

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	542
School(s)	Mill Strand Integrated Primary School – 306-6544
Proposal	<i>To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September 2018, or as soon as possible thereafter.</i>
Permanent Secretary's Decision	Approve <u>with modification</u>
Date of Decision	28/05/2019
Permanent Secretary's Comments	<p><i>The school is clearly popular, viable in all respects and providing good quality education. Its nursery unit has consistently been oversubscribed in recent years. As regards the statutory duty on the Department to encourage and facilitate Integrated education, it is also clear that there is strong evidence of parental demand for pre-school provision of this management type.</i></p> <p><i>Against that, the proposal carries a risk of existing good quality provision being displaced. Such considerations weigh heavily on me in my capacity as Accounting Officer in light of the severe pressures facing the education budget, and I have given them considerable prominence in three recent Development Proposal decisions, notwithstanding the statutory duty placed on the Department.</i></p> <p><i>This issue does, however, appear somewhat more finely balanced than in the three which have come before me recently, primarily because the proposal involves creating 26 part-time nursery places which effectively would replace a playgroup associated with school that has accommodated 23 children in recent years. I have noted, in particular, the level of existing provision at the 2 and 5 mile radius levels as outlined at paragraphs 117 to 124 of the submission, with provision at the 2 mile radius significantly below the 95% planning figure, rising to just above it should the proposal be approved. Provision of just over 70% at the 2 mile radius would suggest that pre-school education in the area may be insufficient to meet demand, which seems to me to distinguish this proposal from the recent proposals which I have considered. An approval decision would also align with the decision taken relatively recently in respect of an earlier Development Proposal for the school which established double entry to the host primary school.</i></p>

	<i>On balance, having reflected carefully on all the relevant issues, I have decided to accept the recommendation set out at paragraph 169 of the submission to approve the Development Proposal with the suggestion for a modification to the implementation date.</i>	
Additional notes	The implementation date of the proposal has been modified, as follows: <i>To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September <u>2019</u>.</i>	
Information redacted	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.	
	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

FROM: Eamonn Broderick
 Area Planning Policy & Shared Education Campuses Team
 (cleared by Janis Scallon 17 May 2019)

DATE: 17 May 2019

TO: Derek Baker
 Permanent Secretary

see copy distribution list below

DEVELOPMENT PROPOSAL (DP) 542 - MILL STRAND INTEGRATED PRIMARY SCHOOL AND NURSERY UNIT

<p>Issue:</p>	<p>To decide on the following proposal:</p> <p><i>DP 542 – To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September 2018, or as soon as possible thereafter.</i></p>
<p>Timescale:</p>	<p>The pre-school admissions process is in progress with Stage 1 placement letters having issued on 9 May 2019. As Stage 2 is due to complete on 11 June, an early decision would help facilitate an orderly admissions process.</p>
<p>Financial Implications:</p>	<p><u>Capital</u> No initial capital funding required. Should DP 542 be approved, the additional nursery unit could be incorporated into the new-build Fresh Start funded project on a new site planned for Mill Strand Integrated Primary School and Nursery Unit and, subject to the availability of budget cover and the necessary approvals, the Department will consider meeting the additional cost from within its Capital Budget. Additional costs to upgrade the scheme to a double nursery unit are expected to be in the region of £200k.</p> <p><u>Resource</u> This DP, if approved, would be an additional pressure on the Aggregated Schools Budget (ASB), in terms of the overall education budget.</p> <p>In-year cost: estimated at £32k, charged against the Department’s ‘New Schools and Units’ fund.</p> <p>Full Year Cost: estimated at £55k, charged against the ASB.</p>

	<p>Additional unquantified funding will be required for salaries and overhead costs, charged against the school's delegated budget.</p>
FOI Implications:	<p>The content of this submission is likely to be fully disclosable.</p>
Statutory Duties Implications:	<p>Article 64 of the Education Reform (NI) Order 1989, <i>to encourage and facilitate the development of integrated education.</i></p> <p>Article 44 of the Education and Libraries (NI) 1986 Order.</p> <p>The Shared Education Act (Northern Ireland) 2016</p> <p>The Rural Needs Act (NI) 2016</p>
Presentational Issues:	<p>It is likely that there will be local media interest in your decision. If approached the Press Office can draw from this submission. <i>(Cleared with Press Office)</i></p>
Recommendation:	<p>It is recommended that you:</p> <p>(i) Approve DP 542 <u>with a modification</u> to the implementation date (as the proposed date has now lapsed):</p> <p><i>To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September <u>2019</u>.</i></p> <p>(ii) Agree that this submission (with appropriate redactions) can be made available on the Department's website once the school and the Education Authority have been notified.</p>

CONTENTS

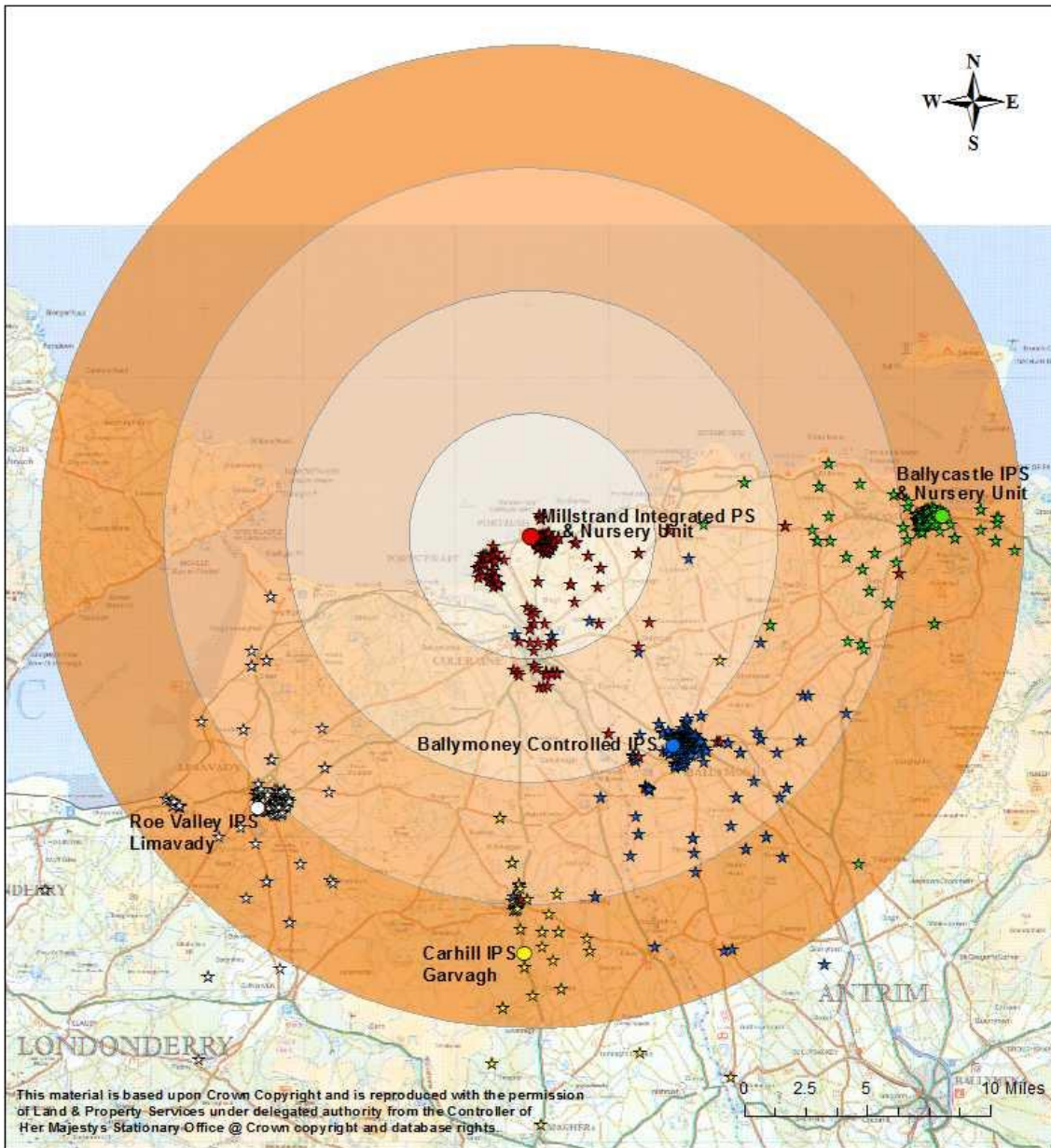
Maps

	Paragraph number
Introduction	1
Background	3
Area Context	9
Special Considerations	21
Case for Change	33
Statutory DP Processes	34
Sustainability Assessment	50
Analysis of Special Considerations	79
Other Considerations	105
Summary	149
Conclusion	162
Recommendation	169

