

DP 664 ENNISKILLEN INTEGRATED PRIMARY SCHOOL - APPENDICES

- **Appendix A - Copy of Published DP 664**
- **Appendix B - Case for Change for DP 664**
- **Appendix C – Statutory DP Process:**
 - Summary of Responses received during the Two Month Objection Period;
 - NICIE Commentary;
 - CSSC response; and
 - Note of the Meeting with Representatives of Jones Memorial PS.

- **Appendix D - Education and Training Inspectorate Comments**
- **Appendix E - DE (Policy Team) Comments**
- **Appendix F: Integrated Education Act (NI) 2022 – Additional Supplementary Information**

EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL No 664

ENNISKILLEN INTEGRATED PRIMARY SCHOOL

Notice is hereby given that a proposal, under Article 79 of the Education Reform (Northern Ireland) Order 1989, has been submitted to the Education Authority by the Board of Governors of Enniskillen Integrated Primary School to the effect that:

Pre-school provision is expanded at Enniskillen Integrated Primary School through the establishment of a single pre-school afternoon session to provide 26 part-time places with effect from 1 September 2022, or as soon as possible thereafter.

A copy of the Proposal and Case for Change may be inspected at the offices of the Education Authority, 1 Hospital Road, Omagh, BT79 0AW, between the hours of 9.00 am and 4.30 pm and www.eani.org.uk/school-management/area-planning.

Any objections or support to this Proposal should be lodged with the Area Planning Policy Team, Department of Education, Rathgael House, Balloo Road, Bangor, Co Down, BT19 7PR or emailed to dps@education-ni.gov.uk within two months of the date of publication of this notice. Any letters of objection or support may be published on the Department of Education's website, with appropriate redactions, if they are included in full in the submission on which the outcome of the proposal is decided.

The Department of Education and the Education Authority operate a regime of openness under the Freedom of Information Act. Letters of objection and information supplied to the Department of Education and the Education Authority may be subject to disclosure under the Freedom of Information Act, if requested. (A fee may be charged for supplying this information.)

Sara Long
Chief Executive


CASE FOR CHANGE – Supporting Information


SUMMARY/OVERVIEW

AREA PLANNING DISTRICT	Fermanagh and Omagh (LGD)
DP NUMBER	664
PROPOSER	Board of Governors of Enniskillen Integrated Primary School Contact: Adele Kerr, Principal 02866 326799 E-mail: akerr250@c2kni.net
SCHOOL NAME	Enniskillen Integrated Primary School and Nursery Unit
SCHOOL REFERENCE	206-6549
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	Week Commencing 27 September 2021
PROPOSAL	A statutory afternoon nursery session will be established at Enniskillen Integrated Primary School for 26 children (Part-time) within the existing nursery unit with effect from 1 September 2022, or as soon as possible thereafter.

STATUTORY CONSULTATION

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

<p>PROPOSER</p> <p>Provide detail of consultation with the Board of Governors, teachers and parents of the affected school(s) – dates of meetings / letters. Good practice suggests all staff (including non-teaching) should be consulted as well as pupils.</p> <p>Summary and assessment of views received – how were these considered before publication of the DP?</p>	<p>BOG – May 2020 This Development Proposal has remained on The Board of Governors’ Matters Arising grid since 2014. The Board of Governors of this school fully support resubmitting this Case for Change again as they unanimously agree in the strength of this proposal. May 2020 the Case for Change submission was formally recorded in the minutes.</p> <p>This Development Proposal was consulted on again with The Board of Governors on 23rd November 2020 and received full support.</p> <p>Staff – (Teaching and Non-teaching) – May 2020 Due to COVID-19 the staff of this school were officially consulted via email and zoom to ensure their wishes were formally recorded. However, the staff of this school have been aware of the school’s desire to resubmit this Case for Change and are 100% supportive of it.</p> <p>100% support was received in December 2020 when staff consulted again.</p> <p>Parents – June 2020 Due to COVID-19 the parents of this school were officially consulted via text and asked to respond via email to ensure their wishes were formally recorded. There was an overwhelming response to this consultation with the overriding concern from parents with siblings still to apply over the years was the lack of available spaces in our Nursery Unit.</p> <p>Parents in this school were consulted again in December 2020 and no opposition was recorded with full support given.</p> <p>Signed Adele Kerr  Date 18th March 2021 _____</p>
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CONFIRMATION BY THE PROPOSER	<p>I confirm that the school Board of Governors, staff and parents of pupils were consulted on and Equality Screening of the proposal has been carried out and the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate have been considered.</p> <p>Name Neil Jardine Office held: Chair to The Board of Governors</p>  <p>Signed Date 18.03.21</p>

ASSOCIATED PROPOSALS : N/A


Case for Change: Statutory Consultation

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

The following is to be completed and signed off by the EA.

The Education Authority (EA)

I confirm that the schools which the Education Authority consider might be impacted by this proposal were consulted on 5 May 2021 with a return date of 3 June 2021.

Name:	Michele Corkey
Office Held:	Director of Education
Signed:	
Date:	16 September 2021

Provide detail of consultation with schools that may, in the EA's opinion, be affected by the proposal - list of schools, dates of letters issued to schools/meetings.

In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 5 May 2021 to schools which, in the opinion of the Education Authority, might be affected by the proposal. A total of 21 local schools which might be affected by the proposal were forwarded correspondence. Comments were invited from the Boards of Governors and Trustees, to be returned to the Education Authority by 3 June 2021.

Summary of views received (number of responses, recurring themes, petitions, community support or opposition).

Five responses were received from affected schools, one response was received from a local politician and one response was also received from the Controlled Schools' Support Council. A summary of responses and recurring themes are provided below:

Responses/Assurances in respect of issues raised during consultation.

Dates of EA meetings e.g. Education Committee/ Board etc.

Details of issues raised by members of EA Board

Enniskillen NS, Enniskillen Model PS, Holy Trinity PS, Jones Memorial PS - Do not support the proposal

- Supportive of 'integrated' education and take great pride in governing what is in essence a very integrated and inclusive school, as verified by its pupil, parent and staff population.
- Keen that much cognisance is given to the uniqueness of this area.
- The increase in provision is not warranted as it would adversely affect current provision in the area.
- There is over-provision of pre-school provision at present. Providing additional places, when a decrease is projected in the 0-4 age group, will impact negatively on the sustainability of existing pre-school provision and is an ineffective and inefficient use of public money.
- Some pupils attending Enniskillen Nursery School in the morning also attend the afternoon session in pre-school

provision currently at Enniskillen Integrated PS – dual places.

- Cognisance needs to be given to the challenging financial climate many schools find themselves in which adds to the difficulty/stress by trying to maintain staffing levels and provision in schools with potentially diminishing enrolments. Projections show a decline in pre-school/primary population in this area and especially so for the 2022/23 school year.
- Nothing demographically has changed since 2017 and 2018 when previous development proposals were declined. We are therefore now perplexed as to why a third development proposal has been submitted given this fact?
- How statistics are generated and presented need very close scrutiny.
- Parents should have the right to choose their child's primary one educational route regardless as to what pre-school setting they have attended.
- Does not see how new evidence merits a re-examination of the proposal, what has changed from the proposals not approved in 2017 and 2019.
- Afternoon pre-school sessions are not as popular as the morning sessions for practical reasons such as parents/guardians leaving older siblings to school or passing the pre-school location on their way to work.
- The proposal seems to define pre-school provision on a sectoral basis, the assumption was that pre-school settings were non-sectoral.
- The case for change makes reference to the smooth transition from nursery into year 1. Jones Memorial Primary School would argue that we operate excellent transition programmes which ensure all children experience a smooth transition from pre-school to primary school, regardless of the setting from which they are transferring or primary school within which they will be enrolled. Also, it should be noted that pupils that transition from our reception class to another setting are provided with a carefully constructed transition package.
- As a nursery school with no affiliation to any one primary school and the Board of Governors feel that if another nursery unit is given more places, this is discriminatory towards our school and the pupils enrolled in it. Often selection for enrolment into a primary school is that the child has attended a particular nursery unit, normally linked to that primary school. This would mean the children attending Enniskillen Nursery School would therefore not be eligible for that selection criteria as we are not directly linked to any one primary school and therefore we feel our pupils would be disadvantaged.
- It is not apparent from the case for change that additional or new information is presented in support of the latest proposal. The new evidence does not demonstrate any change in the current situation within Enniskillen/wider Fermanagh area.

Erne Integrated College – Supports the proposal

- Continued demand for integrated pre-school education.
- The next nearest integrated nursery unit is Omagh.

- Location on Enniskillen Integrated campus allowing a streamlined approach to integrated education.
- Use of existing buildings and staff - limited cost involved for DE.

Rt Hon Arlene Foster MLA and Controlled Schools' Support Council – Do not support the proposal

- The demographics have not changed from 2017 and 2018, when previous development proposals were declined. The birth rate in Fermanagh has in fact dipped and this will affect upon the 2022/23 intake.
- The reasons provided by the Department of Education to not approve the previous proposals, to similarly expand this nursery provision remain valid.
- Some children are attending a nursery in the morning with a PEG place and then attending the integrated nursery which is paid for by the Integrated Education Fund in the afternoon, thereby double counting the children.
- CSSC notes the Minister's statement to the Area Planning Steering Group (21 October 2020) which confirmed an extension of one further year to the current timescale for delivery of the Action Plan 2019-2021 to 31 August 2022. A number of conditions applied to the extension appear to CSSC to be relevant to this proposal, two of which were:
 - with so many workstreams not yet substantially advanced, no new proposals should be brought forward during the extension period unless they are demonstrably essential to respond to the needs of children and young people of compulsory school age;
 - where previously submitted proposals are brought forward again, the area planning teams will expect to see clear and compelling new evidence that supports their publication.

As the proposal is out with the Minister's stated priorities, does not respond to the needs of children and young people of compulsory school age and that, in the Council's view, no new and compelling evidence has been provided within the case for change, it is not clear how this proposal can be progressed, within the timescale of the current strategic area plan.

This development proposal was discussed by the Education Authority's Strategic Planning and Policy Committee at its meeting on 16 September 2021.

EDUCATION AUTHORITY COMMENTS

In the context of planning on an area basis - what is the EA's view of the proposal, taking into account any pre-publication consultation. Does the EA support the proposal?

Name:	Michele Corkey
Office Held:	Director of Education

In keeping with established procedure the Education Authority has requested Pre-school Education Group's (PEG) assessment of the proposal.

The proposal to expand pre-school provision at Enniskillen Integrated Primary School was discussed by PEG at its meeting on 1 April 2021, detailed in the Case for Change. PEG considered the proposal from Enniskillen Integrated Primary School for comment in line with guidance provided by DE regarding pre-school education and the statutory duty to encourage and facilitate Integrated and Irish medium education as follows:

Signed:	<i>Michelle Corkey</i>	
Date:	16 September 2021	
		<p><i>“It is important the Education Authority and the PEG support the Department in fulfilling its statutory duty by striving to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish medium pre-school education.</i></p> <p><i>In this context, PEG supports the Development Proposal on the basis of demonstrated parental demand as evidenced by:</i></p> <ul style="list-style-type: none"> <i>• the number of 1st preference applications (45 for 26 places); and</i> <i>• overall enrolment trends for the school and the Year 1 intake over a number of years, which would suggest that a 52 place nursery unit would be sustainable.</i> <p><i>However, PEG has concerns in regard to the potential impact of this additional provision, including:</i></p> <ul style="list-style-type: none"> <i>• Potential displacement of existing funded pre-school provision in the area. An existing privately funded playgroup is currently in operation at Enniskillen IPS.</i> <i>• Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds.</i> <i>• Impact on existing well established cross-community provision across the Fermanagh area in respect of the duty to promote, encourage and facilitate Shared Education policy.”</i> <p>The Education Authority is concerned that the implementation of this proposal will result in increased costs for the existing provision which is already in excess of demand. Any additional pre-school provision within the area will detrimentally impact on current non-denominational pre-school providers both statutory and non statutory. However, The Education Authority also recognises the parental demand as outlined in the case of change and acknowledges the PEG recommendation, the guidance provided by the Department of Education, and its duty to assist the Department of Education’s statutory requirement to encourage and facilitate integrated education.</p> <p>The Education Authority is proposing to publish Development Proposal 664 the week beginning 27 September 2021.</p>

EDUCATION AUTHORITY

PRE-SCHOOL EDUCATION PROGRAMME 2020-21

DEVELOPMENT PROPOSAL TO ESTABLISH AN AFTERNOON NURSERY SESSION AT ENNISKILLEN INTEGRATED NURSERY UNIT WITH EFFECT FROM 1st SEPTEMBER 2022 OR AS SOON AS POSSIBLE THEREAFTER

Date of PEG Meeting:- 1st April 2021

PEG Comments

School	Enniskillen Integrated Primary School & Nursery Unit
Address	12 Derrygore Road, Enniskillen, Co Fermanagh
PEG Comment – overview of rationale for comment.	<p>PEG considered the DP from Enniskillen IPS for comment in line with guidance provided by DE regarding pre-school education and the statutory duty to encourage and facilitate Integrated and Irish-Medium education as follows:</p> <p>“It is important the Education Authority and the PEG support the Department in fulfilling its statutory duty by striving to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish-medium pre-school education”</p> <p>In this context, PEG supports the DP on the basis of demonstrated parental demand as evidenced by:</p> <ul style="list-style-type: none"> the number of 1st preference applications (45 for 26 places). overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 52 place nursery unit would be sustainable. <p>However, PEG would have concerns in regard to the potential impact of this additional provision, including:-</p> <ul style="list-style-type: none"> Potential displacement of existing funded pre-school provision in the area. An existing privately funded playgroup is currently in operation at Enniskillen IPS. Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds. Impact on existing well established cross-community provision across the Fermanagh area in respect of the duty to promote, encourage and facilitate Shared Education policy.
What is the potential impact if the proposal is/ is not approved? (alternatives for meeting demand/ potential for over provision)	Enniskillen Integrated PS received 45 1st preference applications for 26 places in the 2021-22 academic year. Within a 2 mile radius 186 1st preference applications were received for 194 places and within 5 mile radius 202 1st preference applications were received for 217 places.
What is the PEG assessment of need for pre-school provision for the area? Is this need currently met?	The existing figures suggest sufficient provision exists to meet current demand within the area.
How many 1 st preference applications were received by the setting? (usually 2 years figures but this depends on the timing of the development proposal)	2021-22 45 1 st preference applications 2020-21 45 1 st preference applications
Are there current or anticipated pressures in placing pre-school children in the area?	No pressure within the area. 9 underage children admitted to Enniskillen Nursery School in the 2020-21 academic year.
Have children been unplaced at the end of the process in previous years?	BT74
Has demand been increasing over time but the number of places has not? Is the level of need or provision changing significantly? Eg new housing development, provider leaving PSEP	Projected live births for the Enniskillen town wards 2019-20 191 children 2020-21 147 children 2021-22 156 children 2022-23 169 children
Can existing non-statutory providers expand to help meet demand? Is there potential for new providers to come on to the programme?	There is no unmet need in the area. Spare capacity exists within non-statutory pre-school settings to address demand, if necessary.
What is the potential impact on existing good quality provision (displacement)?	Underage children have been admitted to Enniskillen Nursery School for the last 4 academic years. Potential for this to increase.
If there are other development proposals in the area, how might they impact? (eg if proposal A were to be approved, would B still be required?)	None that PEG is aware of.
Other comments	

1. Background

i. Description and location of school:

The bomb which exploded at the War Memorial in Enniskillen in November 1987 instantly killing eleven people, another was to die later, was the catalyst for the formation of Enniskillen Integrated Primary School.

After this event a group of likeminded people got together who believed that the introducing of Integrated Education was one of the ways to increase social solidarity and understanding in the Enniskillen area by bringing together parents and pupils from the two main religious groups, as well as those from other religions, and those who were atheist or agnostic.

A public meeting was held in November 1988 to gauge the degree of support for such a venture and following this well attended meeting a committee was formed, which with the help of the Northern Ireland Council for Integrated Education and many parents, succeeded, after a great deal of effort and hard work, in opening the school in September 1989.

In early 1997 at a meeting of WACTIE (Western Area Trust for Integrated Education) the directors discussed the idea of establishing an integrated nursery unit. This was spearheaded by the late Mr. Bill Barbour and all involved in WACTIE believed an integrated nursery unit was essential for the growth of integrated education in Fermanagh.

The Nursery Unit opened in temporary premises in 1997, moving to a permanent building on land acquired by WACTIE, in 1998. The nursery unit is in the unique position of being on the same campus as both the primary school and Erne Integrated College.

Enniskillen Integrated Nursery Unit was the first free nursery provision in Fermanagh.

This was all financially possible due to grants from The European Funds for Peace and Reconciliation, DHSS and The Integrated Education Fund. GMI Status was granted for Enniskillen Integrated Nursery Unit in 2000 – awarding the Nursery Unit 26 Part-time places. This was not comparable with the provision offered to other nursery providers in the town centre group of wards.

It is worth noting that this is the only statutory nursery in the ward that does not have either full-time places or double intake.

This current status with the mismatch of provision and the refusal of the recent proposals have implications under the development of integrated education as set out in Article 64 of The Education Reform (NI) Order 1989.

Provider	Number of Pre-School Places
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Enniskillen Integrated Nursery Unit	26 Part-Time
Enniskillen Nursery	78 26 Full-Time and 52 Part-Time
Holy Trinity Nursery Unit	52 Full-Time
Squirrels (Montessori)	Morning and Afternoon sessions Numbers determined by PEG

Within the 2016-2017 and the 2017-2018 submissions to the Permanent Secretary there are Maps of Alternative Nursery and Pre-School Provision. There are concerns about the inclusion of the Reception Class at Jones Memorial PS and Enniskillen IPS Board of Governors trust that this was not taken into consideration when making a decision regarding over-provision in the area. Reception provision is not seen as an appropriate provision. As the following quote from Learning to Learn (October 2013)¹ shows *“an aim of the Pre-School Education Expansion Programme was the replacement of existing reception provision with suitable alternative provision. Reception classes do not always provide an appropriate pre-school environment for children, and the Department has not approved new reception provision since 1998/99. Numbers in reception provision have fallen from 2,575 children in 1997 to 417 in 2012/13 (as at October 2012).”*

The current Nursery Unit was not funded by the Department and is a permanent, fit for purpose building which and has currently only 26 part-time morning places. Please refer to the Accommodation Schedule template.

Over the years the school has applied unsuccessfully for both temporary flexibility to nursery admissions and to DE in 2012 to change Part-time to Full-Time places, to allow for parity with the other schools in the local area.

September 2021 applications oversubscribed. The school applied for temporary flexibility for an additional four places to the nursery. This was approved on 9th March 2021 by DE.

The school is aware additional PEG places are awarded to a local Pre-School centre on the basis of need, places are published as ‘to be determined’ which seems less than transparent. It would seem appropriate that these places should be zero rated on Jones Memorial PS LMS Budget as this has been the policy for some time. If this is the case, then the Board of Governors are confused to see that the reception places in Jones Memorial have been included in the overall pre-school provision in the area. This seems to be an inconsistency approach to viewing pre-school provision when little attention is paid to the fact that Enniskillen IPS has been operating a non-funded playgroup for the past three years and these places are not included in the figures for overall pre-school provision in the area. The

¹<https://www.education-ni.gov.uk/sites/default/files/publications/de/a-framework-for-ey-education-and-learning-2013.pdf>

school believes that decisions have been taken in respect of the ward location and statistics within the location which do not take account of the fact that the catchment for Enniskillen IPS actually covers most of County Fermanagh as demonstrated on Maps 1 and 2 and therefore it is much broader than just the local wards. The school is not seeking full-time nursery places; but the ability to offer an afternoon session in the vacant nursery building which will match the Year 1 provision.

The Board of Governors and whole school community were delighted in 2014 when they received ministerial approval to increase the primary school enrolment. It is very unusual that the school has a double class intake in Year 1 and yet can only offer 26 Part-time places in the Nursery Unit. This anomaly is causing the school a conundrum – the school is in the process of expanding their permanent school building through Fresh Start money to facilitate the growth in the primary school, yet they cannot offer nursery unit places in the afternoons to match the double intake in the primary school. Therefore, the current 26 Part-time Nursery provision is not encouraging or facilitating the development of integrated education in County Fermanagh.

Since 2016 the school has provided an afternoon Playgroup session to meet parental demand for integrated pre-school provision which was funded by The Integrated Education Fund.

All children who attended either the Nursery Unit or Playgroup during 2019-2020 applied for a Year 1 place in September 2020 as it is a smooth transition for both the children and the families. Note: this smooth transition will be referred to again later in the proposal.

Table 1: Year 1 Admissions September 2020

	Number applying to Year 1 in Enniskillen Integrated Primary School
Nursery Unit: 26	26
Playgroup: 26	26
Total	52
Total applications to Year 1 September	75

Enniskillen Integrated Primary School and Nursery Unit is proud of its strong working relationships with other local primary schools. Enniskillen's strong ethos has allowed them to build the relationships and strengthen them even though the disclosures on the EA consultations on previous Development Proposals could have been potentially damaging to working relationships between the schools.

Enniskillen IPS is the Lead school in the (DE) Pilot Early Years Cluster. It is also the lead school in the annual joint staff CPD – reaching out to local schools to share good practice and has been a partner school in the Fermanagh Shared Education programme.

During the recent closure of schools due to Covid-19 the school has continued to reach out to other schools. The Principal established a group, which she is now leading, to support The Early Years in Fermanagh. This widely used group was there for advice, to reassure and signpost DE or EA directives. The Principal of Enniskillen IPS also continued to mentor a new Principal throughout this time and offered advice and support. The Principal remained a member of The Fermanagh Principals' Group where there was sharing of ideas and information throughout the Covid-19 school closures.

It is each school's own responsibility to provide their children with the best education they can, approval of this Development Proposal will improve the offering across all of the educational provision in the area.

Enniskillen Integrated Primary School and Nursery Unit had a Sustaining Inspection in June 2017 and again ETI have stated:

'Enniskillen Integrated Primary school continues to demonstrate a high level of capacity for sustained improvement in the interest of all the learners.'

During Covid-19 The School Principal contributed to ETi's survey on Pre-School provision during lockdown.

The Board of Governors and staff of the school worked tirelessly to provide this for all the children and learners. The growing school population is evidence of parental demand for integrated primary education in County Fermanagh and the Board of Governors are simply attempting to deliver the best they can to accommodate this need.

During 2016, a Steering Group of the Board of Governors, which includes parents, governors and staff, was established to take forward this nursery proposal within the school and the local community. This group was established in January 2016 after the Admissions Sub-Committee of the Board of Governors had again admitted 26 Part-Time places and refused again parents their First Preference – including 7 children who have brothers and/or sisters enrolled at Enniskillen Integrated Primary School.

The Board of Governors of Enniskillen Integrated Primary School believes that the existing provision at the school, in conjunction with the proposed future development highlighted in this development proposal will ensure compliance with The Department of Education's Sustainable Schools Policy.

The Board of Governors were extremely disappointed in DE's decision to reject the Development Proposal in May 2017. The reason given was over provision and the potential impact on other settings. At a meeting of 22nd May 2017, the Board of Governors unanimously agreed to submit another Development Proposal to DE during 2017-2018. This was on advice from The Steering Committee which had been established during 2016-2017.

The Board of Governors read at length the opposition to the Development Proposal as obtained through FOI.

NICIE submitted a paper to DE in July 2017 regarding the refusal of several nursery proposals and the *'Department wrote to the statutory planning authorities on 31 October 2017 reminding them of the need to support DE in the fulfilment of the statutory duty to encourage and facilitate the development of Integrated and Irish-medium education, highlighting the role that the Pre-school Education Group (PEG) should play in striving to meet demonstrated parental demand in an area for pre-school education located at Integrated primary schools'*²

The Board of Governors submitted another proposal in 2017 which was not published until May 2018 and refused in April 2019. This time the grounds for refusal were budget overspend within The Department of Education.

Subsequent to this, NICIE submitted a paper in August 2019 to the Permanent Secretary, in December 2019 to the Secretary of State for Northern Ireland and in February 2020 to the Minister of Education. NICIE raised the issue of 2-year olds in the system and how the failure to implement the recommendations outlined in Learning to Learn – A Framework for Early Years Education (October 2013)³ had been very costly to the education budget. NICIE believes that if the issue of two year olds been dealt with, then there may well have been enough funding to allow for growth in the proposed settings and thereby discharge the DE Article 64 duty from the 1989 Education Reform Order (NI), to encourage and facilitate the growth of integrated education.

The level of two-year olds in the system are an indication of spare places in settings which are not over-subscribed with the appropriate aged children. Yet the existing integrated settings are over-subscribed or where a new setting is proposed, they have demonstrated parental demand for integrated provision.

The School Principal and Chair of the Board of Governors met with The Permanent Secretary on 25th September 2019 to discuss his decision not to approve DP 543, even though it had been recommended to him for approval.

The Permanent Secretary assured them his decision had been made purely on finance. He agreed DE has a statutory duty to integrated education and it was discussed at length if

² <https://www.education-ni.gov.uk/sites/default/files/publications/education/DP%20543%20%20Enniskillen%20IPS%20-%20Official%20s%20Submission.pdf>

³ <https://www.education-ni.gov.uk/sites/default/files/publications/de/a-framework-for-ey-education-and-learning-2013.pdf>

finance should be influencing the Department's statutory duty, particularly as this Development Proposal does not require capital investment.

The Permanent Secretary also agreed with the point raised from the school that an approval decision would also align and support the decision taken by The Department of Education in respect of an earlier Development Proposal for the school which established double entry and the financial investment in the school as it progresses as a Fresh Start build. The increase in Nursery Unit provision strengthens the applications to the school.

The Permanent Secretary agreed the school could re-submit their Development Proposal, particularly as there is no right of appeal to The Board of Governors when a Development Proposal is refused, especially when this one had gone for approval.

It is important to note that the non-approval by DE of the Development Proposals has increased the workload of the Principal. This contravenes TNC 2011/8 Workload Agreement. In 2017-18 the Board of Governors provided 16 places at a playgroup session to meet parental demand for integrated pre-school provision. In 2019-20, this was extended to 26 places to meet demand. These sessions were made possible by funding provided The Integrated Education Fund.

