The General Synod Board of Education (Republic of Ireland) of the Church of Ireland

Submission to the Special Committee of the Oireachtas

Regarding the re-opening of primary schools during the (2020) Covid-19 pandemic.

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The Board welcomes this invitation and opportunity to input into your deliberations regarding the reopening of schools in the context of the Covid 19 pandemic.

The following submission contains observations on the following areas:

- Finance and Funding
- Cleaning and Hygiene in schools
- Delivering Teaching and Learning in the Classroom
- Importance of Boarding/Residential Facilities
- Impact on Pupils with Special Educational Needs
- Impact on individuals categorised as High Risk and Very High Risk regarding contracting Covid 19
- Legal and Regulatory considerations
- Broadband and Connectivity
Introductory remarks

The General Synod Board of Education (Republic of Ireland) (‘the Board’) welcomes this opportunity to contribute to the deliberations of the Special Committee of the Oireachtas on the response of the State to the Covid 19 pandemic. The Board is the recognised management body for primary schools under the patronage of the Church of Ireland and other Protestant denominations and is composed of representation from school leaders at primary and second level and the patrons of the Church of Ireland and observers from the other Protestant denominations. While the Board has a policy role at both primary and second level, we make this submission with reference to primary level.

Preliminary remarks

In May, the Board made a detailed submission to the Department of Education and Skills (DES) regarding the challenges schools will face in reopening during the Covid 19 pandemic and we include that submission for the information of the Committee. Our comments in this document should be read in conjunction with that submission to the DES. We do not intend therefore to restate all the issues set out in our submission to the DES or those challenges identified in the recently published (12th June 2020) briefing documents to Government. We are conscious also that members of the Committee will be aware of the challenges involved through their own contact with schools in their constituencies.

We note that it is the stated intention of the Minister and the DES that all schools should reopen for classroom based teaching and learning for the coming school year. The Minister has also noted that blended learning, in addition to classroom based delivery, may form part of the delivery of the curriculum for some time to come (particularly for those students in the high risk categories).

We welcome this opportunity to highlight broader matters which we feel should be brought to the attention of the Committee:

Funding and Finance

State financial support to schools is through the capitation grant which is an amount per pupil, granted by the Oireachtas and administered by the DES. In
September this amounted to €179 per pupil and was increased in Budget 2020 to €183 per pupil (with the increased amount payable from the 1st September 2020). The outbreak of Covid 19 was entirely unforeseen and schools could not have been expected to have budgeted for the pandemic. Normal school budgeting would allow for some contingency towards unforeseeable costs that might arise in the school year but not on the scale of catering for a virus pandemic. Reopening schools in the unique circumstances of September 2020 will inevitably demand extensive additional expenditure on Personal Protection Equipment (PPE) equipment, the necessity of enhanced cleaning practices, additional IT to facilitate distance/online learning both in terms of equipment and in terms of broadband upgrade.

In this connection, we note that €14 million in additional funding has been provided to Early Childhood providers. Primary and post-primary schools will also require additional funding.

**Key point:**

The reopening of schools will give rise to increased costs and we suggest that this matter should be raised with the Minister for Finance (what about DPER), with a view to putting in place additional funding for schools to fund costs associated with reopening and the ongoing operations of schools.

**A clean school environment**

The reopening and the sustaining of the provision of teaching in schools during a pandemic where anti-virus prophylaxis is not available, poses a major challenge in terms of anti-viral cleaning and the facilitation of appropriate washing and hand hygiene and there would be a concern that existing school cleaning practices are not sufficient. Indeed, many schools do not have hot water available in pupil toilets to allow for handwashing with soap.

Schools have general operative staff members who carry out normal routine cleaning tasks to ensure that schools are maintained to an acceptable standard of cleanliness, for normal circumstances. However, Covid 19 creates circumstances where ordinary levels of cleanliness are insufficient. The cleaning of an area or environment that could host the Covid 19 virus is a specialist job that is beyond the responsibility or contractual obligations of existing cleaning staff. It is unfair and potentially risky from a health perspective to place the responsibility for specialist cleaning solely on the cleaners currently employed by the schools.
We note that the practice in other countries (specifically France) has been to engage separate cleaning crews to cleanse and sanitise schools at the end of each school day. Cleaning crews have specialist training and their purpose is not to engage in routine cleaning (which remains the job of the school cleaner) but to sanitise the whole school against the Covid 19 virus on daily basis.

