

AMALGAMATION FOR STANDARDISATION PILOT

CONSIDERATION OF REQUEST FOR CHANGE

ST JAMES' PS NURSERY UNIT [DE REF 303-6100]

Background

On 12 October 2022 DE published Circular 2022/09 setting out terms of the "Amalgamation for Standardisation" pilot. The pilot is designed to facilitate the approval of changes to a grant-aided school's approved numbers and session length which may not require a Development Proposal (DP). The process is designed to facilitate change where there is evidence demonstrating an historical pattern of over provision within the setting and sufficient capacity in the surrounding area to continue to provide a funded pre-school education place for every target-aged child whose parents want it.

The key criteria for participation in the initial phase of the pilot is that a statutory pre-school must have had an actual enrolment of underage pupils of at least 15 or above in three out of the last five years using the latest census data available. Twelve statutory pre-schools were invited to participate in the initial pilot.

St James' PS Nursery Unit was invited to participate in the pilot and the Board of Governors of the school have requested:

THAT THE EXISTING STATUTORY NURSERY PROVISION AT ST JAMES PS NURSERY UNIT [DE REF 303-6100] WILL BE MODIFIED TO PROVIDE 52 FULL-TIME NURSERY PLACES ONLY WITH EFFECT FROM 1 SEPTEMBER 2023 OR AS SOON AS POSSIBLE THEREAFTER.

The Board of Governors of St James' PS Nursery Unit have requested that the above change be made under the Amalgamation for Standardisation Pilot Programme. In making this request, the BoG have confirmed they understand that the request is subject to approval, but if approved, will be made on a permanent basis.

The BoG have further confirmed that the proposed change is deliverable within the existing provision available in the statutory pre-school setting and not dependent on any new capital or other investment. It is the view of the Board of Governors that the requested provision is sustainable. ¹

The impact of the proposed change, if approved, would be to reduce the enrolment figure for the school by 52 part time pre-school places, and increase it by 26 full time pre-school places from September 2023 or a soon as possible thereafter.

¹ ED1/22/284022

Background

The former Minister for Education, Michelle McIlveen, determined that funded pre-school education provision should be standardised to offer at least 22.5 hours education per week in the year before compulsory education. The intention for standardisation was first indicated in Learning to Learn (2013) and is in line with the Fair Start (2022) action that “DE should standardise the length of pre-school education day to at least 4.5 hours per day, including access to free school meals for eligible children, thereby improving equality of provision” and the New Decade New Approach Deal (NDNA) commitment that “The Executive will publish a Childcare Strategy and will give immediate priority to developing arrangements to deliver extended, affordable, responsive, high quality provision of early education and care initiatives for families with children aged 3-4.”

The standardisation of funded pre-school education provision will be subject to Executive approval and funding, and will be informed by detailed engagement with the pre-school sector including via a Scoping Study due to be commissioned in early 2023. The ‘Amalgamation for Standardisation’ pilot will provide an important opportunity to trial mechanisms to facilitate transformation to a longer session length in some settings to help inform wider decisions and planning for a standardised preschool session length.

The Education (NI) Order 1998 allows the Department, at any time, to make changes to a pre-school’s full time and/or part time enrolment numbers. The key legislative provisions are Articles 25(4) and Article 29(4). The Department sets these numbers for each school in consultation with Boards of Governors, the EA and where relevant, CCMS.

The ‘Amalgamation for Standardisation’ pilot process will facilitate the approval of decreases to a pre-school’s approved numbers and a change of session length from part time to full time which reflect an established trend of over provision in the setting. The aim and objective are intended to better match the supply of funded pre-school education places to the level and pattern of demand, taking into account the future policy direction of pre-school education provision in terms of session length and minimising the administrative burden and creating capacity for all concerned to focus on more strategic matters.

Every funded pre-school education provider is an important part of the network of settings that make up the education system which caters for the needs and aspirations of all children and parents in an area. Any change to an existing preschool provider must therefore be considered in the wider context of provision in the area.

‘Amalgamation for Standardisation’ involves looking at a statutory preschool’s current and historical pattern of enrolment; and gathering and analysing evidence from the pre-schools concerned and other pre-schools in the wider area to determine how its enrolment numbers should be treated in accordance with existing legislative frameworks

Background to the school

St James' PS NU is a Maintained primary school with a statutory nursery unit located on Fernagh Road, Newtownabbey. The nursery unit has an approved admissions number of 52 part time pre-school pupils and 26 full-time pre-school pupils.

