



**Comhairle na Gaelscolaíochta Submission to
Draft Strategic Area Plan 2022-27: Planning for Sustainable
Provision**

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Introduction – About us

Comhairle na Gaelscolaíochta was set up in 2000 by the Department of Education with the following aims:

1. To promote, facilitate and encourage Irish-medium Education and Irish-medium schools;
2. To do this in a planned, educationally efficient and cost-effective way.

Our vision is the establishment of a network of vibrant, viable Irish-medium schools, from preschool to post-primary, providing excellence in education, at the heart of developing Irish Language communities.

Our mission is to contribute to the development of vibrant Irish-speaking communities by ensuring access to high quality Irish-medium education to those who desire it.

What we do:

1. Assist parents who wish to establish Irish-medium provision in their area;
2. Plan for the creation of new Irish-medium schools;
3. Promote standards of good practice in Irish-medium schools;
4. Co-ordinate the activities of all those involved in Irish-medium Education;
5. Represent the Irish-medium sector at all levels;
6. Promote Irish-medium Education to the Dept of Education, Education Authority, Council for Catholic Maintained Schools, CCEA and other bodies;
7. Provide advice, assistance and information in relation to Irish-medium Education to those who need it and to groups seeking to establish Irish-medium schools and units.

How we do this?

Comhairle na Gaelscolaíochta promotes Irish-medium Education in the community, encourages parents to establish Irish-medium provision, and endeavours to ensure children have access to Irish-medium Education at pre-school, primary and post-primary level.

Statutory Duty for Irish-medium Education

The Draft SAP states that managing authorities and sectoral bodies will seek to support Irish-medium (and Integrated education) by seeking to:

..identify, explore and bring forward proposals to encourage and facilitate both Irish Medium and Integrated education to provide sustainable education for an area. Both Comhairle na Gaelscolaíochta and the Northern Ireland Council for Integrated Education will provide guidance and direction on innovative sustainable provision, working with all education partners in achieving Area Planning solutions. (3.1.2.)

Comhairle na Gaelscolaíochta (CnaG) welcomes the opportunity to contribute to the development of the Draft SAP. CnaG currently enjoys representation at all levels of the Area Planning process, in a spirit of co-operation and collaboration with other managing authorities and sectoral support groups. We welcome the stated vision of the SAP that *‘all children will have access to a high-quality educational experience, through a broad and balanced curriculum that meets their needs, in educationally and financially viable schools, within a diverse system of education.’*

The Irish-medium sector celebrated its 50th year in 2021 and there are currently over 7,000 pupils in the sector, from pre-school to post primary; IME is currently the fastest-growing sector in Education locally. Significantly in the context of Area Planning and provision of SEN support, it is worth noting that:

- **Free School Meal (FSM) entitlement in Primary IME is 7% higher than in English-medium and is over 15% higher at Post-primary level.**
- **The percentage of children in the IM sector with Special Educational Needs is 21.9%, compared to 19.3% in the English-medium sector.**
- **Approximately 60% of school buildings in the IM sector are temporary / mobile.**

Being a small but growing sector inevitably means that IME often experiences friction within the realm of educational policy and particularly Area Planning, which was invariably designed to cater for a largely contracting school-age population, (which is also monolingual). The Area Planning process was originally conceived to examine the funding of the education system and in particular the strategic planning and organisation of the school estate. It was developed within a context of a falling school-going population and Bain

acknowledged that a significant part of this was about reducing the number of smaller schools within the context of falling enrolments to deliver larger, more cost-effective schools that could effectively deliver the curriculum. This has been the thrust of all subsequent Area Planning policies including the Sustainable Schools Policy and the Providing Pathways Policy which formed the framework for the current Area Planning Process.

Bain (2006) acknowledged the unique situation of the Irish-medium Sector and the need for a different approach to it as a growing sector. However, despite the review of Irish-medium Education, undertaken in 2008, few, if any, satisfactory Department of Education Policies have been developed to adequately address the needs and strategic development of the IME sector within the context of Area Planning and caselaw has been left to 'chip at the edges' in order to address the needs and aspirations of the IME sector.

So while CnaG is happy to participate fully in the Area Planning process, and to engage in the consultation process on the Draft SAP, **we strongly contend that many of the policies that inform the entire Area Planning process are not conducive to the development of the IM sector and may be in breach of the Statutory Duty to 'encourage and facilitate the development of Irish-medium education.'**

The Sustainable Schools Policy and Proposals in The Sustainability Baseline Report

Allowing for the comparatively small size of the IME cohort and the fact that it is a relatively new and emerging sector, in comparison with the wider, long-established EM education sector, any changes to the Sustainable Schools Policy criteria, which increase its thresholds, would be felt disproportionately within IME.

