

AMALGAMATION FOR STANDARDISATION PILOT

CONSIDERATION OF REQUEST FOR CHANGE

PORTAVOGIE PRIMARY SCHOOL (PS) & NURSERY UNIT (NU) - DE REF 401-1507

Background

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

The key criteria for participation in the pilot is that a statutory pre-school must have had an actual enrolment of underage pupils of at least 15 or above in three out of the last five years¹ using DE census data. Twelve statutory pre-schools were invited to participate in the initial pilot.

Portavogie PS NU was invited to participate in the pilot and the Board of Governors of the school have requested:

THAT THE EXISTING STATUTORY NURSERY PROVISION AT PORTAVOGIE PRIMARY SCHOOL AND NURSERY UNIT [DE REF 401-1507] WILL BE MODIFIED TO PROVIDE 26 FULL-TIME NURSERY PLACES ONLY WITH EFFECT FROM 1 SEPTEMBER 2024 OR AS SOON AS POSSIBLE THEREAFTER.

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

The Board of Governors have further confirmed that the proposed change is deliverable within the existing provision available in the statutory pre-school setting and not dependent on any new capital or other investment. It is the view of the Board of Governors that the requested provision is sustainable².

The impact of the proposed change, if approved, would be to amend the enrolment figures for the school to replace the current 52 part-time pre-school places with 26 full-time pre-school places from September 2024 or a soon as possible thereafter.

¹ At the time of invitation to the pilot

² ED1/23/217085

Background

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

The standardisation of funded pre-school education provision will be subject to Executive approval and funding and will be informed by detailed engagement with the pre-school sector including via the Scoping Study currently being carried out by consultants on behalf of the DE. The ‘Amalgamation for Standardisation’ pilot is providing an important opportunity to trial mechanisms to facilitate transformation to a longer session length in some settings to help inform wider decisions and planning for a standardised pre-school session length.

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

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

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

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

Background to the school

Portavogie PS & NU is a Controlled Primary school with a statutory nursery unit located on New Harbour Road, Portavogie. The nursery unit has an approved admissions number of 52 part-time pre-school pupils.

In 2022/23, there was an actual enrolment of 48 pre-school pupils. There were five pupils with a statement of Special Educational Needs (SEN) and ■³ pupils with SEN without a statement. There were 13 (25% approved admissions number) underage (penultimate pre-school age) pupils enrolled in the school. The enrolment pattern over the last five years for which census data is available is attached at **Tab A**.

Area context

The school is located within the Portavogie_1 (95BB21S1) Super Output Area (SOA). On the Northern Ireland Multiple Deprivation Measure 2017 Portavogie_1 is ranked 225 out of 890 (with 1 being most deprived and 890 least deprived).

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

Within a five-mile radius, there are currently 2 funded pre-school education providers (listed at **Tab C**). Together these settings provided 104 funded pre-school places in the 2023-24 academic year, with a capacity to provide at least 16 additional statutory places if required. Of the funded places provided, 20 were provided to underage (penultimate) pupils. There were also 24 vacant places within statutory funded pre-school settings.⁴

Within the five-mile radius, 60 first preference applications were received from target aged pupils for the 2023-24 academic year. This sets current pre-school provision in the area at c.173.33%, well above the planning figure.

A PEG analysis (**Tab B**) of NISRA live birth statistics by District Council area shows:

For the 2023-24 academic year:

- significant decline in live births for Northern Ireland by 695 children
- Ten of the eleven District Council areas will have in excess of 100 % pre-school provision (based on current provision) including Ards and North Down LGD where the school is located. (See Table 1)

For the 2024-25 academic year:

³ Number suppressed

⁴ EA figures verified as at 25 October 2023

- A further decline of 512 target aged children.
- Seven of the eleven District Council areas in excess of 100 % pre-school provision, including Ards and North Down LGD where the school is located. (See Table 2)

Within a 5-mile radius of Portavogie PS NU, EA PEG has advised that as of 25 October 2023, there are currently:

- 20 penultimate aged pupils in funded pre-school education places;
- 24 vacant places in funded pre-school settings (all in statutory settings); and
- 16 places potential additional capacity within existing Pre-school Education Programme (PSEP) providers.

