



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

Individual submission details

Name	N/A
Date	N/A
E-mail	N/A

Organisation submission details

Name	Dr. Seline Keating	
Position	Chairperson	
Organisation	The SPHE Network	
Date	14/12/20	
E-mail		

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	√
-----	---

Please email your submission to PCRRsubmissions@ncca.ie

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

The SPHE Network has been active for twenty years. It was founded in 2000 by Dr. Bernie Collins (DCU Institute of Education, formerly St. Patrick's College) and Dr. Carol O'Sullivan (Mary Immaculate College). It has grown significantly since then with membership increasing annually.

The Network's mission is to create an inclusive and collaborative community where the teaching and learning of SPHE and Wellbeing is a shared interest among members, and is actively promoted and valued. The Network provides a national forum for teacher educators, student teachers, practicing teachers and leading organisations to share SPHE and Wellbeing teaching and learning practices.

Biennially, the SPHE Network organises a national conference with a subsequent conference proceedings publication. The SPHE Network members meet three times a year. The location of these meetings and biennial conferences rotates between the Initial Teacher Education providers of DCU Institute of Education, Mary Immaculate College, Froebel Education Department in Maynooth University and Marino Institute of Education. At Network meetings, members

- provide updates on current SPHE research projects;
- share their contributions to, and deliberate on, SPHE education policy;
- debate and respond to SPHE curriculum redevelopments;
- review and exchange SPHE methodologies and classroom resources;
- engage in professional development.

To date, our four nationally engaging SPHE Network Conferences have explored different SPHE teaching and learning areas: The future of SPHE; Wellbeing; Citizenship; Diversities and the upcoming theme for 2021 is Media Education.

See www.sphenetwork.ie for further details.

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.

Section 1

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

Our overall response to the Draft Primary Curriculum Framework is outlined below through five key points: additional time allocation; acronym change; RSE; wellbeing, and teacher agency.

1. Additional time allocation

The SPHE Network welcomes the additional time allocation and greater emphasis on SPHE and Wellbeing, specifically the holistic approach, as outlined throughout the *Draft Primary Curriculum Framework*. While the current provision of SPHE, as per the 1999 curriculum, is inclusive of a positive school climate and an integrated approach, affording more discrete SPHE time is advantageous for both teachers and pupils. It also clearly acknowledges and responds to the calls for increased time to be allocated to the existing SPHE curriculum and for a greater emphasis on Wellbeing (p.2). The recognition and prioritisation of "fostering wellbeing" as one of the core competencies is viewed favourably by members.

2. Acronym Change

However, we deem the change from SPHE to SPVE as unnecessary and strongly suggest that this be reconsidered. Since the introduction of SPHE in the 1999 curriculum, the subject area has grown from strength to strength in its value and worth. This is clearly visible in recent DES policy, DES reviews, Programme updates, Inspectorate priorities, School Self-Evaluations and an increased dedicated PDST team to the area of SPHE and Wellbeing to facilitate schools' CPD demand within this subject area.

We believe that values education already exists within the SPHE Curriculum in its content, methodologies and skill-set, therefore replacing the H in SPHE with a V is unwarranted. The rebranding of SPHE does not benefit teachers who repeatedly speak strongly about curriculum overload and limited time allocation to teaching the SPHE curriculum. Affording more <u>time</u> to SPHE addresses teachers' needs and enables them to deliver the SPHE curriculum in a meaningful manner. Their call was not for SPHE to become SPVE or for the SPHE curriculum content to change. This is echoed in the findings from the Consultation on the proposals for a curriculum in Education about Religions and Beliefs (ERB) and Ethics: Final Report (2017) pp.101; 114; 117.

"... such a curriculum is not needed; that the current curriculum is already overcrowded; and that the suggested topics duplicate a lot of what is already taught in the primary schools." p.101

"It was suggested that 'SPHE covers a good deal of what is being proposed". p.114

"...the question of curriculum overload and time allocation was raised in all groups" p.117

We are also concerned about overlap with Ethics education and wish to avoid confusion here e.g. NCCA 2017 report refers to ERB and Ethics bringing relational skills to the curriculum such as empathy, tolerance and respect. These relational skills already exist in SPHE and also within the

school's patron's programme and time allocated to that curriculum area. We see ERB and Ethics falling under the curriculum area titled *Religious/Ethical/Multi-belief Education-Patron's Programme* as proposed in the Draft Primary Curriculum Framework p. 11. Teachers are grappling with understanding Wellbeing as it is, therefore changing SPHE to SPVE would be impractical and cause additional confusion.

