



**NCCA**

An Chomhairle Náisiúnta  
Curaclaim agus Measúnachta  
National Council for  
Curriculum and Assessment



# Primary Curriculum Review and Redevelopment

## Written submission template for organisations, groups and individuals responding to the *Draft Primary Curriculum Framework*

This template is intended to support you (and your colleagues/organisation) in developing a written submission in response to the *Draft Primary Curriculum Framework*. Please e-mail your completed submission to [PCRRsubmissions@ncca.ie](mailto:PCRRsubmissions@ncca.ie)

### *Individual submission details*

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The NCCA will publish written submissions received during the consultation. The submissions will include the author's/contributor's name/organisation. Do you consent to this submission being posted online?

Yes

No

Please email your submission to [PCRRsubmissions@ncca.ie](mailto:PCRRsubmissions@ncca.ie)

**Please provide some brief background information on your organisation (if applicable).**

The Dyslexia Association of Ireland (DAI) works with and for people affected by dyslexia, a specific learning difficulty which affects the acquisition of fluent and accurate reading and spelling skills, that affects approximately 10% of the population.

DAI works to empower individuals. We do this by providing information, offering support services, engaging in advocacy and awareness raising for people with and affected by dyslexia.

Our vision is a society that values and meets the needs of people with dyslexia, and where dyslexic individuals reach their full potential in all aspects of life.

Services offered by DAI include: the provision of information; assessment for dyslexia and dyscalculia; specialist tuition for children and adults; courses for parents; training for teachers and other education personnel; and lobbying and advocacy. [www.dyslexia.ie](http://www.dyslexia.ie)

The remainder of the template includes two sections. Section 1 invites your overall comments and observations on the *Draft Primary Curriculum Framework*. Section 2 is structured to align with the six key messages related to the framework. Each message is summarised as a support for you in working on the submission.

Please email your submission to [PCRRsubmissions@ncca.ie](mailto:PCRRsubmissions@ncca.ie)

# Section 1

**Please outline your overall response to the *Draft Primary Curriculum Framework*.**

The DAI welcomes the opportunity to provide feedback on the NCCA *Draft Primary Curriculum Framework*. We support the overarching aim for a new curriculum that is for every child, that is outcomes-focused, and that recognises the professionalism of our teachers. We welcome the emphasis on key interlinked competencies, that contribute to the overall learning experience of learners. We also welcome the aspiration to reduce the well-recognised current curriculum overload, and providing schools with sufficient flexibility to target key learning outcomes that are appropriate to the skills and attributes required for our young people to thrive and contribute to society into the middle of the 21<sup>st</sup> century.

DAI welcomes the fact that the framework's *Vision* talks about being *Inclusive*, and one of the *Overarching Principles* of the curriculum is *Inclusive Education and Diversity*. Therefore it is most disappointing that there is not a single mention of special educational needs, additional needs, specific learning difficulties or dyslexia/dyscalculia in the entire document. There is vague reference to diversity of '*competences*' but this certainly does not sufficiently address the distinct identity and needs of this group of children, that represent 10% of our school population. We would respectfully suggest that this is an oversight and highlight that inclusion in its most fundamental sense does not mean entirely ignoring distinct group of learners with distinct needs. Rather, and by definition, it means *including* them. The curriculum should respect neurodiversity and both recognise and include by design the needs of neurodivergent students.

While we support the concept of a curriculum informed by the principles and ethos of universal design, ("a move away from thinking in terms of ability and disability to thinking about variability, competency and opportunity") it is vital we don't whitewash the very significant and persistent individual differences and difficulties of learners with dyslexia and other additional learning needs. We believe this group needs specific and bespoke consideration, on top of a universal backdrop.

Our concern yet again is that those who learn differently are not being thought about in the vanguard of curriculum reform, and without explicit reference to children with additional needs, including dyslexia, these learners risk being 'lost' in the proposed curriculum, or only considered again as an afterthought in secondary guidance (e.g., the Guidelines for Teachers of Students with General Learning Disabilities, NCCA, 2007) after the launch and commenced implementation of the main curriculum. A good strategy is one where the needs of those who learn differently are at its heart (not its periphery), where all can see themselves referenced explicitly, and are fully and meaningfully included from the outset.