In 2021/22, there was an actual enrolment of 78 pre-school pupils. There were no pupils with a statement of Special Educational Needs (SEN) and no pupils with SEN without a statement. There were 25 (32% approved admissions number) underage (penultimate pre-school age) pupils enrolled in the school. The enrolment pattern over the last five years for which census data is available is attached at Tab A.

Area context

The school is located within the Monkstown 2 Super Output Area (SOA). On the Northern Ireland Multiple Deprivation Measure 2017 Monkstown 2 is ranked 462 out of 890 (with 1 being most deprived and 890 least deprived).

In determining the need for pre-school education provision the Department generally assumes a level of provision at 95% of target aged children. In areas such as Newtownabbey, the current level of pre-school education provision within a five-mile radius of the school is used as an indicator of current capacity to meet need for pre-school education provision and is considered alongside other factors such as population projections to determine the likely future need for additional pre-school education provision in the area.

Within a five mile radius, there are currently 44 funded pre-school education providers (listed at Tab C). Together these settings provided 1,675 funded pre-school places in the 2022-23 academic year, with a capacity to provide a 66 further places if required. Of the funded places provided, 145 were provided to underage (penultimate) pupils. There were also 65 vacant places within funded pre-school settings.¹

Within the five mile radius, 1,561 first preference applications were received from target aged pupils for the 2022-23 academic year. This sets current pre-school provision in the area at c.111%, well above the planning figure.

A PEG analysis (Tab B) of NISRA live birth statistics by District Council area shows for the 2022-23 academic year in Northern Ireland:

- A further decline of 342 target aged children.
- Six of the eleven District Council areas in excess of 100 % pre-school provision (based on current provision); and

For the 2023-24 academic year:

- significant decline in live births for Northern Ireland by 796 children

¹ EA figure as at 3 November 2022

- Ten of the eleven District Council areas will have in excess of 100 % preschool provision (based on current provision).

Within a 5 mile radius of St James' PS NU, EA PEG has advised that as of 3 November 2022, there are:

- 145 penultimate aged pupils in funded pre-school education places
- 65 Vacant places in funded pre-school settings (44 in statutory settings)
- 66 places potential additional capacity within existing PSEP providers

NISRA figures predict a population decline of 177 (10%) target age children (aged 3) for the Antrim & Newtownabbey LGD from 1,698 in 2021 to 1,521 in 2034.

If approved, the proposed change is therefore unlikely to have a detrimental impact on the ability of target-aged children accessing a funded pre-school education place in a setting of their preference and would increase the availability of full time pre-school places in the area. The reduced provision available would still be above the planning figure.

Policy context

The Department aims to ensure that at least one year of pre-school education is available for every target age child whose family wants it. It is also the Department's practice, where possible, not to displace good quality pre-school education provision already in existence with pre-school education provision in an alternative setting.

As set out above, the former Minister for Education, Michelle McIlveen, determined that funded pre-school education provision should be standardised to offer at least 22.5 hours education per week in the year before compulsory education. The intention to standardise was first indicated in Learning to Learn (2013) and is in line with the Fair Start action that "DE should standardise the length of pre-school education day to at least 4.5 hours per day, including access to free school meals for eligible children, thereby improving equality of provision" and the New Decade New Approach Deal (NDNA) commitment that "The Executive will publish a Childcare Strategy and will give immediate priority to developing arrangements to deliver extended, affordable, responsive, high quality provision of early education and care initiatives for families with children aged 3-4."

The Department's Learning to Learn Policy (A Framework for Early Years Education and Learning, published on 7 October 2013) has, among its key actions, placed a moratorium on any new or additional full-time provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it. The Amalgamation for Standardisation pilot provides an exception to the current moratorium, by facilitating new or additional full time pre-school provision in eligible schools where two or more part time pre-school classes are amalgamated.

This exception provides the opportunity for schools to normalise their admissions and enrolment numbers in line with the changing population and patterns of demand, and taking into account the wider context of pre-school standardisation.