NISRA figures predict a population decline of 128 (7.9%) target age children (aged 3) for the Ards and North Down LGD from 1621 in 2022 to 1493 in 2035.

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

Policy context

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

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

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

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

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

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

First preference applications

It is possible with any change from part-time provision to full-time provision that parents may place the setting at a higher preference in their pre-school application than they may have done had the setting continued to provide part-time provision. Portavogie PS NU received 21 first preference applications from target age children for the 2023/24 academic year, which is 5 fewer than the total number of places the pre-school proposes to provide in future years. Given that the intention is for all pre-school settings to move to full-time provision over time, and the fact that the current proposal is coupled with a decrease in pupil numbers, it is not considered that any change in parental preference is likely to have a significant or sustained impact on other settings in the area. The proposed admissions number is in line with the current pattern of enrolment of target aged children, so it is unlikely that target aged children who would have otherwise been accommodated at the pre-school would be displaced as a result of the proposed change.

Statutory Considerations

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

All funded pre-school education settings regardless of location and management type are accessible to children from all backgrounds and are subject to the same inspection standards. All pre-school education settings follow the same curricular

guidance the broad framework of which ensures equality of opportunity, pointing to staff acknowledging and respecting the culture, beliefs and lifestyles of the families of all children. However, it is acknowledged that parents state preferences for pre-school education provision taking into account a wide range of factors, and in some cases, parents may have a preference for pre-school education in schools with a particular management type, including an integrated management type, and this is taken into account in the PSEP Team advice.

Irish Medium and Integrated Education in the area

Under Article 64(1) of the Education Reform (NI) Order 1989 as amended by the Integrated Education Act (NI) 2022, the Department has a statutory duty to encourage, facilitate and support the development of Integrated Education.

There are no pre-school education settings with an integrated management type within the five-mile radius of Portavogie PS NU.

Under Article 89 of the Education (Northern Ireland) Order 1998 the Department has a statutory duty to encourage and facilitate the development of Irish medium Education. Registered Irish medium providers with sufficient children can be funded under the Department's PSEP even where English-medium provision is available in the area.

There are no Irish medium pre-school education settings within the five-mile radius of Portavogie PS NU.

Effective and Efficient Use of Public Funds

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

While recognising the positive work of the EA in planning funded pre-school education provision and matching it to an ever-changing pattern of demand, there is evidence of over provision in some statutory pre-schools which is incompatible with the best use of limited resources and the best interests of target aged children in the area. The Education Authority Pre-School Education Group (EA PEG) Planning report (May 2023) set out that during the 2022-23 academic year, some 1,257 penultimate aged children accessed a funded pre-school education place in a statutory setting, 34 more than the previous year. This is contrary to the aims set out in the Fair Start Report which included an action that DE should "... focus attention on age-appropriate pre-school education" and is an indicator of potential over provision in the local area.

Financial Implications

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

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

Based on the 2023-24 Common Funding Formula (CFF), the difference in Age Weighted Pupil Unit (AWPU) funding between 52 part-time pupils and 26 full-time pupils in the nursery unit is detailed in the Table 1 below:

Table 1

	AWPU funding for two part-time classes (52 pupils)	AWPU funding for one full-time class (26 pupils)	Variance in funding
	£'000	£'000	£'000
Nursery Unit	110	83	27

Whilst the school would have fewer pupils and therefore should experience a reduction in some costs (such as consumable educational resources for pupils), it is likely that most costs, particularly in regard to staffing, accommodation and utilities, are unlikely to change significantly in the short term. That is, in the short term, the reduction in costs is unlikely to be at the same level as the reduction in AWPU funding set out at Table 1 and this could lead to some short-term pressures, despite the assertions of Boards of Governors, and could impact on the financial position of the school. However, given the pattern of enrolment of penultimate aged pupils in the school and the Department's intention to legislate to remove such pupils from funded pre-school provision, it is unlikely that the current provision would be financially sustainable in the longer term. The school's provisional deficit position as at 31 March 2023 is -£141,202.