The acronym change would have a significant impact on the momentum and visibility achieved by the SPHE Network. The Network was founded in 2000, has built a strong membership and made significant contributions to the visibility of SPHE and Wellbeing at a national level. The Network has been instrumental in raising the profile of the subject area through its website, four previous conferences and publications, to name but a few of the Network's initiatives. Values education has always played a key role in SPHE so we cannot see the need to change the terminology at this stage.

The Draft Primary Curriculum Framework clearly advocates for curriculum continuity and connections between Early Childhood, Primary and Post-Primary Education (p.2). This is indicated explicitly on p.2 of the document "Reviewing and redeveloping the primary curriculum provides an important opportunity to build on what children bring to primary school and to ensure connections with their post-primary experience..." p.2. Changing SPHE to SPVE is not in line with the above. For example, throughout the NCCA Junior Cycle documents for Wellbeing, such as the *Guidelines for Wellbeing in Junior Cycle* (2017); *Planning for Junior Cycle Wellbeing* and along with both the DES' *Framework for the Junior Cycle* (2015) and *Circular 0055/2019*, there is no mention of SPVE. Social Personal and Health Education, SPHE, is referenced throughout the above guiding documents. SPHE short courses are referenced, not SPVE short courses. Therefore, the curriculum connections and continuity which the NCCA Draft Primary Curriculum Framework advocates for will be lost by introducing SPVE at just primary level.

3. Relationships and Sexuality Education

Considering the significant RSE redevelopments that began in 2018, it is alarming and worrying to see very little mention of RSE throughout the Draft Primary Curriculum Framework. To date, the consultations and symposiums on RSE developments have been a positive and enriching experience. Therefore, it would be beneficial to see the fruits of the above acknowledged and embedded within the Draft Primary Curriculum Framework rather than being on the periphery of the curriculum review. We wish to avoid a repeat situation of 1999 when SPHE and RSE seemed to be placed on parallel yet separate trajectories.

4. Wellbeing

One of the concerns to consider is the amount of change proposed for teachers in the area of wellbeing. While the concept of wellbeing has received much attention in recent years from many perspectives, including education, a review of academic literature highlights the confusion around the term as there is not a universally accepted definition. According to Souttera et al. (2014, p. 497), "despite significant attention to conceptualising and evaluating well-being in academic and in policy circles, well-being remains a narrowly defined, if not undefined, term in education, complicating efforts to plan for and monitor it effectively". The focus on wellbeing is so much broader than subject areas and the curriculum structure proposes a new area of learning and new subject areas within the new area of learning. We would welcome clarity on the expectations relating to what

material will be addressed in the curriculum area of Wellbeing and its integration into other curricular areas (not limited to SPHE and PE).

5. Teacher Agency

"An agentic teacher is reflective, competent and capable of exercising professional judgement in response to individual learning needs in a variety of contexts" p.5. Consideration is needed when viewing the teaching profession as a collective, as different confidence and competency levels may exist within the collective itself, especially for certain subject areas. Scaffolding and clear curriculum guidance needs to be provided to support teachers.

The SPHE Network is seeking a number of clarifications on the proposed new vision for SPHE, through the following questions:

> What is the rationale for retitling SPHE?

Why has 'health' been removed from SPHE and replaced by 'values'? Why change the name of the curriculum subject which teachers have actively asked to be allocated more time?

- How is the positive progress made in the redevelopment of Relationships and Sexuality Education (RSE) reflected in the new framework?
- How is concept of 'wellbeing' defined and promoted within this new framework?
- How do you achieve the agentic teacher?

