

**COPY OF DEVELOPMENT PROPOSAL SUBMISSION**

**Cover Note**

<b>DP No.</b>	563 (Armagh, Banbridge & Craigavon)
<b>School(s)</b>	Bridge Integrated Primary School
<b>Proposal</b>	<b><i>A single pre-school nursery unit will be established at Bridge IPS to provide 26 part-time nursery places with effect from 1 September 2019, or as soon as possible thereafter.</i></b>
<b>Permanent Secretary's Decision</b>	Not Approve
<b>Date of Decision</b>	03/07/2019
<b>Permanent Secretary's Comments</b>	<p><i>This is yet another Development Proposal on which there is a conflicted evidence base. The host school, Bridge Integrated Primary School, is clearly a sustainable and popular school, and there is evidence of parental demand for pre-school provision at a school of an integrated management type. The statutory duty placed on the Department to encourage and facilitate integrated education, coupled with the Department's advice to the Education Authority about the implications of this statutory duty in respect of pre-school education, are relevant in this regard, and I have reflected on them carefully.</i></p> <p><i>However, all the analysis suggests that there is no requirement to increase the level of pre-school provision in the area. Indeed, the submission highlights that to do so would risk displacing existing good pre-school provision and potentially undermine the position of existing providers. Against that backdrop, the estimated capital and resource costs of the proposal are not insignificant, particularly when considered against my duty to ensure effective and efficient use of public funds and the very significant unfunded, and unavoidable, pressures in the education budget.</i></p> <p><i>Having considered all the duties to which I am required to have regard, I have concluded that as Accounting Officer for the Department's budget, which is already over-committed this year and under serious pressure, I cannot accept the recommendation at paragraph 173 of the submission.</i></p> <p><i>The Development Proposal is not approved.</i></p>

<b>Additional notes</b>									
<b>Information redacted</b>	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.								
	<table border="1"> <thead> <tr> <th>Key</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>■</td> <td>redaction</td> </tr> <tr> <td>*</td> <td>refers to less than five cases where data is considered sensitive</td> </tr> <tr> <td>#</td> <td>means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure</td> </tr> </tbody> </table>	Key	Details	■	redaction	*	refers to less than five cases where data is considered sensitive	#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure
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#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure								

From: Bill Stevenson  
Area Planning Policy Team

Date: 14 May 2019

To: Derek Baker  
Permanent Secretary

Copy distribution below

**DEVELOPMENT PROPOSAL (DP) 563 – BRIDGE INTEGRATED PRIMARY SCHOOL (IPS), BANBRIDGE ESTABLISHMENT OF A NURSERY UNIT**

<p><b>Issue:</b></p>	<p>To decide on DP 563:</p> <p><i>A single pre-school nursery unit will be established at Bridge IPS to provide 26 part-time nursery places with effect from 1 September 2019, or as soon as possible thereafter.</i></p>
<p><b>Timescale:</b></p>	<p>Routine - on the basis that it is not considered practical for the DP to be implemented by September 2019 if approved, hence a modification is proposed for September 2020 implementation if approved.</p>
<p><b>Financial / Resource Implications:</b></p>	<p><u>Capital</u> Should DP 563 be approved, a modular classroom and toilets plus site works would be required estimated at £300,000.</p> <p><u>Resource</u> If approved there would be an additional pressure on the Aggregated Schools Budget (ASB). In Year cost: estimated at £32k, charged against the Department’s ‘New Schools &amp; Units’ fund. Full Year cost: estimated at £55k, charged against the ASB. One part-time teacher and classroom assistant plus cleaning provision and administration costs would be required which the Case for Change estimates at £48,000, charged against the school’s delegated budget.</p>
<p><b>FOI Implications:</b></p>	<p>The content of this submission is likely to be fully disclosable.</p>

<b>Statutory Duty Implications:</b>	<p><b>Article 64 of the Education Reform (NI) Order 1989</b></p> <p><b>Article 44 of the Education and Libraries (NI) Order 1986</b></p> <p><b>The Rural Needs Act (NI) 2016</b></p> <p><b>The Shared Education Act (NI) 2016</b></p>
<b>Presentational Issues:</b>	<p><b>It is likely that there will be local media interest in your decision. If approached, the Press Office can draw from this submission and liaise with officials. (Cleared with Press Office.)</b></p>
<b>Recommendation:</b>	<p><b>It is recommended that you:</b></p> <ul style="list-style-type: none"> <li><b>i. Approve DP 563 <u>with a modification</u> to the implementation date as follows:</b></li> </ul> <p><i>A single pre-school nursery unit will be established at Bridge IPS to provide 26 part-time nursery places with effect from 1 September <u>2020</u>, or as soon as possible thereafter.</i></p> <ul style="list-style-type: none"> <li><b>ii. Agree that this submission (with any appropriate redactions) can be published on the Department’s website once the school and the Education Authority (EA) have been informed of your decision.</b></li> </ul>

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### **Appendices**

**Appendix A: Published Development Proposal**

**Appendix B: Case for Change**

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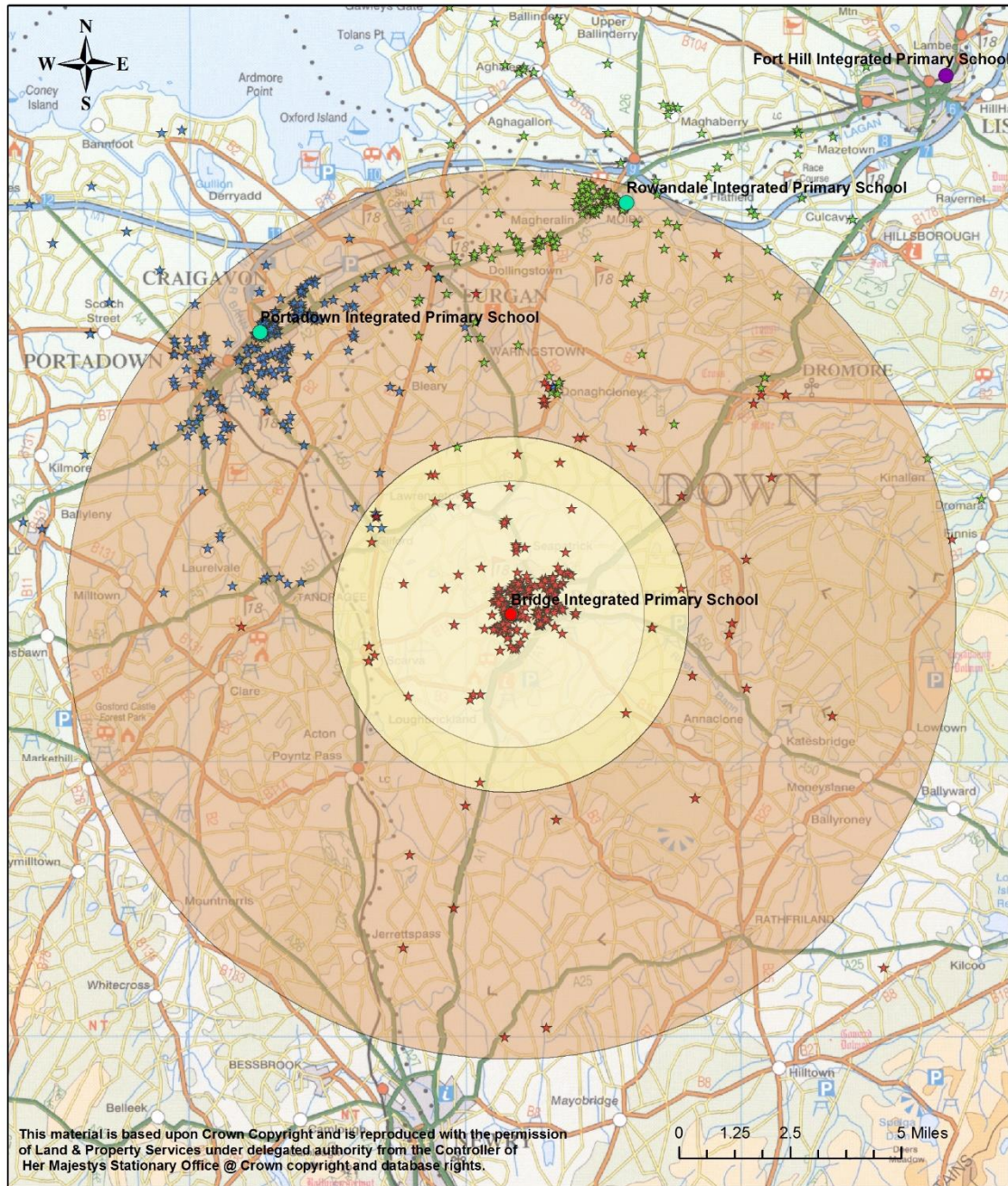
(i) **Northern Ireland Council for Integrated Education (NICIE) Commentary**

(ii) **Controlled Schools' Support Council (CSSC) Comments**

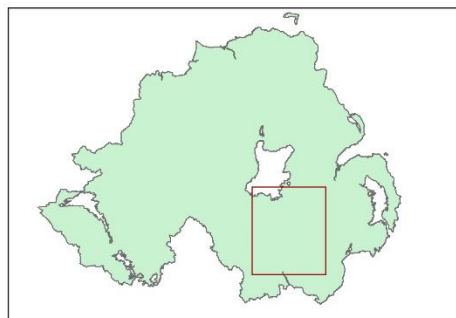
(iii) **Banbridge Nursery School response**

**Appendix E: Department of Education (Policy Team) Comments**

Bridge Integrated PS - Alternative Integrated Provision / Pupil locations



- Bridge Integrated PS
- Controlled Integrated Primary
- Grant Maintained Primary
- ★ Bridge IPS pupils
- ★ Portadown IPS pupils
- ★ Rowandale IPS pupils
- 3 Mile buffer of Bridge IPS
- 4 Mile buffer of Bridge IPS
- 10 Mile buffer of Bridge IPS

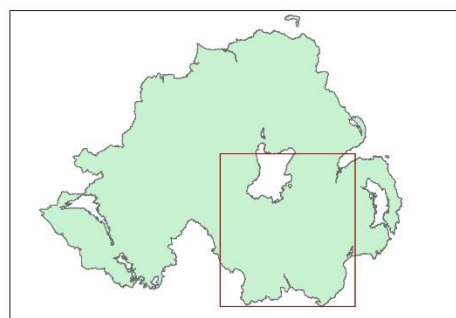




Bridge Integrated PS -Alternative Integrated Provision

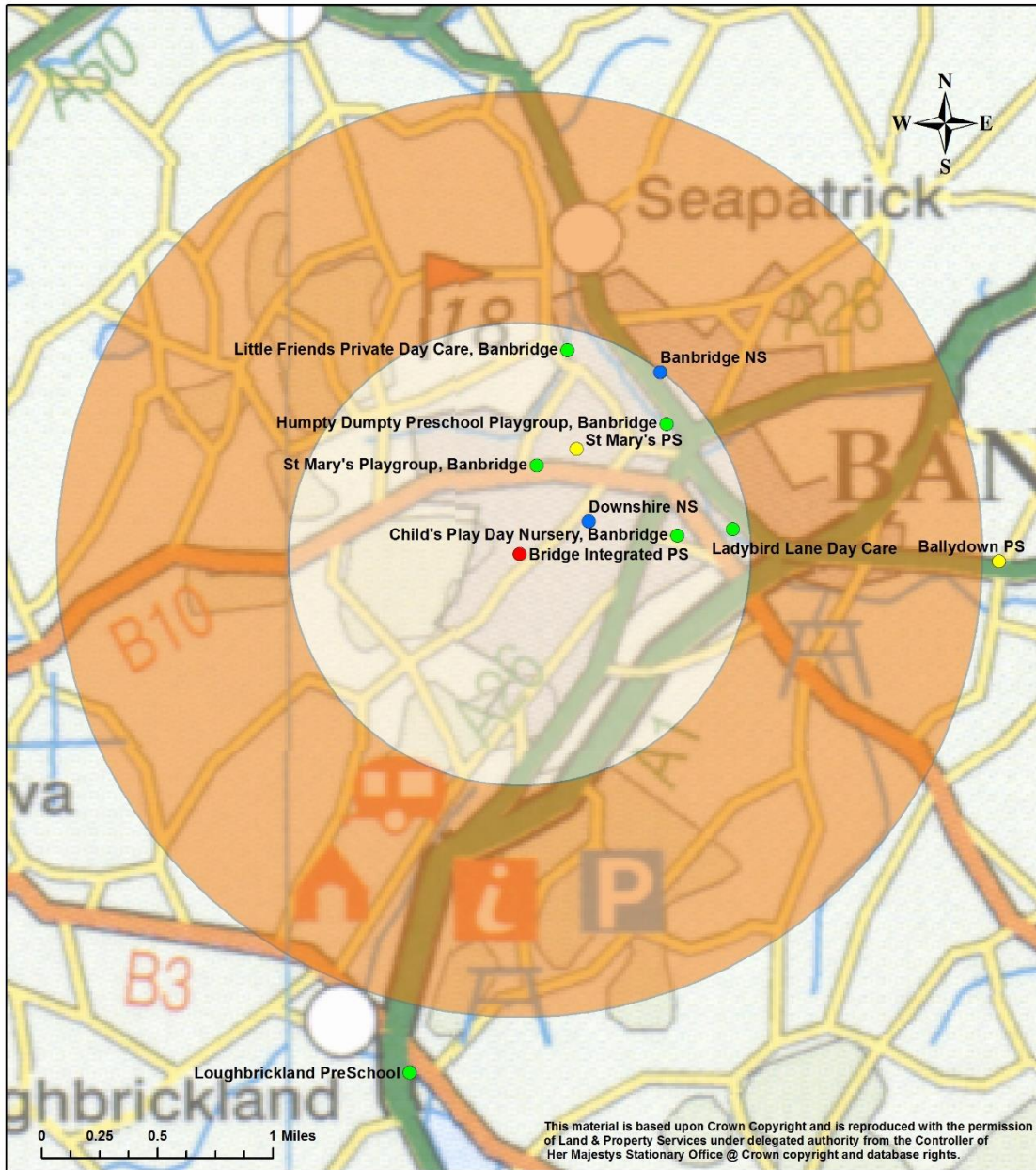


- Bridge Integrated PS
- Controlled Integrated Primary
- Grant Maintained Primary
- 18 Mile Buffer of Bridge Int PS

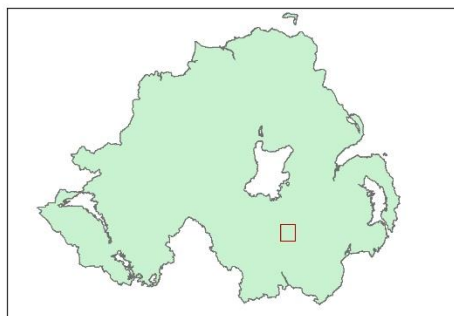




Bridge Integrated PS - Pre-school and Nursery Provision (2 mile radius)

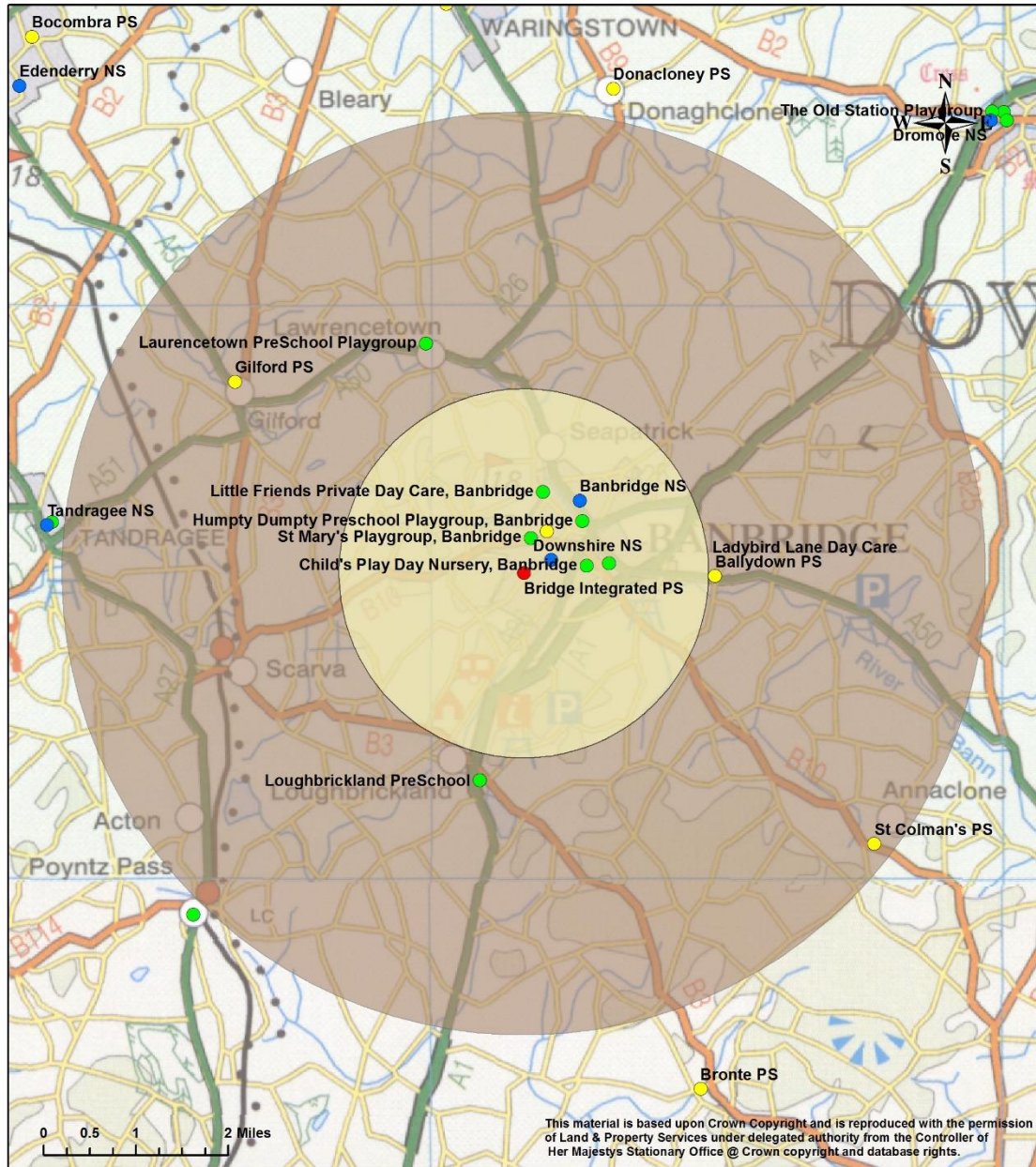


- Bridge Integrated PS
  - Primary Schools with Nursery Units
  - Nursery Schools
  - Voluntary and Private Pre-schools
- Buffer distance in miles**
- 0.00 - 1.00
  - 1.00 - 2.00

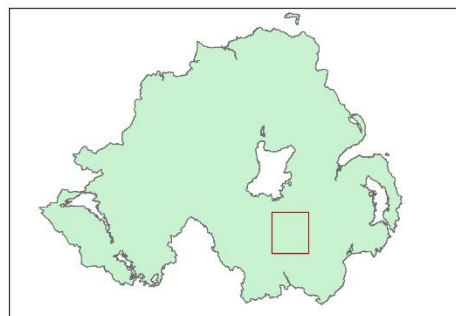




Bridge Integrated PS - Pre-school and Nursery Provision (5 mile radius)

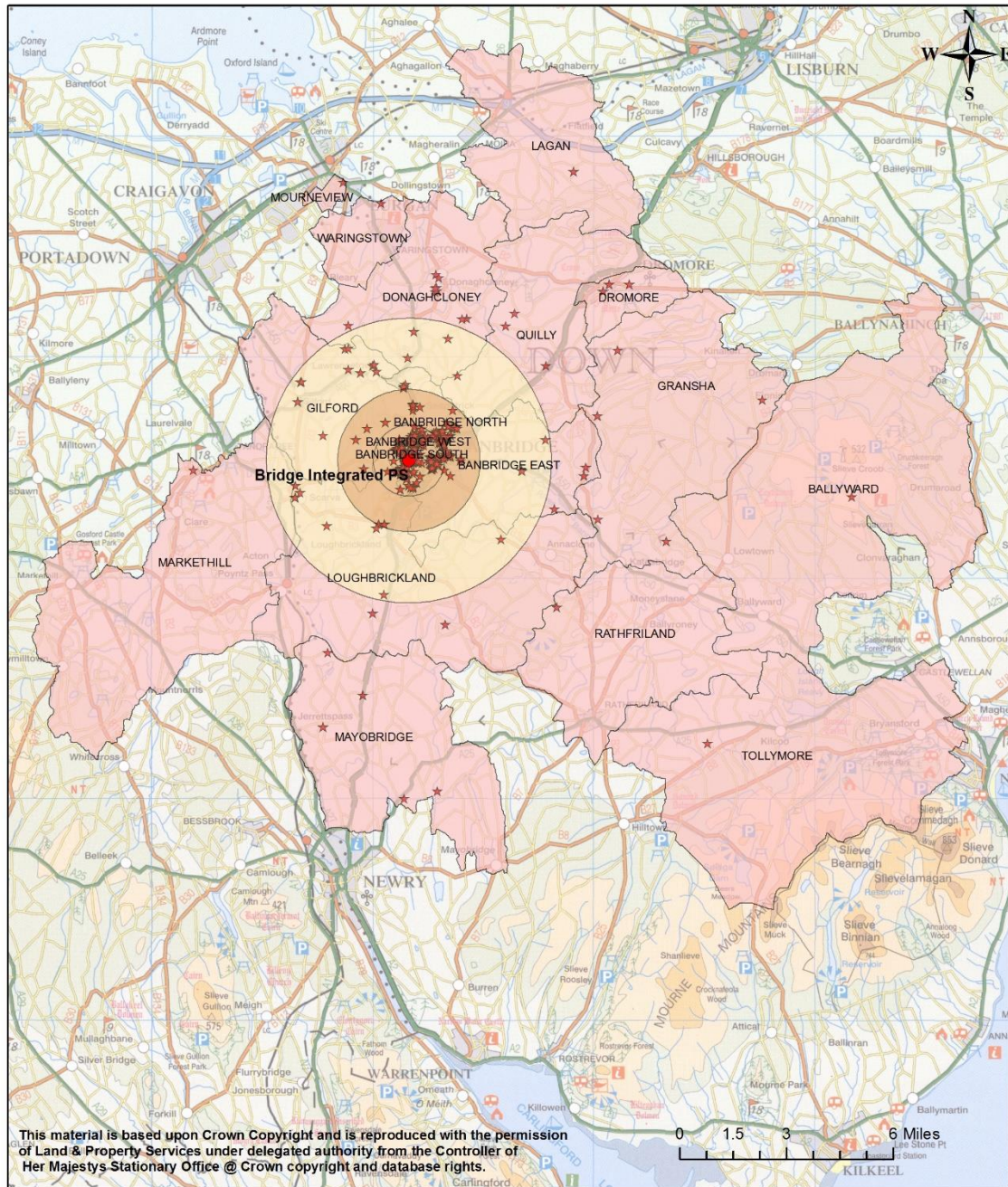


- Bridge Integrated PS
- Primary Schools with Nursery Units
- Nursery Schools
- Voluntary and Private Pre-schools
- 2 Mile Buffer of Bridge IPS
- 5 Mile Buffer of Bridge IPS

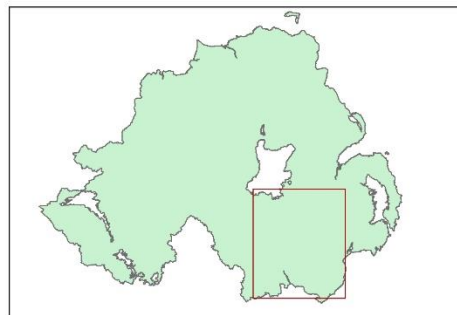




Bridge Integrated PS - Pupil locations by ward



- Bridge IPS
- ★ Bridge IPS pupils
- 2 Mile Buffer of Bridge IPS
- 5 Mile Buffer of Bridge IPS
- OSNI Wards



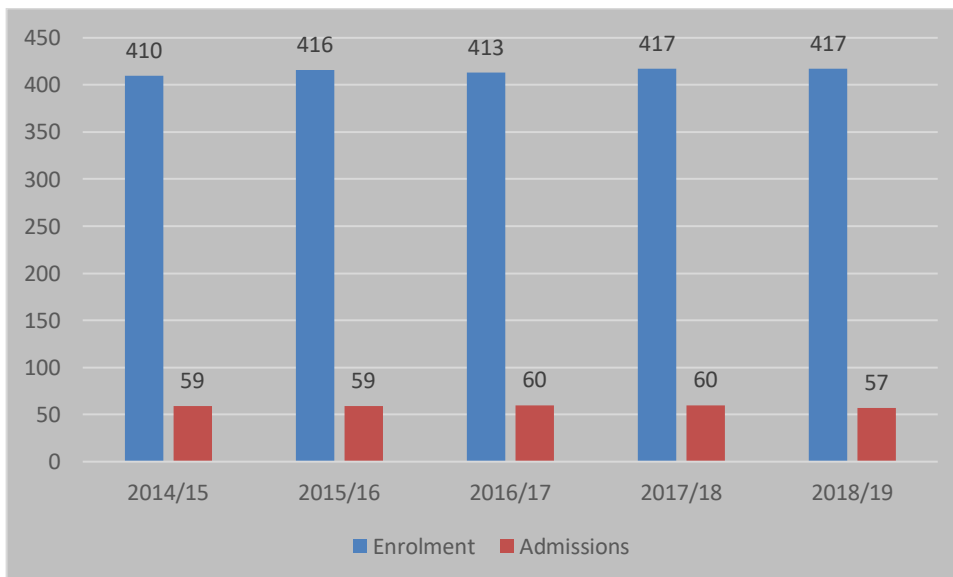
## INTRODUCTION

1. On 18 September 2018 the Education Authority (EA) published DP 563 on behalf of the Board of Governors (BoG) of Bridge IPS, Banbridge. The proposal aims to establish a single pre-school nursery unit (NU) to provide 26 part-time nursery places with effect from 1 September 2019, or as soon as possible thereafter.
2. The statutory two month objection period ended on 19 November 2018. Copies of the published DP and the proposer's Case for Change are reproduced at Appendices A and B respectively.

## BACKGROUND

3. Bridge IPS is a co-educational Grant-maintained Integrated (GMI) primary school located on the Ballygowan Road in Banbridge. Map 1 shows the location of Bridge IPS and the nearest alternative integrated provision.
4. The approved admissions and enrolment numbers for Bridge IPS are 58 and 406 respectively. In 2018/19 the school's enrolment is 417, including 13 pupils with a statement of Special Educational Needs and 57 Year 1 pupils. Chart 1 sets out the school's historical admissions and enrolment numbers for the last five years showing that its enrolment has remained steady and has been consistently well above the Sustainable Schools Policy's (SSP) recommended minimum enrolment of 105 for a sustainable rural primary school.

**Chart 1: Bridge IPS – Historical Admissions and Enrolments**



5. In 2018/19, 100 (24%) of the school's pupils are entitled to Free School Meals.

## Area Context

6. On the Northern Ireland Multiple Deprivation Measure 2017 the Fort Super Output Area (within which the school is situated), is placed 503 out of 890 (1 being most deprived and 890 least deprived).

## NISRA Local Birth Rates and Population Projections

7. The NI Statistics and Research Agency (NISRA) local birth rates and population projections provide information on potential future population trends in the area.

- Birth statistics by academic year for all wards which fall at least partially within a five mile radius of Bridge IPS indicate a decrease of 37 in the pre-school cohort between September 2018 admissions and September 2020 admissions (838 to 801). However, statistics show an increase in births in the pre-school cohort for September 2019 admissions with 853 live births in 2015.
- Population projections for three year olds for Armagh, Banbridge and Craigavon council areas predict a decrease of 106 (3.5%) from 3,034 to 2,928 between 2018 and 2031, and an increase of 201 (6.4%) from 2,932 to 3,133 between 2032 and 2041.

8. These figures suggest that demand is likely to slightly decrease in the medium 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.

## EA's "Providing Pathways" Strategic Area Plan for School Provision 2017-2020

9. The EA's Strategic Area Plan 2017 – 2020 (the Area Plan) identifies a number of key emerging issues from analysis of current provision in the Armagh Banbridge and Craigavon Local Government District (LGD) area. An issue relevant to Bridge IPS is the potential for Irish-medium and Integrated school development.

10. The Area Plan states that the population within the age range of 0-15 years in the Armagh, Banbridge and Craigavon LGD is projected to increase by 9.6% by 2024.

11. This DP was included in the EA's Action Plan for April 2015 to March 2017 in which it stated: "*the Managing Authority wishes to establish a nursery unit*" and "*the Managing Authority to consult on options for the future pre-school provision at Bridge IPS by March 2017*".