The Vision of the framework talks about it being "evidence-based" (p5) and the redevelopment of the curriculum informed by a [range of national and international research](#). However, it is

troubling that in all of the 14 papers cited there are only two brief mentions of dyslexia or SLDs (one brief mention of [neuroplasticity](#) and one mention in a [footnote](#).) As such it does not seem apparent that there has been sufficient consideration of the needs of students with dyslexia or other neurodivergent profiles when setting out this proposed curriculum, and it is again hard to see how the *walk* of being inclusive is matching the *talk*.

DAI welcomes the introduction of the competence '*Learning to be a learner*' as it is imperative that children fully understand the differences that arise from being neurodivergent and the impact on their learning. This insight into their own learning is however wholly dependent on timely and accurate assessment and identification of dyslexia. Children have a right to be assessed to enable teachers to put in the correct learning experiences and to set meaningful goals for their journey through school. Identification of dyslexia can be hugely supportive to students' self-esteem, mental health and their confidence as a learner.

The framework clearly elucidates the centrality of the teacher in achieving the aims of the new curriculum, however, in order to move this strategy from aspiration to reality, a comprehensive CPD programme will be required. Significant investment in high quality training resources will need to be provided for both practicing teachers and those undertaking initial teacher education. If class teachers do not have the professional competencies to understand the nuanced challenges of dyslexic and neurodivergent learners, then this framework will fail in its aspiration to meet the needs of all students.

As well as training for all teachers, there should be consideration given to how the aims of the curriculum might be optimally delivered by the development of specialist dyslexia teacher roles in schools (or shared between smaller schools), that would support equitable access to identification of dyslexia and support high quality evidence-based teaching. After all, dyslexia is the most common neurodivergent learner profile, affecting 1 in 10 of the population.

Consideration would have to be given to how modern foreign languages are taught, as the study of other languages can be difficult for students with dyslexia. If the focus is on the development of oral and aural components of languages, then success can be more achievable. There may be a need to ensure that within a school the skills around language teaching are prioritised to address deficits in individual teachers that leave them ill-equipped to appropriately teach a modern language – failure to do this may lead to substandard quality of pedagogy in this area that endangers the success of the whole enterprise. Some dyslexic students have an exemption from Irish and consideration needs to be given as to what learning they are involved in when the remainder of the class is doing Irish or other language learning. Similarly, learners with dyslexia should not have to choose between accessing learning support or learning another language, so timetabling also needs to be inclusive.

The success of the curriculum will ultimately be judged on the fidelity of its implementation and the success of learners as measured against intended outcomes. It is critical therefore that consideration is given as to how quality assurance and oversight will operate, and the role of the

school self-evaluation, NCCA and Inspectorate therein. Central to this process should be explicit consideration as to how well the curriculum is supporting the learning outcomes of those with additional learning needs including dyslexia. This process should also involve the active seeking and taking into account of the views of young people with dyslexia and their parents/guardians.

Finally, we would urge that it is made clear how this new proposed curriculum links with, or takes the learnings from, the Department of Education's *Literacy and Numeracy for Learning and Life: The National Strategy to Improve Literacy and Numeracy among Children and Young People 2011-2020*. It is presently unclear as to whether this strategy achieved its aims, if there is to be a successor strategy or how any learnings inform the new curriculum. Similarly, it would be useful to articulate explicitly how certain elements of the new proposed curriculum fit with other well-embedded philosophies and practice in the current education system, e.g. how the Continuum of Assessment as set out in the currently discussed framework fits with the Continuum of Need as currently set out by the Dept. of Education and NEPS.

## Section 2

### Agency and flexibility in schools

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Be for every child.
- Recognise teachers' and principals' agency and professionalism to enact the curriculum in their individual school context.
- Give more flexibility to schools in terms of planning and timetabling to identify and respond to priorities and opportunities.
- Connect with different school contexts in the education system.
- Give greater opportunities for flexibility and choice for children's learning.

