

Department of Education consultation: Children and Young People's Strategy initial 3 year Delivery Plan 2021-2024

CSSC, informed by our ongoing engagement with controlled schools welcomes the opportunity to comment on the Department of Education's consultation on the Children and Young People's Strategy initial 3 year Delivery Plan 2021 – 2024. CSSC understands that the strategy which is a legislative requirement under the Children's Services Co-Operation Act (NI) 2015, is designed to 'provide a Northern Ireland wide holistic structure to drive forward and monitor how Departments are progressing agreed outcomes to improve the wellbeing of children and young people.'

The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. To date 96% of controlled schools have opted in to register with CSSC.

The controlled sector is:

- large – it accounts for 49% of all schools and caters for over 146,000 children, making it the largest education sector in Northern Ireland
- diverse – providing education across all school types, i.e. nursery, primary, secondary, grammar and special schools. Within this, controlled integrated and controlled Irish Medium schools are included
- inclusive – providing education for children of all faiths and none (61% of pupils define as Protestant, 10% Catholic and 29% 'other') and 40% of newcomer pupils in Northern Ireland.

CSSC has five key functions.

- Advocacy - on behalf of individual controlled schools and the sector as a whole.
- Ethos - developing and maintaining the collective ethos of the sector.
- Governance - identifying, encouraging and nominating Governors to controlled schools and ensuring ethos is part of employment considerations.
- Raising standards - working with the Education Authority (EA) to raise educational standards.
- Schools' estate - assessing controlled provision, participating in area planning and engaging in strategic planning processes.

CSSC's vision statement is:

"The Controlled Schools' Support Council supports controlled schools, which are open to all faiths and none, in providing high quality education for children and young people to enable them to learn, develop and grow together, within the ethos of non-denominational Christian values and principles."

CSSC notes that the actions proposed by Departments will often deliver on more than one specific outcome and would note that the provision in controlled schools has the potential, where properly supported and resourced, to impact not purely on those outcomes associated with learning and achievement but all eight of the CYPs outcomes. Schools can address many of the barriers to pupils' wellbeing, however, it is important to acknowledge that schools cannot address all societal issues which impact on our children and young people.

CSSC notes that, supported by the views of stakeholders including groups of children and young people, the strategy identifies areas of greatest focus and initial priorities that the Departments should focus on. CSSC notes that many of these actions identify specific categories of children and young people for whom support should be provided. While this response may not comment on each of these categories, CSSC would emphasise its support for the development of actions which, linked to each of the 21 stated areas of greatest focus, help to progress children's rights.

CSSC welcomes the collaborative approach to delivering the outcomes outlined in the delivery plan. One of the key objectives of CSSC's Programme of Work is to build co-operation and engage with other sectors in areas of mutual interest to support the representation, promotion and development of the controlled sector. Our Programme of Work is developed to contribute to DE's Strategic Priorities, the draft Programme for Government and the key CYPs outcomes. By aligning our targets with these priorities we ensure that our work will support controlled schools to provide high quality education for children and young people to enable them to learn, develop and grow together, within the ethos of non-denominational Christian values and principles.

CSSC in responding to this consultation will focus on the strategic objectives outlined in our Programme of Work and will therefore comment on actions identified to deliver the following three outcomes: -

Outcome C: - Children and young people learn and achieve

Outcome G: - Children and young people live in a society which respects their rights

Outcome H: - Children and young people live in a society in which equality of opportunity and good relations are promoted.

Outcome C: - Children and young people learn and achieve:

The Independent Review of Education and the Expert Panel on Educational Underachievement's A Fair Start Report

CSSC welcomes the Strategy's intention to agree and deliver an appropriate implementation plan for the Independent Review of Education's recommendations. The diverse and inclusive nature of the controlled sector demonstrates that it is well placed to contribute to the future of education in Northern Ireland and the 3 to 19 age range of pupils in controlled schools identifies the sector as a significant partner in any recommendations. Pathways from Early Years through to Key Stage 5 are delivered by the controlled sector and CSSC is committed to promoting a whole community approach to supporting the development of children and young people and ensuring equality of provision for all.

CSSC will use this opportunity to endorse the findings and eight recommendations included in A Fair Start, the final report of the Expert Panel on Educational Underachievement. CSSC would note that these eight recommendations need to be implemented system wide with investment provided over a significant period of time. A short-term attempt to solve systemic issues will not provide the outcomes required.

CSSC's response to the CYPS initial 3 year delivery plan will echo many of the recommendations made in that report. It is vital that this opportunity is taken to raise the issues that in the absence of full implementation of the plan and its recommendations persist as the key issues for the controlled sector and their ability to ensure that children and young people are able to learn and achieve within our education system.

Acknowledging the Early Years as an important foundation for children's learning and achievement

CSSC recognises that the Early Years are a fundamentally important stage of learning and development. In its representational role for the controlled sector CSSC has developed its knowledge and understanding of the key issues which impact on early years' provision. Our engagement with practitioners has confirmed significant issues of concerns for the sector, issues which the Expert Panel on Educational Underachievement also acknowledged. These include, the crucial developmental role of the health visitor, support for children with Special Educational Needs, (SEN) the challenges caused by high numbers of penultimate age children in statutory pre-school settings, staff:child ratios across all pre-school education settings and standardisation of the pre-school day.