12. A DP to establish part-time nursery provision at Bridge IPS (DP 487) was previously published on 3 January 2017 but was not approved on 6 June 2017.

## Alternative Integrated Education Provision

13. Map 1 illustrates that the nearest alternative integrated primary provision to Bridge IPS is Portadown IPS and Rowandale IPS, Moira. Map 1 also plots the pupil locations of all three schools which indicates that although they appear to serve distinct catchment areas, there are pockets of overlap at Dromore, Tandragee, Gilford, Laurencetown, Donacloney and Lurgan.



## Portadown IPS

14. Portadown IPS is the nearest alternative integrated primary school at 11.5 miles away by road and the only integrated primary school in the Craigavon, Portadown and Lurgan area. In 2018/19 Portadown IPS admitted 59 Year 1 pupils with an overall enrolment of 361 pupils. Table 1 shows that the school's enrolment number has steadily increased in the last five years although this includes pupils with a statement of special educational needs.

**Table 1: Portadown IPS - Historical Admissions and Enrolments**

<b>Year</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>
<b>Admissions</b>	43	62	61	57	59
<b>Enrolments</b>	235	277	306	331	361

15. Portadown IPS' enrolment is currently in a state of growth following approval of a modified DP (324) on 3 December 2015 to increase admissions from 29 to 58 from 1 September 2016, increasing to a final overall enrolment number of 406, on a phased basis. Approved admissions and enrolment numbers for 2018/19 are 58 and 353 respectively. The substantial increase in admissions shown in Table 1 for September 2015 was facilitated through the approval of Temporary Variations (TVs).

16. Portadown IPS has two statutory NUs both offering 26 part-time places. Table 2 sets out the historical enrolment numbers for the NUs at Portadown IPS.

**Table 2: Portadown IPS NUs - Historical Enrolments**

<b>Year</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>
<b>Enrolment</b>	54	55	53	52	52

## Rowandale IPS

17. Rowandale IPS is the second closest integrated primary school to Bridge IPS at 12.7 miles away by road.

18. Rowandale IPS' enrolment is also in a state of growth following approval of DP 255 on 13 November 2014 to an admissions number of 57 and an overall enrolment of 399. In 2017/18, however, Rowandale IPS admitted 35 pupils to year one, a significant drop from 57 in 2016/17 and 37 pupils were admitted in 2018/19. Table 3 sets out the school's historical admissions and enrolment numbers including pupils with a statement of special educational needs.

**Table 3 – Rowandale IPS - Historical Admissions and Enrolments**

	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>
<b>Admissions</b>	31	42	57	35	37
<b>Enrolments</b>	197	216	243	256	265

19. Rowandale Community Playgroup was established at the school in September 2012 through support from the Integrated Education Fund. DP 535 to establish a statutory 26 part-time place NU at Rowandale IPS was published on 16 November 2017, with a decision not to approve DP 535 taken on 13 April 2019.

20. The Case for Change also includes Saints and Scholars IPS, Armagh and Windmill IPS, Dungannon as alternative integrated provision to Bridge IPS. Saints and Scholars IPS is 18.4 miles away with Windmill IPS much further afield at 30.2 miles.

### **Alternative Pre-School Provision**

21. Maps 3 and 4 plot the location of each of the alternative statutory and non-statutory pre-school providers within a five mile (mapping) radius of Bridge IPS.

22. There are two statutory nursery schools and one NU all within a two mile radius of Bridge IPS and a further three NUs within a five mile radius. Table 4 details the historic enrolments for statutory provision and shows that all places offer full-time provision and were fully taken up in the last five years.

**Table 4 – Historic Enrolments for Statutory Nursery Provision**

Ref No		Distance in miles by Road*	Approved	2014/15	2015/16	2016/17	2017/18	2018/19
	<b>Nursery School</b>							
511-6256	Downshire NS	0.4	52 f/t	52	52	53	53	52
511-6238	Banbridge NS	1.4	52 f/t	52	52	52	52	53
<b>Total</b>			<b>104</b>	<b>104</b>	<b>104</b>	<b>105</b>	<b>105</b>	<b>105</b>
	<b>Nursery Unit</b>							
503-6043	St Mary's PS, Banbridge	0.7	26 f/t	27	30	30	27	28
501-1617	Ballydown NU	2.6	26 f/t	26	26	26	26	26
503-6061	St Colman's PS and All Saints' Nursery Unit	5.6	26 f/t	29	30	26	26	30
501-1596	Gilford PS NU	5.9	26 f/t	26	27	27	26	26
<b>Total</b>			<b>104</b>	<b>108</b>	<b>113</b>	<b>109</b>	<b>105</b>	<b>110</b>
<b>Grand Total</b>			<b>208</b>	<b>212</b>	<b>217</b>	<b>214</b>	<b>210</b>	<b>215</b>

F/T = Full Time \* Per Google Maps

23. There are five non-statutory pre-schools within a two mile radius and seven altogether within a five mile radius. Table 5 sets out the historical enrolments for the non-statutory pre-school provision and shows that the number of funded places had been

increasing year on year until 2016/17 but dropped from 171 in 2016/17 to 140 for 2017/18 and 146 for 2018/19.

**Table 5 – Historic Enrolments for Non-statutory Pre-School Provision**

Ref No	Pre-School	Postcode and Distance in miles by Road*	2014/15		2015/16		2016/17		2017/18		2018/19	
			T	F	T	F	T	F	T	F	T	F
5CA-0596	Child's Play	0.4	22	10	21	17	19	16	21	16	25	22
5BB-0557	St Mary's Playgroup**	0.6	26	26	26	25	26	26	24	18	-	-
5AB-0466	Humpty Dumpty	1.0	20	20	21	21	19	19	31	17	21	19
5CA-0558	Ladybird Lane	1.5	22	12	22	16	16	16	15	15	22	22
5CA-0559	Little Friends	2.1	39	38	42	42	43	42	34	34	34	34
5AA-0421	Loughbrickland	2.9	26	26	26	26	26	26	23	23	26	26
5AB-0234	Laurencetown	4.4	36	26	38	23	36	26	29	17	23	23
<b>Total</b>			<b>191</b>	<b>158</b>	<b>196</b>	<b>170</b>	<b>185</b>	<b>171</b>	<b>177</b>	<b>140</b>	<b>151</b>	<b>146</b>

F = Funded T = Total \* Per Google Maps \*\* Playgroup withdrew from the PSEP 2018/19

## SPECIAL CONSIDERATIONS

### Statutory Duties

#### Integrated Education

24. There is a statutory duty on the Department under Article 64 of the Education Reform (NI) Order 1989 Order:

*‘.... to encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils.’*

## **Effective and Efficient Use of Public Funds**

25. DE must also be mindful of its duty under Article 44 of the Education and Libraries (NI) Order 1986 and under Managing Public Money to ensure effective and efficient use of public funds.

## **Shared Education**

26. The Shared Education Act (NI) 2016 makes legislative provision in relation to Shared Education. It provides a definition of Shared Education and confers a duty on the Department of Education to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.

27. The Case for Change states that Bridge IPS “*partners in a vibrant and ambitious Shared Education Partnership with St Ronan’s PS in Newry*”.

## **Policy Context - Early Years**

28. The Department aims to ensure that at least one year of pre-school education is available to every family that wants it. The policy position to date is set out in *Learning to Learn – A Framework for Early Years Education and Learning*, published on 7 October 2013. Among its key actions is placing 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. It also aims to remove reception provision.

29. It is the Department’s practice, where possible, not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting. This includes not ceasing funding for an existing Pre-School Education Programme (PSEP) funded playgroup and establishing statutory nursery provision as an alternative.

## **Rural Considerations**

30. Rural proofing has been a requirement for all Government Departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016 the commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016. The Act places a duty on Government Departments to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. It came into operation for Government Departments and District Councils on 1 June 2017 and applies to public authorities from 1 June 2018. Bridge IPS is defined as rural under the SSP.

## **CASE FOR CHANGE**

31. The Case for Change for DP 563 is reproduced in full at Appendix B. It states that Bridge IPS is a popular, over-subscribed school. A summary of the rationale for the proposal as set out in the Case for Change, is as follows:-

- The oversubscription in the area, combined with the fact that much of the provision is in settings which are predominately either Catholic or Protestant, aligned to



- demonstrated parental demand for Bridge IPS, indicates the need for the development of integrated pre-school provision;
- Development of an integrated pre-school unit at Bridge IPS would provide the only integrated setting in the area and make a sustainable school more sustainable into the future;
  - The drive for this development is a direct response to a shortfall of pre-school provision in the area – this is borne out by the 10 children arriving for P1 at Bridge with no pre-school experience;
  - The staff and Governors recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding;
  - Providing a viable alternative for those parents who prefer an integrated education for their children will assist DE in meeting its statutory duty under Article 64 of the Education Reform Order (NI) 1989;
  - Bridge IPS would like to play a role in moving towards a shared future for all;
  - Approval will also increase the potential for shared education links as Bridge IPS already enjoys good working relationships with Downshire NS, Banbridge NS, Edenderry PS, Abercorn PS, St Mary's PS, Newbridge IC, Banbridge HS, Banbridge Academy and St Patrick's College;
  - Recommendation 6 of the Independent Review of Integrated Education stated that where clear demand is demonstrated, integrated pre-school provision should receive funding and additional places even where there are unfilled pre-school places in other providers in the area;
  - The new school site is in an area of mixed housing and would allow parents the choice of a single integrated education from pre-school through primary education; and
  - The proposal would provide access to integrated education from the age of three to 18 years in the Banbridge area

## **STATUTORY DP PROCESSES**

### Pre-publication consultation

32. The Case for Change states that consultation was carried out with the BoG, staff and parents of pupils at Bridge IPS and the EA has provided evidence of consultation with schools likely to be affected by the proposal. A copy of the proposal was issued on 11 June 2018 to 54 local schools, seven nursery schools and 20 pre-school providers. This pre-consultation closed on 9 July 2018 and the EA received five responses in total, two from pre-school providers, two from nursery schools and one from the Controlled Schools Support Council (CSSC).

33. All of the responses were in objection to the proposal citing:
- The increase in provision is not warranted, statistics do not support the increase;
  - In September 2017, no children who remained in the process were unplaced in the Banbridge area;
  - There were 247 applications for September 2018 for 252 places;
  - Displacement of current provision;
  - Nursery education is established as interdenominational;
  - Efficient use of public funds;
  - No change since DP 487 was refused;

- The use of the birth rate for the whole Armagh, Banbridge and Craigavon LGD is too high level for an accurate projection;
- It is not based on evidence of need; and
- It would not enhance shared education in the area due to displacing cross-community provision already in place.

### **Pre-school Education Group (PEG) Comments**

34. The PEG states that it has considered DP 563 in line with guidance<sup>1</sup> provided by DE regarding pre-school education and the statutory duty to encourage and facilitate integrated and Irish-medium education. In this context, PEG supports the DP on the basis of demonstrated parental demand as evidenced by overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 26 place NU would be sustainable.

35. However, the PEG also states that it would have strong concerns in regard to the potential impact of this additional provision, including:-

- Potential displacement of existing funded pre-school provision in the area;
- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds; and
- Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate.

### **EA View**

36. In providing their view of the proposal, the EA notes the guidance provided by the Department and notes the recommendation of the PEG. The EA also notes the terms of the Department's decision not to approve DP 487 in relation to Bridge IPS in June 2017. 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.

37. The EA confirms that the proposal being taken forward by the BoG is in accordance with the EA's Strategic Area Plan and Annual Action Plan for 2018/19. The EA commentary is included in the Case for Change attached at Appendix B.

### **Statutory Two month Objection period**

38. The EA published DP No 563 on 18 September 2018. The statutory two month objection period ended on 19 November 2018. During the two month objection period the Department received two letters of objection to the proposal from the BoG of Banbridge Nursery School and from the Controlled Schools' Support Council (CSSC).

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<sup>1</sup> 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 PEG should play in striving to meet demonstrated parental demand in an area for pre-school education located at integrated primary schools.

39. The BoG of Banbridge Nursery School states that the school, although not formally integrated, is integrated by religion, faith, culture and lifestyle. The BoG asserts that after completion of the admissions process for September 2017, no children who remained in the process were unplaced. They consider that there is a decreasing trend in the area and the opening of another NU is likely to displace current provision and have a detrimental impact on voluntary and private providers. They also consider that there is no demonstrated area need and are concerned that it may not be the best use of Departmental funding, given the serious financial challenges facing education in Northern Ireland.

40. The CSSC advises that consultation with schools in the Controlled sector was carried out in relation to the proposal and the key points made include the following:

- The CSSC welcomed the Department's decision in June 2017 not to approve proposal 487;
- The CSSC recognises the statutory duty placed on the Department to encourage and facilitate the development of integrated education and that this must be balanced against Article 44 of the Education and Libraries (NI) Order 1986;
- The CSSC has grave concerns at the resource implications of this proposal;
- Recommendation 6 of the Independent Review of Integrated Education that an integrated nursery or any pre-school linked directly to an integrated primary school should receive funding and additional places even where there are unfilled places in other providers in the area is considered untenable in the current economic climate;
- The Council has concerns in respect of what is considered to be sufficiently robust and verifiable evidence of high levels of demonstrated parental demand for integrated pre-school provision;
- The CSSC notes the strong concerns expressed by the PEG in regard to potential displacement – there are nine pre-school providers within a three mile radius of Bridge IPS and their intakes would most likely be affected;
- The CSSC recognises that the proposal also has the potential to displace the intake of pupils transitioning from pre-school to P1 – enhancing the sustainability of Bridge IPS yet jeopardising the sustainability of neighbouring schools;
- Dromore Nursery School accepted 13 younger children in 2017/18 thereby demonstrating that there is no need for additional pre-school provision in this area;
- The Case for Change highlights a shortfall of places at first preference, however, no family is assured of their first preference;
- Ten of the 60 P1 intake to Bridge IPS had no pre-school experience – CSSC would emphasise that parents are free to choose whether to avail of pre-school education for their child/children or not;
- In 2018/19, 247 first preference applications were received for 252 funded places and the PEG confirms that the existing non-statutory providers are not operating to their maximum registration number and have spare capacity to address possible demand in the future;
- Consideration of projected live births for the specific wards would be more appropriate in considering the demand for pre-school places;
- Focus on the lack of formal integrated statutory provision undermines the non-sectoral nature of pre-school education; and

- Additional nursery provision in integrated schools could threaten very successful and valued shared education programmes.

41. The responses from Banbridge Nursery School and the CSSC are reproduced in full at Appendix D.

### **Northern Ireland Council for Integrated Education (NICIE) Comments**

42. NICIE has provided a commentary in support of DP 563 in which the main points are as follows:-

- Bridge IPS is generally an oversubscribed school (although 2018/19 is slightly down). This suggests that a nursery would be viable and help the school to be sustainable in the future;
- The school is characterised by its diverse enrolment and has welcomed children from all faiths and none. The religious balance of the staff demonstrates the truly integrated nature of the school;
- Approval of a NU at Bridge IPS will allow the school to maintain a positive balance of admissions while tackling the under provision of integrated pre-schools for children from mixed backgrounds or for those families that would prefer an early years education experience in a mixed and integrated environment;
- The proposal is the outcome of consultation with parents who expressed overwhelmingly the need and desire to have a NU for 26 children as part of the school;
- In the Banbridge and district areas there is no formally integrated pre-school provision;
- The proposal will assist the Department in meeting its duty to encourage and facilitate integrated education which was amplified in the Department's letter of 31 October 2017;
- Chief Inspector's Report 2012-14 stated that the employing authorities and the PEG should consider how best to provide a high quality service that is sustainable and effective within an area-based model;
- The EA's Providing Pathways Plan indicates that the population in the Armagh, Banbridge and Craigavon Council area is projected to increase by 9.6% over 10 years from 2014;
- The Belfast Agreement (1998) stated "An essential aspect of the reconciliation process is the promotion of a culture of tolerance at every level of society, including initiatives to facilitate and encourage integrated education and mixed housing";



- Parents and children will enjoy a more seamless 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;
- Any impact of the proposal would be spread across the high number of providers which contribute children to Bridge IPS and as such would be dissipated;
- There are very high numbers of children coming to Bridge IPS who are not accessing any form of pre-school education;
- The proposal is only for 26 part-time places whilst the admissions number for Bridge IPS is 58;
- There is a high level of oversubscription in pre-school provision in the catchment area of Bridge IPS, particularly in the statutory provision where no underage children were admitted;
- It is essential that integrated pre-school provision, which is genuinely non-sectoral, is allowed to expand in accordance with parents own preferences, as evidenced by the demand for places in integrated settings; and
- The process [DP] as presided over by the EA has caused delays and may have become a barrier in itself – NICIE is struggling to see how the EA Board is supporting the Department in its duty under Article 64 – at the PEG meeting on 23 May 2018 the PEG commented on the potential for increased uptake of younger children into statutory settings and on the impact on existing cross-community provision in relation to Shared Education. NICIE asserts however, that there are no underage children in any of the statutory settings in this area in 2018/19 and there are no partnerships operating in the “Sharing from the Start” in the Banbridge area.

43. NICIE’s detailed commentary on DP 563 is reproduced in full at Appendix D.

## **SUSTAINABILITY ASSESSMENT**

44. The SSP does not apply to pre-school provision. However, it is important when considering the establishment of a NU at a school that the host school is assessed. The following is an assessment of Bridge IPS against the six criteria of the SSP.

### **CRITERION 1: Quality Educational Experience**

45. An inspection of the school by the Education and Training Inspectorate (ETI) in January 2012 assessed the quality of education provided by the school as ‘good’.

46. The Inspection Report states that although the school had important strengths in most of its educational provision, an area for improvement was identified which the school had demonstrated the capacity to address which was:-

*‘the need to develop further the methods of planning and assessment in order to meet the varying needs of all the children’.*

47. The ETI report notes that the quality of the arrangements for pastoral care was considered very good and lists the ‘high quality of the pastoral provision’ as a strength of the school.

48. In September 2018, the ETI was unable to carry out an inspection of the school due to industrial action. The associated report indicates that ‘the school is a high priority for future inspection’.

#### Composite classes/ Teaching staff

49. The Case for Change indicates that the school employs 11 full-time teachers and seven part-time teachers including two Learning Support teachers. There are no composite classes at Bridge IPS and DE statistics confirm that in 2017/18 the school had a teaching complement of 16.57 full-time equivalent teachers.

#### Curricular and Extra-Curricular Activities

50. The Case for Change states that as well as delivering the full curriculum, a wide range of extra-curricular activities are also undertaken within the school including cycling proficiency, soccer, Gaelic football, badminton, netball, hockey, tennis, instrument tuition, choir, an award-winning film club, art club and Irish dancing. In addition, the school facilitates the provision of daily Breakfast and After School Clubs.

51. This is supported by the inspection report which states that the children have very good opportunities to participate in a wide range of extra-curricular activities, which enrich their personal development and learning experiences in sporting, drama and social contexts.

52. ETI comments in relation to DP 563 include that “a very good range of extra – curricular activities are offered to the children”.

#### Special Educational Needs

53. In 2018/19 Bridge IPS has 13 pupils with a statement of special educational needs. In 2018/19 there are 87 pupils at SEN stages 1-4.

54. The ETI inspection report of January 2012 advises that the school gives a high priority to those children who require support with their learning and allocates a substantial resource to improve the children’s learning.

55. The report assessed the quality of provision for special educational needs at Bridge IPS as ‘good’ with pupils being identified at an early stage through diagnostic testing and teacher observations. It also states that the current SEN provision is mainly through withdrawal sessions and this was assessed as of a very good quality.

56. The report further states that a special educational needs co-ordinator (SENCO) provides good leadership and management of the SEN provision and had created a highly

skilled Learning Support Team and that Bridge IPS receives support from the EA and the Curriculum Advisory Support Service for those children requiring specialised help.

Physical Environment

57. The inspection report confirms that the teachers and other staff have created stimulating learning environments in the classrooms and in the shared resource areas which support and celebrate the children’s work and the school is very well maintained.

**CRITERION 2: Stable Enrolment Trends**

58. Bridge IPS has an approved admissions number of 58 and an approved enrolment of 406. Historically, the school’s overall enrolment number has been above its approved number as detailed in Table 6, however, this includes pupils with a statement of special educational needs. The school’s enrolment is well in excess of the SSP’s recommended minimum enrolment of 105 pupils for a sustainable rural primary school. In 2018/19 Bridge IPS admitted 57 pupils and has a total enrolment of 417 pupils.

**Table 6: Bridge IPS - Historical Admissions and Enrolments (Approved 406)**

	<b>Approved</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>
Enrolment	406	410	416	413	417	417
Admission	58	59	59	60	60	57

First Preference Applications

59. Bridge IPS received a total of 55 first preference applications for 2019/20 at the close of the primary applications process. Figures for 2018/19 and 2019/20 are a reduction compared to the number of historical first preference applications set out in Table 7. 2018/19 was the first time that the school was not fully subscribed with applications for Year 1 places.

**Table 7: Historical First Preference Applications to Year 1 at Bridge IPS**

<b>Year</b>	<b>First Preference Applications</b>	<b>Total Admissions</b>
2014/15	71	58
2015/16	61	60
2016/17	74	60
2017/18	71	60
2018/19	54	54
2019/20*	55	55

\* position at the close of the primary applications process

**CRITERION 3: Sound Financial Position**

60. As a GMI school, the accounting arrangements differ from those of controlled or maintained schools and there is no available data on the school’s surplus or deficit position as at 31 March 2018.

61. All schools receive a delegated budget for the financial year on the basis of verified enrolments at the time of the October Census prior to the financial year. The school received a total delegated budget of £1,193,128 in the 2018/19 financial year for 415 full-

time equivalent (FTE) pupils<sup>2</sup>. This generates a per capita of £2,875<sup>3</sup> which compares to an average for all primary schools of £2,978.

62. The Case for Change states that the school is currently operating with an acceptable reserve surplus of £35,000 from April 2018. The Department has no immediate financial concerns in relation to Bridge IPS.

#### **CRITERION 4: Strong Leadership and Management**

63. The ETI inspection report of January 2012 assessed the overall quality of leadership and management of Bridge IPS as good. The report states that the Principal *'provides very good strategic leadership and exhibits a commitment to the inclusive ethos of the integrated school'*. Indeed, the *'very good quality of the leadership and management provided by the Principal'* is listed as a strength of the school.

64. The report details that the BoG expressed strong support for the work of the school, the leadership of the Principal and the commitment and dedication of its staff and that *'the Governors are fully involved in the strategic planning and policy development for the school'*. The report states that *'the Vice-principal, the acting Vice-principal and the co-ordinators are very supportive of the Principal'*.

#### **CRITERION 5: Accessibility**

65. The Case for Change includes the following table which details the distance travelled to school by pupils attending Bridge:

**Table 8: Bridge IPS – Distance Travelled to Bridge by Pupils (416)**

Distance	No of Children	Percentage
Up to 1 mile	257	61.8
1 to 2 miles	54	13
2 to 4 miles	49	11.8
4 to 6 miles	25	6
Over 6 miles	31	7.4

66. The Case for Change asserts that 74.8% of children attending Bridge IPS live within a two mile radius and 86.5% live within a four mile radius. It states that whilst Bridge IPS represents a local school at the heart of its community, 13.4% of the children travel more than four miles to school. It also states that Bridge IPS' central location within Banbridge provides ease of access for all its present pupils and for future pupils travelling from areas outside the immediate catchment area.

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<sup>2</sup> 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 receptions pupils, and over age pupils (paragraph 7 of Annex B to the Common Funding Scheme refers).'

<sup>3</sup> The school's delegated budget includes £28,964 and £51,800 for Landlord Maintenance and Administrative costs factor funding respectively, not applicable for controlled or maintained schools.

67. Map 1 illustrates that the majority of pupils who attend Bridge IPS live within the four mile radius of the school but a small number do travel up to 10 miles.

### **CRITERION 6: Strong Links with the Community**

68. The ETI inspection report of January 2012 states that Bridge IPS had developed effective links with the community which include local businesses and churches which enhance the children's learning experiences and opportunities for mutual understanding. ETI reported that the Governors spoke very positively about the close links the school has developed with the local community. The effective links and partnerships with the Governors, parents and local community are listed as a strength of the school.

69. Under the SSP the 'degree and quality of parental involvement' is cited as an indicator in support of this criterion. The report states that there is good communication with parents through newsletters, parent-teacher consultations and curricular meetings although it is noted that there is a need to further develop communication strategies.

70. It is reported that Bridge IPS collaborates with feeder schools on pupil transition arrangements and sharing of appropriate information. The Case for Change confirms that the school engages in transitional work with local pre-schools and post-primary schools, the school's Inter-generational Activities Programme with local Fold residents of Spelga Mews, the Junior Entrepreneurs Programme and in Town Sports annually. It also advises that the school is a partner in a Shared Education Partnership with St Ronan's PS in Newry.

### **Sustainability Summary**

71. The above evidence confirms that Bridge IPS is a popular and sustainable school providing good quality education provision. The school is financially viable with good quality leadership and management, has strong links with the community and is accessible to its pupils.

72. In conclusion, Bridge IPS is meeting the criteria of the SSP in full, therefore there are no concerns about its capacity to manage the proposed NU.

## **ANALYSIS OF SPECIAL CONSIDERATIONS**

### **Statutory Duties**

#### **Integrated Education**

73. The Department has written to the statutory planning authorities<sup>4</sup> reminding them of the need to support DE in the fulfilment of this duty, highlighting the role that the PEG should play in striving to meet demonstrated parental demand in an area for pre-school education at integrated primary schools.

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<sup>4</sup>The Department's letter of 31 October 2017 referred to in footnote 1 was further clarified in the Department's letter of 15 January 2018 to the EA that the Department and its NDPBs should ensure that the duty to encourage and facilitate has been thoroughly and explicitly addressed in all aspects of the decision making process.

74. The Department's letter of 31 October 2017 stressed the importance of supporting the Department in fulfilling its statutory duty '*by striving to meet demonstrated parental demand for pre-school education at GMI and controlled integrated primary schools*'. It specified that it is essential that the Department '*does not inadvertently constrain the development of integrated education*'.

75. Further clarification was set out in the Department's letter of 15 January 2018 that Justice Treacy concluded that the statutory duty applies only to Integrated education as a standalone concept as defined in Part V1 of the 1989 Education Reform Order rather than religiously mixed provision more generally. It further states that '*we should encourage and facilitate the development of integrated (and Irish-medium) education in ways we need not for other education provision by taking positive steps, or removing obstacles which inhibit the statutory duty*'. However, the letter also states that '*the implications of these statutory duties must be considered on a case by case basis, analysed and balanced alongside other relevant statutory and policy requirements to reach a reasoned conclusion*'.

76. The Case for Change states that Bridge IPS will contribute to meeting the needs of every pre-school aged child in the area by providing a viable alternative for those parents who would prefer an integrated education for their children. The Case for Change asserts that this will assist the Department in meeting its duty to encourage and facilitate integrated education.

77. NICIE states that the issue of underage children could be seen as a barrier to the establishment of integrated NUs and that '*further alteration in relation to this issue would require legislative change in order to remove the obligation on undersubscribed nurseries having to admit underage children*'. NICIE believes '*that this could be unfair, as potentially, a lack of action in implementing legislation for the underage children may be inhibiting the Department in exercising its duty to Article 64*'.

78. NICIE also states that in response to parental demand for Integrated education from age three, the BoG now wants to respond to these parents by establishing a NU to provide the full range of Integrated education experience for its pupils from three to 11 years old. NICIE states that this will assist the Department in meeting its duty.

79. Demand for Integrated pre-school provision in the area is considered in more detail under 'Other Considerations'.

## **Effective and Efficient Use of Public Funds**

80. 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. Statutory pre-school settings are legally obliged to admit pupils up to their published approved number.

81. PEG has strong concerns in relation to the impact of DP 563 including the '*potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds*'. The CSSC response received during the statutory two month objection period stated that Dromore NS 'accepted 13 younger



children' in 2017/18. However, as illustrated by Map 4, Dromore NS is not within a five mile radius of Bridge IPS but is approximately 8.4 miles away.

82. Statistics show that there have been two underage children enrolled in a statutory pre-school setting within the five mile radius of Bridge IPS in the last three years.

83. The level of pre-school provision in the area has decreased in the last few years as the PEG has managed provision in line with decreasing demand. The EA has confirmed that there is capacity within existing providers to increase provision should it be needed. Any increase in statutory provision at this time would be in excess of assessed overall demand and could lead to underage children accessing such provision in the area.

## **Shared Education**

84. The Case for Change states that the PEG expressed strong concerns about impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate. Additionally, both the CSSC response and NICIE's commentary on the proposal refer to Shared Education. The "*CSSC is concerned that the establishment of additional nursery provision could threaten very successful and valued Shared Education Programmes that currently exist*". NICIE has commented that "*the issues raised by both the PEG and the EA Education Committee of underage children and a duty to support Shared Education projects do not seem to be relevant, as there are no underage children in the settings in 2018/19 and there is no shared pre-school project mentioned on the Sharing from the Start website in the Banbridge area*".