By raising the threshold for establishment and for achieving operational and capital viability, it is effectively placing an obstacle to the development of IME within these areas. CnaG advises the Department that an urban area of 5,000 people is not equivalent when considering IME against English-medium sectors and that the threshold should remain in all but the largest conurbations of Derry and Belfast. **To implement the policy in its current form is creating an additional obstacle to the establishment of new IME provision and places IME schools already established at a distinct disadvantage in terms of demonstrating their operational and capital sustainability.**

The practical consequences of this policy would mean that it would make it even more difficult to establish IME provision in the areas where there is currently none and limit the availability of IME for parents. It would also make it more difficult for schools to secure their operational and capital viability placing them at a significant disadvantage to the EM sectors.

The Draft 'Sustainability Baseline Report' suggests that the impact of the proposed changes will be minimal;

'It should be noted however, that the analysis undertaken in 2019 to support the adoption of the NISRA definition has identified minimal overall change in the numbers of schools that would find themselves falling below existing enrolment thresholds - seven primary schools reclassified from rural to urban would change from being above to below the minimum enrolment.'

Comhairle na Gaelscolaíochta estimates that 4 out of 35 (11%) Irish-medium primary schools would be impacted by the proposed changes; the impact upon and number of IM schools re-categorised as below the threshold will be disproportionate to the size of the IM sector within education as a whole. If, for example a similar measure was to be applied to the English-medium sectors, approximately 86 schools would be affected.

Irish-medium schools that had struggled for years to reach sustainability would be once again left to deal with the uncertainties and vulnerabilities that are associated with being classified as 'unsustainable'. As well as representing a major setback to the school community, affected schools would face challenges relating to accessing suitable accommodation via the Department of Education's capital funding scheme.

Developing Schools

In recent years, Comhairle na Gaelscolaíochta's focus has been on consolidating the enrolment numbers and building the sustainability of existing schools, many of which are developing schools. This will continue to be our focus in the time ahead. This Developing Schools policy is of particular relevance to our sector as the reality is that virtually all developing schools across the north are Irish-medium and going forward the likelihood is that any new provision will come from the IM sector.

If changes recommended in *Developing Schools* were implemented fully in relation to developing and newly established schools, **it is our contention that it would have a disproportionately adverse impact on the IM sector** and it is the view of Comhairle na Gaelscolaíochta that the policy would create a conflict with the Department's statutory duty 'to encourage and facilitate the development of Irish-medium education.'

The following data analysis gives an overview of the experience of the IM sector and would indicate the need for a longer period of time for an IM school to move from being a 'developing school' to becoming fully established. As the table below indicates, more than 70% of IM primary schools would not have realised that 10 Year goal.

Percentage of IM Primaries surpassing Enrolment Threshold		
Sustainable within 7 yrs	1 School	4%
Sustainable within 10 yrs	8 Schools	29%
Sustainable within 15yrs	11 Schools	39%
Sustainable with 25yrs	15 Schools	54%

It is vital to build parental confidence in a new or developing IM school and the IM sector has a range of constraining factors that present a significant 'drag' in schools being able to build sustainable enrolments in the short term. One of the main drag factors is the level of capital investment in new and developing provision where current practice delivers only the minimum classroom accommodation for the school to function. New and developing schools rarely have the range of facilities, the quality of accommodation or the normal ancillary accommodation that almost all competing schools in their hinterland have. The result of this is that physical accommodation and facilities in most new or developing IM schools compare very unfavourably to adjacent EM provision. **Indeed, currently there is only one purpose-built IM school outside of Belfast.**

The current position in relation to capital investment effectively creates a catch-22 situation, whereby schools cannot attract enough pupils to secure capital funding for proper facilities and because they do not have the proper facilities, only the most determined parents who are prepared to accept sub-standard facilities in order to have their children educated in Irish send their children to the school. It can often take 10-20 years to slowly build enrolment to break out of this cycle.

Allowing for the legacy of the IM sector's organic, community-led development which came about in the absence of strategic planning, there nevertheless remains an inability on the part of DE to appreciate that these circumstances have hampered progression to maturity for most IM schools. There is more than one type of education provision available to the wider community, and Irish-medium education has the additional challenge of linguistic difference from that of the traditional education sector or the language that is spoken at home for the majority of parents. This challenge is compounded by it being a minority language struggling to provide an adequate number of trained teachers, diagnostic and teaching resources; another determining factor which parents have identified alongside the substandard accommodation for not choosing Irish-medium education for their children. The fact that the sector has grown significantly in spite of these challenges is a source of enormous encouragement and provides an indication of what is possible moving forward with more bespoke support mechanisms in place.