A refreshed early years' policy framework

CSSC notes the CYPS Delivery Plan's intended action of publishing a refreshed early years' policy framework by March 2023. CSSC representation is secured on a Working Group which will inform this work, however, due to the pandemic a decision was taken to postpone the refresh of the Learning to Learn policy. CSSC looks forward to the opportunity to contribute to this work and endorses the overall policy aim, 'All children have equal opportunities to achieve their potential through high quality early years education and learning experiences.'¹ The policy objectives, outlined in the Terms of Reference, have a significant contribution to make to achievement of the eight key outcomes of the Children and Young People's Strategy therefore progressing the refresh of this policy framework should be a priority.

CSSC would emphasise how play can contribute to these key policy objectives which include, support for the personal, social and emotional development of children, promoting positive learning dispositions and enhanced language, cognitive and physical development in young children. CSSC notes the focus given in the CYPS Delivery Plan to progressing interventions to reduce the impact of Covid-19 on children's education and would refer the Department

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file:///C:/Users/woodst/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/3Z7FVEQB/Terms%20of%20Reference%20-%20Learning%20to%20Learn%20Policy%20Framework%20(LtL)%20%20%20Refresh%20.._%20(003).pdf

to research on the impact of the pandemic on play in practice. This research, carried out in partnership by Playboard NI, Stranmillis University College and CSSC, led to the following recommendations.

Action 1: Need for greater value to be assigned to play in the home and support parents to develop and extend play within the home environment.

Action 2: Need for further guidance on managing play during the pandemic.

Action 3: Need to prioritise outdoor play and outdoor learning in the school environment post pandemic.

Action 4: Need for professional development in the early years.

Action 5: Need for further research into the impact of the Covid-19 crisis on children's holistic learning and development.

Action 6: Need to prioritise play more fully in practice across Northern Ireland schools and early years settings post pandemic².

CSSC welcomes the Department's support for Play Matters, referenced in the CYPs Delivery Plan, and the acknowledgment of how play can contribute to children's learning as well as their emotional health and wellbeing. CSSC also contends that providing playful learning opportunities for all children across all phases of education is necessary and would emphasise the importance of the recommendation in A Fair Start in relation to promoting and equipping the teaching workforce in the Early Years and Foundation Stage to embed play based approaches to learning.

Proposed Framework for Children in the Early Years with SEN

Concerns about support in the early years for children with special educational needs (SEN) have been voiced by controlled schools since CSSC's inception. CSSC welcomes the CYPs Delivery Plan's intention to progress publication of the proposed framework for children in the early years with SEN. CSSC submitted a response to the EA's consultation on this matter in May 2018 and noted agreement with the proposals to strengthen support which precedes the pre-school year and subsequent support from the EA Early Years Inclusion Service. Additional support for mainstream pre-school settings is critical and therefore adequate resources to ensure that the Early Years SEN Inclusion Service has sufficient Early Years Practitioners to support nursery schools and units is essential, as is the ability of schools to access the knowledge and expertise of other EA Pupil Support Services. CSSC believes it is critical that the proposals included in the framework are considered without further delay, progressed and sufficiently resourced.

Health and Education working together in the early years

CSSC notes the CYPs Delivery Plan's intention to establish infant and early years' health and wellbeing from the outset through a number of projects developed under the Early Intervention Transformation Programme (EITP), which include the suite of Getting Ready to Learn programmes. CSSC notes the introduction of a 3+ review by health visitors delivered in pre-school settings, a key component of the Getting Ready for Toddler programme, and

² <https://www.playboard.org/wp-content/uploads/2021/06/Full-Report-Play-in-Practice-During-the-Pandemic-June-2021-1.pdf>

endorses this model of provision. CSSC has previously expressed concerns about regional inconsistencies in access to health visitors and failures to identify and provide the earliest possible support for children with SEN during 0 to 3. Principals in controlled schools, across all phases of education, have called for strengthened partnerships with Health and Social Care Trusts and for multi-agency collaboration to meet the needs of children with SEN as early as possible. Access to the advice and support of health visitors is crucial in enabling parents to avail of appropriate support for their children in the years preceding and during pre-school education.

CSSC is represented on the SEND Strategic Reference Group which informs the work of the DE/EA Send Programme Board and through this is aware of the projects which are being advanced to address and better support early identification of special educational needs. Data held by Health and Social Care Trusts, if shared, could better inform an analysis of the needs of children coming through the system. It is crucial that there is meaningful collaboration between Education and Health to facilitate appropriate sharing of data which could inform education planning, regarding the type of support and training necessary in schools and accommodation requirements.

Executive Ten Year Childcare Strategy

CSSC notes the intention to develop and publish the Executive Ten Year Childcare Strategy and, subject to availability of funding, ensure the strategy and its actions are based on robust evidence relating to the current childcare landscape. CSSC understands that standardisation of pre-school education session times is being considered in the context of the development of a new Childcare Strategy and welcomes the commitment to consult with key stakeholders and relevant government Departments on an area of work which has a number of associated opportunities and risks. CSSC notes the recommendation within A Fair Start that DE should standardise the length of pre-school education provision to at least 4.5 hours per day and that the report called for a review of staff:child ratios. CSSC believes that consideration of standardising pre-school session times presents a timely opportunity to review appropriate staffing levels which could allow settings to further enhance support for the wellbeing of all children and especially those children presenting with special educational needs.