There is likely to be a small increase in demand on the budget in relation to pupils entitled to Free School meals. This is because school meals are not available in part-time pre-school provision but are available in full-time provision. However, given the small numbers involved (26 new full-time places) and an average of 40%⁵ pre-school pupils uptake of free school meals), the level of additional demand, at circa 11 additional children if the proposed change is approved is not considered to be a major impediment in the overall context of School Meal provision.

Sustainability assessment

⁵ Based on Nursery School FSM data: [School Meals Tables for 2022_23.xlsx \(live.com\)](#)

Schools for the Future: A Policy for Sustainable Schools (SSP) does not apply to pre-school provision therefore no sustainability assessment is required.

Below are some key points in relation to the Portavogie PS NU.

- The school has had between 2 and 9 vacant pre-school places the last five years.
- The school has also enrolled penultimate pre-school aged pupils in each of the last five academic years for which census data is available. The number of penultimate aged pupils enrolled in each of the last five years from 2018/19 to 2022/23 were 7; 10; 18; 24; and 13 respectively.
- The Board of Governors has confirmed that the school has adequate accommodation and no capital or other investment is required to facilitate the proposed change.
- The proposed change would see a reduction in the CFF allocation to the school. The Board of Governors has confirmed that it considers this change is sustainable.
- The provisional position for the school, as of 31 March 2023, is a Deficit of - £141,202.

The Education and Training Inspectorate (ETI) last published an inspection of the school on 27 June 2019. No more recent published ETI assessment of provision at the setting is available at this time.

Consultation

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

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

Officials have examined all evidence and information received, and while there have been some comments made in regard to the desire of other settings to be considered for a similar opportunity through the pilot, no substantive objections to the proposal were received. One response was received from a pre-school in the vicinity Portavogie PS NU, namely Kircubbin Community Nursery School which was in support of the change.

On the whole all of the sectoral bodies consulted were supportive of the pilot and the proposals for standardisation. There were some initial concerns raised over the timing of the pilot and the speed at which it was being implemented, resulting in the

schools being invited to participate last year having limited time to consider the full ramifications of the proposed changes to their setting. NICIE and CnaG also raised some concerns about the potential impact on other integrated or Irish Medium settings in the areas of the schools invited to participate but have not raised any concerns in relation to any particular school, including this one.

Further details of each of the initial responses received from sectoral bodies and other pre-school settings in the area, together with any further responses in relation to the on-going pilot are attached at **Tab D**.

Rationale for change

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

- Portavogie PS NU is a good existing provider of pre-school education in the area.
- The school has enrolled at least 15 penultimate aged pupils in at least 3 of the last 5 academic years.
- NISRA statistics indicate a reduction in the birth rate in the area in between 2022 and 2035.
- The Board of Governors have advised that a change to the enrolment figures for the school as requested would be in the best interests of pre-school children in the area and is achievable within existing provision.
- The Board of Governors have advised that the proposed change is sustainable.
- The EA has advised that the proposed change can be implemented while continuing to ensure there is sufficient provision in the area to provide a funded pre-school place for every target aged child whose parents want it and this is supported by the enrolment and NISRA data as set out within this advice.
- Implementation of the proposed change would contribute towards the overarching aim of a standardised session length for all pre-school pupils.

Method of approval

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

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

- i. to establish a new grant-aided school;
- ii. to amend the status of an existing grant-aided school;

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

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

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

Recommendation

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

- (i) Agree that the proposed change is suitable to be considered under the 'Amalgamation for Standardisation' pilot and processed under Articles 25 and Article 29 of the Education (NI) Order 1998; and
- (ii) Approve the proposal under the terms of the Amalgamation for Standardisation pilot that: **"THE EXISTING STATUTORY NURSERY PROVISION AT PORTAVOGIE PRIMARY SCHOOL AND NURSERY UNIT [DE REF 401-1507] WILL BE MODIFIED TO PROVIDE 26 FULL-TIME NURSERY PLACES ONLY WITH EFFECT FROM 1 SEPTEMBER 2024 OR AS SOON AS POSSIBLE THEREAFTER."**; and
- (iii) Agree that this advice (with appropriate redactions) will be published on the Department's website once the EA and the school have been informed of your decision.