85. The Case for Change asserts that "*approval for the establishment of a nursery unit at Bridge IPS will also increase the potential for shared education links in the area as Bridge IPS already enjoys good working relationships with...*" other local schools.

86. Of local pre-school providers, only Ballydown NU is engaged in Shared Education (through the Peace IV *Sharing from the Start* project). Both responses received during the statutory two month consultation period (from NICIE and CSSC) made reference to Shared Education. However, neither provided evidence to indicate that the proposal would be either beneficial or detrimental to progressing Shared Education.

87. EA conducted the pre-publication consultation and a summary (provided by the EA) of the comments received is included in the Case for Change. This includes one comment on Shared Education, that the proposal "*Would not enhance shared education in the area due to displacing cross-community provision already in place*". However, EA did not comment directly on implications for Shared Education.

## **Policy Context - Early Years**

88. 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, 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.

89. The Year 1 enrolment at Bridge IPS has been higher than the proposed NU size, suggesting that a pre-school unit could be sustainable.

90. However, 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.

91. The level of pre-school provision in the area is already high and the creation of additional provision is likely to further increase the level of overprovision and could result in the displacement of existing pre-school education provision and/or lead to additional underage children attending statutory pre-school education provision.

### **Rural Considerations**

92. The Rural Development Council's (RDC) Striking the Balance report highlights the importance of rural proofing so that regard is given to the impact of a particular policy on rural populations (in comparison to those living in urban areas) and to help identify adjustments which might be made to reflect rural needs and ensure that services are accessible to rural communities on a fair basis. A central concern is the quality of education provided to pupils.

93. The SSP policy was assessed against the RDC rural proofing checklist (Striking the Balance, Annex 1) and no adverse impact was identified. The SSP recognises the needs of rural communities and this is reflected in the lower enrolment threshold for rural primary schools, the accessibility criterion which provides guidance on home to school travel times and the criterion strong links with the community also recognises the central place a school has for many communities (rural and urban).

94. The Government's commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 ("The Act"). The Act requires public authorities to have 'due regard' to consciously consider the needs of people in rural areas when developing policies, strategies and plans and when designing and delivering public services. It defines 'rural needs' as "the social and economic needs of rural areas".

95. This proposal is in relation to the establishment of additional pre-school provision and as such would not be removing any educational services from the Banbridge area. As underage children are continuing to be enrolled in pre-schools in the area, this demonstrates an overprovision of places, meaning that pupils in rural areas are currently not being denied access to pre-school education. Should DP 563 be approved, additional pre-school places would be available in this rural area.

### **OTHER CONSIDERATIONS**

#### **Religious Balance**

96. DE policy is that integrated school settings should aim to attract at least 30 percent of pupils from the minority community within the school's enrolment, however, it is recognised that this can present challenges for individual schools, dependant on the local area, and also due to the increasing number of pupils designating as 'other' or 'no religion'.

97. In terms of the religious balance of pupils at Bridge IPS, Tables 9 and 10 confirm that historically and currently Bridge IPS has a very mixed enrolment with over 40% of pupils from both main traditions.

**Table 9 - Bridge IPS – Historical Religious Breakdown by Number**

Year	Protestant	Catholic	Other religions / religion not known	Total
2018/19	177	177	63	417
2017/18	178	181	58	417
2016/17	184	176	53	413
2015/16	182	179	55	416
2014/15	174	182	54	410
2013/14	167	184	59	410

**Table 10 - Bridge IPS – Historical Religious Breakdown by %**

Year	Protestant	Catholic	Other religions / Religion not known
2018/19	42	42	16
2017/18	43	43	14
2016/17	44	43	13
2015/16	44	43	13
2014/15	43	44	13
2013/14	41	45	14

98. NICIE’s commentary states that *“the school has demonstrated a healthy balance in applicants from the major faith tradition backgrounds as well as being highly sought after by those with other faiths or none. This demonstrates the capacity of the school to attract parents and families from both Catholic and Protestant and other denominations, providing proof of the strong integrated nature of the school”*.

99. NICIE, however, does not accept that all pre-school provision is non-sectoral. The commentary states that the Department’s statistics *“demonstrate that few Catholics are attending Controlled pre-school provision and that even fewer Protestants are attending Maintained pre-school provision”*. It also states that *“it is essential that integrated pre-school provision, which is genuinely non-sectoral, is allowed to expand in accordance with parents own preferences, as evidenced by the demand for places in integrated settings”*.

100. The response from the BoG of Banbridge Nursery School states that its *“school community is made up of governors, staff and families from a variety of different sectors. We are in fact integrated by religion, faith, culture and lifestyle”*.

101. The CSSC asserts that much emphasis is placed in the Case for Change on the opportunity to establish ‘formal integrated statutory provision’. *“CSSC is concerned that this emphasis on the lack of formal integrated statutory provision undermines the non-sectoral nature of pre-school education. All pre-school provision in the area is inclusive, child centred and focused on educating children together in a culture of respect and mutual understanding”*.

**Table 11: 2018/19 Religious Balance Statistics**

School Ref:	Statutory Pre-School Provision	Protestant	%	Catholic	%	Other / Not known	%	Total
	<b>NU</b>							
503-6043	St Mary's PS, Banbridge	0	0	27	96	*	*	#
501-1617	Ballydown NU	16	61	*	*	9	35	#
503-6061	St Colman's PS and All Saints' NU	0	0	30	100	0	0	30
501-1596	Gilford PS NU	11	42	8	31	7	27	26
	<b>Nursery School</b>							
511-6256	Downshire NS	22	42	10	19	20	39	52
511-6238	Banbridge NS	31	58	*	*	18	34	#
	<b>Non-statutory Pre-school (Funded places only)</b>							
5CA-0596	Child's Play	*	*	19	86	*	*	22
5BB-0557	St Mary's Playgroup~	*		*		*		*
5AB-0466	Humpty Dumpty	0	0	0	0	19	100	19
5CA-0559	Little Friends	17	50	13	38	*	12	#
5CA-0558	Ladybird Lane	11	50	6	27	5	23	22
5AA-0421	Loughbrickland	11	42	15	58	0	0	26
5AB-0234	Laurencetown	0	0	*	*	21	91	#

~withdrawn from programme – see ETI advice

102. Table 11 shows that in the NUs attached to Catholic Maintained Schools, there is no evidence of religious balance, however, in the Controlled NUs and nursery schools there is some evidence of religious balance, particularly in the NU at Gilford PS. There are also religiously balanced enrolments evident at some non-statutory pre-school providers in the area.

### **Effective Pre-school Provision in NI (EPPNI) Research**

103. NICIE, in its commentary on DP 563 states that the outcomes for children within NUs have been shown to be of a higher quality than those within playgroups. EPPNI research from 2006 states that “there are significant differences between pre-school settings and their impact on children. Nursery schools/classes have the best overall outcomes”.

**Assessed Need for Pre-school Provision in the Area**

104. The Case for Change claims that there has been ‘a long-standing interest in developing nursery provision at Bridge IPS in the event of need arising in the area which would then allow a DP to be progressed for Bridge IPS, such as this current shortfall’.

105. 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.92%; however the level of provision within local areas may be higher or lower, based on historic patterns of demand and assessment of ongoing need.

106. 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 the 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.

**Provision in the Area**

107. The number of pre-school education places and associated percentages are measured against the Year 1 enrolments for the 2016/17 and 2017/18 academic years using school census data together with provisional 2018/19 data provided by the EA.

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

**Table 12: Level of Provision – two mile radius of Bridge IPS**

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
2016/17	130	119	0	249	248	100.4%	0
2017/18	130	100	0	230	251	91.6%	1
2018/19	130	97	0	227	222	102.3%	0*
Proposed	156	97	-	253	222	113.9%	-

\* Source: EA PEG

109. The level of pre-school education provision within a two mile radius is currently above the planning figure of 95%. If the proposed additional statutory provision was approved, this would result in an increase to almost 114% within a two mile radius, approximately 42 places more than the planning figure.

110. NISRA figures predict an overall decline of 37 births in the area from 2018 to 2020. The reduction in the size of the P1 cohort from 2017/18 to 2018/19 is nearly 12%. This suggests that demand is likely to further decrease over time.

**Table 13: Level of Provision – five mile radius of Bridge IPS**

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
2016/17	208	171	0	379	417	90.9%	0
2017/18	208	140	0	348	420	82.9%	1
2018/19	208	146	0	354	370	95.7%	1*
Proposed	234	146	-	380	370	102.7%	-

\* Source: EA PEG

111. The level of provision within the five mile radius is currently close to the planning figure, and with the proposed increase in provision the level would increase to 102.7%. Overall, the statistics suggest there are currently sufficient pre-school education places in the wider area.

112. The EA PEG is managing provision in response to falling levels of demand which is illustrated by Table 5 which shows a drop in funded places at non-statutory providers overall from 171 places in 2016/17 to 140 places in 2017/18 with 146 places funded in 2018/19.

113. The Case for Change states that two pre-school education providers which acted as feeder settings for Bridge IPS have recently withdrawn from the pre-school education programme. The EA has confirmed that one pre-school education provider, which provided 26 pre-school education places within the two mile radius of Bridge IPS in 2016/17 and 18 places in 2017/18, withdrew from the PSEP for 2018/19 as it did not receive any allocation of pre-school places this year due to the level of over-provision in the area.

114. The Case for Change states that there is a shortfall in pre-school education provision within the area. Table 14 sets out application and enrolment data for pre-school education settings in the area for the 2018/19 academic year. A similar table appears in the Case for Change (Table 6), however, it does not contain information on four pre-school providers which collectively provide over 100 pre-school education places.

115. Although, as set out in the Case for Change, most statutory pre-school education settings in the area were oversubscribed, this does not take into account all pre-school provision, and there was no overall shortfall in the area. The EA has confirmed that there were sufficient places in the area across all pre-school education settings to provide a funded pre-school education place for every child whose parents wanted it by the end of the pre-school admissions process.

116. The Case for Change states that the number of children entering year 1 at Bridge IPS having no recorded pre-school education experience is indicative of under provision in the area. The Department aims to provide a funded pre-school education place for every child in their immediate pre-school year whose parents want it. This has been achieved in the Banbridge area, as all children who remained in the pre-school admissions process to the end had received the offer of a funded pre-school education place. Further to this, the EA reports (based on the previous ward boundaries) that for the 2018/19 academic year, there were 247 applications for 252 pre-school places in the Banbridge Area, suggesting



there is adequate provision in the area and no need for additional pre-school education places.

117. Overall in NI approximately 7%<sup>5</sup> of children have no pre-school education experience or unknown pre-school education experience. The figures reported in the Case for Change are that █████ pupils out of 60 in 2016/17 (#%) and 10 pupils out of 60 in 2017/18 (16.6%) had no pre-school experience. However, the EA PEG has advised that in both years, all children whose parents stayed with the admissions process to the end were placed. Existing providers had capacity to increase provision if additional places had been required, indicating that, if children did not attend pre-school education provision in that year, or did not remain with the admissions process, this may have been due to a choice made by their parents, rather than a lack of pre-school provision.

**Table 14: Application and enrolment data: 2018/19 academic year**

Setting	First Preference Applications*	Total Number Admitted
Downshire NS	57	52
Ballydown PS NU	32	26
Banbridge NS	53	52
St Mary's PS NU	49	26
Child's Play Day Nursery	12	22
Humpty Dumpty PG	5	15
Ladybird Lane PG	15	21
Little Friends PG	31	33
Loughbrickland PG	30	26
St Mary's PG	N/A	N/A
Laurencetown	23	23
Gilford PS	28	26
St Colman's PS NU	31	29
<b>TOTAL</b>	<b>366</b>	<b>351</b>

\* Source: EA

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<sup>5</sup> DE census figures

## Temporary Flexibility

118. In the 2016/17 academic year there were four additional pre-school places approved in statutory settings within a two mile radius of Bridge IPS through Temporary Flexibility. The same setting applied again for four places in 2018/19 but this was not supported by the PEG on the grounds that sufficient provision exists within the area to meet demand and the request was not approved.

119. In the 2017/18 academic year, no requests were made for Temporary Flexibility.

120. For the 2018/19 academic year, four Temporary Flexibility places have been approved at a statutory setting within the five mile radius.

## Quality of Pre-school Provision

121. Table 15 details the quality of education at the pre-school settings in the area as assessed by the ETI. This shows that in all settings apart from Gilford PS NU, the quality of education being provided has been assessed as 'good', 'very good', 'outstanding' or equivalent.

**Table 15: Quality of Education in Alternative Pre-school Provision**

Ref No	Setting	Date of Inspection	ETI Assessment
<b>Statutory</b>			
<b>2 miles</b>			
<b>Nursery School</b>			
511-6256	Downshire NS	Nov 2014	Outstanding
511-6238	Banbridge NS	Dec 2010	Outstanding
<b>Nursery Unit</b>			
503-6043	St Mary's PS NU	Oct 2015	Capacity to identify & bring about improvement.
<b>5 miles</b>			
501-1617	Ballydown PS NU	Feb 2016	Very Good
503-6061	St Colman's PS NU	Feb 2013	Good
501-1596	Gilford PS NU	Jan 2013 June 2016	Satisfactory Follow-up – Not demonstrated sufficient capacity
<b>Non-statutory</b>			
<b>2 miles</b>			
<b>Pre-School</b>			
5CA0596	Child's Play	2014	Very Good
5BB0557	St Mary's	June 2016	High Level of Capacity (1)
5AB0466	Humpty Dumpty	May 2012	Good
5CA0558	Ladybird Lane	May 2014	Very Good
5CA0559	Little Friends	May 2017	High level of capacity for sustained improvement.
<b>5 miles</b>			
5AA0421	Loughbrickland	Nov 2018	Capacity to identify & bring about improvement.
5AB0234	Laurencetown	March 2014	Very Good

## **Demand for Integrated Pre-school Provision in the Area**

122. The Case for Change states that in March 2018, 67% of parents and staff responded to the consultation on the provision of a NU and 98% agreed with the proposal.

123. It also states that the collection of 'Expressions of Interest' forms for Bridge IPS indicates an unmet demand for integrated provision in the town. At the time of the development of the Case for Change, 56 Expressions of Interest had been received spanning the 2018-2021 intake years, with 20 relevant to the 2019 intake year and 16 to the 2020 intake year. The Case for Change asserts that '*this identifies very significant support for integrated nursery provision in the Banbridge area*' and '*is demonstrating parental demand for integrated pre-school provision*'.

124. NICIE's commentary in relation to the proposal includes a table of Expressions of Interest forms broken down by religion as follows:

**Table 16: Bridge IPS – Expressions of Interest\***

<b>Year of Entry</b>	<b>Catholic</b>	<b>Protestant</b>	<b>Other/ None</b>	<b>Total</b>
2019	9	10	*	#
2020	9	5	*	#
2021	*	*	0	7

\* NICIE commentary submitted 19 November 2018

125. NICIE believes that this, together with the frequent oversubscription for P1 fulfils the requirement to demonstrate parental demand as stated in the letter from the Department of 31 October 2017.

126. The Case for Change states that there has been a noticeable increase in enquiries to the school about future enrolments as well as pre-school provision. It states that the proposed provision will meet parental preference for nursery provision in a school with an integrated management type and address demand which is unknown to the PEG.

127. The school's admissions and enrolment numbers have been consistent for a number of years although the school was undersubscribed with first preference applications for the first time in the 2018/19 year. This suggests that parents in the area may have a preference for education provision with an integrated management type and that pre-school provision at the school could be sustainable as the year one intake is considerably larger than the proposed nursery size of 26 part-time places.

### **Review of Integrated Education**

128. The Case for Change states that the Independent Review of Integrated Education (published 2 March 2017) highlighted the importance of the further development of integrated pre-school provision and recommended (Recommendation 6) that '*where clear demand is demonstrated, integrated pre-school provision (an integrated nursery or any pre-school linked directly to an integrated primary school) should receive funding and additional places even where there are unfilled pre-school places in other providers in the area*'.

129. The Report contains 39 recommendations some of which relate to pre-school education. However, the recommendations in the Report have not been accepted or endorsed at Departmental level or at Ministerial level.

130. In providing their response, the CSSC state that this recommendation is untenable in the current economic climate.

### **Impact**

131. It is the Department's practice, where possible, not to displace existing good quality pre-school provision with pre-school provision in an alternative setting. In considering DPs for statutory provision, careful consideration is given to the impact of any new statutory provision on existing good quality voluntary/private providers in PSEP. The PSEP is a partnership between statutory and voluntary/private pre-school providers and both sectors are equally valued for their contribution to the education of pre-school pupils.

132. The Case for Change states that Bridge IPS has been consistently oversubscribed with Year 1 applications. For the last decade the school has experienced oversubscription (up to 19 places) in first preference applications for P1 enrolments, being undersubscribed for the first time in 2018/19 (by four places).

133. This suggests that the proposed pre-school provision at Bridge IPS could be sustainable, as the admissions to Year 1 are significantly higher than the proposed NU size of 26 part-time places.

134. The Case for Change states that part of the potential impact of the establishment of a pre-school unit at the school could be mitigated, with some of the 26 additional places potentially being filled by children who may otherwise not avail of PSEP provision, such as the 10 P1 children mentioned in the Case for Change entering Bridge IPS in 2017/18 with no pre-school experience. As the EA has advised that all children whose parents stayed with the pre-school admissions process to the end received the offer of a funded place in 2017/18, there is no evidence to suggest that these children would have attended pre-school education provision at Bridge IPS had it been available.

135. The EA has indicated that spare capacity is available within non-statutory settings to increase the level of provision if needed, and the proposed change, if implemented, could impact on other provision. A non-statutory pre-school education provider, which provided 26 pre-school education places within the two mile radius of Bridge IPS in 2016/17 and 18 places in 2017/18, withdrew from the PSEP for 2018/19 as it did not receive any allocation of pre-school places this year due to the level of over-provision in the area.

136. The approval of this proposal could therefore have an impact on other current good quality pre-school education provision in the area, and/or lead to an increase in underage children accessing statutory pre-school education places in the area.

137. The CSSC in their response recognise the potential for the proposal to impact on the sustainability of Controlled schools in the area.

138. In providing qualified support for the proposal, the PEG raised strong concerns, one of which relates to the potential displacement of existing funded pre-school provision in the area.

139. The ETI states that if the pre-school provision of 26 part-time nursery places were to be agreed, there is likely to be an impact on smaller playgroups leading to sustainability issues.

140. The ETI, however, “*recognise the Department of Education’s statutory duty to encourage and facilitate the availability of integrated education opportunities to children and their parents; thereby, the development of the 26 part-time nursery unit places would enhance further the availability of places in the integrated sector in the Banbridge area. Given the overall enrolment trends of the school, particularly the Year 1 intake over a number of years, a nursery unit would be potentially sustainable*”.

141. The ETI express concern that displacement would occur if a new funded provider was established which would create the potential for underage children to be enrolled. They do, however, also cite potential benefits which include that the children “*will be immersed in the ethos of the integrated school’s vision and practices*” and early identification of special educational needs.

142. The creation of a new NU at Bridge IPS could therefore impact on the long-term enrolment numbers of other statutory and non-statutory providers in the area with the potential to displace already good quality provision.

143. All of the responses received by the EA during their pre-publication consultation were in objection to the proposal citing that there was no evidence of need for a new nursery unit in the area. They also stated that within the current settings, pre-school education is inclusive, offering child-centred cross-community education to all sectors of the local community. Both responses received during the statutory two month objection period also considered that the proposal had the potential to have a detrimental impact on the voluntary and private providers in the area.

144. NICIE contends that any impact of the proposal would be spread across the high number of providers which contribute children to Bridge IPS and as such would be dissipated. As the proposal is for 26 part-time places while the admissions number for Bridge IPS is 58, NICIE considers that any impact is less significant than would be the case if the proposal was for 52 places.

## **Financial Implications**

145. Any new provision (including new NUs) opening during the year are a pressure for the Department’s “New Schools & Units” fund. A new 26 part-time NU is likely to create a funding need of around £32k – based on past costs for such units opening during the financial year – for the period from opening to the end of that financial year. Full year costs to the Aggregated Schools Budget are likely to be approximately £55k.

146. Should the DP be approved, the Case for Change advises that the most significant resources required will be accommodation and staffing.

### Accommodation

147. The Case for Change advises that a modular classroom and toilets would need to be provided and furnished to provide suitable accommodation for a single nursery unit and external works would be required to provide suitable play areas and appropriate fencing around the building. It estimates the costs to be in the region of £300,000.



148. The school does not currently have any pre-school provision, so if the DP were approved additional accommodation would be required (most likely in modular form as this provides value for money and decreased build time over a traditional brick build construction). The average cost of modular nursery accommodation is approximately £300k so the cost assumptions in the Case for Change are broadly accurate. Final costs would depend on ground conditions at the school, access to services etc.

149. Lead in times for installation of mobile accommodation is around twelve months from the date of approval to completion on site. Timescales will vary, dependant on ground conditions, procurement and the planning approval process. It is therefore very unlikely that any additional accommodation to facilitate the DP would be in place by September 2019.

150. If the DP is approved the preferred option for delivery will not be known until a full feasibility report is undertaken by the EA. Both the Case for Change and Accommodation Template note that the school site is capable of housing a modular nursery unit and associated play area.

### Staffing

151. The Case for Change advises that one part-time teacher and one part-time classroom assistant would be required along with cleaning provision and administrative costs estimated at £48,000 but these costs would be met from within the school's budget.

152. In 2015 the Department provided funding for a teacher redundancy. Therefore should this proposal proceed the school must seek approval from the Department to increase the FTE at the school. In practice, this approval would be sought at the point a DP approval decision is communicated, should that be the outcome of this process.

### **SUMMARY**

153. There is a conflicted evidence base in relation to this DP:

- The PEG has given qualified support to the proposal in the context of the statutory duty to integrated education and demonstrated parental demand;
- The EA has noted the guidance provided by the Department, noted the recommendations of the PEG and also the terms of the Department's decision not to approve DP 487 in June 2017. The EA is concerned that approval of the DP will result in increased costs;
- The Department's Early Years Team is unable to conclude that the proposed additional provision is reasonable at this time; and
- The EA received five letters of objection during the pre-publication consultation and two letters of objection were received during the statutory two month objection period with one letter of support from NICIE.

154. The Department must balance a number of relevant statutory duties to integrated education, shared education, rurality and its duty to ensure effective and efficient use of public funds. It is a finely balanced consideration where the evidence can appear compelling in favour of either possible decision.

### Considerations that do not lend support to an approval decision

155. The current level of provision of pre-school places within both the two and five mile radii of Bridge IPS is higher than the planning figure of 95%, suggesting overprovision. This is further evidenced as a pre-school education provider withdrew from the PSEP for 2018/19 as it did not receive any allocation of pre-school places.

156. There are significant cost considerations associated with the proposal including accommodation costs estimated to be in the region of £300,000 together with additional staffing costs, although these would be met from the school's allocated budget.

157. In relation to resource funding, there would be an additional pressure on the Aggregated Schools Budget following the first year costs of £32k, charged against the Department's 'New Schools & Units' fund. The full year cost attributable to the ASB has been estimated at £55k.

158. Responses received in relation to DP 563 cited the potential for the proposal to displace current provision and have a detrimental impact on the voluntary and private providers.

159. Any detrimental impact on existing funded providers risks reducing the flexibility of the PSEP to respond to demographic variations and changes in parental preference.

### Considerations that do lend support to an approval decision

160. Bridge IPS is a viable and sustainable primary school providing good quality education provision to its pupils.

161. While there is sufficient pre-school education provision in the area to cater for overall levels of demand, at a five mile radius this is very close to the planning figure at 95.7%. There is, however, insufficient provision to meet demonstrated parental preference for pre-school education provision at a school of an integrated management type, demonstrated through Expressions of Interest and overall enrolment trends at the primary school.

162. There is no accessible alternative pre-school education provision at an integrated school. The closest alternative integrated provision is at Portadown IPS, approximately 11.5 miles away. Although Portadown IPS has two NUs both offering 26 part-time nursery places, these have been fully or oversubscribed in the last five years.

163. First preference applications to Bridge IPS have dropped slightly for 2018/19 and 2019/20. The Case for Change states that the "*development of an integrated pre-school at Bridge IPS would provide the only integrated setting in the area and would support the school in meeting a need as well as making a sustainable school more sustainable into the future whilst assisting in maintaining integrated provision in Banbridge*".

## CONCLUSION

164. On balance, the Department has issued guidance which requires, in this context, the demonstration of parental demand for additional pre-school education at a school of an integrated management type. Evidence of parental demand for this distinct form of provision has been provided.

165. There are no evidential areas of concern in relation to obligations under the Rural Needs Act and the Case for Change asserts that the establishment of a NU would increase the potential for shared education links in the area as Bridge IPS already enjoys good working relationships with other nursery, primary and post-primary schools. Concerns expressed by objectors in relation to Shared Education arrangements are not supported by clear evidence of detrimental impact.

166. The current level of provision within both the two and five mile radii is already above the planning figure. However, the PEG has been managing provision and has reduced the number of places funded in non-statutory pre-school settings in the area (as evidenced by Table 5) resulting in only two underage children being enrolled in a statutory setting within the five mile radius of Bridge IPS in the last three years. However, should DP 563 be approved, the number of underage pupils enrolled could increase.

167. There is also a risk of good quality established provision being displaced, and although NICIE argues that this would be a dispersed impact, this could nevertheless represent a material impact on the sustainability of established good quality providers. That is a risk that needs to be considered in the context of the Department's Article 64 duty.

168. Objectors understandably point to the costs associated with implementing this proposal at a time when the education budget is under pressure. There are significant capital costs associated with this proposal as well as additional annual resource costs of £55k attributable to the ASB plus additional salary and overhead costs charged against the school's delegated budget.

169. 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.

170. Although the current level of pre-school provision in the area has been sufficient and there are considerable cost implications associated with the proposal, there is evidence of parental demand for this distinct form of provision. With the only alternative pre-school provision at an Integrated setting located over 11 miles away, the evidence points towards a positive response in support of the Article 64 duty.

171. Earlier in this submission it was explained that, on the basis of Investment and Infrastructure Directorate advice, it is very unlikely that additional accommodation to facilitate implementation of the DP would be in place by September 2019. As a consequence, it is considered that a modification to the implementation date for DP 563 (September 2020 rather than September 2019) would be essential if an approval decision is the outcome. The need for this modification has been discussed and agreed with the proposer of DP 563.

172. Colleagues in the Integrated and Irish-medium Team have advised that they are content that the Department's duty under Article 64 of the Education Reform (Northern Ireland) 1989 Order to encourage and facilitate the development of integrated education has been fully considered in this submission. They consider that it also takes account of Departmental advice issued to the EA in letters dated 31/10/17 and 15/01/18, both of which clarified and outlined the implications of the statutory duty to integrated education in relation to pre-school provision at integrated primary schools. That advice further highlights the importance of DE fulfilling its duty by striving to meet demonstrated parental demand in an area (which is asserted in this case) for pre-school education at GMI and Controlled integrated primary schools; and taking positive steps or removing obstacles which inhibit the statutory duty.

## RECOMMENDATION

173. It is recommended that you:

- i. Approve DP 563 with a modification to the implementation date as follows:

*A single pre-school nursery unit will be established at Bridge IPS to provide 26 part-time nursery places with effect from 1 September 2020, or as soon as possible thereafter.*

- ii. Agree that this submission (with any appropriate redactions) can be published on the Department's website once the school and the EA have been informed of your decision.

174. The following appendices are attached for your consideration:-

- Appendix A - Published Development Proposal**
- Appendix B - Case for Change**
- Appendix C - Education and Training Inspectorate Comments**
- Appendix D - Statutory DP Processes**
  - (i) NICIE Commentary**
  - (ii) CSSC Comments**
  - (iii) Banbridge Nursery School response**
- Appendix E - DE Policy Team Comments**



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APPT Correspondence  
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**EDUCATION AUTHORITY**

**DEVELOPMENT PROPOSAL NO 563**

**BRIDGE INTEGRATED PRIMARY SCHOOL**

Notice is hereby given that a proposal, under Article 79 of the Education and Libraries (NI) Order 1989, has been submitted to the Education Authority by the Board of Governors of Bridge Integrated Primary School to the effect that:

**A single pre-school nursery unit will be established at Bridge Integrated Primary School to provide 26 part-time nursery places with effect from 1 September 2019, or as soon as possible thereafter.**

A copy of this Proposal and Case for Change may be inspected at offices of the Education Authority, 3 Charlemont Place, The Mall, Armagh, BT61 9AX between the hours of 9.00 am and 4.30 pm and [www.eani.org.uk](http://www.eani.org.uk) (Schools).

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](mailto: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).