The relevance and appropriateness of curriculum and assessment/Supporting appropriate transitions

Based on evidence, recommendations with associated actions were included in A Fair Start in relation to ensuring the relevance and appropriateness of curriculum and assessment. CSSC considers this to be particularly relevant to supporting the wellbeing of children and young people and again endorses the CYPS intention for the Department of Education to take forward the Expert Panel on Educational Underachievement's recommendations. CSSC contends that learning happens best when it is seen as relevant to the interests and aspirations of pupils. CSSC would concur with the Panel's findings that whilst the design of the NI Curriculum is broadly sound, its delivery in school is impacted by a focus on assessment outcomes. CSSC notes the acknowledgment within the report that in the absence of NI Curriculum specific standardised tests at KS1 to KS3, schools are investing in

commercial assessments ‘which leads to varying practice in the purpose and timing of assessments and use of data’. CSSC agrees with the Panel’s recommendation that ‘a diagnostic assessment tool should be developed by CCEA in partnership with educationalists and in consultation with teaching unions with sample data to be used for system level measures including an agreed ‘value added’ measure’.³

At KS4, current measures of success focused mainly on the attainment of 5 GCSEs grades A* to C, including English and Maths, gives less credence to the value added element of the learning process for many pupils and leads to a neglect of the development of wider attributes and dispositions that education should be supporting. CSSC therefore welcomes the proposed CYPs Deliver Plan’s action to implement the Department of Education Standards and Learning Programme to support school leaders and teachers in this key area. CSSC has a specific role to play alongside the Education Authority in supporting controlled schools in raising standards. Within our Programme of Work, the Building Capacity Programme supports controlled schools to implement effective approaches to lead school improvement by supporting the capacity of senior leaders to embed evidence informed practice, conduct rigorous self-evaluation and lead improvement in line with the Department of Education’s Learning Leaders Strategy.

Improving access to vocational pathways is also key and non-selective post-primary leaders have expressed concerns about the barriers to developing these routes at KS4 citing obstacles encountered in trying to establish vocational qualifications. The employment of local plumbers, electricians and carpenters with appropriate Enhanced Disclosure Checks in place, could support the delivery of more vocational pathways if barriers to short-term contracts for professionals from these occupations were addressed. CSSC notes the recommendation within A Fair Start that ‘there should be increased collaboration between public, private and 3rd sectors to maximise opportunities for young people enabling them to be better informed about their education, training and employment pathways. Young people should be at the centre of this.’⁴ Schools should be supported to fully understand the different pathways available to their young people. CSSC notes the CYPs Delivery Plan’s associated key actions of taking forward a new Level 2 traineeship and also a Vocational Education Award at Level 3. CSSC endorses these actions and whilst acknowledging the partnership approach that exists with Further Education, more still needs to be done to promote vocational pathways which will lead to employment opportunities which enable our young people to enjoy economic wellbeing and be well placed to make a positive contribution to society.

CSSC believes that all our children and young people should be supported to make a positive contribution to society and welcomes the Delivery Plan’s commitment supporting the most appropriate transitions for all children. CSSC is aware of concerns in relation to the lack of provision to support pupils in special schools, post-19 and is aware that the Transitions project is one of the areas of work being taken forward as part of the SEND Strategic Development Programme. Controlled special schools have referred a void in the support

³ <https://www.education-ni.gov.uk/sites/default/files/publications/education/A%20Fair%20Start%20-%20Final%20Report%20and%20Action%20Plan.pdf> – p23

⁴ <https://www.education-ni.gov.uk/sites/default/files/publications/education/A%20Fair%20Start%20-%20Final%20Report%20and%20Action%20Plan.pdf> – P24

that young people receive when they transfer to Adult Services and it is strongly felt that proper multi-agency working is required to improve this situation. The 2014 Northern Ireland Assembly Research and Information Service Briefing Paper⁵ on Transition Planning in Northern Ireland refers to a variety of small scale transition support programmes available to young people with disabilities, however, the paper highlights regional inconsistencies in terms of access to these programmes and as they are delivered by voluntary and community organisations their resources are limited. Special schools have commented on the anxiety suffered by parents as they look towards this transition which in their view does not present any opportunity for continued learning. Moreover, it is noted that the opportunities for supported employment are often limited. The report on Transition Planning was published in 2014 and yet the concerns in relation to the inconsistent arrangements to support the transition of young people with special educational needs persist. It is crucial that support for some of the most vulnerable young society is progressed and that children leaving special schools are supported to access the most appropriate of pathways.

Taking Boys Seriously – Maximising boys’ potential

CSSC notes the recommendation within A Fair Start regarding maximising boys’ potential and would also highlight the Ulster University’s Taking Boys Seriously⁶ project, co-supported by CSSC, which has worked through research and practitioner support to develop and test a set of holistic relational educational principles aimed at igniting boys’ motivation, aspirations and attitudes towards education and learning. The further implementation of these principles at a system level to support boys in maximising their potential should be prioritised.

CSSC notes the recommendation within A Fair Start that boys’ needs ‘should be met through effective networks with the local community’⁷ and would highlight the Thrive project in Rathcoole and Monkstown as a model of effective practice which provides a consistent approach to creating key links between parents, schools, community groups and statutory and voluntary organisations at local level to assist them to work together to help children and young people do well. This model of collaboration reflects the aspirations of the CYPS Strategy which also prioritises multi-agency collaboration. The Minister’s recent announcement of funding to support the work of Monkstown Boxing Club, a vital partner in this project, is an acknowledgment of effective practice which should be replicated and adapted throughout Northern Ireland.

