

IPPN Submission on Special Educational Needs

to the Joint Committee on Education & Youth

2nd July 2025



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Introduction

IPPN was invited to attend the Joint Committee on Education and Youth meeting on 2nd July to discuss the following five aspects of Special Educational Needs. This submission sets out IPPN's position on those areas.

- Special Education Teacher (SET) allocation, including the timing of when the allocations are being notified to schools;
- 2. Special Needs Assistant (SNA) allocation, including the timing of when the allocations are being notified to schools;
- 3. School building delivery, as it applies to the topic under consideration;
- 4. The scale of need, at a national level, if possible, as it relates to the topic under consideration; and
- 5. National Educational Psychological Service (NEPS) referrals.

IPPN Vision

IPPN's role as the professional body for school leaders is to empower the principals and deputy principals of primary and special schools to focus on their core purpose, and what they are qualified and skilled to do: the leadership and management of teaching and learning in their schools. This includes the 54% of principals and 98% of deputy principals who teach full-time on top of leadership and management responsibilities, which is often forgotten.

All the research shows that high quality leadership has a significant impact on the quality of learning and thus on the outcomes for children. Yet many school matters unrelated to teaching and learning take leaders' time away from their core purpose.

IPPN collaborates with our fellow education partners – management bodies, the union, the NPC - to support the aims that are in their remit, particularly where the aims align with those of IPPN.



IPPN fully supports the principle of ensuring equal access to quality inclusive education for all learners, alongside their siblings and friends in the local area in which they live.

Where children enrolling in a school has special educational needs, provision to meet those needs must be planned, supported and fully resourced, and cannot be limited by

- a. Lack of preparation time due to legislation limiting the admission application process
- b. budget constraints
- c. lack of capacity in the local school
- d. delays in the provision of adequate accommodation
- e. the need to have at least six children in a special class.

Special needs are either met or they are not and, if not, there is a consequential impact not only on the child with special needs but also on the other children in the class. If the level of resources made available within the system are dictated by budgetary constraints, then it cannot be claimed that special education educational needs are fully met. It can merely be asserted that special educational need is met only to the level allowed by the budget allocated for it.

Prioritising access to inclusive education in an appropriate setting for one cohort of children with additional needs, in such a way that it compromises access for another cohort of children with additional needs, is not equitable. The only realistic approach to identifying the full extent of need is to allow schools to self-report on the level of need in their schools.



Scale of Need

It is widely agreed that education systems will need to accommodate the additional needs of up to 5% of the population with ASD. In theory, this would mean that every 8-classroom school would require at least one special class specifically for Autism, in 2-stream schools, two classes would be needed, and so on. While there are already more than 3,300 special classes across the 3,000 primary schools, the ratio of 1 teacher for 6 children with additional needs in a special class means that far more classes will be needed to meet the demand. The detailed planning and resourcing that takes place has to be accelerated and enhanced if we are to meet the existing demand.

In reality, there isn't such a neat set of demands. Children with SEN don't come in groups of 6 in every catchment area. Children with SEN don't all have Autism. All children with Autism do not need access to a special class. There is a wide variety of need and it is spread across all types and sizes of school around the country. The vast majority of schools want to accommodate all children seeking to enrol and want to provide an equitable education for all children who do enrol, irrespective of their needs, additional or otherwise. What is clear is that the pace of change and resourcing has not kept up with the demands on the system, and this leaves children, parents, teachers and whole school communities to deal with the consequences.

This budget-driven 'deficit model' is at the heart of the issues we hear about from school leaders. There is a lack of time to ready the school and the special class to support the children enrolling, and the allocation of special education teachers and special needs assistants does not match the identified needs in schools. Resourcing for refurbishment, building projects, equipment and other supports is not adequate to meet the identified needs.

Further, pressures are being brought to bear on some schools to open additional special classes when other schools in the same catchment area do not have any. Others are being pressured to enrol a 7th and even an 8th child with additional need into classes



designed for no more than 6 children. This is unacceptable. Where such approaches are taken, at the very least schools need to be provided with emergency measures to enhance the SET allocation to meet the needs of the children being accommodated, until such time as a new special class place opens up, or a new special class is built.