Enrolment Data

Portavogie PS NU (DE ref 401-1507)

	Academic Year					
Academic year	22-23	21-22	20-21	19-20	18-19	17-18
Penultimate pupils	13	24	18	10	7	26
Total pupils	48	50	47	52	52	52

Source: DE census

Portavogie PSNU: Key data

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

For the 2023-24 academic year:

- significant decline in live births for Northern Ireland by 695 children
- Ten of the eleven District Council areas will have in excess of 100 % preschool provision (based on current provision). (See Table 1)

For the 2024-25 academic year:

- A further decline of 512 target aged children.
- Seven of the eleven District Council areas in excess of 100 % pre-school provision. (See Table 2)

Table 1

Births by Academic Year	PRE-SCHOOL 2023		
	Live Births 2019	Increase/Decrease on live births on Previous Year	% Pre-school Provision for Sept 2023
LGD2014			
Antrim & Newtownabbey	1636	-1	100.06%
Ards & North Down	1493	-56	103.75%
Armagh City, Banbridge & Craigavon	2678	-93	103.70%
Belfast	4082	-156	103.82%
Causeway Coast & Glens	1504	-54	103.59%
Derry City & Strabane	1822	-63	103.46%
Fermanagh & Omagh	1398	-15	101.07%
Lisburn & Castlereagh	1703	-69	104.05%
Mid & East Antrim	1398	-33	102.36%
Newry, Mourne & Down	2209	-176	107.70%

Source: NISRA Demographic Statistics

Table 2

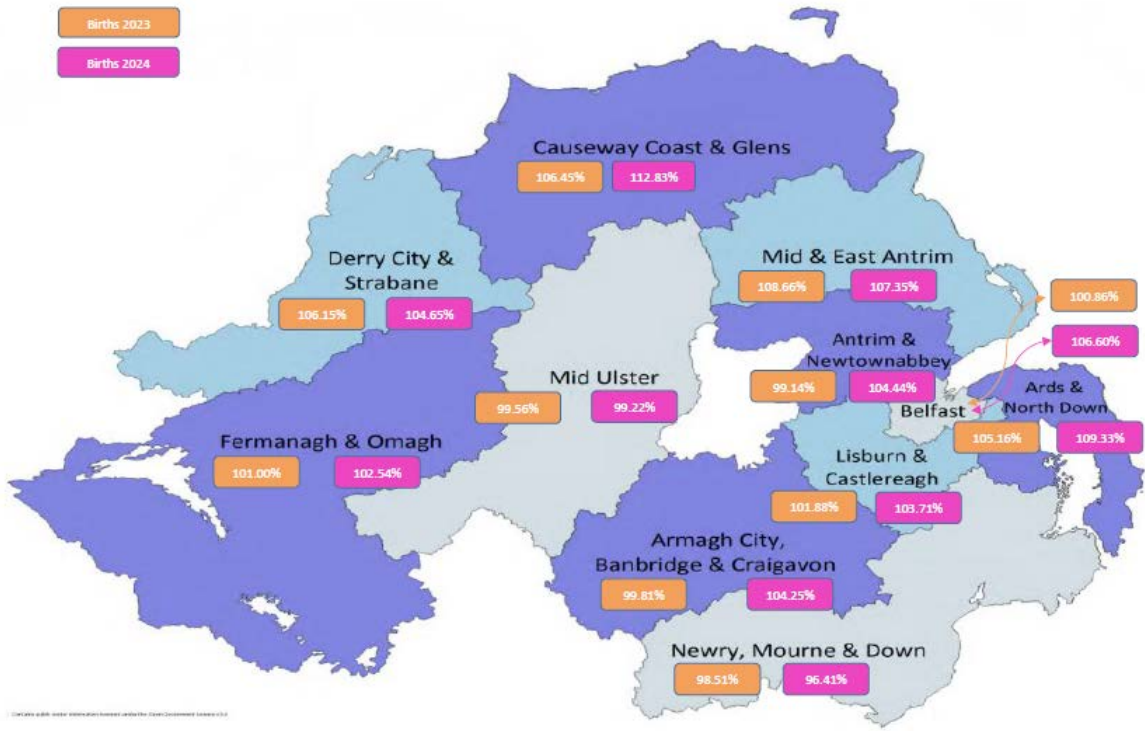
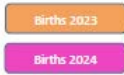
Births by Academic Year	PRE-SCHOOL 2024		
	Live Births 2020	Increase/Decrease on live births on Previous Year	% Pre-school Provision for Sept 2024
LGD2014			
Antrim & Newtownabbey	1553	-83	105.34%
Ards & North Down	1436	-57	103.97%
Armagh City, Banbridge & Craigavon	2564	-114	104.45%
Belfast	3862	-220	105.70%
Causeway Coast & Glens	1419	-85	105.99%
Fermanagh & Omagh	1377	-21	101.53%
Lisburn & Castlereagh	1673	-30	101.79%