CSSC’s Engaging with Sign – a language for you and me – Supporting learning and inclusion

CSSC notes specific reference to our contribution to the CYPS outcomes in the context of the work of the Sign Language Partnership Group (SLPG). Since September 2018 CSSC has secured funding to enable delivery of a programme of sign language workshops to controlled schools. Through this work CSSC has contributed to the SLPG’s key funding

⁵http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2014/employment_learning/6514.pdf

⁶ <https://www.ulster.ac.uk/about/widening-access/initiatives/taking-boys-seriously>

⁷ <https://www.education-ni.gov.uk/sites/default/files/publications/education/A%20Fair%20Start%20-%20Final%20Report%20and%20Action%20Plan.pdf>

priority of building capacity to raise the profile of sign language as a linguistic and cultural minority language and a language of 'need' for deaf people in order to raise awareness and understanding within the NI community. CSSC determines eligibility by considering the DE census data and identifying those schools recorded as educating children with severe/profound hearing loss. By the end of June 2022 CSSC will have delivered Engaging with Sign – a language for you and me to 33 controlled primary schools. The first programme saw 9 schools receive 4 hours of pupil workshops and a 1.5 hour workshop for parents. The second, interrupted by the pandemic, saw 14 schools receive 4 hours of sign language workshops with the public health situation meaning that parent workshops were no longer part of the programme. Our third programme has been expanded and the 10 participating schools will receive 6 hours of pupil workshops and a staff workshop of 1.5 hours duration.

Evaluations of the programme demonstrate that the workshops have been extremely well received with Principals noting benefits for both the deaf and the hearing child. The programme is an excellent example of inclusion, however, it is a programme that CSSC, as a result of competing priorities will find difficult to continue to deliver. CSSC is aware that there is a significant appetite for sign language learning in schools as a means of enhancing communication for the deaf child but also as a language in its own right. CSSC believes that in working towards the key outcome of enabling all children to learn and achieve and in recognition of the rights of disabled children consideration should be given to mainstreaming a programme of this type.

CSSC recognises the challenges of delivering such programmes, not least because of the insufficient number of sign language interpreters in Northern Ireland. CSSC would contend however, that this is not an insurmountable problem and if investment was made in promoting sign language learning the lack of sign language interpreters could be addressed and the communication skills of many deaf children enhanced. The potential emotional health and wellbeing impact of such measures also cannot be underestimated. CSSC conducted a roundtable discussion in May 2019 to discuss the key learning and outcomes from the first sign language programme and representatives from Action Deaf Youth, the British Deaf Association, and the National Deaf Association were in attendance. CSSC is proud to be contributing to this work and complementing the well-established efforts of these organisations. CSSC would encourage the Department of Education to engage with these key organisations as well as the Department for Communities' Sign Language Partnership Group, the Education Authority and CCEA to explore what more could be done to deliver on a key action with such tremendous potential to impact on the wellbeing of children and young people.

Outcome G: - Children and young people live in a society which respects their rights

CSSC welcomes the actions outlined in the delivery plan which address crucial issues such as child poverty and note the intentions to extend the Child Poverty Strategy, the Department of Communities' development of an Anti-Poverty Strategy and the project, People and Place – A strategy for neighbourhood renewal. CSSC understands the correlation between poverty, adverse community environments and underachievement and welcomes work in this area.

CSSC notes that the Department of Education in their work to progress interventions to substantially reduce the effects of social disadvantage will make the reporting of Targeting Social Need (TSN) mandatory and deliver the Extended Schools Programme, Full Service Programmes, North Belfast Primary Principals' Support Programme, Sharing the Learning Programme and West Belfast Community Partnership programme as well as deliver free period products in schools by September 2021.

CSSC is aware of the Northern Ireland Audit Office report: Closing the Gap-Social Deprivation and links to Educational Attainment, and the concerns expressed in this report regarding the use of TSN funding and whether it is having the intended impact on addressing underachievement. CSSC is of the view that this funding is vital for schools and would highlight the attainment gap between non-FSME and FSME school leavers as an indication of that need.

CSSC notes that under Local Management of Schools arrangements there is flexibility in the use of TSN funding and supports the view that schools are best placed to understand the challenges that need to be addressed in their context for the benefit of the school community. CSSC notes the report's recommendation that completion of the TSN planner be made mandatory and CSSC would recommend that in taking such a measure that the Department of Education explores barriers to completion of the TSN planner and considers the support and guidance required. Supporting schools with examples of best practice and ensuring that the reporting requirements are not an administrative burden are crucial to ensure that schools are supported in their use of this necessary funding.

Extended Schools funding is also valued by schools, however, CSSC is aware of concerns from a number of controlled schools which were deprived of the funding this year due to the delayed recording of a number of pupils eligible for FSME which resulted in schools being unable to meet the necessary criteria for eligibility. It is CSSC's understanding that a number of schools found themselves in this situation during the 2021/22 academic year. CSSC is aware that this funding is available for those schools educating pupils in areas with levels of high deprivation and the activities and opportunities resourced by this funding are a crucial support for schools in supporting these pupils. Losing access to this funding can deprive schools of services that have had positive impacts in supporting children and young people and also the wider school community. The programme has also facilitated effective collaboration between schools. CSSC welcomes that delivery of the Extended Schools programme which is seen as a crucial means of ensuring the wellbeing of children and young people and, conscious that the Department does operate a 'buffer zone' which allows previously funded schools that fall a few percentage points below the relevant thresholds to be partially funded for a period of 1 year, CSSC would recommend that the Department consider how to correct a school's eligibility in the circumstances where the school experiences in-year movement with pupils from the target neighbourhoods admitted to the school after the DE census data is captured.

CSSC notes and endorses the CYPs Delivery Plan's intention to 'enable young people from low income backgrounds to remain in post compulsory education at school or college' by continuing provision of the Education Maintenance Allowance.

Outcome H: - Children and young people live in a society in which equality of opportunity and good relations are promoted.