School Building Delivery

Children, parents, school staff and school leaders are entitled to expect that the appropriate infrastructure is provided to give everyone, especially the children, an equal opportunity to succeed and thrive. Yes, it is critical that every child has a school place that is assigned in a timely fashion. But we must also ask of the system, what happens when the child turns up for their first day in school? Are the appropriate infrastructural supports in place that will give that child every chance to succeed and thrive? There has been progress, but we have a long way to go to achieve a truly inclusive system.

Flexibility in the provision of appropriate supports is key. IPPN is aware of many cases where schools have not been in a position to provide a fully-equipped and resourced special class for pupils enrolling in the school for the start of the school year. This can be where there are not the stipulated six children enrolled to create a special class, or where the timescales don't allow for a building project to be completed on time. It can also happen where there are too few places available to match the number of children with special needs seeking to enrol in the available special class(es). Greater flexibility is also required to support children who may be able for reintegration with the mainstream class for part of a day / week.

Call to action: As an interim measure, until such time as the new special class place can be provided or a new classroom can be built, IPPN calls for a SET+ Allocation Model, providing an emergency additional SEN and SNA allocation (as appropriate) to mainstream schools where a special class/school placement is delayed. This would ensure that children can attend school with their siblings, but in a suitable learning environment with the appropriate resources available on a temporary basis. The package of SET+ supports would also provide:

- adequate and timely grant funding to upgrade and enhance the available school accommodation
- the CPD required by school staff to fully include these children in the school/catchment area



 To enhance all schools' culture of inclusion, IPPN further calls for all CPD programmes attracting EPV days for teachers to include a module on inclusion from 2026.

Outside of the emergency SET+ Allocation Model, there are **key infrastructural supports** that are required to facilitate school communities in developing a culture of fully inclusive education. The commitment of all stakeholders is required to build a fully inclusive system that will succeed in practice as well as in theory.

Call to action:

Appropriate infrastructural supports would provide:

- Supports and services for schools, teachers, leaders, SNAs and boards of management in leading and managing special educational needs provision
- A mentoring programme to support those new to SEN roles or experiencing challenge
- A central portal with agreed processes and procedures to deal with the main scenarios around special education to include
 - template risk assessments and standard responses to staff, parents,
 unions and others
 - HR and legal guidance and support for school leadership and Boards of Management
 - o access grant funding and CPD to establish a special class

Including all stakeholders in enhancing the Summer Programme in Special Schools with support from a project manager worked extremely well and is an approach that can work just as well here. The Support Service could operate within NCSE in a similar way to FSSU works within DYE, with a project manager e.g. via a secondment.



SET Allocations and the timing thereof

Inclusion in its widest sense aims to enable participation, raise achievement, support wellbeing and create a sense of belong for <u>all</u> learners including those with special education needs and those who are most vulnerable to exclusion.

It could be said that the diversity of learner needs and profiles in schools may have outpaced the training and resources available, notwithstanding the huge efforts being made by organisations such as NCSE who are challenged by the sheer number of requests for support. We know that the health system is under huge pressure in this area and this leads to huge challenges for the education community and, in particular, in our schools.

The Special Education Teacher (SET) allocation is determined by a model that takes into account three factors: enrolment as determined by the school census returns on September 30th each year, (25%) educational needs profile as returned to the Department of Education and Youth through standardised test results (68.5%) in both literacy and numeracy, and social disadvantage (6.5%).

This model seeks to ensure that resources are distributed to schools across the country based on that school's specific needs and context, rather than solely on individual diagnoses. This model moved away from a diagnosis-led system to an identified needs-based system.

Schools then have the autonomy to prioritise their caseload and deploy this resource of SET teachers appropriately so that children with the highest level of need receive the highest level of support.



A SET Allocation Review process allows schools to apply through the NCSE portal if there is a change in the school profile. Reviews are conducted between March and May each year.

SET Guidelines and supporting documentation to aid schools in supporting Children/Young people with Special Education Needs was published in Dec. 2024 and updated in June 2025 to aid schools in the deployment of the SET team and to ensure best practice is observed in the school.