Source: NISRA Demographic Statistics

Current NISRA population projections for Ards & North Down LGD of children aged 3 years:

2018	2019	2020	2021	2022	2023	2024	2025	2026
1777	1868	1716	1608	1621	1636	1619	1600	1585
2027	2028	2029	2030	2031	2032	2033	2034	2035
1573	1560	1548	1535	1523	1513	1505	1497	1493

PROJECTED LIVE BIRTH vs EXISTING PRE-SCHOOL



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Funded pre-school settings within 5 miles*
(Statutory settings highlighted in yellow)

4011507	Portavogie PSNU
4136626	Kircubbin Community Nursery School

*As per DE mapping system.

Consultation

Summary of Responses from Sectoral Bodies

Education Authority response received 5 December 2022

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

Further response received from the EA on 13 October 2023

- Portavogie PS NU has the capacity to accept 52 children each academic year, based on 2023-24 data and statistics they received 21 1st preference pre-school applications and have also accepted 16 penultimate aged children. This shows that there are still 15 places available in the setting.
- Within a 5-mile radius of Portavogie PS NU, there are 2 pre-school settings and there were 60 1st preference applications for a total of 104 available places, there is also a further 16 places available through temporary flexibility and increasing the pupil allocation number for PSEP settings.
- The above information is demonstrating a c173.33% over provision in the area for 2023-24.
- If Portavogie PS NU, go from 2 part-time to 1 full-time unit then a reduction in 26 pre-school places, the level of provision would be 130% and there will still be sufficient capacity within the area.
- The live birth rate for the Portavogie area shows a decrease from 33 for 2023-24 down to 32 for 2024-25.

CCMS response received 24 November 2022

- Move to full-time excellent step forward.

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

Further response received from CCMS on 20 October 2023

- CCMS recognises the positives in moving to full-time provision across the Nursery Sector and would support the request to change under the pre-school pilot by the three schools mentioned in your letter of 16.10.23. We would wish to ensure that there will be no displacement of appropriate aged children in those areas.
- We recognise that this is a movement from 52 part time places to 26 full time places and will therefore negate the provision of places for underage children.
- However, we also recognise that there is a need in the system for provision of childcare placements for these children to ensure their social, emotional and educational development. We acknowledge that there is no additional money and schools accept the implications for them and understand what those are.
- The mechanism that this standardisation pilot is aiming to put in place to move the process away from lengthy Development Proposals is to be welcomed and hopefully it will prove more beneficial to our Nursery units and schools in the future.

