IPPN Submission on DEY Draft Policy Template and supporting information for schools on Managing Behaviours of Concern in Crisis Situations

This is a very good template that schools will find useful. There are, however, some suggestions for improvement.

Key Recommendations

1. Share the next draft following consultation with all stakeholders, and with relevant Resource Documentation included, before it goes out to any school.

2. We highlight in particular our concerns regarding professional development. See Section 6 below, which cover concerns around:

    a. The costs of providing professional development for all staff are prohibitive for most schools. Encouraging Boards of Management to provide same is neither a cohesive nor a workable plan for most schools.
    b. A train-the-trainer model is not workable. Many leaders have insufficient time outside the classroom to undertake this work. Where is the time to develop and deliver such training within schools?
    c. The lack of capacity of the NCSE to address the demand for training in this area is also to be noted.

3. The conducive conditions for leadership of special education, especially around capacity and time, are key to the successful prevention and management of crisis situations. Our post primary colleagues this year received "co-ordination hours to support schools with planning and coordination of the Special Education Teaching supports" (Circular 13/2026) where:
    a. *'the principal can allow time for the core team to identify, plan, review, monitor and coordinate provision for young people with special educational needs. This time should be used appropriately to ensure that there is minimal impact on the provision of targeted and high-quality special education teaching support for young people with special educational needs who have been identified on the School Provision Plan for Young People with Special Educational Needs'*

    This time is in addition to the school's SET allocation. A similar model for primary schools would facilitate the collaboration and consultation that is contained within the draft policy as well as the providing the time and space to create support plans and risk assessments.

Sections

- p. 1 refers to "*Other key national documents to consult include the Tusla Code of Behaviour, National Counsel for Special Education (NCSE) Relate and The Autism Good Practice Guidance for Schools Supporting Children and Young People which provide valuable support in creating a policy that will promote positive behaviour, ensure consistency, and strengthen schools' capacity to respond effectively to behaviours of concern in a way that is safe, inclusive, and respectful*". None of these are requirements at the moment.
- It is positive that all expected areas are covered, including the collaboration with families and student voice, showing that all voices will be included.
- It is excellent to see prompts to assist schools in their appropriate wording and the use of language. Reference could be made to the National Disability Authority paper on Disability Language and Terminology, to provide practical guidance on respectful, inclusive, and consistent language when writing and speaking about disability and inclusion.

Section 1: Policy Statement and Purpose

- It is really important that **whole-school approaches** are taken to this whole area. Mainstream schools with special classes will be well aware that this does not just apply to the special classes because integration is an integral part of how mainstream schools work.
- In order to be successful, we need to ensure that it applies to all, staff, students, parents and guardians in partnership because it is vital for all to be involved, for all to be aware and to assist in the creation of a better awareness resulting in misunderstandings being kept to a minimum.

Section 2: Legal Context

- It is very good to see this area covered as we get many calls asking if school staff behave a certain way, are they staying within the law, so to see it clearly set out as Duty of Care, Child Safeguarding under the Children First Guidelines, and Health and Safety under the Health and Safety at Work act of 2005 brings great clarity to this area.
- Reference could be made to the resources available in this area through the Health and Safety Authority and IPPN among others.
- Should Code of Behaviour or other mandatory policies (such as Dignity at Work) be mentioned?

Section 3: School Ethos

- It is good to see that the core values and principles of the school ethos are addressed here because it is important that a whole staff has a discussion, not just in this area but in all other areas in terms of their beliefs, what we believe around here and how we behave in terms of those beliefs.

- It is also good to see a commitment to well-being and to see that schools will be clearer on their approaches to this area.
- When a whole-school approach is taken and where all understand that this policy is not just for particular students, inclusion and equity will form part of all school policies where the response to behaviours of concern should be fair and sensitive to the diverse needs of the student profile, and especially those with a disability or additional educational need.
- It would be helpful if the revised Codes of Behaviour documentation was actually published as soon as possible, as many schools are still operating Codes of Behaviour under the Education Welfare document of 2014.
- It is important that we see adaptations for children with additional educational needs as far too often suspension and expulsion is used based on the current code, and this does not always serve the needs of the pupils involved.
- Collaboration with the pupils and their families and indeed the outside professionals is necessary for this area to be successful in our schools.
- Some reference here could be made to the Education Therapy Service (ETS) that is now in many special schools and will be rolled out to all schools in time.
- A reference could be made to the Working Together document in relation to how we work together as educators and therapists in our schools.
- 'Collaboration with the families' - needs clarification by the school as to how and when this might happen, but it does need to be meaningful, but again it is good to see the prompts here that assist the school in the type of response they might make.
- In order to reflect a belief that "parental Involvement is central to creating effective, inclusive and supportive learning environments", it would be desirable that the school explicitly states how this will be done so that expectations are clear on all sides.