Gavin Boyd  
Chief Executive



CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

AREA PLANNING DISTRICT	Armagh, Banbridge and Craigavon
DP NUMBER	563
PROPOSER	Board of Governors of Bridge Integrated Primary School
SCHOOL(S) NAME	Bridge Integrated Primary School
SCHOOL REFERENCE	506-6540
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	Week commencing 17 September 2018
PROPOSAL	The Board of Governors of Bridge Integrated Primary School proposes to establish a Grant Maintained Integrated Nursery Unit catering for 26 children on a part time basis with effect from 1 September 2019 or as soon as possible thereafter.

## STATUTORY CONSULTATION

*Note: It may be necessary for documentary evidence to be provided to show that the statutory procedures have been followed. It is essential that relevant parties retain this information.*

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

### EDUCATION AUTHORITY COMMENTARY ON PRE PUBLICATION STATUTORY CONSULTATION


<p><b>PROPOSER</b></p> <p>Provide detail of consultation with the Board of Governors, teachers and parents of the affected school(s) – dates of meetings / letters.</p> <p>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 taken into account before publication of the DP?</p>	<p>Meetings at which members of the Board of Governors including staff representatives were consulted on their views on the future development of the school: 13.06.17, 09.09.17, 15.11.17, 23.01.18 and 07.03.18</p> <p>Parental surveys were carried out in May 2015 and March 2018. On 23<sup>rd</sup> March 2018, the school consulted with 359 families of children attending and staff working in Bridge IPS.</p> <p>Staff were consulted on 23<sup>rd</sup> March 2018</p> <p>The views of the Governors, Staff and parents are detailed within the document and were unanimously in favour of taking forward a Development Proposal for a Nursery Unit.</p>
<p><b>CONFIRMATION BY THE PROPOSER</b></p>	<p>I confirm that the school(s) BOGs, Staff and Parents of pupils were consulted on and Equality Screening of the proposal has been carried out.</p> <p>NAME: J. HUGHES OFFICE HELD: Chair of Governors SIGNED: J. Hughes DATE: 7/5/19</p>

### ASSOCIATED PROPOSALS


<p>DP Published DD/MM/YY</p>	<p>None</p>
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The following is to be completed by the EA and signed off by it.

**EDUCATION AUTHORITY COMMENTARY ON PRE PUBLICATION STATUTORY CONSULTATION**

<p>The Education Authority</p>	<p>I confirm that the schools which the EA consider might be impacted by this proposal were consulted on 11 June 2018:</p> <p>Name: John Collings</p> <p>Office held: Director of Education</p> <p>SIGNED: </p> <p>DATE: 13 September 2018</p>
<p><b>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</b></p> <p><b>Summary of views received (number of responses, recurring themes, petitions, community support or opposition)</b></p> <p><b>Responses/Assurances in respect of issues raised during consultation</b></p> <p><b>Dates of EA meetings e.g. Education Committee Board etc.</b></p> <p><b>Details of issues raised by members of EA Board</b></p>	<p>In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 11 June 2018, to schools which, in the opinion of the Authority, might be affected by the proposal. A total of 54 local schools, 7 nursery schools and 20 pre-school providers 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 9 July 2018.</p> <p>The Education Authority received 5 responses in total, 2 responses from the pre-school providers, 2 responses from local nursery schools and one from the Controlled Schools' Support Council (CSSC).</p> <p>All responses did not support the Proposal. A summary of responses and recurring themes is provided below:</p> <ul style="list-style-type: none"> <li>• The increase in provision is not warranted as it would adversely affect current provision in the area.</li> <li>• Statistics do not support the increase.</li> <li>• After completion of the admissions procedure to nursery/pre-school in September 2017, no children who remained in the process were unplaced in the Banbridge Area.</li> <li>• There were 247 applications for</li> </ul>

	<p>September 2018 pre-school places in the Banbridge Area. The area has 252 places therefore 5 places were unfilled, therefore there is no need for further places in the area.</p> <ul style="list-style-type: none"> <li>• Displacement of current provision - under current policy and processes, it is the Department's practice not to displace outstanding/very good pre-school provision already in existence.</li> <li>• Nursery education is established as inter denominational. The current provision is, child centred and cross community school open to all sectors of the local community as are all nursery schools/units and pre-school providers in the area.</li> <li>• The Department must be mindful of its duty, as a public body, to ensure effective and efficient use of public funds, especially as there is over-provision in the area and at a time which school budgets are generally under stress. More prudent to invest in existing nursery provision in the Banbridge area.</li> <li>• A number of points in the proposal for change are open to interpretation.</li> <li>• No change to support the proposal and the rationale for refusal of Development Proposal No 487 should be re-iterated in respect of Development Proposal No 563.</li> <li>• The use of the birth rate in the whole of the Armagh, Banbridge and Craigavon Borough Council Area is too high level for an accurate projection, rather specific Banbridge area birth records should be applied identifying a decline in birth rates.</li> <li>• Is not based on evidence of need in terms of unmet demand.</li> <li>• Is not based on evidence of need in terms of birth rate trends in the area.</li> <li>• Would lead to displacement of quality, long established provision already available.</li> <li>• Would not result in value for money.</li> <li>• Would undermine the sustainability of non-statutory groups.</li> <li>• Would not enhance shared education in the area due to displacing cross-community provision already in place.</li> </ul> <p>This development proposal was discussed by EA's Education Committee at its meeting</p>
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	on 13 September 2018.
<p>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.</p> <p>Does the EA support the proposal?</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 13 September 2018</p>	<p>EA notes the guidance provided by DE and notes the recommendations of PEG; EA notes, also, the terms of the DE decision not to approve Development Proposal 487 in relation to Bridges PS in June 2017. 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</p> <p>The PEG report is included within the Case for Change paper.</p> <p>The proposal being taken forward by the Board of Governors is in accordance with the Education Authority’s Strategic Area Plan and Annual Action Plan 2018/19.</p>

**EDUCATION AUTHORITY**

**PRE-SCHOOL EDUCATION PROGRAMME 2018-19**

**DEVELOPMENT PROPOSAL TO ESTABLISH A 26 PART-TIME NURSERY UNIT AT BRIDGE INTEGRATED PRIMARY SCHOOL WITH EFFECT FROM 1 SEPTEMBER 2019 OR AS SOON AS POSSIBLE THEREAFTER**

**PEG Comments**

School	Bridge Integrated Primary School																		
Address	Ballygowan Road, Banbridge																		
Does PEG support the proposal?	<p>PEG considered the DP from Bridge 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 overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 26 place nursery unit would be sustainable.</p> <p>However, PEG would have strong concerns in regard to the potential impact of this additional provision, including:</p> <ul style="list-style-type: none"> <li>• Potential displacement of existing funded pre-school provision in the area. The P1 children attending Bridge IPS are currently accessing pre-school provision across a range of settings and additional pre-school provision may have significant negative impact on the following settings:- <table border="0"> <tr> <td>Downshire Nursery School</td> <td>13</td> </tr> <tr> <td>Little Friends PG</td> <td>10</td> </tr> <tr> <td>Banbridge Nursery School</td> <td>6</td> </tr> <tr> <td>Ladybird Lane PG</td> <td>5</td> </tr> <tr> <td>Child's Play Day Nursery</td> <td>6</td> </tr> <tr> <td>Humpty Dumpty Pre-School</td> <td>3</td> </tr> <tr> <td>Dromore Nursery School</td> <td>2</td> </tr> <tr> <td>Ballydown Nursery Unit</td> <td>1</td> </tr> <tr> <td>Laurencetown Pre-school</td> <td>2</td> </tr> </table> </li> <li>• Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds.</li> <li>• Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate.</li> </ul>	Downshire Nursery School	13	Little Friends PG	10	Banbridge Nursery School	6	Ladybird Lane PG	5	Child's Play Day Nursery	6	Humpty Dumpty Pre-School	3	Dromore Nursery School	2	Ballydown Nursery Unit	1	Laurencetown Pre-school	2
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Dromore Nursery School	2																		
Ballydown Nursery Unit	1																		
Laurencetown Pre-school	2																		
What is the potential impact if the proposal is/ is not approved? (alternatives for meeting demand/ potential for over provision)	<p>Statistics for the Ballydown, Banbridge West, Edenderry, Fort, Seapatrick and The Cut wards have been reviewed (see attached). A total of 252 funded places are available with 247 first preference applications received for September 2018. The figures would suggest sufficient provision already exists to cater for demand. Existing non-statutory settings still have spare capacity to address demand for September 2018.</p>																		

What is the PEG assessment of need for pre-school provision for the area? Is this need currently met?	Within the case for change it is highlighted that approximately 10 of the 60 P1 children have had no pre-school experience, however, spare capacity was available within non-statutory settings.															
How many 1 <sup>st</sup> preference applications were received by the setting? (usually 2 years figures but this depends on the timing of the development proposal)	<p>This is a request for new provision, therefore, statistics on 1<sup>st</sup> preference applications does not exist. However, Bridge IPS overview is as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Year 1</th> <th>Total Enrolment</th> </tr> </thead> <tbody> <tr> <td>2017-18</td> <td>60</td> <td>417</td> </tr> <tr> <td>2016-17</td> <td>60</td> <td>413</td> </tr> <tr> <td>2015-16</td> <td>59</td> <td>416</td> </tr> <tr> <td>2014-15</td> <td>59</td> <td>410</td> </tr> </tbody> </table>		Year 1	Total Enrolment	2017-18	60	417	2016-17	60	413	2015-16	59	416	2014-15	59	410
	Year 1	Total Enrolment														
2017-18	60	417														
2016-17	60	413														
2015-16	59	416														
2014-15	59	410														
Are there current or anticipated pressures in placing pre-school children in the area?	<p>Projected live births for the former ward areas of Ballydown, Banbridge West, Edenderry, Fort, Seapatrick and The Cut are:-</p> <p>2017 admissions 215  2018 admissions 214  2019 admissions 238</p>															
Have children been unplaced at the end of the process in previous years?	<p>2017-18 0 children  2016-17 0 children</p>															
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																
Can existing voluntary/private providers expand to help meet demand? Is there potential for new providers to come on to the programme?	Existing voluntary/private providers are not currently operating to their maximum registration number and have spare capacity to address possible demand in the future.															
What is the potential impact on existing good quality provision (displacement)?	If a new funded provider was established, displacement of existing provision would occur and create a potential for younger children to be admitted to nursery provision.															
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																





## **BACKGROUND**

### **Description of school**

Bridge Integrated Primary School is currently located on the Ballygowan Road, Banbridge.

The School, with a current enrolment of 417, serves the children of Banbridge and outlying areas including Waringstown, Dromore, Donaghcloney and Newry.

Description of school accommodation; Bridge IPS consists of 14 classrooms, 2 Learning Support rooms, 1 'Nurture Room', 1 library, an ICT Suite with a multi-purpose annex, a dining hall and kitchen, assembly/PE hall, resource room, staffroom, secretary's office, bursar's office and principal's office and vice-principal's office.

The current teaching staff consists of principal, 11 full-time teachers and 7 part-time teachers including 2 Learning Support teachers. The 11 classroom assistants, 2 school clerical officers, bursar, building supervisor, 5 supervisory assistants, meals staff and crossing patrol complete the full staff team.

The school was established by a group of parents from Banbridge and the surrounding areas and opened in 1987. Since the school opened in 1987 with 75 pupils, it has grown and developed into a popular, over-subscribed school with a current enrolment of 417.

As well as delivering the full curriculum a wide range of extra-curricular activities are also undertaken within the school including cycling proficiency, soccer, Gaelic football, badminton, netball, hockey, tennis, instrument tuition, choir, an award-winning film club, art club and Irish Dancing. In addition, the school facilitates the provision of a daily Breakfast Club between 8.00am and 9.00am, where the children have the opportunity of a healthy, nutritious breakfast and a daily After School Club from 2.00pm – 5.00pm each day.

Bridge Integrated Primary School is delighted to have a hard working Parents Group which contributes greatly to the social and financial support of the school. Recently, a Steering Group of the Board of Governors which includes parent Governors has been established

to take forward the nursery proposal within the school and local community. The membership of this stakeholder group comprises staff, parents and Governors.

The Board of Governors of Bridge Integrated PS believes that the proposed and 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.

## **Characteristics of the Area**

### **Council Area**

The council area in which the school is located, Armagh, Banbridge and Craigavon, is ranked 3<sup>rd</sup> behind Belfast, Derry City and Strabane for multiple deprivation measures. On Census Day 2011 there were **198,187** people (**99.25%** of the usually resident population) living in **75,506** households, giving an average household size of **2.62**. The remaining **1,506** people (**0.75%**) were living in communal establishments. **Between 2006 and 2016 the population of Armagh City, Banbridge and Craigavon Local Government District increased by 23,064 people or 12.3%.**

The 0-15 year old population is predicted to grow by 9.6% in this council area in the decade 2014-2024. (NISRA). This is the highest predicted growth in Northern Ireland.

On Census Day 27th March 2011, in **Armagh City, Banbridge and Craigavon** Local Government District (2014), considering the resident population:

- **1.39%** were from an ethnic minority population and the remaining **98.61%** were white (including Irish Traveller);
- **42.95%** belong to or were brought up in the Catholic religion and **51.74%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion; and
- **18.19%** of households did not have access to a car or van.

**Table1**

<b>Table 1: Population Estimates by broad age bands, 2016</b>		
	<b>Armagh City, Banbridge And Craigavon LGD</b>	<b>Northern Ireland</b>
<b>Total Population (2016)</b>	210,260	1,862,137
<b>Children (0-15 years)</b>	46,804	388,001
<b>Young Working Age (16-39 years)</b>	65,612	582,157
<b>Older Working Age (40-64 years)</b>	66,161	594,224
<b>Older (65+ years)</b>	31,683	297,755
<b>Population Change % (2006-2016)</b>	<b>12.3%</b>	<b>6.8%</b>
<b>Source NISRA</b>		

### **Population Change - 16-19 Year Olds**

The number of 16-19 year olds in Northern Ireland is projected to decrease by 0.2% throughout the decade 2014-2024 with a concurrent projected decrease in the number of 16-19 year olds in 6 of the 11 new LGDs. However, Armagh, Banbridge and Craigavon (ABC) goes against this trend demonstrating a predicted increase of 9.6%.

### **Ward Area**

Whilst the children enrolled at Bridge IPS come from a range of wards, twenty three in total, the school is located in the Fort ward from September 2017

**Table 2 – Bridge IPS enrolment by ward, distance to school and religious balance of wards**

Ward	No of children	Average Distance (miles)	Religious Balance		Deprivation
			Catholic %	Protestant %	
Ballydown	73	0.95	30.7	62	541
Ballyward	1	12.2	56.5	40.1	331
Banbridge West	100	0.42	38.4	54.7	289
Bannside	14	3.8	37.5	58.1	437
Donaghcloney	10	4.3	9.2	83.2	498
Donaghmore	10	7.9	64.7	33.5	377
Dromore North	2	7.2	18.3	73.9	344
Dromore South	7	6.9	14.2	77	505
Edenderry	55	0.42	48.5	45.2	117
Fort	28	0.37	27.4	66.9	309
Gilford	7	3.6	39.3	54.5	162
Gransha	5	7.2	13.8	79.4	405
Katesbridge	6	6.2	29.7	65.1	351
Lawrencetown	22	2.25	53.6	41.9	277
Loughbrickland	19	2.7	35	60.6	419
Maghaberry	2	9.1	11	80.9	521
Markethill	1	10.2	15	80.1	254
Quilly	3	4.6	14.4	80	475
Rathfriland	1	8.9	38.5	56.8	231
Seapatrick	17	1.1	22.9	71.8	460
Spelga	2	11.5	85	13.8	172
The Cut	29	0.6	35.7	57.1	<b>79</b>
Waringstown	1	7.1	8.7	84.2	531
None	2				

Fourteen of the 23 contributing wards are mixed with at least 20% of Catholic (or Protestant) of a mix. The remainder of the wards are less diverse. The religious balance in the school is strong at 42.7% Protestant, 43.4% Catholic and 13.9% Other.

Children attend Bridge IPS from a number of highly deprived wards. 84 children (20%) of the school's enrolment attend from two significantly deprived wards, namely The Cut and Edenderry /Banbridge which are in the top 25% of the most deprived wards in Northern Ireland.

**Table 3- Distance travelled to school by pupils attending Bridge IPS (using school postcode data) based on 416 children**

<b>Distance</b>	<b>No of children /percentage</b>
<b>Up to 1 mile</b>	<b>257 ; 61.8 %</b>
<b>1 to 2 mile</b>	<b>54 ; 13.0%</b>
<b>2 to 4 miles</b>	<b>49 ; 11.8%</b>
<b>4 to 6 miles</b>	<b>25 ; 6.0%</b>
<b>Over 6 miles</b>	<b>31; 7.4%</b>

Postcode analysis shows that 74.8% of children attending Bridge PS live within a two mile radius of the school and 86.5 % of the pupils reside within a 4 mile radius. Whilst Bridge IPS represents a local school at the heart of its community, 13.4% of the children travel more than 4 miles to attend the school. The approval of integrated provision through the establishment of additional nursery places will further support the school in assisting DE and EA in alleviating shortfall within the Banbridge town area. It will also meet parental demand for statutory integrated pre-school provision and address the unmet need and the demand which is unknown to the PEG system. It is concerning to note that a significant number of children (10) enrolling for P1 at Bridge IPS in 2017/18 arrived at school with no pre-school experience.

## **SUSTAINABILITY ASSESSMENT**

The Board of Governors of Bridge Integrated PS believes that the provision at the school, in conjunction with the proposed development highlighted in this development proposal will ensure the sustainability of this integrated school into the future in line with the Department of Education's Sustainable Schools Policy.

### **1) *Quality Educational Experience***

The most recent School Inspection in Jan 2012 highlighted;

- the high quality of the pastoral provision characterised by the inclusive and child-centred ethos that supports the development of the children's confidence and social skills;
- the inclusive culture which demonstrates a strong family ethos where the children are given valuable opportunities to voice their opinions and to be involved in decision-making at different levels
- very good attention to promoting healthy eating and physical activity
- the very good standards attained by the children in ICT and in Literacy
- the good standards achieved by the children in Mathematics and Numeracy
- the very good quality of the special educational needs provision in the learning support classes;
- the Special Educational Needs Co-ordinator (SENCO) provides very good leadership and management of the complex organisation of the SEN provision. She has created a highly skilled Learning Support Team.
- the Principal provides very good strategic leadership and exhibits a commitment to the inclusive ethos of the integrated school.
- the Principal gives a high priority to the well-being and care of all the children and to raising further the standards they attain
- the effective links and partnerships with the Governors, the parents and the local community.



- a parental survey carried out in May 2015 showed high levels of satisfaction regarding the learning and pastoral experiences and behaviour of the children.
  - 100% of children enjoyed learning at Bridge IPS.
  - 98.6% of parents felt that staff supported the care, dignity and wellbeing of their children.
  - 98.6% of parents felt that staff helped their children develop their personal, social and emotional skills.
  - 98.6% parents felt that staff listened to their views and their children's views and took these views into account.
  - 99.3% of parents were happy with their child's experience at Bridge IPS.
  - In March 2018, 67% of Bridge IPS parents and staff responded to the school's consultation on the provision of a Nursery Unit at Bridge IPS and an overwhelming 98% of respondents agreed with this proposal being put forward.

## **2) *Stable Enrolment Trends***

For the last decade the school has experienced a steady oversubscription in applications for P1 enrolments, ranging from 79 applications in 2010 to 71 applications for 2017/18 for a total of 60 places. Enrolments are stable with the maximum numbers being admitted each year. Parents have been enquiring for a number of years regarding pre-school provision at Bridge Integrated PS. The Board of Governors believe that Ministerial approval for a nursery unit to be established at Bridge Integrated PS would be a welcome addition to the provision available to parents and would meet parental demand as well as alleviating the shortfall in the area. Bridge IPS school is one of the few schools in the area which does not have a statutory Nursery Unit at present. In the 2016/17 year, there was some pressure in Banbridge in that there was approximately 17 children were unplaced who applied to first preference settings in Banbridge town with there being no additional provision available.

**Table 4:**

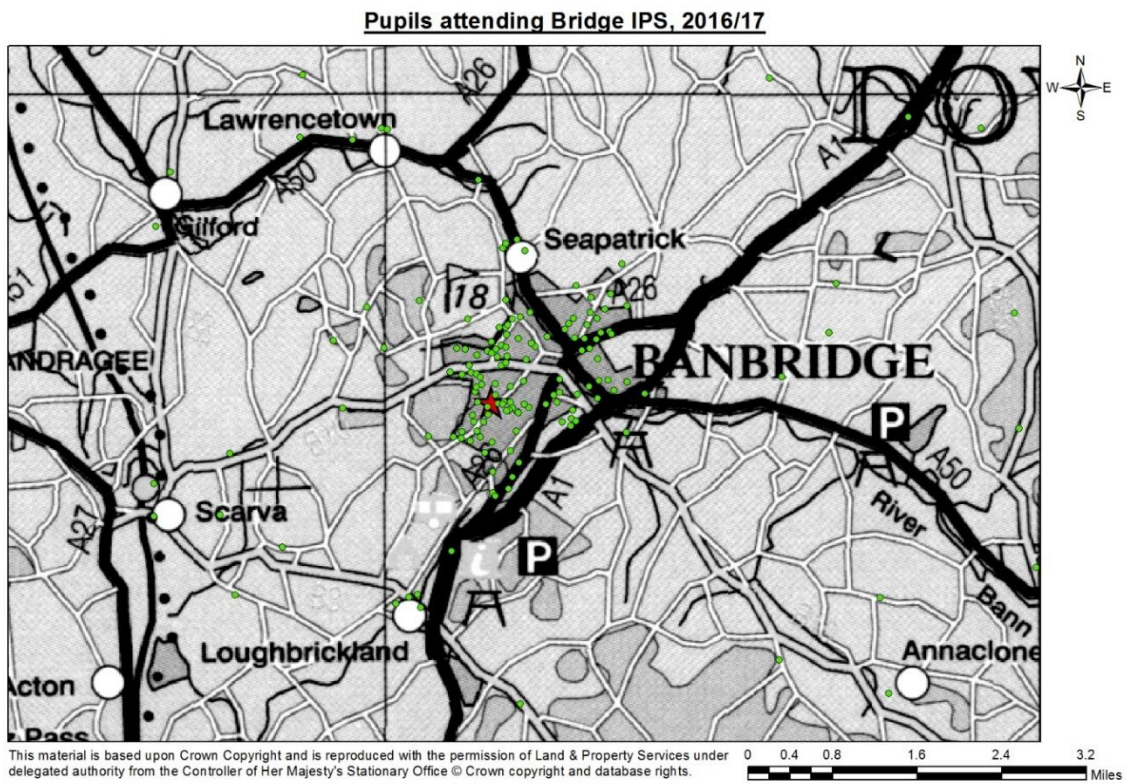
**APPLICATIONS AND ADMISSIONS TO PRIMARY 1 at Bridge Integrated Primary School**

Year	Total Applications	Total Admissions
2013/2014	79	58
2014/2015	71	58
2015/2016	62	60
2016/2017	74	60
2017/2018	71	60

Since the school opened its doors, there has been a noticeable increase in enquiries to the school about future enrolments as well as pre-school provision.

The Admissions Number for Bridge Integrated Primary School is 58 and the school's overall enrolment number is 406. The current enrolment of the school is 417.

**Figure1:**



## **Special Educational Needs and Free School Meals**

There are 109 of 417 children on the Code of Practice, nine of whom are statemented, Bridge IPS has a level of special needs at 26.2% which is above the Northern Ireland figure of 23.0%.

Currently, 112 of the 417 children are in receipt of Free School Meals, 28.2%, just slightly below the total percentage for Northern Ireland of 29.9%.

### **3) *Sound Financial Position***

The school is currently operating with an acceptable reserve surplus of £35,000 from April 2018.

### **4) *Strong Leadership and Management***

Bridge Integrated PS has a strong leadership team led by the Principal and Vice Principal. This was acknowledged in an ETI inspection of the school in January 2012 which noted the endeavours of *'the very good strategic leadership'* provided by the Principal. This commitment is now being brought to bear in this proposal to provide integrated pre-school provision at Bridge IPS and the principal and staff have engaged wholeheartedly in the process to bring this forward. The quality of education at Bridge IPS is good, as outlined in the most recent ETI inspection report carried out in January 2012.

### **5) *Easy Access***

Bridge Integrated PS's central location within Banbridge itself provides ease of access for all its present pupils. It is also easily accessible to future pupils travelling from areas outside the current immediate catchment area.

### **6) *Community Links***

As evidenced by ETI in January 2012, Bridge Integrated PS has strong links with the local community. Bridge IPS engages in transitional work with local pre-schools and post primary schools; the school's Inter-generational Activities Programme with the local Fold residents of Spelga Mews; participation in the

Junior Entrepreneurs Programme; participation in Town Sports annually and links with local businesses, including Tesco, further illustrates these strong links. Bridge IPS also are partners in a vibrant and ambitious Shared Education Partnership with St Ronan's PS in Newry.

## **Area Planning Impact**

NICIE have included this Development Proposal on the current Area Planning Action Plan 2018-19. One of the stated aims of Area Planning is to create a network of sustainable schools, the addition of a nursery unit would support the continued sustainability of Bridge IPS as a sustainable school going into the future.

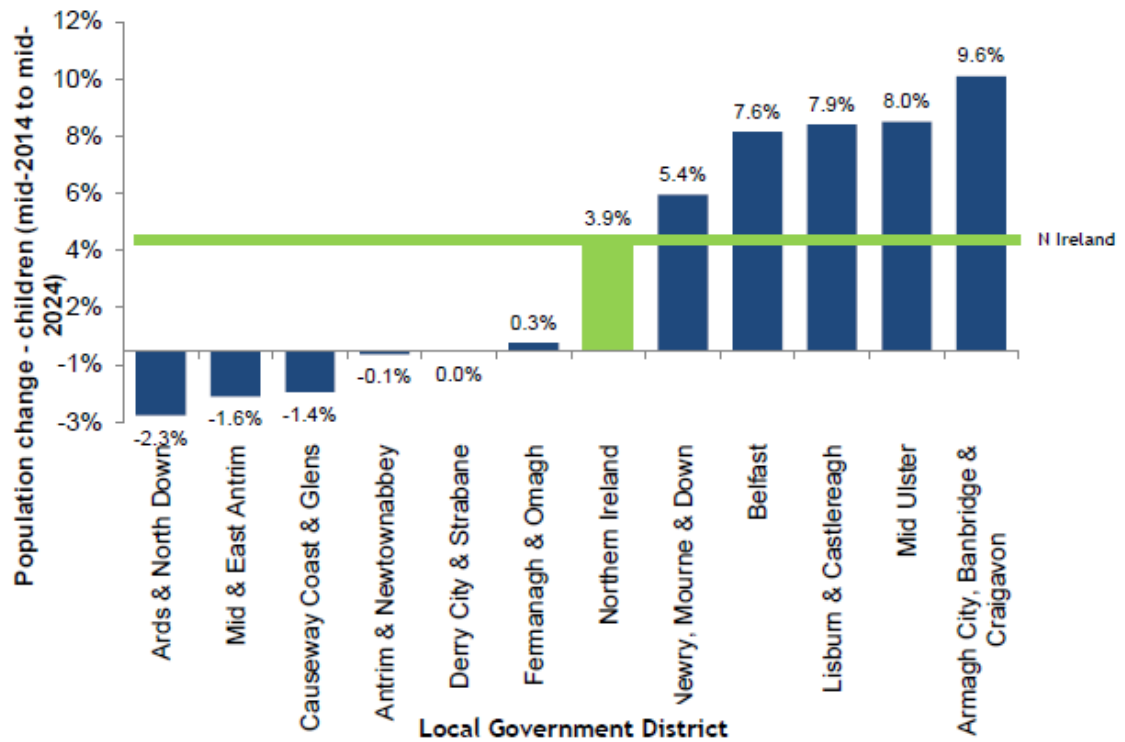
It is worth noting that the population growth in Armagh, Banbridge and Craigavon is predicted to be 9.6% during the next 10 years which is above the Northern Ireland average. See Figure 6 extracted from the Providing Pathways document.

The SELB Primary Area Plan 2014-2018 notes that Bridge IPS is the only integrated school in the Banbridge Area available to parents.

This proposal would address parental demand for Integrated Pre-School Education in the area. It should be noted that whilst there are a number of statutory controlled and maintained providers in the area, there is no integrated statutory provision available.

To estimate the impact Bridge IPS has looked at the preschool experience of the P1 children, in Table 5.

**Figure 6 Population Change 0-15 Year Olds**



**Source : Providing Pathways EANI**

**Impact on other schools**

There is parental demand for an integrated pre-school experience as can be seen from the parental consultation. Despite there being 12 pre-school settings accessed by children arriving at Bridge IPS for P1, it is important to note that a number of the P1 intake for Bridge IPS, over the past few years particularly, are arriving at school with no pre-school experience. Of the P1 intake of 60 pupils in 2017/18 in Table 1 below, 10 children had no pre-school experience. At 16.7% of the intake this is deeply concerning.