Learning to Learn and Fair Start also included clear actions to focus the PSEP on target aged children, removing younger from the programme and directing them towards age and stage appropriate provision. Removal of all penultimate children from the PSEP would require a change to primary legislation, and it is the intention that this will be progressed in due course and will be linked to progress on the wider Early Learning and Childcare Strategy and in particular, progress on the development of a programme for two-year-olds.

In the meantime, facilitating changes to admissions numbers for pre-school settings with large numbers of younger pupils will help to ensure that limited resources are focussed on target aged pre-school children.

First preference applications

It is possible with any change from part time provision to full time provision that parents may place the setting at a higher preference in their pre-school application than they may have done had the setting continued to provide part-time provision. However, St James' PS NU received 57 first preference applications from target age children for the 2022/23 academic year, which is five more than the total number of places the pre-school proposes to provide in future years. Given that the intention is for all pre-school settings to move to full time provision over time, and the fact that the current proposal is coupled with a decrease in pupil numbers, it is not considered that any change in parental preference is likely to have a significant or sustained impact on other settings in the area. The proposed admissions number is in line with the current pattern of enrolment of target aged children, so it is unlikely that target aged children who would have otherwise been accommodated at the pre-school would be displaced as a result of the proposed change.

Statutory Considerations

Under Article 64 of the Education Reform (NI) Order 1989, the Department has a statutory duty to 'encourage and facilitate the development of integrated education'. The Integrated Education Act (NI) 2022 extends this to also include a duty to 'support' integrated education, including aiming to meet demand for integrated education within the context of area planning and the overall sustainability of the school estate (including examining evidence of expected future demand). These duties must be considered alongside other legislative duties, including the duty under Article 44 of the Education and Libraries (NI) Order 1986 (the Department and boards shall have regard to the general principle that, so far as is compatible with the provision of efficient instruction and training and the avoidance of unreasonable public expenditure, pupils shall be educated in accordance with the wishes of their parents).

All funded pre-school education settings regardless of location and management type are accessible to children from all backgrounds and are subject to the same inspection standards. All pre-school education settings follow the same curricular guidance the broad framework of which ensures equality of opportunity, pointing to staff acknowledging and respecting the culture, beliefs and lifestyles of the families of all children. However, it is acknowledged that parents state preferences for pre-school education provision taking into account a wide range of factors, and in some cases parents may have a preference for pre-school education in schools with a particular management type, including an integrated management type, and this is taken into account in the EYT advice.

Irish Medium and Integrated Education in the area

There are four pre-school education settings with an integrated management type within the local area, Cliftonville IPS NU; Hazelwood IPS NU; Brefne Integrated NS' and Glengormley IPS Playgroup. Cliftonville, Hazelwood and Brefne provide 26, 52 and 26 full-time pre-school places respectively for the 2022-23 academic year and received a total of 134 first preference applications in the 2022-23 pre-school admissions process. Glengormley IPS Playgroup provides 33 part-time pre-school places and received 33 first preference applications for the 2022-23 academic year.

Each of the settings above have been fully subscribed in each of the last 3 years.

As the proposal in respect of St James' PS NU combines a change in session length with a reduction in pupil numbers to address over provision, if approved it is not expected that it would have a detrimental impact on current pre-school provision at these settings.

Under Article 89 of the Education (Northern Ireland) Order 1989 the Department has a statutory duty to encourage and facilitate the development of Irish-medium Education. Registered Irish-medium providers with sufficient children can be funded under the Department's Pre-School Education Programme even where English-medium provision is available in the area.

There are two Irish-medium pre-school education setting within the five mile radius, Naiscoil Eanna PS NU and Naiscoil Bheann Mhadagain PS NU which together provided a total of 53 funded pre-school places in 2022-23, year and received a total of 60 first preference applications in the 2022-23 pre-school admissions process.

As the proposal in respect of St James' PS NU combines a change in session length with a reduction in pupils numbers to address over provision, if approved it is not expected that it would have a detrimental impact on current pre-school provision at any of these settings.

Effective and Efficient Use of Public Funds

The Department of Education (the Department) must be mindful of its duty under Article 44 of the Education and Libraries (NI) Order and under Managing Public Money to ensure effective and efficient use of public funds.