System wide change required to meet the needs of children with SEN

CSSC endorses the establishment of the SEND Strategic Development Programme as a mechanism for taking forward the NI SEND Change agenda and as a crucial means of achieving one of the CYPs Strategy's areas of greatest focus, namely that of an improved experience for children and young people with special educational needs. As a member of the Programme Reference Group the Controlled Schools' Support Council welcomes the opportunity to be meaningfully engaged in a process which will work to ensure that the views of all stakeholders are represented in an effort to ensure that the SEND system is able to respond early and is adequately resourced to effectively meet the needs of children and young people with special educational needs. CSSC has a specific role to play in advocating on behalf of the controlled sector and we are informed by the experience and expertise of staff and Governors in controlled schools. Through participation on this group and regular engagement with officers within the Education Authority's Children and Young People's Services CSSC is able to communicate the key issues impacting on schools' ability to meet the needs of all children. CSSC is very much aware of the legislative context for this change agenda and is conscious of the work that schools are undertaking to prepare for implementation of the SEND Act 2016 supported by the Education Authority's SEND Implementation Team. CSSC has responded to the Department's consultations in relation to the draft SEN Regulations and the new Code of Practice and highlighted key areas of concern for the leaders and Learning Support Co-ordinators of controlled schools across all phases of education. CSSC agrees with the SEND Strategic Development Programme's vision and desired outcomes and believes that the projects for which business cases have been prepared, and which await approval by the Department of Education, reflect the key areas which are priorities for school leaders and which have been communicated as areas of significant concern for a number of years. It is crucial that these projects are able to advance and support the efforts of staff and Governors in controlled schools to meet the needs of all children. CSSC will defer from naming each of the proposed projects here and refer the Department to our response to the SEND Strategic Development Briefing Paper, included in the appendix, which includes detailed comment on each project.

CSSC will, however, refer to more recent pressing concerns regarding pressures on the Education Psychology Service. CSSC is aware that lack of access to Stage 3 pupil support services is creating a situation in which parents feel that the only option available to them to support their child is to make an online referral for statutory assessment. CSSC notes that some of these referrals do not meet the criteria for assessment but they will however, divert Educational Psychologists' work to statutory assessment rather in delivering the appropriate interventions in schools. CSSC is conscious that the Time Allocation Model impacts on schools' ability to recommend all children that they feel require assessment and there are concerns that the online parent referral system will impact on schools' time allocation and have a detrimental impact on those who most require referral for statutory assessment. CSSC is aware of a lack of Educational Psychologists and would recommend that

the Department explores all avenues to address workforce pressures regarding availability of Educational Psychologists.

Supporting enhanced collaboration between Education and Health

Effective collaboration between Education and Health is one of the key areas of concern for the leaders of controlled schools and is very much required to ensure that the most appropriate therapies and interventions are developed and delivered to meet the needs of children and young people with SEN. As previously highlighted, the sharing of data with appropriate procedures in place, in relation to the needs of children from birth is also crucial in planning for the most suitable of placements and in ensuring that the schools' estate is able to respond effectively to meet the needs of all children. Data from Public Health Visiting could provide information regarding the numbers of children with complex needs, the nature of that disability or need and inform accommodation requirements and training required by school staff to meet the increasing complexity of need presenting. CSSC is conscious that the Special Educational Strategic Area Plan, which is currently the subject of public consultation, seeks to address pressures on the existing schools' estate. Special school leaders in controlled schools have expressed support for the aspirations of the document, however, are concerned that temporary accommodation will not address the lack of suitable accommodation which is the experience of many special schools with rooms previously used for therapies and interventions being given over to creating classrooms and resulting in accommodation without the necessary breakout rooms or space for specific therapies and interventions to be delivered. With an increase in challenging behaviour in special schools it is crucial that some children have the space to be able to deal with sensory processing difficulties which impact detrimentally on their emotional health and wellbeing. Controlled special schools are also conscious of the long timescales associated with new builds and minor works. It is therefore vital that support is provided in the interim and that any temporary accommodation required is fit for purpose and informed by the requirements of special school leaders.

Identification of special educational needs at the earliest possible opportunity, effective multi-disciplinary support, an evaluation of school based innovations in supporting learning and ensuring that staff working to support the needs of pupils with SEN have access to quality assured training on a regular basis in the most effective interventions are key strategic aims which require appropriate resourcing and effective collaboration between Education and Health.

Shared Education's contribution to promoting diversity and mutual understanding

CSSC notes the inclusion of the duty to encourage, facilitate and promote Shared Education in the Delivery Plan as an acknowledgment of the significant contribution that Shared Education Programmes can make to the wellbeing of children and young people, encouraging mutual understanding and also enabling enhanced shared learning opportunities. One of CSSC's key functions, as previously stated, is to engage with other sectors in areas of mutual interest including the promotion of tolerance and understanding. As part of our work in this area we seek to encourage and facilitate shared education in controlled schools. CSSC understands that all stakeholders in Shared Education have a

collective responsibility to create an education system which provides children and young people with positive Shared Education experiences which contribute to a more peaceful and shared society.

CSSC engages with organisations such as Community Relations in Schools (CRIS) promoting various programmes which include most recently 'Buddy Up', a peacebuilding programme which was recognised in 2017 as a 'transformative peacebuilding method' which encourages inter-school sharing and positive relationships. CSSC has supported schools in making applications for T:BUC funding and also participates in the assessment panels which review and assess applications for T:BUC funded programmes and activities.