Due to DE non-approval of Part-time afternoon nursery provision in Enniskillen Integrated Nursery the Playgroup Session is now being registered with Social Services. This registration is causing unnecessary burden to the school:

- Separate policies for the morning and afternoon session
- Separate financial arrangements
- Separate Management Committee
- Two different inspection processes, ETI for the Nursery Unit, Social Services for The Playgroup
- Interview process for The School Principal, Playgroup Leader and assistant by Social Services
- Additional paperwork as required by Social Services
- Additional training for the nursery assistant to satisfy Social Services standards

*The teacher in the morning Nursery Unit is the leader in The Playgroup afternoon session, therefore there is no displacement of staff.

Supporting Statistics

The nursery unit is sited beside the new South West Acute Hospital and has applications during the year that they are unable to accommodate from newly appointed doctors to the hospital, relocated from outside of N Ireland.

Fermanagh has a higher % of their population born outside of N Ireland than the N Ireland %.

Table 2

Country of Birth for Fermanagh

	N Ireland	Rest of UK	Republic of Ireland	Europe	Outside Europe
Fermanagh	84%	5.47%	6.66%	2.71%	1.13%
N Ireland	88.84%	4.47%	2.09%	2.6%	1.84%

Source: Census 2011

Enrolments

As can be seen from Table 3 and 4 the school has grown steadily and in 2014 a Development Proposal was approved to grow to an admissions number of 56 with an enrolment P1-P7 of 326.

The school has exceeded this P1-P7 enrolment since 2017/18. Table 5 shows the applications and admissions to the Nursery Unit. It shows that the Nursery Unit has been significantly over-subscribed and could easily support a double unit. This is evidence of demonstrated parental demand as required by the DE letter of 31 October 2017.

Table 3 Enniskillen IPS Enrolment Growth since 2009

Academic Year	Enrolments inc Nursery Pupils
2009/10	244
2010/11	244
2011/12	246
2012/13	259
2013/14	272
2014/15	299
2015/16	317
2016/17	337
2017/18	358
2018/19	393
2019/20	397
2020/2021	418

Notes for Table 3:

Source NICIE and DE Includes 26 nursery places

Current approved enrolment 326 and admission number of 56 plus 26 place nursery unit

Two form entry approved 2014

Table 4 Applications and Admissions to Primary 1 Source (EA)

Year	Total Applications	Total Admissions
2017/18	56	56
2018/19	62	62
2019/20	52	52

2020/21	75	63
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Table 5 Applications to Enniskillen Integrated Nursery Unit 2012-2019 Source (School/EA)

Academic Year	1 st Preference	Total Applications Including 2 nd /3 rd /4 th /5 th preference and LATE applications	EA 1 st Preference Recorded Data	Total Admitted
September 2021	51	Unknown yet	45	30
September 2020	45	47	47	26
September 2019	65	77	59	26
September 2018	47	48	43	26
September 2017	44	60	43	26
September 2016	46	58	51	26
September 2015	32	54	34	26
September 2014	32	53	33	26
September 2013	37	59	39	26

Table 6 – Children with siblings at the school refused a place at the Nursery Unit

Year	No of siblings refused a place
September 2021	6
September 2020	2
September 2019	4
September 2018	3
September 2017	2
September 2016	7

Taking the information from Table 5 and Table 6 together indicates that the level of oversubscription is such that it would easily support a second unit and would help to alleviate the situation that is demonstrated in Table 6.

Expression of Interest

Due to Covid-19 the school was only able to send Expression of Interest Forms to their own school community March – June 2020.

However, the school still received 115 returns. These Expression of Interest Forms do not include families in County Fermanagh who have no contact with the school community and will not have been contacted due to COVID-19.

The returns are broken down as follows:

Table 7 – Expressions of Interest for Enniskillen IPS Nursery Unit

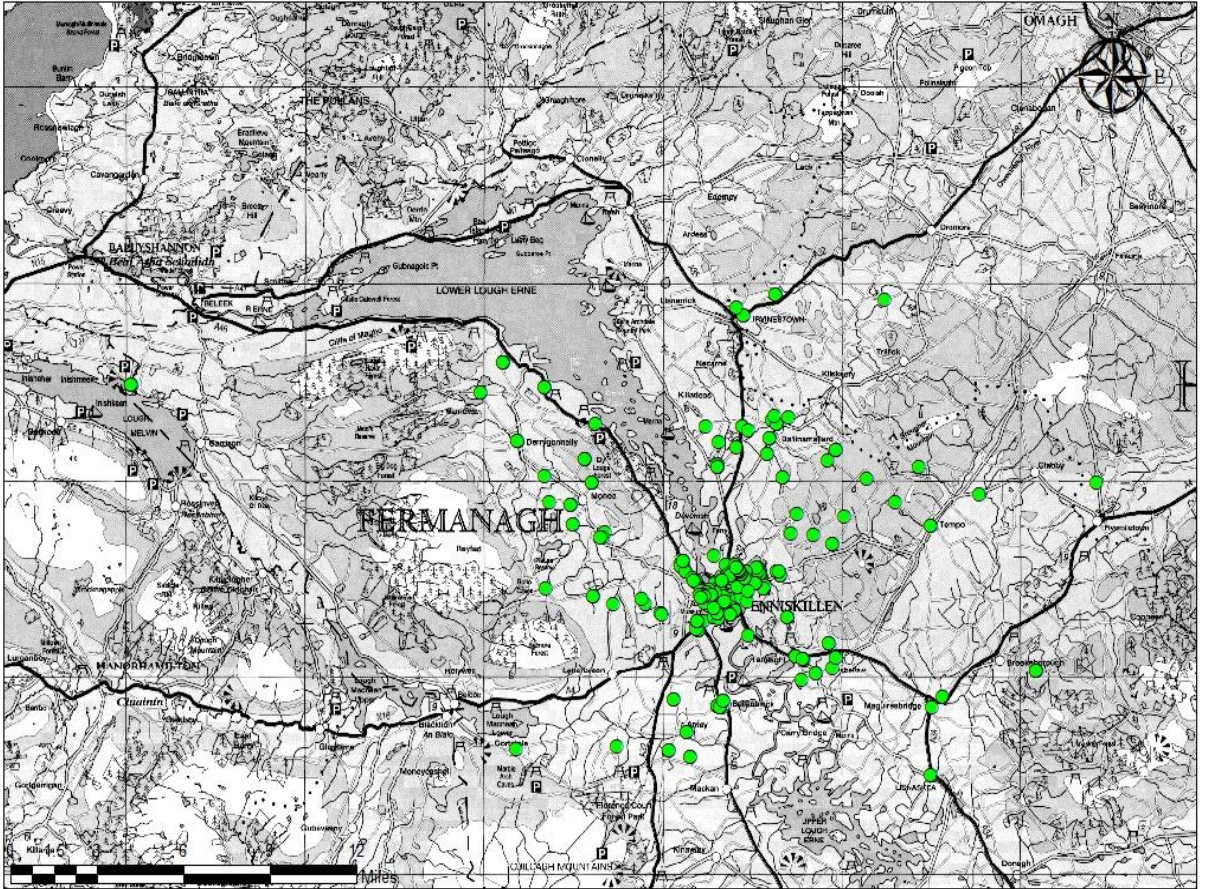
Expressions of Interest by Year	Number received
September 2021	38

September 2022	42
September 2023	35

Catchment Area

Map 1

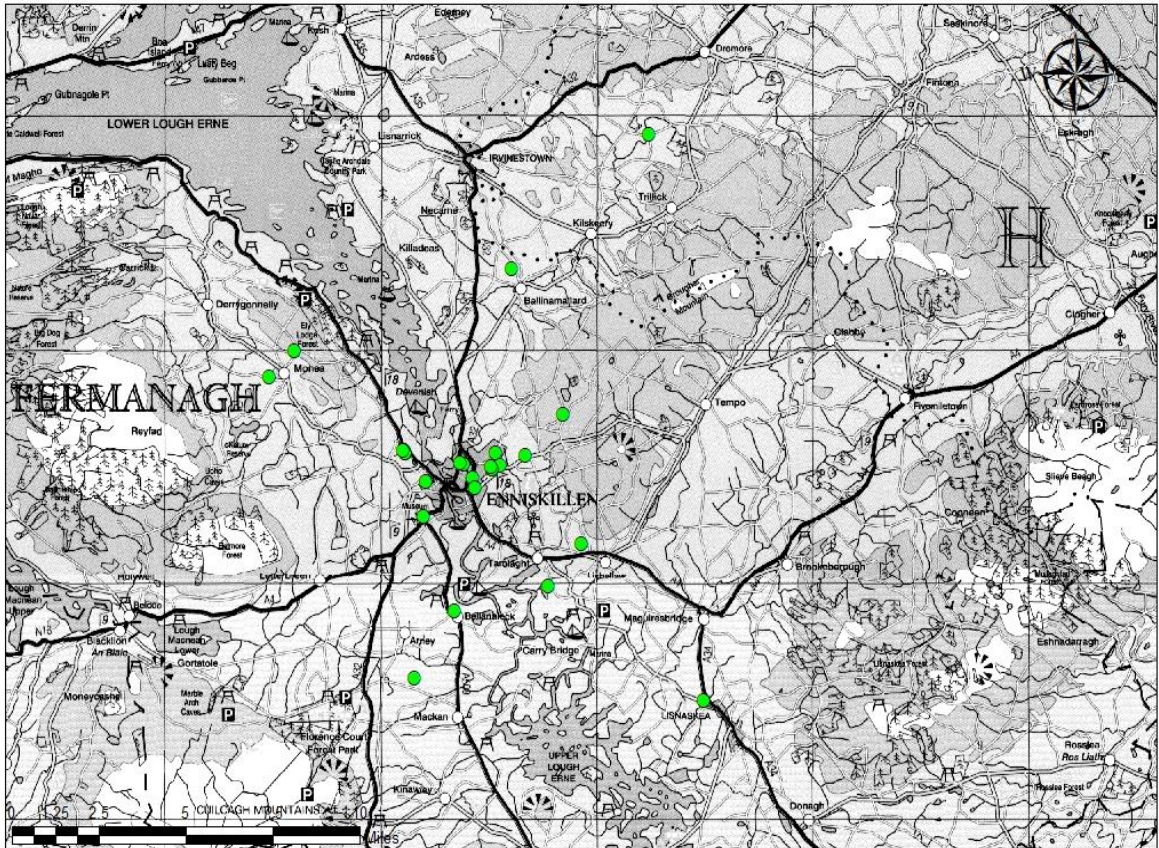
Enniskillen Year 1-7 Postcodes 19/20



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Map 2

Enniskillen Nursery Postcodes 19/20



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Examination of Maps 1 and 2 demonstrate that Enniskillen Integrated PS draws not just from the Enniskillen area but from the broader County Fermanagh and it serves the rural hinterland of this area. This applies not just to the P1 to P7 cohort but also to the nursery children. As the only Grant Maintained Integrated provider in County Fermanagh their applications come from across County Fermanagh.

This is further demonstrated by examination of the postcode information for the pupil intake at Enniskillen IPS which Tables 5 and 6 show that children are coming from 18 wards in the case of the Primary School and 14 wards in the case of the Nursery Unit. The wards are very different in nature with some being predominately Catholic and some predominately Protestant in makeup. The overall level of deprivation using the NIMDM of 2010 also varies across the wards. In the 2010 NIMDM, there are 890 Super Output Areas (SOAs) where 1 is the most deprived SOA and 890 is the least deprived. However, most of the wards where the children attending Enniskillen IPS reside, fall into the more deprived half of the Super Output Areas. In fact, over 41% of the children attending the school reside in the top 200 SOAs for deprivation. Taking the Rural Needs Act into account, it is important to note that 35.6% of the children in P1-P7 come from SOAs which are in the top 200 SOAs for deprivation with regards to proximity to services. In fact, 95 children (26%) of the pupils come from the top 100 SOAs for deprivation regarding proximity to services.

Looking at Education, Skills and Training deprivation, it is notable that 18 children come from Devenish ward which is ranked at 53 for education and skills deprivation. This proposal would be supportive of

the aims of Outcome 12 in the Programme for Government particularly since educational attainment is low in this District Electoral Area (DEA) with 40.77% had low or no (Level 1*) qualifications.

During 2017-2018 the school qualified for DE Extended Schools support for the first time under the postcode criterion - % of children living in deprived wards.

The school continued to receive Extended Schools under this criterion 2019-2020 and has been informed by DE this will continue 2020-2021. 2020-2021 Extended Schools did continue.

Table 8 and Table 9 together demonstrate that the school is serving a very wide catchment area with a rural population. Table 10 and Table 11 look at the distance travelled to school by P1- P7 pupils and nursery children respectively. Table 8 shows that 85.16% of the pupils travel more than 2 miles and 22.47% travel more than 5 miles. In the case of the nursery unit 74.4% of the children travel more than 2 miles and nearly 26% of them travel between 5 and 10 miles. Comparing the Enniskillen IPS Postcode Distribution Map 1 for P1-P7 children with the Rural Needs Act (2016) map (see Appendix 1), some of the children are coming from between 20-30 minutes' drive time and some are even travelling more than 30 minutes' drive time from Enniskillen which would place them in the rural area definition. Thus, Enniskillen IPS is providing a very valuable service to this area which can only be enhanced by the provision of the second nursery unit. This on its own also demonstrates the strong desire for integrated education in the area.

Table 8: Postcode information for P1 to P7 at Enniskillen IPS 2019-20

Total number of pupils 365

Ward	Total resident in Ward	Level of Deprivation (2010)	Proximity to Services	Education Skills and Training	% Catholic	% Protestant
Ballinamallard	16	464	145	665	21.69	75.17
Belcoo & Garrison	3	303	3	498	85.05	12.4
Boho	27	440	78	589	55.23	41.22
Brookeborough	3	332	54	419	42.5	55.3
Castlecoole	43	410	491	350	52.09	42.75
Derrygonnelly	28	375	36	528	61.27	34.42
Devenish	18	29	820	53	80.61	16.52
Erne	60	193	753	299	71.87	24.55
Fivemiletown	1	312	82	326	23.56	72.8
Florence Court/Kinawley	8	373	29	591	67.79	30.8
Irvinestown	6	123	227	267	74.46	23.03
Lisbellaw	16	494	194	550	31.47	64.92
Lisnarrick	13	465	88	581	31.66	64.88
Maguiresbridge	3	448	177	514	42.29	54.84
Not recognised	11					
Portora	66	197	709	431	57.62	36.54
Rossorry	31	393	527	415	56.26	38.05
Tempo	11	335	93	408	49.42	48.61
Trillick	1	376	45	561	67.34	31.23

Table 9: Postcode information for Nursery Intake at Enniskillen IPS 2019-20

Ward	TOTAL RESIDENT IN WARD	LEVEL OF DEPRIVATION (2010)	% Catholic	% Protestant
Ballinamallard	1	464	21.69	75.17
Boho	1	440	55.23	41.22
Castlecoole	5	410	52.09	42.75
Derrygonnelly	2	375	61.27	34.42
Erne	4	193	71.87	24.55
Florence Court & Kinawley	1	373	67.79	30.8
Lisbellaw	3	494	31.47	64.92
Maguiresbridge	1	448	42.29	54.84
Portora	6	197	57.62	36.54
Rossorry	1	393	56.26	38.05
Tempo	1	335	49.42	48.61
Trillick	1	376	67.34	31.23

Table 10: P1-P7 pupils - Distance from home to Enniskillen Integrated Primary School 2019/20

Distance	%	No. of Pupils
0 - 1 miles	0.55%	2
1 - 2 miles	12.33%	45
2 - 5 miles	63.29%	231
5 - 10 miles	19.73%	72
>10 miles	2.74%	10
Postcode not recognised	1.37%	5

Total number of pupils: 365

Table 11 Nursery unit pupils- Distance from home to Enniskillen Nursery Unit 2019/20

Distance	%	No. of Pupils
0 - 1 miles	3.70%	1
1 - 2 miles	22.20%	6
2 - 5 miles	48.50%	13
5 - 10 miles	25.90%	7
>10 miles	0	0

Total number of pupils: 27

Sustainability Assessment

i. Quality Educational Experience:

Enniskillen Integrated Primary School and Nursery Unit was inspected by The Education and Training Inspectorate (ETi) in March 2011.

“the quality of education provided by this nursery is outstanding”

and

“the quality of education provided by this school is outstanding”

ETi carried out a Sustaining Improvement Inspection in June 2014 and both the Nursery Unit and school remain “Outstanding.” June 2017 Sustaining Improvement Inspection.

ii. Stable Enrolment Trends

These are illustrated by Tables 3, 4 and 5 above.

The Primary School had an approved Development Proposal to increase intake and capacity in February 2014 due to a pattern of heavy oversubscription for places.

Oversubscription in Nursery Unit applications for the 26 Part-time places is similar.

As the school now have dual intake into Year 1, they believe they would be offering the children the best possible start by having a dual nursery unit session to provide that seamless transition into Year 1.

The Board of Governors believe Ministerial approval for an additional afternoon nursery session to be established in the existing unit at Enniskillen Integrated Primary School, would be a welcome addition to the provision of integrated education in County Fermanagh as they are the only Grant-Maintained provider in the whole of County Fermanagh. The Board of Governors is not currently meeting parental demand for places in the integrated nursery setting.

iii Sound Financial Position

The schools have a proven sound financial track record, but this is difficult to currently illustrate as they are a growing school – the school currently has double classes up to and including Year 5, by September 2018 they will have double intake Years 1 – 7. The school is therefore operating in a deficit as they are employing a teacher before they receive a budget allocation for them – this pupil growth allocation is based on October Census figures and is then allocated by DE for the next Financial Year. The school is also disadvantaged in receiving additional pupil growth money during the year due to current DE policy; in that there is no allocation for all additional pupils.

The Board of Governors takes their financial responsibilities seriously as demonstrated by their regular meetings, excellent internal Audit Reports, employment of a Part-time bursar to manage the budget on a daily basis and before school growth, operating in a surplus.

As a grant-maintained integrated school the school has never had the luxury of ‘carrying’ a deficit or ‘been allowed to run into deficit.’ Even in these difficult financial times the school had a good financial performance during 2016-2017 in that they had a marginal surplus.

iv Strong Leadership and Management:

Enniskillen Integrated Primary School has a strong leadership team:

“The quality of leadership and management is outstanding” ETi 2011

The school vision for all staff is:

“Building Capacity to Raise Attainment”

The school willingly shares their leadership and management with local providers.

v: Easy Access:

Enniskillen Integrated Nursery Unit operates in its own permanent building with the campus of Enniskillen Integrated Primary School and Erne Integrated College. It is accessible to all future pupils travelling from areas outside the immediate catchment area.

vi: Community Links

Enniskillen Integrated Primary School and Nursery Unit has strong links with the local and wider community.

- The school is a learning hub for Stranmillis University College – June 2016 they hosted a two-day course for all schools in Fermanagh – Supporting Purposeful Play
- The School Principal is the Lead for DE’s initiative Learning to Learn Framework for Early Years, in County Fermanagh
- The Nursery Unit and Playgroup Nursery Unit participates in The Shared Education Programme
- The School Principal has initiated and is organising joint Continued Professional Development for all staff with the other local providers in Enniskillen in January 2017
- The school hosts information evenings for local and regional providers e.g. NSPCC, E-Safety, Parent Advice Centre
- The school offers all sport to the children from the ‘perceived’ sport within communities in N Ireland
- Cross-Border initiatives
- December 2015 the school invited the whole Enniskillen community to their Carol Service held in both The Roman Catholic and Church of Ireland churches
- The school hosts both teachers and students from other countries

- The school supports both local and global charities
- The school offers their school for community use: Disability NI, EA(Western), Enniskillen Royal Boat Club
- The school's Parent Council funded an evening for parents in March 2020 with a focus on anxiety in children and teenagers – opened to wider community free of charge
- Both the Nursery Teacher and the school SENCO have benefited from projects funded by The British Council – The Nursery Teacher visiting Italy 2018-2019 and The SENCO visiting Canada 2019-2020
- The School Principal is a mentor for new Principals at the invitation from EA

Area Planning Impact

'Compelling New Evidence'

In restarting the Area Planning process on 21 October 2020. The Education Minister gave a number of messages about the projects that will be brought forward until the end of the extended Action Plan which will now run until August 2022.

NICIE asked for clarification about some of the points raised at this meeting Here are a few extracts from DE's reply (attached) to NICIE's letter:

'...the Minister did not fully rule out the bringing forward of new proposals. He was, however, very clear that where this is the case, they must demonstrably show how they are essential to responding to the needs of children and young people and should be supported by clear and compelling new evidence.'

...'While the Permanent Secretary correctly referenced his wider Accounting Officer responsibilities in setting out his decision on each of these proposals, he also referenced, variously, other factors and impacts specific to the individual settings which he had taken into consideration in reaching his determination. These included existing levels of provision, potential for over-provision, potential increase in the number of under-age children accessing statutory places, projected future decline in the relevant age cohort and risk of displacement of good quality, existing provision.'

'...It is in this context that I also wish to expand on the query you raise regarding who will determine what constitutes "clear and compelling evidence". It is a matter for the proposer of any DP to ensure that all relevant evidence is sourced and set out in the Case for Change. That evidence will be tested by the Department with input across Directorates and presented to the Minister for decision.'

'...I would encourage any school that is considering bringing forward a proposal to establish nursery provision to look at the submissions (published on the Department's website) and the Permanent Secretary's comments and decisions as they will be helpful in determining how to frame any proposal and address the point about new/updated evidence'

Population growth in the area

Table 12 below shows that there has been a growth in the 0-15 population in the Fermanagh and Omagh Council District. This is noteworthy, as several of the eleven District Council Areas have had decreases in the 0-15 population.

Table 12: Population Estimates 2019 ⁴ by Council area – Fermanagh and Omagh

Population by age

Age	2008	Mid-Year 2017	2018	Population change			
				Year ending mid-2018		Decade ending mid-2018	
				Number	%	Number	%
0-15	24,800	25,400	25,400	100	0.3%	600	2.4%
16-64	71,900	71,900	71,900	<100	0.0%	100	0.1%
65 and over	15,300	19,600	20,100	500	2.4%	4,800	31.0%
65-84	13,400	17,200	17,600	400	2.4%	4,200	31.3%
85 and over	1,900	2,400	2,400	100	2.8%	500	28.9%
All Ages	112,000	116,800	117,400	600	0.5%	5,400	4.8%

Source: NISRA

Table 13 below shows that the population growth in the assembly area Fermanagh and South Tyrone over the last decade 2009-2019 has been 8.1% which is above the NI figure of 5.6%.

Table 13

Table 1: Population Estimates by broad age bands, 2019

	Fermanagh And South Tyrone AA	Northern Ireland
Total Population (2019)	109,281	1,893,667
Children (0-15 years)	24,375	395,925
Young Working Age (16-39 years)	32,381	578,542
Older Working Age (40-64 years)	34,622	604,476
Older (65+ years)	17,903	314,724
Population Change % (2009-2019)	8.1%	5.6%

Source NISRA

⁴ <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE19-Factsheets.pdf>

Table 14**Resident Live Births in Local District Councils 2015-2018**

Area	2015	2016	2017	2018
	Antrim & Newtownabbey	1,796	1,759	1,665
Armagh City, Banbridge & Craigavon	2,977	2,943	2,869	2,840
Belfast	4,584	4,593	4,188	4,270
Causeway Coast & Glens	1,722	1,655	1,622	1,515
Derry City & Strabane	2,061	2,001	1,902	1,896
Fermanagh & Omagh	1,413	1,513	1,500	1,494
Lisburn & Castlereagh	1,716	1,745	1,723	1,791
Mid & East Antrim	1,509	1,571	1,515	1,449
Mid Ulster	2,174	2,147	2,126	2,052
Newry, Mourne & Down	2,509	2,499	2,408	2,360
Ards & North Down	1,754	1,650	1,557	1,532
Northern Ireland	24,215	24,076	23,075	22,829

Source NISRA

Table 14 shows that the births in Fermanagh and Omagh have remained steady at roughly 1500 for the last four years, whilst births in several of the Local District Councils in Northern Ireland and Northern Ireland as a whole declined. Thus there is no decline in the cohort in this LGD. (See extract of letter from DE)

Table 15 Birth rates in the feeder wards for Enniskillen IPS

Ward	2014 All births	2015 All Births	2016 All Births	2017 All Births	2018 All Births
Ballinamallard	30	25	28	24	26
Belcoo & Garrison	32	28	27	34	34
Boho	44	52	44	35	46
Brookeborough	25	34	44	36	35
Castlecoole	55	42	46	51	44
Derrygonnelly	28	33	36	38	40
Devenish	20	19	23	21	20
Erne	36	29	27	21	20
Fivemiletown	32	26	28	23	27

Florence Court/Kinawley	41	37	48	37	42
Irvinestown	30	31	34	39	40
Lisbellaw	34	35	32	33	37
Lisnarrick	17	10	21	15	22
Maguiresbridge	32	61	42	38	52
Portora	37	44	48	43	39
Rossorry	25	24	19	32	22
Tempo	37	32	41	42	39
Trillick	39	31	40	27	35
Total	594	593	628	589	620

Source NINIS

Average number of births across all the feeder wards in the five years is 605

Table 15 shows that the birth rate in the wards that act as feeders to Enniskillen IPS has not declined since 2014 and has remained steady at around 605 per year. Thus there is no decline in the relevant age cohort size in the area surrounding Enniskillen IPS.

Local Schools

The following table shows the list of providers in a five-mile radius of Enniskillen town as shown on the EA website.

Table 16: Pre-school Provision in a Five Mile Radius of Enniskillen as from EA website with Admissions Figures from EA for 2018/19-2020/21

School Name	School Mgt type	2018/19		2019/20		2020/21	
		1 st prefs	Total Adm	1st Prefs	Total Adm	1 st prefs	Total Adm
Bo Peeps Playgroup	Voluntary	15	15 (15)	8	11 (14)	7	7 (11)
Enniskillen IPS NU	GMI	47	26 (26)	65	26 (26)	49	26 (26)
Enniskillen NS FT	Controlled	42	26 (26)	78	26 (26)	79	26 (26)
Enniskillen NS PT	Controlled	41	52 (52)	24	51 (52)	13	52 (52)
Holy Trinity Pre School	Voluntary	9	15 (16)	16	16 (16)	No data	
Holy Trinity PS NU	Maintained	52	52 (52)	46	51 (52)	60	52 (52)
Mullanaska Preschool	Voluntary	24	25 (25)	36	26 (26)	21	23 (26)

Squirrels Montessori Nursery	Private	34	31 (31)	26	29 (31)	27	29 (30)
Tiny Tots Cross Community Playgroup,	Voluntary	22	24 (24)	28	26 (26)	17	19 (19)
	TOTAL	286	266 (267)	327	262 (269)	273	234 (242)

Source: EA

Table 16 shows that much of the statutory provision is over-subscribed and there appears to be a shortfall of provision, against first preferences, of approximately 21 places for 2018/19; 58 for 2019/20 and 31 for 2020/21 and given that Enniskillen IPS is supplying 16 playgroup places then the shortfall in the 5 miles' radius is significant. Using the EA website, examination of the Primary 1 places within a five miles' radius of the more centrally located Enniskillen Model Primary School, shows that there are seven other schools in this area.