While recognising the positive work of the EA in planning funded pre-school education provision and matching it to an ever-changing pattern of demand, there is evidence of over provision in some statutory pre-schools which is incompatible with the best use of limited resources and the best interests of target aged children in the area. The Education Authority Pre-School Education Group (EA PEG) Planning report (December 2021) set out that during the 2021- 22 academic year, some 1,223 penultimate aged children accessed a funded pre-school education place in a statutory setting, almost 300 more than the previous year. This is contrary to the aims set out in the Fair Start Report which included an action that DE should "... focus attention on age-appropriate preschool education" and is an indicator of potential over provision in the local area.

As the proposal involves amalgamation of 52 part time places into 26 full time places, if approved there will be a small reduction to the CFF budget requirement in the pre-school.

Financial Implications

As the proposal involves amalgamation of 52 part time places into 26 full time places, if approved there will be a reduction to the CFF budget requirement in respect of the pre-school setting. Under the terms of the pilot, no additional funding, including capital or minor works or equipment will be provided. In making a request for a change under the pilot, the school has confirmed that the requested changes are achievable without any additional investment.

The Board of Governors have confirmed that the proposed change is deliverable within the existing provision available in the setting and not dependent on any new capital or other investment, It has also stated that the requested provision is sustainable.

Based on the 2022-23 Common Funding Formula (CFF), the difference in Age Weighted Pupil Unit (AWPU) funding between 52 part time pupils and 26 full-time pupils in the nursery unit I is detailed in the Table 1 below:

Table 1

	AWPU funding for two part-time classes (52 Pupil)s	AWPU funding for one Full-Time Class (26 Pupils)	Variance in funding
	£'000	£'000	£'000
Nursery Unit	110	83	(27)

Whilst the school would have fewer pupils and therefore should experience a reduction in some costs (such as consumable educational resources for pupils), it is likely that most costs, particularly in regard to staffing, accommodation and utilities,

are unlikely to change significantly in the short term. That is, in the short term, the reduction in costs are unlikely to be at the same level as the reduction in AWPU funding set out at Table 1 and this could lead to some short term pressures, despite the assertions of Boards of Governors, and could impact on the financial position of the school. However, given the pattern of enrolment of penultimate aged pupils in the school and the Department's intention to legislate to remove such pupils from funded pre-school provision, it is unlikely that the current provision would be financially sustainable in the longer term. The school's provisional Surplus position as at 31 March 2022 is £183,683.

There is likely to be a small increase in demand on the budget in relation to pupils entitled to Free School meals. This is because school meals are not available in part time pre-school provision but are available in full time provision. However, given the small numbers involved (26 new full time places and an average of 42%³ pre-school pupils uptake of free school meals), the level of additional demand is considered to be negligible, at circa 11 additional children if the proposed change is approved.

Sustainability assessment

Schools for the Future: A Policy for Sustainable Schools (SSP) does not apply to preschool provision and as St James' NS is a standalone school no sustainability assessment is required.

Below are some key points in relation to the St James' PS NU.

- The school has had no vacant pre-school places in any of the last five years.
- However, the school has enrolled penultimate pre-school aged pupils in each of the last five academic years for which census data is available. The number of penultimate aged pupils enrolled in each of the last five years were 25; 24; 16; 21; and 25 respectively
- The Board of Governors has confirmed that the school has adequate accommodation and no capital or other investment is required to facilitate the proposed change.
- The proposed change would see a reduction in the CFF allocation to the school. The Board of Governors has confirmed that it considers this change is sustainable.
- The school's provisional Surplus position as at 31 March 2022 is £183,683.

The Education and Training Inspectorate (ETI) published an inspection of the school in April 2016 and concluded that "the quality of education provided by this primary school and nursery unit is good". The report added that in the nursery unit most of the children are developing effective social skills and friendships as they play together in pairs and small groups. It further added that the children's educational programme is well balanced providing good opportunities for learning across all areas of the pre-school curriculum and concluded that St James' PS & NS has a capacity to identify and bring about improvement in the interest of all learners.

³ Based on Nursery school FSM claims [School Meals Tables for 202021.XLSX \(live.com\)](#)

Consultation

In line with the legislative requirement at Articles 25 and Article 29 of the Education (NI) Order 1998, the Department has consulted with the planning authorities, managing authorities, Trustees and sectoral support bodies of the schools identified and the Boards of Governors of the pre-schools themselves as well as all funded pre-school settings in the surrounding area. This enabled these bodies to put forward their views and evidence as to whether the school should be part of the process and the proposed change approved.

