
Reflections on our Participation in the ELE Working Group

- Peter Lahiff @lahiffp -



a network of English language teaching professionals

Ready Steady Acronyms

DFHERIS, ILEP, QQI,
DoE, DFA, EI,
PCN, ILSG, IEM
MEI, ICOS, ELSU,
ELTi, UtU, SIPTU
DEASP, ELEWG



August letter from DFHERIS

The Department has a wide range of concerns surrounding the reopening of the ELE sector in the context of the full array of public health implications that come with such a step. [...] Our most immediate concern relates to the prospect of the sector bringing in additional students from outside the State. These serious concerns are shared by the Department of Health.

[...]

In this context, the Department welcomes **the proposal of a voluntary moratorium** from the sector to suspend the recruitment of International students until 2021. We would be grateful to receive a list of the ELE providers which are signing up to this moratorium. - 18/08

August letter on Blended Learning

In this context, the Department's position is that **all providers should, without delay, return to classroom delivery** to meet the needs of students already in Ireland and who require immigration permission to remain in the State in ways that are consistent with public health advice.

In the future, we see online delivery for this cohort of students as being appropriate only as a contingency measure, in circumstances where Government places restrictions on activities within society and the economy, either on a national or regional basis, in light of the public health situation.

We do not see online or blended learning as an appropriate business model which would permit the recruitment of ELE students into the State from outside the EEA.

August letter on COVID Protocols

[None of the documents] presented by the sector, speak to these wider challenges that exist within the ELE sector, nor **do they give sufficient and credible assurances regarding how public health measures would be implemented for new incoming students.**

It does not address the capacity of the sector as a whole to deliver on the measures set out in the protocol, **it does not consider how the sector will deliver for all its existing students upon reopening** nor does it address the range of issues that have presented to the State in managing the fallout from the ELE sector arising from the pandemic.

August letter on Recruitment

Given the Department's experience of issues arising from the ELE sector over recent months and the lack of detailed information, planning and assurances received to date, **there are currently too many unknowns and concerns to support any resumption of recruitment activity which would result in new International ELE students entering the State.**

There are substantial concerns surrounding the capacity and resources of the sector as a whole to make the necessary arrangements to manage the inflow of new students safely, **to ensure that these students have appropriate accommodation both for the purposes of restrictions on movement upon arrival and for the duration of their time in Ireland**, to ensure that these students are capable of supporting themselves without recourse to State supports and that the necessary standards of educational provision will be in place.

ELEWorking Group - getting the call

18/09: I got a call asking if I would represent ELT Ireland at **an expanded meeting of their English Language Working Group** on Wednesday to talk about the management of COVID in schools. I said I'd I would be happy to do it as I have been managing all these issues at my school and am familiar with the challenges involved. Just wanted to confirm with committee that you are ok for me to go ahead.

22/09: At the first ELE Working Group Meeting the key issues will be Managing COVID restriction with face to face lessons and the mitigating risks in student accommodation.

Meetings: & Members



ELE Working Group Meeting 23 September @ 11am

ELE Working Group Meeting Thurs 26th November @ 14.30

ELE Working Group Meeting Tue 22nd December @ 2.30pm

ELE Working Group Meeting Wed 27th January @ 2.00pm

Regularity in ToR Twice monthly or as necessary in addition!

MEMBERS:

DFHERIS, QQI, Department of Employment Affairs & Social Protection,
Department of Justice, Department of Foreign Affairs and Trade, Enterprise
Ireland, MEI, PCN, ILSG, ICOS, ELSU, ELT Ireland, Unite the Union, SIPTU.

ToR: Overall

- To act as a forum to identify, discuss and address the ongoing challenges and issues created for the sector by COVID 19.
 - To assess the **current status of the sector**, its existing capacity and its capabilities including:
 - its plans for an incremental and phased approach to facilitate **the gradual restoration of full activity** in the sector while protecting public health and safeguarding the welfare of staff and students.
 - its **progress towards the development of relevant protocols** to support the restoration of activity in line with public health guidelines and the Government's Framework for Restrictive Measures including monitoring the effectiveness of the measures that have been put in place in response to COVID-19.
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ToR: Key areas of focus

- Ongoing **coherence** in response to the public health crisis;
 - The full and **safe restoration of in-person educational provision** including necessary measures for the safety of staff;
 - The implementation and maintenance of **high quality pedagogical standards**;
 - Student **welfare issues** (including health, wellbeing, accommodation and employment issues);
 - Strong **communications and messaging** across the sector with a specific emphasis for students;
 - Exploring methods utilising **behavioural science to promote compliance** with public health guidelines and advice across the sector.
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ToR: In meeting these we will



- Prioritise the **full and safe resumption of in-person educational provision** across the sector for the existing cohort of students in the State.
- Address **core issues in the sector which have required State supports** and interventions since the outbreak of the pandemic.
- Engage with public health authorities as necessary.