Schools receive this allocation on an annual basis. There is general agreement that the timing of allocations brought forward to February works better for schools for planning and recruitment to be effectively managed and to give staff certainty of tenure for year ahead.

The current situation where mainstream schools received their SET allocation on 11st February and special schools did not receive a summary of Teaching and SNA Allocations until June 16th, at the end of the school year. As we write this on 26th June, hospital schools have not yet received their allocation for the 2025/26 school year. This approach to special school allocations is simply not conducive to proper planning for the year ahead.

Call to action: A cutoff of the February mid-term needs to be put in place for <u>all</u> schools to receive both SET and SNA allocations.



Admissions Process

The current limitation whereby schools only have one year lead-in time to manage admissions is very problematic in terms of forward planning.

Call to action: IPPN has called for a two-year lead-in, which would give NCSE, school boards, parents and staff sufficient time to make provision for children with SEN. The Admissions Act needs to be amended to facilitate this.

The new approach to approval by NCSE of entitlement to a place in a special class streamlines the process considerably. Once capacity is fully in place, this will be welcomed by schools and parents alike.

Call to action: Ideally this would be enhanced further with a central portal – similar to the one available in Northern Ireland, and piloted in Dublin 15 and other areas – to centrally manage applications for admission to schools in a given area, and to provide key information to parents with regard to the process.

SNA Allocations

The work currently underway on SNA Workforce Development is very positive and will lead to more clarity and coherence across schools, boards of management, management bodies, unions and others, in how SNAs are supported, deployed and trained.

The timing of SNA allocations also needs to be brought forward to allow for adequate planning, recruitment and redeployment, well before the end of the school year.

Mainstream schools received notification of their SNA allocation on 25th May, less than a month before the end of the school year in many schools.



As noted above, the allocation of SNAs is not based on identified need. It is based on a capped number as set out in the annual budget. The incidence of special educational need is rising, and the allocations are not keeping pace.

There is a need for ongoing CPD for SNAs, particularly in the area of behaviours of concern. Such CPD could be provided more effectively and efficiently by providing CPD to whole school communities in catchment areas, rather than individually to small cohorts.



Teacher Supply

There are many and varied challenges around the supply of qualified teachers in primary schools and special schools, with the difficulties being most acute in Dublin and the surrounding counties, as these schools struggle to provide a full complement of staff. There is a shortage of qualified teachers available to our special schools each year. It is worth noting that teachers can specialise in SEN teaching in many countries where expertise in skills and knowledge is built up and maintained in special education in schools.

IPPN published a <u>Working Paper on Teacher Supply</u>, which was discussed within the Teacher Supply Forum, and a number of recommendations were put forward, some of which have been implemented. IPPN holds the view that a number of changes still need to happen to improve the situation:

 IPPN supports the Minister's announcement that Initial Teacher Education providers must ensure that trainee teachers undertake school placement in special education settings – special classes and special schools.

Call to action: This needs to be enhanced to ensure that such placements are supervised and assessed. This ensures a better understanding of, and practical experience in the knowledge and skills required for provision for children with SEN in all classrooms.

- CPD for whole-school staff in managing behaviours of concern and RELATE should be delivered to all schools in a catchment area at the same time, thereby creating local communities of practice.
- 3. There needs to be acknowledgement by the system of the importance of the SEN Coordination (SENCO) role in schools, and the expertise of SENCOs and



- school leaders who lead and manage special educational needs across the school, including in mainstream, in special classes and in special schools.
- 4. Teachers who undertake postgraduate studies in SEN should be acknowledged in some way.
- 5. The SENCO role needs to be recognised as a separate ex-quota post.
- 6. All teachers need to upskill to support children with special educational needs in their school community, to create a culture of inclusion, thus all CPD programmes attracting EPV days for teachers should include a module on inclusion from 2026.



NEPS Assessments

There are a number of challenges with regard to these assessments:

Every school needs access to an accredited educational psychologist, and is entitled to one, however all schools do not have one allocated, which causes huge difficulty in planning, accessing reports, supports, and, importantly, in relation to ongoing support and guidance.

