



**Response of the Ulster Teachers' Union
on the DRAFT SPECIAL EDUCATIONAL NEEDS (SEN) CODE OF
PRACTICE**

The Ulster Teachers' Union (UTU) welcomes the opportunity to respond to the Consultation on the Draft Framework for Specialist Provision in Mainstream Schools. The UTU represents approximately 6,500 members of the teaching profession including Principals, Vice-Principals, Teachers and Trainee Teachers. UTU members are employed across all the sectors in nursery, primary, post-primary and special schools and support service.

1. What is your name?

Ulster Teachers' Union.

2. Are you responding:

on behalf of an organisation/company

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Ulster Teachers' Union

3. Do you agree that the responsibilities of the Learning Support Co-ordinator (LSC) are clearly set out in the SEN Code?

The Ulster Teachers' Union have concerns regarding the responsibilities of being eligible for the role of Learning Support Co-ordinators as defined in the draft. It is noted that

- 2.47 The LSC must have at least three years' full time equivalent experience of teaching children with SEN (in the case of a LSC working in a special school this would include one year's full time equivalent experience of working in a special school).

It is our view that by citing experience by time is inappropriate. Rather the experience should be defined by

the level of expertise and ability to fulfil the duties. In many schools there is already a reluctance to undertake this burdensome role due to lack of training and lack of time to fulfil the necessary duties. By citing just three years this is in an attempt to make more staff eligible for the role rather than considering the suitability to undertake the role. Expertise, interest and experience are the criteria that are essential for this role. We also note that many small schools have staff holding this role with no remuneration or time. Also some teaching principals have this duty on top of leadership, management and curricular development.

It is noted that

- 2.48 The Board of Governors of both mainstream and special schools must ensure that the teacher designated as the school's LSC receives the necessary ongoing training and sufficient time to conduct the role effectively.

The necessary, adequate, and timely training must be guaranteed and embedded across all schools. Likewise,

time must be set aside for both training, upskilling and allowing the Learning Support Co-ordinator to fulfil their duties. The Ulster Teachers' Union would suggest that newly appointed LSCs receive training delivered from EA Level within 8 weeks of appointment.

There are also periods of the academic year where LSCs would need a substantial amount of time to enable paperwork to be completed and to meet psychologists and parents. Setting out their responsibilities must be met by a commitment from all involved to allow the LSC to fulfil their obligations.

4. Where there is a concern that a child may have SEN, do you agree that the process to be followed by schools is clear in the SEN Code? (See Section 3, paragraphs beginning 3.28. Also see Flowcharts and Checklists in Annex 3 a) and b) (for nursery schools or classes), Annex 4 a) and b) (for primary settings) and Annex 5 a) and b) (for post-primary settings)).

The process described in the Draft Code appears to be sensible and we agree with what has been proposed.

However, we have grave concerns and believe the “system” at Educational Authority level does not have capacity to deliver what is proposed.

5. Where a child is at Stage 1 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code? (See Section 3, paragraphs beginning 3.38. Also see Flowcharts and Checklists in Annex 3 c) and d) (for nursery schools or classes), Annex 4 c) and d) (for primary settings) and Annex 5 c) and d) (for post-primary settings).

We would agree that from the Draft consultation what is proposed at stage 1 of the special educational provision is clear.

6. Where a child is at Stage 2 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code? (See Section 3, paragraphs beginning 3.45. Also see Flowcharts and Checklists in Annex 3 e) and f) (for nursery schools or classes), Annex 4 e) and f) (for primary settings) and Annex 5 e) and f) (for post-primary settings).

We would agree that from the Draft consultation what is proposed at stage 2 of the special educational provision is clear.

7. Where a child is at Stage 3 of special educational provision, do you agree that the process to be followed by schools is clear in the SEN Code? (See Section 3, paragraphs beginning 3.55. Also see Flowcharts and Checklists in Annex 3 g) (for nursery schools or classes), Annex 4 g) (for primary settings) and Annex 5 g) (for post-primary settings).

We would agree that from the Draft consultation what is proposed at stage 3 of the special educational provision is clear.

However, we have grave concerns and believe the “system” at Educational Authority level does not have capacity to deliver support which is purposeful for the pupil and school that is proposed. Resourcing, funding and personnel will be necessary for this to be implemented.

8. Do you agree with the proposed content of the Personal Learning Plan (PLP)?

Having the PLP proposed will certainly help record the information in a clear and defined manner. This will also mean that if a pupil transfers to a new school setting the information presented can clearly show what has been progressed. We would wish to note that having a detailed PLP does not necessary ensure a pupils' engagement.

We would have a concern that SIMS will not be able to fulfil the needs that have been laid out in these examples.

We certainly hope that when this is rolled out it is fully operational, and training has been provided for those using the SIMS in schools.

We also have concerns that the PLP is too detailed and the bureaucracy is unnecessary admin. There are much simpler examples of scaffolding that are being used effectively in schools which can secure improvement learning. **The** PLP should not be creating additional paperwork, which we feel in this format it is creating. The PLP document should not add to the LSC's workload and

the document should have a standard format which ties into all agencies that may be having an input with the child. The UTU also have a concern that the PLP suggested may become a standard for ETI to refer to when looking at SEN in the classroom. This should not be the case. Rather the PLP should demonstrate the actions that are ongoing in supporting the child.

The completion of the PLP could be aided by having software or apps and linking in with SIMS which has dropdown menus already available with the majority of statements required to speed up completion of the paperwork. Very often from experience PLPs will say the same thing across agencies and it is time that we worked smarter in using technology to speed up efficiency rather than create unnecessary paperwork.

9. Once a child with a Statement reaches the age of 14, do you agree that the school process for the completion of the first transition plan is clear?

The procedure involved in the preparation of the first 'transition plan' for a child with a 'Statement of

Educational Needs' after their 14th birthday has been clearly laid out in the draft proposal.

10. Do you have any other comments you wish to make on the draft SEN Code?

The Ulster Teachers' Union would have concerns regarding the workload for teachers, especially the Learning Support Co-ordinator to fulfil everything that will be expected of them. We also have concerns over the resourcing and lack of capacity at EA level to fulfil their legal duties. Due to this we would also have concerns around accountability, and it is our feeling that much of this will be directed back to school level instead of the EA. At this time, we also know that in some school settings it is difficult to get a member of staff to be SENCo where time and remuneration may be of a minimum. When this happens, the duties fall back on the principal, indeed very often a teaching principal. There are great concerns that the paperwork now necessary will create extra burdens on the LSC. The focus of the SEN Code should be on meeting and supporting the needs of the child and not in creating bureaucracy and paperwork.

need to focus on the children and meeting their needs and supporting them. Likewise, the extra paperwork for the class teacher is not sustainable. We would much rather have teachers who are trained upskilled and can have continued professional development to ensure children are taught.

It should also be noted that we have concerns where a school setting may have a Learning Support unit attached that it is not clear who will be responsible. Often the children in these units have one member of staff with a SENCo overseeing the PLP. This should be clarified.

Likewise where children may be receiving outreach such as literacy it needs to be clear who co-ordinates the PLP and that it should be accessible to everyone.

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