Developing Schools & IM Post-primary Education

The thresholds for setting up new post-primary provision are virtually impossible to achieve within the context of IME and since IM post-primary sector is the most undeveloped sector across the north, we feel that this is unfairly and massively disproportionately targeted at preventing the growth of the IM post-primary sector.

The growth in the IM primary sector that has taken place over the last 10 years means that there is an expectation, all other things being equal, of the post-primary sector growing by 75%+ over the coming 5-7 years. There is currently under-provision of IM post-primary places with major geographical gaps in provision and restrictions in available places in IM streams in EM post-primary schools. There is therefore a need to implement a strategy for the expansion of IM post-primary provision that is appropriate to the sector.

There is no way that such an expansion strategy could be delivered within the parameters of the Developing Schools policy. This policy would have prevented the setting up of Gaelcholáiste Dhoire and, in view of the DE advice to the Minister in total opposition to his decision to approve Gaelcholáiste Dhoire, there is a perception to many in the sector that this policy has been formulated as a direct reaction to the Ministerial decision to approve the development Proposal for Gaelcholáiste Dhoire.

We feel strongly that this policy runs directly counter to the Department's Statutory Duty and that it should not apply to the IM sector. We feel strongly that the Department and the Area Planning team need to engage with the sector and Comhairle na Gaelscolaíochta to develop a strategy to guide the expansion of provision within the IM post-primary sector through growing existing schools, setting up new IM schools & satellite provision and the setting up of new schools in areas where existing streams have advised that they are not prepared to expand provision or to transform into free standing provision with no restriction on its growth.

Impact of appropriate infrastructure and accommodation

Significantly, all IM providers that have enjoyed the benefit of appropriate permanent school buildings and an adequate infrastructure have increased their numbers and are progressing towards optimum enrolment, in all cases by at least 15% and in one case by 43% in the last 6 years.

The Irish medium sector does not have the benefit of a promotional budget to enable it to independently sell itself among the wider community and to enable it to compete alongside the English-medium sector. Therefore, allowing for the IM sector's experience and furthermore, its continued growth at all levels, **Comhairle na Gaelscolaíochta strongly recommends extending the timeframe to a minimum of 15 Years which would reflect the IM sector's average time of 13.6 years to achieve sustainability.**

Moreover, this period would facilitate two full cycles in a primary school and provide a reasonable timeframe to develop and establish a new school. Likewise, in relation to the post-primary sector, Gaelcholáiste Dhoire was established almost six years ago and whilst it achieved 50+ pupil-intake in its fifth year, the main growth in P7 IME pupils is not set to peak for at least a further 7 years. It is at this point the school should have an annual admissions number of 80+, based on its current rate of transfer from IME primary schools. Therefore, based on this most recent experience we would urge DE to reconsider those proposed enrolment numbers and the 10 Year timeframe for a new school in the IM post-primary sector also.

Comhairle na Gaelscolaíochta, as the sectoral support body for Irish-medium education, would be in a position to support those schools unable to achieve sustainability after 15 years, to put measures in place using the SSP key indicators to identify what actions are required and who can assist; ETI, EA, sectoral bodies etc, to support them moving towards full sustainability.

Conclusion:

IME, as a small but growing sector, cannot survive in a process that is driven by 'rationalisation' of the existing school estate, right-sizing, amalgamations and school closures. IME needs a parallel Area Planning structure that is cognisant of the infrastructure and resource needs of the fastest-growing sector in education, and in which there is acknowledgement of the deficiencies that exist currently in IME, for example; the prevalence of sub-standard accommodation, the absence of Learning Support Centres and the shortage of suitably qualified staff.

The impact of the policies that inform the Area Planning process could pose an existential threat to Irish-medium education, if a sufficient amount of flexibility for a small but burgeoning sector is not considered and that realistic growth projections for the sector are not taken into account. The Statutory Duty for Irish-medium education which the Strategic Area Plan references, is not a 'due regard' duty; rather it must have practical consequences (*DE v Colma McKee*). The Duty allows the Department of Education and its agencies to make decisions that benefit IME, not to give an unfair disadvantage over other sectors but to attempt to create a 'level playing field' for IME, where it can enjoy similar benefits to schools in other sectors, particularly regarding suitable accommodation, teaching and learning resources, provision of Learning Support Centres and adequate supply of teachers.