Appendices

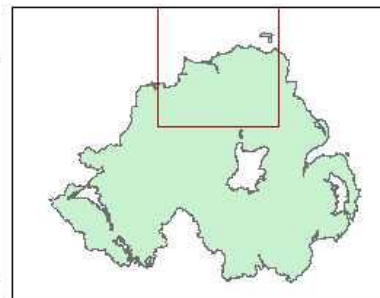
Appendix A:	Copy of DP 542
Appendix B:	Case for Change
Appendix C:	Education and Training Inspectorate (ETI) Comments
Appendix D:	Responses received during the statutory two month objection period
Appendix E:	Department of Education (Policy Team) Comments

Mill Strand IPS & NU - Alternative Integrated Provision / Pupil Locations (20 mile radius)



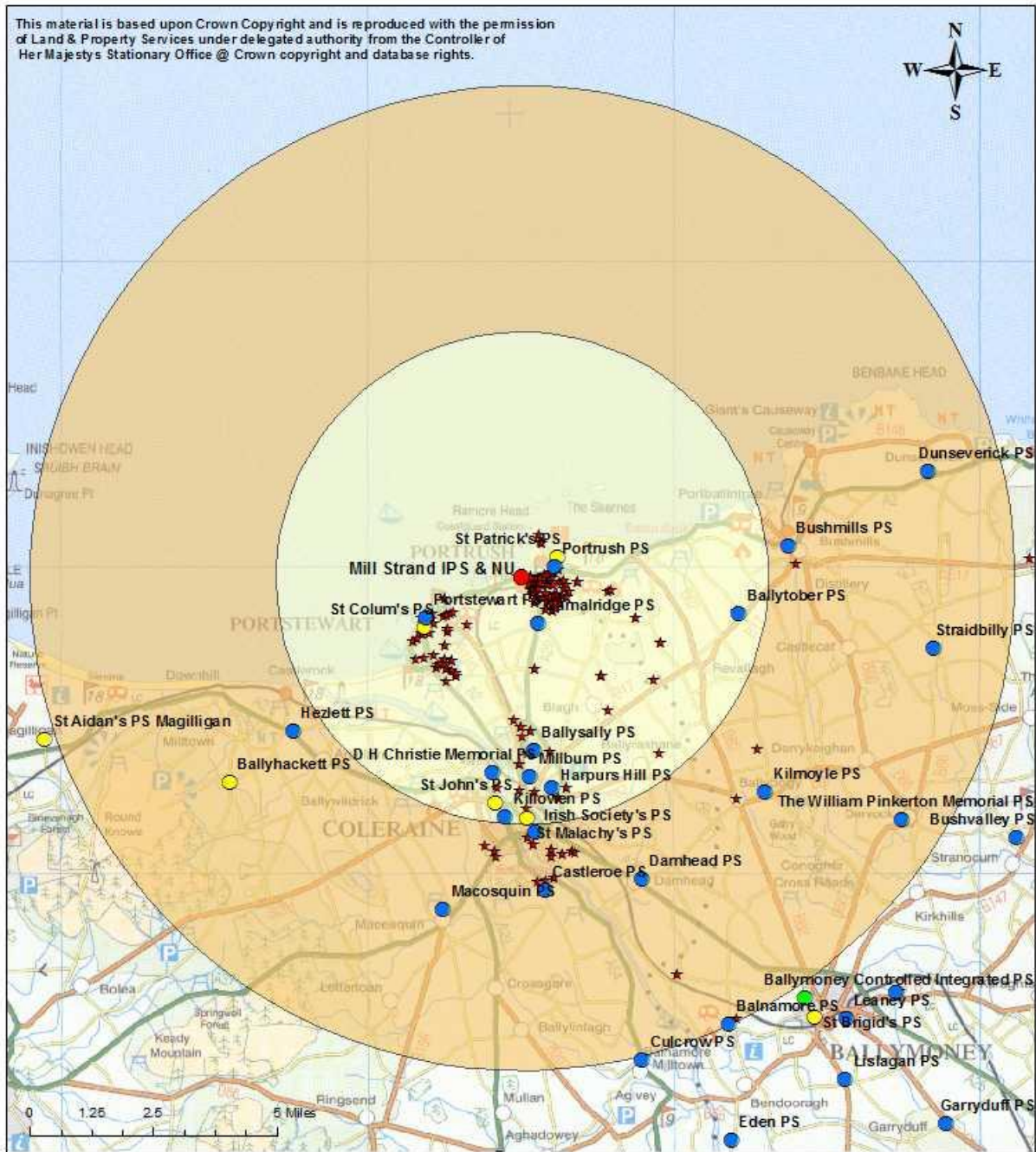
This material is based upon Crown Copyright and is reproduced with the permission of Land & Property Services under delegated authority from the Controller of Her Majesty's Stationary Office @ Crown copyright and database rights.

● Mill Strand IPS & NU	☆ Roe Valley IPS - Pupil locations
● Ballycastle IPS	☆ Carhill IPS - Pupil locations
● Ballymoney Controlled IPS	
● Carhill IPS	Buffer Distance in miles
○ Roe Valley IPS	0.00 - 5.00
★ Mill Strand IPS & NU - Pupil locations	5.00 - 10.00
★ Ballycastle IPS & NU - Pupil locations	10.00 - 15.00
★ Ballymoney Controlled IPS - Pupil Locations	15.00 - 20.00

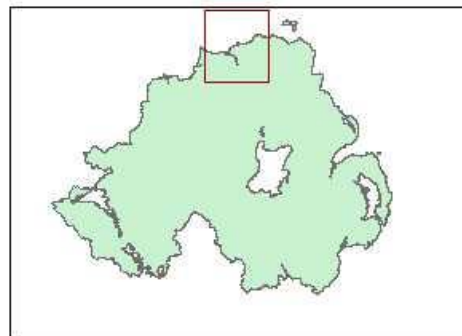


Mill Strand Integrated PS & NU - Pupil Locations (10 Mile Radius)

This material is based upon Crown Copyright and is reproduced with the permission of Land & Property Services under delegated authority from the Controller of Her Majesty's Stationary Office @ Crown copyright and database rights.

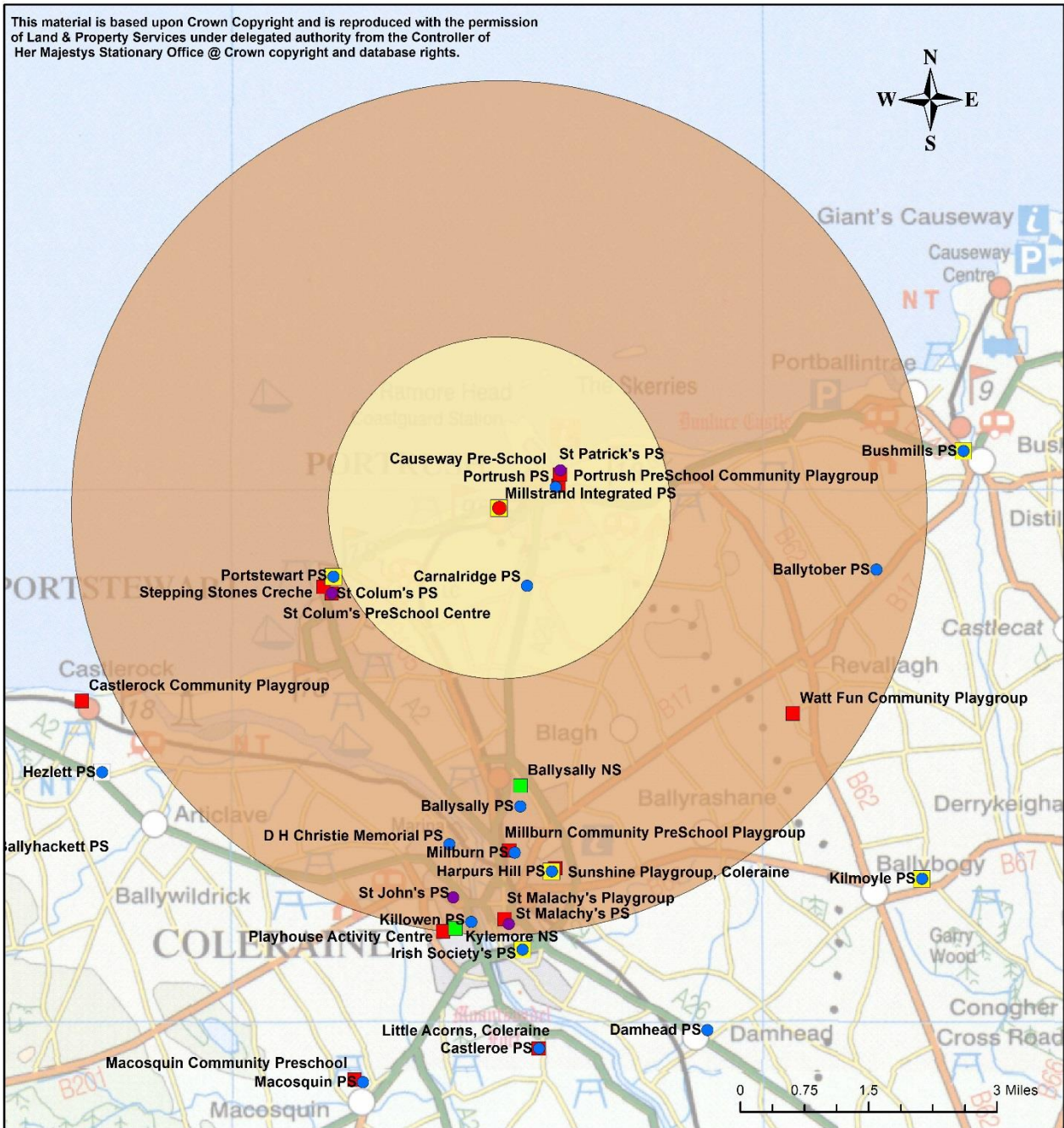


- Mill Strand IPS & NU
 - GMI
 - Controlled Integrated
 - Controlled
 - Catholic Maintained
 - Voluntary
 - Other maintained
 - ★ Mill Strand IPS & NU - Pupil locations
- Buffer distance - 10 mile radius**
- 0.00 - 5.00
 - 5.00 - 10.00