Over the past number of years, there has been an increasing number of parental enquiries regarding pre-school provision at Bridge IPS.

The prospect of this Development Proposal impacting on other local provision would be mitigated somewhat by the fact that pupils attending Bridge IPS attend

from a wide catchment area (23 wards) and therefore any impact on individual settings would be minimal. (See Figure 1 – Pupil distribution map – Bridge IPS).

**Table 5: Pre-school experience of Bridge IPS children in 2016/17 and 2017/18**

<b>Pre-school Provider</b>	<b>Number of children from this setting 2016/17</b>	<b>Number of children from this setting 2017/18</b>
Downshire Nursery	18	13
Little Friends	16	10
Banbridge Nursery	4	6
Ladybird Lane	5	5
Child's Play	7	6
Humpty Dumpty Pre-school	2	3
Dromore Nursery School	2	2
St Mary's Playgroup	1	0
St Francis's PS Lurgan	1	0
Sutton Heath Childcare Clinic	1	0
Ballydown Nursery	0	1
Laurencetown Preschool	0	2
Unnamed provision	0	2
<b>No preschool experience</b>	<b>3</b>	<b>10</b>
<b>Total</b>	<b>60</b>	<b>60</b>

This table 5 shows that the 60 children in this year's Primary 1 class have had their experience across 10 settings, many of which are over-subscribed. Thus the impact of a new nursery in Bridge would be spread very widely. It is important to note that 10 of the Year 1 year group for 2017/18 have not had any pre-school experience at all and this proposal would seek to address this.

A shortfall in pre-school providers within the Banbridge town area occurred in April 2016 with 17 children unplaced. Table 6 below shows the situation in 2017 where again there was significant oversubscription of 146 places when the total applications are considered against the provision. In 2018 there was a further shortfall of 19 places at 1<sup>st</sup> preference which seems to have been accommodated with extra places in the pre-school settings. The figures for 2018/19 are shown in Appendix 1 and were received from the EA. The statutory provision has either been fully subscribed or oversubscribed whilst the non-statutory settings appear to have had low numbers of 1<sup>st</sup> preference applications. It is notable therefore that whilst some of the non-statutory pre-school settings have been oversubscribed, many of them have had their allocation significantly increased beyond the level of their first preferences.

It is therefore unlikely that this proposal would affect the statutory sector. In addition, two of Bridge IPS feeder non-statutory providers now appear to have withdrawn from the programme. This may have an impact on the number of children starting primary school with no pre-school experience which is already at a worryingly high level.

There is oversubscription in the area and it would appear that where provision is located, is not meeting demand. As indicated above, there is very little mixing in the provision and the collection of Expression of Interest forms for Bridge IPS indicates an unmet demand for integrated provision in the town. Bridge IPS would therefore be very keen to establish a statutory nursery unit to support DE and EA in alleviating the oversubscription for pre-school provision in the town. It is worth reiterating that 10 children (16.7%) arrived at Bridge IPS for P1 in



September 2017 with no pre-school experience. This is very concerning as it does not meet DE's targets in this area.

**Table 6:**

**Admissions and Enrolments of Statutory Providers in Banbridge Area for 2017/18**

<b>Provider</b>	<b>Stat provider</b>	<b>No of funded places</b>	<b>No of 1<sup>st</sup> preference applications</b>	<b>Total Number of Applications</b>	<b>Number admitted</b>	<b>Over /under subscription total applications</b>
Downshire Nursery	52		58	71	52	+19
Little Friends		34	34	40	34	+6
Banbridge Nursery	52		57	70	52	+18
Ladybird Lane		14	9	14	14	-
Child's Play		16	18	23	16	+7
Humpty Dumpty Pre-school		17	10	20	16	+4
Dromore Nursery School	26		65	72	26	+46
St Mary's Playgroup		18	9	24	18	+6
St Francis's PS Lurgan	78		77	106	78	+28
Sutton Heath Childcare Clinic	-		-	-	-	-
Ballydown Nursery	26		38	41	26	+15
Laurencetown Preschool		24	18	21	21	-3

Source: EA

**Table 7: Religious Balance for Pre-School Settings feeding into Bridge IPS P1 intake for 2016/17 and 2017/18**

Name of Setting	Protestant (%)	Catholic (%)	Other (%)
Downshire Nursery	49.1%	15.1%	35.8%
Little Friends	64.7%	#	*
Banbridge Nursery	61.5%	*	#
Ladybird Lane	60%	*	*
Child's Play	*	68.8	*
Humpty Dumpty Pre-school	58.8%	#	*
Dromore Nursery School	51.9%	*	#
St Mary's Playgroup	0	100%	0
St Francis's PS Lurgan	0	100%	0
Sutton Heath Childcare Clinic	-	-	-
Ballydown PS Nursery Unit	69.2%	0	30.8%
Laurencetown Preschool	#	*	0

Source: DE School Level Data /DE Pre-School Data

Key:

-	means zero cases.				
*	refers to less than five cases where data is considered sensitive.				
#	means figure has been suppressed under rules of disclosure.				

**Based on 2016/17 DE statistics**, NICIE has presented information to the DE regarding the non-sectoral nature of pre-school provision. Using the value of 20% to 79.9% Catholic as denoting a setting which both of the main traditions can attend comfortably, i.e. truly non-sectoral:

- Eighteen out of the 95 nursery schools have between 20% and 79.9% Catholic, this is total of 18.9%.
- Ninety-one playgroups out of a total of 399 have a balance of between 20% and 79.9% Catholic, i.e. 22.8% and out of those 8 are the PEG funded integrated playgroups, 8.8%.
- Thirty-nine out of 238 nursery units, **16.8% have between 20% and 79.9% Catholics** and out of those 18 are integrated nursery units, 46.2%.

This pattern is also borne out in the Banbridge area as highlighted in Table 7 above.

From the Table 7 (above), it can be seen that the religious balance of the vast majority of pre-school settings is either predominantly Protestant or predominantly Catholic according to designation. Perhaps this is indicative of a lack of pre-school places in settings where children from all faiths and backgrounds can attend comfortably. Therefore, the creation of an integrated pre-school would address this issue and provide a local area solution.

### **Impact on other integrated settings**

The nearest integrated schools in the area are Saints and Scholars Integrated Primary School in Armagh at 18 miles, Portadown Integrated Primary School at 11.5 miles and Windmill Integrated Primary School at 28.6 miles distance from Bridge Integrated Primary School. Therefore approval for the development proposal for Bridge IPS will not in any way impact on these schools, rather it would provide a statutory integrated option in the Banbridge area for those parents and children who desire integrated provision.

## RATIONALE FOR CHANGE

Bridge Integrated PS has historically enjoyed a diverse enrolment. At the present time some 43.4% of pupils are from a Roman Catholic background, 42.7% from a Protestant background and 13.9% from other or no religious backgrounds. This religious balance is considered by NICIE to be very much in line with the NICIE Statement of Principles which provides ethos guidance for integrated schools. The desired balance is 40:40:20. The School Level Data 2017/18 indicates that the FSM for Bridge IPS is 28.2%.

NICIE submitted a paper to DE officials in July 2017. Subsequently, DE wrote to EA and CCMS on 31<sup>st</sup> 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.”*

The oversubscription in the area (shortfall) combined with the fact that much of the provision is in settings which are predominantly either Catholic or Protestant, aligned to the demonstrated parental demand from Bridge IPS parents indicates the need for the development of integrated pre-school provision. A survey carried out recently highlighted that 98% of respondents were in support of a Nursery Unit at Bridge IPS.

Development of an integrated pre-school unit at Bridge IPS would provide the only integrated setting in the area and would support the school in meeting a need as well as making a sustainable school more sustainable into the future whilst assisting in maintaining integrated primary provision in the Banbridge.

The drive for this current development has been as a result of a direct response to a shortfall of pre-school provision in the area. There is currently no integrated pre-school provision in the Banbridge and district area while there are a number of maintained and controlled nursery units and schools. Bridge

Integrated PS does not have any pre-school provision. It is a strong sustainable school which is oversubscribed. There has been a long-standing interest in developing nursery provision at Bridge IPS in the event of need arising in the area which would then allow a Development Proposal to be progressed for Bridge IPS, such as this current shortfall.

In addition:

- The staff and the Governors recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding, promoting excellence and celebrating difference. Integrated education is an ethos that permeates all aspects of school life in an environment underpinned by the 'Statement of Principles of Integrated Education'.
- Bridge IPS will contribute to meeting the needs of every pre-school aged child in the area by providing a viable alternative for those parents who would prefer an Integrated Education for their children. This will assist 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.
- Those involved in Bridge Integrated PS would like to play a role in moving towards a shared future for all.
- More recently, the Independent Review of Integrated Education carried out by Professor Margaret Topping and Mr Colm Cavanagh, on behalf of the Minister for Education, highlighted the importance of further development of integrated pre-school provision in Recommendation 6 which stated: *"That where clear demand is demonstrated, integrated pre-school provision (an integrated nursery or any pre-school linked directly to an integrated primary school) should receive funding and additional places even where there are unfilled pre-school places in other providers in the area."*

- The Belfast Agreement 1998, states, 'an essential aspect of the reconciliation process is the promotion of a culture of tolerance at every level of society and includes initiatives to facilitate and encourage integrated education and mixed housing'. The new school site is in an area of mixed housing and would allow parents the choice of a single integrated education from preschool through primary education.
- There has been a shortfall in provision. This is borne out by the 10 children arriving for P1 at Bridge IPS with no pre-school experience. There is oversubscription in the area and it would appear that where provision is located, is not meeting demand. As indicated above, there is very little mixing in the provision and the collection of Expression of Interest forms for Bridge IPS indicates an unmet demand for integrated provision in the town. Bridge IPS would therefore be very keen to establish a statutory nursery unit to support DE and EA in alleviating the oversubscription for pre-school provision in the town as well as providing much needed integrated pre-school provision. 16.7% of the P1 intake at Bridge IPS in September 2017 had no pre-school experience. This is very concerning as it does not meet DE's targets in this area.
- In March 2018, 67% of parents and staff at Bridge IPS responded to the consultation on the provision of a Nursery Unit at Bridge IPS and an overwhelming 98% of respondents agreed with this proposal being put forward.
- Approval for statutory nursery provision at Bridge IPS would support parents in being able to access highly sought after pre-school provision in an integrated school environment to complement the integrated primary experience from the age of 3 to 11 years in the Banbridge and surrounding area.
- Approval for the establishment of a nursery unit would support parents in accessing integrated educational provision from the age of 3 to 18 years in the Banbridge area ie moving directly from Bridge IPS to New-Bridge

Integrated College, to where at least 65% of the pupils transfer each year from P7.

### **Consultation with Governors and Parents**

NICIE Development officers have had on-going consultation and discussion with the Board of Governors over a number of years. In February 2018 officers met with school personnel including the Principal with regard to developing pre-school provision at Bridge IPS. NICIE has fully supported the school in developing this proposal.

The Governors have discussed this on a number of occasions, most recently at meetings on 13.06.17, 09.09.17, 15.11.17, 23.01.18 and 07.03.18.

### **Parental Consultation**

On 23<sup>rd</sup> March 2018, the school consulted with 359 families of children attending and staff working in Bridge IPS. Of that number 319 represented families with children attending the school, 242 replies were received of which 237 ie 98% of respondents were in support of providing a Nursery Unit at Bridge IPS.

Following receipt of the letter from Department of Education dated 31<sup>st</sup> October 2017 entitled "Pre-School Education and the Statutory Duty to Encourage and Facilitate the Growth of Integrated and Irish-Medium Education", Bridge IPS began to collect Expression of Interest forms from those parents who wished their child to be able to attend an integrated pre-school nursery provision in Banbridge.

The school has recently started to gather Expressions of Interest in relation to this proposal and to date, already a total of 56 have been received spanning the 2018 – 2021 intake years, with 20 relevant to the 2019 intake year and 16 to the 2020 intake year. This identifies very significant support for integrated nursery provision in the Banbridge area. This is demonstrating parental demand for

integrated pre-school provision.

#### **4. EDUCATIONAL IMPACT**

Approval for the establishment of a nursery unit at Bridge IPS will meet the current shortfall in provision in Banbridge area. The positive educational impact of this proposal would be significant for the school and area as it would provide an integrated pre-school education option within a school setting, something that the parents in the area desire, as evidenced by the oversubscription of Bridge IPS over the last 12 years.

Approval for the establishment of a nursery unit at Bridge IPS will also increase the potential for shared education links in the area as Bridge IPS already enjoys good working relationships with Downshire Nursery School, Banbridge Nursery School, Edenderry PS, Abercorn PS, St. Mary's PS, New-Bridge Integrated College, Banbridge High School, Banbridge Academy and St. Patrick's College. The approval of integrated provision through the establishment of additional nursery places will further support the school in assisting DE and EA in alleviating shortfall within the Banbridge town area. It will also meet parental demand for statutory integrated pre-school provision and address the unmet need and the demand which is unknown to the PEG system. It is concerning to note that a significant number of children (10) enrolling for P1 at Bridge IPS in 2017/18 arrived at school with no pre-school experience. Parental demand for integrated pre-school provision has been demonstrated.

#### **IMPLEMENTATION PLAN**

The proposal has an effective date of 31 August 2019 for implementation on its current site.

#### **RESOURCE IMPLICATIONS**

The most significant resources required will be accommodation and staffing.



If approved, implementation for the Development Proposal to establish a new 26 place nursery unit at Bridge IPS will take effect from 1<sup>st</sup> September 2019, or as soon as possible thereafter.

### **Accommodation**

In relation to the Development Proposal, a modular classroom and toilets would need to be provided and furnished to provide suitable accommodation for a single class nursery unit and external works would be required to provide suitable play areas and appropriate fencing around the building. It is anticipated that the cost of this would be in the region of £300,000.

### **Staffing**

One full time teacher and one part time classroom assistant, cleaning provision and administration costs would be required at an annual cost of approximately £48,000.

### **Site**

The school site which is just under 4 acres, will be able to accommodate a nursery unit.

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The proposal has an effective date of 1<sup>st</sup> September 2019.

There will be capital requirements if the development proposal is approved. There is sufficient space on the current site to accommodate a nursery unit.

## **STATUTORY CONSULTATION**

As is demonstrated above, a significant level of consultation has taken place in respect of this development proposal. The Board of Governors have discussed this with NICIE in the past and owing to no shortfall in the area, were unable to take a development proposal forward before now as DE would have considered there to be adequate provision existing in the area prior to this. Governors and the Principal have met with NICIE more recently in the 2015/16 academic year. NICIE officers provided detailed information to the Governors on 21<sup>st</sup> June 2016 and 7<sup>th</sup> March 2018.

Following the decision to go forward by the Board of Governors, a steering group has been established, comprising representatives of the governing body, parents and staff. This group has been charged with taking forward the development proposal for the establishment of a nursery unit.

## APPENDIX C

### ETI Development Proposal Commentary Paper

**Date of last ETI report:** January 2012

**Web link:** <https://www.etini.gov.uk/publications/focused-inspection-bridge-integrated-primary-school-banbridge>

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

The school was inspected by ETI on the 17 September 2018 in which the staff took action-short-of -strike. During the inspection, the school provided evidence that the arrangements for safeguarding children reflect broadly the guidance from the Department of Education.

In the 2012 ETI report, the quality of education provided by the school is good. The school has important strengths in most of its educational and pastoral provision. The inspection has identified areas for improvement which the school has demonstrated the capacity to address. The Education and Training Inspectorate will monitor the school's progress on the areas for improvement.

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

The ETI is aware that the playgroup in the grounds of St Mary's Primary School, Banbridge closed in June 2018 but the nursery unit remains open. The pre-school education group (PEG) places for St Mary's Playgroup were allocated to other PEG providers in the area.

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

Benefit:

- The pre-school children will be immersed in the ethos of the integrated school's vision and practices.
- The effective special educational needs provision in the Primary school would benefit the children in a potential nursery unit regarding early identification of need. Bridge IPS has a level of special needs at 26.2% which is above the Northern Ireland figure of 23.0%.

Concerns:

- The displacement of voluntary sector places in other settings previously evaluated as good to outstanding by the ETI. If a new funded provider was established, displacement of existing provision would occur and create a potential for younger children to be admitted to nursery provision. In addition, the voluntary and nursery providers in the area are cross community and open to all sectors of the local community.
- The pre-school data indicates that there were 247 applications for September 2018 pre-school places in the Banbridge Area. The area has 252 places therefore 5 places were unfilled.

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

Nursery unit accommodation may be required.

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 (include 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 results for Post-Primary Schools.	N/A		
	1.2 No more than <u>two</u> composite year groups in a single classroom at primary school level.	N/A		
	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.	Yes		
	1.4 The ability of the school to cater for children with Special Educational Needs.	Yes		
	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.	N/A		N/A
	1.6 The standards and the quality of learning and teaching at the school.	Yes	Quality of the education provided by the school is good; the school has the capacity to identify and bring about improvement based on the 2012 inspection.	
	1.7 The range of	Yes	A very good range of extra –	

Sustainable Schools Criterion	Indicator	Meets criterion		
		Yes	No (include reason(s))	Information not available
	curricular and extra-curricular activities available for children including career guidance, physical education, music, art, drama and science.		curricular activities are offered to the children.	
	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.	Yes		
	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.	Yes		
Strong Leadership and Management by Boards of Governors and Principals	4.1 Governors' views on the school based on quantitative and qualitative evidence.	Yes		
	4.8 There is a school development plan in place and progress is being made to achieve the plan's aims and objectives.	Yes	SDP guides well the work of the school with a clear strategic direction for ongoing improvement which the school has the capacity to bring about.	
	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).	Yes	Very strong pupil voice in the school; the children in Year 7 act as 'anti-bullying ambassadors' and receive appropriate training to undertake their roles through the 'Diana Awards.'	
<b>Strong links with the</b>	6.1 Degree and quality of parental involvement	Yes		

Sustainable Schools Criterion	Indicator	Meets criterion		
		Yes	No (include reason(s))	Information not available
Community	(schools will be asked to provide evidence on this).			
	6.3 Contribution of the school to the community (schools will be asked to provide evidence on this).	Yes		
	6.4 Presence of other features of provision, e.g. nursery or specialist unit.	No		

6. Overall conclusion of impact of the proposal

- If the pre-school provision of 26 part-time nursery places were to be agreed, there is likely to be an impact on smaller playgroups leading to sustainability issues.
- The ETI recognise the Department of Education's statutory duty to encourage and facilitate the availability of integrated education opportunities to children and their parents; thereby, the development of the 26 part-time nursery unit places would enhance further the availability of places in the integrated sector in the Banbridge area. Given the overall enrolment trends of the school, particularly the Year 1 intake over a number of years, a nursery unit would be potentially sustainable.

**(i) NICIE****Background to nursery units within the integrated sector**

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, 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 May 2018, a total of 17 Grant Maintained Integrated primary schools have nursery units. Of the Controlled Integrated Primary Schools, four have nursery units. Currently there are 5 integrated playgroups in GMI schools. Of the Controlled Integrated Primary Schools, there are 7 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.

Integrated primary schools 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.

NICIE has raised the matter of the assertion that Pre-school provision being non-sectoral with senior officials in the Department of Education.

Referring to the 2016/17 statistics and using the value of 20% to 79.9% Catholic as denoting a setting which both of the main traditions can attend comfortably, i.e. truly non-sectoral:

- Eighteen out of the 95 nursery schools have between 20% and 79.9% Catholic, this is a total of 18.9%.
- Ninety-one playgroups out of a total of 399 have a balance of between 20% and 79.9% Catholic, i.e. 22.8% and out of those 8 are the PEG funded integrated playgroups, 8.8%.
- Thirty-nine out of 238 nursery units, 16.8% have between 20% and 79.9% Catholics and out of those 18 are integrated nursery units, 46.2%.

It is very difficult then to see how pre-school provision can be described as being non-sectoral in reality.

The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). The importance of early intervention has been underlined in the Chief Inspector's Report 2012-2014. The more recent Chief Inspector's Report 2014-16 highlighted the continuing need to improve transitions between the different phases of education and stated that *"Greater collaboration is required, within and across the sectors (particularly for transition to the foundation stage) to share best practice and build effectively upon the progress in learning that the children have already made."* The report also stated that *"Staff, as a whole, need better opportunities for ongoing training and professional development and especially for the sharing of best practice across the whole pre-school statutory and private and voluntary sector."* NICIE would argue that transition and continuing professional development are both more easily achieved in a nursery unit setting than a voluntary playgroup.

The importance of a sustainable pre-school service has been highlighted by the Chief Inspector’s Report in 2012-2014. Within a nursery unit, staffing and finance (through LMS) is more easily managed by the BoG and Principal of the primary school than when operating as a separate BoG committee with its own distinct PEG funding stream for a playgroup.

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 31<sup>st</sup> 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.

In Appendix, 1 NICIE has collated the list of meetings and extracts of EA minutes where the integrated pre-school proposals that have been affected by these two letters have been considered. For ease of reading tables have been included here.

## Table 1 Timeline for Pre-school proposals

### Submission dates for the preschool proposals

School	Date submitted to EA	Date first published	End of Objection Period	Date EA decided to submit opinion to DE or added comment to CfC
Drumlins IPS	25/5/17	15/11/17	15/1/18	31 May 2018
Rowandale IPS	1/8/17	16/11/17	16/1/18	31 May 2018
Mill Strand IPS	30/11/17	16/5/18	16/7/18	10 May 2018
Enniskillen IPS	23/10/17	16/5/18	16/7/18	10 May 2018
Bridge IPS	14/5/18	18/09/18	19/11/18	13 Sept 2018



**Table 2 List of EA meetings at which the pre-school proposals were discussed**

<b>EA, Committee or PEG meeting</b>	<b>Date</b>
PEG meeting	25 October 2017
Education Committee	9 November 2017
Education Committee	11 January 2018
PEG meeting	29 January 2018
Education Committee	8 February 2018
Extraordinary meeting of PEG	27 February 2018
Education Committee	8 March 2018
EA Board	29 March 2018
Education Committee	12 April 2018
EA Board	26 April 2018
Children and Young People's Services Committee	3 May 2018
Education Committee	10 May 2018
PEG Meeting (Bridge discussed)	23 May 2018
EA Board	31 May 2018
Education Committee	13 September 2018

There is also the issue of Forge IPS nursery unit. The objection period for this closed on 20/12/16, nearly two years ago.

To ensure consultation had been fully addressed to the playgroups and not just the affected schools NICIE agreed that consultation would be repeated for Enniskillen and Mill Strand's proposals.

That aside, the process, as presided over by EA, has certainly caused delays and may have become a barrier in itself. Given the protracted nature of the discussions at the various meeting summarised above and in detail in the appendix, NICIE is struggling to see how the EA Board is supporting DE in its duty under Article 64 of the Education Reform Order (NI) 1989.

At the PEG meeting on 23<sup>rd</sup> May 2018, the comments from PEG were noted in the draft PEG comment as:

- "Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds."
- "Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education."

These comments were further echoed in the EA Education Committee meeting of the 13<sup>th</sup> September 2018, the extract of the minutes of which are included in Appendix 1. The issue of

underage children in statutory settings has been problematic in the past. However, since “Learning to Learn” (2013) was published, a strategy was introduced to allow underage children to be admitted only at the second stage of the Admissions process. Further alterations to this issue would require legislative change in order to remove the obligation on undersubscribed nurseries having to admit underage children. NICIE would contend that the issue of underage children could be seen as a barrier to the establishment of integrated nursery units. NICIE believes that this could be unfair, as potentially, a lack of action in implementing legislation for the underage children may be inhibiting the Department from exercising its duty to Article 64 duty “to encourage and facilitate the growth of Integrated Education”.

The relevance of underage children in the case of Bridge IPS is somewhat questionable, as in Table 7 below, the pattern of admissions demonstrates that there are no underage children in any of the statutory settings in this area in 2018-19.

NICIE is somewhat confused as to why Shared Education is being referred to by PEG as examination of the partnerships currently operating in the “Sharing from the Start” does not reveal a partnership operating in the Banbridge area. <https://www.sharingfromthestart.org/partnerships/>

## 2. Introduction

### Description of school

Bridge IPS opened in 1987 and since then the school has grown from 75 pupils to its current enrolment of 416 pupils. Whilst the 2018/19 is slightly down, it is generally an oversubscribed school with applications for P1 enrolments in 2017/18 reaching 80 for a total of 60 places. This suggests that a nursery provision in the school would be viable and would help the school to be sustainable in the future and financially sound. The school has been characterised by its diverse enrolment where 46% are from the Roman Catholic background, 44% from a Protestant background and 10% from other or no religious background.

**Table 3 School Enrolment**

Year	Admissions Number	Total Applications	Total Admissions
2013/2014	58	79	58
2014/2015	58	71	58
2015/2016	58	62	60
2016/2017	58	74	60
2017/2018	58	80	60
2018/2019	58	54	54

Since the school was established it has welcomed children from all faiths and none and has always promoted the core principles of Integrated Education: Equality, Social Responsibility, Faith and Values and Parental Involvement.

At present the teaching staff consists of the principal, 11 full-time teachers and 7 part-time teachers including 2 Learning Support teachers. The classroom assistants, school clerical officers, bursar, building supervisor, supervisory assistants, meals staff and crossing patrol complete the full staff team. The staff meet the individual and collective needs of all children. The religious balance amongst staff also reflects the rich and diverse balance which exists within the pupil body and demonstrates the truly integrated nature of the school. The school currently has 26.9% pupils in receipt of FSM.

A recent school inspection of the quality of the educational experience at Bridge IPS has highlighted the high quality of areas such as: pastoral provision; inclusive culture; healthy eating and physical activity; the standards attained by the children in ICT and Literacy, and Mathematics and Numeracy; special educational needs provision, effective management of the school by the principal and positive links and partnerships with the governors, the parents and the local community.

Bridge IPS is located in a central area of Banbridge that provides easy access for pupils within the school 3 mile radius but it is also easily accessible to potential pupils traveling from a broader catchment area. The majority of the children enrolled at the school come from the local Banbridge area (82.8%) and 17.5% from areas beyond the 3 mile radius. A small number of children attending the school travel up to 10 miles to access integrated education.

## **Characteristics of the Area**

### **Council Area and Ward area**

#### **Armagh, Banbridge and Craigavon Local District Council Area**

The estimated population of Armagh City, Banbridge and Craigavon Local Government District at 30 June 2016 was 210,260, of which 104,323 (49.6%) were male and 105,937 (50.4%) were female.

This was made up of:

- 46,804 children aged 0-15 years;

- 65,612 people aged 16-39 years;
- 66,161 people aged 40-64 years; and
- 31,683 people 65 years and older.
- 

Between 2006 and 2016 the population of Armagh City, Banbridge and Craigavon Local Government District increased by 23,064 people or 12.3%.

On Census Day 27th March 2011, in Armagh, Banbridge and Craigavon Local Government District (2014), considering the resident population, 45.9% belong to or were brought up in the Catholic religion and 48.04% belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion.

On Census Day 27th March 2011, the NISRA database shows that **Fort Ward** where the school is located was made up as follows

99.20% (of people) were from the white (including Irish Traveller) ethnic group;

27.45% belong to or were brought up in the Catholic religion and 66.96% belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion; and

68.32% indicated that they had a British national identity, 12.14% had an Irish national identity and 28.13% had a Northern Irish national identity.

Whilst the NISRA database notes that between 2007 and 2017 the population of Banbridge (former) Local Government District increased by 3,985 people or 8.6%, the Providing Pathways report indicates that the population change in a 10 year period from 2014 is projected to increase by 9.6% in the Armagh City, Banbridge and Craigavon, the highest growth in Northern Ireland.

Approval of a nursery unit at Bridge IPS will allow the school to maintain a positive balance of admissions while tackling the under provision of integrated pre-schools for children from mixed background or from those families that would prefer to provide to their children an early years education experience in a mixed and integrated environment.

## **Community Planning**

The Armagh, Banbridge and Craigavon Community Plan highlights that “the total population in the Armagh City, Banbridge and Craigavon areas is projected to increase by 15% by 2030 which is more than double that projected for Northern Ireland as a whole (7%). This region is also expected to have a significant increase in the number of children, with the largest percentage growth in Northern Ireland of the number of children aged 0-15 (8% by 2030).”

## **2.1. Rationale behind the current Development Proposal to establish a nursery unit.**

Recently a development proposal for the establishment of a nursery unit at Bridge Integrated Primary School was submitted by the school's Board of Governors to the Department of Education. This proposal is the outcome of consultation with parents from the school who expressed overwhelmingly the need and their desire to have a Nursery Unit for 26 children as part of the school. As a result a Steering Group which includes governors, parents, and school staff has been established to work with the school and local community in the process of taking forward this development proposal.

The main reason for Bridge IPS seeking to establish a nursery unit as part of the school lies in the existing demand of parents who want integrated pre-school provision at Bridge IPS. Currently, although there are several maintained and controlled nursery schools and units in the Banbridge and district areas, there is no formally integrated pre-school provision. All the other statutory sectors represented in Banbridge have nursery schools or units associated with them, except the integrated school. In response to parental demand for integrated education from age three, the Board of Governors now want to respond to these parents by establishing a nursery unit to provide the full range of integrated education experience for its pupils from three to 11 years old. This will assist 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.