CSSC response received 10 November 2022

- CSSC notes the potential for this pilot to partly address the number of penultimate age children in the system but is conscious that to achieve full standardisation across the Pre-school Education Programme will require significant resources and the pace of change will be slow and will take a considerable period of time.
- While the pilot presents many opportunities the move is certainly not without its challenges for the sector.
- The timing of the pilot has surprised controlled schools.
- To consider the implications for each setting is a considerable task, which requires the support of governors, and scheduling meetings to ensure that the implications

of amalgamation are explored and understood by all. The preparation of a considered response by 11 November 2022 to this unexpected pilot has been communicated by some schools as a particular challenge.

- Controlled schools also highlighted the difficulties in giving due consideration to participation in the pilot when the expectation is that settings will submit admissions criteria to the Education Authority by 16 November 2022.
- CSSC had anticipated a survey assessing the readiness of the sector ahead of any actual move to standardisation and had expected the survey to issue this Autumn. CSSC had no prior knowledge of the intention to progress a pilot.
- CSSC anticipates and hopes that the scoping survey which DE will progress will better inform progress towards standardisation for all settings and that there will be learning from the arrangements for and implementation of this pilot.
- CSSC welcomes the Department's intention to engage directly with schools to consider the implications for each individual setting in terms of budget, staffing, accommodation and other relevant issues.
- While CSSC understands the criteria used to decide on the 12 schools invited to participate in the pilot, CSSC believes that a scoping survey of school readiness would have provided DE with more detailed information which could have led to the identification of a cohort of schools better placed to implement the amalgamation of part-time classes.
- CSSC is aware of settings which are enthusiastic about the pilot but will be unable to progress to implementing the pilot aims because of capital investment requirements.
- While CSSC notes and understands the current economic context and the pressures on the education budget it is nevertheless disappointing that settings' participation in the pilot cannot be facilitated through some investment.
- CSSC notes concerns that the amalgamation of part-time classes to full-time will lead to a reduction in the AWPU for participating schools and that this will potentially have implications for staffing.
- CSSC has expressed concerns about controlled schools being invited to participate in the pilot in areas for which new pre-school provision is proposed as outlined in Operational Plan 1.
- CSSC confirms its support for the standardisation of pre-school session times to 4.5 hours based on research which demonstrates the positive impact of full-time provision on the personal development and educational outcomes of children in the early years.
- CSSC welcomes the intention to progress a scoping survey (in December 2022/January 2023) which will assess the readiness of the wider sector to move to full-time provision and which will support DE in engaging with the sector to inform the move to ensuring full-time provision for all during their pre-school year.

Further response received from CSSC 13 October 2023

- CSSC welcomes the opportunity to provide further comment on the Department's pilot programme to effect the standardisation of pre-school session times.
- CSSC is conscious that of the three settings which have been able to participate in the pilot programme for 2023/24, two of those settings are controlled settings.

- CSSC is encouraged by the positive experience of the pilot programme for those two settings, The Academy Nursery School and Belmont Nursery School, which reported benefits for staff and pupils.
 - CSSC is conscious, however, that standardisation was facilitated in both settings because no capital investment was required (a key criteria for participation) and both settings operated a mixed pattern of provision and therefore had accommodation that was able to meet the demands of an extended school day, specifically the need to provide school lunches.
 - Engagement with other controlled settings confirms that the concerns raised by CSSC in our initial response regarding the pilot programme persist and include, but are not limited to, concerns around the absence of capital investment and the impact of reduced funding.
 - It is crucial that settings are supported to consider the implications of participation in the programme at every level and this includes support to assess the implications for the school's budget of a reduced AWPU for participating schools.
- Unintended consequences of the pilot programme.

The communication of the pilot programme to local private/voluntary pre-school providers, naming the statutory providers invited to participate in the pilot programme, had the unintended consequence of reportedly causing private/voluntary providers in two areas to consider actions to mitigate the potential loss of pupils to the statutory providers.

Expanding the pilot programme informed by survey responses of all PSEP providers.