**The Draft Primary Curriculum Framework outlines important messages in relation to agency and flexibility in schools. Please give your overall feedback in relation to this key message.**

The draft framework provides opportunities for teachers to make choices and to be flexible in how they work within the curriculum framework. This is welcome, as it affords an opportunity for teachers to use their professional judgement to differentiate the pace, breadth and sequence of their teaching to support all learners. In addition, flexibility should be given in how we assess children's learning. The introduction of the concept of universal design is also welcome.

However, while planning for *all*, it is still important to have additional differentiated or individualised supports for *some* students – those with more significant needs including those with dyslexia. Whilst flexibility is important, guidance will need to be provided to ensure that all teachers are following evidence-based practice in this regard.

While we welcome one of the Key Competencies *Communicating and Using Language*, it is surprising that there is no specific mention of 'literacy' or 'reading' or 'writing', and the descriptor is rather vague in this regard. This is in contrast to where the Government had previously prioritised the word 'Literacy' to the extent that it was directly referenced in a stand-alone strategy between 2011 and 2020.

On this theme, within the list of attributes for *Communicating and Using Language* there is appropriate mention of: Reading for enjoyment and with critical understanding; Writing for different purposes and for a variety of audiences; and, Exploring and creating a variety of texts. But there is no mention of the underlying skills that allow a learner to get there, i.e. the systematic teaching of structured literacy including phonics, as supported by the research around

the Science of Reading. An infant teacher spending their time diligently implementing a phonics scheme would find it hard to see where their most crucial work is represented in this competency and associated attributes.

DAI welcomes an approach that puts learning outcomes as central to the curriculum but does not see this as diametrically opposed to having clarity about the content and structure required within this framework, i.e. dyslexic learners require an explicit and systematic approach to the direct teaching of structured literacy. There is perhaps a risk therefore of a false dichotomy between outcome-focused and content-focused.

It could also be asked, should it really be left to schools and already stretched school leaders to devise the details of a curriculum i.e. to be the “curriculum makers” (p4). When the evidence base is crystal clear about the best content, order and approach to teach key skills, would it not be an appropriate role of the curriculum to provide concrete specifics of (i) what should be taught, (ii) when it should be taught, and (iii) how it should be taught? This is perhaps the very essence of a ‘curriculum’ and is not opposed to taking an outcomes focus at the same time.

The Department of Education and its agencies have a responsibility to take a leadership role to ensure that the curriculum is evidence-based, with clear expectations and parameters of practice, within which schools can work flexibly. Terminology within the document like “...which allow for variations in children’s learning needs” (p21) is worryingly passive. A better approach would be to take an active approach, with improved terminology consequently reading along the lines of “...which allow for *distinct planning to support* the variations in children’s learning needs”.

## Curriculum connections between preschool, primary and post-primary schools

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Provide a clear vision for children’s learning across the eight years of primary school.
- Link with learning experiences provided through the themes of the *Aistear: the Early Childhood Curriculum Framework* and connect with the subjects, key skills and statements of learning in the *Framework for Junior Cycle*.
- Support educational transitions by connecting with what and how children learn at home, in preschool and post-primary school.

**The *Draft Primary Curriculum Framework* outlines important messages in relation to curriculum connections between preschool, primary and post-primary schools. Please give your overall feedback in relation to this key message.**

DAI welcomes the emphasis placed on consistency and continuity between pre-school, primary and post-primary school. The transfer of information through Mo Scéal: Preschool to Primary Reporting Templates is particularly useful for children who may be already displaying signs of dyslexia or other learning differences, and it is useful to see these referenced in the draft curriculum. The link with learning experiences provided through the themes of *Aistear* is particularly relevant as it clearly sets out the child is on a ‘Journey’ through education with every child being unique.

A more robust transition process needs to be developed for the sharing of individualised information on children’s particular strengths and weaknesses at key transition points including the move between junior to senior primary settings (where applicable) and the transition to post-primary.

There may also be opportunities to exploit links between primary and post-primary settings especially if schools share a campus/location, especially around specific topics where equipment or teacher skills could be taken advantage of (e.g., science labs, PE equipment, language teachers).