The purpose of the consultation was to advise of the proposed decrease and change of session length, to identify any implications arising from it and to give an opportunity to consultees to express their views which will then be used to inform the decision on the proposal. Those consulted were asked to provide information, evidence and reasons as to why a decrease to the pre-school's approved numbers and change to the session length should be facilitated or not.

Officials have examined all evidence and information received, and while there have been some comments made in regard to the desire of other settings to be considered for a similar opportunity through the pilot, no substantive objections to the proposal were received. One response was received from a pre-school in the vicinity St James's PS NU, which specifically referenced the proposed change at that setting. While this response indicated support for a full time pre-school place for every child, it raised concerns with regard to potential funding shortfalls if settings cannot accept pre-pre-school children. The response also set out the need for accommodation needs to be assessed in all pre-school provision, which is the intention under the Scoping exercise planned for 2023. The response acknowledged that the proposed change may lead to a change in first preference applications in the area (with the likelihood that parents would prefer full time provision) but did not object to the proposed change.

On the whole all of the sectoral bodies consulted were supportive of the pilot and the proposals for standardisation. There were some concerns raised over the timing of the pilot and the speed at which it is being implemented, resulting in the schools being invited to participate having limited time to consider the full ramifications of the proposed changes to their setting. NICIE and CnaG also raised some concerns about the potential impact on other integrated or IM settings in the areas of the schools invited to participate.

Further details of each of the responses received from sectoral bodies and other pre-school settings in the area are attached at Tab D.

Rationale for change

The rationale for the proposed change is set out in detail during this paper and is summarized below

- St James's PS NU is a good existing provider of pre-school education in the area
- The school has enrolled at least 15 penultimate aged pupils in at least 3 of the last 5 academic years

- NISRA statistics indicate a reduction in the birth rate in the area in between 2021 and 2034.
- The Board of Governors have advised that a change to the enrolment figures for the school as requested would be in the best interests of pre-school children in the area and is achievable within existing provision
- The Board of Governors have advised that the proposed change is sustainable
- The EA has advised that the proposed change can be implemented while continuing to ensure there is sufficient provision in the area to provide a funded pre-school place for every target aged child whose parents want it and this is supported by the enrolment and NISRA data as set out within this advice.
- Implementation of the proposed change would contribute towards the overarching aim of a standardized session length for all pre-school pupils

Method of approval

The Education (NI) Order 1998 allows the Department, at any time, to make changes to a pre-school's full time and/or part time enrolment numbers. The key legislative provisions are Articles 25(4) and Article 29(4). The Department sets these numbers for each school in consultation with Boards of Governors, the EA and where relevant, CCMS.

The legislation covering Development Proposals (DPs), meanwhile, states that a DP should be brought forward for grant-aided schools (this applies to grant-aided nursery, primary, post-primary and special schools) in the following circumstances:-

- i. to establish a new grant-aided school;
- ii. to amend the status of an existing grant-aided school;
- iii. to discontinue an existing grant-aided school;
- iv. to make a significant change in the character or size of a grant-aided school; and
- v. to make any other change in a school which would have a significant effect on another grant-aided school

The threshold assessment of 'significance' may be determined by reference to the operation of the Department's education policies and the likelihood that the school(s) in question or other schools may be impaired from compliance in a manner which the Department regards as significant. Any dispute as to whether a change is a significant change or would have a significant effect on another grant-aided school shall be determined by the Department.

Officials have examined all evidence and information received in relation to the proposal and taken into consideration relevant Departmental policies and legislation. On balance, it is our assessment that the proposed change is not

'significant' in that it is simply proposing the adjustment of admissions figures in light of established trends in the school and surrounding area and facilitating a change to session length that is intended to be rolled out for all settings in due course. As set out above, the proposed change is also unlikely to have a significant effect on another grant-aided school. It is therefore the view of officials that the approved decrease and session change should be considered for approval under Articles 25 and Article 29 of the Education (NI) Order 1998, not via the DP process.