CSSC recently responded to the draft mainstreaming Shared Education Strategy and highlighted a number of challenges to participation in Shared Education which includes pupil numbers, class sizes, rurality and community dynamics. If we aim to reach a position where all children and young people in Northern Ireland have the opportunity to experience quality shared learning, there needs to be a clear pathway to overcome these challenges.

CSSC is concerned that there are controlled schools which have not yet had the opportunity to engage in Shared Education and strongly advocates for the resource to enable this to happen. Professional development of teachers and other staff is vital for the Strategy to mainstream Shared Education. Leaders require the skill sets to embed Shared Education within their organisations, to lead on the Strategy and empower others to lead. All Education Bodies and Sectoral Bodies need to have the capacity to support schools and settings and work in collaboration to support Shared Education.

CSSC recognises the important role school ethos and values play in establishing a learning environment where there is a culture of sharing and respect for others. Boards of Governors and school leaders have the responsibility of embedding such culture and encouraging working with other schools, as well as advocating Shared Education and its benefits to the wider community. CSSC has a specific function in supporting Governors to lead ethos in controlled schools and strives to make a significant contribution in this area highlighting the opportunities to participate in shared education partnerships. CSSC welcomes the intention to develop an implementation plan for the mainstreaming of Shared Education and would welcome the inclusion of the Strategy and Implementation Plan in Governor training.

Supporting Newcomers, Traveller and Roma children and young people

CSSC supports a number of controlled schools with significant numbers of newcomer, traveller and Roma children and is represented on the Trauma Informed Advisory Group for Fane Street Primary School where 88% of the pupils speak English as an additional language and with 43 languages spoken throughout the school. The school is sensitive to the cultural needs of its school community, 16.4% of whom are refugees/asylum seekers, and in taking a trauma informed approach to its provision, has received School of Sanctuary Status. The school employs a Nurture Co-ordinator, among many other innovative strategies to support all children including those children who may present with social, emotional and behavioural difficulties. CSSC, conscious of the cross-departmental approach to meeting the needs of all children notes the associated key actions to support those children and young

people for whom English is not their first language and notes the reference in the CYPs Delivery Plan to the work of the Urban Village Initiative, the Schools of Sanctuary programme and the aforementioned CRIS Buddy Up programme. CSSC acknowledges the positive impact of these programmes and would also highlight the work of the Education Authority's Schools' Trauma Advisory and Referral Service (STARS) team which, with the input of Education Psychologists works to support newcomer children who have experienced trauma.

In October 2019 CSSC offered comment on behalf of the controlled sector regarding the Department's consultation on Supporting Newcomer Pupils expressing support for increasing the duration of newcomer designation. CSSC also advocated that no changes should be made to the newcomer factor and that the funding should remain a part of the Common Funding Formula as it allowed schools to take a holistic approach to supporting newcomer pupils which also takes cognisance of the needs of the whole school community. This flexibility has allowed for an investment in staffing and the recruitment of additional classroom assistants not only to support the newcomer pupils but also to allow the teacher to meet the needs of every child ensuring that classes with the challenges of supporting the language acquisition of newcomer pupils does not compromise efforts to meet the needs of all pupils within the school. CSSC raised specific concerns about the assessment of newcomer pupils for special educational needs and reported a perceived reluctance by the Educational Psychology Service to confirm a special educational need because of the language barrier impact on tier ability to assess the child. CSSC more recently is aware of more than one instance where a newcomer child has commenced their pre-school education with a specific disability or impairment which had not been identified prior to the pre-school year because the child was not known to Health and Social Care Trusts and therefore parents had not received access to the support of a health visitor who would have been able to provide professional advice on the child's development. CSSC is unaware of a published analysis of the responses received to the 2019 consultation and whether these responses will inform the Department's work to meet the needs of newcomer children going forward.

Supporting the emotional health and wellbeing of children and young people and those who work with them

CSSC welcomes the Strategy's commitment to take forward the delivery of programmes and services to support the Children and Young People's Emotional Health and Wellbeing in Education Framework and welcomes that Framework's assertion of 'our collective responsibility in supporting the emotional health and wellbeing of our children and young people and those working with them.'

A key strategic objective for CSSC is working with controlled schools to develop and maintain a collective and inclusive ethos. CSSC's recent governor training programme has raised awareness of, as well as promoted, the whole school development of a Trauma Informed Practice approach to supporting the emotional health and wellbeing of pupils, staff and the whole school community, including parents. CSSC's work in this area corresponds with the 'Whole Child, Whole School, Whole Community' approach advocated in the Children and Young People's Emotional Health and Wellbeing in Education

Framework and supports leaders to achieve the Framework's aspiration that 'leadership prioritises a culture and ethos that promotes a sense of caring, belonging and respect for all and plans strategically to improve emotional health and wellbeing for all.' ⁸

Supporting Trauma Informed approaches

CSSC notes that the Delivery Plan for the Children and Young People's Strategy commits to establish infant and early years health and wellbeing from the outset and have mainstreamed a number of projects developed under the Early Intervention Transformation Programme including a Trauma Informed project. CSSC welcomes this approach and recognises the impact that adverse childhood experiences can have on a child's brain development, their ability to form attachments, to regulate their emotions, their cognitive functions and to be able to thrive. CSSC is aware of a number of controlled nursery schools which have engaged with the Solihull approach training which has enhanced their ability to support the children in their schools and to recognise how children's behaviour can be a means of communicating trauma enabling staff to respond appropriately.