Whilst this area would include two more pre-school providers, this would indicate that there is some shortfall in provision. It likely too that the opening of the Enniskillen IPS afternoon playgroup has obscured the extent of the shortfall.

In addition, as the application is for an afternoon session and there are 7 other settings (8 if Jones Memorial is included) in a 5-mile radius of the school, any impact will be lessened as it will be spread across all these other providers.

There is parental demand for a GMI pre-school experience which aids smooth transition into Foundation Stage and parents are willing to travel to the Nursery Unit from across County Fermanagh.

It is true there are arrangements in place for smooth transition between pre-school providers and Year 1 but this cannot be compared to the transition arrangements the school has in place. The school and Nursery Unit are situated on the one campus, have the same Board of Governors, Parents' Council and therefore the nursery parents and children are part of the school community before they even attend Year 1. The nursery children use the school facilities, have their lunch in the school, attend special events, therefore the transition to primary school is seamless.

The Integrated Education Fund responded to the school's financial request for 2016 and 2017 to allow them to operate an afternoon playgroup session to meet the parental demand from those who already had children in the school. The school opted for Playgroup provision to allow them to become registered with WHSCT for the afternoon provision. This decision was taken by The Board of Governors to respond to parental demand, particularly those 7 children, in 2016, whose siblings are already enrolled in the integrated primary school and they did not receive a place in the nursery unit. The Integrated Education Fund provided the school with the additional staff costs for one year in response to their evidence of turning children away and their inability to secure temporary variation in their numbers.

Due to the continued oversubscription of first preference applications to Enniskillen IPS's Nursery Unit, the Integrated Education Fund has continued to financially support the school again in 2018, 2019 and now for 2020. This has been an unwavering support from The Integrated Education Fund

but such is their belief in supporting the school to provide integrated pre-school provision to those who chose it in County Fermanagh and secondly their recognition that these pre-school places sustain the school Year 1 enrolment – this too is a commitment to the financial investment The Department of Education has made in providing the school with a new extension under The Fresh Start Programme.

Therefore, the school operated an afternoon Playgroup session during 2019-2020 and during 2020-2021 and have not affected their local providers. Thus any displacement that may have occurred has already happened as the playgroup is in its fifth year of operation. (See extract of DE’S letter). DE accepted that this was likely to be the case when giving approval to the Millstrand IPS application for a second nursery session in May 2019 where the playgroup had also been operating for several years (page 51 of submission to the Permanent Secretary.)

‘Many young children already travel some distance to the school from outside Portrush and it could be argued that displacement has already occurred. There is no alternative integrated pre-school provision for around 19 miles.’

The prospect of this Development Proposal impacting negatively upon other local providers is also mitigated somewhat by the fact that pupils come from a wide catchment, as is illustrated by Maps 1 and 2.

In further addressing the issue of ‘Compelling New Evidence’ this proposal will refer to current DE Policy and the reliability of the criteria used for assessing proposals

Table 17 Underage Applications and Admissions to Statutory Providers in a five-mile radius from Enniskillen IPS 2018/19 – 2020/21

Statutory Provider	Enrolment Number	Total Underage Applications (1 st Preferences)			Total Underage Admissions		
		18/19	19/20	20/21	18/19	19/20	20/21
Enniskillen IPS NU PT	26	4	5	4	0	0	0
Enniskillen NS FT	26	1	19	12	0	0	0
Enniskillen NS PT	52	34	15	7	25	3	6
Holy Trinity PS NU FT	52	1	5	13	0	7	0
Total		40	44	36	25	10	6

Source: EA

Underage issue

Table 17 shows the level of underage children admitted to statutory provision, nursery schools and units in the catchment area. The issue of underage children has been of great concern to the Department in preparing the submission for decision making on the previous proposal and the other integrated proposals. In fact, it has been used as a criterion for making a decision about the long-term future of the school and its sustainability when it would appear that these figures of underage children in settings are not a trend but vary year to year. They do not appear to be linked to application numbers. The Board of Governors and NCIE would contend the issue of underage children is as a result of the failure by DE to implement fully the recommendations outlined in Learning to Learn- A Framework for Early Years Education and Learning October 2013. The cost of two-year olds in the statutory system has been cited as a reason for refusal to enable integrated schools to grow. The Governors and NICIE would contend this school should not be prevented from growing in response to demonstrated parental demand when the premise of underage is not a reliable criterion and the problem being addressed is not of the integrated schools making but rather the failure of DE to implement its own recommendations.

P1 proxy issue

Examination of the level of provision within the 2-mile radius of Enniskillen IPS (Table 18) indicates a significant disparity between the P1 proxy figures, the 1st preference and the total pre-school provision. It would indicate that Enniskillen town is serving as a hub area for pre-school provision. In relation to Enniskillen IPS, as indicated on the maps is serving a very large area of rural County Fermanagh. As NICIE has pointed out before, EA PEG is using birth rate statistics and 1st preferences to plan for total pre-school provision, whereas DE are using P1 proxy figures to decide on development proposals. This leads to a situation where DE is using figures which are looking back at the P1 population to predict future need. In this area, the disparity between the three sets of figures (P1, 1st Preference and Pre-School provision) shows that the use of P1 figures, given the hub nature of Enniskillen is creating a barrier to the further growth of Enniskillen IPS. Using the P1 proxy figures, it appears that there is over-provision when in fact there is a closer match between 1st preferences and total pre-school figures than there is between P1 provision figures and total pre-school provision or 1st preferences.

Examination of the level of provision within the 5-mile radius (Table 19) shows that the P1 places increase by 130 to 160 above the provision within 2 miles, i.e., they are more than doubling, however the total pre-school provision only increases by 70-80 places and the 1st preferences increase by roughly 50-90 places. The submission on Enniskillen IPS DP No 543 that was given to the Permanent Secretary covers this issue at Tables 9 and 10. The Board of Governors would argue that the use of the P1 places as a proxy for approving pre-school provision has been shown, particularly in this case, as an unreliable measure. This is because Enniskillen town acts as a hub for pre-school and children appear to be returning to their rural villages for primary education.

Given that it has been show on Maps 1 and 2 that Enniskillen IPS serves a large proportion of Fermanagh, application of P1 proxy particularly at the 2-mile radius is irrelevant and is acting as a barrier to the sustainable growth of Enniskillen Integrated PS. It would also appear that perhaps the use of P1 figures as a proxy for incoming pre-school children may be demonstrating an “inflexibility”

as a projection measure. Justice Treacy warned against this in his judgement of 2014 on the Drumragh Integrated College case as having “the effect of making it difficult to accommodate the Article 64 duty in future day to day decisions. The Department needs to be alive to the Article 64 duty at all levels, including the strategic level.”

The 2 mile and 5 mile radius tables both show that the underage children admitted fluctuates year to year and as previously noted, are again an unreliable and ‘inflexible’ projection measure to make decisions on future pre-school provision which the governors feel may impact on the long-term sustainability of the only integrated primary school in the whole of County Fermanagh.

Summary of the analysis of the new evidence

- There is no current decline in the cohort population in the area surrounding Enniskillen IPS
- The use of underage children as a criterion is unreliable as it fluctuates year to year and does not therefore constitute a trend
- The use of P1 as a proxy leads to inflexibility as a projection measure and is inconsistent with the measures used by the Education Authority (first preferences and pre-school provision).
- Since the use of the underage children and the P1 proxy measures could be viewed as unreliable and inflexible, then the inference of displacement arising from the assessment of over provision, using these measures, is flawed.

Table 18 Level of Provision – 2 mile radius of Enniskillen IPS (Holy Trinity PG is not operating 2020/21)

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision	P1 places (EA stats)	Level of pre-school provision (% of P1 places)	1 st Prefs (incl u/a)	Level based on 1st prefs (%)		Underage admitted
								incl u/a	excl u/a	
2016/17	156	42	0	198	142	139.4	No stats			5
2017/18	156	44	0	200	137	146.0	225	88.8	No stats	7
2018/19	156	47	0	203	137	148.1	225 (40)	90.2	109.7	25
2019/20	156	47	0	203	126	161.1	255 (44)	79.6	96.2	10
2020/21	156	30	0	186	134	138.8	228 (36)	81.6	96.9	6

Table 19 Level of Provision – 5 mile radius of Enniskillen IPS

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision	P1 places (EA stats)	Level of pre-school provision (% of P1 places)	1 st prefs (incl u/a)	Level based on 1st prefs %		Underage admitted
								incl u/a	excl u/a	
2016/17	182	90	9	272	277	98.2	No stats			9
2017/18	182	96	8	278	287	96.9	301	92.3	No stats	13
2018/19	182	96	0	278	287	96.8	299 (49)	92.9	111.2	32
2019/20	182	99	18	281	271	103.6	346 (48)	81.2	94.2	12
2020/21	182	82	4	264	290	91.0	285 (41)	92.6	108.2	12

Table 20**Religious Balance of the settings 2019/20 DE figures**

Funded Providers	No. of Protestants	% Protestants	No. of Catholics	% Catholics	No. of Others	% Others	Total
Enniskillen Nursery School	36	45%	23	29%	21	26%	80
Enniskillen Integrated Primary School NU	9	33.3%	11	40.7%	7	26.0%	27
Holy Trinity Primary School NU	*	*	43	81.1%	#	#	53
Squirrels Montessori	11	37%	14	47%	5	17%	30
Holy Trinity Pre-School	0	0	#	#	*	*	16
Tiny Tots	0	0	#	#	*	*	16
Mullanaska	0	0	#	#	*	*	26

Key: * <5

figure suppressed under rules of disclosure

NICIE has previously raised the matter of the assertion that Pre-school provision is non-sectoral with senior officials in the Department of Education in a paper in July 2017. Table 20, above, shows that whilst there is definite mixing in the Integrated Nursery Unit and some in the standalone Enniskillen Nursery School and in one of the community playgroups, the enrolment in the Holy Trinity Nursery Unit is predominately from the Catholic tradition. It is difficult then to state that pre-school is non-sectoral.

Impact on other integrated schools

Omagh Integrated Primary School and Nursery Unit is the nearest Grant Maintained Integrated provider – 26.8 miles between the two schools. (Google Maps) This is too far a distance for any increase in Enniskillen Integrated Nursery Unit to cause any impact.

Rationale for Proposal

- The desire for this development proposal has in part been led by parents of children attending Enniskillen Integrated Primary School as they want local, accessible integrated pre-school education for their children. Table 5 shows that there has been significant over-subscription for the existing nursery unit. There is no other integrated provision in the immediate area.
- Given that the **Programme for Government (PFG) Outcome 12** is targeting this area, it would seem that 'getting a good start' through high quality preschool would be particularly important. Outcome 12 aims to improve the quality of education as well as improving educational attainment.
- **PROXIMITY to SERVICES – Domain Rank (NINIS)**
The school want to provide a service to those children who are already disadvantaged with regards to services because of where they live. As Table 8 above shows, 35.6% of the children in P1-P7 come from SOAs which are in the top 200 SOAs for deprivation with regards to proximity to services. Over a quarter of the children (95, 26%) of the pupils come from the top 100 SOAs for deprivation regarding proximity to services. Enniskillen Integrated Nursery Unit currently has children from 12 wards across County Fermanagh therefore the school is fulfilling a need.

This has been particularly highlighted this year, and in the previous years, when the school had to refuse places in the Nursery Unit to families who have siblings in the primary school. The Nursery Unit and school are situated on the same campus – therefore these families who are disadvantaged by their proximity to services are further disadvantaged by travelling to different sites to access pre-school and primary provision.

- Approval for additional pre-school provision in the existing nursery unit would support families and parents who wish to access the highly sought after integrated provision from age 3 to 11 years in County Fermanagh. Across County Fermanagh – therefore only a small negative impact on local provision.
- The governors and staff recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding.
- Enniskillen Integrated Primary School and Nursery Unit are 'Outstanding' (ETI 2011 and 2014 and 2017)
- The school agrees with the argument all pre-school education should be 'integrated' but in reality, if statistics were gathered from pre-school providers this would not be the case. The school recognises no pre-school provider in this area discriminates on the grounds of religion but in reality, if a pre-school centre is attached to a school it will not be 'integrated.'
- Approval for this additional provision will assisting the Department of Education in meeting its duty to encourage and facilitate integrated education, as outlined in Article 64 of the Education Reform Order Northern Ireland 1989.

- Justice Treacy’s judgement on Drumragh IC in 2014 stated *‘It will be easier for dynamic decisions which are in line with long range plan (i.e. where sectoral take up remains proportionately the same) to be approved than dynamic decisions which are out of line with the long range plan (i.e. growth of one sector which has not been projected). It is by no means the case that these kinds of decisions will be impossible, but there will be an additional friction impeding their progress as compared to decisions in line with the long-term plan. The creation of an additional difficulty is the opposite of encouraging and facilitating.’*
- The Board of Governors and NICIE believe that DE having accepted in October 2017 that duty to encourage and facilitate extend to statutory nursery proposals to then use a variable factor as the presence of two year olds in other statutory settings as a deciding criterion constitutes *‘The creation of an additional difficulty (which) is the opposite of encouraging and facilitating.’* Especially when it is the Department’s failure to act to deal with the issue of underage children in the system over many years that has exacerbated the problem.

Educational Impact

Enniskillen Integrated Primary School and Nursery Unit has historically enjoyed a diverse enrolment.

The drive for this proposal has in part been led by parents who want accessible integrated education in County Fermanagh.

ETI has awarded Enniskillen IPS as Outstanding.

The staff, governors and parents recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding.

Approval for the additional pre-school afternoon provision in the existing nursery unit would support parents and families in County Fermanagh who wish to access this highly sought after integrated provision 3 – 11 years.

In bringing forward this proposal the school believes it is:

- Playing a role in moving towards a shared future for all
- Meeting the demand in County Fermanagh for integrated education

Table 21 in Appendix 2 shows the pre School Experience and Religious Balance – 2014/15 to 2020/21

It demonstrates that in the three years 2014/15,2015/16, 2016/17 to the introduction of the Playgroup at Enniskillen IPS in the 2017/18 there were substantial numbers of children coming into P1 with no pre-school experience. The numbers ranged between 5 and 11 with an average of 8 children per year. After the opening of the pre-school playgroup the numbers of children entering school without pre-school experience dropped to between 2

and 4 with an average of 2.25 children. This shows that parents are choosing to come to an unfunded integrated playgroup rather than not participate in pre-school education. This has to be a positive educational outcome for these families, most of whom are from Catholic or Other backgrounds.

As the Playgroup is now in its fifth year of operation, it would seem likely that it has already had any impact on the other settings that it is likely to have.

The average number of P1 children who attended the statutory settings of Enniskillen nursery and holy Trinity nursery unit in the three years prior to the opening of the playgroup was 6.33. Over the four years since the playgroup opened the average is 7.25, so in fact the number from these statutory settings has increased.

With regards to those P1 children who attended the voluntary playgroups the average number before the playgroup opened was 7.33 and afterwards 12.25.

Thus, the impact of the playgroup has not been negative on the other settings and this indicates that the proposed second session of the nursery would not be disadvantageous to the other settings but would help to reduce the number of children who have not received a pre-school education.

Rural Needs and Equality Impact assessment

This proposal is likely to have a positive impact on the rural area which Enniskillen IPS serves. See Rural drivetime map in Appendix1. The proposal, as it for an increase in integrated provision which also a positive impact for equality between the two main traditions.

Statutory Consultation

As submitted by Enniskillen Integrated Primary School

A significant level of consultation has taken place in respect of this development proposal and it is summarised on the front pages of this proposal.

- A steering group was established in January 2016, consisting of governors, staff and parents and this group has remained
- This steering group entered into discussion with NICIE during the Spring Term of 2016 and this has continued since the non-approval of their Development Proposal 2016-2017 and their non-approval again in 2019.
- The Board of Governors recorded their agreement to submit this Development Proposal at their meeting in May 2020 and again in November 2020 – however the Nursery Development Proposal has remained as a constant on The Board of Governor Meeting Agenda

- NICIE provided information to this group
- Parents were formally surveyed in June 2020 and again in December 2020
- Of the % return on all consultations – 100% of these in support of this development proposal
- NICIE is fully supportive of taking this development proposal forward
- IEF is fully supportive of taking this development proposal forward
- The School Principal and Chair of The Board of governors met with Mr Baker in September 2019 and stated the school would be resubmitting again

1. Implementation Plan (if the proposal is approved)

This proposal has an effective date of 1st September 2022.

There are no initial capital requirements in the development proposal. The plan would be for a dual day with an afternoon session complimenting the morning session in the existing nursery unit at Enniskillen Integrated Primary School.

There will be no displacement of staff.

2. Resource Implications

The school does not predict major resource implications for operating a dual day.

Approval would allow for maximisation of the existing capital investment of the current nursery building. DE had no initial capital investment. It has been argued it is 'unfair that one sector should be allowed to grow and operate in deficit while others are being held back' but the school believes it is unfair they did not have initial capital investment to facilitate and encourage integrated education.

There will be no additional transport costs with this proposal as pre-school children are not entitled to home to school transport.

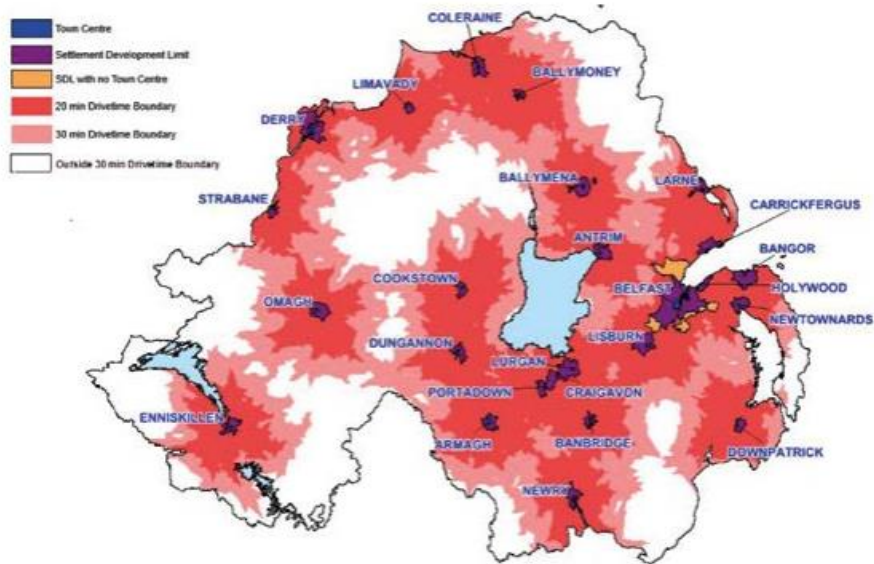
Additional funding will be required for salaries and overhead costs but this would be quite small as it would be within the budget allocation given for the additional pupils in the afternoon.

The approval of this Development Proposal has minimal implications financially for The Department of Education's budget if taken in context as an approval with no capital investment.

Appendix 1 – Rural Needs Act (NI) 2016

A Guide to the Rural Needs Act (NI) 2016 for Public Authorities
(Revised) April 2018

Map 2: Comparison of 20-minute and 30-minute drive-time boundaries



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Table 21 P1 Intake – Pre-School Experience and Religious Balance – 2014/15 to 2020/21

Year		Name of Setting	No of Children	Community Background			Total No Admitted
				P	C	O	
2020/21	Statutory	EIPS Nursery and Playgroup	48	11	28	9	62
		Holy Trinity & Enniskillen Nursery	8	1	1	6	
	Voluntary	Squirrels, Tiny Tots etc	6		3	3	
	Private Daycare						
	No Pre-School Experience						
2019/20	Statutory	EIPS Nursery and Playgroup	29	12	12	5	52
		Holy Trinity & Enniskillen Nursery	9	2	5	2	
	Voluntary	Squirrels, Tiny Tots etc	11	4	4	3	
	Private Daycare						
	No Pre-School Experience	3			3		
2018/19	Schools	EIPS Nursery and Playgroup	39	12	23	4	61
		Holy Trinity & Enniskillen Nursery	7		6	1	
	Voluntary	Squirrels, Tiny Tots etc	11	3	7	1	
	Private Daycare						
	No Pre-School Experience	4			4		
2017/18	Schools	EIPS Nursery and Playgroup	26	12	12	2	56
		Holy Trinity & Enniskillen Nursery	5	2	2	1	
	Voluntary	Squirrels, Tiny Tots etc	21	8	9	4	
	Private Daycare						
	No Pre-School Experience	2			2		
2016/17	Schools	EIPS Nursery	24	10	10	4	44
		Holy Trinity & Enniskillen Nursery	9	2	7		
	Voluntary	Squirrels, Tiny Tots etc	5	2	3		

	Private Daycare					
		No Pre-School Experience	8	1	1	6

2015/16	Schools	EIPS Nursery	27	9	11	7	45
		Holy Trinity & Enniskillen Nursery	3	2		1	
	Voluntary	Squirrels, Tiny Tots etc	7	4	2	1	
	Private Daycare						
		No Pre-School Experience	5	3	1	1	
2014/15	Schools	EIPS Nursery	26	14	9	2	55
		Holy Trinity & Enniskillen Nursery	7	2	3	2	
	Voluntary	Squirrels, Tiny Tots etc	11	5	5	1	
	Private Daycare						
		No Pre-School Experience	11	2	6	3	

2014/15 was the first year of the double intake approval
2017/18 was the first year of operation of the Playgroup


Appendix C

DP 664 Enniskillen IPS

Support – 31 Responses

Respondent	Comment
Erne IC BoG	<p>Main reasons for support are:</p> <ol style="list-style-type: none"> 1. The Continued demand for Integrated Pre-School education 2. The next nearest Integrated Nursery Unit is Omagh 3. The continued high rate of applications for EIPS Nursery Unit - oversubscribed year on year for children in their immediate Pre-School Year 4. Parental choice due to the increase demand for integrated education 5. Double nursery class feeds into a double Year 1 intake 6. Location on Enniskillen Integrated campus allowing a streamlined approach to integrated education. 7. Feeder school for both Primary and Post Primary Schools - 99.9% of pupils transfer to primary school 8. Use of existing buildings and staff - limited cost involved for DE 9. An outstanding ETI Inspection report 10. The nursery would be at the heart of the community 11. DE making huge investment at the minute on an extension.
Principal of Lough View IPS	<p>There is a clearly evidenced need for further provision of pre-school places within the Integrated Sector in the Fermanagh Area.</p> <p>It is unreasonable that siblings of children attending the Primary School would not be able to be placed. It is very unusual for a school with an approved double intake in the Primary School to have a single session nursery, presumably for this reason. These additional places have been funded by the school for almost 5 years with no detrimental effect on pre-school provision in the surrounding area.</p> <p>The Department should continue to be mindful of their obligation to facilitate Integrated and Irish-Medium Education when considering their decision to this proposal.</p>
Governors	<p>There is a clear demand for places with 49 applicants for 26 places for the September 2020 intake and 51 for the September 2021 intake.</p> <p>An afternoon nursery session will also support the Department's £6 million investment for an extension to the existing school building to provide accommodation for two classes per annum as nursery children progress to P1.</p> <p>The school's award of an 'outstanding' grade following inspection demonstrates the quality of teaching and care provided at the school and nursery.</p> <p>Many families who wish to join the school community cannot do so due to the current restriction to 26 places, particularly in light of the absence of alternative schools with integrated status in the area.</p> <p>I..supported the Good Friday Agreement which clearly states that Integrated Education should be facilitated and encouraged. This is an opportunity to deliver in a small way on what was agreed.</p> <p>Currently our Nursery Unit has 26 Part-Time places, it is very clear that this number does not even come close to accommodating the amount of parents applying for a space for their child.</p>

Respondent	Comment
	<p>The sad thing is these parents who were choosing Integrated Education are being turned away into another sector not of their choice.</p> <p>We have the capacity to admit another group of 26 in our fit for purpose building.</p>
Staff	<p>In a progressive society there should be no segregation of our children according to their cultural beliefs, backgrounds, or experiences.</p> <p>As it stands, with Enniskillen Integrated Nursery Unit being the only integrated nursery provision in County Fermanagh, it is shocking to think that only 26 parents currently have access to this freedom of choice!</p> <p>As the demand for an Integrated Education continues to grow, so to does the school, the successes of which are evident as we watch not only the school community, but the building itself grow!</p>
Jemma Dolan, MLA	<p>This afternoon session has been operating already for five years, funded by The Integrated Education Fund and The Western Area Charitable Trust for Integrated Education.</p> <p>A long history of over subscription- with the ongoing extension to accommodate their double enrolment, the double nursery admissions is vital to maintaining this huge investment.</p>
Parents and Other Relatives	<p>If my Son didn't get the place I wouldn't be sending him to Nursery School at all as I am only interested in integrated education.</p> <p>There is clearly demand. Parents should have this choice.</p> <p>The only way the mindset of N.I children will change is introducing them to children of all religions and beliefs from a young age - recruiting children to be the peacemakers of a society that has suffered through the years of lack of integration.</p> <p>I am very aware many parents are continuously dissatisfied and disappointed at not receiving a place in Integrated education.</p> <p>26 small places will give 26 families more choice in making the best possible decision for their little ones in relation to enjoying an enriched, united school experience of various cultures, backgrounds and religions - all learning together in the heart of our Fermanagh community.</p> <p>We believe every individual should be aware of their own culture and traditions and that of others and there should be mutual respect for everyone's differences and diversity to promote a more integrated society.</p> <p>The best time to start this is at the very beginning of a child's education journey.</p> <p>It is genuinely concerning that at present there are only 26 funded statutory part time places for integrated education in Fermanagh.</p> <p>Providing our children with an integrated education is the foundation of building a more respectful and reconciled society.</p> <p>The amazing leadership in this school is reflected in the sense of belonging and school spirit that radiates in the atmosphere as soon as you go through the school gates.</p> <p>I am so grateful that we even got an afternoon slot as it meant that my daughter was able to start her education in the integrated setting.</p> <p>They have been turned down several times which I cannot comprehend when the demand for places is obvious.</p> <p>The Integrated Primary School became double enrolment to cope with the demand (but still over-subscribed), we feel the nursery should be the same. Makes moving to primary 1 much easier with familiar faces from nursery.</p> <p>Enniskillen as a community can only benefit from the increased provision of such nursery school places.</p>

