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RE: Draft guidelines on the use of reduced timetables/reduced day in schools

Dear Ministers,

The National Advisory Council welcomes the opportunity to comment on the draft guidelines on the use of reduced timetables in schools. At present there is no system in place to track or monitor the use of a reduced school timetable and as such there is no data as to the frequency or why they are used by schools. The use of reduced timetables is a form of school exclusion and its use needs to be closely monitored to ensure that the rights of all children to an education are upheld.

Goal 2.4 in *Better Outcomes, Brighter Futures* commits to: ...implement strategies to improve school engagement and reduce incidences of suspensions and expulsions and early school-leaving through engaging parents in schooling, strengthening transitions, promoting different styles of learning to better engage boys, and fostering inclusive school environments where all pupils flourish, irrespective of social and ethnic background or disability.

The Council welcomes the development of guidelines for schools in relation to recording and notification of reduced timetables. The Council also welcomes key stated principles for example, that: "Reduced timetable/reduced day is never used as a sanction; offered as an alternative to a sanction, or used as a behavioural management tool; it should be applied proportionately and should last only as long as is necessary to facilitate a return to school on a full-time basis."

Our observations centre on three considerations:

1. Circumstances where a reduced timetable might be used

The draft Guidelines clearly state that a reduced timetable should only be put in place in exceptional circumstances and never be used as a sanction. An example is given in the guidelines of facilitating the return to school where a child has been absent for a medical or mental health related condition. However, the term exceptional circumstances is not defined in the guidelines. When setting out the key requirements for the use of a reduced timetable the guidelines also set out that there must be a clear evidence-based reason for considering this as the appropriate intervention. The draft guidelines do not provide any guidance as to what constitutes exceptional circumstances and/ or what evidence-based reasons are recommended in making decisions about the appropriate use of a reduced timetable in light of these exceptional circumstances. This could lead to inconsistency in the use of reduced timetables from one school to

another. For clarity and consistency the guidelines could provide examples here and what evidence-based reasons are needed to place a child on a reduced timetable.

The Council welcomes that schools must now notify the Education Welfare Service of the placement of a student on a reduced timetable. However we recommend that the form used for this purpose adequately captures the rationale being used for the reduction in time at school, in addition to the evidence base for the decision. This would contribute to greater clarity for all concerned, in addition to ensuring consistency of practice in the use of reduced timetables across schools.

the notification form that schools will be obliged to send to the Education Welfare Service does not adequately capture the rationale for placing a student on a reduced timetable or capture what evidence this decision is based on. The form currently has three boxes; 'medical', 'compassionate' or in 'school plan'. The latter in particular does not provide detail on why a student has been placed on a reduced timetable. The notification form could capture more explicitly the reason why a child has been placed on a reduced timetable and the evidence based for this.

2. Prevention and early intervention and access to support services

The draft guidelines provide guidance on how to document and record reduced timetables. However, as currently stated they do not define what steps a school should go through prior to making that decision. The Council is strongly of the view that prevention and early intervention is of critical importance when providing services in the best interests of children. To assist schools and encourage the use of reduced timetables as an exceptional measure only, we suggest that the draft guidelines include specification of recommended steps in advance of any reduced timetable being put in place. These steps could include conducting a needs assessment of the student, developing a learner plan and seeking interventions from the National Educational Psychological Service, Child and Adolescent Mental Health Services and Education Welfare Services.

3. Review

The Council welcomes requirements regarding a review following a specified period of time in relation to the use of a reduced timetable (page 4.) To ensure consistency in approach, we suggest that more detail is provided on that review process.

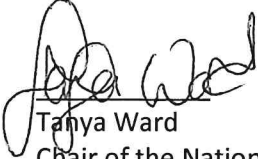
4. Information and support for parents and children

It is welcome that the draft guidelines place an emphasis on securing parental agreement prior to placing a child on a reduced timetable. It is also welcome that the views of the child are also to be heard in the process. In order to ensure effective consultation, it is recommended that schools ensure parents are fully informed about all aspects of the process, of their rights to appeal under Section 29 of the Education Act (1998) and of the support services that are available to parents. The Council also recommends that under Tusla's functions, information is provided on the Meitheal process which parents might want to benefit from.

Ministers, it is paramount that the guidelines on the use of reduced timetables respect all children's right to access education and recognize the best interests and needs of the individual child in each circumstance. It is welcome that a new notification system will be put in place so that the use of reduced timetables can be monitored. Consideration should be given to an annual report being published detailing the number of children being placed on a reduced timetable and the reasons why. This would help identify current patterns as well as any inconsistencies which may exist in the use of reduced timetables across schools. It would also highlight the supports are needed for students, parents, teachers and schools.

Lastly, Ministers you could consider the Education Welfare Officers playing a more proactive role early on in the process before a child is put on reduced hours. In addition, the resourcing of the Education Welfare service and support services for schools will be critical to ensure that schools can re-integrate children as soon as possible. Ensuring that school staff receive trauma-informed training and supports around behavioural management is also very important.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tanja Ward', written over a horizontal line.

Tanja Ward

Chair of the National Advisory Council for Children and Young People