

LITERACY, NUMERACY AND DIGITAL
LITERACY STRATEGY CONSULTATION

RESPONSE FROM THE DYSLEXIA
ASSOCIATION OF IRELAND



The Dyslexia Association of Ireland is pleased to have the opportunity to respond to this [consultation](#) regarding the development of the successor strategy to the [National Strategy: Literacy and Numeracy for Learning and Life 2011-2020](#). In developing this response we have closely reviewed the 2011-2022 Strategy and also consulted the [2017 Interim Review](#) and the current [Discussion Paper](#) that has been circulated as part of this consultation.

In 2011 the Dyslexia Association of Ireland warmly welcomed the launch of the *National Strategy: Literacy and Numeracy for Learning and Life 2011-2020* and applauded the overall aim of raising standards in literacy and numeracy in early year, primary and post-primary settings by 2020. We welcomed the breadth covered in the component 'Pillars' of the strategy and specifically welcomed the focus of Pillar 5: 'Helping students with additional learning needs to achieve their potential.'

The high-level messaging around the 2017 Interim Review suggested that considerable progress had been made since the launch of the strategy in 2011. It was disappointing however that so little evidence was provided in the Review to demonstrate progress with Pillar 5, and that the five priorities identified for the remainder of the Strategy did not specifically highlight children with significant developmental difficulties as a key focus.

It is also a missed opportunity to not have had a formal and rigorous summative review of 2011-20 strategy, at its conclusion, as this might have supported the process and informed the development of a successor strategy. As the new strategy is being developed it is however welcome to see, within the Discussion Document, that one of the key factors underpinning the new strategy will be "Supporting Diverse Learners to Achieve their Potential".

We hope that the following observations and recommendations are helpful to the process of designing the new strategy. In addition to this submission, Dyslexia Association of Ireland would like to be considered for inclusion in subsequent consultation events including bilateral meetings and other stakeholder events that the Departments have indicated they will be undertaking with key stakeholders. This is vital to ensure that the views of the very significant cohort of students with dyslexia (at least 10% of the school population) are heard, and to ensure that the profile of dyslexia is appropriately prominent in the successor strategy.

Dyslexia Association of Ireland
February 2023

1. TEACHERS' PROFESSIONAL PRACTICE

With regards to Initial Teacher Education (ITE) the 2011-20 Strategy highlighted that “Several initial teacher education courses include modules on teaching students with additional educational needs. However, these modules are not available on all initial teacher education programmes and this gap needs to be addressed.” (p66). The related entry in the table of actions aims to “Ensure that all initial teacher education courses...include mandatory modules...to address the specific literacy and numeracy learning needs of students with special educational needs.” (p70).

At the end of the current Strategy it is not clear that all ITE training course do include sufficient mandatory training around additional educational needs or dyslexia. Where there *are* modules within programmes, these seem to be opt-in and/or are rather general in focus - without the specificity required to address the individual needs and approaches required for specific condition or diagnoses. In our 2021 Teacher Survey only 3% of teachers felt that their ITE adequately prepared them to address dyslexia in the classroom.

With regard to Continuing Professional Development (CPD) the 2011-20 Strategy Action plan sought to ensure that teachers “*had access*” to guidance and courses (both formal post-graduate course and less formal equivalents) (p70). However there was no aim to make access to such professional development a *requirement* for teachers, and this opt-in status therefore provided no assurance that young people were being taught by people who knew enough about how best to meet their needs. It is also not clear that currently available guidance documents (e.g. best practice guides for reading intervention programmes) are actually as rigorously evidence-based and up-to-date as they need to be.

RECOMMENDATIONS FOR THE NEW STRATEGY

- The new strategy should aim to establish minimum requirements for ITE Programmes with regard to a minimum number of hours of mandatory modules specifically on dyslexia identification and support, and on dyscalculia and maths difficulties
- The new strategy should aim to establish mandatory CPD requirements for all practicing teachers and school leaders around best practice regarding dyslexia identification and support, and consistent whole school policy and practice.
- The new strategy should aim to ensure that best practice guidance provided by the Government departments and agencies on supporting diverse learners (e.g. guides on targeted literacy programmes) are open to scrutiny from appropriate third level professional experts and relevant advocacy organisations, to ensure that they are in line with the best international evidence and research. Similarly evidence based guidance on dyscalculia and maths difficulties needs to be developed and regularly reviewed.
- The new strategy will need to link explicitly with the relevant regulatory frameworks around initial teacher education (Céim), newly qualified teachers (Droichead) and CPD (Cosán).
- The new strategy should aim to establish mandatory additional or enhanced qualification standards for all teachers working in Special Education Teaching (SET) roles, and make this explicit in updated regulations associated with the Teaching Council Act 2001 and the to-be-reviewed EPSEN Act 2004.

- The new strategy will aim to ensure that the Teaching Council and the Inspectorate build in scrutiny of the above enhanced requirements for professional training into existing quality assurance mechanisms, e.g. whole-school inspections, related school-led self-evaluations and evaluations of the consistency and quality of ITE curriculums in colleges of education.

2. IMPROVING THE CURRICULUM

The 2011-20 Plan discussed revising the learning outcomes of the curriculum, much of which at a Primary level has already been undertaken in the revision of the Primary Language Curriculum, and current planning around revising the wider curriculum. It is imperative however, within these processes, that the curriculum for the teaching of written language (reading and writing) is fully underpinned with *Science of Reading* research informed approaches for all languages, including English, Irish and modern foreign languages.