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 SPHE Network welcomes the concept of the 'agentic' teacher and view it as a key element of Teacher Education. We are tasked with developing the agency of our student teachers and helping them to understand this role in an increasingly diverse society. The notion of agency is particularly relevant to SPHE and Wellbeing as the child's life experience depends on their levels of Wellbeing. While Wellbeing is difficult to define, there is general recognition that it is premised upon both subjective and contextual elements and this is clearly represented in the definition of the 'agentic' teacher on p. 5 of the draft framework. We recommend that the role of SPHE and Wellbeing in promoting agency be referenced in the document. We also welcome the recognition of active citizenship as a key competency in the document and its role in facilitating the agency of both the teacher and the child. We suggest that the terms 'agentic' or 'agency' be specifically included in the section on being an active citizen on p.8. We consider that the transformative nature of education should be included with the concept of agency. This is implicit in the document but needs to be foregrounded, particularly in relation to pedagogy. We were unable to locate any reference to transformation in the document. Agency and transformation are also key features of Global Education which is addressed both in SPHE and also in Social and Environmental Education.

Network members who are Teacher Educators in the areas of SPHE and Wellbeing, consider that the focus on flexibility need greater exploration. It is specifically referenced once in the document. It seems to be presented mainly in relation of time, and of course this is very important. However, it also needs to be related to agency. A multi-lingual and multi-cultural society requires flexibility in terms of attitudes, understanding, curriculum content and pedagogy. We recognise that this is implicit in the document but it needs more visibility.

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.

The Draft Primary Curriculum Framework clearly advocates for curriculum continuity and connections between Early Childhood, Primary and Post-Primary Education (p.2). This is indicated explicitly on p.2 of the document "Reviewing and redeveloping the primary curriculum provides an important opportunity to build on what children bring to primary school and to ensure connections with their post-primary experience..." p.2. Changing SPHE to SPVE is not in line with the above. For example, throughout the NCCA Junior Cycle documents for Wellbeing, such as the Guidelines for Wellbeing in Junior Cycle (2017); Planning for Junior Cycle Wellbeing and along with both the DES' Framework for the Junior Cycle (2015) and Circular 0055/2019, there is no mention of SPVE. Social Personal and Health Education, SPHE, is referenced throughout the above guiding documents. SPHE short courses are referenced, not SPVE short courses. Therefore, the curriculum connections and continuity which the NCCA Draft Primary Curriculum Framework advocates for will be lost by introducing SPVE at just primary level.

Wellbeing is a now a key feature of the child's learning trajectory and is accorded significant focus in Aistear (NCCA 2009), the draft primary curriculum framework, the Junior Cycle Framework (NCCA 2015) and the Junior Cycle Wellbeing Guidelines (2017). This helps to reinforce the concept as constantly evolving lifelong learning. Therefore, it is difficult to give consideration to the draft primary curriculum framework independently of the other developments in this area. Teacher Educator members of the Network at primary level, we consider that we provide sufficient focus on Wellbeing to ensure teacher capacity in this area. Wellbeing is also addressed in Early Childhood Education. Our concern is that at post-primary level, which is specifically subject centred, there is currently no requirement on teachers to have Wellbeing as part of their overall formation. There is a culture in some post-primary schools to allocate SPHE/Wellbeing to teachers who have insufficient hours, regardless of the extent of their qualifications (NicGabhainn et al. 2010; O'Higgins 2013). Wellbeing needs recognition as a specific post at post-primary level with a requirement of relevant qualifications and experience. Otherwise the connectivity between the different stages may be eroded due to limited teacher capacity. While the Junior Cycle Wellbeing Guidelines (NCCA 2017) provide a comprehensive outline of implementation, there is little consideration given to the importance of teacher capacity and qualifications – CPD in this area is mentioned only once in the 2017 document.

Also, it is important that student teachers in all stages of this trajectory have sufficient knowledge of the key Wellbeing documents relating to the entire trajectory and not just the stage in which they are directly involved.

To facilitate effective linkage between each stage of the Wellbeing trajectory for practicing teachers, we suggest that CPD for the introduction of the revised curriculum include detailed consideration of all key documents and not only the primary curriculum. Input and discussion from ECE teachers and post-primary teachers, along with primary teachers, would be very relevant.

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.