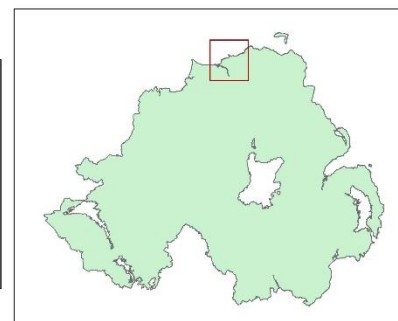


Mill Strand IPS & NU - Alternative Primary/Pre School Provision (5 Mile Radius)

This material is based upon Crown Copyright and is reproduced with the permission of Land & Property Services under delegated authority from the Controller of Her Majesty's Stationary Office @ Crown copyright and database rights.



- | | |
|---------------------------------|--------------------------------------|
| ● Mill Strand IPS & NU | ■ Primary Schools with Nursery Units |
| ● GMI Primary | □ Primary Schools with Rec pupils |
| ● Controlled Integrated Primary | ■ Nursery Schools |
| ● Controlled Primary | ■ Vol/Private Pre-Schools |
| ● Catholic Primary | ■ Buffer Distance 2 miles |
| ● Other Maintained Primary | ■ Buffer Distance 5 miles |
| ○ Voluntary Primary | |



INTRODUCTION

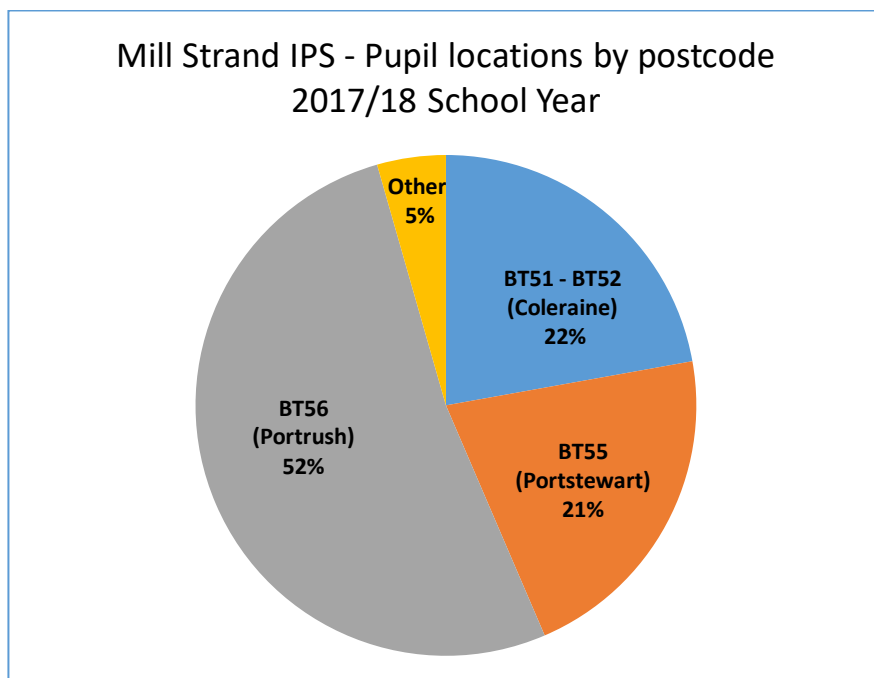
1. On the 16 May 2018, the Education Authority (EA) published DP 542 on behalf of the Board of Governors (BoG) of Mill Strand Integrated Primary School (IPS) proposing to establish an additional 26 part-time nursery places at Mill Strand IPS with effect from 1 September 2018, or as soon as possible thereafter.

2. The statutory two month objection period for this proposal commenced on the date of publication and ended on 16 July 2018. Copies of the published DP and the proposer's supporting Case for Change are attached at Appendices A and B respectively.

BACKGROUND

3. Mill Strand IPS is a co-educational, Grant-Maintained Integrated (GMI) primary school currently located at 33 Dhu Varren, Portrush, on the main road to Portstewart. The school opened in 1987 and, as can be seen from Map 1 above, is the only integrated primary school serving Coleraine, Portrush, Portstewart and the surrounding area - known locally as the 'Triangle' area. Map 2 above shows the wide catchment area of the school, further demonstrated by Chart 1 below which indicates that 48% of pupils come from outside the immediate Portrush area, mainly from the other 'Triangle' area towns.

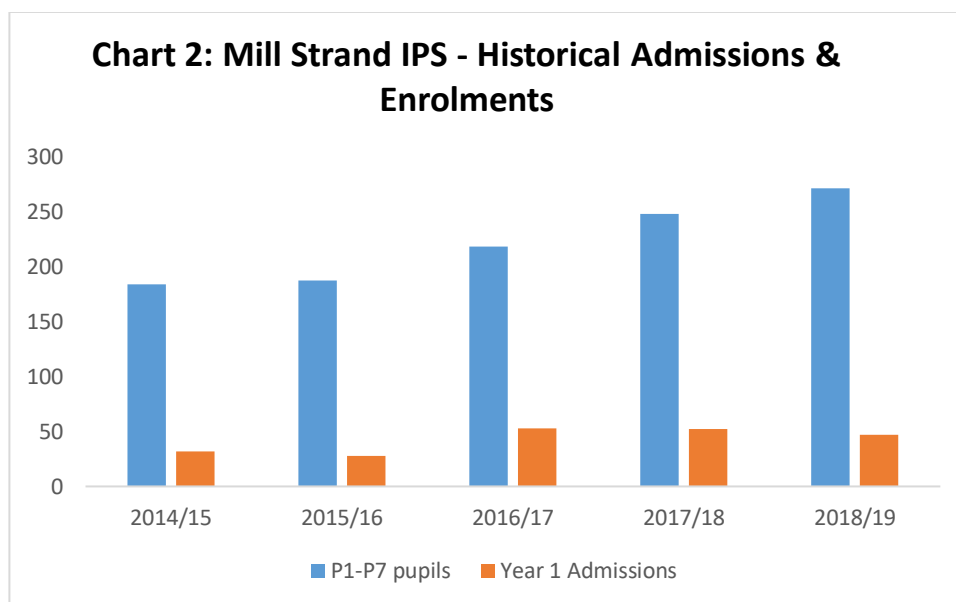
Chart 1: Mill Strand IPS – Pupil Locations by Postcode



4. In 2018/19, the school had an approved enrolment number of 260 and an approved admissions number of 58 and admitted 47 pupils to Year 1 with an overall enrolment of 271 pupils across P1-P7, including 9 pupils with a statement of special educational needs.

5. Enrolment numbers at Mill Strand IPS have been increasing steadily over recent years. This trend is expected to continue following your approval of DP 483 in July 2017, as a result of which the school's admissions number was increased from 30 to 58 and the enrolment number from 232 to 406, to be brought about through an annual phased increase commencing in September 2018. The school's historical admissions and enrolment figures are set out in Chart 2 below.

Chart 2: Mill Strand IPS – Historical Admissions and Enrolments



Mill Strand IPS Pre-School Provision

6. According to the Case for Change, the existing Nursery Unit (NU) at Mill Strand IPS was initially established as a pre-school, becoming a GMI nursery in 2001 offering 26 part-time places. Due to social deprivation, these were increased in November 2009 to the current level of provision i.e. 26 statutory full-time places. According to the school's website, the nursery opens at 8.30am and finishes at 1pm (full-time provision is defined as over 4.5 hours).