Respondent	Comment
	<p>It is an education pathway parents want, and it would be an absolute failure of the Department of Education to deny this choice.</p> <p>The availability of preschool integrated education places is important to help attract new families to Fermanagh, to grow a community that has suffered from population decline.</p> <p>They have chosen the values of integrated education, to have their children educated side by side with children from all backgrounds. To foster life-long cross community friendships.</p> <p>The fact that only 26 spaces is being asked of I feel is too little for the whole county.</p> <p>I feel a shared future in Northern Ireland begins with our children.</p> <p>I did not want my children to attend any other sector in Northern Ireland but this choice was taken away from me due to the small amount of places awarded to this ETI Outstanding Nursery Unit.</p>
Others	<p>I cannot quite believe that my local (Enniskillen) integrated nursery (Proposal 664) has fallen through due to the fact that we had no Education Minister. Is this fair for the future of integrated nursery children to have to beg for funding for their afternoon nursery session?</p> <p>These nursery children are our future generation, who will look after us when we're old. Make it possible for us to educate our children and celebrate our differences as well as helping them to become the very best version they can be. Enniskillen is a large catchment area and Enniskillen Integrated Nursery is always oversubscribed.</p>
NICIE	 <p>Enniskillen IPS NU NICIE Commentary fi</p>

Objection – 36 Responses

Respondent	Comment
Deborah Erskine, MLA	<p>Many of the other educational establishments within the area have expressed substantial concerns regarding this proposal. Significant issues in relation to the decline in birth rates in Fermanagh in recent years and how this will have a subsequent impact on any potential school intake in 2022/2023.</p> <p>It is not fair that one educational establishment will be able to claim a larger percentage of potential intake, whilst the overall intake is in decline.</p> <p>I have grave concerns about what this development proposal would mean for the future sustainability of other education establishments in the area.</p> <p>It has also come to my attention that the numbers used to justify their proposal are being misrepresented... in an attempt to present an argument that there are changing demographics within the area. However, this simply is not an accurate reflection. . Indeed, the area demographics have not changed from 2017 or 2018, when both previous development proposals were rejected. Some children are attending nursery in the morning with a PEG place and then attending the Integrated Nursery.</p>
Enniskillen Model PS	<p><u>Integration</u> –The staff of this school are highly supportive of ‘integrated’ education and take great pride in running what is in essence a very integrated and inclusive school, as verified by its pupil, parent and staff population. Diversity has always been a strong feature of the school’s intake/enrolment and has been consistently and widely promoted for nearly 155 years by the governors, staff, parents and Parent Teacher Association. A well-embedded shared education programme (which we have maintained regardless of funding and other more recent pressures imposed upon us such as COVID-19. We are keen that cognisance is given to the uniqueness of Enniskillen/Fermanagh and in deliberating this proposal (which we assume will be irreversible) that thoughts are very much contextualised/localised - not linked to other areas in Northern Ireland where there is potentially a greater need to develop further community relations/’Integrated or integrated’ education/shared education.</p> <p><u>Demographics</u> - The governors are very concerned about the impact of the growth in one sector to the detriment of others given that population projections show a decline in pre-school/primary numbers in this area and especially so for the current and incoming years.</p> <p>This inevitable impact on the sustainability/viability of other establishments is therefore of concern in the short and long term.</p> <p>Nothing demographically has changed since 2017 and 2019 when previous development proposals were declined.</p> <p>Set amidst the recent consultation on the option for parents to defer the school starting age for younger pupils in a school year surely there is a greater need to also consider the longer term impact of this prior to making other changes such as what is now being proposed.</p> <p>There have been some reports circulating in recent years about the accuracy of statistics in relation to pre-school numbers and the recording procedures being used. If verified, this is concerning in that a false picture could be misleading.</p> <p><u>Budgetary concerns</u> - Cognisance needs to be given to the challenging financial climate schools like this find themselves in.</p> <p>Thanks to recent Department of Education investment, we are housed in a lovely new school. Sustaining that investment is key and it would be folly not</p>

Respondent	Comment
	<p>to try and maintain this in the years ahead, especially if there are additional pressures such as a decline in demographics.</p> <p><u>Fairness</u> - In contrast to what is stated in this new proposal, it is not unusual to have a primary school without pre-school provision on site. Parents should have the right to choose their child's primary one educational route regardless as to what pre-school setting they have attended. Forcing some existing pre-school providers into having to enrol penultimate age children to sustain numbers creates a big problem. All pre-schools and controlled schools have an ethos which allows for and fosters diversity.</p> <p>A change to how a similar/declining number of pre-school places are allocated/ determined in the future will lead to a discriminatory policy and an ever widening impact on relationships, finance, fairness and competition.</p>
Enniskillen Model PTA	<p>Enniskillen Model is a very diverse and integrated school. A huge consistent community spirit is engendered by the school as evidenced by a wide array of events. We have worked alongside St Patrick's, Mullanaskea – such links have involved Shared Education programmes. The schools have also worked on a lot of culture and identity issues and designed and shared a float at a St Patrick's day parade (pre-Covid). 80+ newcomer pupils mix well with a wide collection of children from different religions and backgrounds. Enniskillen Model is integrated in all but name as indeed is Enniskillen Nursery. I am acutely aware of the ongoing battle with funding each year.</p>
Enniskillen Nursery School	<p>On 21 October 2020, the Education Minister said that there needed to be "Clear and compelling new evidence" in order for any new DP to be brought forward. Enniskillen Nursery School Board of Governors see no new clear and compelling evidence in DP 664.</p> <p>DP 664 states that there is population growth in the Fermanagh and Omagh Council District and that there is no overprovision in the area.</p> <p>The population in Fermanagh and Omagh district is not increasing but declining. There has been a 6.3% DECREASE in the 0-3 age group over the last 10 years. In the last two years there has been a 4.7% DECREASE. NISRA population projections predict a steady decline in the birth rate for Northern Ireland with a 12% decline in the 0-4 age group by 2031. The ever present problem of over provision is only going to increase.</p> <p>It is disingenuous of the case for change to state that the use of underage children as a criterion is unreliable as it has been demonstrated that there is a declining birth rate in the district and the issue of under age children will only continue.</p> <p>As NICIE has been funding an afternoon playgroup at Enniskillen Integrated Primary School, Enniskillen Nursery School has lost pre-school pupils to this playgroup and there are not enough pre-school children in the area to replace them. This goes against DE policy to not "<i>displace good quality pre-school education already in existence with pre-school education in an alternative setting</i>".</p> <p>It has also led to dual placement of pre-school children with some children attending either the full time or morning part time session in Enniskillen Nursery School and then attending the afternoon playgroup session at Enniskillen Integrated Primary School Nursery Unit.</p> <p>DP 664 states that Enniskillen Nursery School had only 6 underage children in 2020/21 when in fact we <u>had 9 and this year (2021/22) we have 20 underage children</u>.</p> <p>Overprovision not an "<i>effective and efficient use of public funds</i>"</p>

Respondent	Comment
	<p>it also has an effect on the educational outcomes of pre-school children when educated together as expressed in the ETI Chief Inspector’s Report (2018): <i>“The children’s progress in personal, social, emotional and language development is restricted where the pre-school children are learning alongside underage children and particularly when they are in a group where the underage are the majority.” (p.55)</i> <i>“Where there is a large number of underage children in a class...the demands placed on the practitioner to provide a quality pre-school programme is restricted and, as a result, the children do not make as sure a start as expected. The continued growth in the number of nursery units poses a challenge for pre-school area based planning.”(p.17)</i></p> <p>Enniskillen Nursery School Board of Governors notes that DP 664 refers to the commitment of Enniskillen Integrated Primary School to the Shared Education Partnership, of which we are the lead school. Unfortunately, the over provision of pre-school nursery places caused by Enniskillen Integrated Primary School’s afternoon session has meant that it is no longer viable to continue in the Shared Education programme as it is not appropriate for two year olds to be involved in. This has caused us great sadness as Enniskillen Nursery School remain fully committed to the principals of Shared Education. Enniskillen Nursery School is a naturally integrated educational provision that includes a successful and smooth transition to P1 for all our pupils. If another Nursery Unit, attached to a Primary School, is given additional places then Enniskillen Nursery School and its pupils could be discriminated against. Often, criteria for selection to Primary Schools include attendance at the attached Nursery Unit which means that children attending Enniskillen Nursery School would not be eligible for that criterion and we feel that they would be disadvantaged.</p> <p>The continued Development Proposals by Enniskillen Integrated Primary School creates an increased workload for the Principal of Enniskillen Nursery School, threatens the viability of the outstanding pre-school educational settings already offered in the area and has already damaged school community relations.</p>
BoG Jones Memorial PS	<p>JMPS recognises the potential for this proposal to impact negatively on the sustainability of our feeder nursery providers and local primary schools. Welcomed the Department of Education’s decision in May 2017 and in April 2019 based on the evidence that there was sufficient (PEG assessed, non-sectoral) pre-school provision in the area.</p> <p>It is not apparent from the case for change that additional or new information is presented in support of the latest proposal. This year’s enrolment data shows displacement of pupils within our immediate catchment to the Integrated sector. Large class sizes at this time is not an appropriate use of monies to help pupils recover from their social and educational deficit due to Covid-19. Recognise the role of the Education Authority (EA) and of the Pre-School Education Group (PEG) in planning for pre-school educational provision. The BoG note the strong concerns expressed by PEG. As a partner school in Peace IV and Extended Schools cluster across all sectors this highlights that EIPS is not the only or best way to promote this. Concerns in relation to the increased costs for provision, which is already in excess of demand, is also very alarming. Acknowledge the Department’s statutory duty under Article 64 of the Education Reform (NI) Order 1989 however, the duty, under Article 44 must also be considered.</p>

Respondent	Comment
	<p>Under the Shared Education Act, 2016, the Department of Education also has a duty to encourage, facilitate and promote shared education. Currently JMPS are partners in an extremely successful shared education programme operating in Enniskillen which incorporates partnerships from the maintained, integrated and controlled sectors. Additionally, JMPS and Holy Trinity Primary School have been partaking in a program within Peace IV for over 4 years and both schools have a strong positive working relationship established between the different sectors. The shared education programmes, inc Extended Schools Cluster and Peace IV, has been extremely beneficial in encouraging young people to work together to overcome barriers.</p> <p>If approved, this proposal has the potential to put strain on the pre-school providers in the area and could be divisive and create competition between pre-school settings. Consequently, this would be detrimental and could threaten the very successful and valued shared education programme that currently exists.</p> <p>The case for change states that the inclusion of the Reception Class as an alternate preschool provider should not be taken into consideration based on the learning to Learn 2013 document is irrelevant as this has not been legislated to date.</p> <p>The displacement which this new provision offers is at odds with the Department's practice to not displace good quality pre-school provision. Statutory, voluntary and private providers of pre-school education in the Enniskillen area including our Reception class are known to deliver pre-school education that is based on tolerance, respect and understanding for children from backgrounds of all faiths and none. JMPS is naturally integrated.</p> <p>NISRA population projections for the Fermanagh and Omagh area for the period 2016 – 2041 predict a 14% reduction in the 0-4 age group from a total of 7730 to 6623. There is over-provision of pre-school provision at present. The school understands that penultimate aged children may have been placed in the afternoon playgroup session at Enniskillen Integrated Primary School which further highlights the over-provision of pre-school education places.</p> <p>If this proposal is agreed, the Department of Education would have to consult with the Department for Infrastructure as traffic congestion from the single site entrance on the Cornagrade Road will produce extra congestion at peak times.</p> <p>DP 664 indicates that 85% of the pupils availing of Enniskillen Integrated Nursery are from outside the immediate locality and would require an excessively lengthy journey time for children of nursery age and may have a detrimental impact on their learning experience.</p> <p>The appropriateness therefore of transporting children, under the age of 5 such long distances on rural roads is very questionable.</p> <p>Afternoon pre-school sessions are not as popular as the morning sessions. Questionable how many children would attend the afternoon session if established.</p> <p>The case for change states that seven applicants who had either brothers/sisters enrolled in Enniskillen IPS were refused a place. As there are sufficient pre-school places in the area this issue is one that can be addressed through the school's admission criteria rather than creating duplication of provision with an increase in nursery places.</p> <p>The majority of playgroups do not come under the management of primary school principals and to this end this situation has been established by the management of the school.</p>

Respondent	Comment
	<p>The procedures in the Enniskillen area to facilitate the transition from Pre-school to Primary 1, have been developed by all the local pre-school providers through a shared education project and are not specific to Enniskillen Integrated Nursery Unit.</p> <p>There is a steady decline in [birth rates] in the past 4 years.</p> <p>The BoG feel that this will result in a surplus of spaces that will become available putting pressure on the existing estate.</p> <p>Children who bypass local provision will require transport from across Fermanagh to attend the Integrated Primary School and this may result in displacing the enrolment of local primary schools.</p> <p>We take our duty to encourage, facilitate and promote shared education (Shared Education Act NI, 2016) very seriously through the activities we undertake and the positive outcomes from these.</p> <p>There is no additional evidence provided to support the Case for Change and therefore the previous rationale for refusal, in respect of DP No 488 & 543 should be re-iterated and be the response of the DE regarding DP 644.</p>
Associates of Jones Memorial PS	<p>We are very concerned about longer travelling distances for younger pupils – Nursery children should only be travelling a maximum of 3 miles. Jones Memorial has the capacity to provide for a greater number of pupils and is integrated in all but name. The potential growth of the school may adversely affect the sustainability of other schools in the area. Financially this makes no sense.</p> <p>It is starting to feel that EIPS are seeking to be the biggest and best in town and this is to the detriment of other very good schools. We support fairness and equality – no school should keep getting and getting to the cost of another. Bigger nurseries lose the family feel that makes them special.</p> <p>Jones Memorial has been part of our family circle for over 50 years.</p> <p>It is all about achieving balance and ensuring that no one sector is gaining unfair advantage over another.</p> <p>EIPS is not the only integrated school in Enniskillen.</p> <p>This move by the IPS is an attempt to ensure they have the ‘lion’s share’ of the children in the Fermanagh area.</p>
Magic Roundabout Childcare and Day Nursery, Jelly Tots Mother and Toddler Group and 9 th Avenue	<p>It is very obvious that once parents choose a nursery for their child they are reluctant to move them to another primary school. Why build or create new places when ourselves and Jones Memorial can offer those places already? This is financially nonsensical. Jones Memorial is integrated in all but name. The potential growth of EIPS may adversely affect the sustainability of other schools in the area. If parents choose to travel across town, we will lose out. It is financial suicide in a business to duplicate resources. The local primary school offers places to all.</p>
Local Businesses	<p>We are very worried about lack of passing trade/ fall in enrolment – if the proposal goes ahead Jones Memorial may lose families that will go into town. Jones Memorial is integrated in all but name. The potential growth of EIPS may adversely affect the sustainability of other schools in the area.</p> <p>Jones Memorial has the capacity to provide for a greater number of children - It is starting to feel that EIPS are seeking a monopoly in the town. Financially this makes no economic sense. It is all about achieving balance and ensuring that no one sector is gaining unfair advantage over another.</p>
<u>Others</u>	<p>It does not make sense to create additional places when other schools have availability to provide for local children. We are against it for a number of reasons:</p>

Respondent	Comment
	<ol style="list-style-type: none"><li data-bbox="584 253 1342 286">1. The creation of additional places makes no financial sense:<li data-bbox="584 320 1358 353">2. Asking Nursery children to travel a distance is unacceptable:<li data-bbox="584 387 1174 421">3. Other schools are integrated in all but name;<li data-bbox="584 454 1023 488">4. Birth rates have been in decline;<li data-bbox="584 521 1430 600">5. It is important to continue to support our local schools in the local community;<li data-bbox="584 633 1485 712">6. The growth of larger, potentially more impersonal schools may lead to job losses and loss of confidence.
CSSC	Reproduced below

NICIE COMMENTARY



Response to Public Consultation Regarding Development Proposal 664:

‘Pre-school provision is expanded at Enniskillen Integrated Primary School through the establishment of a single pre-school afternoon session to provide 26 part-time places with effect from 1 September 2022, or as soon as possible thereafter.’

Introduction

Generally, when an Integrated primary school was established, parents then began to work towards the setting up of a pre-school facility. These were often staffed by the nursery teacher and assistant(s), however owing to the prohibition under the 1989 Education Reform Order; no Integrated nursery could receive government funding. The facilities were then funded from charitable grants and parental subscription. This represented a substantial sacrifice with regard to continuous fund raising and extra work and commitment on behalf of the whole school community including the Board of Governors (BoG).

When European Peace and Reconciliation funding became available, some groups were able to access this but had to register with the DHSS as playgroups even though they had nursery teachers and staff. The first tranches of Pre-school Education Advisory Group (PEAG) funding were also only available if the facility were registered as a playgroup.

The 1998 Education Order removed the prohibition on Integrated schools having Integrated nursery units. At the same time, the Pre-school Education Expansion Plan was making significant capital available to the statutory sector to provide nursery units. The Integrated sector already had several pre-school settings, so the capital required to bring them up to DE Handbook standards was much less than that required to develop entirely new buildings. The policy within the Department of Education and conveyed to NICIE by senior officials was that if a playgroup had a

substantial number of PEAG funded places it could then be transferred across to nursery status units using the normal development proposal and economic appraisal process.

From September 1999 onwards a dozen pre-schools were transferred to nursery status as the funded places grew in each setting. The capital from the Pre-school Education Expansion Plan was used to provide, in the main, small alterations to most settings. This represented an inexpensive way for the Department of Education to reach its target of 50% of places in the statutory sector and 50% in the voluntary sector. As of September 2021, a total of 17 Grant Maintained Integrated primary schools will have nursery units. Of the Controlled Integrated Primary Schools, six have nursery units. Currently there are 5 integrated playgroups in GMI schools. Of the Controlled Integrated Primary Schools, there are 3 playgroups co-located within the grounds of the schools.

The Integrated sector has never been able to have a pre-school nursery unit established alongside a new school. In the past, PEAGs have not been able to consider newly established schools until they have a track record of Primary 1 children, as these children were used as a proxy for pre-school children. This route of building up funded pre-school places within a setting has been the only route to nursery unit establishment within the Integrated sector until Ministerial approval for the establishment of a GMI nursery unit at Phoenix IPS in 2014.

It should be noted that only four of the GMI settings have achieved full-time places. The first of these is Saints and Scholars, where the reception class was converted to full-time places. In 2009, the first of the nursery units transformed from playgroups, were granted a change in pattern of attendance from part-time to full-time provision (Windmill IPS, Hazelwood IPS and Mill Strand IPS). The remainder of settings only have part-time places. This disadvantages those settings located in areas where the nursery schools and units surrounding them have, through application to DE's open enrolment section, rationalised their two part-time sessions to one full-time session. This creates an uneven playing field for the Integrated schools which can only offer part-time places compared to the other sectors' full-time provision. We are aware that there is a moratorium on full-time provision currently.

The importance of a sustainable pre-school service and early intervention was highlighted by the Chief Inspector's Report 2012-2014.

Despite the problems that managing playgroups have presented to Boards of Governors and Principals, Enniskillen IPS and others have remained committed to the provision of Integrated pre-school because they are aware of the importance of children having positive experiences of Protestant, Catholics and others from different backgrounds from as early an age as possible, as shown by Professor Paul Connolly's research. It is also noteworthy that Integrated primary schools often attract a higher percentage of children with special needs and historically access to assessment and support has been much more difficult to obtain in a playgroup setting than in an established nursery. Specialist provision in mainstream has been given to a number of Integrated primary schools for 2021-22.

NICIE submitted a paper to DE officials in July 2017 outlining the implications of pre-school policy on the development of Integrated pre-school provision. Subsequently, DE wrote to EA and CCMS on 31st October 2017 to point out, *"It is important the Education Authority and the Pre-School Education Group (PEG) support the department in fulfilling its statutory duty by striving to meet **demonstrated parental demand** in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish-medium pre-school education."*

In a further letter on 15 January 2018, DE referred to the Drumragh Judgment and Justice Treacy's comments that the statutory duty applies to Integrated education as a standalone concept as defined in the 1989 Education Reform Order rather than religiously mixed provision more generally. The letter also referred to the displacement concept and said that this needed to be balanced with the context of statutory obligations.

Non-sectoral nature of pre-school provision

A founding premise of the Pre-school Education Expansion Plan was that pre-school provision should be non-sectoral in nature, i.e. any setting should be capable of being attended by a child from any background comfortably.

Whilst the Department of Education has often asserted that pre-school provision should be non-sectoral, the Department's own statistics show that the reality is that

few Catholics attend Controlled nursery units and schools and even fewer Protestants attend Catholic nursery units and schools.

In 2020/21, only 40 Protestants attended Catholic Maintained Nursery Schools which offered 1725 places (this represents 2.3%); 81 Protestants attended Nursery Classes in Catholic Maintained schools which offered 4000 places (2.0%). The figures for Catholics attending Controlled Nursery Units are 539 out of 4591 places (11.7%). However, if one looks closer, it is clear that this mixing is mainly happening in those controlled nursery schools, which pre-date the Pre-School Education Expansion Plan. (1141 out of 4110, 27.8% Catholic). This mixing in the nursery schools has prompted two applications to Transform from Brefne Nursery School and Bangor Central Nursery School. Brefne Nursery School Transformation was approved by the Minister on 9 June 2021 and Bangor Central Case for Change still awaits a Ministerial decision.

On the other hand, Integrated Nursery provision (GMI and Controlled), demonstrates figures of 30.0% Protestant and 36.0% Catholic in 2020/21. These latter statistics, in the integrated and some (see below for numbers) of the older controlled nursery schools, are the only settings which we believe represent non-sectoral nursery provision.

Referring to the 2020/21 Department statistics and using the minimal value of at a religious least 10% Catholic and 10% Protestant as a basic measure, the statistics reveal the following:

- Twenty-eight out of the 95 existing nursery schools have a religious mix of at least 10% Catholic and 10% Protestant, this is a total of 29.5%
- Forty playgroups out of a total of 383 have a religious mix of at least 10% Catholic and 10% Protestant, this is a total of 10.4%. If one discounts the PEG funded integrated playgroups, then 9.7% of playgroups meet this minimal level of mixing.
- Using the 2020/21 Census figures, 40 out of 248 nursery units, i.e. 16.1% have a mix of both at least 10% Catholics and 10% Protestants. If one discounts Integrated nursery units, just 9.3% of nursery units achieve this balance.

Given these statistics, there is little evidence that pre-school provision is in fact non-sectoral despite all assertions that it is or should be non-sectoral.

Introduction to Enniskillen IPS pre-school provision

The bomb which exploded at the War Memorial in Enniskillen in November 1987 instantly killing eleven people, another was to die later, was the catalyst for the formation of Enniskillen Integrated Primary School.

A public meeting was held in November 1988 to gauge the degree of support for such a venture and following this well attended meeting, a committee was formed, which with the help of the Northern Ireland Council for Integrated Education and many parents, succeeded, after a great deal of effort and hard work, in opening the school in September 1989.

In early 1997 at a meeting of WACTIE (Western Area Trust for Integrated Education) the directors discussed the idea of establishing an Integrated nursery unit. This was spearheaded by the late Mr. Bill Barbour and all involved in WACTIE believed an Integrated nursery unit was essential for the growth of Integrated education in Fermanagh. The Nursery Unit opened in temporary premises in 1997, moving to a permanent building on land acquired by WACTIE, in 1998. The nursery unit is in the unique position of being on the same campus as both the primary school and Erne Integrated College.

The school believes that Enniskillen Integrated Nursery Unit was the first free nursery provision in Fermanagh. This was made possible due to grants from The European Funds for Peace and Reconciliation, DHSS and The Integrated Education Fund. GMI Status was granted for Enniskillen Integrated Nursery Unit in 2000 – awarding the Nursery Unit 26 Part-time places. This was not comparable with the provision offered to other nursery providers in the ward as they were granted full-time provision. In September 2014, Enniskillen IPS commenced two classes at P1 to deal with the oversubscription at entry level. This proposal was approved by the then Minister of Education, John O'Dowd in February 2014. In 2016, the school further expanded pre-school provision by the addition of an independently funded playgroup to alleviate the high level of oversubscription in the Nursery Unit.

Current Proposal

The Board of Governors of Enniskillen Integrated Primary school proposes to establish an afternoon nursery session for 26 children (Part-time) within the existing

nursery unit with effect from 1 September 2022 or as soon as possible thereafter. This is the third proposal for this change. Previous proposals for additional nursery provision at Enniskillen IPS was refused on 11th May 2017 and 2nd April 2019.

Enniskillen IPS is seeking this change in order to meet parental demand for integrated pre-school provision in the area. The demand for Integrated education is demonstrated by the tables below. The school was granted a Development Proposal for new form entry in 2014. This resulted in a Enrolment number of 326 and an Admissions number of 56. Adding in the 26 nursery places would result in 352 places and the table below shows that the Enrolment number has been exceeded every year since 2017/18. This is a sustainable school with two-form entry primary school with an over-subscribed single form entry nursery unit. The total enrolment figure for 2020-21 was 418, which is 66 over the schools approved enrolment number. It is also important to note that Enniskillen IPS was granted a Learning Unit for Specialist Provision in mainstream in 2021.

Table 1 (Update of Table 3 from Case for Change) Enrolments since 2009

Academic Year	Enrolments
2009/10	244
2010/11	244
2011/12	246
2012/13	259
2013/14	272
2014/15	299
2015/16	317
2016/17	337
2017/18	358
2018/19	393
2019/20	397
2020/2021	418

Source NICIE and DE Includes 26 nursery places
 Current approved enrolment 326 and admission number of 56 plus 26 place nursery unit
 Two form entry approved 2014
 2020/21 NU admitted 27 not 26 (approved admission figure)
 Figure for 2021/22 not available as yet.

Table 2 (Update of Table 4 in the Case for Change) Applications and Admissions to Primary 1 Source (EANI)

Year	Total Applications	Total Admissions
2017/18	54	54
2018/19	62	62
2019/20	50	50
2020/21	73	61
2021/22	45	45

Figures exclude stated children

The admissions to Primary 1 seem to follow a familiar cyclical nature of over-subscription one year followed by fewer applications the next year. Anecdotally we are aware that parents are deterred from applying after a year of heavy over subscription, as they believe it is unlikely that their child will get a place.

