overdue. It has the potential to be a ‘game changer’ for many children who feel excluded to a greater or a lesser extent from various aspects of school and home life.

The inclusion of supports for transitions into and out of primary school is excellent and badly needed.

It is very positive to see statements about supporting children to progress in line with their ability.

Schools should be encouraged to apply for and avail of this support as it could also be a game changer for the whole school community in facilitating true inclusion.

2.8 CLARIFICATIONS REQUIRED

Further clarification is required in the circular regarding

1. the inclusion of all school types in the provision of ISL supports
2. what constitutes the primary mode of communication
3. criteria to access the support of an ISL-SCS
4. the input of the ISL SCS into a Student Support File e.g. communication and other targets
5. ISL-SCS/student ratio - the need for 1:1 support as no two children will have the same level of ISL competency, understanding and expression and will need different types of support
6. what an assessment report needs to state as evidence that an ISL-SCS is needed
7. the level at which the ISL Advisor role will operate – one per school, access to an Advisor, if so on what basis? Does it overlap with or replace the Visiting Teacher for the Deaf role?
8. what is meant by ‘good educational outcomes’ – should reference be made to the new PCF?
9. how SNA redeployment will work in the context of the introduction of this new role and existing SNA supports – who manages this and what are the guidelines?
10. Whether the SCS role is deemed to be a teaching role. Will they teach ISL to the children? This would be welcome.
11. roles of NCSE and school management regarding management of this role, and adherence to school policy and procedures. The draft circular states that the ISL-SCS is an employee of the NCSE. To hire effectively, NCSE requires detailed profile of the school community, or involve school management in the role specification.

3 SNA WORKFORCE DEVELOPMENT PLAN

IPPN has been involved in the SNA Workforce Development Planning project and is aware of the significant work being done on the role of the SNA and the development of a comprehensive programme of professional learning for SNAs. It is important to ensure that the definition and implementation of the ISL-SCS role is integrated with that work, to ensure that unnecessary duplication and complexity is not introduced into schools.