CSSC recognises the importance of this approach but believes that its relevance to all phases of education and welcomes the principles of the Children and Young People's Emotional Health and Wellbeing in Education Framework's emphasis on supporting self-esteem, self-regulation, the creation of secure and safe environments and a recognition that all behaviour is communication. Trauma Informed approaches to supporting the emotional health and wellbeing of children and young people are extremely important and relevant throughout a child's development as noted in the Children and Young People's Emotional Health and Wellbeing in Education Framework which recognises '50% of mental health problems are established by the age of 14.' ⁹

Trauma informed approaches encompass a range of interventions which include the support that schools put in place for children with special educational needs, newcomer children and children looked after and are relevant for members of the whole school community. CSSC has worked closely with the Safeguarding Board NI and is on the Trauma Informed Practice Advisory Group for two controlled schools. Using a Quality Assurance Framework both schools have been supported to consider what further support is required to allow the schools to continue to improve outcomes for children. To date the pilot programme has led to increased multi-agency working and enhanced training opportunities for staff, which has included coaching opportunities and ethos development sessions from CSSC and Theraplay training from the EA.

CSSC notes that a key aspect of delivering the Children and Young People's Strategy is collaboration across all government Departments and with relevant community and voluntary groups/external agencies. To facilitate all schools in Northern Ireland to adopt the

⁸ <https://www.education-ni.gov.uk/sites/default/files/publications/education/Children%20%26%20Young%20People%20s%20Emotional%20Health%20and%20Wellbeing%20in%20Education%20Framework%20%28final%20version%29.PDF> – Foreword iii

⁹ <https://www.education-ni.gov.uk/sites/default/files/publications/education/Children%20%26%20Young%20People%20s%20Emotional%20Health%20and%20Wellbeing%20in%20Education%20Framework%20%28final%20version%29.PDF> – p1

model used by the schools in the pilot programme requires a commitment from the Department of Education to build on the investment that has already been made to raise awareness of Trauma Informed Practice in Schools. CSSC is represented on the Education Authority's Trauma Informed Practice Steering Group and has informed the content of the online Level 1 Trauma Informed Practice awareness training. CSSC is mindful that while we will be able to contribute to the EA's efforts to roll out Trauma Informed Practice training, trainers are performing other crucial work that prevents them from contributing more to this work. CSSC is conscious that as a result of the Statutory Assessment Improvement Project Educational Psychologists are increasingly being taken away from work in schools which would support a trauma informed approach. CSSC is of the view that there should be an audit of need in schools and the relevant roles developed to support the most effective interventions and to support capacity building in schools.

Support for care experienced children and young people

CSSC supports the goal of working to ensure improved educational and personal achievement of care experienced children and notes the 2018 Department of Education publication of the resource booklet Putting Care into Education which promotes an attachment and trauma informed approach to meeting the needs of care experienced children and young people. CSSC welcomes the CYPs Delivery Plan's intention to progress implementation of the commitments to action in the joint Health and Education Strategy, A Life Deserved – Caring for Children and Young People in Northern Ireland.

Putting Care into Education was well received by controlled schools which have implemented the practical advice included. Adopting a trauma informed approach to supporting the emotional health and wellbeing of children and young people can contribute to developing resilience which can actively support educational achievement as children with higher levels of emotional and social wellbeing are more engaged in school and therefore better able to achieve improved learning outcomes.

CSSC's is aware that several Education Authority services deliver training and interventions which can be described as trauma informed including the Nurture Approaches in Schools Service (NASS), the Children's Looked After Service, the Intercultural Education Service and the Educational Psychology Service. CSSC is aware that NASS and the Children's Looked After Service are recruiting additional officers and CSSC supports the resourcing of these additional roles and believes that expanding the reach of all of these services, in particular the Education Psychology Service has the potential to deliver for all children and young people. CSSC is mindful of the Expert Panel on Educational Underachievement's recommendation that 'there should be whole school nurture approach adopted across all school sectors and the number of DE funded Nurture Groups should be expanded as part of wider Nurture in Education Programme.' CSSC welcomes the Education Authority's efforts to embed a Trauma Informed approach across its services.

Supporting the response to challenging behaviour and protecting staff wellbeing

Supporting the emotional health and wellbeing of those who educate our children and young people is also key and CSSC notes the Children and Young Peoples' Emotional Health in Education Framework's acknowledgment 'that if staff are not effectively supported they cannot be expected to properly support the children and young people in their care.' CSSC further notes the recommendation in the Framework of the necessity of fostering 'a culture of trust where all staff feel valued and know how to access support if needed, for example, through the use of staff debriefing/supervision.'¹⁰ CSSC notes that staff in controlled schools are often put at risk of what can be referred to as secondary and vicarious trauma which stems from working in emotionally demanding roles, roles in which they sometimes do not feel appropriately equipped, resourced or supported. The stress that this can cause for staff does require the support which could potentially be provided through the debriefing/supervision opportunities referenced in the Framework but Principals note that this is an area for which staff are not specifically trained and it should therefore be a priority to identify who is best placed to provide this type of support and identify the relevant training required to allow staff to be equipped to perform such an important role.

As previously highlighted, CSSC is aware of growing concerns regarding the increase in challenging behaviour for pupils across all phases of education. Anecdotally, CSSC believes that staff under-report occasions of assault experienced out of loyalty for the children that they support. With challenging behaviour accompanying the increasing complexity of need in special schools the adult:child ratios are insufficient compared to a healthcare setting where the same children would be supported by more adults. Increased incidents of challenging behaviour are also an issue for mainstream schools which report that they feel unsupported in responding to challenging behaviour which has the potential to impact significantly on the wellbeing of the child and also staff emotional health and wellbeing.