We also welcome the connection of home and school learning and we hope this will include the integration of assistive technology for those students with additional learning needs such as dyslexia, so that they can continue to use their AT in both environments.



## Emerging priorities for children’s learning

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Embed seven key competencies across children’s learning outcomes from junior infants to sixth class.
- Focus on developing children’s skills, knowledge, dispositions, values and attitudes. The Learning Outcomes and the Key Competencies are broad in nature to describe this wider understanding of learning.
- Have increased emphasis on some existing areas such as PE and SPHE (Wellbeing) and digital learning, and have new aspects such as Modern Foreign Languages, Technology, Education about Religions and Beliefs (ERB) and Ethics, and a broader Arts Education.

**The *Draft Primary Curriculum Framework* outlines important messages in relation to emerging priorities for children’s learning. Please give your overall feedback in relation to this key message.**

The use of broad learning outcomes and key competencies is welcomed, in particular the focus on wellbeing and the centrality of teacher-student relationships. The voice of learners with additional needs must be incorporated in the design and content of training programmes to ensure that their voice and experience is valued, and to ensure that we see the learner in a holistic way.

The increased emphasis on digital learning is essential throughout primary and post-primary school to ensure that learners are ready for third level and workplace environments where this equipment is standard practice. If we want all students to become confident digital learners, they should be encouraged to use technology to support their learning in an integrated and natural way each day. This is especially critical for learners with dyslexia or other learning difficulties.

While we broadly welcome the formal introduction of modern foreign languages at primary school level, we must stress the importance of ensuring that languages are taught based on the science of reading approach. For learners with dyslexia, the written aspects of learning multiple languages can be very challenging. Clear consideration needs to be given as to how different languages are taught in a consistent way, and the order of when they are introduced. The methodology needs to be articulated and current inconsistencies between how English and Irish is taught (e.g. differential emphasis on phonics) needs to be addressed first.

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Some dyslexic students have an exemption from Irish and accommodations of this type need to be considered through the lens of additional language curricular expectations. Finally, the specific modern language needs to be considered through the lens of what language is most orthographically regular and therefore easier to access for a dyslexic learner, e.g. Italian is much more orthographically transparent than French.

## Changing how the curriculum is structured and presented

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Be broad and balanced in purpose and content.
- Be structured in five broad curriculum areas;
  - Language
  - Mathematics, Science and Technology Education
  - Wellbeing
  - Social and Environmental Education
  - Arts Education.

(In addition to the five areas above, the Patron's Programme is developed by a school's patron with the aim of contributing to the child's holistic development particularly from the religious and/or ethical perspective and in the process, underpins and supports the characteristic spirit of the school. These areas connect to the themes of *Aistear* and to the subject-based work in Junior Cycle.)

- Provide for an integrated learning experience, with curriculum areas in Stages 1 and 2 (junior Infants – second Class) and more subject-based learning in Stages 3 and 4 (third class – sixth class).
- Use broad learning outcomes to describe the expected learning and development for children.
- Incorporate the new *Primary Language Curriculum / Curaclam Teanga na Bunscoile*.

**The *Draft Primary Curriculum Framework* outlines important messages in relation to changing how the curriculum is structured and presented. Please give your overall feedback in relation to this key message.**

DAI welcomes the curriculum structure of five key areas and it is important that each of these areas is given equal importance. This presents a challenge for schools to ensure that all their teachers have the associated required professional competencies and access to the requisite materials to support learning in all areas. We welcome the inclusion of Wellbeing and hope that it gives schools the much-needed opportunity to prioritise discussions about difference, neurodiversity and supporting mental health.

DAI welcomes the incorporation of the existing Primary Language Curriculum into this proposed framework, in particular, the primary language toolkit that gives practical support for teachers to

provide rich language-learning experiences for children. The suggestion that the currently proposed curriculum would be supported by a similar toolkit with its emphasis on practical strategies and approaches is positive. Literacy underpins so much of all other competencies and other subject areas, and is vital to meaningfully access much of the post-primary curriculum.

While we recognise the role that school patrons play, the right of the child to a broad, balanced and equitable education is paramount. School ethos should at no time be allowed to conflict with or override critical components and principles of the curriculum.