The establishment of a nursery unit would support the school in delivering improved outcomes for children, and help an often oversubscribed school to continue to be sustainable into the future. In considering the proposal for a nursery unit at Banbridge IPS, it is worth noting the Chief Inspector's Report of 2012-2014. This highlights 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.”

Following receipt of the letter from Department of Education dated 31<sup>st</sup> October 2017 entitled “Pre-School Education and the Statutory Duty to Encourage and Facilitate the Growth of Integrated and Irish-Medium Education”, Bridge IPS began to collect Expression of Interest forms from those parents who wished their child to be able to attend an integrated pre-school nursery provision in Banbridge, see Table 4 below.

**Table 4 - Expressions of Interest – Bridge IPS – Nursery**

<b>Year of entry</b>	<b>RC</b>	<b>P</b>	<b>O/N</b>	<b>Total</b>
<b>2019</b>	<b>9</b>	<b>10</b>	<b>1</b>	<b>20</b>
<b>2020</b>	<b>9</b>	<b>5</b>	<b>3</b>	<b>17</b>
<b>2021</b>	<b>3</b>	<b>4</b>	<b>0</b>	<b>7</b>

Source: Bridge IPS Expression of Interest forms

As Table 4 shows there is significant parental demand for integrated pre-school nursery provision at Bridge IPS. The EOIs also show reasonable religious balance. This, together with the frequent over-subscription for P1, NICIE believes, fulfils the requirement to demonstrate parental demand as stated in the letter from DE on 31<sup>st</sup> October 2017.

The PEG committee meeting, at which the development proposal /Case for change for Bridge IPS was discussed, took place 23<sup>rd</sup> May 2018. This was after the DE officers had attended the PEG meeting on 29<sup>th</sup> January 2018 and the letters were received from the Department of Education (31<sup>st</sup> October 2017 and 15<sup>th</sup> January 2018). However, when the matter was discussed at the Education Committee on 13<sup>th</sup> September 2018, the minutes reference the fact that the previous proposal had been turned down in June 2017(prior to the DE letter) and whilst referencing the DE Guidance /Duty “to encourage and facilitate Integrated Education in the pre-school sector”, the ultimate recommendation was that the proposal should not be supported.

## **2.2. Additional reasons to approve this proposal include:**

- The Providing Pathways plan also makes reference to dealing with the increase in population through encouraging and facilitating sustainable integrated schools, and a

nursery unit at Bridge IPS will contribute to meeting the demand of pre-school provision as a result of the expected population growth. The Pathways report indicates that the population change in a 10 year period from 2014 is projected to increase by 9.6% in the Armagh, Banbridge and Craigavon council area, this is higher than the Northern Ireland average figure of 3.9% and the highest in Northern Ireland. This report also highlights positive actions and commitments to encourage and facilitate sustainable integrated schools. Approval of a nursery unit at Bridge PS will allow the school to maintain a positive balance of admissions while tackling the under provision of integrated pre-schools for children from mixed background or from those families that would prefer to provide to their children an early years education experience in a mixed and integrated environment.

- The Belfast Agreement (1998) stated “An essential aspect of the reconciliation process is the promotion of a culture of tolerance at every level of society, including initiatives to facilitate and encourage integrated education and mixed housing.” The population mix in the former Banbridge LGD in the 2011 census was 32.0% Catholic and 62.0% Protestant and Other Christian. It is thus important to provide integrated education provision which ensures that all of the community is served and parental demand is met. This suggests that an integrated nursery unit will be welcomed and may indeed be a preferred option for many families in the area.

### **2.3. 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. The Chief Inspector’s Report 2012-2014 highlighted the importance of transition by stressing “the need for a reliable form of assessment that is rigorously and externally moderated and linked closely with the statements of what the child knows, understands and can do.”

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. This is of a particular importance considering that over 26.1% of the children at Bridge IPS are included in the special needs register. This is higher than the total percentage across Northern Ireland of children who have special education needs at 23.0%.

### 3. Impact on other settings

Using Table 5 from the Case for Change and updating it with the 2018/19 figures producing a list of the 17 pre-school providers where the P1 children from Bridge IPS attended over the last 3 years. It seems reasonable to suggest that these providers would be those which could be affected by a nursery unit in Bridge IPS. The first thing to note is the high number of providers which do contribute children. Thus any impact would be spread across all of these providers and as such dissipated. Secondly as was said in the case for Change there are very high numbers of children coming to Bridge IPS who are not accessing any form of pre-school education, 11.7% in 2017/17 and 10.5% in 2018/19. Given the fact that some parents are accessing unfunded pre-school provision, this means that the percentage of children who have access to funded provision in this school is well below the Northern Ireland average of around 92%. It should also be noted that the proposal is only for 26 part-time places, whilst the admissions number for Bridge IPS is 58. Therefore any impact on the settings in the Table 5 is not as significant as if the request was for 52 places or if Bridge were a single form entry school. It is also important to note that Banbridge is an area of growth with the Armagh, Banbridge and Craigavon LGD.

**Table 5: Pre-school experience of Bridge IPS children in 2016/17, 2017/18 and 2018/19**

Pre-school Provider	Number of children from this setting 2016/17	Number of children from this setting 2017/18	Number of children from this setting 2018/19
Downshire Nursery	18	13	20
Little Friends	16	10	10
Banbridge Nursery	4	6	7
Ladybird Lane	5	5	*
Child's Play	7	6	*
Humpty Dumpty Pre-school	*	*	*
Dromore Nursery School	*	*	*
St Mary's Playgroup	*	0	0
St Francis's PS Lurgan	*	0	0
Sutton Heath Childcare Clinic	1	0	0
Busy Bees Pre-school Burren	0	0	*
Loughbrickland Pre-school	0	0	*
Newtownhamilton Nursery School	0	*	*
Kids@BT9	0	0	*
Ballydown Nursery School	0	*	*



Laurencetown Preschool	0	*	*
Bella Bambini	0	*	0
Unnamed provision	0	*	0
No preschool experience	*	7	6
Total	60	60	57

**Table 6:**

**Admissions and Enrolments of Statutory Providers in Banbridge Area for 2018/19**

Provider	Stat provider	No of funded places	No of 1 <sup>st</sup> preference applications	Total Number of Applicatio ns	Number admitted	Over /under subscripti on total applicatio ns
Downshire Nursery FT	52	52	57	70	52	+18
Little Friends	34	34	31	45	34	+11
Banbridge Nursery	52	52	53	63	52	+11
Ladybird Lane	22	22	15	22	21	+1
Child's Play	22	22	12	24	22	+2
Humpty Dumpty Pre- school	26	26	5	15	15	-
Dromore Nursery School FT	26	26	80	92	26	+66
St Mary's Playgroup	26	26	49	50	26	+24
St Francis's PS Lurgan	78	78	78	100	78	+22
Sutton Heath Childcare Clinic	-					
Ballydown Nursery	26	26	32	34	26	+8

Laurencetown Preschool	23	23	23	23	23	0
Busy Bees Preschool Burren	24	24	25	25	24	+1
Loughbricklan d Preschool	26	26	30	33	26	+7
Kids@BT9	24	24	22	31	24	+7
Bella Bambinos (Private Daycare)						
<b>TOTAL</b>	<b>461</b>	<b>461</b>	<b>512</b>	<b>627</b>	<b>449</b>	<b>+178</b>

Source: EA

Table 6 shows that there is a very high level of oversubscription at both 1<sup>st</sup> preference and total preference in pre-school provision located in the catchment area of Bridge IPS. In particular, the statutory provision is significantly oversubscribed and this is reflected in Table 7 which looks at applications and admissions pattern for underage children in the area. Table 7 shows that, whilst there were 25 applications in total, no underage children were admitted. This would seem to be contrary to the assumption made that approval for a nursery unit at Bridge IPS would lead to an increase in underage children in statutory nursery settings in the PEG and EA comments on this proposal. Indeed it is worth noting that an analysis of the underage applications and admissions by council area shows that apart from Belfast (7.6%), Armagh, Banbridge and Craigavon has the lowest admission rate for underage applications (17.7%). The other council areas range from 20.7% to 47.4%.

**Table 7**

**Underage Applications and Admissions to Statutory Providers in the Banbridge and local Area 2018/19**

<b>Statutory Provider</b>	<b>Total Applications</b>	<b>Underage</b>	<b>Total Admissions</b>	<b>Underage</b>
Downshire Nursery School	*		0	
Banbridge Nursery School (FT)	*		0	
Dromore Nursery School (FT)	11		0	
St Francis PS, Lurgan	7		0	
Ballydown Nursery	*		0	

Source: EA

**Table 8: Religious Balance for Pre-School Settings feeding into Bridge IPS P1 intake for 2017/18**

Name of Setting	Protestant (%)	Catholic (%)	Other (%)
Downshire Nursery	49.1	15.1	35.8
Little Friends	64.7	#	*
Banbridge Nursery	61.5	*	#
Ladybird Lane	60	*	*
Child's Play	*	68.8	*
Humpty Dumpty Pre-school	58.8	#	*
Dromore Nursery School	41	*	#
St Mary's Playgroup	0	#	*
St Francis's PS Lurgan	0	98.7	*
Sutton Heath Childcare Clinic	n/k	n/k	n/k
Ballydown PS Nursery Unit	73.1	*	23.1
Laurencetown Preschool	*	#	0
Busy Bees Preschool Burren	0	66.7	33.3
Loughbrickland Preschool	34.8	65.2	0
Kids@BT9	23.8	33.3	42.9
Bella Bambinos (Private Daycare)	n/k	n/k	n/k

\* refers to less than five cases where data is considered sensitive

# means figure has been suppressed under rules of disclosure

In Table 8, whilst Downshire Nursery School and Loughbrickland Pre-School demonstrates some degree of mixing, the remainder of the settings draw their children from predominantly one tradition or the other. It is worth noting that only Loughbrickland preschool shows a mix of 20%

Catholic and 20% Protestant. Also, since Loughbrickland has only provided 1 child in 3 years (to Bridge) their pre-school education, this is not a significant issue. This would indicate the need for an integrated setting to reflect the demographic make-up of the area.

The provision of the pre-school unit in Bridge IPS would create a level playing field for Bridge IPS as the schools have either feeder nursery schools or nursery units co-located with them.

### **3.1. Impact on other integrated provision**

Approval for the establishment of an integrated nurse unit at Bridge IPS will not have any impact on any other integrated schools as they are located at a considerable distance from the school; instead it would provide a statutory integrated option in the Banbridge area for those parents and children who desire integrated provision. The nearest integrated schools in the area are Portadown Integrated Primary School at 11.5 miles and Rowandale Integrated Primary School at 12.7 miles from Bridge Integrated Primary School. Rowandale has a community playgroup and has applied for a nursery unit DP535 which close for comments on 16 January 2018. Portadown IPS NU is significantly oversubscribed.

The Department of Education uses a 2 mile radius as the catchment area to assess over/under provision in an urban area and a 5 mile radius in a rural area, yet integrated schools generally draw from a much wider area than this, with some schools demonstrating double these distances. It should be noted that whilst many of the children attending Bridge IPS come from the Banbridge town area, the school also serves a number of rural wards.

## **4. Religious Balance**

The school has demonstrated a healthy balance in applicants from the major faith tradition backgrounds as well as being highly sought after by those with other faiths or none. This demonstrates the capacity of the school to attract parents and families from both Catholic and Protestant and other denominations, providing proof of the strong integrated nature of the school.

**Table 9: Religious balance at Banbridge IPS**

Year	Protestants	Catholics	Other
2017-2018	42.7%	43.4%	13.9%

2016-2017	44.6%	42.6%	12.8%
2015-2016	43.8%	43.0%	13.2%
2014-2015	42.2%	44.4%	13.2%

Source: DE School Level Data

In the introduction to this commentary, it was noted that NICIE does not accept the premise that all pre-school provision is non-sectoral. This is borne out in the Department's own statistics which regularly demonstrate that few Catholics are attending Controlled pre-school provision and that even fewer Protestants are attending Maintained pre-school provision. It is essential that integrated pre-school provision, which is genuinely non-sectoral, is allowed to expand in accordance with parents own preferences, as evidenced by the demand for places in integrated settings.

Table 8 above clearly illustrates the sectoral nature of non-integrated pre-school provision. Although it can be argued that these pre-school settings welcome children from all denominations, cultures, and faiths, only one setting (Loughbrickland Pre-School) demonstrates a level of mixing at 20% or more. Therefore, parents are being denied the possibility of choosing a formal integrated pre-school setting.

## Concluding Remarks

Bridge Integrated PS opened in 1987 and has had a significant history of oversubscription for its 14 class base school. The Board of Governors of Bridge Integrated Primary School has submitted this proposal for the establishment of a nursery unit under The Education Reform Order (1989) which places an obligation on the Department of Education to "encourage and facilitate the development of integrated education that is the education together of Catholic and Protestant children". In addition, the Belfast Agreement (1998) applies as it states:

*'An essential aspect of the reconciliation process is the promotion of a culture of tolerance at every level of society and includes initiatives to facilitate and encourage integrated education and mixed housing.'*

Bridge Integrated Primary School has been significantly oversubscribed over the years with a current enrolment in 2018/19 of 413. This clearly indicates the capacity of the school to attract families interested in an integrated school provision for their children. It is argued that this success would be easily replicated if an integrated nursery unit is established as part of the school. The number of parents who have completed Expression of Interest forms for admission to the

proposed nursery unit in 2019 and subsequent years, demonstrates the parental demand that this integrated pre-school provision would command. It is heartening to note at this early stage that there is a reasonable religious balance among the Expression of Interest forms.

The data presented in this commentary clearly shows that currently pre-school provision available in the area is attended on a largely traditional basis with one pre-school exception, which is only a very minor contributor to Bridge. The majority of families that chose to send their children to Bridge Integrated PS had to accept a pre-school experience from one or other sector. The evidence suggests that an integrated pre-school provision would be viable if parents are given the choice in the Banbridge area.

The issues raised by both the PEG and EA Education Committee of underage children and a duty to support Shared Education projects do not seem to be relevant, as there are no underage children in the settings in 2018/19 and there is no shared pre-school project mentioned on the Sharing from the Start website in the Banbridge area.

In addition only one of the funded settings, which is a minor contributor to Bridge, in the local area demonstrates a mix of a least 20% Catholic and 20% Protestant. The rest of the settings draw predominantly from one background or the other, thus the PEG comments about cross community provision are not borne out. Indeed, it seems pertinent here to mention that Justice Treacy said that Integrated Education is a standalone concept.

Equity of pre-school provision requires the availability of a wide range of choices, enabling parents to choose the kind of early years education they want for their children. Currently, although there are a number of maintained and controlled nursery schools and units at schools in the Banbridge and district areas, there is no formally integrated pre-school provision.

The population growth predicted for the Armagh, Banbridge and Craigavon area indicates the need to allocate more resources to meet the demand for school places and housing. The Community Plan has highlighted that the region is also expected to have a significant increase in the number of children, with the largest percentage growth in Northern Ireland of the number of children aged 0-15 (8% by 2030).

DE has a duty to encourage and facilitate the growth of Integrated Education and in this case to support a sustainable, integrated school into the future. The lack of flexibility for statutory provision to respond to demand within a relevant timeframe has inhibited the establishment of

statutory integrated provision at Bridge IPS. NICIE believe that it would be important to support this proposal to address the ongoing demand for Pre-School and Primary 1 provision at Bridge IPS, which in turn will help to address the increasing demand for provision in the Banbridge area.

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 letter from DE of 31<sup>st</sup> October 2017 in relation to "Pre-School Education and the Statutory Duty to Encourage and Facilitate the Growth of Integrated and Irish-Medium Education."

**Senior Development Officer**

19<sup>th</sup> November 2018

**References:**

[www.ninis.nisra.gov.uk](http://www.ninis.nisra.gov.uk)

[www.eani.org.uk](http://www.eani.org.uk)

[www.armaghbanbridgecraigavon.gov.uk](http://www.armaghbanbridgecraigavon.gov.uk)

[www.education-ni.gov.uk](http://www.education-ni.gov.uk)

## Appendix 1

### Timeline for Pre-school proposals in 2017/18

#### Submission dates for the preschool proposals

School	Date submitted to EA	Date first published	End of Objection Period	Date EA decided to submit opinion to DE or added comment to CFC
Drumlins IPS	25/5/17	15/11/17	15/1/18	31 May 2018
Rowandale IPS	1/8/17	16/11/17	16/1/18	31 May 2018
Mill Strand IPS	30/11/17	16/5/18	16/7/18	10 May 2018
Enniskillen IPS	23/10/17	16/5/18	16/7/18	10 May 2018
Bridge IPS	14/5/18	18/09/18	19/11/18	13 Sept 2018

There is also the issue of Forge IPS nursery unit. The objection period for this closed on 20/12/16, over 18 months ago.

#### List of EA meetings at which the pre-school proposals were discussed

EA, Committee or PEG meeting	Date
PEG meeting	25 October 2017
Education Committee	9 November 2017
Education Committee	11 January 2018
PEG meeting	29 January 2018
Education Committee	8 February 2018
Extraordinary meeting of PEG	27 February 2018
Education Committee	8 March 2018
EA Board	29 March 2018
Education Committee	12 April 2018
EA Board	26 April 2018
Children and Young People's Services Committee	3 May 2018
Education Committee	10 May 2018
PEG Committee ( Bridge Discussed)	23 May 2018
EA Board	31 May 2018
Education Committee	13 September 2018



To ensure consultation had been fully addressed to the playgroups and not just the affected schools NICIE agreed that consultation would be repeated for Enniskillen and Mill Strand's proposals.

The process, as presided over by EA, has certainly caused delays and may have become a barrier in itself. Given the protracted nature of the discussions at the various meetings summarised above and in detail in rest of the appendix, NICIE is struggling to see how the EA Board is supporting DE in its duty under Article 64 of the Education Reform Order (NI) 1989.

## **EXTRACTS OF THE MINUTES OF MEETINGS ADDRESSING THE PRE-SCHOOL PROPOSALS**

### **Extract of PEG minutes 25 October 2017**

#### **9. DEVELOPMENT PROPOSALS**

##### **Oakwood Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the Derryaghy and surrounding ward areas. It was noted that 24 funded places are currently available within Oakwood Integrated PG. Following lengthy discussion members agreed to support the proposal as it would have no impact on current provision and the staffing issues are being managed by the school who is the employer for both settings.

##### **Drumlins Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the Ballynahinch and surrounding ward areas. It was noted that the current figures suggest that sufficient provision already exists in the area and that current non-statutory PSEP provision was not being funded to their maximum registration and could be increased to cater for possible demand in the future. Following lengthy discussion members agreed that the figures suggested sufficient pre-school provision exists within the area and PEG was not in a position to support the proposal.

██████████ advised she had recently met with DE officials regarding pre-school provision in the Integrated sector and that existing provision was not sufficient to meet demand. ██████████

██████████ advised that pre-schools within the voluntary/community sector operate on a cross-community basis and whilst they may not call themselves integrated they are non-denominational. ██████████ asked for it to be noted, should a regional discussion take place on this issue that all sectors should be included within the consultation exercise.

##### **Bunscoil Bheanna Boirche**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the Castlewellan area. It was noted that 26 funded places are currently available within Naiscoil Bheanna Boirche. Following lengthy discussion members agreed to support the proposal as it would have no impact on current provision and the staffing issues are being managed by the school.

### **Rowandale Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the Lagan and surrounding ward areas within Moira. It was noted that the current figures suggest that sufficient provision already exists in the area. Following lengthy discussion members agreed the PEG was not in a position to support the proposal as it felt that the numbers in the Case for Change would not sustain a 26 place nursery unit and displacement of existing provision would occur.

## **Minutes of the EA Education Committee 9 November 2017**

### **8.10 DEVELOPMENT PROPOSAL NO 518 - OAKWOOD INTEGRATED PRIMARY SCHOOL**

Proposal to establish a grant maintained nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter ██████████ presented the papers\* (E/11/17/8.10) for publication and provided a summary of key areas for the Committee's consideration including that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, the EA had undertaken formal consultation with the Board of Governors and Trustees of schools which might be affected by the proposal. Members considered the Case for Change. This included the rationale for the proposal, the sustainability of the school, the impact of the proposal on schools in the locality and the response received to the consultation process. They noted that PEG had supported the proposal on the basis that the current PEG funded pre-school provider operating at the school site would close and would be replaced by a nursery unit attached to the primary school. No new pre-school provision would be added into the area. Members considered the comments set out in the draft EA Response to the Department of Education. On the proposal of ██████████, seconded by ██████████, the Committee approved the Response\* (Appendix D) for submission to DE along with the publication of the Proposal.

### **8.11 DEVELOPMENT PROPOSAL NO 523 - DRUMLINS INTEGRATED PRIMARY SCHOOL**

Proposal to establish a grant maintained nursery unit for 26 part time pupils with effect from 1 September 2018 or as soon as possible thereafter ██████████ presented the papers\* (E/11/17/8.11) for publication and provided a summary of key areas for the Committee's consideration including that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, the EA had undertaken formal consultation with the Board of Governors and Trustees of schools which might be affected by the proposal. Members considered the Case for Change. This included the rationale for the proposal, the sustainability of the school, the impact of the proposal on schools in the locality and the four responses received to the consultation process. They noted that PEG had reported that it would not support the proposal as it would have a negative impact on existing preschool provision in the area. In addition, PEG had stated that the existing providers were not operating at full capacity and if an increased demand for pre-school places presented in the future, the existing provision could be increased. 9 Members considered the comments set out in the draft EA Response to the Department of Education. A Member referred to a letter from DE dated 31 October 2017 on the implications of the statutory duty for integrated education in relation to pre-school provision at integrated primary schools. The letter stated that it was important that the EA and PEG supported DE 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. Members sought clarity on how this guidance should be

addressed within the EA response. Some Members queried whether the process should be delayed so as to give due regard to the letter. ██████ said that officers had not yet had the opportunity to consider the letter and provide advice to Members. The Chair referred to the role of the EA as planning authority to publish the Development Proposal. He also referred to the guidance which was being sought from DE on how the various pieces of legislation should be addressed in EA responses. A Member also referred to EA's duties in this regard: to publish the Development Proposal, to consult with schools that might be affected by the proposal, to consider the impact of any proposal and to submit its comments to DE for final consideration. ██████ outlined PEG's recommendation in respect of this proposal. The Chair of the Board said that the letter should be directed to Board Members and guidance provided on how it impacted on the Board's decision making. A Member received confirmation that the DE letter would be forwarded to all Board Members. On the proposal of ██████, seconded by ██████, the Committee approved the Response\* (Appendix D) for submission to DE along with the publication of the Proposal.

**Action:** DE letter dated 31 October 2017 to be forwarded to all Board Members; advice to be provided to Members on the implications of this letter on the Board's decision making.

### **8.12 DEVELOPMENT PROPOSAL NO 535 - ROWANDALE INTEGRATED PRIMARY SCHOOL**

Proposal to establish a 26 place part-time nursery unit with effect from 1 September 2018 or as soon as possible thereafter ██████ presented the papers\* (E/11/17/8.12) for publication and provided a summary of key areas for the Committee's consideration including that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, the EA had undertaken formal consultation with the Board of Governors and Trustees of schools which might be affected by the proposal. Members considered the Case for Change. This included the rationale for the proposal, the sustainability of the school, the impact of the proposal on schools in the locality and the three responses received to the consultation process. They noted that PEG had reported to state that the proposal would have a negative impact on existing pre-school provision in the area. In addition, the existing providers were not operating at full capacity and if an increased demand for pre-school places presented in the future, the existing provision could be increased. 10 Members considered the comments set out in the draft EA Response to the Department of Education. The comments raised by Members during discussion of DP No 523 (Drumlins Integrated Primary School) in respect of the DE letter dated 31 October 2017 also related to this proposal. On the proposal of ██████, seconded by ██████, the Committee approved the Response\* (Appendix D) for submission to DE along with the publication of the Proposal. (██████ left the meeting at 3.43 pm.) A Member referred to previous consideration given by the Committee to development proposals for pre-school provision attached to controlled primary schools. He asked that an exercise be carried out to detail those nursery units, attached to a controlled primary school, which did not proceed or were not approved over the past 18 months approximately. This was agreed.

**Action:** Exercise to be carried out on those nursery units, attached to a controlled primary school, which did not proceed or were not approved over the past 18 months approximately.

## **Minutes of the EA Education Committee 11 January 2018**

### **9. AREA PLANNING 9.1 DE LETTER DATED 31 OCTOBER 2017 – PRE-SCHOOL EDUCATION AND THE STATUTORY DUTY TO ENCOURAGE AND FACILITATE INTEGRATED AND IRISH MEDIUM EDUCATION**

The Committee noted that Mr Boyd's letter\* (E/1/18/9.1) dated 7 December 2017 to the Deputy Secretary was a combined response from both the Education and Children and Young People's Services departments. It also noted that a response was still awaited from DE. Members highlighted the urgency of receiving guidance from DE in this area given that the EA had been asked to implement what appeared to be a significant change in approach to pre-school provision. They noted that Development Proposals were coming forward for consideration which would be impacted by DE's letter of 31 October 2017. The Chair of the Board said that the matter would be raised at the next GAR meeting with the Permanent Secretary. A report on that discussion would be provided to the Committee at its February meeting.

**Action:** Seek clarity at the GAR meeting on the nuances of DE policy and report back to the Committee at its February meeting

## **PEG meeting 29 January 2018 minutes**

Extract

### **1. PRE-SCHOOL EDUCATION AND THE STATUTORY DUTY TO ENCOURAGE AND FACILITATE INTEGRATED AND IRISH MEDIUM EDUCATION**

A number of DE officials (Cathy Galway, Oliver McKearney, Suzanne Kingon, and Alison Chambers) joined the meeting to provide clarity in respect of Pre-school Education and the statutory duty to encourage and facilitate Integrated and Irish Medium Education (ref correspondence from Tommy O'Reilly dated 31st October 2017 and 15th January 2018).

Following an overview of recent case law and the application of the statutory duty, clarity was sought by members around:

- i. potential displacement of other pre-school provision;
- ii. application of the duty to non-statutory 'integrated' playgroups (i.e. on Integrated school grounds or which clearly feed into Integrated schools); and
- iii. what constitutes 'demonstrated parental demand'?

In regard to point (i), DE officials clarified that displacement should be avoided, where possible, but that statutory duty would take precedence.

In regard to point (ii), DE officials clarified that the statutory duty applies only to controlled integrated and grant-maintained integrated primary schools and not to other settings, however, in the spirit of promoting and facilitating, consideration should be given to PSEP funding for these settings where there is demonstrated parental demand.

In regard to point (iii), DE officials clarified that it would not be possible to provide the PEG with a single definition of what constitutes 'demonstrated parental demand'.

Following departure of the DE officials, and in light of the clarity provided around statutory duty, PEG members considered a number of development proposals from the Integrated Sector, including:

- Millstrand IPS
- Enniskillen IPS
- Rowandale IPS
- Drumlins IPS

After lengthy discussion and consideration of the DPs, into the early evening, PEG members agreed that further consideration should be given to the measurement of 'demonstrated parental demand' before an informed decision could be made. It was concluded that an emergency meeting could be called before the next PEG meeting, if necessary, to discuss development proposals and members will be notified accordingly.

## 2. DEVELOPMENT PROPOSALS

### Gaelscoil Neachtain

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward area. It was noted that 21 funded places are currently available within Naiscoil Neachtain. Following lengthy discussion members agreed to support the proposal.

## Extract of Minutes of the EA Education Committee 8 February 2018

### 4.3 PRE-SCHOOL EDUCATION AND THE STATUTORY DUTY TO ENCOURAGE AND FACILITATE INTEGRATED AND IRISH MEDIUM EDUCATION

██████████ said that DE officials had attended the most recent meeting of the Pre-School Education Group (PEG) to outline DE's position with regard to encouraging and facilitating Integrated and Irish medium education in the pre-school sector. The chair of PEG had asked DE to formalise its position in writing. ██████████ said that this communication, once received from DE, would be presented to the Children and Young People's Services Committee for consideration. It was agreed that the DE correspondence would also be presented to the Education Committee for consideration. ██████████ advised that the GAR meeting, to be held on 6 February, had been postponed to 21 February. An update on the discussion involving pre-school education at the GAR meeting would be provided to Members at a subsequent meeting. ██████████ re-entered the meeting at 1.20 pm. A Member indicated that the DE letter dated 15 January 2018 on pre-school education had been more explicit about the inherited requirement on NDPBs to support Integrated and Irish medium education. He was content however that the Committee should await further correspondence from DE on this matter. A Member said that DE's letter of 15 January 2018 was its interpretation of the law. He suggested that Mr Collings should seek his own independent legal advice on the matter. Mr Collings took this comment on board.