Table 3 (Update of Table 5 in the Case for Change) Applications and Admissions to Enniskillen Integrated Nursery Unit 2012-2021

Academic Year	1 st Preference	Total Applications Including 2 nd /3 rd /4 th /5 th preference and LATE applications	Total Admitted
September 2021	52	65	30 TF
September 2020	49	59	26
September 2019	65	77	26
September 2018	47	48	26
September 2017	44	47	26
September 2016	46	58	26
September 2015	32	54	26
September 2014	32	53	26
September 2013	37	59	26
September 2012	48	63	26

Parental demand for Integrated nursery provision has been demonstrated very clearly year on year. The figures show that the school could have easily filled a second

session on total applications in eight of the last 10 years and in two out of the last three years with first preferences alone.

It is important to note that in September 2021 Enniskillen IPS got a Temporary Variation of places for 4 children. Part of the basis for this was the level of over-subscription and the distance to other integrated provision at Omagh (26.8 miles) and Windmill (41.2 miles) IPSs.

The Education Reform (Northern Ireland) Order 1989 Article 64 states – ‘It shall be the duty of the Department to encourage and facilitate Integrated Education, that is to say the education together at school of Protestant and Roman Catholic pupils’.

The Department of Education’s duty towards Integrated Education in a Pre-School context was further reinforced in the submission to the Permanent Secretary from the Area Planning Policy & Shared Education Campuses Team regarding a Nursery Unit Development Proposal for Drumlins Integrated Primary School in 2019:

‘DE guidance, informed by legal advice and case law, has confirmed that the Article 64 duty applies equally to pre-school education and that pre-school provision at an Integrated setting is distinct from other forms of pre-school provision. The extent of overprovision in this area is a concern, as are the attendant cost implications, but with the nearest alternative pre-school provision at an Integrated (and fully subscribed) setting located around six miles away, the evidence appears sufficiently compelling in favour of responding positively to evidenced parental demand for more pre-school provision at an Integrated setting in support of the Article 64 duty.’⁵

Update on the Compelling New Evidence Section of the Case for Change

Table 4 - Birth Rates across the Local Government Districts (Update of Table 14 of the Case for Change) Resident Live Births in Local District Councils 2014-2019

Area	Year					
	2014	2015	2016	2017	2018	2019
Antrim & Newtownabbey	1,774	1,796	1,759	1,665	1,630	1,662
Armagh City, Banbridge & Craigavon	2,920	2,977	2,943	2,869	2,840	2,743
Belfast	4,619	4,584	4,593	4,188	4,270	4,197
Causeway Coast & Glens	1,706	1,722	1,655	1,622	1,515	1,513

⁵ <https://www.education-ni.gov.uk/sites/default/files/publications/education/DP%20523%20-%20Drumlins%20IPS%20-%20Submission.pdf>

Derry City & Strabane	2,096	2,061	2,001	1,902	1,896	1,863
Fermanagh & Omagh	1,511	1,413	1,513	1,500	1,494	1,417
Lisburn & Castlereagh	1,752	1,716	1,745	1,723	1,791	1,721
Mid & East Antrim	1,591	1,509	1,571	1,515	1,449	1,464
Mid Ulster	2,135	2,174	2,147	2,126	2,052	2,090
Newry, Mourne & Down	2,547	2,509	2,499	2,408	2,360	2,244
Ards & North Down	1,743	1,754	1,650	1,557	1,532	1,531
Northern Ireland	24,394	24,215	24,076	23,075	22,829	22,447

Source NISRA/NINIS

Table 4 shows that the births in Fermanagh and Omagh have remained steady at an average of 1475 for the last six years, whilst births in several of the Local District Councils in Northern Ireland and Northern Ireland as a whole declined. Thus, there is **no significant decline** in the cohort in this LGD. (See extract of DE's letter in Case for Change).

Table 5 – (Update of Table 15 of Case for Change) Birth rates in the feeder wards for Enniskillen IPS

Ward	2014 All births	2015 All Births	2016 All Births	2017 All Births	2018 All Births	2019* All Births
Ballinamallard	30	25	28	24	26	28
Belcoo & Garrison	32	28	27	34	34	28
Boho	44	52	44	35	46	43
Brookeborough	25	34	44	36	35	25
Castlecoole	55	42	46	51	44	38
Derrygonnelly	28	33	36	38	40	27
Devenish	20	19	23	21	20	N/A
Erne	36	29	27	21	20	42
Fivemiletown	32	26	28	23	27	26
Florence Court/Kinawley	41	37	48	37	42	37
Irvinestown	30	31	34	39	40	55
Lisbellaw	34	35	32	33	37	33
Lisnarrick	17	10	21	15	22	29
Maguiresbridge	32	61	42	38	52	39
Portora	37	44	48	43	39	41
Rossorry	25	24	19	32	22	29
Tempo	37	32	41	42	39	35

Trillick	39	31	40	27	35	32
Total	594	593	628	589	620	587

Source NINIS

*Whilst the 2014-2018 figures are based on the older Wards the 2019 figures are based in the 2014 Wards.

Table 5 shows that the birth rate in the wards that act as feeders to Enniskillen IPS has not declined since 2014 and has remained steady at an average of 602 per year. Thus, there is no decline in the relevant age cohort size in the area surrounding Enniskillen IPS.

Table 6: Pre-school Provision in a Five Mile Radius of Enniskillen as from EA website with Admissions Figures from EA for 2018/19- 2021/22

School Name	School Mgt type	2018/19		2019/20		2020/21		2021/22	
		1 st prefs	Total Adm	1 st Prefs	Total Adm	1 st prefs	Total Adm	1 st prefs	Total Adm
Ballinmallard NU	Cont	28	28 (26)	27	26 (26)	19	23 (26)	32	26 (26)
Enniskillen IPS NU	GMI	47	26 (26)	65	26 (26)	49	26 (26)	52	30 (30)
Enniskillen NS FT	Cont	42	26 (26)	78	26 (26)	79	26 (26)	65	25 (26)
Enniskillen NS PT	Cont	41	52 (52)	24	51 (52)	13	52 (52)	12	51 (52)
Holy Trinity Pre School	Vol	9	15 (16)	16	16 (16)	Not in programme	-	10	8 (8)
Holy Trinity PS NU	Maint	52	52 (52)	46	51 (52)	60	52 (52)	57	52 (52)
Mullanaska Preschool	Vol	24	25 (25)	36	26 (26)	21	23 (26)	18	19 (23)
Squirrels Montessori Nursery	Private	34	31 (31)	26	29 (31)	27	29 (30)	36	30 (30)
Tiny Tots Cross Community Playgroup	Vol	22	24 (24)	28	26 (26)	17	19 (26)	24	24 (24)
Totals		299	279 (278)	346	277 (281)	285	250 (264)	306	265 (271)

Enniskillen IPS NU PT	26	4	5	4	7	0	0	0	0
Enniskillen NS FT	26	1	19	12	16	0	0	0	0
Enniskillen NS PT	52	34	15	7	10	25	3	6	20
Holy Trinity PS NU FT	52	1	5	13	9	0	7	0	0
Ballinmallard PS NU	26	9	4	5	8	7	2	6	0
Total		49	48	41	50	32	12	12	20

Source: EA

Underage issue

Table 7 shows the updated underage admissions in the catchment area. This year 2021-22 the underage admissions has increased in Enniskillen Nursery Unit after 2 years of very low underage admissions. This gives further evidence to NICIE and the Board of Governors' assertion that the underage admissions is not a trend but varies year to year. Thus, using the underage figures as a criterion for making a decision about the long-term future of the school and its sustainability would appear to be an unreliable metric see Justice Treacy's decision on Drumragh. The Board of Governors and NICIE would contend the issue of underage children is as a result of the failure by DE to implement fully the recommendations outlined in Learning to Learn - A Framework for Early Years Education and Learning October 2013. In addition, it would seem that a lack of advice to parents to apply for part time provision when they are applying for full time provision has resulted in the acceptance of a high number of 2 year olds. The cost of two-year olds in the statutory system has been cited as a reason for refusal to enable integrated schools to grow. It seems unfair to NICIE and the Board of Governors that these problems are being laid at the door of Enniskillen IPS and used to prevent its growth. The Governors and NICIE would contend this school should not be prevented from growing in response to demonstrated parental demand when the premise of underage children is not a reliable criterion. The problem being addressed is not of the integrated schools making but rather the failure of DE to implement its own

recommendations and a more localised failure to manage the application process effectively.

P1 Proxy Issue

As described in the Case for Change there is a disparity between the P1 proxy figures, the 1st preference and the total pre-school provision. NICIE would argue that it is clear that Enniskillen town is serving as a hub area for pre-school provision. As the maps in the Case for Change indicate Enniskillen IPS is serving a very large area of rural Co Fermanagh. As NICIE has pointed out before, EA PEG is using birth rate statistics and 1st preferences to plan for total pre-school provision, whereas DE are using P1 proxy figures to decide on development proposals. This leads to a situation where DE is using figures which are looking back at the P1 population to predict future need. In this area, the disparity between the three sets of figures (P1, 1st Preference and Pre-School provision) shows that the use of P1 figures, given the hub nature of Enniskillen is creating a barrier to the further growth of Enniskillen IPS. Using the P1 proxy figures, it appears that there is over-provision when in fact there is a closer match between 1st preferences and total pre-school figures than there is between P1 provision figures and total pre-school provision or 1st preferences.

Using the EA website, examination of the Primary 1 places within a five miles' radius of the more centrally located Enniskillen Model Primary School, shows that there are seven other schools in this area.

Across the 2 and 5 mile radius the number of P1 children is at its lowest for the last 6 years and this would appear to lead to a high level of provision, particularly in the 2 mile radius. However, the addition of the schools in the 2-5 mile radius lowers that over provision to 117.6%, and yet the number of pre-school places has not increased in step with P1 places at this radius.

The 2 mile and 5 mile radius tables both show that the underage children admitted fluctuates year to year and as previously noted, are again an unreliable and 'inflexible' projection measure to make decisions on future pre-school provision which the governors feel may impact on the long-term sustainability of the only integrated primary school in the whole of County Fermanagh.

Table 8 Level of Provision – 2 mile radius of Enniskillen IPS (Update to Table 18 in the Case for Change).

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision (excl Reception)	P1 places (EA stats)	Level of pre-school provision (% of P1 places)	1 st Prefs (incl u/a)	Level based on 1st prefs (%)		Underage admitted
								incl u/a	excl u/a	
2016/17	156	42	0	198	142	139.4	No stats			5
2017/18	156	44	0	200	137	146.0	225	88.8	No stats	7
2018/19	156	47	0	203	137	148.1	225 (40)	90.2	109.7	25
2019/20	156	47	0	203	126	161.1	255 (44)	79.6	96.2	10
2020/21	156	30	0	186	134	138.8	228 (36)	81.6	96.9	6
2021/22	156	38	0	194	102	190.2%	232 (42)	83.6	102.1	20

Table 9 (Update of Table 19 in Case for Change) Level of Provision – 5 mile radius of Enniskillen IPS

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision (excl Reception)	P1 places (EA stats)	Level of pre-school provision (% of P1 places)	1 st prefs (incl u/a)	Level based on 1st prefs %		Underage admitted
								incl u/a	excl u/a	
2016/17	182	90	9	272	277	98.2	No stats			9
2017/18	182	96	8	278	287	96.9	301	92.3	No stats	13
2018/19	182	96	0	278	287	96.8	299 (49)	92.9	111.2	32
2019/20	182	99	18	281	272	103.3	346 (48)	81.2	94.2	12
2020/21	182	82	4	264	290	91.0	285 (41)	92.6	108.2	12
2021/22	182	85	n/a	267	227	117.6	306 (50)	87.3	104.3	20

Reasons to consider approval

The school wants to match the provision in the nursery unit with the two-form entry in the primary school and deal with a very high level of over-subscription in the nursery unit. Approval would support the growth of the two-form entry which started in 2014.

The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). NICIE would argue that transition and continuing professional development are both more easily achieved in a nursery unit setting than a voluntary playgroup.

This change would support the school to deliver improved outcomes for children and help a sustainable school to be sustainable into the future. The Chief Inspector's Report of 2012-2014 also highlighted at paragraph 133, "The lack of coherent area-based planning for pre-school provision across Northern Ireland can lead to settings being established with small numbers of funded children, thus limiting the children's opportunities to develop socially and emotionally. In addition, fluctuations in enrolments result in a small number of private and voluntary settings becoming unviable. To ensure the needs of all children are met effectively, the employing authorities and the Pre-school Education Advisory Group should consider how best to provide a high quality service that is sustainable and effective within an area-based model. To effect this improvement, there needs to be more coherent strategic planning and co-operation between government departments and across sectors to ensure that all children receive a good quality pre-school education."

One of the objectives of the recent draft of the Strategic Area Plan is to "sustain strong, successful and viable schools." The population in the Fermanagh and Omagh area within the age range of 0-15 years is projected to increase by 0.3% by 2024. However, as the Case for Change states Fermanagh has a higher percentage of people living in it from outside NI than the average for NI. The Providing Pathways plan also makes reference to dealing with the increase through encouraging and facilitating sustainable integrated schools by developing proposals to address the growth. Approving this proposal would assist the DE in fulfilling its duty under Article 64 of the Education Reform Order (NI) 1989, 'to encourage and facilitate the growth of integrated education.'

Additional reasons to approve this proposal include:

- It provides value for money for the statutory sector as no capital is required because a permanent building has already been sourced through charitable means and has been providing a nursery provision in the morning for some years. This proposal simply requires funding to allow the extension of staff working hours.
- It would allow for more efficient and effective ways of funding and administering the early years provision; which currently consists of a part-time morning nursery unit session and a charitably funded afternoon playgroup session.
- The Playgroup Leader is the school's Nursery Teacher, therefore there will be no staffing issues to resolve.
- Approval for this proposal would allow the school to run more effectively under one funding, management, registering and inspection stream. NICIE and Enniskillen IPS are very mindful of the equal value equated to pre-school provision in both nursery units and playgroups and the excellent provision available in both types of settings throughout Northern Ireland.
- From a management perspective NICIE supports Enniskillen IPS in making this request and asks that careful consideration is given to allow Enniskillen IPS to move to nursery status to reduce the bureaucratic burdens placed on the school. Operating a nursery unit and a playgroup requires different management structures and different inspection bodies for what is effectively identical provision. The school does not seek this change lightly. The principal has been fully involved in the playgroup and appreciates that the Department's position is that there is no difference between a well-run nursery and a well-run playgroup.
- It would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion.

- NICIE contends that if DE was to approve the conversion of the existing (non-PEAG funded) playgroup at Enniskillen IPS, it would represent replacement rather than displacement of an existing playgroup.
- The Nursery Unit is regularly over-subscribed as detailed in Table 3 above and in 2021-22 the school was awarded a temporary flexibility to enable it to take in an extra 4 children. This went only a short way to accommodate the 52 first preferences for 26 places, many of whom were siblings of children already in the school. Approval of the second session would assist in dealing with the fact that siblings are being turned away from the Nursery Unit, in fact 4 siblings are currently attending the IEF funded playgroup. This level of over subscription will mean that eldest children in families will not be able to access integrated pre-school provision in County Fermanagh.

From a parent and child point of view, approval would mean that:

Parents and children will enjoy a more seamless approach to education with an easier transition to primary education.

Children with special needs and their families would benefit from simpler and timelier access to the systems for assessment and support. Children in playgroups still do not have access to assessment for SEN, except through medical referrals. The recent opening of the Learning Unit would be supportive of early identification and help for any child with special needs.

Impact on other settings

This Development Proposal has been notified in the current Area Action plan.

A substantial majority of the pre-school cohort of children attending Enniskillen IPS Nursery Unit transfer on to the primary school. The remainder of the P1 children come from a variety of other settings including five or six each year from the other two statutory settings. It should be noted that, each year several children attend Enniskillen IPS who do not have pre-school experience. The school has advised that three of this year's P1 intake did not have pre-school experience. However the numbers not receiving pre-school are dropping, perhaps due to Enniskillen IPS meeting an unmet and unreported demand by opening the playgroup to deal with their over-subscription.

As can be seen in Table 6 above (figures provided by EA) the statutory provision has been generally over-subscribed over the 4 year period, with the exception of the part-time session in Enniskillen Nursery School. Enniskillen IPS has been consistently over-subscribed for the past 4 years. With the exception of Holy Trinity pre school, which was not in the programme in 2021, the three other voluntary/private playgroups are well subscribed. These figures do not take account of the fact that Enniskillen IPS has been operating a non-funded pre-school provision, which provides places for 16 children.

Impact on other Integrated provision

Other Integrated settings (Omagh, Oakgrove and Windmill IPSs) are too far away to be impacted.

However as the Case for Change document and the previous Ministerial submission have indicated in the postcode maps for children, Enniskillen IPS and NU draw children from a much wider area than the cluster of wards in Enniskillen town itself. This may be owing to a combination of factors; transport routes, parents travelling to work in Enniskillen, access to childcare and after-schools facilities in addition to parents' desire for an integrated place in the primary school.

Table 10: Religious Balance in pre-school settings in the area 2020/21

Funded Providers	No. of Protestants	% Protestants	No. of Catholics	% Catholics	No. of Others	% Others	Total
Ballinamallard PS NU	19	73.08%	*	*	*	*	26
Enniskillen Nursery School	40	50.63%	24	30.38%	15	18.99%	79
Enniskillen Integrated Primary School NU	10	37%	10	37%	7	25.9%	27
Holy Trinity Primary School NU	*	*	46	88.46%	#	#	52

Squirrels Montessori	0	0	14	46.7%	16	53.3%	30
Holy Trinity Pre-School	-	-	-	-	-	-	0
Tiny Tots	7	43.8%	#	#	*	*	16
Mullanaskea	0	0%	#	#	*	*	23

Source: DE Figures

* less than 5 cases

figure suppressed under rules of disclosure

NICIE has previously raised the matter of the assertion that Pre-school provision is non-sectoral with senior officials in the Department of Education in a paper in July 2017 and in an earlier section of this document. Table 10, above, shows that whilst there is definite mixing in the Integrated Nursery Unit and some in the standalone Enniskillen Nursery School, the enrolment in the Holy Trinity Nursery Unit is predominately from the Catholic tradition. It is difficult then to state that pre-school is non-sectoral.

It should be noted that the balance for the 2020-21 year in Enniskillen IPS nursery unit is 37% Catholic, 37% Protestant and 25.9% Other, very close to the 40,40, 20 aspires to NICIE's Statement of Principles.

Religious Balance and Equality of Access

On Census Day 27th March 2011, in **Fermanagh and Omagh** Local Government District (2014), considering the resident population: **64.23%** belong to or were brought up in the Catholic religion and **33.08%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion; (Source NISRA)

Enniskillen IPS is truly a shared space, which the draft Programme for Government has highlighted as being important for the future of Northern Ireland.

Concluding Remarks

NICIE would urge the Minister to approve this proposal. NICIE believes that supporting this expansion of pre-school provision would be a low cost and positive step to support a currently sustainable Integrated school and would remove an obstacle to supporting its possible further growth in years to come. Justice Treacy [2014] NIQB 69 referred to the Article 64 duty “to encourage and facilitate integrated education in Northern Ireland and its practical consequences and legislative significance which includes taking positive steps or removing obstacles which inhibit the statutory objective.”

It would appear that Enniskillen IPS has in recent years fulfilled a previously unmet demand. This is evidenced, by the high level of oversubscription at Enniskillen IPS (Nursery Unit) as well as other settings in the area and the demand for places in an Integrated pre-school playgroup setting by parents. NICIE would argue that displacement is not an issue for this proposal owing to Enniskillen IPS’s playgroup already accommodating up to 16 children in recent years.

The current structure of a two form entry primary school supported only by a single form entry nursery unit is destabilising as it leads to parental disappointment. It restricts the number of families gaining access to Integrated education in Fermanagh, often siblings are not gaining a place in the Nursery unit.

NICIE would urge the Minister to support this proposal as it represents a low cost opportunity to support a sustainable school into the future. It makes good use of the existing building by providing an afternoon session. The school building programme which was announced as part of the Fresh Start Agreement (23rd March 2016) is progressing. It would also help those who wish to choose an Integrated option and address any shortfall for pre-school places in the area as well as providing additional places for those who are arriving at school without pre-school experience.

The school draws from wards which have been affected by the conflict and research is beginning to expose the trans-generational aspects of the troubles. ‘Towards a Better Future: the Trans-generational Impact of the Troubles on Mental Health.’ (Prepared for the Commission for Victims and Survivors by Ulster University, March 2015). Indeed, the Victims and Survivors Forum members’ “consideration of the

conflict's trans-generational legacy recognised the imperative of examining the role of early years education in supporting parents and addressing sectarianism.”

The recent paper “A Fair Start” highlighted the importance of investment in the early years to address under achievement for all section 75 groups. This proposal therefore represents a positive and low cost move forward for the whole school community.

Finally, NICIE urges the Department to support this proposal in recognition of the Department’s duty within the Education Reform Order (1989) to “encourage and facilitate integrated education”. This duty was amplified in the letters from DE of 31st October 2017 and 15th January 2018 in relation to “Pre-School Education and the Statutory Duty to Encourage and Facilitate the Growth of Integrated and Irish-Medium Education.” Whilst the 31st October letter gave helpful clarification on ‘demonstrated parental demand’ which this proposal shows, the 15th January letter was clear in referring to the ‘standalone concept’ of integrated education and there is no alternative integrated provision in the area.

CONTROLLED SCHOOL SUPPORT COUNCIL



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26 November 2021

Dear sir/madam

Re: Development proposal 664 Enniskillen Integrated Primary School

The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. CSSC supports controlled schools, which are open to all faiths and none, in providing high quality education for children and young people to enable them to learn, develop and grow together, within the ethos of non-denominational Christian values and principles.

The diversity of the controlled sector is evident in the age range of pupils it serves, 3 to 19, as well as in the types and locations of the schools which it represents. It celebrates the inclusion of Nursery, Primary, Special, and Post-Primary schools within its wide reaching community, which welcomes all young people, whoever they are and from wherever they come. The controlled sector is the largest education sector in Northern Ireland accounting for 49% of all schools and catering for over 146,000 pupils.

CSSC notes the publication of Development Proposal 664, on behalf of the Board of Governors of Enniskillen Integrated Primary School, to expand pre-school provision at the school through the establishment of a single afternoon nursery session to provide 26 part-time places with effect from 1 September 2022, or as soon as possible thereafter.

CSSC has considered the case for change, together with decisions relating to previous development proposals, published in 2016 and 2018, to establish a 26 place afternoon nursery session at Enniskillen Integrated Primary School. This analysis, together with consultation with neighbouring controlled schools, confirms the proposal will impact negatively on existing good quality pre-school provision. CSSC welcomes the opportunity to make comment in this context.

On the basis that there was sufficient good quality pre-school provision available in Enniskillen to meet assessed need, CSSC welcomed previous decisions to not approve Development Proposals 488 and 543, in May 2017 and in April 2019 respectively. The publication of Development Proposal 664 is a significant concern in that CSSC is unsure as to how this proposal has been allowed to progress for a third time. Taking into account the statement made by the Minister of Education to the Area Planning Steering Group on 21 October 2021, CSSC raised concerns through the pre-publication consultation highlighting

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conditions outlined by the Minister for the extension to the Action Plan 2019-2021 to 31 August 2022, which CSSC believes apply to this proposal:

- "priority should be given to proposals that are aligned to the Minister's existing priorities regarding composite classes, small sixth forms and unsustainable, small schools;
- with so many workstreams not yet substantially advanced, no new proposals should be brought forward during the extension period unless they are demonstrably essential to respond to the needs of children and young people of compulsory school age;
- where previously submitted proposals are brought forward again, the Area planning teams will expect to see clear and compelling NEW evidence that supports their publication;"

CSSC believes this proposal is out with the Minister's stated priorities, does not respond to the needs of children and young people of compulsory school age and following detailed analysis of the case for change it is the view of CSSC that compelling new evidence has not been provided. The reasons provided by the Department of Education to not approve previous proposals to expand this nursery provision, as recently as 2019, remain valid. This raises concerns, not only in relation to the efficient use of resources in the administration associated with repeated development proposals, but also in respect of the significant anxiety this proposal has brought for neighbouring schools impacting on good community relations and collaboration between schools at local level.

The "new evidence" to support the development proposal is summarised within the case for change and included here for ease of reference:

- "There is no current decline in the cohort population in the area surrounding Enniskillen IPS
- The use of underage children as a criterion is unreliable as it fluctuates year to year and does not therefore constitute a trend
- The use of P1 as a proxy leads to inflexibility as a projection measure and is inconsistent with the measures used by the Education Authority (first preferences and pre-school provision).
- Since the use of underage children and the P1 proxy measures could be viewed as unreliable and inflexible, then the inference of displacement arising from the assessment of overprovision, using these measures, is flawed."

CSSC recognises that it is for the Department of Education to determine what constitutes compelling new evidence but would offer the following observations in respect of each of the above bullet points.

The case for change presents 2019 population estimates for Fermanagh and Omagh, presented in broad age bands, which indicates an estimated 2.4% increase in the 0-15 age band over the decade ending mid 2018. This data relates not only to a wide geographical



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area but also to a broad age range, both of which are beyond the scope of this proposal. The case for change also states that births in Fermanagh and Omagh have remained steady for the last four years. The births for 18 Wards, identified as feeder Wards for Enniskillen Integrated Primary School, are also presented with a statement indicating that births have not declined since 2014.

It is interesting to note that in the 2019/20 nursery intake children come from 12 Wards, with only one child attending from seven of these. An analysis of the five Wards with more than one child in attendance indicates a decline of 26 births in the four year period which is concerning in the context of a proposal to increase nursery provision by an additional 26 places.

When planning for future provision it is also critical to consider population projections. The case for change however, fails to provide evidence or comment in this regard with the data presented for births relating only to pre-school admissions between 2018/19 and 2022/23. CSSC has considered the 2018 based population projections, using the Fermanagh Local Government District as a more relevant administrative geographical area rather than the Fermanagh and Omagh District Council. This illustrates that from 2021, a 12.4% decline is predicted in the 0-4 age band, over a ten year period.

The second piece of "compelling new evidence" presented is that the use of underage children as a criterion is unreliable as it fluctuates year to year and does not therefore constitute a trend. It is noted that the information presented within the case for change in respect of underage admissions relates to providers within a two mile radius and not a five mile radius as stated and that the number of underage admissions for providers within a five mile radius is greater.

The rationale for considering underage children is set very clearly in context by the Department of Education, as outlined in the 2019 submission in respect of Development Proposal 543. "In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of resources available to it. In light of this, it aims to maximise available pre-school places for target age children, avoiding overprovision and the resulting enrolment of children younger than three years and two months (underage children) in statutory settings."

