

7. The CSI conducted consultations with the MEYS concerning the adoption of the amendment to **Decree No. 64/2005 Coll. on Recording Injuries of Children, Pupils and Students**. As early as in April 2008 the CSI addressed initial proposals to the MEYS for amendments with a view to removing some discrepancies and reducing the administrative burden (clarification of the term “absence” in school/school facility, abolition of the duty to forward all records on injuries; changes in terminology). The proposal drawn up by the MEYS on the basis of suggestions of the CSI was sent to the CSI in the school year 2009/2010 for their further comments. Some alterations were made mainly in the Annex to the Decree on the basis of comments of other authorities delivered within external consultations.
8. The CSI has for a long time been striving **to change the conditions of OHS in schools and school facilities** and, in order to achieve this, representatives of the CSI participated in meetings of the group authorised to draw up the relevant Decree.
9. In April 2010 the CSI conducted consultations on the basis of which they made comments concerning the proposal of the **FEP for Practical Schools** (both one-year and two-year practical schools). The CSI pointed out that neither of the FEPs unambiguously determines target groups and in addition specification of two fields of education and issuance of two separated FEPs appears to be unnecessary as there is an option for schools to specify, quite independently, the content of education and duration of studies. Furthermore, the CSI drew attention to discrepancies between the terminology in the Education Act and the FEPs in question.
10. In April 2010 the CSI drew up comments on the draft **FEP for Basic Schools of Music and Arts**. The CSI raised, in particular, objections against formulations stipulating only the “optimal” status without laying down the minimal required status. In addition, discrepancies between the terminology used in the draft FEP and the Education Act were underlined as they could substantially affect the content. (For example the draft FEP encompassed provisions specifying groups of pupils which are, however, not defined by any other education legislation, thus the target group is not clear).
11. In February 2010 the CSI drew up comments concerning the document “**Inclusion of Children Younger than Two Years in Kindergartens**”. The CSI concentrated mainly on insufficient financial, material and staffing conditions. On the basis of the document submitted to the Government a follow up analysis was drawn up including the comments of the CSI covering a range of areas incorporated. Despite this the CSI considers the inclusion of children under three years of age in the system of education and training, which must be stipulated by the Education Act, to be a non-systemic step which denies the educational and mainly training nature of pre-school education at the expense of care, for which the MEYS is not primarily responsible.
12. In November 2009 the CSI processed information on the course of enrolment proceedings in the school year 2009/2010 and submitted it to the MEYS. In this document the CSI highlighted some problems relating to the established system of enrolment proceedings in secondary schools, which are, *inter alia*, as follows:
 - a) as a consequence of the uncertainty of head teachers concerning the real number of students who will start to study 1st grades (out of pupils who were admitted) the number of positive decisions substantially exceeds the number of pupils who should be admitted;
 - b) aggregate costs of enrolment proceedings rose, according to estimations made by head teachers of the sample of 70 schools, by almost 70%.

In the course of the school year 2009/2010 the CSI, in addition to its inspection activities, initiated publication of explanatory communications relating to other areas of education legislation in order to unify the interpretation of legal provisions by different institutions and bodies in the Czech Republic.