7. The Case for Change advises that an independent pre-school playgroup opened at the school in September 2015 funded by the Integrated Education Fund (IEF), in order to meet parental demand for places at an integrated pre-school setting. The school's website states that the Board of Directors of Mill Strand IPS funded this provision for a further two years and the IEF provided funding for a fourth year of pre-school provision. Although it is not clear from the Case for Change when, and for how long the playgroup session runs, the school's website indicates that this is full-time and is run during the same times as the school's existing full-time NU. The playgroup is registered through the Northern Health and Social Care Trust (NHSCT) and the Case for Change states that it is now registered for 23 children which corresponds with the total number of children admitted in both 2017/18 and 2018/19. Table 1 below shows the applications and admissions to the playgroup, as stated in the Case for Change, since it opened in September 2015.

Table 1: Mill Strand IPS Independent Pre-school Playgroup - Applications and Admissions

School Year	Total First preference Applications	Total Applications	Total Number of Admissions
2015/16	17	17	17
2016/17	15	21	20 (inc ■ underage)
2017/18	23	27	23 (all correct age)

8. Information validated by the EA indicates an enrolment of 23 pupils in the pre-school playgroup for 2018/19.

AREA CONTEXT

9. On the Northern Ireland Multiple Deprivation Measure 2017, the Atlantic area (in which Mill Strand IPS and NU is located) is ranked 213 out of 890 (1 being the most deprived and 890 being the least deprived). In 2018/19, 22.9% (62) of the pupils in years 1-7 were entitled to free school meals.

10. The NI Statistics and Research Agency (NISRA) local birth rates and population predictions 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 5 mile radius of Mill Strand IPS are decreasing by some 12% from 396 to 348 children in the pre-school cohort between September 2016 and September 2018 admissions.
- Population projections for 3 year olds for the Causeway Coast and Glens council area predict a significant drop in population in the area, with a fall of 23% between 2018 and 2039 (1,818 to 1,396).

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

EA’s “Providing Pathways” Strategic Area Plan for School Provision 2017-2020

11. The EA’s “Providing Pathways” Strategic Area Plan 2017-2020 (the Area Plan) identifies a number of key emerging issues from analysis of current provision in the Causeway Coast and Glens Local Government District (LGD) area. Issues relevant to Mill Strand IPS are as follows:

- ensure that school places are located as required; and
- encourage and facilitate the development of sustainable Irish Medium and Integrated schools.

12. The Area Plan states that the population within the age range 0-15 years in the Causeway Coast and Glens LGD is projected to decrease by 1.4% by 2024.

13. This DP is included in the EA's Action Plan for April 2018 to March 2019 which states "*Board of Governors to consult on options for the future pre-school provision at Mill Strand IPS by March 2019*".

14. A DP to establish an additional 26 part-time nursery places at Mill Strand IPS with effect from 1 September 2017 (DP 484) was previously published on 11 January 2017 but was not approved on 10 July 2017. The current proposal has been considered against the current context, and so reflects changes and updated information since the previous DP, including changes to the pattern of pre-school applications and the level of provision in the area.

Alternative Integrated Education Provision

15. Map 1 plots the location of Mill Strand IPS together with the nearest alternative integrated pre-school/primary provision within a 20 mile radius.

16. The closest alternative integrated primary school (Ballymoney Controlled IPS) is almost 13 miles away by road and the other three schools are 19/20 miles away. Tables 2 and 3 below provide distances from Mill Strand IPS and historical enrolments and admissions at the schools.

Table 2: Alternative Integrated Education Provision – Historical Enrolments

School	Distance from Mill Strand IPS	Approved Enrol Number 2017/18	2014/15 Actual Enrol	2015/16 Actual Enrol	2016/17 Actual Enrol	2017/18 Actual Enrol	2018/19 Actual Enrol
Ballymoney CIPS	12.8	414	328	354	355	389	398
Ballycastle CIPS	18.6	158	160	176	176	171	169
Carhill CIPS, Garvagh	19.3	94	66	67	71	67	66
Roe Valley IPS, Limavady	20.2	174	162	170	188	187	198
Totals		840	716	767	790	814	831

Table 3: Alternative Integrated Education Provision – Admissions

School	Approved Admissions Numbers	2015/16 Actual Y1 Admissions	2016/17 Actual Y1 Admissions	2017/18 Actual Y1 Admissions	2018/19 Actual Y1 Admissions
Ballymoney CIPS	59	66	57	59	60
Ballycastle CIPS	23	29	27	28	17
Carhill CIPS, Garvagh	13	5	12	9	*
Roe Valley IPS, Limavady	25	26	30	31	30
Totals	120	126	126	127	#

17. Ballycastle CIPS is the only one of the four schools with a NU. It routinely provides 26 full-time places - in 2018/19 there were 25 pupils enrolled in the NU. The EA's Area Plan for 2018/19 includes an action (carried forward from the 2017/18 Area Plan) "Board of Governors to consult on options for the future pre-school provision at Roe Valley IPS by March 2019".

Alternative Pre-school Provision

18. Mill Strand IPS and the alternative statutory and non-statutory pre-school provision within a five mile radius, illustrated by Map 3, is detailed below. While Irish Society PS & NU is outside the five mile radius, it is included in our consideration for completeness, as it is within the town of Coleraine.

Table 4: Alternative Statutory Pre-school Provision

DE Ref No	School Name	Postcode	Distance in miles by Road	2014/15		2015/16		2016/17		2017/18		2018/19	
				FT	PT	FT	PT	FT	PT	FT	PT	FT	PT
	Nursery Schools			FT	PT	FT	PT	FT	PT	FT	PT	FT	PT
311-6263	Ballysally NS, Coleraine	BT52 2QP	4.1	52	0	52	0	52	0	52	0	52	0
311-6215	Kylemore NS, Coleraine	BT51 3HG	6.6	0	105	0	105	0	104	0	105	0	106
Sub-total				52	105	52	105	52	104	52	105	52	106
	Primary with NU			FT	PT	FT	PT	FT	PT	FT	PT	FT	PT
306-6544	Mill Strand IPS & NU		/	26	0	29	0	27	0	26	0	28	0
301-2250	Portstewart PS & NU	BT55 7BT	2.3	26	0	26	0	26	0	26	0	26	0
301-6052	Harpur's Hill PS & NU, Coleraine	BT52 2ER	5.7	26	0	27	0	26	0	26	0	30	0
301-6264	Irish Society PS & NU, Coleraine	BT52 1JL	6.3	0	52	0	52	0	52	0	52	0	51
Sub-total				78	52	82	52	79	52	78	52	84	51
Totals				130	157	134	157	131	156	130	157	136	157

Distances as per Google maps

FT = Full-time PT = Part-time

It should be noted that in 2018/19 Kylemore NS has 26 underage pupils (it has a history of accepting underage pupils), Portstewart PS NU has ■ underage pupils and Irish Society PS has 15 underage pupils (it also has a history of accepting underage pupils).

Table 5: Alternative Non-Statutory Pre-school Provision

DE Ref No	School Name	Postcode	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
	Pre-school												
3BB-0367	Portrush Pre-School Community PG	BT56 8JW	0.9	32	32	27	27	33	29	30	21	26	26
3CA-0631	Causeway Pre-School, Portrush	BT56 8JE	1.2	19	15	16	11	15	15	16	11	21	21
3BB-0369	St Colum's Pre-School Centre, Portstewart	BT55 7EF	2.5	23	20	31	31	23	20	20	12	24	24
3CB-0486	Stepping Stones Creche, Portstewart	BT55 7AH	2.7	21	11	18	9	12	10	28	10	19	9
3AB-0130	Watt Fun Community PG, Coleraine	BT52 2LT	5	26	26	25	16	30	16	35	24	24	24
3AB-0248	Millburn Community Pre-School PG, Coleraine	BT52 2AN	5.1	23	23	24	24	26	25	24	23	24	24
3AB-0585	Sunshine PG, Coleraine	BT52 2ER	5.7	24	15	24	19	24	12	24	12	24	24
3AB-0096	St Malachy's PG, Coleraine	BT52 1LR	6.4	23	18	24	24	25	19	21	19	26	20
3AB-0260	Playhouse Activity Centre, Coleraine	BT51 3EZ	7.1	24	24	24	24	32	24	24	24	24	24
Totals				215	184	213	185	220	170	222	156	212	196

Distances as per Google Maps T = Total F = funded

19. The alternative pre-school provision is perhaps more clearly demonstrated by its location in the three 'Triangle' towns, as shown in Table 6 below:-

Table 6: All Pre-school Provision by Town

DE Ref No.	Pre-School	Postcode	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
	Portrush												
306-6544	Mill Strand IPS & NU	BT56 8EW	-	26	26	29	29	27	27	26	26	28	28
3BB-0367	Portrush Pre-School Community PG	BT56 8JW	0.9	32	32	27	27	33	29	30	21	26	26
3CA-0631	Causeway Pre-School	BT56 8JE	1.2	19	15	16	11	15	15	16	11	21	21
Sub-total				77	73	72	67	75	71	72	58	75	75