Recommendation

Taking into account all of the evidence and information provided it is recommended that you:

- (i) Agree that the proposed change is suitable to be considered under the 'Amalgamation for Standardisation' pilot and processed under Articles 25 and Article 29 of the Education (NI) Order 1998.
- (ii) Approve the proposal under the terms of the Amalgamation for Standardisation pilot that: **"THAT THE EXISTING STATUTORY NURSERY PROVISION AT ST JAMES' PS NU [DE REF 303-6100] WILL BE MODIFIED TO PROVIDE 52 FULL-TIME NURSERY PLACES ONLY WITH EFFECT FROM 1 SEPTEMBER 2023 OR AS SOON AS POSSIBLE THEREAFTER."**; and
- (iii) Agree that this advice (with appropriate redactions) will be published on the Department's website once the EA and the school have been informed of your decision.

Tab A**Enrolment Data**

St James' PS NU (DE ref 303-6100)

	Academic Year				
Academic year	21-22	20-21	19-20	18-19	17-18
Penultimate pupils	25	24	16	21	25
Total pupils	78	79	78	78	78

Source: DE census

Tab B

A PEG analysis of NISRA live birth statistics by District Council area shows:

For the 2022-23 academic year:

- A further decline of 342 target aged children.
- Six of the eleven District Council areas in excess of 100 % pre-school provision (based on current provision).

For the 2023-24 academic year:

- significant decline in live births for Northern Ireland by 796 children
- Ten of the eleven District Council areas will have in excess of 100 % preschool provision (based on current provision).

Births by Academic Year	PRE-SCHOOL 2023		
	Live Births 2019	Increase/Decrease on Live Births on previous year	% Pre-school Provision for Sept 2023
LGD2014			
Antrim and Newtownabbey	1630	-7	101.60
Ards and North Down	1488	-61	103.76
Armagh City, Banbridge and Craigavon	2664	-113	100.83
Belfast	4056	-182	101.85
Causeway Coast and Glens	1502	-56	107.06
Derry City and Strabane	1805	-80	113.19
Fermanagh and Omagh	1390	-23	109.86
Lisburn and Castlereagh	1697	-75	103.83
Mid and East Antrim	1396	-35	111.10
Mid Ulster	2053	19	103.99

Source: NISRA Demographic Statistics

PROJECTED LIVE BIRTHS vs EXISTING PRE-SCHOOL PROVISION



Current NISRA population statistics for Antrim & Newtownabbey LGD:

	2018	2019	2020	2021	2022	2023	2024	2025
Age	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS
3	1791	1844	1726	1698	1675	1650	1635	1618
	2026	2027	2028	2029	2030	2031	2032	2033
	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS	PERSONS
	1603	1592	1582	1571	1558	1546	1536	1521

Funded pre-school settings within 2 miles

3036100	St James' PSNU, Newtownabbey (FT)
3036100	St James' PSNU, Newtownabbey (PT)
3BB0654	Hollybank Pre-School PG [Monkstown]
3116219	Monkstown Nursery School FT
3116219	Monkstown Nursery School PT
3010827	Whitehouse PS NU
3010895	Rathcoole PS NU
3AB0092	Newtownabbey Methodist Mission Pre School PG
3BB0246	St MacNissi's Pre School Centre PG
3116214	Ashgrove Nursery School FT
3116214	Ashgrove Nursery School PT
3033313	St Bernard's PS NU
3BB0247	St Mary's on the Hill PG
3AB0258	St Bernard's Pre School PG
3016005	Silverstream PS NU
1066531	Hazelwood Integrated PS NU
3116162	Mossley Nursery School FT
3116162	Mossley Nursery School PT
3BB0094	Glengormley IPS PG
3AB0353	Alphabet PG [Greenisland]
3016249	Earlview PS NU
1136229	St Mary's Nursery School [Newtownabbey]
1AB0425	Stepping Stones Pre-School PG [Belfast]
3116166	Ballyhenry Nursery School
3013323	Mossgrove PS NU
3046685	Naiscoil Eanna PS NU [Glengormley]
1016537	Lowwood PS NU [Belfast]
1110028	Brefne Integrated Nursery School [Belfast]
1CA0622	TLC Nursery PG [Belfast]
1010266	Seaview PS NU [Belfast]
3CA0588	Greendale Day Nursery PG [Newtownabbey]
1016076	Ballysillian PS NU
1136251	Our Lady's Nursery School (Deanby) (Belfast)
3CA0643	Primrose Hill Day Nursery PG [Ballyclare]
1010063	Currie PS NU [Belfast]
1056483	Cliftonville Integrated PS NU [Belfast]
1036566	Holy Family PS NU [Belfast]
1046596	Naiscoil Bheann Mhadagain PS NU [Belfast]
1116159	Oldpark Nursery School [Belfast]
1110007	Ligoniel Primary School Nursery Unity