Observation about the ToR for the Working Group: One of the focuses of its work to formulate a COVID protocol for the sector has to be to send out the message internationally that **Ireland is a safe place to come and study**. When comparing Ireland to competing destinations such as Canada and Australia, students see Ireland as being just as bad (or good) as the rest of Europe. Establishing a reputation for safe practice across the sector will be essential to attracting students in future. - 25/11

First meeting Contribution - 23/09

We need to consider practicalities of Effective Learning in the guidelines.

- Online Learning is not just about turning on the video and replicating the class. It has to be done differently.
- Blended Learning may involve an asynchronous element need to think how to prove “attendance”.
- Face to Face teaching with distancing is not the same as teaching in normal circumstances.

We also need to Identify examples good practice and who is doing a good job in a very challenging scenario.

Draft Proposals - 22/10

- ELTO Covid-19 Reopening Information and Compliance Checklist
 - ELE Student Covid-19 Accommodation Protocols
 - Covid-19 Accommodation Declaration Form
 - ELE Ireland Pre-Arrival Documents Protocols
 - ELE Ireland Advisory to Host Families
 - ELE Ireland Advisory to Prospective Students
 - ELE Ireland Advisory to Students already in the State
 - COVID-19 Self-Declaration Form
 - ELE Ireland Protocols for a Suspected or Confirmed Case of Covid-19
 - ELE Ireland Online Provision Protocols
 - ELE Ireland Under-18s Guidance Protocols
 - ELE Ireland Airport Pickup Protocols
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Draft Proposal Feedback - 26/10



I am attaching the draft proposals that they have circulated and if you would like us to comment on any aspect of it please email before Wed 28th October.

The purpose of this working group, as it is framed by the civil servants facilitating it, is to **formulate a COVID protocol which shows how language schools can operate safely for new and existing students.**

ELT Ireland's intention is to take feedback gathered from members as it relates to **good practice in English Language Teaching and Academic Management and make constructive suggestions** as to how this documentation can be improved.

I appreciate the concerns about how the working group came to produce these documents, but it does not fall within ELT Ireland's mission to get involved in those questions or those regarding terms of employment as those are represented by other contributors.

Draft Proposals: Submission 1



Provision for End of Course Exams: At levels 4 & 5 Adult we are primarily online but the roadmap allows exemptions for essential onsite activities. This should include end of course exams conducted, where this can be done safely with 2m distancing as the nature of our courses is that if we delay the culmination of their programme they have often dispersed and are unable to do it at a later date.

Classroom Ventilation: There is increasing evidence that ventilation is a key element to reducing the risk of transmission. Protocol should recommend ventilation during lessons and, given the winter climate, that be a break at most every two hours in order to open all windows / turn up extraction and ventilate the room. Rooms which lack adequate ventilation cannot be considered suitable for teaching.

Draft Proposals: Submission 2



Visors v Masks: There should be clear direction that visors do not provide adequate protection for colleagues or classmates.

Blended Learning at Level 3: 15 hours on camera does not represent a valid pedagogy for English language teaching but should include an element of asynchronous individual tasks. These should be completed with supervision and feedback from their class teacher and done on a suitable online platform with attendance proven task time completed representing a third to a half of their course hours.

This would be an appropriate escalation measure at level 3. In order to ensure schools have the capacity to resume full face to face, it could be mandated that the schools produce a staggered timetable which shows that all students can be accommodated in the building at the same time.

Draft Proposals: Submission 3



Lead worker representatives: Guidelines suggest this should not be a member of the management team but as many schools have a small core staff there should be flexibility on that as long it is someone involved in organising the front line delivery then they could be considered for the role.

- The lead worker representative would need to familiarise themselves with the regulations and the school protocol, consult with colleagues and represent their view at meetings. Need to consider the expectation of time that would need to be dedicated to the role and whether they need to be freed up from their normal duties to allow them to do it.

- Guidelines seem to suggest this should be a voluntary role but in reality few staff would be interested in putting themselves forward for something like this.

- It should be formalised and require some form of health and safety training, as child protection roles do.

Draft Proposals: Submission 4



Dealing with cases in the school: In order to provide reassurance for staff and students, schools need to produce an action plan with the specific steps they will take when there are cases in the school which considers these three possibilities.

1. If a student or teacher is told to self-isolate and get tested due to being a close contact
2. If a student or teacher is told to self-isolate due to being a suspected case
3. If a student or teacher has tested positive for COVID-19

Here is an example of what this would look like from one of our members;

Draft Proposals: Submission 5



Documenting Justification of Absence: We cannot have a situation where there is an imperative on students to attend school when it is any suspicion of them having COVID. To that end text messages from the HSE advising students to restrict movements and get tested along with confirmation of GP and testing appointments should be accepted as adequate documentation for justified absence for the purpose of attendance calculations.