As referenced above, the case for change highlights that births in Fermanagh and Omagh have remained relatively stable over a four year period. Whilst this is true there have been fluctuations over this period which is reflected in the number of penultimate aged children enrolled in statutory settings. Analysis of births in the Fermanagh Local Government District

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indicates there were 99 fewer births in 2018 compared to 2015. It also indicates a fluctuating pattern rather than a steady downward trend. Over the four year period from 2018-19 to 2021-22, the number of penultimate aged children in Enniskillen Nursery School has fluctuated between 3 and 26 giving an average trend of 14.5. What is more relevant than the fluctuations is that the number is always greater than zero, indicating that there is overprovision.

Population projections referred to above indicate that whilst enrolment of penultimate children may fluctuate from year to year, with a projected decline in the 0-4 age band, in all likelihood the numbers of penultimate children will increase. CSSC notes concerns raised by the Pre-school Education Group (PEG) regarding the impact of this additional provision, the potential for increased uptake of younger children into statutory nursery settings and the consequent increased costs on public funds (1 April 2021).

The 2016/18 Chief Inspector's Report⁴ commented on the impact of the continuous growth of nursery units across Northern Ireland and the pressures this creates with the increased number of underage children in statutory settings which arise from overprovision. "Where there is a larger number of underage children in a class, including those with additional needs, the demands on the practitioner to provide a quality pre-school programme is restricted and, as a result, the children do not make as sure a start as expected. The continued growth in the number of nursery units poses a challenge for pre-school area-based planning across Northern Ireland." CSSC would contend that the significant numbers of underage children presenting in statutory settings is a reliable indicator that pre-school provision in Enniskillen is exceeding demand. Additional statutory provision can only serve to compound this issue and has the potential to impact on the quality of pre-school education, as highlighted by the Education and Training Inspectorate (ETI).

The third piece of "compelling new evidence" presented is that the use of P1 as a proxy leads to inflexibility as a projection measure and is inconsistent with the measures used by the Education Authority (first preferences and available pre-school provision). CSSC would accept, if used in isolation, P1 proxy could be seen as an inflexible measure. This, however is not the case.

The Department of Education uses current levels of pre-school provision, within both a two-mile and five-mile radius, as **an indicator** of current capacity to meet the need for pre-school provision. This is considered **alongside other factors** such as population projections, to determine the likely future need for additional pre-school provision in an area. It is interesting to note that, in its 2019 analysis, the Department considered numbers of pre-school education places measured against Year 1 enrolments over a three year period at both the two and five miles radius, and without including the proposed increase, the level of provision was already higher than the 95% planning figure, significantly so within the two mile radius.

⁴ https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/cin-2016-2018_1.pdf



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Rather than seeing the Education Authority's use of first preferences compared to available pre-school provision as an issue, CSSC considers it helpful as another indicator which will either confirm conclusions or illuminate any anomaly in respect of the Department's analysis. The key factor here is whether each respective organisation applies the methodology consistently across all proposals. Where P1 proxy and first preferences, compared to available pre-school provision, both indicate that provision is in excess of demand it is compelling evidence that additional provision is not required. CSSC notes that the EA is, "concerned that the implementation of this proposal will result in increased costs for the existing provision which is already in excess of demand."

The fourth and final piece of "compelling new evidence" relates to the issue of displacement. The risk of undermining existing good quality pre-school provision in the area was emphasised in both the 2019 and 2017 decisions. The case for change asserts that "since the use of underage children and the P1 proxy measures could be viewed as unreliable and inflexible, then the inference of displacement arising from the assessment of overprovision, using these measures, is flawed." CSSC has provided evidence to demonstrate that the use of underage children and the P1 proxy measures, together with an analysis of birth rates and population projections are not only reliable and flexible measures, but are sound indicators of requirements and the potential impact of additional provision on other settings.

CSSC shares the concerns expressed by EA in this regard, "Any additional pre-school provision within the area will detrimentally impact on current non-denominational pre-school providers both statutory and non-statutory". In respect of the 2019 decision, CSSC welcomed the Department of Education's affirmation, "it is 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."

CSSC recognises the role of PEG in assessing need in respect of pre-school education provision and that strong concerns were expressed by PEG in relation to the potential displacement of existing funded pre-school provision in the area if this proposal were to be approved. The 2016-18 Chief Inspector's Report² also highlighted this issue, "There is an increase in the displacement of good and outstanding voluntary sector provision as a result of the increase in the number of nursery unit development proposals being approved. There remains a need to improve the connections between all early years' providers." It is important to note the 2019 Department of Education submission highlighted that a non-

² https://www.esni.gov.uk/sites/esni.gov.uk/files/publications/cir-2016-2018_1.pdf

statutory pre-school education provider left the Pre-school Education Programme (PSEP) in June 2018 as it received fewer than the minimum number of pre-school applications in the 2018/19 admissions process due to the high level of existing provision in the area. The Department indicated that with additional provision it is possible that other providers in the area could be similarly affected. This has significant implications in respect of birth rate fluctuations discussed above, as non-statutory settings provide the flexibility which is required in the system to enable PEG to manage year on year variations in numbers of applications. The value of retaining flexibility in meeting the pre-school education needs of children and their parents is recognised within the guiding principles for PEG.

In setting the policy context, the Department confirmed in the 2019 submission that all funded pre-school education settings, regardless of location and management type, are considered 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, as young children are nurtured in understanding, "that we see the world in many different ways depending on our cultural, social and religious viewpoints".

In 2014 Justice Treacy provided a definition in respect of an integrated school, "...an integrated school strives to achieve an equal balance in relation to worship, celebration and exposure to both faiths. This is reflected in its constitution and the board must strive in its ethos to achieve this." It is important to note that this definition was given in the context of compulsory education where a daily act of worship is mandated in legislation, religious instruction is a compulsory element of the curriculum and Catholic Maintained schools and some types of controlled schools will have trustee or transferor representatives respectively, on the Board of Governors. Since pre-school education does not have a mandated daily act of worship and religious education does not form part of the pre-school curriculum it is questionable if this definition can be applied to pre-school education. Another important distinction is that Boards of Governors of Nursery Schools and Management Committees of non-statutory settings do not have transferor or trustee representatives.

CSSC acknowledges 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. Parental expectations and institutional aspirations however, have to be managed in the context of efficient use of resources. The Case for Change focuses on parental preference for pre-school places within an integrated school, rather than unmet demand for pre-school education generally. CSSC contends that pre-school provision in an integrated school should not be treated more favourably than any other as to do so would be to undermine the policy foundation that this non-statutory phase of education is not defined according to sectors/management types. CSSC endorses the non-sectoral nature of pre-school education and notes the high quality provision, verified by ETI, available at all types of pre-school settings in the area, both statutory and non-statutory.

Enniskillen Nursery School has a long history of having a diverse intake as demonstrated in Table 1. The inclusive ethos of the school celebrates the diversity of its pupils, embracing

their religious, cultural and social backgrounds. This contributes to making Enniskillen Nursery School naturally integrated and provides evidence that within the local community it is considered accessible to children from all backgrounds. Controlled nursery schools provide some of the best examples of inclusive practice within the pre-school sector. The concept of a "GMI pre-school experience", as referred to in the case for change, is contradictory to the policy of non-sectoral pre-school provision, assumes that integration only happens in a formally integrated school and is a step backwards in the context of the Executive's commitment to a single education system.

Table 1: Religious Breakdown of pupils attending Enniskillen Nursery School³

Academic Year	Protestant	Percentage	Catholic	Percentage	Other	Percentage
2020/21	40	51%	24	30%	15	19%
2019/20	36	45%	23	29%	21	26%
2018/19	28	38%	28	38%	18	24%
2017/18	38	47.5%	21	26.25%	21	26.25%
2016/17	42	52.5%	17	21.25%	21	26.25%

In the 2017 submission CSSC noted ETIs endorsement of the non-sectoral nature of pre-school education, as articulated in the context of concerns raised in relation to the wide catchment area of Enniskillen Integrated Primary School, "the ETI does not consider it appropriate that young children travel long distances to a specific provision given that all pre-school provision is cross community". This proposal to increase provision has the potential to further extend the already wide catchment area for the nursery unit. ETI concluded that applications from outside the immediate locality would require an excessively lengthy journey time for children of nursery age and may have detrimental impact on their learning experience. Whilst the case for change asserts there are no additional transport costs, given that children generally transfer into a primary school from its nursery unit this will have recurring financial implications for transport costs for the next seven years of the child's education.

The case for change states that while it is true there are arrangements in place for smooth transition between pre-school providers and Year 1 this does not compare with the transition arrangements that Enniskillen Integrated Primary School have in place. CSSC is unsure of the evidence base for this statement and contends that all pre-school settings and primary schools in the Enniskillen area have effective transition programmes to ensure

³ Source: <https://www.education-ni.gov.uk/services/schools-plus>

children experience a smooth transition from pre-school to primary school, regardless of the setting from which they are transferring or the primary school within which they enrol.

Whilst CSSC acknowledges that individual development proposals must be considered on their own merit, it is important to consider the wider context. This response has highlighted concerns in respect of the impact of the repeated publication of this particular proposal but it is of significant concern to CSSC that this is not unique. Since the establishment of CSSC in 2016, Council has considered 17 proposals to establish or expand pre-school provision in formally integrated schools (three of these are currently at pre-publication stage of consultation). 13 of these relate to proposals in respect of six schools which were not approved when first published.

The Education Authority is responsible for ensuring there is sufficient provision in local areas to provide a funded pre-school education place for every child in their immediate pre-school year whose parents want it. The role of the EA PEG, as defined within the Constitution, is to assess annually projected need and demand, together with the level of pre-school education provision in local areas, in order to ensure that the planning and allocation of funded pre-school education places meets the overall needs of each area.

The PEG is required to notify the EA Board of its agreed position on the overall number of funded non-statutory pre-school education places required, taking into account the need to allocate places on a consistent basis and to ensure optimum use of existing provision in line with DE policy.

Significant changes to statutory provision fall outside the remit of PEG and are progressed through the development proposal process with the role of PEG restricted to providing comments on how development proposals fit with the overall need after the process has been initiated. As planning for pre-school education falls outside the Area Planning framework for primary, post-primary and special schools there is no collaborative framework or mechanism to support a strategic approach to future planning of statutory pre-school provision resulting in a fragmented individual school or sector approach.

CSSC would welcome the opportunity to work in collaboration with other stakeholders to contribute to a planning approach where children are at the heart of decisions. This would be consistent with the Minister of Education's expectations in respect of planning across the education sector, as articulated on 9 August 2021, "Setting the Priorities for the Next Regional Area Plan for the Education Sector in Northern Ireland". CSSC contends that the Minister's assertion, "it is unacceptable that the interests of individual school or sectors should prevail in planning considerations", should apply to planning for pre-school education. CSSC believes that this can be achieved without compromising the duty to encourage and facilitate Integrated and Irish Medium Education. A more strategic collaborative approach would also support the prioritisation of the Minister's priorities in the area planning process.

CSSC strongly objects to the proposal to establish an afternoon nursery session in Enniskillen Integrated Primary School and has demonstrated in its response that the evidence does not support the need for additional pre-school provision in the Enniskillen area. Council



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recognises the Department's duty to encourage and facilitate the development of integrated education and has highlighted that pre-school education is non-denominational, is not defined by sectors and all funded settings are intended to be accessible to children from all backgrounds. Council is also mindful of the Department's duty under Article 44 of the Education and Libraries (NI) 1986 Order and under Managing Public Money to ensure effective and efficient use of public funds, and considers that this proposal does not represent an efficient use of limited resources. In a context where the Department of Education has placed on record the requirement for an extra £350 million in 2022/23 to meet inescapable pressures, CSSC would reiterate there is no justification for approving a proposal to increase pre-school provision where there is already overprovision in the area.

Summary of evidential base underpinning CSSC's objection to this proposal:

- The reasons provided by the Department of Education to not approve previous proposals for the establishment of an additional 26 place afternoon nursery session in Enniskillen Integrated Primary School remain valid.
- The proposal is out with the Minister's stated priorities and does not respond to the needs of children of compulsory school age.
- New and compelling evidence has not been presented for the establishment to of an additional 26 place afternoon nursery session in Enniskillen Integrated Primary School.
- There is overprovision of pre-school education places in the area evidenced by the number of penultimate age children in statutory settings.
- Population projections indicate a declining 0-4 year old population over the 10 year period 2021-2031.
- Existing pre-school provision is diverse and inclusive and accessible to the community, as evidenced by the religious breakdown of children attending Enniskillen Nursery School and voluntary settings.

Yours faithfully

Mark Baker
Chief Executive

Controlled Schools' Support Council www.csscni.org.uk
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NOTE OF THE MEETING WITH REPRESENTATIVES OF JONES MEMORIAL PS



MINISTER'S PRE-BRIEF AND MEETING NOTE

PRE-BRIEF

MEETING

DATE AND TIME OF MEETING:		Wednesday 15 December 2021 12.30 pm	
TITLE/ORGANISATION: [Include INV number where possible and ensure title on re-brief and meeting notes are the same]		INV-0464-2021 Meeting with Representatives of Jones Memorial PS regarding Development Proposal (DP) 664 for Enniskillen Integrated Primary School (IPS)	
VENUE: Jones Memorial PS		<input type="checkbox"/> PB	<input type="checkbox"/> Rathgael
		<input type="checkbox"/> OTHER:	
LIST OF ATTENDEES: <i>(As follows)</i>			
<input checked="" type="checkbox"/> Minister	<input checked="" type="checkbox"/> SpAd:	<input type="checkbox"/> Minister PS	<input checked="" type="checkbox"/> Minister APS
OFFICIALS:	Eamonn Broderick, Area Planning South West Region Clare Baxter, Principal Information Officer Elaine Armstrong, Area Planning South West Region		
OTHERS: [include PDF copies of any presentations delivered]	Mrs Deborah Erskine (DE) MLA for Fermanagh and South Tyrone Rosemary Barton, MLA for Fermanagh and South Tyrone Mrs Sandra Isherwood (SI) – Principal Ms Anne Beattie (AB) – Chair of the Board of Governors (BoG) Mrs Roberta Bailie (RB) – Vice Principal Mrs Helen Graham (HG) – Senior Management Team		

KEY POINTS DISCUSSED:

(Verbatim record)

The Minister was given a tour of the school and invited to walk the Narnia Trail.

SI welcomed everyone to the school. AB said that it was a pleasure to show off the work of the children and staff. The staff work hard to provide the best for the children. They were conscious of the school's position in the community at the start but have brought the community along by opening the school's doors and their hearts. The school has a mixed religious balance and is naturally integrated with 80 pupils from a Protestant background, 55 from a Catholic background and 13 others which is reflective of the area. First communion and confirmation classes are provided.

There is a fear that further provision will have an impact and over provide where there is already capacity and we must take account of the best use of public funds. It is important that this end of Enniskillen [i.e. Jones Memorial] has provision for parents with new houses being built and a bypass in planning. The school is a rural/ urban school. The school leads in Shared Education and works very well with neighbouring schools.

HG stated that transport is an issue in terms of the proposal. Although pre-school pupils are not entitled to home to school transport these children will go on to transfer to the primary school, so there will be costs going forward. If the proposal is approved, the Department will have to consult with the Department for Infrastructure due to traffic congestion. There are already applications and plans for a shopping complex immediately opposite Enniskillen IPS' entrance.

There are a number of providers who will be negatively impacted and the NISRA projections show a 14% reduction in the 0-4 age group from 2016 to 2041. There has also been a steady decline in birth rates in the past four years. The Board of Governors (BoG) feels that this will result in a surplus of places putting pressure on the existing providers and create competition which would roll on and threaten successful programmes.

RB stated that as an infant teacher for over 25 years, she had been involved with CCEA Early Years and the drawing up of the transition document from pre-school to P1. The proposal states that reception should not be taken into account but based on the Learning to Learn 2013 document, this is irrelevant as this legislation is not up to date and was never made law. What the proposal suggests is at odds with the Department's practice not to displace good quality pre-school provision already in existence with pre-school provision in another setting. The pupils enrolled in reception are siblings or from social housing. The school [Jones Memorial] provides support for families and are deeply hurt by the suggestion that what is offered is not on par. Reception is a smooth transition into P1. Pupils from reception who transition to other schools are provided with a carefully constructed transition package. The school works well through the Shared Education project and is doing a pretty good job which should be recognised.

Just like Enniskillen IPS, the reception pupils are in the same school building, next door to P1. The pupils have the experience of 'big' school right from the start.

Jones Memorial is forward thinking and has produced bi-lingual booklets and policies and for the first time has had Arabic books from Enniskillen library. The BoG is pleased to say that all parents and children are part of the school community. Reception pupils attend special events making the transition to primary school seamless. The BoG notes the strong concerns expressed by the PSEP in relation to displacement, the potential uptake of younger children into statutory nursery settings and the increased cost to public funds, as well as the impact on well-established cross-community provision across Fermanagh in respect of the Shared education duty.

The school embraces the backgrounds of all pupils and is naturally integrated. The reception is open to all backgrounds and has places to provide an excellent start to education.

SI wished to point out the travelling arrangements in place – Jones Memorial does not have the same facilities as others but is affected by what is the closest school. Enniskillen IPS is not disadvantaged this way as an integrated school. Most schools have an integrated part to their enrolment. Enniskillen IPS is taking pupils not only from the local area but across Fermanagh. DP 664 indicates 85% of pupils from outside the immediate locality. Nursery children should not have to travel long distances from Newtownbutler and Derrylin. These children will most likely enter Enniskillen IPS and the Department will then fund the transport costs. As a Controlled school, Jones Memorial is affected by the nearest school 0.12 miles away.

In relation to the previous proposal DP 488, the ETI stated that although it was the only integrated school, young children should not travel long distances. As per the SSP and accessibility, is the distance and time reasonable?

Community is key – Jones Memorial is a Sustrans school and an ECO school. The school embraces children walking and cycling to school – Enniskillen IPS would be 30 minutes in the car. There are walking buses to the local shops and working with the community which is socially deprived. This is how friendships are developed through taking part in community events. She thanked the Minister and officials for coming along.

The Minister wished to put on record her thanks for today's visit and the huge effort the school had gone to and for the Narnia trail. She advised that the note of today's meeting would be shared to ensure factual accuracy.

SI stated that she hoped that the Minister would take away the experience of the school and that she would reflect on the points made.

RB, MLA expressed her thanks to the school and the BoG for the visit.

ISSUES AGREED:

ACTION POINTS / OFFICIAL RESPONSIBLE:

Notes of meeting to be circulated. (Elaine Armstrong)

NOTE WRITTEN BY: Elaine Armstrong	DATE: 17 December 2021

Signed and dated by Private Secretary:_____.

Ministers clearance : 12/01/22_____.

ETI Development Proposal Commentary Paper

DP 664

Date of last ETI report: 27 June 2017

Web link:

<https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/sustaining-improvement-inspection-enniskillen-integrated-primary-school-county-fermanagh-206-6549.pdf>

Date⁶:

1. Update on relevant/contextual information since the last published inspection report.

The enrolment in Enniskillen Integrated Primary School has increased since the school's published Sustaining Inspection Report in 2017 from 338 to 418 children in 2021. (Source NICIE and DE numbers include 26 nursery places.)

A new carpark has been completed at the Nursery Unit to add to the safety of the pre-school daily entry/collection routines.

The number of first preference, pre-school applications to Enniskillen Integrated Primary school for 26 places has increased from :

37 in September 2013 to

51 in September 2021 (Source School/EA).

2. Knowledge of **any contextual information on the quality of education** in the wider local area.

From the most recent ETI reports, the individual overall effectiveness of the alternative Pre-school Provision in the area is listed:

Ballinamallard Primary School and Nursery Unit Follow-Up Inspection October 2017

Ballinamallard Primary School and Nursery Unit has a high level of capacity for sustained improvement in the interest of all the learners.

Enniskillen Nursery School Inspection December 2014

In the areas inspected, the quality of education provided by this nursery school is outstanding; the quality of pastoral care is also outstanding. The nursery school has demonstrated its capacity for sustained self-improvement.

Holy Trinity Primary School and Nursery Unit, Enniskillen, County Fermanagh Report of an Inspection in April 2016

⁶ This commentary paper is based on the information and evidence available to ETI on this date. Please check the ETI website www.etini.gov.uk for any new inspection reports that may have published after this date.

Holy Trinity Primary and Nursery School has a high level of capacity for sustained improvement in the interests of all the learners. The ETI will monitor how the school sustains improvement.

Lisbellaw Primary School and Nursery Unit Sustaining Improvement Report November 2018

Lisbellaw Primary School and Nursery Unit continues to demonstrate a high level of capacity for sustained improvement in the interest of all the learners.

Mullanaska Pre-School, Enniskillen, Voluntary pre-school Report of an Inspection in May 2018

Mullanaska Pre-School has a high level of capacity for sustained improvement in the interest of all the learners.

Tiny Tots Cross-Community Playgroup, Mullymesker, Enniskillen Voluntary Playgroup Report of an inspection in March 2017

Tiny Tots Cross Community Playgroup has a high level of capacity for sustained improvement in the interest of all the learners.

Squirrels Montessori Nursery, Enniskillen, Co Fermanagh Report of an Inspection in May 2015

In the areas inspected, the quality of education provided by this playgroup is outstanding; the quality of pastoral care is also outstanding. The playgroup is meeting very effectively the educational and pastoral needs of the children; and has demonstrated its capacity for sustained self-improvement

3. Potential benefits/concerns associated with the claims of **educational** benefits for pupils made in the Case for Change.

The approval of a single pre-school afternoon session to provide for 26 part-time places would potentially benefit a greater number of children from a continuous educational programme from pre-school into primary in the ethos of integrated education.

4. Any concerns about the **implementation date or phasing of implementation** should this be applicable (i.e. curricular, EF, accommodation, LSCs, etc.).

Although Enniskillen Integrated Primary School is the only integrated provision in County Fermanagh, ETI does not consider it appropriate that young children travel long distances to pre-school provision given that all such provision is cross- community.

5. The **SSP Criteria** indicators requiring ETI input (if known and/or for which information is available).

Sustainable Schools Criterion	Indicator	Meets criterion		
		Yes	No (reason(s))	Information not available
Quality Educational Experience	1.1 Attainment levels of pupils, Key Stage tests pending development of new indicators for Primary Schools, GCSE	x		

	results for Post-Primary Schools.			
	1.2 In primary, a single classroom contains no more than <u>two</u> year-groups in a composite class; for example, years 1 and 2.	x		
	1.3 A <u>minimum</u> of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers.	x		
	1.4 The ability of the school to cater for children with Special Educational Needs.	x		
	1.5 The ability at post-primary level to be able to provide suitable access to the entitlement framework including, where appropriate, linkages with other schools, the FE sector or other providers.			x
	1.6 The standards and the quality of learning and teaching at the school.	x		
	1.7 The range of curricular and extra-curricular activities available for children including career guidance, physical education, music, art, drama and science.	x		
	1.8 The quality of the <u>physical</u> environment for learning and teaching i.e. the condition, energy and water efficiency and suitability of the buildings.	x		
	1.9 The quality of, and arrangements for, pastoral care including the active promotion of the principles of social justice in all areas of the formal and informal curriculum.	x		
Strong Leadership and Management by Boards of	4.1 Governors' views on the school based on quantitative and qualitative evidence.	x		
	4.8 There is a school development plan in	x		

Governors and Principals	place and progress is being made to achieve the plan's aims and objectives.			
	4.9 Pupil behaviour, expulsions, suspensions and non-attendance as well as positive behaviours such as involvement in school management (e.g. buddying and mentoring schemes).	x		
Strong links with the Community	6.1 Degree and quality of parental involvement (schools will be asked to provide evidence on this).	x		
	6.3 Contribution of the school to the community (schools will be asked to provide evidence on this).	x		
	6.4 Presence of other features of provision, e.g. nursery or specialist unit.	x		

6. Summary of impact of the proposal

The Principal and Board of Governors of Enniskillen Integrated Primary School have demonstrated the capacity to provide effective leadership of the existing nursery unit and Primary school.

The addition of an afternoon nursery session for 26 children (part-time) within the existing nursery unit would enable a greater number of children to access integrated pre-school education in line with the NI Executive's policy to develop integrated education.

DE (Policy Team) Comments

A	Financial Monitoring Team
B	School Admissions Team (SAT)
C	Education Workforce Directorate
D	Inclusion and Wellbeing Directorate
E	Promoting Collaboration, Tackling Disadvantage Directorate
F	Transport And Food In Schools
G	Early Years Team

A. Financial Monitoring Team**206-6549 Enniskillen Integrated Primary**

As this school is a GMI, the surplus/deficit figures are not available.

The school received a total delegated budget of £1,386,423 in the 2022-23 financial year for **406.50¹** FTE pupils, which generates a per capita of £3,411.

The average for all primary schools is £3,421.

The total Free School Meals Entitlement for the school is **82⁷** pupils, which represents 20.97% of the total FTE, which places the school in Band 1 for funding purposes.

The school received £0 for Small Schools Support funding, which represents 0.00% of the maximum funding for this factor, within the Nursery & Primary funding stream.

The school also received £0 in respect of Primary Principals' Release Time.

⁷ The school's funding allocation is based on the previous year's census data (e.g. the October 2021 census data was used to determine the 2022-23 CFF allocation). **The census data on the Schools+ database relates to an academic year, as opposed to the financial year.** In addition, differences between funded pupils and total pupils within the census count may occur for a number of reasons, including, but not limited to, zero rated pupils, some reception pupils, and over age pupils (paragraph 7 of Annex B to the Common Funding Scheme refers).

Details of the school's budget allocation from the Common Funding Formula, for the last 3 years, is as follows:

Factor	2022-23 £	2021-22 £	2020-21 £
Pupil AWPU	1,063,115	1,058,893	935,807
TSN – Social Deprivation	53,678	57,460	53,896
TSN – Additional Social Deprivation	2,379	2,564	2,484
Premises Area	18,691	18,691	18,691
Premises FTE	34,725	34,382	32,402
Foundation Stage	47,746	49,498	48,096
Teachers Salary Protection	5,836	2,577	0
Traveller Children	4,744	3,558	4,417
Children Looked After	3,558	1,186	1,104
Newcomer Children	69,969	58,703	44,166
Landlord Maintenance	28,202	28,202	28,202
Administration Costs	50,780	50,540	48,020
Special Units	3,000	0	0

Total School Funding	1,386,423	1,366,254	1,217,285
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Pupil FTE (no.)	406.50	404.50	383.50
Per Capita	£3,411	£3,378	£3,174

B. School Admissions Team (SAT)

Temporary Variations

If a school receives more applications for admission than it has places available it can request a Temporary Variation (TV) of its admissions and/enrolment number from the Department. The Department may approve TVs to a school's numbers to respond to particular demographic pressures in an area in a particular year.