We welcome the important messages in relation to emerging priorities for children's learning. We particularly welcome the increased emphasis on the area of Wellbeing, and the focus on PE and SPHE within the broad area of wellbeing. We also consider the importance of skills, knowledge, dispositions, values and attitudes as an essential element of the experience of all pupils in their primary school years.

The draft framework recognises that "the curriculum areas and subjects contribute to the development of the key competencies" (NCCA 2020, p.7). We would welcome further information on the rationale for the change of title of Social, Personal and Health Education (SPHE) to Social, Personal and Values Education and the change of focus this may bring to the subject area. The health component of SPHE is not included with Physical Education. Many areas of health education are currently explored in the current SPHE curriculum

including substance use, food and nutrition, naming of the body parts, physical changes that occur in the body with the onset of puberty, sexual intercourse within the context of a committed loving relationship and treating the body with dignity and respect to name but some broad concepts (Government of Ireland 1999). Within the exploration of this work there is a huge focus on values work with pupils and the development of skills- skills and values that will support children in decision making both now and into the future. Clarification is welcome on what the structure of the new subject areas within wellbeing will comprise.

One of the concerns to consider is the amount of change proposed for teachers in the area of wellbeing. While the concept of wellbeing has received much attention in recent years from many perspectives, including education, a review of academic literature highlights the confusion around the term as there is not a universally accepted definition. According to Souttera *et al.* (2014, p. 497), "despite significant attention to conceptualising and evaluating well-being in academic and in policy circles, well-being remains a narrowly defined, if not undefined, term in education, complicating efforts to plan for and monitor it effectively". The focus on wellbeing is so much broader than subject areas and the curriculum structure proposes a new area of learning and new subject areas within the new area of learning.

A new aspect mentioned in the emerging priorities is 'Education about Religion and Beliefs and Ethics'. In outlining the area of wellbeing, the draft curriculum framework highlights "it is important for children to develop their own ethical understanding of the world" (NCCA, 2020, p.13). The SPHE Network would welcome clarity on how ethics education will be embedded into the new curriculum structure.

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;
 - o Language
 - o Mathematics, Science and Technology Education
 - \circ Wellbeing
 - o 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.

This section of our response focuses on:

- 1. The foundational elements of SPHE, and
- 2. The use of language.

The SPHE curriculum (1999) is a prime example of the successes of the 1999 primary school curriculum more broadly, as outlined on p.1 of the Draft Primary Curriculum Framework (2020). The SPHE Network acknowledges the need to respond to new cultural, educational, and societal challenges and welcome the allocation of more time in the delivery of the new curriculum framework. Simultaneously, we do not wish to lose the very essence of SPHE as we endeavour to incorporate wider demands. Acknowledging the strong three-pillar foundation upon which SPHE has flourished, namely knowledge, skills, and attitudes, we seek to retain these core elements of the SPHE curriculum going forward. Knowledge, skills, and attitudes are the very qualities that are essential in a rapidly changing world. Each of the three cultivate in pupils the necessary skills needed to imagine the situations of 'others', promote rich imagination, and support the recognition of mutual need and interdependency. Knowledge, skills, and attitudes offer unique insights that are of intrinsic value to society, in general, and to pupils, in particular, as we aim to become globally minded citizens within democratic societies, inclusive of all. A strong curriculum, as the 1999 SPHE curriculum provides, allows a unique opportunity to nurture empathy and identify cultural blind spots. The spiral approach of SPHE cultivates empathy for others, provides opportunities to develop critical thinking skills and allows children to come to understand themselves.

Language provides an important consideration when changing how the curriculum is structured and presented.

The SPHE Network noted significant omissions in relation to RSE, personal safety and Child Protection throughout the document (see pages 8-14).

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.

We welcome the key focus on a variety of pedagogical approaches and strategies as proposed in the draft curriculum focus and the central place of assessment in the teaching and learning process. In relation to SPHE, active learning is the central methodology of the curriculum. The active learning strategies recommended in the 1999 curriculum have enabled children to become active agents in their own learning. Indeed, many of the strategies of the 1999 curriculum should be included in the new curriculum structure and extended and developed to future proof the forthcoming iteration of the curriculum.