- CSSC acknowledges the significant contribution that this pilot programme will make to informing the roll out of standardised pre-school session lengths for all providers.
- CSSC is conscious that a number of Development Proposals to establish or expand pre-school provision have been published since the commencement of the pilot programme.
- In this context, CSSC recommends that proposals which will impact upon future pre-school provision should not be progressed until the outcomes of the pilot programme are determined and a strategy is agreed which will realise the aspiration for all our children to access a full-time pre-school education, regardless of the type of setting they attend.
- Currently those settings unable to progress due to capital investment considerations are discouraged by the barriers to their participation in the pilot programme and doubt the ability of the system to support widespread standardisation if the minor investment required by their settings cannot be supported.

CnaG response received 28 November 2022

- To ensure maximum exposure to the 'target' language and in line with best practice in immersion methodology, a sufficient period of time in an Irish immersion early years context is essential.
- This ensures a solid linguistic foundation from which children will continue on their Irish immersion journey.

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

Further response received from CnaG 23 October 2023

- CnaG has a nil return in relation to these two additional schools as our views have already been articulated in the previous consultation and still stand.

NICIE response received 11 December 2022

- Overall, NICIE welcomes this Circular and Pilot as we have highlighted the issue of underage children in a paper in 2019.
- Of the 12 pilot schools mentioned, the presence of large numbers of underage children in seven of these settings has impacted upon recent and planned Development Proposals for Nursery Units in neighbouring Integrated Primary Schools.
- In all, six GMI and CI schools either have been affected or stand to be impacted by this issue in seven of the pilot schools.
- NICIE would contend that the removal of places from Nursery Units and Schools which have not been to fill them with target age children makes sense for the children, as the Curriculum is not appropriate.
- We would be concerned that as this is a voluntary process and may not deliver the expected reduction in places in these settings, and that this may in turn act as

a barrier against the development of sustainable Integrated schools in these areas.

- NICIE would ask that the demand assessment contained in Article 5 of the Integrated Education Act 2022 which has now come into force is adhered to.
- Considering this change in the law NICIE would expect to see places allocated to the Integrated pre-school settings being commensurate with the demand for those places and not reduced because of undersubscribed settings in other school sectors.

Further response received from NICIE 13 October 2023

- Thank you for the opportunity to respond to the Amalgamation for Standardisation Pilot Programme letter dated 3 October 2023.
- As previously stated in our response in November 2022, NICIE welcomes this pilot programme.
- There are no Integrated primary schools in Portavogie, with the nearest ones being in Kircubbin and Portaferry IPSs.
- Kircubbin does not have preschool provision but Portaferry has a Playgroup on site which lost its PEG funded places in an attempt to support the Nursery Unit in St Mary's PS, Portaferry. The Playgroup is now dependent on Pathway funding.
- Again the religious mixing that the label non-sectoral should imply, has not happened as the number of Catholics in the 52 place setting in Portavogie PS has been zero or four or less over the years 2014/15 to 2021/22.
- This is disappointing as sadly the reverse could be said of St Mary's in Portaferry where few or no Protestants attend.
- Overall, for the same reasons as for St Joseph's Crumlin, NICIE is in favour of the amalgamation of Portavogie and would hope that in time this would be supportive of both the Playgroup provision and the Integrated Primary school at Portaferry PS.
- The school displays a good religious balance and along with Kircubbin IPS is one of the few in the area to do so.
- Considering the change that the Integrated Education Act 2022 has brought about concerning demand NICIE would expect to see places allocated to the Integrated preschool settings being commensurate with the demand for those places and not reduced because of undersubscribed settings in other school sectors.
- NICIE hopes that the Department will take into consideration these comments on the pilot and the implications for Integrated schools.

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

- I feel the change in numbers and session will not have too much an impact on our setting here.
- We rarely have children from the Portavogie area as they stay in their catchment area.

- I have no issues with Portavogie Nursery going to one class full-time.
- I can see no reason why it shouldn't go ahead.
- I am very much in favour of full-time sessions.