We need to acknowledge that diverse learners are in every classroom and we need to consider these learners as a core part of any strategy, with the recognition that it is the responsibility of *all* teachers to meet their needs. A universal design approach to teaching and learning, and assessment, should be fully integrated into the curriculum, so that diverse learners are fully included and planned for, and not considered yet again as a dislocated add-on to the ‘mainstream’.

In terms of the curriculum at Post-Primary Level, Senior Cycle and links to State Examinations, DAI has already made extensive submissions on this topic, which are attached here in the Appendix for reference.

RECOMMENDATIONS FOR THE NEW STRATEGY

- The new strategy should aim to emphasise the primacy of Science of Reading informed approaches to the teaching of reading and writing in all languages, including Irish, English and Modern Foreign Languages at all levels, and curricular guidance and resources should be reviewed and enhanced to ensure that they align with this.
- The new strategy should aim to promote a more balanced Leaving Certificate with urgent priority placed on reforming how students are assessed, and how reasonable accommodations are provided, that will more equitably allow students with diverse profiles to formally evidence their talents and abilities.
- Greater access to assistive technology at all levels should be a key focus of the new strategy, as this can enable better access to the curriculum and aligns with a UDL model of differentiated modes of learning and assessment.

3. IDENTIFICATION AND ASSESSMENT

The 2011-20 Plan placed an emphasis on the importance of timely assessment and highlighted the need to improve the skills of teachers in assessing, monitoring and recording literacy and numeracy outcomes for students with special educational needs. More specifically it aimed to “Ensure that schools prioritise the tracking, assessment and analysis of the achievement of students with special educational needs as part of the school’s self-evaluation and improvement process”(p70).

Whilst recognising that there are not sufficient mechanisms to assess progress against these aims, it is the experience of the Dyslexia Association of Ireland that we are still falling very short in this area, and it is still very possible that students with dyslexia can (for a host of inter-related reasons) go through the full primary and post-primary stages of school without dyslexia being identified or the needs arising from it being properly supported or accommodated.

RECOMMENDATIONS FOR THE NEW STRATEGY

- The new strategy should seek to establish the roll-out of standardised testing of phonological decoding and encoding in Senior Infants or First Class for any child that either parents or teachers are concerned about. This assessment would act to screen children who might be dyslexic at the earliest opportunity, to allow targeted intervention that has the best possible chance to succeed, and to avoid any negative impact on the confidence or self-esteem of the child.
- The strategy would seek to clarify that existing standardised tests of vocabulary and comprehension (Drumcondra/MICRA T) have clear roles within the assessment infrastructure, but are not sufficient to achieve the above aim of early identification of dyslexia.
- The strategy would seek to address the urgent unmet need for professional assessment of dyslexia provided by the State, without parents needing to depend on the private or charity sector for such assessments. In line with article 25 of the UNCRPD, the state should provide equitable access to assessment and intervention, recognising that this is a fundamental disability rights principle.

4. INVOLVEMENT OF PARENTS

The 2011-20 Strategy set out the need for schools to inform parents about ways to support their children's learning and how to understand reports about their child's progress. The associated action plan set an aim for teachers to "work collaboratively with one another and with parents in drawing up, implementing and reviewing focussed programmes in literacy and numeracy for pupils with learning needs." (p66).

It is very much the case that parents of dyslexic children are still not sufficiently included in the planning and review of their child's learning, and where this *is* the case, it is often as a result of parents needing to strongly advocate for this. Parents are also not sufficiently briefed on any additional testing done in school with their child; whether additional support is being put in place; the nature and pattern of that additional support; and how parents can support the additional help in school with support at home. There is also an associated lack of appropriate planning paperwork (e.g. School Support Plans) and review of same.

RECOMMENDATIONS FOR THE NEW STRATEGY

- The new strategy should set clear expectations as to how and when parents are consulted about the additional assessment and support provided in school to meet their children's needs.
- The new strategy should seek to involve the Inspectorate in quality assurance activities to ensure that appropriate levels of parental involvement are in place in schools, by evaluating

relevant record-keeping and surveying relevant parents as part of whole-school inspections and school-led self-evaluation processes.

- The strategy's focus in this regard should align with any move to place requirements around parental involvement on a statutory footing, which may arise as part of the current review of the EPSEN Act 2004.

5. IMPLEMENTATION OF THE NEW STRATEGY

It is disappointing that a formal review of the 2011-20 has not been transparently conducted ahead of the development of the successor strategy. The new strategy needs to establish clear accountability and quality assurance mechanisms to ensure its implementation is supported.

RECOMMENDATIONS FOR THE NEW STRATEGY

- Targets within the new strategy should set deadlines for *completion* of actions, rather than 'indicative dates' for *commencement* of actions, (e.g. "From 2013") as was the case in the 2011-20 Strategy. SMART targets should be set that can be measured by performance data, and by surveying the experience of teachers, parents and young people.
- The new strategy should be central to the scope of all school self-evaluations, school improvement plans and whole-school Inspections carried out by the Inspectorate, ensuring that literacy and numeracy are evaluated against the respective Pillars and actions of the new strategy that affords a more detailed consideration of the experiences and outcomes of those with additional educational needs in general, and dyslexia specifically (given that the primary needs of dyslexic students are literacy-based).
- Representatives from stakeholder organisations are invited to participate in steering groups pertaining to the respective relevant pillars of the new strategy, where they can contribute to appropriate scrutiny of the strategy's implementation.