1016532	Wheatfield PS NU [Belfast]
1036042	St Vincent de Paul PS NU
1BB0013	Play and Learn PG [Belfast]
1116074	Glendu Nursery School [Belfast]
1110036	New Lodge Nursesry School [Belfast]
1116011	Victoria Nursery School [Belfast]
1136360	Holy Cross Nursery School [Belfast]
3116150	Sunnyland Nursery School [Carrickfergus] PT

Consultation

Summary of Responses from Sectoral Bodies

Education Authority

- In the context of declining birth rate, and consequent increased uptake of funded Pre-School Education Programme pre-school places by penultimate aged children, the EA broadly welcomes the opportunity for some pre-school settings to voluntarily participate in the pilot programme.
- Note schools have now been invited to participate in the pilot, therefore, would request that Boards of Governors be given sufficient time to consider the impact participation may have on their school, particularly in regard to staffing, finance and catering.
- In regard to potential impact on specific areas, would like to draw your attention to the effect the pilot may have in the Omagh area in regard to a reduction in 52 funded places within the controlled school sector and the potential impact this may have on one side of the community. Wider consultation with the local community may be required in that area.
- Would welcome close collaboration with the EA in regard to any potential impact the pilot programme may have on the delivery of the Pre-school Education Programme.
- The EA also welcomes the opportunity for nursery school principals in the pilot settings to avail of principal release time.

CCMS

- Move to full-time excellent step forward;
- Beneficial to have adopted a more balanced approach to ensuring the inclusion of a representative sample of schools from across all sectors in the pilot;
- Period and announcement was very fast and element of pressure on schools in having to make a decision on accepting to go on the Pilot with little time to investigate the consequences this might have for the school.
- Not enough clarity set out in terms of how a school should reorganise moving from a two dual day system to a dual day and 1 full time day system for September for Boards of Governors to make an informed decision.
- If schools opt in for the Pilot, then they are stating that they do not require capital, but there is also an expectation that they will not require it in the future and this was not made clear enough in the documentation.
- There is a significant financial impact for schools, not only in terms of the allocated budget but also given that the overall size of the school will be reduced and therefore the band, which the school Principal is placed within for Pay scales, may also be reduced.

- While the CCMS schools involved in the pilot do not have a Nursery Principal, Nursery Principal release is crucial for the implementation of this programme in the future.

CSSC

- CSSC notes the potential for this pilot to partly address the number of penultimate age children in the system but is conscious that to achieve full standardisation across the Pre-school Education Programme will require significant resources and the pace of change will be slow and will take a considerable period of time.
- While the pilot presents many opportunities the move is certainly not without its challenges for the sector.
- The timing of the pilot has surprised controlled schools.
- To consider the implications for each setting is a considerable task, which requires the support of governors, and scheduling meetings to ensure that the implications of amalgamation are explored and understood by all. The preparation of a considered response by 11 November 2022 to this unexpected pilot has been communicated by some schools as a particular challenge.
- Controlled schools also highlighted the difficulties in giving due consideration to participation in the pilot when the expectation is that settings will submit admissions criteria to the Education Authority by 16 November 2022.
- CSSC had anticipated a survey assessing the readiness of the sector ahead of any actual move to standardisation and had expected the survey to issue this Autumn. CSSC had no prior knowledge of the intention to progress a pilot.
- CSSC anticipates and hopes that the scoping survey which DE will progress will better inform progress towards standardisation for all settings and that there will be learning from the arrangements for and implementation of this pilot.
- CSSC welcomes the Department's intention to engage directly with schools to consider the implications for each individual setting in terms of budget, staffing, accommodation and other relevant issues.
- While CSSC understands the criteria used to decide on the 12 schools invited to participate in the pilot, CSSC believes that a scoping survey of school readiness would have provided DE with more detailed information which could have led to the identification of a cohort of schools better placed to implement the amalgamation of part-time classes.
- CSSC is aware of settings which are enthusiastic about the pilot but will be unable to progress to implementing the pilot aims because of capital investment requirements.
- While CSSC notes and understands the current economic context and the pressures on the education budget it is nevertheless disappointing that settings' participation in the pilot cannot be facilitated through some investment.