**Action:** The DE correspondence, when received, to be considered by the Education Committee as well as the Children and Young People's Services Committee.

## Extract of extraordinary meeting of PEG 27 February 2018

## 3. DEVELOPMENT PROPOSALS

██████████ provided members with a brief overview of the statutory duty to encourage and facilitate Integrated and Irish Medium Education and the clarification provided to PEG members by DE officials at the January meeting as follows:-

Following an overview of recent case law and the application of the statutory duty, clarity was sought by members around:

- iv. potential displacement of other pre-school provision;

- v. application of the duty to non-statutory 'integrated' playgroups (i.e. on Integrated school grounds or which clearly feed into Integrated schools); and
- vi. what constitutes 'demonstrated parental demand'?

In regard to point (i), DE officials clarified that displacement should be avoided, where possible, but that statutory duty would take precedence.

In regard to point (ii), DE officials clarified that the statutory duty applies only to controlled integrated and grant-maintained integrated primary schools and not to other settings, however, in the spirit of promoting and facilitating, consideration should be given to PSEP funding for these settings where there is demonstrated parental demand.

In regard to point (iii), DE officials clarified that it would not be possible to provide the PEG with a single definition of what constitutes 'demonstrated parental demand'.

██████████ outlined that further guidance was sought regarding demonstrated parental demand and the following are measures that may be considered on a case by case basis;

- 1<sup>st</sup> preference applications (if applicable)
- Current P1 intake and overall size of school
- Trend data on P1 intake and school enrolment
- Other Integrated provision in the area
- Expressions of interest.

██████████ enquired if the Shared Education Act would have an impact on the statutory duty and it was agreed this should be included as part of the PEG comment. It was also clarified that consultation needs to be undertaken with all non-statutory pre-school providers in the relevant local areas affected by the DPs.

Members considered each of the development proposals for comment on a case by case basis 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:

"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".

### **Mill Strand Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward/cluster area.

In this context, PEG supported the DP on the basis of demonstrated parental demand as evidenced by:

- the number of 1<sup>st</sup> preference applications (50 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.

However, PEG expressed strong concerns in regard to the potential impact of this additional provision as follows:-

- Potential displacement of existing funded pre-school provision in the area. Some non-statutory settings are operating with already low numbers and additional provision may affect their sustainability.
- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds.
- Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education.

### **Enniskillen Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward/cluster area.

In this context, PEG supported the DP on the basis of demonstrated parental demand as evidenced by:

- the number of 1<sup>st</sup> preference applications (43 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.

However, PEG expressed strong concerns in regard to the potential impact of this additional provision, including:-

- Potential displacement of existing funded pre-school provision in the area.
- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds. Enniskillen Nursery School is currently admitting 7 younger children in the 2017-18 academic year and there is potential that this will increase further.
- 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. Within the former Fermanagh DC area a total of 22 non-statutory settings are being funded for approximately 472 places and 10 statutory settings for approximately 364 places.

### **Rowandale Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward/cluster area.

In this context, PEG supported the DP on the basis of demonstrated parental demand as evidenced by:

- the school currently has a non-funded playgroup on the school grounds.
- overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 26 place nursery unit would be sustainable.

However, PEG expressed strong concerns in regard to the potential impact of this additional provision, including:-

- Potential displacement of existing funded pre-school provision in the area. Some non-statutory settings are operating with already low numbers and additional provision may affect their sustainability.
- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds (Maghaberry Nursery Unit has admitted 6 younger children in September 2017).
- Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education.

### **Drumlins Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward/cluster area.

In this context, PEG supported the DP on the basis of demonstrated parental demand as evidenced by overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 26 place nursery unit would be sustainable.

However, PEG expressed strong concerns in regard to the potential impact of this additional provision, including:

- Potential displacement of existing funded pre-school provision in the area. The P1 children attending Drumlins IPS are currently accessing pre-school provision across a range of settings and additional pre-school provision may have significant negative impact on the following settings:-

St Patrick's (Magheradroll) NU	8
Ballynahinch PS NU	2
Dromara PS NU	1
Fairhill PS NU, Dromara	1
Drumaness Playgroup	5



Anahilt Pre-School	2
Safe and Sound (Private Daycare)	3
Rockmount (Private Daycare)	5

- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds (A total of 7 younger children have been admitted to Magheradroll Nursery Unit in Sept 2017).
- Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education.

## **Extract of Minutes of the EA Education Committee 8 March 2018**

### **8.4 DEVELOPMENT PROPOSAL NO 523 - DRUMLINS INTEGRATED PRIMARY SCHOOL**

### **DEVELOPMENT PROPOSAL NO 535 - ROWANDALE INTEGRATED PRIMARY SCHOOL**

The Chair said that officers were awaiting further clarification from DE with regard to encouraging and facilitating Integrated and Irish medium education in the pre-school sector. This information, once received from DE, would be presented to the Children and Young People's Services Committee and the Education Committee and would facilitate further consideration of Development Proposals Nos 523 and 535.

## **Extract of Minutes of the EA Board on 29 March 2018**

### **14.2 DEVELOPMENT PROPOSALS**

The Education Committee, at its meeting on 9 November 2017, had considered the following proposals. The Committee had supported the Pre-school Education 11 Group's (PEG) assessment of both proposals at that meeting, ie PEG was not in a position to support the proposals as they would displace existing provision. The Board, at its meeting on 23 November 2017, had approved the minutes of the Education Committee. Both proposals had been published in November 2017 and EA's comments on both proposals had been submitted to DE.

#### **14.2.1 DP 523 - Drumlins Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter

#### **14.2.2 DP 535 - Rowandale Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter

██████████ presented the papers\* (EAB/3/18/12.2.1 and EAB/3/18/12.2.2) individually for both proposals. This included the Case for Change for each and PEG's revised comments on the proposals following the receipt of DE's recent guidance with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector. ██████████ outlined that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, the EA had undertaken formal consultation with the Boards of Governors and Trustees of schools which might be affected by the proposals. He said that PEG had also sought clarity from DE in respect of DE's Early Years' Learning to Learn Policy and had been advised that the Policy was broadly consistent with DE's correspondence with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector and was not exclusive. The Board noted PEG's revised position to both proposals in line with guidance provided by DE. It noted that PEG supported DP 523 on the basis of demonstrated parental demand as evidenced by overall enrolment trends at the school and the P1 intake over a number of years. It also noted that PEG supported DP 535 on the basis that the school currently had a non-funded playgroup on its grounds and

also because of the demonstrated parental demand, as evidenced by overall enrolment trends for the school. The Board also noted, however, that PEG had strong concerns with regard to the potential impact of each additional provision on existing funded pre-school provisions in the area and had asked that DE should take this into consideration when making a decision. ██████████ left the meeting temporarily at 5.02 pm. Members highlighted a number of risks in respect of supporting the two proposals. They expressed significant concerns that the two proposals could have serious impact on other sectors in the area, particularly the voluntary sector. They considered that DE, in its recent correspondence on the pre-school sector, was effectively pre-empting its decision in respect of these proposals irrespective of the Case for Change and without due regard to the rights and responsibilities of all sectors. They were concerned that DE's guidance on fulfilling the statutory duties to encourage and facilitate Integrated and Irish medium education as applied to pre-school could lead to the sectorisation of Early Years which traditionally had been non-sectoral. ██████████ recorded their dissent to the two proposals.

██████████ re-entered the meeting at 5.05 pm.

A Member said that the Drumragh judgment was relevant in that displacement had been found not to be an argument. A Member suggested that EA, in conjunction with CSSC, should review controlled sector provision across the region with a view to bringing forward proposals on a regional strategy for controlled pre-school provision. On the proposal of ██████████, seconded by ██████████, the Board agreed, in light of the number of risks, to pause in respect of commenting on the two proposals and to undertake an exercise, in conjunction with CSSC, to develop a strategy for controlled pre-school provision across the region. The Board further agreed to ask a DE official to attend a meeting of the Board to discuss this matter further.

**Action:** Board agreed to pause in respect of commenting on the two proposals and to undertake an exercise, in conjunction with CSSC, to develop a strategy for controlled pre-school provision across the region; and DE official to be asked to attend a meeting of the Board to discuss the matter further.

## **Extract of Minutes of the EA Education Committee 12 April 2018**

### **5.2 DEVELOPMENT PROPOSAL NO 523 - DRUMLINS INTEGRATED PRIMARY SCHOOL**

#### **DEVELOPMENT PROPOSAL NO 535 - ROWANDALE INTEGRATED PRIMARY SCHOOL**

██████████ said that the Board, at its meeting on 29 March 2018, had considered the two development proposals giving due regard to PEG's revised position on both proposals in line with DE's guidance around the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector. He outlined the concerns raised by Members at the Board meeting around the serious impact of the two proposals on other sectors in the area, particularly the voluntary sector. He said that Members had considered that DE, in its recent correspondence on the pre-school sector, was effectively pre-empting its decision in respect of these proposals irrespective of the Case for Change and without due regard to the rights and responsibilities of all sectors. Members had also been concerned at the Board meeting that DE's guidance on fulfilling the statutory duties to support, encourage and facilitate Integrated and Irish Medium Education as applied to preschool could lead to the sectorisation of Early Years which traditionally had been non sectoral. ██████████ said that the Board, at its meeting on 29 March 2018, had agreed to pause in respect of commenting on the two proposals and to undertake an exercise, in conjunction with CSSC, to develop a strategy for controlled pre-school provision across the region. The Board had also agreed to invite a DE official to attend a meeting of the Board to discuss this matter further. ██████████ said that he had discussed this issue with the Head of Legal Services following the Board meeting to convey the views of Board Members. The legal advice was that EA should submit the development proposals to DE, together with its views on the two proposals, in line with Article 79(1)(b) of The Education Reform (Northern Ireland) Order 1989; the EA view being that it did not support the two development proposals. The final decision with regard to approving or not approving development proposals resided with DE. ██████████ said that DE had advised that there was no inconsistency between applying the statutory duty to support and facilitate Integrated and Irish medium education in the pre-school sector with the principles set out in Learning to Learn Policy. Members acknowledged PEG's role in the area planning process. Members commented that nursery provision was non-sectoral. Some Members expressed serious concerns that DE's policy was

asking the EA to favour Integrated and Irish medium education over other sectors. A Member said that legislation was already in place, the issue had arisen because clarification had been sought. It was pointed out that the 1989 Order set out the statutory duty to encourage and facilitate Integrated and Irish medium education and give regard to demonstrated parental demand. ██████ advised that PEG had revised its position to support the two proposals on this basis and had added in a qualification to highlight its strong concerns with regard to the potential impact of the additional provisions on existing funded preschool provision in the area. A Member referred to the relevance of the Drumragh Judgment on the matter. 2 The Chair of the Board acknowledged that the Committee would not achieve consensus with regard to the two development proposals. ██████ proposed that the Board should forward PEG's comments on the two development proposals to DE along with EA's expression of support for both proposals. This proposal was seconded by ██████ proposed that the Board should again consider the two development proposals along with a paper setting out options available to the Board to take this matter forward. This proposal was seconded by ██████ withdrew his proposal. The Committee agreed that the Board should again consider the two development proposals along with a paper setting out options available to the Board to take this matter forward. Action: DP Nos 523 and 535 to be presented to the Board at its meeting on 26 April 2018 for consideration along with a paper setting out options available to Members.

## **Extract of Minutes of the EA Board on 26 April 2018**

### **14.2 DEVELOPMENT PROPOSALS**

#### **14.2.1 DP 523 - Drumlins Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter

#### **14.2.2 DP 535 - Rowandale Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter ██████ presented the papers\* (EAB/4/18/12.1 and EAB/4/18/12.2) on the two proposals. This included the Case for Change on each proposal and PEG's revised comments on the proposals following the receipt of DE's recent guidance with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector. As requested by the Education Committee at its meeting on 12 April 2018, ██████ presented a paper\* (EAB/4/18/12.2) which summarised the legislative framework, the role of PEG, the timeline associated with the consideration given to the two proposals to date, the legal position regarding EA's role in commenting on development proposals, and options available to the Board to progress both proposals. ██████ reminded the Board that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, EA had undertaken formal consultation with the Boards of Governors and Trustees of schools which might be affected by the proposals. PEG had sought clarity from DE in respect of DE's Early Years' Learning to Learn Policy and had been advised that the Policy was broadly consistent with DE's correspondence with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector and was not exclusive. He referred to PEG's revised position to both proposals in line with guidance provided by DE. He pointed out that PEG supported DP 523 on the basis of demonstrated parental demand as evidenced by overall enrolment trends at the school and the P1 intake over a number of years. PEG also supported DP 535 on the basis that the school currently had a nonfunded playgroup on its grounds and also because of the demonstrated parental demand, as evidenced by overall enrolment trends for the school. He referred to PEG's concerns with regard to the potential impact of each additional provision on existing funded pre-school provisions in the area which had led PEG to ask that DE should take this into consideration when making a decision.

██████ left the meeting at 4.25 pm.

██████ referred to the consideration given to this matter at the Board meeting on 29 March and the Education Committee meeting on 12 April and to the risks 7 raised by Members in respect of supporting the two proposals. Members had been unable to come to a consensus in respect of a way forward on the two

proposals. He said that an invite had been issued to DE for an official to attend a meeting of the Board to discuss this matter. He said that the Board had agreed, at its March meeting, to undertake an exercise in conjunction with CSSC to develop a strategy for controlled pre-school provision across the region. He confirmed that initial engagement on this issue had taken place with CSSC. A Member referred to the legal position and EA's role in commenting on development proposals. [REDACTED] said that the Head of Legal Services was in the process of exploring further DE's interpretation on the statutory duty around pre-school provision. A Member commented on the relevance of the Drumragh Judgment on the matter. A Member said that the concerns raised in respect of the two development proposals related to DE's policy on requiring the EA to favour Integrated and Irish medium education over other sectors. He highlighted that Members were aware that DE's policy direction could have serious consequences on the voluntary sector and he referred to the reliance of EA on the voluntary sector to deliver pre-school provision across the region. On the proposal of [REDACTED], seconded by [REDACTED], the Board agreed to defer consideration of this matter until the May Board meeting. The Board also agreed that officers would engage with NICIE as well as with CSSC on the matter and that further engagement would also take place with DE with regard to policy.

**Actions:** DPs 523 and 535 to be further considered by the Board at its May meeting; officers to engage with NICIE as well as with CSSC on the matter and to further engage with DE with regard to policy.

## **Extract of the Minutes of the Children and Young People's Services Committee**

### **3 May 2018**

#### **9 Pre-school Education Group – Minutes of Meetings**

##### **9.1 Meeting held on 29 January 2018**

The Committee noted the minutes\* (CYPS/5/18/11.1) of the Pre-school Education Group (PEG) meeting which had been held on 29 January 2018. A discussion ensued on the statutory duty to encourage and facilitate Integrated and Irish Medium Education. It was noted that the Department of Education had advised PEG that, following recent case law, statutory duty would take precedence over potential displacement of other pre-school provisions. The matter of demonstrated parental demand was also discussed. A Member referred to the inclusion of three new providers in the Pre-School Education Programme for one year only. It was clarified that, in considering new requests, PEG normally provided approval for one year.

##### **9.2 Meeting held on 27 February 2018**

The Committee noted the minutes\* (CYPS/5/18/11.2) of the PEG meeting which had been held on 27 February 2018. Members further noted that PEG had sought guidance from the Department of Education (DE) regarding the need to consider statutory duty and demonstrated parental demand. The following measures had been considered by PEG on a case by case basis to assess parental demand:

- First preference applications (if applicable);
- Current P1 intake and overall size of school;
- Trend data on P1 intake and school enrolment;
- Other integrated provision in the area; and
- Expressions of interest.

A Member was of the view that PEG had changed its processes following receipt of guidance from DE. He asked for officers to seek advice on whether the new process was discriminatory against other sectors. Mrs Ward undertook to explore this issue further.

**Action:** Officers to seek advice on new process to consider Development Proposals.

# Extract from the minutes of the Education Committee 10 May 2018

## 5. MATTERS ARISING FROM THE MINUTES

### 5.1 DEVELOPMENT PROPOSAL NO 523 - DRUMLINS INTEGRATED PRIMARY SCHOOL DEVELOPMENT PROPOSAL NO 535 - ROWANDALE INTEGRATED PRIMARY SCHOOL (5.2)

The Chair said that the Board, at its April meeting, had considered the two proposals and had agreed that the matter should be considered again at its May meeting. Members again expressed serious concerns that DE's guidance on fulfilling statutory duties to encourage and facilitate Integrated and Irish medium education, as applied to pre-school, could lead to the sectorisation of early years which traditionally had been nonsectoral. They considered that, in effect, DE was asking EA to favour Integrated and Irish medium education sectors over other sectors. Members highlighted the importance of the EA, as the planning authority, giving due regard to the rights and responsibilities of all sector. Members discussed pre-school provisions in various communities and highlighted that these provisions developed to represent, in the vast majority of cases, the needs of those communities. The Committee requested information on the historical context of pre-school provision, the number of voluntary and statutory provisions across the region, and the composition of pre-school provisions to enable an evidenced based analysis to be carried out on the integrated (non-sectoral nature) of pre-school provision. Members discussed PEG's role as an advisory body and the criteria used by PEG in coming to a position to support Development Proposal Nos 523 and 535. A Member highlighted the importance of identifying a clear process which would set out how EA measured need in an area and the impact of any proposal. He considered that DE's guidance had conflated the issue around Integrated and Irish medium education. In the Irish medium sector, the approach was identifiable for pre-school in that children were immersed in a different style of learning through the Irish language. The Integrated model however would require a process, which was robust, fair and legally compliant, to identify need and impact. On the proposal of ██████████, seconded by ██████████, the Committee agreed to recommend that EA should commence work to enhance the area planning process through the identification of a model, which was robust, fair and legally compliant, to take forward Development Proposals.

██████████ re-entered the meeting at 2.25 pm.

The Chair commented that issues relating to PEG and governance would require to be considered by the Children and Young People's Services Committee. ██████████ said that the criteria used by PEG to consider its position on the two Development Proposals had been impacted by DE's recent guidance. Following a meeting with DE officials on this issue, PEG had revised its position to support both proposals and had stated that it had taken account of demonstrated parental demand as evidenced by enrolment numbers. PEG had also however highlighted strong concerns with regard to the potential impact of the two proposals on existing funded pre-school provisions. A Member received clarification on the definition of demonstrated parental demand. Members said that DE's guidance would create displacement and could significantly add to financial pressures within Education. Some Members indicated that they were not in a position to support the two proposals on account of equality considerations. A Member asked for legal advice to be taken. Mr Boyd said that DE had stated its position and would rely on case law. The Chair of the Board said that these challenges should be clearly articulated to DE in order to expedite matters as quickly as possible. She was mindful of the expectations of the Boards of Governors of Drumlins and Rowandale Integrated Primary Schools and referred to two further development proposals to be considered later in the meeting on the same issue. A Member asked for information to be provided to the Committee on the number of occasions CCMS had brought forward a development proposal for the establishment of a statutory provision which had not been supported by EA. This information would be provided to the Committee. ██████████ left the meeting temporarily at 2.47 pm. ██████████ said that, in developing a model to enhance the area planning process, it would be beneficial for the Committee to receive information on the financial impact of a development proposal being approved. Information could be set out to identify the individual financial impact and the cumulative impact over the course of a year. Ms O'Connor re-entered the meeting at 2.50 pm. The Committee agreed that a consensus view, at this time, could not be reached on Development Proposal Nos 523 and 535. ██████████ and ██████████ left the meeting temporarily at 2.51 pm.

**Actions:** A full review of the area planning process through the identification of a model which is robust, fair and legally compliant, to be taken forward in preparation for the next three year strategic plan. In developing the model, better management information to be provided to the Committee on the financial impact of development proposals, both individually and cumulatively. Committee to receive information on the historical context of pre-school provision, the number of voluntary and statutory provisions across the region, and the composition of pre-school provisions to enable an evidenced based analysis to be carried out on the integrated (non-sectoral nature) of pre-school provision. Information also to be provided on the number of occasions CCMS has brought forward a 4 development proposal for the establishment of a statutory provision which has not been supported by EA.

## **Extract from the minutes of the PEG Committee 23 May 2018**

### **11 DEVELOPMENT PROPOSALS**

#### **Bridge Integrated PS**

██████████ referred members to the Case for Change and associated documents circulated with the papers (see attached) including statistics on pre-school provision within the ward/cluster area.

In this context, PEG supported the DP on the basis of demonstrated parental demand as evidenced by overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 26 place nursery unit would be sustainable.

However, PEG noted strong concerns in regard to the potential impact of this additional provision, including:

- Potential displacement of existing funded pre-school provision in the area. The P1 children attending Bridge IPS are currently accessing pre-school provision across a range of settings and additional pre-school provision may have significant negative impact on the following settings:-

Downshire Nursery School	13
Little Friends PG	10
Banbridge Nursery School	6
Ladybird Lane PG	5
Child's Play Day Nursery	6
Humpty Dumpty Pre-School	*
Dromore Nursery School	*
Ballydown Nursery Unit	*
Laurencetown Pre-school	*
- Potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds.
- Impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate.

## **Extract of Minutes of the EA Board on 31 May 2018**

### **14.2 DEVELOPMENT PROPOSALS DP 523 - Drumlins Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter

#### **DP 535 - Rowandale Integrated Primary School**

Proposal to establish a new nursery unit for 26 children on a part time basis with effect from 1 September 2018 or as soon as possible thereafter ██████████ presented the papers\* (EAB/5/18/12.2) associated with

the two proposals. This included the Case for Change on each proposal and PEG's revised comments on the proposals following the receipt of DE's recent guidance with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector. ██████ also presented a paper\* (EAB/5/18/12.2) which summarised the legislative framework, the role of PEG, the timeline associated with the consideration given to the two proposals to date, the legal position regarding EA's role in commenting on development proposals, and options available to the Board to include within a response to DE. ██████ reminded the Board that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, EA had undertaken formal consultation with the Boards of Governors and Trustees of schools which might be affected by the proposals. She said that PEG had sought clarity from DE in respect of DE's Early Years' Learning to Learn Policy and had been advised that the Policy was broadly consistent with DE's correspondence with regard to the statutory duty to encourage and facilitate Integrated and Irish medium education in the pre-school sector and was not exclusive. She referred to PEG's revised position to both proposals in line with guidance provided by DE. She pointed out that PEG supported DP 523 on the basis of demonstrated parental demand as evidenced by overall enrolment trends at the school and the P1 intake over a number of years. PEG also supported DP 535 on the basis that the school currently had a nonfunded playgroup on its grounds and also because of the demonstrated parental demand, as evidenced by overall enrolment trends for the school. She highlighted PEG's concerns with regard to the potential impact of each additional provision on existing funded preschool provisions in the area which had led PEG to ask that DE should take this into consideration when making a decision. Members acknowledged the consideration that had been given to the two Development Proposals over a period of months as the Board had been unable to come to a consensus in respect of a way forward. ██████ re-entered the meeting at 4.08 pm. A Member highlighted that EA needed to be mindful of addressing the resource implications of proposals. A Member said that the proposal for Drumlins IPS was not dissimilar in size to what was already provided by a neighbouring controlled and maintained school. He said that the proposal for Rowandale IPS was not displacement but was a natural progression to a statutory provision in line with what was available at neighbouring schools. He highlighted the strong parental support for both Development Proposals. ██████ re-entered the meeting at 4.11 pm. 10 A Member outlined EA's statutory responsibilities. She said that, in highlighting concerns over resource implications of proposals, EA should take the same approach in respect of all proposals coming forward for pre-school provision and not just relating to integrated education. She urged caution in prioritising one form of education provision over another. ██████ pointed out that EA would be required to meet recurrent costs associated with statutory provision. While the initial capital costs for both proposals would be approximately £300k, this would most likely be met from Fresh Start funding. She outlined the recurrent financial consequences of both DP 523 and DP 535 in terms of pupil costs. There was an additional cost of £57 per pupil in a statutory provision as opposed to a private setting. A Member said that schools with statutory nursery units would carry significant deficits should they be unable to fill all places. ██████ indicated that, in such cases, schools often offered places to underage pupils to fill places. Some Members commented that DE's letter was applying criteria to pre-school provision that had not been applied before. This inevitably would change the balance of provision in the pre-school sector and was likely to impact most on the voluntary sector. They drew attention to the reliance of EA on the voluntary sector to deliver pre-school provision across the region which was already naturally integrated or non-sectoral in nature. A Member queried if proposals had come forward from the controlled sector which had displaced provision within the voluntary sector. He queried the circumstances under which the Board would now support a proposal for integrated pre-school provision. On the proposal of ██████, seconded by ██████, it was agreed to recommend that a response would be provided as follows to DE on DP 523 and DP 535:

- The Board noted the guidance provided by DE on this matter and noted the recommendations from PEG.
- The Board was unable to come to a consensus regarding its support or otherwise. While there was a broad level of support among Board Members for a particular position, it was not unanimous.
- The Board was concerned that the implementation of this proposal would result in increased costs for pre-school provision which was already in excess of demand.
- The Board would be undertaking a full review of the area planning process through the identification of a model which was robust, fair and legally compliant, to be taken forward in preparation for the next three year strategic plan.

- The Board would be engaging with NICIE and CCMS in order to take forward such a process.
- The Board would issue a letter to DE to accompany its response to the two proposals. The letter would emphasise the Board's commitment to supporting Integrated education. It would emphasise the broad level of support among Board Members for this particular position but that it was not unanimous. It would set out the Board's concerns about the way in which DE was applying criteria to pre-school provision that had not been applied before and the method by which the Board's independent view was being challenged. The letter would request a meeting between the Board and DE officials on this matter.

██████████ indicated that the Education Committee had already agreed that officers would meet with CCMS and NICIE representatives.

**Action:** Letter to be drafted for issue to DE alongside EA's submission on DP 523 and DP 535 setting out an inconclusive decision and the Board's concerns in respect of the matter.

## **Extract from the minutes of the Education Committee 13 September 2018**

**10.5 DEVELOPMENT PROPOSAL NO 563 - BRIDGE INTEGRATED PRIMARY SCHOOL** Proposal to establish a single pre-school nursery unit with 26 part time places with effect from 1 September 2019 or as soon as possible thereafter

██████████ presented the papers\* (E/9/18/9.5) for publication and provided a summary of key areas for the Committee's consideration including that, in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, the EA had undertaken formal consultation with the Board of Governors and Trustees of schools which might be affected by the proposal.

Members considered the Case for Change. This included the rationale for the proposal, the sustainability of the school, the impact of the proposal on schools in the locality, and responses received within the consultation process. In light of DE's guidance on the statutory duty to encourage and facilitate Integrated education in the pre-school sector, PEG had supported the proposal on the basis of demonstrated parental demand as evidenced by overall enrolment trends for the school and the year 1 intake over a number of years. Members also noted that PEG had expressed strong concerns that the additional provision could potentially displace existing funded pre-school provision in the area. PEG had also stated that the proposal had potential to increase the uptake of younger children into statutory nursery settings with a consequent increased cost on public funds and it had potential to impact on existing cross community provision in respect of the duty to promote, encourage and facilitate.

The Committee noted that in June 2017 DE had not approved Development Proposal No 487 to establish a single part time nursery unit at Bridge Integrated Primary School. DE had stated in June 2017 that while it had been mindful of its duties to encourage and facilitate the development of integrated education, the data on enrolments and demand had not provided sufficient evidence for a need for additional pre-school provision in the area and consequently the proposal had potential to displace current good quality provision.

Members considered EA's draft response to the proposal as set out in the summary paper. It was recommended that EA would concur with PEG's assessment in light of DE's guidance around the statutory duty to encourage and facilitate Integrated education in the pre-school sector and that it would also support PEG's strong concerns around the additional provision.

On the proposal of ██████████, seconded by ██████████, the Committee agreed to recommend the response for submission to DE subject to an amendment that EA noted DE's decision in June 2017 and the terms of DE's decision on the proposal to establish a single part time nursery unit at the school. The Committee agreed to publish the Development Proposal.



(ii) CSSC



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23 October 2018

**RE: Development proposal no 563 – Bridge Integrated Primary School**

Dear sir/madam

**CSSC Response**

The Controlled Schools' Support Council (CSSC) has consulted with schools in the controlled sector in respect of development proposal 563 (DP 563). CSSC recognises the potential for this proposal to impact on the sustainability of controlled schools in the area and welcomes the opportunity to make comment in this context.

CSSC welcomed the Department of Education's decision in June 2017 not to approve development proposal 487 to establish a single pre-school nursery unit with 26 part-time places at Bridge Integrated Primary School. This decision was based on evidence which did not support the proposed addition of 26 part-time statutory nursery places. The Permanent Secretary commented, "I am mindful of the statutory duty placed on the Department to encourage and facilitate the development of integrated education. However, the data on enrolments and demand do not sufficiently evidence the need for additional preschool provision in the area, and indeed there is already over provision of pre-school places. Consequently the Development Proposal had the potential to displace current good quality provision." (Development proposal submission, Department of Education, June 2017)

CSSC recognises the statutory duty placed on the Department to encourage and facilitate the development of integrated education and appreciates that this must be balanced with its 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.