Section 4: Collaboration with Families

- Should there be something about the expectations of parents and families?

Section 5: Student Voice

- A more formal reference to the Lundy Model which focuses on Voice, Space, Audience and Influence, and the NCSE "Create" project that focuses on student participation across the school, as well as reference to the NCSE Relate document would enhance this section and assist schools in clarifying ways of working in this area.
- Resources such as "Talking Mats" (NCSE) can also assist in accessing meaningful student voice.
- It is good to remember that schools need to look carefully at this particular area, so that they do not continue with what might look like passive student councils instead of more active and more meaningful engagement of the students in order to get their opinion on all matters of school life.
- The student's voice needs to be always at the heart of every school as the fourth area of the Lundy Model, influence does not just refer to the student voice being heard, but it must be seen to have some kind of an impact on decisions and actions within the school community.

- The “Create” project provides valuable opportunities for reflection, collaboration and growth, and it also assists in the strengthening of the student voice and participation which ensures a better sense of belonging within the school.

Section 6: Professional Development

- This area is crucial to schools having success in dealing with the behaviours of concern. Reference to the school making a “*commitment to supporting staff through training and professional development*” is laudable, and reference to the NCSE calendar of CPD would be useful here. The prompt, however, refers to the Board of Management encouraging and supporting staff to engage in further training. This is a major area of concern for schools. The cost of buying in specific training, which only some schools can afford does not make for a cohesive plan.
- The lack of capacity of the NCSE to address the demand for training in this area is also to be noted. Many schools report an inability to access the training as it is frequently booked out. Such is the demand within the school community that we hear of schools prioritizing this area instead of other important areas. This remains the biggest concern for school communities.
- Special schools tell us that they pay for CPD, and have done so for years, to find that it must be updated regularly and they do not have the finance to cover this cost. Mainstream schools with special classes are now reporting the same story. Is there a plan to assist schools in this area to make training more accessible for the whole staff as this document outlines that *“well trained and confident staff are key to promoting positive behaviour, preventing crisis situations and responding effectively when they arise*.
- Should there be something about access to resources, staffing, external agencies?

Section 7: Recording and Reporting

- It would be useful to see the NCSE report template in this document.
- **Dynamic Risk Assessment** where de-escalation fails refers to a brief on the spot assessment in order to adaptively manage the risks in this ever-changing context. This sounds like a good plan, but the school would need to have had discussions about what this might look like or indeed have a short checklist for reference as things can happen very quickly.
- In the key components section of this Risk Assessment, “**Step back”** is mentioned as the first key component to evaluate whether immediate intervention is necessary. This is the time for **both the adult** and the student to regulate, breathe, and think before acting. **Assessing the threat**, **finding help and evaluating options** is a good idea, but this is a crisis situation and there should be a school protocol/procedure for this agreed in advance as all of this will happen in real time. **Continual Monitoring** should include a debrief on what to do differently next time as well as an evaluation of school approaches that may need to change.
- Physical restraint is mentioned by many schools as a huge challenge as the interventions on some of the training done by them does not always concur with the Behaviours of Concern Guidelines.

- Actions in the immediate aftermath checklist could be included in this document to make it easily accessible for school staff.
- The Post incident reflection “Staff Reflection Form” could be attached to this document to make it easily accessible.
- Debriefing samples could be attached to this document to make them easily accessible. Debriefing can be a challenge in school as staff who are affected by the behaviour in any way react in real time and cannot wait until later in the day. This can present a challenge for the number of adults required to supervise the pupils.
- Should there be information on Assault Leave for staff?