CSSC since its inception has been very much aware of school concerns about the lack of guidance in relation to restraint and recently attended the Northern Ireland Commission for Children and Young People's launch of their Review of Restraint in Seclusion in Educational Settings. The Review highlighted that 88% of special schools reported having received training on restrictive practice and 23% of mainstream schools. CSSC is aware of concerns of controlled special schools where those who have been trained as trainers in Team Teach have moved on leaving new staff without the appropriate training. Mainstream schools with specialist provision report that they are not able to access Team Teach and are therefore deprived of the training in the de-escalation strategies that pre-empt and have the potential to negate the need for physical restraint. CSSC would echo NICCY's¹¹ calls for the Review to be considered in a timely manner but more importantly for schools to receive the necessary guidance, support and training to ensure confidence and assurance that the means they use to respond to challenging behaviour are the most appropriate and effective means which protect the dignity, safety and wellbeing of both pupils and staff.

Therapeutic and Counselling Services in Schools

¹⁰ <https://www.education-ni.gov.uk/sites/default/files/publications/education/Children%20%26%20Young%20People%20s%20Emotional%20Health%20and%20Wellbeing%20in%20Education%20Framework%20%28final%20version%29.PDF> – p13

¹¹ <https://www.niccy.org/restraintandseclusion>

Schools have recently received the opportunity to participate in the Healthy Happy Minds Therapeutic and Counselling Service Pilot but their efforts to avail of the services in a meaningful and planned manner which will have the greatest impact have been frustrated by the launch of the pilot in November 2021 and the need to spend the budget allocation by March 2022. The lack of alignment between the school year and the financial year has long been an issue for schools in managing their budgets effectively to best support pupils but it has been further compounded in recent times as a result of the somewhat piecemeal nature of different funded projects (intended to mitigate the detrimental impact of the pandemic on children and young people's learning and wellbeing). Healthy Happy Minds is very much welcomed by controlled schools but there are concerns about the ready availability of therapists and counsellors. In developing such programmes it is critical to consider at the outset if there are sufficient appropriately qualified therapists and counsellors in the system to deliver on such an ambitious programme. These programmes have the potential to have a very positive impact on the wellbeing of children and young people and therefore any barriers to full participation need to be considered and remedied and continued funding of such programmes secured following an evaluation of the key learning and outcomes. CSSC understands that the pilot will be subject to an independent evaluation to determine the appropriateness of these interventions for primary schools going forward, subject to funding. It is potentially in developing more long-term programmes that there will be greatest impact and CSSC welcomes the Delivery Plans' intention to enhance the Regional Integrated Support for Education (RISE) Team Support and a new Child and Adolescent Mental Health Services (CAMHS) Emotional Wellbeing in Schools service. CSSC is however, aware of concerns about the criteria to access the support of CAMHS and the RISE teams. Access at post-primary to RISE would also support the transition of children with special educational needs to post-primary education. CSSC also welcomes the development of the Education Authority's Youth Service Resilience Education Assisting Change to Happen (REACH) programme and the delivery of CCEA's Wellbeing Hub.

Conclusion

CSSC welcomes the CYPS Initial 3-Year Delivery Plan and the proposed actions which have the potential to support children and young people's wellbeing across eight key outcome areas. CSSC endorses the rights based approach to developing these key actions and understands that identifying and working with partners will be central to the ongoing development of the CYPS and the range of actions proposed.

CSSC recommends that in the development of any actions which would further support children and young people's wellbeing that the Department continues to actively engage the views of children and young people and also those who work with them to ensure that those actions address the most urgent priorities.

The Delivery Plan outlines several key actions which CSSC believes must be progressed urgently and would comment that progressing those actions which seek to improve the experience of children and young people with Special Educational Needs can no longer be delayed. CSSC would also contend that in an increasingly more complex world an investment in developing support for children and young people's mental health and

emotional wellbeing is critical and has the potential to actively support children and young people's ability to learn and achieve.

CSSC's ongoing engagement with controlled schools has informed this response. CSSC is willing to discuss its response to this consultation and would refer the Department to CSSC responses to a number of public consultations which have addressed many of the key issues identified as areas of greatest focus in the CYPs Delivery Plan.

CSSC consultation responses: -

CSSC initial response to Independent Review of Education

<https://www.csscni.org.uk/sites/default/files/202201/Final%20Independent%20Review%20of%20Education%20CSSC%20Response.pdf>

CSSC response to DE consultation on statutory admissions criteria for pre-school

<https://www.csscni.org.uk/publications/cssc-response-de-consultation-pre-school-education-review-of-statutory-admissions>

CSSC response to Draft Area Planning Framework for Special Schools

<https://www.csscni.org.uk/publications/cssc-response-to-education-authority-draft-special-schools-area-planning-framework>

CSSC response to draft framework for specialist provision in mainstream schools

<https://www.csscni.org.uk/publications/cssc-response-to-education-authority-draft-framework-for-specialist-provision-in>

CSSC response to DE consultation on Draft SEN Regulations

<https://www.csscni.org.uk/publications/cssc-response-to-department-of-education-consultation-on-draft-sen-regulations>

CSSC response to DE Consultation on new Code of Practice

<https://www.csscni.org.uk/publications/cssc-response-to-department-of-education-consultation-on-draft-sen-code-of-practice>

CSSC response to the Expert Panel on Educational Underachievement

<https://www.csscni.org.uk/publications/educational-underachievement-panel-response>

CSSC response to DE consultation on support for Newcomers

<https://www.csscni.org.uk/publications/cssc-response-supporting-newcomer-pupils>