

6 March 2006

Post Primary Support Team
Department of Education
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***NEW POST-PRIMARY ARRANGEMENTS
PROPOSALS FOR A DRAFT EDUCATION (NORTHERN IRELAND) ORDER***

Armagh City and District Council welcomes the opportunity to respond to the Proposals for a Draft Education (Northern Ireland) Order. It therefore wishes to make the following comments:

Articles 3-13

Armagh City and District Council recognises the importance of a relevant curriculum for young people, but consider it important that schools have flexibility in the delivery of the curriculum and the necessary resources to do so. Equally, sufficient safeguards must be in-built for the protection of both pupils and teachers.

Article 16 Pupils with Statements of Special Educational Needs

Armagh City and District Council wishes to seek further clarification on regulations relating to pupils with statements of special educational needs.

Article 17 Temporary Exemptions for Individual Pupils

Armagh City and District Council wishes to seek further clarification on temporary exemptions for individual pupils.

Articles 18–22 Access to Courses for Older Pupils

Armagh City and District Council wishes to seek further clarification on what constitutes a course and what is meant by ‘general’ and ‘applied’ courses.

Armagh City and District Council

Armagh City and District Council wishes to draw your attention to Article 18 (d) which excludes Key Stage 4 pupils from undertaking Irish at GCSE level. The wording should be amended to ensure that all pupils are provided with equality of opportunity, including those wishing to undertake GCSE Irish or those wishing to continue their studies in this subject in September 2006.

Armagh City and District Council wishes to point out that Irish will not be listed as an official language of the European Community until January 2007. The draft legislation refers to pupils availing *of any official language of the European Community*. The legislation, therefore, in its present form, also prevents pupils from undertaking GCSE Irish in September 2006. Consequently, Armagh City and District Council wishes to ensure that the legislation is amended so that those pupils wishing to undertake or continue their studies in GCSE Irish in September 2006 are not prevented from doing so.

Articles 27–29 Admissions

Armagh City and District Council wishes to draw attention to the lack of clarity on the proposed legislation which limits proper consideration of Admission Criteria. With the removal of academic selection criteria there remains concern that there are no alternative arrangements proposed that are universally acceptable. If non-academic selection is implemented there is a necessity for parents, schools and all other interested parties involved with the admissions process to have clarity regarding the arrangements. Without this clarity endless appeals will result.

Armagh City and District Council believes that pupils should attend the school best suited to their needs and aptitudes and has concerns about a system in essence of selection on the basis of parents' ability to pay.

Armagh City and District Council opposes Article 28 of the Order which is designed to amend Article 16 of the 1997 Order excluding the Board of Governors of a secondary school from including 'the academic ability or aptitude of the child' in drawing up criteria.

With falling school registers the proposals will see many non-grammar schools placed at a competitive disadvantage and the draft Order places the greater number of secondary schools at maximum risk.

Armagh City and District Council welcomes further consultation to reshape the admissions criteria that will result in equality of opportunity for all pupils. It recognises the necessity to ensure that parental preference is maximised.

Armagh City and District Council therefore believes that the current admissions criteria for schools is at variance with the overall objectives of the new post-primary arrangements as it does not provide freedom of choice to the parent/pupil. Consequently it wishes to express concern regarding current selection procedures whereby, for example, a pupil may be admitted to a school on condition that a sibling is attending that school.

Armagh City and District Council

Armagh City and District Council believes that equality of opportunity should be evident throughout the process. It expresses concern about the fact that the new arrangements could disadvantage pupils living within a rural community or pupils attending feeder primary schools which are not given priority for admission. This concern also relates to, for example, where an academically able pupil may be denied the opportunity to attend the preferred school as a result of postcode selection.

Armagh City and District Council welcomes the fact that pupil profiles will not be used as admissions criteria. Reference to the profile should only be made following placement of a pupil.

Armagh City and District Council also seeks clarification on the proposed arrangements for home to school transport for such pupils.

Articles 30-33 Suspension and Expulsion of Pupils

Armagh City and District Council believes that the responsibility for suspension arrangements for pupils are best placed within the school authority. In essence, it believes that the school authority has the skills to take immediate and effective action. It also believes that transferring this responsibility to the education authority will only elongate the process which will undoubtedly have a detrimental affect on the pupil concerned.

Armagh City and District Council also believes that the current arrangements for expulsions should remain unchanged. It believes that transferring full responsibility to the education authority would also elongate the process. Consequently the expelled pupil would be severely disadvantaged. However, Armagh City and District Council believes it to be necessary to provide an 'interim centre' whereby remedial support could be provided until the expulsion for the child has been fully processed. Consequently this type of arrangement will provide protection for the expelled pupil and other pupils.

Article 40 Miscellaneous (Removes the existing requirement on Boards of Governors to hold an annual parents' meeting)

Armagh City and District Council supports this proposal.

In conclusion, Armagh City and District Council welcomes, in principle, the 'child-centred approach' to the new post-primary arrangements. However, it wishes to point out that parts of the documentation are unclear and many areas still require further clarification and consultation. It believes that a pilot test on the new post-primary arrangements should have been carried out prior to implementation. It would add that the timing of the Review of Public Administration will inevitably have an adverse impact on the new post-primary arrangements and considers that the Draft Order should be postponed until this is concluded. This would provide the opportunity for fuller public debate on all the issues in the meantime.

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Armagh City and District Council

There are issues around the future sustainability of schools and a Sustainable Schools Policy has not been produced.

Armagh City and District Council therefore wishes to avail of any further consultations at the earliest possible date.

ARMAGH CITY AND DISTRICT COUNCIL

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