- CSSC notes concerns that the amalgamation of part-time classes to full-time will lead to a reduction in the AWPU for participating schools and that this will potentially have implications for staffing.
- CSSC has expressed concerns about controlled schools being invited to participate in the pilot in areas for which new pre-school provision is proposed as outlined in Operational Plan 1.
- CSSC confirms its support for the standardisation of pre-school session times to 4.5 hours based on research which demonstrates the positive impact of full-time provision on the personal development and educational outcomes of children in the early years.
- CSSC welcomes the intention to progress a scoping survey (in December 2022/January 2023) which will assess the readiness of the wider sector to move to full-time provision and which will support DE in engaging with the sector to inform the move to ensuring full-time provision for all during their pre-school year.

CnaG

- To ensure maximum exposure to the 'target' language and in line with best practice in immersion methodology, a sufficient period of time in an Irish immersion early years context is essential.
- This ensures a solid linguistic foundation from which children will continue on their Irish immersion journey.
- Standardising session times will, without a doubt, massively impact upon the IM voluntary pre-school sector, and equally will have a significant impact on rural pre-school settings-both IM & EM.
- There are implications for settings that deliver an additional year of an early years immersion experience; some settings that currently offer this will no longer be able to due to financial/tenancy/staffing constraints, which will impact negatively on language acquisition in immersion settings.
- 25% of voluntary IM pre-school settings are located in shared premises, therefore in order for them to provide an extended standardised session, an adjustment in tenancy agreements would be needed, however this may not be achievable.
- IM pre-schools based in shared venues in rural areas are in those shared spaces; finding alternative facilities would be a huge challenge.
- The extended hours will also involve additional insurance costs, staffing costs and other running costs.
- The expectation of the provision of meals will also be problematic as many settings will struggle to comply with HSCT & EH requirements in terms of the provision for and distribution of food.
- An additional challenge facing the IM pre-school sector with regards to staffing capacity, is availability of staff to work extended hours in the preschool, while also staffing IM SureStart Developmental Programmes for 2-3 Year olds and the pre-preschool immersion sessions.
- Compliance with the proposed standardisation of session times will therefore require significant planning, with an adequate implementation timeframe, as

well as considerable investment in the infrastructure of voluntary IM pre-school provision.

NICIE

- Overall, NICIE welcomes this Circular and Pilot as we have highlighted the issue of underage children in a paper in 2019.
- Of the 12 pilot schools mentioned, the presence of large numbers of underage children in seven of these settings has impacted upon recent and planned Development Proposals for Nursery Units in neighbouring Integrated Primary Schools.
- In all, six GMI and CI schools either have been affected or stand to be impacted by this issue in seven of the pilot schools.
- NICIE would contend that the removal of places from Nursery Units and Schools which have not been to fill them with target age children makes sense for the children, as the Curriculum is not appropriate.
- We would be concerned that as this is a voluntary process and may not deliver the expected reduction in places in these settings, and that this may in turn act as a barrier against the development of sustainable Integrated schools in these areas.
- NICIE would ask that the demand assessment contained in Article 5 of the Integrated Education Act 2022 which has now come into force is adhered to.
- Considering this change in the law NICIE would expect to see places allocated to the Integrated pre-school settings being commensurate with the demand for those places and not reduced because of undersubscribed settings in other school sectors.

Summary of responses from pre-school education providers specifically referencing this proposed change:

Following response received from [REDACTED]

I believe that ethically every child needs a full time place in a Nursery to fully support their transition to Primary 1. However I worry about the funding shortfall if we cannot accept pre pre-school children. Also I feel the accommodation needs to be assessed in all Nursery Units. Our Nursery Unit is not fit for purpose and representatives from DENI have informed us that there is no money to give us any form of upgrade. Obviously a full day of Nursery in a local school will put further pressure on us to fill our places as first preferences will go to St. James's.