We would suggest that putting in place Covid 19 cleaning crews is a practical way that the State could both assist schools and seek to ensure that the transmission and reproduction of the virus is minimised in the school community.

**Key Point:**

**Specialist cleaning of schools has now become a massive issue well beyond the level of routine cleaning. This needs to be recognised, funded, managed and resourced.**

**Delivering Teaching and Learning**

As noted by the Minister recently and in the Board’s submission last May, the 2 metre distance rule creates major logistical difficulties in terms of accommodating pupils in school. The majority of Church of Ireland/Protestant primary schools are small schools (often four teachers or less) in smaller buildings without the resource of a large sports hall or other large indoor space.

A key characteristic of Church of Ireland schools is the tradition of the weekly (and sometimes daily) school assembly. It is difficult to see how an assembly could be convened with a 2 metre distance between pupils as most of the schools would not have the indoor space to facilitate such a gathering.

Ensuring social distancing in schools would mean either a ‘split’ school day or classes attending on alternate days. Neither of these options is a practical solution as it would oblige parents/guardians to provide full time supervision at home. The Board would like to note that it should not be taken for granted that one parent is a ‘stay at home’ parent or that parents can work from home or that employers will sanction ongoing working from home.

In relation to accessing schools, the majority of Church of Ireland schools outside of the Dublin area depend upon school bus transport to convey pupils from home to school. Should schools be advised to operate on a ‘shift’ basis, the logistics of supplying school bus transport would become impractical.
Similarly, the logistical challenge of supplying extra school buses if social distancing is required on buses will also need to be considered.

**Key Point:**

It is clear that the return to school on a full day and full week basis can only occur if the current social distancing requirements are reduced.

The provision of school transport with social distancing on board school buses for children in rural areas would present a very difficult logistical and practical challenge.

**Boarding and Residential Facilities in Second Level Schools**

The focus of this submission concerns how primary schools will reopen during the Covid 19 pandemic. However, The Board wishes to highlight that the Church of Ireland community relies on our second level boarding schools to provide families and students with their constitutional right to attend a school of their own ethos. For many members of the Church of Ireland or other Protestant-denominations, living in rural Ireland, boarding is the only opportunity for this to be achieved. Boarding schools will require particular assistance to meet the advice of the National Health Emergency Team (NPHET).

On behalf of the Church of Ireland community of the Republic of Ireland we would seek the commitment of this Government in providing the staffing and infrastructure necessary for minority faith schools to provide education to their boarding students so that they are not disadvantaged during the COVID-19 health emergency.

**Key Point:**

Boarding facilities at second level are essential to the Church of Ireland and Protestant community. Support and assistance will be a necessity to ensure such facilities can reopen as safely as possible.

**Impact on Pupils with Special Educational Needs**

The Board is concerned with the impact that the non-classroom based delivery of teaching and learning is having on pupils with special educational needs. Pupils who require assistance, pupils who experience anxiety, or pupils for whom a change in routine is difficult are especially affected by the changes to the experience of school that Covid 19 has brought about. The Board is
concerned at how these students will engage with a mixture of classroom and online learning. The Board is also concerned that proper supports will continue to be provided to pupils with SEN. There is a concern that social distancing will make the job of the Special Needs Assistant (SNA) very difficult to carry out. Specialist advice will be needed by schools in this regard.

**High Risk and Very High Risk Pupils**

Many students are in a high risk or very high risk health category and it is not appropriate, nor should it be expected, that those students return to class-based school. Schools will be advised to identify such pupils and to put in place a long-term learning plan which envisages distance learning as the medium of engagement for those pupils until such time as a vaccine or a prophylaxis treatment is available (or where their parents/guardians are content for them to return to the classroom).

Teachers, SNA’s and other school staff are also likely to be in high risk and very high risk categories. Staff in such categories may not be in a position to return to an interactive social environment such as a school. This may give rise to a practical difficulty for some schools in circumstances where there is an existing shortage of teacher supply. The Committee may be unable to provide a solution to such a dilemma, the potential unavailability of teaching staff for classroom based teaching is a significant factor when considering the challenges faced in seeking to reopen schools.