When considering a TV request from a school the Department will look at the availability of places in that sector in the area within a reasonable travelling distance of each pupil's home address. For primary schools, in relation to TV requests, DE defines 'reasonable travelling distance' as a distance of two miles from a child's home.

It should be noted that a TV is granted on the condition that no additional accommodation will be involved. TVs are not granted to address anticipation of demand, nor a long term desire to increase the size of a school within an area. In previous years Enniskillen Integrated PS has had TVs approved as follows, and none have been submitted since the TV in April 2018:

School Year	Approved Admissions Number	Approved Enrolment Number	Temporary Variations Approved (To total of)*	
			Admissions	Enrolment
2021/22	56	392	-	-
2020/21	56	392	-	-
2019/20	56	368	-	-
2018/19	56	347	62	349
2017/18	56	326	-	-

*Figures do not include stated children (all year groups) or any children who may have been admitted by appeal (year of admission only).

Year	Admissions Number	First Preferences	Total Applications (all preferences)
2017/18	56	50	54
2018/19	56	60	62
2019/20	56	50	50

2020/21	56	73	73
2021/22	56	45	45

*Excludes children with a statement of special educational needs.

C. Education Workforce Directorate

No issues or concerns have been identified, from a policy perspective, in respect of this development proposal for teaching and non-teaching staff.

Should the case be approved and subsequent staffing issues are identified, assurances should be sought from the Education Authority that any potential impact on terms and conditions of teaching and non-teaching staff are managed in accordance with the following policies:-

- **TNC 2011/8 – Workload Agreement:** should the Case for Change result in an increase to enrolment in a school, or surrounding schools, assurance should be provided regarding how potential impact on teacher workload, as a result of the increased class size, will be managed.

D. Inclusion and Wellbeing Directorate

There is no reference in the Case for Change to any special educational needs (SEN) considerations.

SET cannot provide any commentary, but if the DP is approved, any impact on pupils with SEN should be considered and managed effectively.

E. Promoting Collaboration, Tackling Disadvantage Directorate

STAGE 1

Current Position

Enniskillen Integrated Nursery Unit, in partnership with Holy Trinity Nursery School and Enniskillen Nursery School, is currently engaged in the funded SESP Transition Phase.

Enniskillen IPS is the Lead school in the (DE) Pilot Early Years Cluster. It is also the lead school in the annual joint staff CPD – reaching out to local schools to share good practice and has been a partner school in the Fermanagh Shared Education programme.

The Nursery Unit and Playgroup Nursery Unit participates in The Shared Education Programme

List of neighbouring <phase> schools provided by Area Planning

Area Planning do not provide a snapshot (list of schools including ref number) for Pre-school DPs only a map, without school ref number SECRT is unable to establish which if any of the schools within the area are involved in a funded Shared Education Programme.

School		Programme	Membership
Ref No	Name		

SECRET CONSIDERATION

The Case for Change

- The Proposer (Board of Governors) set out the role of Enniskillen Integrated Primary School and Nursery Unity in Shared Education but make no reference to any positive or negative impact this DP might have.
- The Education Authority make no reference to Shared Education.
- The Pre-school Education group support the application on the basis of parental demand but express concern for potential impact on existing well established cross community provision across Fermanagh iro the duty to promote, encourage and facilitate Shared Education.
- During the pre-publication consultation phased five responses were received from affected schools, one response was received from a local politician and one response was also received from the Controlled Schools' Support Council. No reference was made to Shared Education in any of these responses.

SECRET ASSESSMENT

- (a) There is insufficient evidence in the Development Proposal to suggest a positive or negative impact to Shared Education partnerships in the area.

STAGE 2 – POST PUBLICATION COMMENTS

Post Publication Reponses

A summary of the post publication responses received which reference Shared Education has been provided by Area Planning Team - ED1/22/9918

Comments from the schools listed below suggest a potential negative impact on Shared Education within the area:

Enniskillen Nursery School

- Board of Governors notes that DP 664 refers to the commitment of Enniskillen Integrated Primary School to the Shared Education Partnership, of which we are the lead school. Unfortunately, the over provision of pre-school nursery places caused by Enniskillen Integrated Primary School's afternoon session has meant that it is no longer viable to continue in the Shared Education programme as it is not appropriate for two year olds to be involved in. This has caused us great sadness as Enniskillen Nursery School remain fully committed to the principals of Shared Education.
- The continued Development Proposals by Enniskillen Integrated Primary School creates an increased workload for the Principal of Enniskillen Nursery School, threatens the viability of the outstanding pre-school educational

settings already offered in the area and has already damaged school community relations.

Jones Memorial PS

- Jones Memorial PS and Holy Trinity Primary School have been partaking in a program within Peace IV for over 4 years and both schools have a strong positive working relationship established between the different sectors. The shared education programmes, inc Extended Schools Cluster and Peace IV, has been extremely beneficial in encouraging young people to work together to overcome barriers.
- If approved, this proposal has the potential to put strain on the pre-school providers in the area and could be divisive and create competition between pre-school settings. Consequently, this would be detrimental and could threaten the very successful and valued shared education programme that currently exists.

There may be value in contacting EA/CCMS to make them aware of the comments made by both Enniskillen Nursery School and Jones Memorial PS in regard to Shared Education.

SECR ASSESSMENT

Comments received during the post publication stage of the Development Proposal suggest a negative impact to Shared Education partnerships and community relations within in the area.

ACTION:

SECR Team would want to advise EA/CCMS, as appropriate, of the comments received relating to Shared Education.

EA Comments

Just a few further comments in relation to the Enniskillen IPS (Nursery Unit), Enniskillen NS & Holy Trinity (Nursery Unit) Shared Education Partnership. There was a communication to EA in 2020/21 indicating that there was a breakdown in relationships between school leaders, within the partnership, as a result of the Development Proposal. This resulted in the partnership withdrawing for 2021/22 Transition Phase.

Holy Trinity are currently within a partnership as part of CASE Peace IV. However the applications for Mainstreamed SE were issued to all schools formally within SESP. This can allow the schools to re-apply or to apply as a smaller partnership if necessary.

We are currently engaging in a mapping process for all schools not engaged in SE. We will seek to provide all schools with partnership options and this may also include the above schools if they are not engaged in Mainstreaming. As always we will do our best to provide options but it will be the choice of the school(s) as to their level of

engagement in SE. We can never guarantee a solution but, with the available resources within EA, we will explore opportunities.

F. Transport And Food In Schools

Transport not applicable to pre-school provision and nil return from Food in Schools Team.

G. Early Years Team

- 1. Introduction**
- 2. Background**
- 3. Level of need for pre-school education provision**
- 4. Integrated education**
- 5. Recent changes in provision**
- 6. Temporary flexibility**
- 7. Reception provision**
- 8. Impact on voluntary and private sector providers**
- 9. Ensuring the best use of public resources**
- 10. Consultation responses**
- 11. EA comments**
- 12. Summary of key points**
- 13. New and Compelling Evidence**
- 14. Conclusion**

1. INTRODUCTION

At the request of the Board of Governors of Enniskillen Integrated Primary School, the Education Authority (EA) has published Development Proposal Number 664, proposing that pre-school provision at the school is expanded through the establishment of a single pre-school afternoon session to provide an additional 26

place part-time pre-school places from 1 September 2022 or as soon as possible thereafter.

Enniskillen IPS currently has a statutory nursery unit, funded through the Pre-School Education Programme (PSEP), which provides a part-time pre-school session in the morning with an enrolment of 26 children.

The CfC advises that the school is not seeking full-time nursery places; but the ability to offer an afternoon session in the nursery building which will better match the Year 1 provision, which has an admission number of 56 (CfC page 11).

The CfC also advises (CfC page 11) that since 2016, the school has provided an afternoon playgroup session funded by the Integrated Education Fund (IEF) to meet parental demand for integrated pre-school provision. The teacher in the morning nursery unit is also the leader of the afternoon playgroup session (CfC page 14).

The CfC claims that all children who attended either the Nursery Unit or Playgroup during 2019-2020 applied for a Year 1 place at the school in September 2020 and considers it a smooth transition for both the children and the families (CfC page 11).

The CfC further states that in 2019/20, the number of places available in the afternoon session was extended to 26 to meet parental demand (CfC page 14). The CfC does not, however, provide any information as to whether the children attending this session are of target age, and/or also attend funded PSEP provision in the mornings. The Department sought this additional information in order to aid its consideration of the proposal, and this is recorded below as appropriate. From the information provided by NICIE, 16 of the 26 children currently attending the non-PSEP afternoon session in the 2021/22 academic year are target age. Further subsequent information was, however, received from NICIE in May 2022 in which NICIE advised that the non-PSEP afternoon session provides only 16 places, not 26 as set out in the CfC.

2. BACKGROUND

Two previous Development Proposals (DP No.488 & DP No.543) requesting additional nursery provision at Enniskillen IPS were not approved in 2017 and 2018 respectively. The CfC for the current Development Proposal seeks the same additional nursery provision as previously requested, i.e. an additional 26 part time statutory pre-school education places through the provision of an additional afternoon session.

In restarting and reinvigorating Area Planning on 21 October 2020, former Minister Peter Weir advised that 'where previously submitted proposals are brought forward again, the Area planning teams will expect to see clear and compelling NEW evidence that supports their publication'.

The current proposal has been considered against the current context, and so reflects any changes and updated information since DP No.488 and DP No.543, including any changes to the pattern of pre-school applications and the level of provision in the area.

The CfC states that Enniskillen IPS NU is the only statutory nursery in the ward that does not have either full-time pre-school places or double intake (CfC page 9). It claims that this current status with the mismatch of provision and the refusal of the recent proposals have implications under the development of integrated education as set out in Article 64 of the Education Reform (NI) Order 1989.

The CfC asserts that decisions in relation to DP No.488 and DP No.543 did not fully take account of the fact that the catchment for Enniskillen IPS actually covers most of County Fermanagh and is therefore much broader than just the local wards (CfC page 11).

The CfC also advises that as a result of the previous decisions to turn down DP No.488 and DP No.543, the part-time afternoon session at the school is now registered with Social Services, which is causing an additional unnecessary administrative burden to the school (CfC page 14).

The CfC argues that as the school now has a double class intake in Year 1 following approval to DP No.240 in 2014, only offering 26 part-time places in the Nursery Unit is not encouraging or facilitating the development of integrated education in Co Fermanagh (CfC page 11). Despite this assertion, the CfC sets out evidence of strong enrolment trends in Year One, with no fewer than 52 first preference applications for 52 year one places in each of the last 4 years. In 2020/21 the school received a total of 75 applications for entry in to year one.

In its summary, the CfC also claims that the use of underage children and P1 proxy measures could be viewed as unreliable and inflexible, and therefore the inference of displacement arising from the assessment of over provision, using these measures, is flawed (CfC page 33). Further EYT comment on this is provided at sub-heading 13 below.

Relevant Policies, Practices and Duties

The main policies, practices and duties relevant to this proposal are:

<p>The aim of the Pre-school Education Programme is to provide a funded pre-school education place for every target age child whose family want it.</p>	<p>The CfC focuses on a parental preference for pre-school places with an integrated management type, rather than unmet demand for pre-school education provision generally.</p> <p>The EA has advised that sufficient provision exists to meet current demand for pre-school places in the area.</p> <p>This is considered in more detail below.</p>
<p>Learning to Learn – A Framework for Early Years Education and Learning</p>	<p>Published on 7 October 2013, among its key actions is 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. This proposal is in line with the current moratorium.</p>
<p>Encourage and facilitate the development of integrated education</p>	<p>Under Article 64 of the Education Reform (NI) Order 1989 (integrated education), the Department of Education (DE) has a statutory duty to ‘encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman</p>

	Catholic pupils'. This duty is considered in more detail below.
Displacement of good quality pre-school education provision already in existence	It is 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 this DP is for pre-school provision at a grant maintained integrated primary school, it is considered in the context of DE's statutory duty. The potential impact of this proposal on existing provision is considered in more detail below.
Ensuring the best use of public resources	In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it. In light of this, it aims to fill available pre-school education provision as far as possible with target age children, avoiding over provision and the resulting enrolment of children under 3 years and 2 months (underage children) in statutory settings. This is considered in more detail below.
Reception provision	A key action under the Learning to Learning framework is the removal of reception provision. Enniskillen IPS does not have reception provision. In 2020/21 there was one setting within the five mile radius which provided reception places. This is considered in more detail below.

3. LEVEL OF NEED FOR PRE-SCHOOL EDUCATION PROVISION

In determining the need for pre-school education provision, the Department generally assumes a level of provision at 95% of target age children, predicated on the application rate for pre-school education places, which is c.93%; however the level of provision within local areas may be higher or lower, based on historic patterns of demand and assessment of ongoing need.

The current level of pre-school education provision within both a two-mile and 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.

The number of pre-school education places and associated percentages are measured against the Year One enrolments for the 2018/19, 2019/20 and 2020/21 academic years using school census data together with provisional 2021/22 data provided by the EA and ASU.

As the afternoon session at Enniskillen IPS is not PSEP provision, it is not included in the tables below.

The statistical information available in relation to the level of funded pre-school education provision is as follows:-

Level of Provision – two mile radius of Enniskillen IPS.

Table 1

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision	P1 places	Level of pre-school provision (%age of P1 places)	Underage children in statutory places
2018/19	156	47	0	203	192	105.7%	25
2019/20	156	47	0	202	188	107.4%	7
2020/21	156	30	0	186	203	91.6%	10
2021/22	156	39	0	195	175	111.4%	20
Proposed	182	39	-	221	175	126.3%	-

Source: ASU

The level of pre-school education provision within a two mile radius has been higher than the planning figure of 95% in three of the last four years. Only in 2020/21 was the level of provision below the planning figure and although there was a decline in the number of pre-school places available in this year, there was also an uplift in the number of Primary One places which would also have contributed to the level of provision only being 91.6%. Despite this drop in provision, 10 underage children still received funded pre-school places in the area in 2020/21.

Based on the figures for 2021/22 the level of provision in the two mile radius has returned to a level similar to that of 2018/19 and 2019/20 due in the main to a small increase in the number of pre-school places and a reduction in Primary One places from 2020/21.

Should the proposal be approved, the proposed level of provision (at 221 pre-school education places) is 55 places higher than would be necessary to achieve the planning figure of 95% provision (166 pre-school education places would provide 95%). This suggests over provision, particularly in the context of the increasing number of underage children in statutory pre-school education places, with 20 underage children receiving a funded pre-school education place within the two mile radius in 2021/22.

The CfC, however, argues that the use of underage children as a criterion is unreliable as it fluctuates year to year and does not therefore constitute a trend (CfC page 32). Underage children may only receive a funded pre-school place when places remain available in a statutory pre-school setting after applications from target age children have been considered. While the presence of underage provision is not, in itself, definitive evidence of over provision in an area, it is an important indicator, which is considered by the Department in conjunction with a range of other relevant factors as set out in this advice. In the case of this DP, the presence of significant numbers of underage children in each of the last four years, coupled with the high level of provision, and the fact that the number of first preference applications is lower than the number of pre-school places available in both the two mile and five mile radii (186/194 and 202/217 respectively), indicates that sufficient provision is already available.

The afternoon session at Enniskillen IPS is not reflected in Table 1 above. The CfC advises that in 2019/20 this session was extended from 16 to 26 places to meet demand (CfC page 14). Further clarification was, however, received from NICIE in May 2022 in which NICIE advised that the non-funded afternoon session at the school only provides 16 places (all of which are filled with target age children) and not 26 places as stated in the CfC. It is unclear from the information provided whether the setting received sufficient applications to fill 26 places it is registered for.

The additional information provided by NICIE and the Education Authority demonstrates that:

- i. All 16 of the children attending the afternoon session are target age;

- ii. 8 of the 16 target age children attending also attend an alternative PSEP funded pre-school setting in the morning;
- iii. 4 of the children received an offer of funded pre-school place in an alternative setting but this was refused by the parents;
- iv. 2 of the children attending did not receive an offer of a funded pre-school place in any alternative setting; and
- v. 13 of the children had listed Enniskillen IPS NU as their 1st preference setting in their pre-school application.

The analysis set out above suggests that, while there is sufficient pre-school education provision in the area to cater for overall levels of demand, there may be insufficient provision to meet the level of preference for pre-school education provision of an integrated management type. The additional data provided suggests that while there may be an additional element of demand for pre-school education provision that is not currently being met by the PSEP, the level of this demand may not appear to be sufficient to sustain a 26 place statutory pre-school education class.

Level of Provision – five mile radius of Enniskillen IPS.

Table 2

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision	P1 places	Level of pre-school provision (%age of P1 places)	Underage children in statutory places
2018/19	182	96	4	278	280	99.3%	31
2019/20	182	99	9	280	275	101.8%	8
2020/21	182	72	3	254	309	82.2%	17
2021/22	182	85	3	267	238	112.2%	20
Proposed	208	85	-	293	238	123.1%	-

Source: ASU

The level of provision within the five mile radius has also been higher than the planning figures in three of the last four years, again suggesting over provision in the wider area. Similar to the two mile radius the drop in the level of provision in 2020/21 can be attributed to a reduction in the number of funded places available together with a significant increase in the number of Primary One places, which based on NISRA data appears to have been caused by a spike in the number of live births in the area in 2016.

If approved, the proposed level of pre-school education provision within the five mile radius would increase further, to circa 123% (equivalent to 67 places higher than what would be necessary to achieve the target figure of 95%). This, combined with the increasing number of underage children accessing pre-school education provision (20 in 2021/22), suggests there is already sufficient pre-school provision in the wider area.

A list of the providers in the two and five mile radii is attached at Annex A.

4. INTEGRATED EDUCATION

Context

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 duty under the 1989 Order must be considered alongside 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). It is important that the Department strives to meet demonstrated parental preference in an area for pre-school education at grant-maintained and controlled integrated primary schools. In discharging these duties it is essential that the Department does not inadvertently constrain the development of integrated education.

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 Early Years Team (EYT) advice.

Integrated Education in the area

There are no other pre-school education settings with an integrated management type within the local area and there are no other integrated primary schools within a 25 mile radius of Enniskillen IPS.

The closest statutory integrated pre-school education provider is Omagh IPS which is over 25 miles away. If this proposal is approved it is not expected that this would have any impact on provision at Omagh IPS.

The CfC (page 16) sets out that the nursery unit at Enniskillen IPS has been oversubscribed in each of the last three years, by between 19 and 34 1st preference applications (see Table 3 below). These figures suggest that parents in the area may have a preference for pre-school education provision with an integrated management type and that an additional afternoon pre-school session providing 26 part-time places may become sustainable in the longer term.

The CfC states that the school is serving a very wide catchment area with a rural population and 74.4% of the nursery pupils travelling more than 2 miles and nearly 26% travelling between 5 and 10 miles. (CfC page 20). This, along with the stated popularity of the school's afternoon session and 100% of parents in response to the consultation supporting the proposed change, suggests that parents in the area may have a preference for education provision with an integrated management type and are willing to travel a greater distance to access this provision, as suggested by the case for change.

Table 3 below shows the first preference application rates for Enniskillen IPS Nursery Unit over the last 3 years.

Table 3

Year	First preference applications	Total admitted

2019/20	60	26
2020/21	45	26
2021/22	45	30 *

Source: Education Authority

* includes 4 additional children approved through Temporary flexibility

The pattern of pre-school applications for Enniskillen IPS NU would suggest that parents in the Fermanagh area may have a preference for pre-school education provision with an integrated management type over pre-school education provision of other management types, including provision in a standalone nursery school.

NICIE Comments

NICIE submitted its comments on DP 664 to DE on 29 November 2021. A summary of some of the points as raised by NICIE are set out below. EYT consideration and responses, as appropriate, are set out in this paper:

- Parental demand for Integrated nursery provision has been demonstrated very clearly year on year. The figures show that the school could have filled a second session on total applications in eight of the last 10 years and in two out of the last three years with first preferences alone.
- The birth rates in the wards that act as feeders to Enniskillen IPS has not declined since 2014 and has remained steady at an average of 602 per year. Thus, there is no decline in the relevant age cohort size in the area surrounding Enniskillen IPS.
- Much of the statutory provision in the area is over-subscribed, especially the full time provision. However, there appears to be a shortfall of provision, against first preferences, of approximately 20 places for 2018/19; 69 for 2019/20, 35 for 2020/21 and 41 places for 2021/22. Given that Enniskillen IPS is supplying 16 playgroup places then the shortfall in the 5 miles' radius is significant.
- In 2021/22 underage admissions increased in Enniskillen Nursery Unit after 2 years of very low underage admissions. This gives further evidence to NICIE and the Board of Governors' assertion that the underage admissions is not a trend but varies year to year. Thus, using the underage figures as a criterion

for making a decision about the long-term future of the school and its sustainability would appear to be an unreliable metric.

- The Board of Governors and NICIE would contend the issue of underage children is as a result of the failure by DE to implement fully the recommendations outlined in Learning to Learn - A Framework for Early Years Education and Learning October 2013.
- In addition, it would seem that a lack of advice to parents to apply for part time provision when they are applying for full time provision has resulted in the acceptance of a high number of 2 year olds.
- The cost of two-year olds in the statutory system has been cited as a reason for refusal to enable integrated schools to grow. It seems unfair to NICIE and the Board of Governors that these problems are being laid at the door of Enniskillen IPS and used to prevent its growth. The Governors and NICIE would contend this school should not be prevented from growing in response to demonstrated parental demand when the premise of underage children is not a reliable criterion.
- The problem being addressed is not of the integrated schools making but rather the failure of DE to implement its own recommendations and a more localised failure to manage the application process effectively.
- There is a disparity between the P1 proxy figures, the 1st preference and the total pre-school provision. NICIE would argue that it is clear that Enniskillen town is serving as a hub area for pre-school provision. As the maps in the Case for Change indicate Enniskillen IPS is serving a very large area of rural Co Fermanagh. As NICIE has pointed out before, EA PEG is using birth rate statistics and 1st preferences to plan for total pre-school provision, whereas DE are using P1 proxy figures to decide on development proposals. This leads to a situation where DE is using figures which are looking back at the P1 population to predict future need.
- In this area, the disparity between the three sets of figures (P1, 1st Preference and Pre-School provision) shows that the use of P1 figures, given the hub nature of Enniskillen is creating a barrier to the further growth of Enniskillen IPS. Using the P1 proxy figures, it appears that there is over-provision when in fact there is a closer match between 1st preferences and total pre-school

figures than there is between P1 provision figures and total pre-school provision or 1st preferences.

NICIE Reasons to consider approval

- The school wants to match the provision in the nursery unit with the two-form entry in the primary school and deal with a very high level of over-subscription in the nursery unit. Approval would support the growth of the two-form entry which started in 2014.
- The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). NICIE would argue that transition and continuing professional development are both more easily achieved in a nursery unit setting than a voluntary playgroup.
- This change would support the school to deliver improved outcomes for children and help a sustainable school to be sustainable into the future.
- It provides value for money for the statutory sector as no capital is required because a permanent building has already been sourced.
- It would allow for more efficient and effective ways of funding and administering the early years provision.
- It would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion.
- NICIE contends that if DE was to approve the conversion of the existing (non-PEAG funded) playgroup at Enniskillen IPS, it would represent replacement rather than displacement of an existing playgroup.
- Parents and children will enjoy a more seamless approach to education with an easier transition to primary education.
- NICIE believes that supporting this expansion of pre-school provision would be a low cost and positive step to support a currently sustainable Integrated school and would remove an obstacle to supporting its possible further growth in years to come.

5. RECENT CHANGES IN PROVISION

Holy Trinity Pre-School, a non-statutory pre-school education provider, which provided 16 pre-school education places within the five mile radius of Enniskillen IPS in 2019/20, left the PSEP in June 2020 as it received fewer than the minimum number of pre-school applications in the 2020/21 admissions process and there was sufficient funded pre-school education available in the area to address demand for that academic year. This setting has, however, returned to the PSEP in the 2021/22 academic year providing 8 funded pre-school places. This has been taken into account in the statistical information presented above.

It is noted that, even if this setting were to be removed from the calculations, that the proposed level of provision within the two mile radius (106.9%) would still be significantly higher than the planning figure and would be similar to the number of first preference applications received (186).

6. TEMPORARY FLEXIBILITY

Enniskillen IPS NU requested four additional places in 2021/22. The EA PEG supported this and the request was approved. In recommending approval to this request, the EA PEG commented that whilst spare capacity still remains within other pre-school settings within a 2 and 5 mile radius the TF was considered on the basis of the statutory duty and no other integrated pre-school provision exists within a 5 mile radius.

Enniskillen IPS NU has also submitted a TF request for four additional places for the 2022/23 academic year. Again this request was supported by the EA PEG and the request has been approved. In recommending approval the EA PEG commented that whilst the data shows there is sufficient pre-school provision within a 2 and 5 mile radius, the TF has been considered on the basis of the statutory duty and no other integrated pre-school provision exists within a 5 mile radius.

No other Temporary Flexibility requests were submitted from any of the schools in the five mile radius for the 2018/19; 2019/20; and 2020/21 academic years.

A list of Temporary Flexibility requests in the area is attached at Annex D.

7. RECEPTION PROVISION

Jones Memorial PS, which is within the five mile radius of Enniskillen IPS, is the only setting in the area which provides reception places. It provided reception places for 4, 9, 3 and 3 children in the 2018/19, 2019/20, 2020/21 and 2021/22 academic years respectively; it does not have a statutory nursery unit.

Given the number of places involved and the geographical distance between the settings, EYT considers that any change to pre-school education provision at Enniskillen IPS would be unlikely to significantly affect reception provision at Jones Memorial PS, nor would the cessation of reception provision in the area significantly affect the proposed provision of Enniskillen IPS.

8. IMPACT ON VOLUNTARY AND PRIVATE SECTOR PROVIDERS

The PSEP is a partnership between statutory and voluntary/private pre-school education providers and both sectors are equally valued for their contribution to the education of pre-school children. Both sectors adhere to the same curricular guidelines and are inspected to the same educational standards. In considering DPs for statutory provision, careful consideration is given to the impact of any new provision on existing good quality voluntary/private providers in PSEP.