Call to action: Recruitment of sufficient trained educational psychologists.

The low number of referrals available to schools causes significant concern and frustration, as school leaders have to prioritise among children based on identified need. This arises out of the school's continuum of support, including the student support file, which sets out the targets and the interventions already put in place.

Parents often lay the blame on schools when their child isn't prioritised, whereas it is the system that has imposed the restriction on the number of assessments per school.

Call to action: Increase the capacity for schools to refer children to NEPS.

Pilot projects currently underway on mental health supports may well yield positive results. This remains to be seen, particularly given the challenging in resourcing the pilots.

More children are presenting in school with emotional/ sensory/ behavioural regulation challenges, often resulting in behaviours of concern. Many of these children are unable to learn due to many and varied issues relating to their emotional state. Many of these children have additional needs.

A circular (24/2025) was issued in March whereby schools catering for children with Developmental Language Disorder (DLD) or Speech Sound Disorder (SSD) had to apply



new criteria for enrolment in these special classes, affecting 44 schools, and removing psychological assessments from the process entirely. There is significant concern that this circular will have a negative impact on these schools.

Many children, when assessed, are found to have dual diagnoses, which require additional interventions and supports. Without the psychologist's assessment and report, the extent of the child's needs will not be fully identified, thus challenging the school to put an appropriate programme of intervention in place.

These schools are very willing to pilot the new approach, and to work with the DEY, NCSE and NEPS to make it work, and are asking to delay the full implementation of the circular until learning from such a pilot can be ascertained.

Call to action: Support the calls for piloting of the circular before it is rolled out.



IPPN Submission to the NCSE and DEY on Special Class Provision - May 2025

Underlying Assumptions/Principles

- Inclusive education is understood in its widest sense with the goal of enabling participation, raising achievement, supporting well-being and creating a sense of belonging for all learners, including those most vulnerable to exclusion.
- 2. IPPN supports the principle of ensuring effective, equal access to quality, inclusive education for all learners.
- 3. Prioritising access to inclusive education in an appropriate setting for one cohort of children with additional needs, in such a way that it compromises access for another cohort of children with additional needs to inclusive education in an appropriate setting, is not equitable.
- 4. This applies equally to special class and special school provision.
- 5. With specific reference to the opening of special classes, all schools have a responsibility in this regard.
- 6. Such inclusion is planned for, supported and adequately resourced by all relevant services in accordance with the actual level of need that presents within the system.
- 7. If that is the case, there is no reason why any child who meets the criteria for placement in a special class cannot attend the same national school as their brother or sister
- 8. There has been significant increased expenditure in recent years in the area of special education.
- 9. The numbers of children presenting with additional needs who meet the criteria for placement have increased significantly in recent years and will continue to do so in the coming years.



- 10. The recruitment of additional SENOs/Team Managers will have a consequential positive impact on manageable caseloads and enhanced engagement and relationships with schools.
- 11. School staff will receive adequate training both in challenging behaviour and in effective strategies for planning, teaching and assessment in a timely manner to better ensure they have the expertise to meet the needs of children in special class setting
- 12. Special class settings will be in keeping with DE technical guidelines and specifications.

Acknowledgement

IPPN acknowledges the considerable commitment and efforts of all parties (the Special Education section of the DEY, the NCSE, Patrons, school leaders and Boards of Management) to ensure sufficient capacity exists within schools to accommodate all children who require placement in a special class. The fact that this has been achieved, in the main, earlier than in previous years is testament to the shared ambition to find solutions that best serve the interests of these children and their families.

Overview

The reduced timeframe for the Admissions process required under legislation does not afford sufficient time for the planning, support and resourcing to be undertaken that is required to facilitate the placement of children with complex additional needs in their local national school. This was raised by IPPN as an issue at the time the legislation was enacted.