Portstewart													
301-2250	Portstewart PS & NU	BT55 7BT	2.3	26	26	26	26	26	26	26	26	26	26
3BB-0369	St Colum's Pre-School Centre	BT55 7EF	2.5	23	20	31	31	23	20	20	12	24	24
3CB-0486	Stepping Stones Creche	BT55 7AH	2.7	21	11	18	9	12	10	28	10	19	9
Sub-total				70	57	75	66	61	56	74	48	69	59
Coleraine													
311-6263	Ballysally NS	BT52 2QA	4.1	52	52	52	52	52	52	52	52	52	52
3AB-0130	Watt Fun Community PG	BT52 2LT	5.0	26	26	25	16	30	16	35	24	24	24
3AB-0248	Millburn Community Pre-School PG	BT52 2AN	5.1	23	23	24	24	26	25	24	23	24	24
301-6052	Harpur's Hill PS & NU	BT52 2ER	5.7	26	26	27	27	26	26	26	26	30	30
3AB-0585	Sunshine PG	BT52 2ER	5.7	24	15	24	19	24	12	24	12	24	24
301-6264	Irish Society PS & NU	BT52 1JL	6.3	52	52	52	52	52	52	52	52	51	51
3AB-0096	St Malachy's PG	BT52 1LR	6.4	23	18	24	24	25	19	21	19	26	20
311-6215	Kylemore NS	BT51 3HG	6.6	105	105	105	105	104	104	105	105	106	106
3AB-0260	Playhouse Activity Centre	BT51 3EZ	7.1	24	24	24	24	32	24	24	24	24	24
Sub-total				355	341	357	343	371	330	363	337	361	355
Totals				502	471	504	476	507	457	509	443	505	489

Distance as per Google Maps T = Total F = funded

20. The tables above show that there are five alternative statutory providers and nine non-statutory providers in the area.

SPECIAL CONSIDERATIONS

Statutory Duties

Integrated Education

21. There is a statutory duty on the Department (DE) under Article 64 of the Education Reform (Northern Ireland) Order 1989, '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

22. DE must also be mindful of 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.

Shared Education

23. The Shared Education Act (Northern Ireland) 2016 makes legislative provision in relation to shared education. It provides a definition of Shared Education and confers a duty

on DE to encourage, facilitate and promote Shared Education and a power on relevant arm's-length bodies of the department to encourage and facilitate shared education.

24. Shared Education is not a type of school; rather it encourages all types of schools to collaborate with other schools to provide opportunities for pupils from different religious and socio-economic backgrounds to be educated together. Schools retain their individual ethos collaborating together in partnership for the benefit of their pupils.

25. While any Shared Education programme must initially meet the Shared Education definition¹ set out in the Shared Education Act (Northern Ireland) 2016, each programme is unique to the needs of the partner schools. Hence Shared Education provision in partnerships within a local geographical area can differ across partnerships.

26. Most of the letters of objection make reference to the Department's statutory duty in relation to shared education. None of the schools in Portrush are involved in the Delivering Social Change (DSC) Shared Education Signature Project (SESP). There are three projects currently involved in the SESP in Coleraine: Killowen PS and St John's PS; Millburn PS and St Malachy's PS; and Harpur's Hill PS and St Malachy's PS. The two primary schools in Portstewart – St Colum's PS and Portstewart PS – are currently involved in the Peace IV Shared Education Programme which encourages the development and delivery of Shared Education within education settings that have limited or no prior experience.

Policy Context - Early Years

27. The aim of the Pre-school School Education Programme (PSEP) is to provide a funded place for every target age child whose family want it. It is also the Department's practice, where possible, not to displace good quality pre-school education provision already in existence with pre-school education provision in an alternative setting.

28. The Department's Learning to Learn Policy (A Framework for Early Years Education and Learning, published on 7 October 2013), among its key actions, placed a moratorium on any new or additional full-time provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it.

Rural Considerations

29. 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

¹ The education together of (a) those of different religious belief, including reasonable numbers of both Protestant and Roman Catholic children or young persons; and (b) those who are experiencing socio-economic deprivation and those who are not.

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. Mill Strand IPS is defined as rural under the Sustainable Schools Policy (SSP).

Future Location of Mill Strand IPS

30. Some of the letters of objection to this DP refer to the current uncertainty surrounding the future location of Mill Strand IPS which they state affects adequate consideration of the area planning impact of this proposal.

31. The final “A Fresh Start – Stormont Agreement and Implementation Plan” which was published in November 2015, included provision of a contribution of up to £500 million over a ten year period of new capital funding to support shared and integrated education, subject to individual projects being agreed between the NI Executive and the UK Government. A major capital investment project to improve/replace the accommodation at Mill Strand IPS was one of the projects included to be taken forward in planning in March 2016. The current estimated construction costs are £4.25M with an estimated 15 month construction period once the business case and the statutory approvals are received.

32. The Department proposes to build a 14 class base school and single NU. The new-build school is currently being designed for Mill Strand IPS under the Fresh Start programme. The project currently allows for a single NU but can be designed in such a way to ensure a double NU can be included if the DP is approved. In the event the DP is approved, the additional NU could be incorporated into the new-build school project and, subject to the availability of budget cover and the necessary approvals, the Department will consider meeting the additional cost from within DE’s Capital Budget. It is anticipated the additional costs to upgrade the scheme to a double nursery are in the region of £200k. Timing can be reviewed should the DP be approved.

CASE FOR CHANGE

33. The Case for Change in support of this proposal is reproduced in full at Appendix B. It sets out the rationale for the proposal as follows:

- The desire for this proposal is led in part by the parents of children attending Mill Strand IPS as they want local, accessible integrated pre-school education for their children;
- The level of over-subscription in the NU demonstrates parental demand that the BoG believes must be addressed;
- The proposal would support the realisation of the objectives of Area Based Planning... *‘to facilitate the development of a network of viable and sustainable primary schools which can effectively deliver the NI Curriculum’;*

- Would address the mismatch in admissions between the two-form entry in the primary and the single unit entry in the NU thereby supporting the school to deliver improved outcomes for children, a smoother transition and to become a more sustainable school;
- Would support DE by assisting in its statutory duty 'to encourage and facilitate the growth of integrated education';
- Would be a more efficient and effective way of funding early years provision by rationalising governance and inspections under a single model, i.e. the LMS management system;
- The registering authority (NH&SCT) require the school to adhere to procedures that prevent the children in the playgroup mixing with the children in the statutory NU. Approval of the proposal would permit this as the school would be operating under one management system;
- Social Services' Early Years regulations for Playgroups prevents the playgroup children from having any engagement with other pupils and staff in the school. The provision of 26 additional part-time nursery places would ensure that all pupils enrolling in Year 1 have access to the same developmental opportunities in their pre-school year and also equality of early identification of needs and intervention;
- 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;
- Would support parents in being able to access the highly sought pre-school provision in this integrated school environment from the age of 3 to 11 years in the 'Triangle' area;
- Those involved in Mill Strand IPS would like to play a role in moving towards a shared future for all. The school has been at the forefront of building a shared future for all and continues to strive to break down barriers in a community still divided on grounds of religious difference;
- Mill Strand IPS is the only integrated pre-school and primary school provision in the 'Triangle' area. Other integrated settings serve catchment areas that are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, are realistic options for parents seeking integrated provision;
- The school has a waiting list of pupils that it cannot accommodate in its pre-school settings having had a request for temporary flexibility, for children with siblings at the school, turned down;

- The plans for the new 14 class base Fresh Start funded school for Mill Strand IPS allow for the potential of a double NU. This would be the best possible opportunity to address the documented ‘under provision’ of pre-school places in the Portrush area;
- Whilst the 1989 Education Reform Order enabled the grant aiding of integrated schools, integrated nurseries were excluded from this until 1998, thus many integrated schools were established in those early years and were not permitted to have funded NUs;
- The Department’s letter of 31 October 2017 states that “it is important the EA and the Pre-School Education Group (PEG) support the Department by striving to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools...”;
- It is difficult to state that pre-school is in reality non-sectoral – the school states that whilst there is definite mixing in Mill Strand IPS NU, only one other pre-school setting in Portrush/Portstewart has Roman Catholic and Protestant children in the same classroom; and
- The continuity and progression of educational provision that can only be facilitated through a Foundation Stage education on a single site, enabling a coherent, collaborative approach, a very high quality of transition to Year 1 in the primary school for all the pre-school pupils and allowing the school to create two equal classes that will help maximise educational outcomes for the whole year group throughout its seven years of primary education.

STATUTORY DP PROCESSES

Pre-publication Consultation

34. The Case for Change states that the school carried out a series of consultations which included members of the BoG, staff, parents and pupils between January 2014 and November 2017. The views of all those involved were unanimously in favour of taking forward a DP for an additional 26 part-time nursery places at the school.

35. The EA has confirmed that it carried out its statutory obligations in relation to the proposal. Comments were invited from 77 schools which might be affected by the proposal on 11 January 2018 (all within the Causeway Coast and Glens Council area), to be returned to the EA by 8 February 2018. One of the providers was not included in the initial consultation, therefore their comments on the proposal were invited to be returned by 23 April 2018.