The case for change states that the establishment of a new nursery unit would require investment of £300,000 for accommodation and £48,000 for staffing. Controlled schools throughout Northern Ireland are keenly feeling the effects of reduced budgets and in many of these schools the need for refurbishment is escalating. As there is no evidenced need for additional pre-school places in the Banbridge area, CSSC must emphasise their grave concerns at the resource implications of this proposal. The Education Authority (EA) has also raised concerns that the implementation of this proposal will result in increased costs for the existing provision which is already in excess of demand.

Attention is drawn in the case for change to Recommendation 6 of 'the Independent Review of Integrated Education' which states, 'that where clear demand is demonstrated, integrated pre-school provision (an integrated nursery or any pre-school linked directly to an integrated primary school) should receive funding and additional places even where

there are unfilled pre-school places in other providers in the area,' This recommendation is untenable in the current economic climate.

The Pre-School Education Group (PEG), in response to the pre-publication consultation, indicates that PEG supports the development proposal in the context of specific guidance provided by DE. CSSC notes that the Department has drawn to the attention of the statutory planning authorities the need to support DE in the fulfilment of the duty to encourage and facilitate integrated education, highlighting the role that the Education Authority and the PEG should play in striving to meet demonstrated parental demand in an area for pre-school education at integrated primary schools. CSSC notes that PEG has, in this context, interpreted parental demand as being demonstrated by overall enrolment trends for the school and the P1 intake over a number of years, 'which would suggest that a 26 place nursery unit would be sustainable.'

Council has concerns in respect of what is considered to be sufficiently robust and verifiable evidence of high levels of 'demonstrated parental demand' for integrated pre-school provision. Can it be determined with confidence that the overall enrolment trends and the P1 intake for the school warrant the additional provision proposed? The Case for Change states that the school has recently gathered Expressions of Interest in relation to this proposal, 20 of these are relevant to the 2019 intake year and 16 for the 2020 intake year. The school has also carried out a survey of its parents in which 98% of respondents were in support of a Nursery Unit at Bridge IPS. The CSSC would contend that the fact that the respondents to this survey are parents of pupils enrolled at Bridge Integrated Primary School has the likelihood of engendering a response bias.

CSSC notes the strong concerns expressed by PEG in regard to the potential displacement of existing funded pre-school provision in the area as a result of this additional provision. The Case for Change demonstrates that 74.8% of children who attend Bridge Integrated Primary School live within a two mile radius of the school and 86.6% reside within a 3 mile radius. Downshire Nursery School, Ballydown Nursery Unit and Banbridge Nursery School are all situated within a two mile radius of Bridge Integrated Primary School. Furthermore, there are five voluntary pre-school providers within a two mile radius of Bridge Integrated Primary School and another located within a three mile radius. This is a strong indicator that the intake of these nine pre-school providers would most likely be affected. The case for change provides information on the pre-school experience of the P1 children of Bridge Integrated Primary School in 2016/17 and 2017/18. A substantial number, 18 in 2016/17 and 13 in 2017/18, attended Downshire Nursery School.

CSSC recognises that the proposal has the potential to displace not only existing pre-school provision but also the intake of pupils transitioning from pre-school to P1 in the area. If parents avail of a pre-school education at Bridge Integrated Primary School they will be less likely to transition to another primary school thereby enhancing the sustainability of provision at Bridge Integrated Primary School yet jeopardising the sustainability of neighbouring schools.

DE has provided guidance to the Education Authority (EA), in relation to the allocation of pre-school places highlighting 'the need to allocate places to ensure optimum use of existing provision to minimise the potential for underage children to be enrolled.' The PEG has raised concerns that this development proposal has the potential to lead to an increased uptake of younger children into statutory nursery settings and this will lead to an increased cost on public funds. Notably Dromore Nursery School in 2017/18 accepted 13 younger children thereby demonstrating that there is no need for additional pre-school provision in this area. CSSC shares the concerns highlighted by PEG in this respect.

While the Case for Change suggests there is a shortfall in pre-school provision within the Banbridge town area the decision in respect of Development Proposal 487 confirmed that the data on enrolments and demand did not sufficiently evidence the need for additional provision (June 2017). The case for change highlights a shortfall of places at first preference, however, no family is assured of their first preference in applying for a pre-school education place. Linked to the argument that there is an unmet need for integrated pre-school provision in the area is reference within the case for change to approximately 10 of the 60 P1 intake in 2017/18 not having pre-school experience. CSSC would emphasise that as pre-school education is non-statutory and non-sectoral in nature parents are free to choose whether to avail of a pre-school education for their child/children or not.

In respect of the 18/19 data, 247 first preference applications were received for 252 funded places for September 2018. Furthermore the PEG confirms that existing voluntary and private providers are not currently operating to their maximum registration number and have spare capacity to address possible demand in the future.

The Case for Change states that the 0-15 year old population is predicted to grow by 9.6% in the Armagh, Banbridge and Craigavon Local Government District during the period 2014 to 2024, however, consideration of the projected live births for the specific wards which the school serves would be more appropriate in considering the demand for pre-school places. Projected live births for the former ward areas of Ballydown, Banbridge West, Edenderry, Fort, Seapatrick and The Cut demonstrate that the projected admissions do not exceed the number of available places in the area.

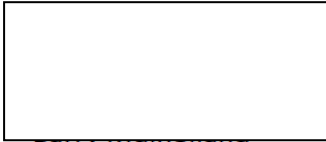
Much emphasis is placed in the Case for Change on the opportunity to establish 'formal' integrated statutory provision. CSSC is concerned that this emphasis on the lack of 'formal' integrated statutory provision undermines the non-sectoral nature of pre-school education. All pre-school provision in the area is inclusive, child centred and focused on educating children together in a culture of respect and mutual understanding.

Under the Shared Education Act (2016), DE has a duty to encourage, facilitate and promote shared education. This duty must also be balanced with the duty to encourage and facilitate the development of integrated education. CSSC is concerned that the establishment of additional nursery provision in integrated schools could threaten very successful and valued shared education programmes that currently exist. PEG also highlights these concerns and notes the potential impact of this additional provision on existing cross-community provision.



In summary, CSSC objects to development proposal 563 on the basis that there is no demonstrated need for the establishment of additional statutory nursery provision in this area. This proposal has the potential to displace existing quality pre-school education provision and increase the potential for underage children to be enrolled within established nursery settings. The CSSC is concerned in relation to the resource implications of the proposal, particularly given the serious financial challenges facing education in Northern Ireland at this time.

Yours sincerely



Chief Executive

(iii) **School Response**



Education Authority - Southern Region  
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PRINCIPAL: Mrs K Porter

4 October 2018

## **Governors' Response to Development Proposal 563 – Bridge Integrated Primary School**

Although the Governors of Banbridge Nursery School fully support the provision of high quality nursery education/pre-school places in the Banbridge Area, they object to this development proposal. Their reasons are listed below.

- Though not formally integrated, the ethos of Banbridge Nursery School is most definitely one of integration and inclusion. We are a child-centred school and our school community is made up of governors, staff and families from a variety of different sectors. We are in fact integrated by religion, faith, culture and lifestyle.
- After completion of the admissions procedure to nursery/pre-school in September 2017, no children who remained in the process were unplaced in the Banbridge area.
- The Governors expressed their concerns that the number of first preference applications to Banbridge Nursery School in January 2018 saw a decrease of four pupils from January 2017, with only one child being placed on our waiting list. In September, this child was offered a place and is now attending Banbridge NS in a full-time capacity. This decreasing trend was common across several other pre-school providers in the Banbridge area. If this trend is to continue, additional provision would, in all likelihood, displace current provision.
- The opening of another Nursery Unit is likely to have a detrimental impact on the voluntary and private providers in our area.
- Finally, the Governors are concerned that in light of the recent Area Planning developments, this proposed action may not be the best use of Department of Education funding and would ask for further clarification on the rationale for spending £300 000 for accommodation and £48 000 per annum for staff. Would it not be more prudent to invest in the existing Nursery Schools, Nursery Units and other pre-school settings in Banbridge?

The Board of Governors of Banbridge Nursery School object to development proposal 563 on the basis that there is no demonstrated area need for the establishment of a 26 place nursery unit at Bridge Intergrated Primary School, particularly given the serious financial challenges facing education in Northern Ireland at this time.

**DE (Policy Team) Comments**

<b>A</b>	<b>Financial Monitoring Team</b>
<b>B</b>	<b>School Admissions Team Comments</b>
<b>C</b>	<b>Inclusion and Wellbeing Directorate</b>
<b>D</b>	<b>Education Workforce Directorate</b>
<b>E</b>	<b>Curriculum Qualifications and Standards Directorate</b>
<b>F</b>	<b>Investment and Infrastructure Directorate</b>
<b>G</b>	<b>Early Years Team</b>
<b>H</b>	<b>Shared Education and Community Relations Team</b>

**A Financial Monitoring Team**

As a GMI school, the accounting arrangements differ from those of controlled or maintained schools and there is no available data on the school's carry-forward as 31 March 2018

The school received a total delegated budget of £1,193,128 in the 2018-19 financial year for 415 FTE pupils. This generates a per capita of £2,875\* which compares to an average for all primary schools of £2,978.

\* the school's delegated budget included £28,964 & £51,800 for Landlord Maintenance and Administrative costs factor funding respectively, not applicable for controlled or maintained schools.

All schools receive a delegated budget for the financial year (Apr18 to Mar19) on the basis of verified enrolments as at the October Census prior to the financial year (October 17).

Any new provision (including new Nursery units) opening during the year are a pressure for the Department's "New Schools & Units" fund. A new 26 P/T Nursery Unit is likely to create a funding need of around £32k – based on past costs for such units opening during the financial year – for the period from Opening to the end of that financial year. Full year costs to the Aggregated Schools Budget are likely to be c. £55k (for new provision, not previously funded).

**B School Admissions Team**

The approved enrolment and admissions numbers at Bridge Integrated Primary School (IPS) are 406 and 58 respectively. The school can admit up to 60 pupils in any year provided that this does not cause the school to exceed the overall approved enrolment number. The table below provides details of applications to Year One for the past five years;

School Year	Total Applications	Includes First Preference
2014/15	72	71
2015/16	62	61
2016/17	76	74
2017/18	80	71

During the above period SAT has not received any requests from Bridge IPS for a temporary variation (TV) to increase their admission or enrolment numbers. In 2017 SAT received correspondence from the parent of a pupil who had applied unsuccessfully for admission to Bridge IPS for the 2017/18 year. The school confirmed that they were oversubscribed for admissions to the school in September 2017 and that they did not intend to make an application for a TV. SAT advised the parent that in these circumstances it is neither possible nor appropriate for DE to intervene.

In 2017 the school wrote to SAT and requested a change to their admission number from 58 to 60. SAT advised the school that such a change would be regarded as significant i.e. this would equate to an increase to the school's enrolment of 14 pupils, and any significant change would require the publication and approval of a Development Proposal. The school were advised to contact NICIE if they wished to take this course of action.

### **C Inclusion and Wellbeing Directorate**

From a special educational needs (SEN) policy perspective, SET would have no objections to the DP, subject to the assurance that any impact on / provision for pupils with SEN will be considered and managed effectively.

### **D Education Workforce Directorate**

EWD has reviewed the Case for Change and noted the staffing implications for teaching and non-teaching staff.

In 2015 the Department provided funding for a teacher redundancy. Therefore should this proposal proceed the school must seek approval from the Department to increase the FTE at the school.

### **E Curriculum Qualifications and Standards Directorate (CQSD)**

Bridge Integrated PS was last inspected by the ETI in January 2012. The ETI reported that, in the areas inspected, the quality of education provided by the school was good. The school had important strengths in most of its educational and pastoral provision. The inspection identified areas for improvement which the school had demonstrated the capacity to address.

No issues/concerns have been identified, from a policy perspective, in respect of the development proposal by any of the CQSD policy teams.

### **F Investment Infrastructure Directorate**

As noted in the Case for Change the school does not currently have any pre-school provision, so if the DP were approved additional accommodation would be required (most likely in modular form as this provides value for money and decreased build time over a traditional brick build construction) The average cost of modular nursery accommodation is approximately £300k so the cost assumptions in the Case for Change are broadly accurate. Final costs would depend on ground conditions at the school, access to services etc.

Lead in times for installation of mobile accommodation is around 12 months from the date of approval to completion on site. Timescales will vary, dependant on ground conditions, procurement and the planning approval process. It is therefore very unlikely that any additional accommodation to facilitate the DP would be in place by September 2019.

If the DP is approved the preferred option for delivery will not be known until a full feasibility report is undertaken by the EA. Both the Case for Change and Accommodation Template note that the school site it is capable of housing a modular nursery unit and associated play area.

## **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. Conclusion**



## **INPUT FROM EARLY YEARS TEAM ON DEVELOPMENT PROPOSAL No 563**

**A SINGLE PRE-SCHOOL NURSERY UNIT WILL BE ESTABLISHED AT BRIDGE INTEGRATED PRIMARY SCHOOL TO PROVIDE 26 PART-TIME NURSERY PLACES WITH EFFECT FROM 1 SEPTEMBER 2019, OR AS SOON AS POSSIBLE THEREAFTER.**

### **1. INTRODUCTION**

At the request of the Board of Governors of Bridge Integrated Primary School, the Education Authority (EA) has published Development Proposal Number 563, proposing that a 26 place part-time statutory pre-school unit be established from 1 September 2019 or as soon as possible thereafter.

The Case for Change (CfC) states that the school does not currently have any pre-school education provision and proposes that a new nursery unit is established, for which additional accommodation would be required (CfC, page 29).

### **2. BACKGROUND**

A previous Development Proposal (DP No. 487) requesting statutory nursery provision at the setting was not approved in 2017. The CfC for the current Development Proposal seeks the same statutory nursery unit as previously requested, i.e. 26 part time statutory pre-school education places. The current proposal has been considered in the current context, and so reflects changes and updated information since DP No. 487, including changes to the pattern of pre-school applications and the level of provision in the area.

The CfC states that much of the local provision in settings “is either predominantly Protestant or predominantly Catholic according to designation” (CfC page 24), and suggests that “this is indicative of a lack of pre-school places in settings where children from all faiths and backgrounds can attend comfortably” (CfC page 24). The CfC states that the development of pre-school provision at Bridge IPS would provide the only pre-school education provision of an integrated management type in the area and so would make the Integrated primary school more sustainable into the future (CfC page 25).

### **Relevant Policies, Practices and Duties**

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

The aim of the Pre-school Education Programme is to	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. The EA has advised that sufficient provision exists to meet
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provide a funded pre-school education place for every target age child whose family want it.	current demand for pre-school places in the area. This is considered in more detail below.
Learning to Learn – A Framework for Early Years Education and Learning	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.
Encourage and facilitate the development of integrated education	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 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. 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. This is considered in more detail below.
Reception provision	A key action in the Learning to Learning framework is the removal of reception provision. Bridge IPS does not have reception provision and there is no reception provision within 5 miles.

### 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.92%; 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 2016/17 and 2017/18 academic years using school census data together with provisional 2018/19 data provided by the EA.

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 Bridge IPS

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
2016/17	130	119	0	249	248	100.4%	0
2017/18	130	100	0	230	251	91.6%	1
2018/19	130	97	0	227	222	102.3%	0
Proposed	156	97	-	253	222	113.9%	-

\* Source: EA PEG –

The level of pre-school education provision within a two mile radius is currently above the planning figure of 95%. The EA PEG is managing provision in response to falling levels of demand. If the proposed additional statutory provision was approved, this would result in an increase to almost 114%, approximately 42 places more than the planning figure.

NISRA figures (Annex C) predict an overall decline of 37 births in the area from 2018 to 2020. The reduction in the size of the P1 cohort from 2017/18 to 2018/19 is nearly 12%. This suggests that demand is likely to further decrease over time.

### Level of Provision – five mile radius of Bridge IPS

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
2016/17	208	171	0	379	417	90.9%	0
2017/18	208	140	0	348	420	82.9%	1
2018/19	208	146	0	354	370	95.7%	1
Proposed	234	146	-	380	370	102.7%	-

\* Source: EA PEG –

The level of provision within the five mile radius is currently close to the planning figure, and with the proposed increase in provision the level would increase to 102.7%. Overall, the statistics suggest there are currently sufficient pre-school education places in the wider area.

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

The CfC states that there is a shortfall in pre-school education provision within the area. The table below sets out application and enrolment data for pre-school education settings in the area for the 2017/18 academic year. EYT notes that a similar table appears in the CfC (Table 6), however, it does not contain information on four pre-school providers which collectively provide over 100 pre-school education places.

Although, as set out in the CfC, most statutory pre-school education settings in the area were oversubscribed, this does not take into account all pre-school provision, and there was no overall shortfall in the area. The EA has confirmed that there were sufficient places in the area across all pre-school education settings to provide a funded pre-school education place for every child whose parents wanted it by the end of the pre-school admissions process.

The CfC states that the number of children entering year 1 at Bridge IPS having no recorded pre-school education experience is indicative of under provision in the area (CfC page 26). DE aims to provide a funded pre-school education place for every child in their immediate pre-school year whose parents want it. This has been achieved in the Banbridge area, as all children who remained in the pre-school admissions process to the end had received the offer of a funded pre-school education place. Further to this, the EA reports (based on the previous ward boundaries) that for the 2018/19 academic year, there were 247 applications for 252 pre-school places in the Banbridge Area, suggesting there is adequate provision in the area and no need for additional pre-school education places.

Overall in NI approximately 7%<sup>6</sup> of children have no pre-school education experience or unknown pre-school education experience. The figures reported in the CfC on page 20 are that 3 pupils out of 60 in 2016/17 (5%) and 10 pupils out of 60 in 2017/18 (16.6%) had no pre-school experience. However, the EA PEG has advised that in both years, all children whose parents stayed with the admissions process to the end were placed. Existing providers had capacity to increase provision if additional places had been required, indicating that, if children did not attend pre-school

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<sup>6</sup> DE census figures

education provision in that year, or did not remain with the admissions process, this may have been due to a choice made by their parents, rather than a lack of pre-school provision.

**Application and enrolment data: 2017/18 academic year**

Setting	First Preference Applications	Total Number Admitted
Downshire NS	52	52
Ballydown PS NU	37	26
Banbridge NS	56	52
St Mary's PS NU	40	26
Child's Play Day Nursery	18	16
Humpty Dumpty PG	7	14
Ladybird Lane PG	9	14
Little Friends PG	34	34
Loughbrickland PG	22	25
St Mary's PG	9	18
Laurencetown	17	21
Gilford PS	25	26
St Colman's PS NU	27	26
<b>TOTAL</b>	<b>353</b>	<b>350</b>

Source: EA

#### **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. 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 10 mile radius of Bridge IPS. The closest school of an integrated management type with a statutory nursery unit is Portadown IPS, which is 11 miles away. If this proposal were approved, it is not expected that it would have any impact on provision at Portadown IPS.

The CfC states there has been a noticeable increase in enquiries to the school about future enrolments as well as pre-school provision. The Admissions Number for Bridge Integrated Primary School is 58 and the school's approved enrolment number is 406. The current enrolment of the school is 417.

The CfC states the proposed provision will meet parental preference for nursery provision in a school with an integrated management type and address demand which is unknown to the PEG system.

The CfC contains reference to the following admissions and enrolments to year 1 at the school:

Year	Year 1 admissions	Total enrolment
2016/17	60	413
2017/18	60	417
2018/19*	54	417

\*Source: DE Census

The enrolment and admissions numbers have been consistent for a number of years, with the school undersubscribed with first preference applications for the first time in the 2018/19 year. This suggests that parents in the area may have a preference for education provision with an integrated management type, and that pre-school education provision at the school could be sustainable, as the year 1 intake is considerably larger than the proposed nursery unit size of 26 part time places.

## **5. RECENT CHANGES IN PROVISION**

The CfC states that two pre-school education providers which acted as feeder settings for Bridge IPS have recently withdrawn from the pre-school education programme (CfC page 21). The EA has confirmed that one pre-school education provider, which provided 26 pre-school education places within the two mile radius of Bridge IPS in 2016/17 and 18 places in 2017/18, withdrew from the PSEP for 2018/19 as it did not receive any allocation of pre-school places this year due to the level of over-provision in the area.

If the proposal were approved, it is likely to have an impact on other existing provision by increasing over provision in the area.

## **6. TEMPORARY FLEXIBILITY**

In the 2016/17 academic year there were 4 additional pre-school places approved in statutory settings within a two mile radius of Bridge IPS through Temporary Flexibility. The same setting applied again for 4 places in 2018/19 but this was not supported by the PEG on the grounds that sufficient provision exists within the area to meet demand and the request was not approved.

In the 2017/18 academic year, no requests were made for Temporary Flexibility.

For the 2018/19 academic year, 4 Temporary Flexibility places have been approved at a statutory setting within the five mile radius.

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

## **7. RECEPTION PROVISION**

None of the primary schools within a five mile radius provide reception places.

## **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 states that Bridge IPS has been consistently oversubscribed with year one applications. For the last decade the school has experienced oversubscription (up to 19 places) in first preference applications for P1 enrolments, being undersubscribed for the first time in 2018/19 (by four places).

This suggests that the proposed pre-school provision at Bridge IPS could be sustainable, as the admissions to Year One are significantly higher than the proposed nursery unit size of 26 part time places.

The CfC states that part of the potential impact of the establishment of a pre-school unit at the school could be mitigated, with some of the 26 additional places potentially being filled by children who may otherwise not avail of PSEP provision, such as the 10 P1 children mentioned in the CfC entering Bridge IPS in 2017/18 with no pre-school experience. As the EA has advised that all children whose parents stayed with the pre-school admissions process to the end received the offer of a funded place in 2017/18, there is no evidence to suggest that these children would have attended pre-school education provision at Bridge IPS had it been available.

The EA has indicated that spare capacity is available within non-statutory settings to increase the level of provision if needed, and the proposed change, if implemented, could impact on other provision. A non-statutory pre-school education provider, which provided 26 pre-school education places within the two mile radius of Bridge IPS in 2016/17 and 18 places in 2017/18, withdrew from the PSEP for 2018/19 as it did not receive any allocation of pre-school places this year due to the level of over-provision in the area.

The approval of this proposal could therefore have an impact on other current good quality pre-school education provision in the area, and/or lead to an increase in underage children accessing statutory pre-school education places in the area.

## **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. 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 two underage children who enrolled in a statutory pre-school setting within the five mile radius in the last three years.



The level of pre-school provision in the area has decreased in the last few years as the EA PEG has managed provision in line with decreasing demand. The EA has confirmed that there is capacity within existing providers to increase provision should it be needed. Any increase in provision at this time would be in excess of assessed overall demand and could lead to underage children accessing statutory pre-school provision in the area.

## **10. CONSULTATION RESPONSES**

The CfC states that NICIE Development Officers have had on-going consultation and discussion with the Board of Governors over a number of years. In February 2018 officers met with school personnel including the Principal with regard to developing pre-school provision at Bridge IPS. NICIE has fully supported the school in developing this proposal.

On 23 March 2018, the school consulted with 359 families of children attending and staff working in Bridge IPS. Of that number, the CFC states that 319 represented families with children attending the school, 242 replies were received of which 237 ie 98% of respondents were in support of establishing a Nursery Unit at Bridge IPS (CfC, page 28).

A pre-publication statutory consultation was also carried out between 11 June 2018 and 9 July 2018. Five responses were received, all reported by the EA as objecting to the proposal. The main themes of the objections are reported to include overprovision, the efficient use of public funds and the detrimental impact on existing cross community provision.

EYT notes that comments received during the objection period include concerns from providers regarding the potential for 'unreasonable public expenditure', the displacement of existing provision, doubt expressed over the need for additional provision on the basis of demonstrated parental demand and making optimum use of existing provision to minimise enrolment of underage children.

## **11. EA COMMENTS**

The EA has advised that it supports the DP on the basis of demonstrated parental demand as evidenced by overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that the proposed nursery unit size of 26 part-time places could be sustainable. However, it also raised concerns about the implementation of this proposal, which it

states could result in increased costs for the existing provision which is in excess of overall demand.

The EA PEG registered strong concerns in regard to the potential impact of the proposed additional provision, including potential displacement of existing funded pre-school provision in the area, potential for increased uptake of younger children into statutory nursery settings, the consequent increased cost on public funds; and the impact on existing cross-community provision.

## **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 above the planning figure (102.3% within two miles), and the proposed change would increase it further (to 113.9% within two miles). This is approximately 42 places more than the planning figure.
- There has been a decrease in the year 1 cohort in both the 2 and 5 mile radii, indicating a downward trend in the target age population locally, which aligns with NISRA population projections which suggest a decline in the pre-school cohort over time;
- 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 good quality provision at other pre-school settings;
- Under Article 64 of the Education Reform (NI) Order 1989, 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;
- There is no other pre-school education provision with an integrated management type within 11 miles;
- 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; and,
- The enrolment in year 1 at Bridge IPS has been higher than the proposed nursery unit size of 26 part-time places, suggesting a pre-school unit could be sustainable.

### **13. CONCLUSION**

Based on the evidence and information available, and taking into account the statutory duties placed on the Department, there appears to be a level of demand for pre-school education provision in a setting with an integrated management type in the area. However there is insufficient evidence of the need for additional pre-school provision in the area at this time.

The level of pre-school provision is already high and the proposal would result in 42 more places than the planning figure for the area, at a time when the number of pre-school children is decreasing. The creation of additional provision in the area is likely to further increase the level of over provision and could result in the displacement of existing pre-school education provision and/or lead to additional underage children attending statutory pre-school education provision.

On the basis of the information presented and currently available, and taking into consideration the relevant statutory duties, EYT is unable to conclude that the proposed additional provision is reasonable at this time.

The team notes that, at the time of writing, the admissions process for the academic year 2019/20 has begun.

**List of the providers in the two and five mile radii of Bridge IPS****Two mile radius****Nursery School**

5116238 Banbridge NS  
 5116256 Downshire NS

**Nursery Units**

5036043 St Mary's PS, Banbridge

**Vol/Priv**

5AB0466 Humpty Dumpty Pre-school PG  
 2BB0589 St Mary's PG, Banbridge  
 5CA0558 Ladybird Lane Day Care  
 5CA0559 Little Friends Private Day Care  
 5CA0596 Child's Play Day Nursery

**PS no NU**

5011594 Abercorn PS  
 5013019 Edenderry PS, Banbridge  
 5066540 Bridge Integrated PS

**Five mile radius****Nursery Units**

5011596 Gilford PS  
 5011617 Ballydown PS  
 5036061 St Colman's PS, Annaclone

**Vol/Priv**

5AA0421 Loughbrickland Pre-school  
 5AB0234 Laurencetown Pre-school PG

**PS no NU**

5011651 Milltown PS  
 5011664 Scarva PS  
 5031669 St John's PS, Gilford  
 5036400 St Colman's PS, Bann  
 5036457 St Francis' PS, Aghaderg

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

Banbridge East

Banbridge North

Banbridge South

Banbridge West

Bleary

Donaghcloney

Gilford

Gransha

Loughbrickland

Mahon

Markethill

Quilly

Tandragee

### **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 Bridge IPS indicate a decrease of 37 in the pre-school cohort between September 2018 admissions and September 2020 admissions (838 to 801). However, statistics show an increase in births in the pre-school cohort for September 2019 admissions with 853 live births in 2015.

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

- Population projections for three year olds for Armagh, Banbridge and Craigavon council areas predict a decrease of 106 (3.5%) from 3,034 to 2,928 between 2018 and 2031, and an increase of 201 (6.4%) from 2,932 to 3,133 between 2032 and 2041.

These figures suggest that demand is likely to slightly decrease in the medium 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**

There were Temporary Flexibility requests approved in the area:

**2016/17**

St Mary's PS, Banbridge	4
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**2018/19**

St Colman's PS, Annaclone	4
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There were also a number of Temporary Flexibility requests not approved:

**2018/19**

St Mary's PS, Banbridge	4
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**H Shared Education and Community Relations Team**

The proposer, the Board of Governors of Bridge IPS, in the Case for Change, notes the school's Shared Education partnership with St Ronan's PS Newry, and states that "*Approval for the establishment of a nursery unit at Bridge IPS will also increase the potential for shared education links in the area as Bridge IPS already enjoys good working relationships with ...*" other local schools.

Of local pre-school providers, only Ballydown NU is engaged in Shared Education (through the Peace IV *Sharing from the Start* project). There were two responses to the consultation, from NICIE and CSSC, and both made reference to Shared Education. However, neither provided evidence to indicate that the proposal would be either beneficial or detrimental to progressing Shared Education.

EA conducted the pre-publication consultation and a summary (provided by the EA) of the comments received is included in the Case for Change. This includes one comment on Shared Education, that the proposal "*Would not enhance shared education in the area due to displacing cross-community provision already in place*".

EA did not comment directly on implications for Shared Education.