The inadequacy of the current legislation came sharply into focus in June 2022, when a shortage of school places in special classes and special schools in Dublin was made a subject of media attention. It is IPPN's belief that this shortage of places, and the



similar issues that have arisen in subsequent years, are due, in no small part, to a lack of time to undertake the necessary planning, consultation and due diligence, to ascertain what actual capacity exists within schools to facilitate the opening of special classes, and the extent to which such capacity is suitable to meet the varied needs of a special class. The reduced timeframe for Admissions is a significant contributory factor.

The stipulations of Circular 0080/2024 to support forward planning for Special Education provision have made a positive difference. In particular, the requirement of parents to notify the NCSE by 1st February of their child's need for placement in a special class has assisted the process of identifying and planning for the provision of additional special class and special school capacity.

IPPN recognises the legal obligation of schools to share data on applications for admission to special classes or special schools with the NCSE, when requested to do so. IPPN further recognises that when "devising admission policies, schools are required to adhere to legal requirements, to guidelines developed by the National Council for Special Education (NCSE) and to circulars issued by the Department of Education on provision for children and young people with special educational needs".

Perspectives of School Leaders

With specific reference to the process of establishing new special classes for 2025/26, in areas where demand exceeded capacity, the following perspectives emerged from our engagement with school leaders:

There was a sense that expedience was a determining factor in the
identification of schools who were approached to open special classes.
 These were schools who had an available space/room and/or had a teacher
or teachers to be redeployed, even though they may already have opened



- special classes previously and had no applications from children in their catchment area for placement in a special class.
- 2. There was a sense that other schools were avoiding their responsibilities, particularly schools who had not previously opened a special class despite the fact that there were children awaiting placement in a special class who lived within the catchment areas of those schools.
- 3. There was a sense that some of the spaces/rooms that had been identified as being able to accommodate a special class were wholly unsuitable and would compromise the quality of provision to children in those classes.
- 4. There was a concern that schools were being asked to prioritise external applicants for places in special classes over children already enrolled in the school who met the criteria for placement in the special class.
- 5. Concern was also expressed that schools were being asked to accommodate more than 6 pupils in a special class for children with autism spectrum disorders.
- 6. There is a sense that applications made for support, in particular with challenging behaviours, can be very slow to process and result in school staff struggling to manage pupils in special classes and special schools.
- 7. There is a concern about a lack of understanding by parents of the school system and how it works, resulting in parents thinking that the only way to get specific resources for their children is through diagnosis and special provision, putting more pressure on the system.
- 8. School leaders feel that a missing piece of the jigsaw is being without NEPS support in the school and a poor Scapa system leaving them without assessments and psychological support for pupils.

Proposals/Recommendations

Amend the Admissions' legislation to allow schools to receive applications
on behalf of children who have a recommendation for placement in a special
class or school, up to 24 months in advance of their school start date. The



extended period that would be afforded by an earlier application would allow the school, in consultation with the SENO, to address what needs to be put in place to ensure the child's access to quality inclusive education. It would provide the parents of such children with certainty about school placement and would obviate the need for Section 37A powers to be invoked.

- 2. Until such time as the legislation is amended, and given that most schools complete their enrolment for the following school year during the first term, it would be preferable if parents notified the NCSE of their child's need for placement in a special class by 1st November, or as soon as possible thereafter.
- 3. Schools should ensure that their Admissions policies adhere to legal requirements, to guidelines developed by the National Council for Special Education (NCSE) and to circulars issued by the Department of Education on provision for children and young people with special educational needs.
- 4. All places in special classes should be filled in accordance with the admissions policy of the school, subject to that policy being compliant with the relevant legislation.
- 5. Where it is not possible for an individual school to open a full special class within the timeframe set out by NCSE, supports should be provided to enable the school to enrol the children using an enhanced emergency SET allocation to facilitate the child's attendance, until the special class can be opened. In this way, every school would provide for the children requiring placement in a special class in their locality.
- 6. School staff will receive adequate training both in challenging behaviour and in effective strategies for planning, teaching and assessment in a timely manner to better ensure they have the expertise to meet the needs of children in special class settings.
- 7. Ensure all rooms that are designated for use as special classes are upgraded to ensure they are in keeping with the technical guidance and specifications for such accommodation.