36. During the pre-publication consultation, the EA received 8 responses in total, including one from the Controlled Schools’ Support Council (CSSC), all of which expressed concerns about the proposal, many of which were similar. Objections included the following points:

- Pre-school provision is not defined according to sector;
- Potential impact on the sustainability of other neighbouring schools;
- There is sufficient capacity within the area to cope with any additional demand and this should be filled prior to additional capacity being created;
- The impact of increasing statutory nursery provision would be a further bias and prejudicial to existing voluntary playgroups in the area;
- DE has consistently been unable to provide the necessary resources to establish nursery provision with other primary schools in the area;
- Concerns over safe operation of the site and access issues to the school;
- Long history of cross community pre-school provision in the area, including well established Shared Education links between schools;
- Area planning impact cannot be adequately considered when the new site for Mill Strand IPS is still to be identified;
- Level of pre-school/nursery provision across the 5 mile radius indicates there is over provision in the area and population projections would indicate that fewer pre-school places are likely to be required in the future;
- Parental demand for integrated pre-school provision includes demand from outside the two mile radius, therefore the demand for pre-school provision within a two mile radius does not justify an additional 26 places; and
- Excellent transition programmes exist within all pre-school settings and primary schools in the area to ensure all children experience a smooth transition from pre-school to primary school.

PEG Comments

37. The PEG states that it considered DP 542 in line with guidance² provided by DE regarding pre-school education and the statutory duty to encourage and facilitate integrated and Irish-Medium education. In this context, the PEG supports the DP on the basis of demonstrated parental demand as evidenced by:

- the number of first preference applications (50 for 26 places); and

² The Department wrote to the statutory planning authorities on 31 October 2017 reminding them of the need to support DE in the fulfilment of the statutory duty to encourage and facilitate the development of integrated and Irish-medium education, highlighting the role that the Pre-school Education Group (PEG) should play in striving to meet demonstrated parental demand in an area for pre-school education located at integrated primary schools.

- overall enrolment trends for the school and the P1 intake over a number of years, which would suggest that a 52 place NU would be sustainable.

38. However, the PEG states that it would have 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; and
- impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education.

EA Comments

39. The EA commented in the Case for Change that it 'notes the guidance provided by DE and notes the recommendations of PEG; and 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'.

40. The full EA and PEG commentary is reproduced within the Case for Change attached at Appendix B.

Statutory Two Month Objection Period

41. DP 542 was published on 16 May 2018 on behalf of the BoG of Mill Strand IPS. The statutory objection period, during which expressions of support or objection can be submitted to the Department, ended on 16 July 2018. The Department received seven letters of support (mostly from parents) and five letters of objection (mainly from local primary schools and a local playgroup) in relation to the proposal. The Northern Ireland Council for Integrated Education (NICIE) submitted a letter of support for the proposal and one of the letters of objection was submitted by the CSSC. The main points are summarised below, with responses reproduced in full at Appendix D.

42. The letters of support raised the following views:

- Integrated education is the way forward for people in NI to live in peace with each other;
- The Good Friday Agreement placed a responsibility on our politicians to support the growth of integrated education. The courts have already confirmed that 'Shared Education is not integrated education and that integrated education is a sector in its own right'. Integrated education can only be provided in integrated schools;
- Mill Strand IPS and NU is the only integrated education provider at primary and nursery level in the area (Portrush, Portstewart and Coleraine);

- There is clear evidence of an established demand for the additional provision. The NU is currently oversubscribed each year by nearly double the applicants to places, with over 50 applicants for 26 places this year;
- It is morally wrong to oppose the DP to deny parental choice for integrated education thereby forcing children into non-integrated schools against their wishes where they may be separated on the basis of religion at the age of four;
- You have a moral right to integrated education. There is funding available to allow Mill Strand IPS to provide it through FSA. It is inconceivable that the DP would not be approved;
- The continuity and progression afforded by having a pre-school year within a child's primary setting facilitates a more co-ordinated approach to early years education including early intervention and positive learning outcomes;
- A pre-school year in an integrated setting enables children to foster positive attitudes within that ethos from the earliest possible age;
- The school continues to grow in popularity as more and more parents want an integrated school for their children from the outset of their education;
- The founders of Mill Strand IPS had to re-mortgage their homes to set up the school that pupils benefit from today. This DP will secure the maximum investment and the future of the area's only integrated Primary and Nursery School for generations to come;
- With over half of the 50 applicants applying for a place in September 2018 having a brother or sister already at the school, additional places are necessary to enable new families to avail of an integrated education;
- Younger siblings of children enrolled in the primary school not being secured a place;
- Parental demand for an integrated start to a child's journey where they will not be separated from their peers at the age of 4 on the basis of their perceived religion; and
- Duty and responsibility of politicians and government to support the growth of integrated education.

43. Letters of objection were received from Watt Fun Community Playgroup; St Patrick's PS, Portrush; Portrush PS and Carnalridge PS. The views raised were as follows:

- Little, if any, significant change from previously submitted DP 484;
- Number of flawed and tenuous arguments in the Case for Change, including that the school states it serves the three 'Triangle' towns but the data used ignores all schools in the Coleraine area when examining pre-school provision;
- Situation in the school has been allowed to progress unchecked (by EA or DE) where children have been placed in substandard accommodation with H&S risks to allow the school to force a new build;
- Challenge to the view of pre-school being non-sectoral would set precedent and would have far reaching implications;
- Impact of increasing statutory nursery provision within the only school in Portrush which currently has such provision would be a further bias in a playing field that is already uneven and would be prejudicial to existing voluntary playgroups in the area;

- Subsequent detrimental impact on the sustainability of neighbouring settings and could seriously disadvantage children by leading to the creation of composite classes in other schools;
- Enrolment trends inflated by external funding which has created additional places in teacher-led pre-school settings for extended periods of time;
- Area planning impact cannot be properly assessed until the new site has been identified;
- Pre-school provision is cross community and not defined according to sector;
- Existing site has traffic issues in terms of school drop offs and collections. This will only be further exacerbated by an increase in numbers;
- History of successful cross community pre-school provision in the area and an inclusive ethos within local schools including Shared Education;
- Duplication of provision would represent an unacceptable inefficient use of public funds to the detriment of the education sector;
- In current budgetary climate resources should be directed to existing quality units that are providing for actual demand, rather than creating surplus on modelled figures;
- The additional class operating out of Mill Strand IPS offers four hours of teacher-led provision. This extended time will inevitably create a demand, however there is no evidence to support the assertion that it is a demand for integrated ethos;
- Enrolment trends have been inflated by external funding which has created additional places in teacher-led pre-school settings for extended periods of time outside the statutory planning framework;
- There is sufficient/over provision of pre-school places within the Mill Strand NU catchment area (the 'Triangle' area) to accommodate existing/anticipated future requirements;
- Excellent transition programmes already exist within all statutory and voluntary pre-school providers and primary schools, which ensure that children experience a smooth transition from pre-school to primary school regardless of which pre-school they are transferring from, or primary school they are transferring to.

NICIE Comments

44. NICIE has written to the Department in support of the proposal and its commentary is reproduced in full at Appendix D. Key issues are summarised below:

- In bringing forward this proposal, the Governors are responding to consistent and growing over-subscription in the existing NU - in recent years there is a level of over-subscription equivalent to more than double the places, at first preference;
- Another significant reason for seeking the change is to assist the school in reducing the bureaucratic burden related to managing and governing under two separate funding and governance mechanisms, thereby supporting the school to deliver improved outcomes for children and to become a more sustainable school;
- The school's BoG believes that the proposed and existing provision at the school, in conjunction with the proposed future development highlighted in the DP, will ensure compliance with DE's Sustainable Schools Policy;

- The school wants to match the provision in the NU with the two-form entry in the primary school, and deal with a high level of over-subscription in the NU. Approval would support the growth of the newly approved two-form entry in the primary school;
- Outcomes for children within NUs have been shown to be a higher quality than those within playgroups (Effective Pre-school Provision in NI research - EPPNI);
- Would argue that transition and continuing professional development are both more easily achieved in a NU setting than a voluntary playgroup;
- It would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion;
- The conversion of the existing (non-PEAG funded) playgroup at Mill Strand IPS would represent replacement rather than displacement of an existing playgroup, owing to the playgroup already accommodating 23 children in both 2017/18 and 2018/19;
- In the case of the Portrush area, there has been no substantial impact on other settings since the opening of Mill Strand IPS Pre-School Playgroup. The Case for Change showed the applications and admissions in 2017/18 in a two and three mile radius and demonstrated a shortfall in provision at first preference and when considering total applications;
- Given that Mill Strand IPS has provided the 23 extra non-funded places in the playgroup in both 2017/18 and 2018/19, this may be masking a further unmet demand for places;
- Only the statutory provision in Mill Strand IPS is providing a religiously integrated provision with representation from Protestant, Roman Catholic and other backgrounds;
- In July 2018 the EA website indicated that there were no spare pre-school places in the 'Triangle' area. This would indicate that a review of provision is required to better meet the needs of children and families. However, this does not negate the need to deal with demonstrated parental demand for integrated pre-school places;
- Of the other closest integrated settings, only one has a NU which is oversubscribed. All the schools serve catchment areas which are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, is a realistic option for parents seeking integrated provision;
- Supporting this expansion of pre-school provision would be a low cost and positive step to support a currently sustainable integrated school and would remove an obstacle to supporting its possible further growth in years to come;
- It would also help those who wish to choose an integrated option and address any shortfall for pre-school places in the area as well as providing additional places for those who are arriving at school without pre-school experience;
- The school draws from wards which have been affected by the conflict and research is beginning to expose the trans-generational aspects of the troubles.
- This proposal therefore represents a positive move forward for the whole school community;
- Urges the Department to support this proposal in recognition of the Department's duty under the Education Reform Order (1989) to "*encourage and facilitate integrated*

education", amplified in the Department's letters of 31 October 2017 and 15 January 2018; and

- The Department's letter of 15th January was clear in referring to the 'standalone concept' of integrated education and there is no alternative integrated provision in the area.