The CfC argues that displacement of existing good quality pre-school education provision should not be used as a reason to not approve this Development Proposal as, it claims, the school operated afternoon Playgroup has not affected local providers, and any displacement that may have occurred has already happened (CfC page 30). It further argues that DE accepted that this was likely to be the case when giving approval to the Millstrand IPS application for a second nursery session in May 2019 where the playgroup had also been operating for several years.

The CfC (page 16) also sets out that Enniskillen IPS nursery unit has been consistently oversubscribed. The EA has advised that the setting received 45, 60 and 51 first preference applications for the 26 funded pre-school education places at

stage one of the pre-school admissions process for the 2020/21, 2021/22 and 2022/23 academic years respectively. While not at a level that would fill a second pre-school unit every year with first preferences alone as asserted within the NICIE submission, this is nonetheless a high level of parental demand. Following approval of Development Proposal No. 240 in 2014, Enniskillen IPS now offers 56 places for Year One. Since DP No. 240 was approved, the intake for Year One at the school has varied in each of the last four years with an intake of 61, 52, 63 and 53 pupils respectively.

The Year One intake figures and the number of first preference applications for the existing pre-school provision may suggest that additional pre-school provision at the setting could be sustainable.

As previously stated, the Department requested additional information regarding the non-DE funded afternoon session Enniskillen IPS, in order to aid its consideration of the CfC. A breakdown of the information provided is attached at Annex E.

The afternoon session at Enniskillen IPS is registered for 26 children. Further clarification submitted by NICIE in May 2022 advised that the afternoon session only provides 16 places all of which are filled by children of target age. Thirteen of these children had listed Enniskillen IPS NU as their first preference in the 2021/22 pre-school admissions process. However, 8 of the target aged children also attend a PSEP-funded morning session at an alternative pre-school setting, meaning that for them, the afternoon session represents a duplication of provision.

Based on this information it would appear reasonable to conclude that there is a level of unmet parental demand for provision of an integrated management type. Based on this year's figures, that figure could be set as high as 16 places, although with 8 of those places representing potential displacement from other funded provision.

The proposed change, if approved, could therefore impact on other local provision. A non-statutory pre-school education provider which provided 16 pre-school education places within the five mile radius of Enniskillen IPS in 2019/20, left the

PSEP in June 2020 as it received fewer than the minimum number of pre-school applications in the 2020/21 admissions process due to the high level of provision in the area. This setting did re-join the PSEP in September 2021, however, it is only providing 8 funded places in the 2021/22 academic year.

The number of first preference applications in the area is lower than the number of pre-school places available in both the two mile and five mile radii (186/195 and 202/217 respectively), indicating that sufficient provision is already available.

If 26 additional pre-school places are created in the area, it is possible that further displacement could occur.

9. ENSURING THE BEST USE OF PUBLIC RESOURCES

In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it. In light of this, it aims to maximise available pre-school places for target age children, avoiding over provision and the resulting enrolment of children younger than 3 years and 2 months (underage children) in statutory settings.

There have been up to 31 underage children attending pre-school settings within the five mile radius in each of the last four years, with 20 underage children having been offered a place within Enniskillen Nursery School (situated within a two mile radius) for the 2021/22 academic year.

The CfC (page 31) states that the issue of underage children has been of great concern to the Department for decision making on the previous proposal and other integrated proposals and has been used as a criterion for making a decision about the long-term future of the school and its sustainability when it would appear that the figures of underage children in settings are not a trend but vary year to year and do not appear to be linked to application numbers. The CfC adds that the Governors and NICIE contend that this school should not be prevented from growing in response to demonstrated parental demand when the premise of underage is not a reliable criterion and the problem being addressed is not of the integrated schools making but rather the failure of DE to implement its own recommendations.

The DE position on this is clear; the presence of underage provision is not, in of itself, definitive evidence of over provision in an area. It is, however, an important indicator, which is considered by the Department in conjunction with other relevant factors as set out in this paper.

NICIE has commented that the proposal represents a straightforward change of funding/management status for the existing IEF-funded afternoon session. However, as set out above, this session is only currently attended by 16 target age children, eight of whom also attend other PSEP provision. In addition, the additional provision requested is not 16 places, but 26, so it is not accurate to suggest that it is “merely an adjustment of the funding”.

10. CONSULTATION RESPONSES

The CfC states that in May 2020 the Board of Governors of this school fully supported re-submitting the Case for Change as they unanimously agreed in the strength of this proposal (CfC page 2). It adds that this development proposal was consulted on again with the Board of Governors recorded in November 2020 and received full support. Staff and parents were consulted in May and June 2020 respectively and again in December 2020 when 100% support was received to the proposal with no opposition recorded.

A pre-publication statutory consultation exercise was also carried out with schools that may be impacted by the proposal between 5 May 2021 and 3 June 2021. There were five responses received from affected schools together with a response from the Controlled Schools Support Council and a response from the Rt Hon Arlene Foster MLA. It is reported that four of the schools that responded did not support the proposal. The fifth school that responded was Erne Integrated College which indicated its support for the proposal.

Neither the Controlled Schools Support Council nor the Rt Hon Arlene Foster MLA supported the proposal.

Samples of the comments received from the respondents can be found on pages 4 to 6 of the Case for Change.

EYT notes that comments received during the statutory objection period include concerns from public, Deborah Erskine MLA and Jones Memorial PS pre-school regarding the falling birth rates in the area and the potential detrimental impact on other existing pre-school providers in the area should DP664 be approved. They have also raised issues regarding some children allegedly attending PEG funded pre-school provision in the morning and then attending the IEF funded provision at Enniskillen IPS in the afternoon, thereby the school double counting the children.

It is also noted that 18 letters of support for the proposal were also received during the statutory objection period together with 2 further letters of objection.

11. EA COMMENTS

The EA has advised that the proposal was discussed by its Strategic Planning and Policy Committee at its meeting on 16 September 2021. The EA has commented that it is concerned that the implementation of this proposal will result in increased costs for the existing provision which is already in excess of demand. It adds that any additional pre-school provision within the area will detrimentally impact on current non-denominational pre-school providers both statutory and non-statutory. The EA also recognises the parental demand as outlined in the CfC and acknowledges the PEG recommendation, the guidance provided by DE and its duty to assist the DE statutory requirement to encourage and facilitate integrated education.

The EA PEG also considered the DP in line with guidance provided by DE regarding pre-school education and the statutory duty to encourage and facilitate integrated and Irish-Medium education and provided the following comments:

- *It is important the Education Authority and the PEG support the Department in fulfilling its statutory duty by striving to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish Medium pre-school education;*
- *In this context the PEG supports the Development Proposal on the basis of demonstrated parental demand as evidenced by (i) the number of 1st preference applications (45 for 26 places); and (ii) overall enrolment trends for the school and the Year 1 intake over a number of years, which would suggest that a 52 place nursery unit would be sustainable;*

The EA PEG, however, noted concerns in regard to the potential impact of this additional provision, including:

- *Potential displacement of existing funded pre-school education provision in the area. An existing privately funded playgroup is currently in operation at Enniskillen IPS;*
- *Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds;*
- *Impact on existing well established cross-community provision across the Fermanagh area in respect of duty to promote, encourage and facilitate Shared Education policy;*

The analysis above has considered the issues of displacement and underage access to provision. The issue of Shared Education will be considered in colleagues' inputs.

The EA PEG also added that there is no unmet demand for pre-school education places in the area and spare capacity exists within non-statutory pre-school settings to address demand, if necessary.

12. SUMMARY OF KEY POINTS

The following summarises the key points taken into consideration:

- The current level of provision within both the two mile and five mile radii are higher than the planning figure (111.4% and 112.2% respectively). If approved, the proposal; would increase the levels of provision to 126.3% and 123.1% respectively;
- Underage children accessed pre-school places within both the two and five mile radii, with 20 underage children offered a place at one setting within the two mile radius for the 2021/22 academic year. If approved, there is a strong possibility that that this would lead to an increase in the numbers of underage children accessing funded pre-school places in the area;
- If approved, this proposal could have an impact on existing good quality pre-school education provision in the area, which may result in displacement of existing funded places at other pre-school settings;
- NISRA population projections suggest a decline in the pre-school cohort over time;
- Under Article 64 of the 1989 Education Reform (NI) Order, DE has a statutory duty to 'encourage and facilitate the development of integrated education'. This duty relates to education provision in a school with an integrated management type and should be considered alongside the duty under Article 44 of the 1986 Order;
- Pre-school is accessible to all, however, the number of first preference applications at Enniskillen IPS suggest a level of parental preference in the area for pre-school education in schools with an integrated management type;
- Enniskillen IPS operates a non-PSEP afternoon session which in 2021/22 is attended by 16 target age children; 8 of the children also attend a funded pre-school place in an alternative setting;
- There is no other pre-school education provision with an integrated management type within 25 miles; and
- EA PEG supports the proposal in the context of the statutory duty to encourage and facilitate the development of integrated education and demonstrated parental demand but has a number of concerns in regard to the potential impact on other provision in the area and the potential for increased uptake of younger children into statutory nursery settings.

13. NEW AND COMPELLING EVIDENCE

In restarting and reinvigorating Area Planning on 21 October 2020, former Minister Peter Weir advised that 'where previously submitted proposals are brought forward again, the Area planning teams will expect to see clear and compelling NEW evidence that supports their publication'.

Both the Case for Change and NICIE have highlighted what they consider new and compelling evidence the Department should take in to account when considering DP 664. This includes the following

- There is no current decline in the cohort population in the area surrounding Enniskillen IPS
- The use of underage children as a criterion is unreliable as it fluctuates year to year and does not therefore constitute a trend
- The use of P1 as a proxy leads to inflexibility as a projection measure and is inconsistent with the measures used by the Education Authority (first preferences and pre-school provision). The CfC also states (page 29) that although much of the statutory provision is over-subscribed there appears to be a shortfall of provision against first preferences. It adds that it is likely too that the opening of the Enniskillen IPS afternoon playgroup has obscured the extent of the shortfall.
- Since the use of the underage children and the P1 proxy measures could be viewed as unreliable and inflexible, then the inference of displacement arising from the assessment of over provision, using these measures, is flawed.

EYT would offer the following comment:

- The majority of the points raised are commentary on the Departmental processes in relation to Development Proposals in general. They do not constitute new evidence, compelling or otherwise.
- The evidence proffered in relation to birth statistics is incomplete and/or inaccurate. NISRA statistics show a decline in birth rates for all wards which fall at least partially within a five mile radius of Enniskillen IPS. In addition, these statistics also show that population projections for three year olds for

Fermanagh and Omagh council areas predict an overall decrease of approximately 14.8% between 2020 and 2043. The EA has provided evidence to support this, demonstrating that the number of first preference applications within the five mile radius of Enniskillen IPS has fallen from 244 in 2019/20 to 220 in 2022/23. This would appear contrary to the statement made in the new evidence submitted;

- EYT would contend that while the underage figures in the Enniskillen area have varied year on year there is very clear evidence of an upward trend in this area in recent years and any increase in the number of pre-school places in the area may increase further the number of underage children accessing statutory nursery provision.
- As previously stated the presence of underage provision is not, in of itself, definitive evidence of over provision in an area. It is, however, an important indicator, which is considered by the Department in conjunction with other relevant factors. In the case of this DP, the presence of significant numbers of underage children in each of the last four years, coupled with the high level of provision, indicates that sufficient provision is already available.
- Due to continuing decreasing birth rates, increasing numbers of underage children are attending pre-school provision across Northern Ireland. This therefore is an issue that EYT takes seriously and given our statutory duty under Article 44 of The Education and Libraries (NI) Order 1986 whereby the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it, the numbers of underage children accessing funded pre-school places must be taken in to account when considering development proposals for additional statutory nursery provision.
- It is anticipated that legislation will ultimately be brought forward to remove all penultimate aged children from pre-school provision. However, until such times as new legislation is introduced, and in line with Article 44, underage

figures must continue to be a factor when considering proposals for new or additional statutory nursery provision.

- EYT consider that the use of P1 figures as a proxy to help determine the current and projected levels of pre-school provision does not lead to inflexibility. This methodology has been successfully used for a number of years along with a range of other factors as set out in this paper when considering development proposals. It is noted that the CfC itself offered P1 figures as a proxy to support the request for additional pre-school provision at the setting.

- As set out above, the potential for displacement is not based solely, or mainly, on P1 figures as suggested. In the 2021/22 admissions process the number of first preference applications received was lower than the number of pre-school places available within both the two and five mile radii (186/195 and 202/217 respectively). The additional evidence provided by the EA also demonstrates that the number of first preference applications in the area continues to remain below the number of places available. As set out above, several target age children currently attending the afternoon session at the setting also attend PSEP funded provision elsewhere.

14. Conclusion

The CfC for DE 664 advises that the existing part-time morning nursery class at Enniskillen IPS is oversubscribed, and the non-PSEP funded afternoon session is also popular, with up to 16 target age children attending this session in the 2021/22 academic year. This would indicate a demand for pre-school education provision with an integrated management type.

However, it is noted that eight of the 16 target aged children attending the IEF funded afternoon session are also in receipt of a PSEP funded pre-school education place in the morning in an alternative setting, which they are attending. While their attendance at the non-PSEP funded session could be interpreted as a commitment

to integrated provision and has been taken into consideration in the EYT assessment of the level of parental demand, it is, nonetheless, a duplication of funded provision which also must be taken into account when considering the potential impact of the proposal.

The evidence does appear to suggest that some parents' demand for provision in a setting with an integrated management type is such that they have chosen to access provision outside the PSEP, even where there is good quality pre-school education provision of another management type nearby. However, with only eight target aged children not in receipt of a PSEP funded pre-school education place in the area, if DP 664 is approved, it would appear that an additional 26 place nursery class is significantly more than the current level of demand. If approved, it could displace existing funded places and/or increase the number of underage children accessing statutory pre-school places.

Based on the information available, and taking into account the statutory duties placed on the Department, there does appear to be a level of demand for pre-school education provision in a setting with an integrated management type in the area, but the level of evidenced demand is somewhat lower than the requested 26 part-time nursery class, and if approved it is likely to further increase the level of over provision and consequently the high number of underage children attending statutory pre-school settings in the area.

On the basis of all the information presented and currently available, and taking into consideration the relevant statutory duties, EYT can conclude that the proposed provision could be sustainable, but is unable to conclude that the proposed additional provision is necessary or reasonable at this time and if approved could risk the stability of the PSEP programme in the area.

The team notes that, at the time of writing the pre-school admissions process for the 2022/23 academic year has concluded.

Early Years (Pre-School) Team
June 2022

List of the providers in the two and five mile radii of Enniskillen IPS

Two mile radius

Nursery School

2116608 Enniskillen NS

Nursery Units

2036632 Holy Trinity PS

2066549 Enniskillen IPS

Vol/Priv

2AA0348 Squirrels Montessori

2BB0589 Holy Trinity Pre-school

PS no NU

2016152 Enniskillen Model PS

Five mile radius

Nursery Units

2011893 Ballinamallard PS

Vol/Priv

2AB0446 Tiny Tots Cross Community, Enniskillen

2BB0062 Mullanaskea Pre-school

PS no NU

2016003 Jones Memorial PS

2031828 St Patrick's, Mullanaskea

2031890 St Mary's, Mullymesker

Wards which fall at least partially within a five mile radius of Enniskillen IPS

Ballinamallard
Boho, Cleenish and Letterbreen
Castlecoole
Derrygonnelly
Erne
Florence Court and Kinawley
Lisbellaw
Lisnarrick
Portora
Rossorry
Tempo

Population statistics and projections

EYT has considered the NISRA birth rates and population predictions to identify potential future trends.

- Birth statistics by academic year for all wards which fall at least partially within a five mile radius of Enniskillen IPS indicate a small decrease of 9 (2.3%) in the pre-school cohort between September 2020 admissions and September 2022 admissions (391 to 382).

A list of the wards considered is attached at Annex B.

- Population projections for three year olds for Fermanagh and Omagh council areas predict an overall decrease of 233 (14.8%) from 1,569 to 1,336 between 2020 and 2043.

These figures suggest that demand is likely to slightly decrease in the longer term; however they cannot fully take into account population migration and other factors, so can only be indicators of the future pre-school population and not an exact prediction of demand.

Temporary Flexibility

Enniskillen IPS requested four additional places in 2021/22. The EA PEG supported this and the request was approved. In recommending approval to this request, the EA PEG commented that whilst spare capacity still remains within other pre-school settings within a 2 and 5 mile radius the TF was considered on the basis of the statutory duty and no other integrated pre-school provision exists within a 5 mile radius.

Enniskillen IPS NU has also submitted a TF request for four additional places for the 2022/23 academic year. Again this requested was supported by the EA PEG and the request has been approved. In recommending approval the EA PEG commented that whilst the data shows there is sufficient pre-school provision within a 2 and 5 mile radius, the TF has been considered on the basis of the statutory duty and no other integrated pre-school provision exists within a 5 mile radius.

No other Temporary Flexibility requests were submitted from any of the schools in the five mile radius for the 2018/19; 2019/20; and 2020/21 academic years.

Enniskillen Integrated Primary School - Pre-school Play Group Pupils

2021/22

Based on information provided by NICIE 16 target age pupils currently attend the pre-school playgroup in the afternoon.

The EA has provided the following information in relation these children:

- 8 children received a funded pre-school place in an alternative setting and are attending;
- 4 children offered funded pre-school places at alternative settings during admissions process and refused by parents;
- 2 children were not offered a funded pre-school place during the admissions process;
- 1 child engaged in the admissions process in another area of NI but not in Enniskillen;
- 1 child didn't engage in the pre-school admissions process.

Appendix F

Integrated Education Act (NI) 2022 – Additional Supplementary Information

ENNISKILLEN INTEGRATED PRIMARY SCHOOL

Further to the letter from the Department of Education dated 5 January 2023, please find below an addendum to DP (664) to address the issues in the letter regarding the Integrated Education Act NI 2022.

Section 1 of the Integrated Education Act 2022

Section 1 (sub-section a) of the Integrated Education Act 2022

Religious Balance

(a) those of different cultures and religious beliefs and of none, including reasonable numbers of both Protestant and Roman Catholic children or young persons.

Religious Balance at Enniskillen IPS and Nursery School

Enniskillen Integrated Primary School						
School Year	Protestant	Catholic	Other Christian	Non-Christian	No Religion/unknown	Total
2021/22	103	174	34	13	67	391
2020/21	107	175	40	8	61	391
2019/20	105	167	38	9	51	370

* Denotes fewer than 5 pupils suppressed due to sensitive nature and potential identification of individual pupils

Denotes figure >=5 counter suppressed due to potential identification of individual pupils

Source: NI school census

Enniskillen Integrated Primary School (Nursery)						
School Year	Protestant	Catholic	Other Christian	Non-Christian	No Religion/unknown	Total
2021/22	9	16	0	0	6	31
2020/21	10	10	*	0	#	27
2019/20	9	11	*	0	*	27

* Denotes fewer than 5 pupils suppressed due to sensitive nature and potential identification of individual pupils

Denotes figure >=5 counter suppressed due to potential identification of individual pupils

Source: NI school census

Our religious balance for both primary and nursery clearly illustrates our enrolment figures reflect that our school community is of different cultures and religious beliefs and those of none. These figures remain on an even trend for Protestant and Catholic with a slight rise in those identifying as having no religion. It is notable that we have a number of children and families who are identifying as Non-Christian.

The school has also attracted a significant number of Newcomer pupils over recent years as these figures from Schools+ show.

Number of Newcomer pupils in Enniskillen IPS

Year	2017/18	2018/19	2019/20	2020/21	2021/22
Newcomer pupils	24	27	40	50	60

Given that the total number of pupils in the school and nursery is 422 in 2021/22 the number of newcomer pupils equates to roughly a seventh of the school population at 14.2%.

(b)those who are experiencing socio-economic deprivation and those who are not; and

SOA2001_name	Multiple Deprivation Measure Rank (where 1 is most deprived)	Income Domain Rank (where 1 is most deprived)	Employment Domain Rank (where 1 is most deprived)	Health Deprivation and Disability Domain Rank (where 1 is most deprived)	Education, Skills and Training Domain Rank (where 1 is most deprived)	Access to Services Domain Rank (where 1 is most deprived)	Living Environment Domain Rank (where 1 is most deprived)	Crime and Disorder Domain Rank (where 1 is most deprived)
Erne	216	330	175	200	205	460	685	62

As displayed in the table above the NIMDM measures show that the Super Output Area in which Enniskillen IPS is ranked 216 out of 890 and is thus in the bottom quartile of all the Super Output Areas. Enniskillen IPS draws from right across Fermanagh as was demonstrated in DP 664.

FSM levels at Enniskillen IPS in recent years (Source DE Schools+)

Year	2017/18	2018/19	2019/20	2020/21	2021/22
Pupils taking FSM	87	97	91	97	92
Total enrolment P1-P7	332	367	370	391	391
Percentage taking FSM	26.2%	26.4%	24.6%	24.8%	23.5%

Our FSM figures does not reflect the current socio-economic deprivation our school families are currently facing and have been facing. We fluctuate in and out of Extended Schools provision due to our ever-changing FSM numbers. Given that the average FSM uptake for Primary Schools in 2021/22 is 29%, these figures show that Enniskillen is dealing with children who are suffering from socio-economic disadvantage and those who are not. During Covid 19 we used our Extended Schools cluster allocation to purchase National Trust passes for our local facilities for ALL our families and staff, to encourage everyone to get outside and in an attempt to support Emotional Health and Well Being.

In response to the current financial hardships our families are facing we put a complete halt to all Christmas gifts to staff in recognition of this and informed our parents of our wish – this was greeted by them with both relief and thanks – this singly demonstrates how our school steps forward and acknowledges in an honest and practical way to help our families – this has been built through trust with each other, developed over the years.

We have supported families with school uniform by redistributing our uniform donations and recently been awarded a grant from Fermanagh and Omagh District Council to provide all children in February and March with a free breakfast. We are not distinguishing who is entitled to this free breakfast, all children are welcome to a free breakfast.

We used our limited budget resources to employ a Play Therapist one day a week as a result of our observations in the aftermath of Covid 19. This has now been supported by The Department’s allocation of Happy Healthy Minds, but we propose to continue with Play Therapy in an attempt to support our children.

(c)those of different abilities

Assessment of data is used extensively within school to track and monitor all our pupils and staff have invested time to become knowledgeable in the use of data to deliver a curriculum to suit the needs of all our children.

The DE Statistical Bulletin for 2021/22 states that ‘Over 64,500 pupils in schools have some form of special educational need; this is 18.2% of the entire school population. More than 22,000, or 6.3% of pupils, have a statement of special educational needs. The proportion of pupils SEN stages 1-2 was 12.0%.’



SECTION	2017/18	2018/19	2019/20	2020/21	2021/22
Pupils with SEN - non-statement	66	53	46	41	45 (11.5%)
Pupils with SEN - statement	14	16	17	23	29 (7.4%)
Total pupils (reception to year 7)	332	367	370	391	391

This table shows that when comparing the average figures for NI for 2021/22, Enniskillen IPS is very similar to the average for children who are at SEN stages 1-2 and above the average for children with SEN statements.

Our extra-curricular programme is planned and intentional – we focus on delivering a fair programme of sport, taking into consideration the perceived sports in N Ireland. We provide planned opportunities for GAA, rugby, football and netball, all children are welcome to attend, including those with a Statement of Educational Need. Our willingness to self-evaluate our Integration and Inclusion has led us this year to deliver hockey and cricket, as it was missing from our programme.

We employ a Learning Support Teacher who co-ordinates our special needs provision within this school, an intentional school strategy to support our children of different abilities.

We were approached by Area Planning and EA in June 2021 to open a Learning Support Class, we agreed to do this and in September 2021 we opened The Bridges. Within one year we have reached pupil capacity and this class is an integral part of our school community, our second class is due to open in September 2023.

2021-2022 we attained Forest School Status for both our Nursery Unit and school. Outdoor Learning is planned and intentional and allows children of all abilities to learn and thrive outside of the classroom. This has also involved extensive development of our school grounds to establish Forest School. This amazing facility is used by both nursery and school throughout the week by all children and staff. However, on a Friday morning we have left our Forest School accessible to our local schools, playgroups, and nursery units for their own use. Our School Principal is the lead for Early Years in Fermanagh, and this has allowed for staff training for this cluster in our Forest School grounds, training facilitated by our own school staff.

Section 1 subsection (2) of the IE Act 2022

(Subsection 2)

An integrated school has now been defined for the first time in S2 as *‘a school which intentionally supports, protects and advances an ethos of diversity, respect and understanding between those of different cultures and religious beliefs and of none, between those of different socio-economic backgrounds and between those of different abilities.*

and

Section 2 of the IE Act 2022

Purpose of integrated education

2. The purpose of integrated education is—.

to deliver educational benefits to children and young persons.

to promote awareness and appreciation of human rights.

to promote equality of opportunity.

to promote good relations; and

to promote respect for identity, diversity, and community cohesion.

The NICIE Statement of Principles, which is part of the Articles of Association and contains the following four Core Principles:

1. Equality
2. Faith & Values
3. Parental Involvement; and
4. Social Responsibility

These four core principles of Integrated Education represent the cornerstones of the Integrated ethos. Enniskillen Integrated Primary School and Nursery Unit demonstrates its distinctiveness and vision through a purposeful commitment to these principles, in a planned and intentional way.

This was recognised during 2021-2022 when we achieved the Excellence in Integrated Education Award (EIEA) for the second time. This award requires integrated schools to carry out rigorous self-evaluation across their planned and intentional Core Principles and providing substantial evidence to clearly demonstrate this.

Our planned integration is clearly demonstrated throughout our School Development Plan which includes Integration and Inclusion intentionally each year, during 2022-2023 our focus has been on staff Anti-Bias training, led by our Integration and Inclusion Co-Ordinator. We celebrated in Term 1 2022 when we achieved a Carson Award, hosted by The Integrated Education Fund for our submission, ‘What Integration Means to Me.’

Our planned and intentional focus on integration and inclusion is evident in our day-to-day school life and has parental support, clearly demonstrated in our applications to both our Nursery Unit and Year 1 admissions. The September 2023 EA application portal has now closed, and our first preference applications are clearly indicating first preference parental

demand for integrated education in this area. Our nursery first preference applications clearly show we would still be oversubscribed if we currently had a double session, first preference applications far exceeding our provision. Our Year 1 applications are also oversubscribed. We are delighted our Year 1 applications are fulfilling our Admissions Number as we have just moved into our new school building last week and this financial commitment from DE to our school accommodation has been well justified. To maintain our double enrolment in Year 1 the approval of DP 664 is essential to allow us as a school to justify The Department of Education's considerable financial commitment to our new building.