**Key Point:**

**Pupils in the High Risk and Very High Risk categories (as defined by the HSE) cannot be expected or compelled to attend school. Distance learning will still be required for such pupils.**

**School staff in High Risk and Very High Risk categories (as defined by the HSE) will not be in a position to return to classroom teaching. This will create a staffing problem in schools. Will substitute teachers be sanctioned in such circumstances? Will schools be able to fill these positions if they are sanctioned.**

**Legal and Regulatory considerations**

There is a concern in relation to the potential exposure for a Board of Management in respect of a Covid 19 personal injury claim as a result of the reopening of the school. Boards of Management are potentially exposed in this
regard as, despite all precautions being in place and the strongest cleaning regimes, it is impossible to ensure that no person in the school will contract the Covid 19 virus. We note that a State Indemnity has already been given by the DES in respect of SNA staff who were reassigned from closed classrooms to work in the community. The Special Committee might give consideration to putting in place a similar indemnity for Boards of Management with respect to the contracting of Covid 19 by anyone within the school environment.

Should such an indemnity not be in place Boards of Management will be forced to rely on their own insurances (provided the insurance companies are agreeable to cover Covid 19 claims.) A significant successful claim would drive up the cost of the insurance premium for the school which, in turn, would negate the value of the increase in capitation that was granted by the Government to schools in Budget 2020.

As already mentioned, parents of pupils in the high risk and very high risk categories may well be unwilling to send their child back to the classroom environment. The Committee will be aware that, in normal circumstances, attendance at school is compulsory and is regulated by the provisions of Education (Welfare) Act 2000. It is understood that Tusla are taking a broad and ‘light touch’ interpretation of the Act during the current Covid 19 pandemic and this common sense approach is to be welcomed and commended. It is likely however that many parents, for various reasons, will be reluctant to send their children back to school in the current circumstances. Under section 14 of the Education (Welfare) Act, absences of more than 20 days have to be reported to the Liaison officer with Tusla with a view to ensuring the child is either enrolled in school or ‘home schooled’. The Act does not provide for a ‘middle ground’. We suggest that the Committee might give this possible anomaly in the legislation priority consideration (especially given that the Covid 19 pandemic is a reality for the foreseeable future).

Key Point:

Boards of Management will have a concern that in reopening the school they are also opening themselves up to increased liability. Boards of Management need reassurances and an indemnity in respect of litigation arising out of a Covid 19 claim.

It is foreseeable that a significant number of pupils will be unable to attend school due to underlying health conditions or parents/guardians may be
uncomfortable with their child being in school (for various reasons). Legislation on attendance should be amended to recognise this reality.

**Broadband and Connectivity**

The delivery of teaching and learning outside the classroom, and the use of distance learning and various IT platforms, depends on the availability of broadband. There is an assumption that every child, while at home, has access to a device and broadband. This is not the reality for many. The Board greatly welcomed the initiative of the Minister for Education and Skills to make additional funding available to schools for the purchase of additional ICT equipment to address this issue during the ‘emergency’ Covid 19 closure. Nonetheless, pupils and teachers who live in rural Ireland are hampered by either the unavailability of broadband or poor/unreliable connectivity. This is a significant limiting factor on the quality and consistency of the provision of education across the country. This creates an unfairness in the delivery of education.

In addition, it remains the case that post-primary schools that are fee-charging in line with the agreement with the Government of 1968 are deemed ineligible for ICT grants from the DES.

**Key point: Broadband and quality ICT connectivity is not available to all pupils and teachers. Distance/online based teaching and learning cannot be guaranteed to be available to all equally or consistently.**

**Conclusion**

The Board welcomes the attention of the Special Committee to the issue of the reopening of schools during the Covid 19 pandemic. The logistical challenges involved are complex and there are no solutions that will ensure schools will be free of the Covid 19 virus when schools become operational again. Neither can we ensure categorically that the virus will not be contracted by a pupil or member of school staff. This is the greatest risk and greatest challenge: facing the likely risk of transmitting the virus to a staff member and/or pupil but balancing that with the educational, social, emotional necessity for children to get back to school.

The Board supports the aspiration to reopen schools fully in September, subject to the final decision being determined on scientific grounds. The DES is currently compiling detailed scientifically informed guidance for schools in
respect of Covid 19. We look forward to working towards reopening our schools based on that guidance. We also look forward to receiving an assessment of whether or not schools should reopen from the HSE nearer the beginning of the new school year.

Schools are anxious to ensure that they reopen and operate in the safest possible way and schools need tangible support in this task. In that regard, we are of the view that a schools Covid 19 advisory service should be established by the HSE, with expert advice and support available to schools (on a regional basis). The provision of a book of guidelines alone is insufficient.

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