CSSC Comments

45. The CSSC comments submitted in relation to the proposal are reproduced in full at Appendix D and includes the following points:

- Consulted in respect of this proposal and recognises the potential for this DP to impact negatively on the sustainability of controlled nursery and primary schools in the area;
- Welcomed DE's decision on DP 484 and states that it is not apparent from the Case for Change that additional or new information is presented in support of the new proposal;
- This DP raises concerns in relation to the efficient use of resources and the anxiety that the proposal brings for neighbouring schools;
- Recognises the concerns of the PEG and the EA in relation to the proposal;
- Express concern that the proposal is not based on assessed need but would appear to be a driver for ensuring the primary school achieves maximum capacity, without due consideration of the potential impact on the sustainability of other neighbouring schools;
- Understands that enrolments in existing voluntary pre-school providers within the area have declined since the establishment of additional pre-school places at Mill Strand in September 2015, funded by the Integrated Education Fund. They state that the influence of provision established outside the statutory planning framework needs to be considered to fully understand the impact this is having on the sustainability of existing community provision in the local and wider geographical area, including Coleraine;
- Raises issues with information contained in the Case for Change including assessments used to assert that there is a shortfall in pre-school provision in the area;
- Strongly endorses the non-sectoral nature of pre-school education and notes that there has been a long history of cross-community pre-school provision in the area and an inclusive ethos within local schools, including well established Shared Education links between schools;
- Questions if it can be determined with confidence that over-subscription in Mill Strand NU demonstrates parental demand for integrated education or if it is possible that the over-subscription in Mill Strand and Portstewart NUs demonstrates parental demand for a full-time nursery place;
- Excellent transition programmes exist within all pre-school settings and primary schools in the area to ensure all children experience a smooth transition from pre-school to primary school regardless of the setting from which they are transferring from or enrolling in;
- Acknowledges the Department's duty in relation to integrated education, but states that this duty must be considered in conjunction with other statutory duties, including Shared Education and the duty to avoid unreasonable public expenditure;

- Shares the concerns expressed by EA that the implementation of this proposal will result in increased costs for existing provision which is already in excess of demand; and
- State that if the duty to encourage and facilitate the development of integrated education trumps all others, there would be no legal basis for the publication of a DP which seeks the views of others on the impact of the proposal.

CSSC meeting with Permanent Secretary (22 August 2018)

46. The CSSC included a request to discuss its response with the Department. You held a meeting with CSSC officials on 22 August 2018 during which they presented a briefing note which is reproduced in full at Appendix D, along with a note of the meeting, the content of which has been agreed with the CSSC. At the meeting the CSSC reiterated the points set out above and also commented on the concept of meeting 'demonstrated parental demand' which it considers "*does not appear consistent with the Department's duty under Article 44 of the 1986 Order to educate in accordance with the wishes of parents as far as it is compatible with the provision of effective teaching and learning and the avoidance of unreasonable public expenditure*".

Education and Training Inspectorate (ETI) Comments

47. ETI comments on the proposal are reproduced in full at Appendix C. The ETI note that there are a number of schools in the immediate area around Portrush and Portstewart and that these schools and those in the wider area provide well for the children in this locality. Competition to attract children is very keen and, as a consequence, providing a pre-school provision can help attract applications for P1. Consequently, this DP has significant wider ramifications.

48. ETI acknowledges that the school is currently a popular option for many parents and that the pre-school provision is over-subscribed. ETI also notes that there is the potential for an adverse impact on some of the neighbouring early years providers, particularly those who are under-subscribed at present. If the proposal is approved, there would be a need to confirm that the out-workings do not impact adversely on neighbouring providers and that the current accommodation on the Dhu Varren site is adequate for any additional children.

49. The ETI recognise, however, DE's responsibility to facilitate the availability of integrated education opportunities to children and their parents.

SUSTAINABILITY ASSESSMENT

50. The SSP does not apply to pre-school provision. However, it is important when considering the establishment of statutory pre-school provision that the host school is assessed. An assessment of Mill Strand IPS against the six SSP criteria and their associated indicators follows.

CRITERION 1: Quality Education Experience

51. An ETI Inspection of the school in February 2012 assessed the quality of education provided in the primary school and NU as 'Good'. The Inspection Report stated "*In the areas inspected, the quality of education provided in the school is good. The school has important strengths in most of its educational and pastoral provision. The inspection has identified an area for improvement which the school has demonstrated the capacity to address. The Inspectorate will monitor the school's progress on the area for improvement*".

52. The Report concluded that the strengths of the school included the quality of the teaching observed, almost all of which was good or better; the good standards achieved by most of the children in English and mathematics; and the very good quality of the pastoral care for the children, including the good quality of the provision for the children who have special educational needs.

53. ETI comments on this DP include that "*District Inspector activity has noted that the school has progressed well since its last inspection. There has been a change in personnel and the school seems to have improved in some areas. The classes are all quite large; however, the teachers cope well with securing engagement and most secure effective or very effective learning. The data provided by the school show a diminishing trend of underperformance. The principal works alongside a pro-active BoG. Since the last inspection, the school has definitely come forward in many areas.*"

54. The ETI carried out an inspection in January 2019, however, owing to the impact of the action short of strike being taken by the staff, the ETI was unable to assure parents/carers, the wider school community and stakeholders of the quality of education being provided for the children.

Composite Classes

55. 2018/19 statistics confirm that Mill Strand IPS does not operate any composite classes.

Teaching Staff

56. The school employs 12 full-time equivalent teachers which is significantly above the minimum number specified in the SSP indicator which states that a primary school should have a minimum of four teachers.

Special Educational Needs

57. The 2012 Inspection Report states that "*The school identifies well, and at an early stage, the children who would benefit from additional support with aspects of their learning. The school's performance data and the outcomes from the IEPs (Individual Education Plans) demonstrate that the children with SEN are making good progress in their learning and are achieving in line with their ability.*"

Curricular/ Extra-Curricular Activities

58. The ETI Report commented that "*The planning across the curriculum provides an effective framework for progression and helps to ensure coherence in the children's learning.*"

It also states that, “All of the teachers have responsibility for the co-ordination of significant curricular areas and are suitably experienced and committed...”

59. The Report notes that “The children’s learning experiences are enhanced by a range of educational visits, visitors to the school and creative collaborations with the local theatre. In addition, the school makes excellent use of local and natural resources and the appealing extra-curricular provision includes surfing, golfing and outdoor pursuits.”

Physical Environment

60. DP 483, approved in July 2017, provided for a double entry to Mill Strand IPS. The Case for Change states that DE was working with the school to provide a double modular unit of two classrooms on site for September 2018, with a further unit planned for September 2019 and that these classrooms, together with existing accommodation, will provide adequate accommodation for the growing school population until the completion of the new build.

61. As referred to earlier in this submission, the Department is proposing to build a 14 class base school and single NU, under the Fresh Start programme announced in March 2016. The current estimated construction costs are £4.25M, with an estimated 15 month construction period once the business case and statutory approvals are received.

CRITERION 2: Stable Enrolment Trends

62. Mill Strand IPS has an approved admissions and enrolment number of 58 and 260 respectively for 2018/19. The school’s enrolment is significantly above the recommended minimum enrolment of 105 pupils for a sustainable rural primary school under the SSP, as shown in Table 7 below. The approval of DP 483 in July 2017 allowed for a double class intake (admissions number increased from 30 to 58) via an annual phased increase in the school’s enrolment number from 232 up to 406, commencing in September 2018. As Table 8 below shows, enrolments in P1-P3 exceed those in P5-P7.