The proposed curriculum framework provides an opportunity for pedagogical approaches and strategies that incorporate developments in neuroscience, neurophysiology and psychology to be utilised. Mindfulness is one approach that incorporates some of these developments. Its effects have been shown to develop improved decision (choice) making, self-awareness, resilience, self-regulation(self-care) and pro-social behaviour (care towards others), all key attributes of fostering wellbeing.

The significance of quality relationships with teachers is particularly relevant in a subject area such as SPHE, and its discrete elements, most notably the personal safety skills component of the programme. A relationship of trust is the key enabling factor in children telling if they are suffering from abuse of any kind. While parents are recognised as the primary educators of their children and play such an influential role, consideration needs to be given to the rights of children, particularly when it comes to the sensitive areas of the RSE programme and the Stay Safe programme. While parents retain the right to opt their children out of these elements of SPHE, it is timely to consider it this in the best interests of the child. Ireland has ratified the United Nations Convention on the Rights of the Child since 1992, and accordingly children's rights must be given due consideration. This draft also provides an opportunity to further promote Restorative Practice to enhance positive relationships, the ability to deal with conflict and the development of empathy and respecting difference.

The role of assessment is SPHE has potential to be developed to ensure that it is more closely aligned to the teaching and learning process. Teacher Observation is the main method whereby teachers assess SPHE and while this is a very important component of the assessment process, and takes account of teacher professional judgement in supporting progression in learning, there is potential for it to become a more "essential and critical part of teaching and learning".

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.

icums.

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.

As observed on p.1 of the Draft Primary Curriculum Framework, the Primary School Curriculum of 1999 was indeed cutting-edge. Therefore, it is important to not completely abandon its principles and content when drafting a new curriculum.

One of the many strengths and successes of the 1999 curriculum was the introduction of the subject SPHE to the primary curriculum. Irish data from the WHO Health Behaviour in School-Aged

Children (HBSC) Studies highlight the affirmative impact of the SPHE curriculum on children in Ireland and also its sheer necessity in educating children about general health and wellbeing, substance use, relationships and sexuality education, food and nutrition, self-care, friendships and bullying behaviours and media to name but some of the SPHE curriculum topics (Költo et al., 2020). Active methodologies such as Circle-time and transformative and experiential learning methods are utilised by many teachers when teaching SPHE.

When developing a new curriculum, the delivery of this curriculum is of paramount importance. Therefore, caution is needed when viewing the teaching profession, as different confidence and competency levels may exist within the collective itself, especially for certain subject areas. The *SPHE Teacher Guidelines* document is beneficial to teachers as specific guidance is provided for the subject area in the 6 sections: SPHE in the primary curriculum; the content of the SPHE curriculum; school planning for SPHE; classroom planning for SPHE and; approaches and methodologies. The array of exemplars provides teachers with stimuli and starting points for teaching SPHE. The sample criteria for choosing resources (p. 103 SPHE TG) is also very beneficial to teachers, especially with the emergence of many commercial SPHE resources which may potentially displace the curriculum content. The above needs to be considered when developing the new online "toolkits" on Table 3 p.12.

While curriculum overload is acknowledged in the draft framework, there is also mention of including new aspects of learning to an already overloaded curriculum such as Coding and Computational Thinking, ERB and Ethics, and Modern Foreign Languages. The introduction of new learning areas with an assumption of confidence and competence is likely to compromise teacher wellbeing. Coding and Computational Thinking and Modern Foreign Languages require a specific skillset among teachers thus impacting not only on the level of inservice needed but also what is provided at Initial Teacher Education (ITE). Time needs to be allocated to these new subject areas both at ITE and curriculum level. What existing curriculum subject areas will lose time on the BEd programme at ITE and in the classroom context to accommodate the introduction of the above new subject areas? Quality over quantity would be advisable for the above new learning areas while also considering the purpose of education.

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 <u>www.ncca.ie/en/privacy-statement</u> or you can contact the NCCA's Data Protection Officer at <u>dpo@ncca.ie</u>.

Thank you for your submission.

Please email your submission to <u>PCRRsubmissions@ncca.ie</u>