## **Supporting a variety of pedagogical approaches and strategies with assessment central to teaching and learning**

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Promote high quality teaching, learning and assessment.
- Conceptualise assessment as an essential and critical part of teaching and learning.
- Highlight the importance of teachers' professional judgement in supporting progression in children's learning.
- Encourage teachers to make meaningful connections with children's interests and experiences.
- Recognise the significance of quality relationships and their impact on children's learning.
- Recognise the role and influence of parents and families in children's education.

**The *Draft Primary Curriculum Framework* outlines important messages in relation to supporting a variety of pedagogical approaches and strategies with assessment central to teaching and learning. Please give your overall feedback in relation to this key message.**

To ensure high-quality teaching and to make sure that teachers are competent to support progression in dyslexic children's learning, mandatory initial training and ongoing professional development is required, to ensure that all teachers are confident and competent in a range of evidence-based pedagogical approaches.

While we see that assessment is a critical part of teaching and learning, it is essential that this assessment is sensitive to the needs of students with dyslexia. Many forms of assessment already in use do not always accurately pick up those students with dyslexia who are most in need of early identification and support. Delayed dyslexia identification may not only delay the provision of interventions and accommodations but can also have a very negative impact on mental health and confidence.

**Building on the successes and strengths of the 1999 curriculum while recognising and responding to the challenges and changing needs and priorities.**

*The 1999 curriculum contributed to many successes including:*

- Enhanced enjoyment of learning for children.
- Increased use of active methodologies for teaching and learning.
- Improved attainment levels in reading, mathematics and science as evidenced in national and international assessments.

*The Draft Primary Curriculum Framework proposes that the redeveloped curriculum will:*

- Address curriculum overload at primary level.
- Take stock of strategies, initiatives and programmes and clarify priorities for children's learning.
- Link with *Aistear* and *the Framework for Junior Cycle*.

**The *Draft Primary Curriculum Framework* outlines important messages in relation to building on the successes and strengths of the 1999 curriculum while recognising and responding to challenges and changing needs and priorities. Please give your overall feedback in relation to this key message.**

DAI agrees that it is important to build on the 1999 curriculum. However, despite this curriculum being in schools for over two decades, we are concerned that there is still much teaching practice that does not meet the aspiration of even the 1999 framework, e.g. the failure to incorporate active teaching methodologies or multi-sensory learning into daily teaching, and the dominant model of textbook-led whole-class teaching to the middle, without sufficient differentiation or individualisation based on learning needs.

There is some concern therefore around the adaption of this new proposed curriculum which allows for *more* flexibility. It is imperative that this high-level framework is supported by clear operational guidance on best practice and accompanied by rigorous formative assessment of its implementation by schools, NCCA or the Inspectorate, with specific reference to vulnerable groups including these with additional learning needs like dyslexia, and that includes the direct views of young people with dyslexia and their parents/guardians.

## **Covid-19**

**Since the publication of the *Draft Primary Curriculum Framework*, Covid-19 has presented a big challenge for schools. Please give your views on the implications of schools' experience of the pandemic for the finalisation of the *Primary Curriculum Framework*.**

The Covid-19 impacts were incredibly varied on schools and on children. While some embraced technology, other schools were slow to adapt. Many parents and teachers have reported that children have fallen further behind their non-dyslexic peers. Some children struggled hugely with learning during lockdown, whereas other did well, getting one-to-one support, being able to work at their own pace and without the stress that attending school brings for some students.

Teachers and schools undoubtedly need both technology resources and training to incorporate this into the curriculum for both normal and pandemic times.

The focus on wellbeing also needs to recognise that school can be a challenging environment for some neurodivergent students and schools can work to address this as part of wellbeing measures.

## **Data Protection**

The NCCA fully respects your right to privacy. Any personal information which you volunteer to the NCCA will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts. If you require further information related to data protection please visit [www.ncca.ie/en/privacy-statement](http://www.ncca.ie/en/privacy-statement) or you can contact the NCCA's Data Protection Officer at [dpo@ncca.ie](mailto:dpo@ncca.ie).

**Thank you for your submission.**

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