Public health advice also requires that people suffering non-COVID symptoms of a cold or flu should stay home for 48 hours before seeking a test, if it persists. In such cases it should be possible to apply justification from the beginning of symptoms being notified to the school based on them presenting proof of their GP or test appointment.

Draft Proposals: Submission 6



Teachers as Close Contacts of their Class: Some consideration needs to be given to the circumstances under which a teacher would be considered a close contact of one class where there is a case and, therefore, a possible link in the chain of transmission to another class. Guidelines state that this comes down to whether they have spent 15 mins+ at less than 2m from the case in the last 14 days and whether the classroom is adequately ventilated. The only person adequately placed to make this judgment is the teacher themselves. The protocol should recognise that having a suspected case in one of a teachers' classes, may mean precautionary measures being extended to all their classes.

High Risk or Very High Risk Individuals: Where students can produce a valid medical certificate to say they are high risk and should not be in class at a specified risk level (2 or 3) then such students should be taught online by teachers who are similarly at risk.

LWR: Role in Practice - Nov



Could Lead Work Representative be analogous to DDLP under child protection rules? A named person who is introduced to everyone and who gets training and has a procedure for reporting issues to the Health & Safety office and the HSA. - 08/11

I also wanted to follow up on the point that I was making about the role of the lead representative in the new procedures as I don't think it came across clearly in the meeting.

I am finding it hard to understand from the proposals made so far, how the role of the Lead Representative will operate in practice so I was making an analogy with the system which operates in the area of child protection, which we are familiar with. I have expanded on that below in order to make the point more clearly. - 30/11

MEASURES	CHILD PROTECTION	COVID-19
Published Risk Analysis and Mitigation Procedures	Child Safeguarding Statement	Re-opening Protocol (Including Case Action Plan)
Named member of the management team with reporting obligations	Designated Liaison Person - Any incidents reported to TUSLA	Health & Safety Officer - Any incidents reported to public health via HSE
Named member of the frontline team who consults with management on issues that arise but also mandated to report independently	Deputy Designated Liaison / Mandated Person gets training on how to discharge their duties in this addition to their role.	Lead Representative (A member of student support or academic team who gets training and time set aside for these duties)
Dissemination of relevant information to rest of staff	Training for all staff on what to look for, how to report and to who	Training for all on what to look for, how to report and to who.
Dissemination of relevant information to clients and students	Included in induction and handbook with specific procedures published on website	Included in induction + handbook with specific procedures published on the website + regular feedback collected.
Issues reported to / investigated by ...	TUSLA	HSA for workplace risks & HSE

LWR Role Description - 22/12



Suggested Role Description for Lead Worker Representative in ELE Context

- Be familiar with how the Work Safely Protocols is implemented in your school, the necessary cleaning and disinfection requirements for preventing the spread of COVID-19. help to check that suitable measures are in place.
 - Know how to prevent the virus from spreading, be familiar with procedures in your school and form part of the team that deals with suspected cases.
 - Keep up to date with the latest public health information and advice, including the signs and common symptoms of COVID-19 from the HSE.
 - Be available to other members of the team who have concerns about COVID-19 procedures and communicate these to the Health and Safety Officer as part of regular meetings or directly, where urgent.
 - Contribute to regular review and update of COVID safety procedures.
- NB: Should ideally be someone who has front line contact with students / clients.
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Extended Permissions How Many



24/1: I was given an undertaking at the meeting before last that we would get a number for how many ELE students were still in the country and are benefiting from visa extensions. It would really help to inform the discussion if we could have that number at this meeting. I think it would also be important to know what the discrepancy is between that number and the number reported as enrolled in a course of study.

ILEP 25/9: For international English Language Students, the extensions mean that they may continue to work in accordance with the standard criteria applicable for non-EEA students. Accordingly, they must re-enroll in a course of study to ensure they adhere to the conditions of their permission

January Letter from ILEP



At the most recent ELE working group meeting, the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) expressed its continued support for the sector. DFHERIS outlined the need for **a phased, incremental approach to the full re-opening of the sector safely** and reiterated that in the interim recruitment of international students is not to take place as outlined in their correspondence dated 18th August 2020.

Prospective students seeking to enter the State must **wait until in-person tuition has been resumed**. Students with existing bookings should postpone their travel plans until in-class tuition has resumed. Failure to do so may result in students being refused permission to land in Ireland and refused registration. As education providers we request that you bring this to the attention of prospective students. - 18/01

Other Points & What Next



What is a large or a small school and how should regulations differentiate?

QQI Quality Review of Online ELE Provision - Like the Higher Ed one

ILEP inspections to resume based on full-time in-person capacity

How many ELE Visa students in the country at present are potential renewals

Which department does ELE fall under? (DoE, DoJ, Tourism, DFHERIS)

When will we have the IEM?

Mandatory Quarantine and differentiated re-opening of travel

Living with COVID for how much longer