Table 7: Mill Strand IPS - Historical Enrolments Years 1-7 (includes statemented pupils)

2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
179	184	187	218	248	271

Table 8: Mill Strand IPS - Enrolment by Year Group 2018/19 (includes statemented pupils)

P1	P2	P3	P4	P5	P6	P7	Total
47	50	52	31	29	31	31	271
149				91			

Temporary Variations

63. If a school receives more applications for admission than it has places available it can request a Temporary Variation (TV) of its admissions and/enrolment number from the

Department. The Department may approve TVs to a school's numbers to respond to particular demographic pressures in an area in a particular year.

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

65. It should be noted that a TV is granted on the condition that no additional accommodation will be involved. TVs are not granted to address anticipation of demand, nor a long term desire to increase the size of a school within an area.

66. P1 intakes to Mill Strand IPS in the last five years are set out in Table 9. TVs to the admissions number were approved in 2014/15 and 2016/17 and to the admissions and enrolment numbers in 2017/18. The school is currently in a state of phased growth and continues to be popular. There are no issues under the stable enrolment trends criterion, as the school continues to demonstrate an enrolment well above the minimum enrolment threshold for a sustainable rural primary school.

Table 9: Mill Strand IPS - P1 Intakes

2014/15	2015/16	2016/17	2017/18	2018/19
32	28	53	52	47

CRITERION 3: Sound Financial Position

67. 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.

68. All schools receive a delegated budget for the financial year on the basis of verified enrolments as at the time of the October Census prior to the financial year. The school received a total delegated budget of £820,797 in the 2018/19 financial year for 274 Full-Time Equivalent (FTE) pupils (248 primary and 26 full-time NU pupils). This generates a per capita of £2,996³ which compares to an average for all primary schools of £2,978.

69. The Case for Change advises that "*the school is currently operating with an acceptable budget surplus and that its three year financial plan has been carefully budgeted by the Principal to allow for continued growth and to maintain the high standards currently in the school*". It also mentions that the school "*...is delighted to have a hard working Parents' Council that contributes greatly to the social and financial support of the school*".

³ The school's delegated budget included £55,446 for Landlord Maintenance and Administrative costs factor funding, not applicable for controlled or maintained schools.

CRITERION 4: Strong Leadership and Management

70. The 2012 ETI Inspection Report states that the overall quality of leadership and management of the school is 'good'. The Report states that the Principal "...provides very good leadership and management. He knows well the children, their families and the community they come from. He maintains a clear overview of development work to bring about whole-school improvement, and is supporting and building the capacity of the teachers as effective co-ordinators. He values well the commitment and skills of all the staff and is very knowledgeable, supportive and appreciative of their contributions." Also that he is "committed to embedding a culture of self-evaluation leading to continual improvement and has made excellent progress in using performance data to inform and improve learning and teaching".

71. The ETI reported that the BoG "is committed and professional in approach [and]...carry out their governance role with endeavour and conviction. They are continuing to develop their monitoring and evaluating roles and demonstrate clearly their commitment to the development and improvement of the school and its place in the community".

CRITERION 5: Accessibility

72. Mill Strand IPS is the only integrated primary school serving the 'Triangle' area, the nearest integrated primary school being Ballymoney CIPS, almost 13 miles away. Map 2 above shows the location of pupils attending Mill Strand IPS and NU and confirms that the majority of pupils come from Portrush, Portstewart, Coleraine and the surrounding area. Whilst most of the pupils live within 5 miles of Mill Strand IPS, some children travel more than 5 miles to school from outlying rural areas, particularly to the south of Coleraine. The travel time for most pupils would be less than the 30 minutes (i.e. one hour per day in total for primary pupils) as detailed in the SSP.

CRITERION 6: Strong Links with the Community

73. One of the strengths of the school mentioned in the 2012 ETI Inspection Report was the "very good quality of links and partnerships established with the local and wider community, which benefit the children". The Report commented on the links the school has with neighbouring schools through the 'Creative Change' project and also through work in STEM (science, technology, engineering and mathematics) in conjunction with the University of Ulster.

74. The Case for Change reports that "The school regularly utilises local businesses and venues to host school events, functions and plays" and comments on the numerous well-supported and innovative community events held every year by the strong and vibrant Parents' Council.

Sustainability Summary

75. The school's enrolment is well above the minimum enrolment threshold of 105 pupils for a sustainable rural primary school as set out in the SSP, with admissions to the school in

the last two years moving towards a double class intake and the recently approved increase in the admissions number to 58.

76. The Case for Change indicates that there are no financial concerns regarding this school. The 2012 ETI Inspection Report states that the overall quality of leadership and management is 'good'. The majority of pupils live within a five mile radius of the school and, as evidenced by the ETI and in the Case for Change, the school has established very good quality of links with the local and wider community which benefit the children.

77. In summary, Mill Strand IPS is a popular, viable and sustainable school providing good quality of education to its pupils and is considered to be meeting all six of the SSP criteria.

78. The school already manages the existing NU. It was also inspected by the ETI in 2012, at which time the quality of education provided was assessed as 'good'. There are no concerns, therefore, about the school's capacity to manage the proposed additional part-time nursery places.

ANALYSIS OF SPECIAL CONSIDERATIONS

Statutory Duties

(i) Integrated Education

79. The Department has written to the statutory planning authorities⁴ reminding them of the need to support DE in the fulfilment of the duty to encourage and facilitate the development of integrated education, 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.

80. The Department must also be mindful of the ruling by Treacy J in the Judicial Review *McKee v Department of Education*, 2011. Although the ruling was in relation to Irish-medium education, the Department considers that the same principle applies to integrated education⁵. He said:

"the Department may facilitate and encourage the Irish-medium sector in ways that it need not for other sectors by:

- *Taking positive steps; or*
- *Removing obstacles which inhibit the statutory objective".*

81. The Case for Change asserts that this DP would address parental demand for integrated pre-school education in the 'Triangle' area, evidenced by the oversubscription for the 26 places in the NU over the past few years. It states that consultation with the school's

⁴The Department's letter of 31 October 2017 referred to in footnote 2 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.

⁵ In a minute of 19 December 2013 from John O'Dowd, MLA (then Minister of Education) he stated that the judgment has implications for DE's duty to integrated education alongside its duty to Irish-medium.

Parents Council had highlighted parental concerns regarding the level of oversubscription at both the primary school and NU and that the submission (and subsequent approval) of DP 483 in 2017 was to address oversubscription in the primary school. The opening of the IEF funded independent pre-school playgroup in September 2015 was to address the oversubscription in the NU which the Case for Change claims “*constitutes ‘demonstrated parental demand’ for additional integrated pre-school provision*”. It states that part of the rationale for the current DP is to support the Department “*by assisting in its duty ‘to encourage and facilitate the growth of integrated education’*” and that there is no local alternative for parents seeking an integrated education for their children. Approval of the additional nursery provision, it states, would increase accessibility to integrated education and strengthen the position of the school in the Portrush area.

82. In its submission, NICIE states that approval of this DP would be a “*low cost and positive step to support a currently sustainable integrated school and would remove an obstacle to supporting its possible further growth in years to come*”. NICIE urges the Department to support the proposal in recognition of the Article 64 duty which it states was “*amplified in the letters from DE of 31st October 2017 and 15th January 2018*”. It states that “*whilst the 31st October letter gave helpful clarification on ‘demonstrated parental demand’ which this proposal shows, the 15th January letter was clear in referring to the ‘standalone concept’ of integrated education and there is no alternative integrated provision in the area*”.

83. The Department’s letter of 31 October 2017 to the statutory planning authorities 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*’.

84. Further clarification was set out in the Department’s letter of 15 January 2018 that Treacy J 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*’.

85. Demand for Integrated pre-school provision in the area is considered in more detail under ‘Other Considerations’.

(ii) Effective and Efficient Use of Public Funds

86. In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it. In light of this, it aims to maximise available pre-school places for target age children, avoiding 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 admissions number.

87. Statistics for the last four years show that there have been up to 30 underage children attending statutory pre-school settings within a five mile radius of Mill Strand IPS (up to 45 if we include Irish Society PS & NU, for completeness, as it is within the town of Coleraine). The vast majority of the underage children have attended Kylemore NS in Coleraine which has a history of accepting underage pupils - the school has 26 underage children in 2018/19. Irish Society PS & NU has a fluctuating pattern of accepting underage pupils and has 15 in 2018/19. Both schools offer part-time pre-school places. Portstewart PS & NU, which offers full-time places, also has ■ underage children in this academic year, the first time since 2013/14 that the school has accepted underage pupils.

88. The majority of Mill Strand IPS statutory NU's pupils in 2017/18 came from Portrush, with less than 25% from the other two 'Triangle' area towns. Information obtained from the school via NICIE indicates that, of the 23 (target age) children in the playgroup in 2017/18, around 60% came from outside Portrush town and over 80% of the 23 (target age) children enrolled in the playgroup in 2018/19 come from outside the town. The additional independently funded full-time pre-school places allow the school to draw more children from a wider catchment area beyond Portrush. This may be an indication of demand for integrated education and/or full-time nursery places. The additional places provided at Mill Strand playgroup over the last number of years do not appear to have led to a substantial increase in the number of underage children accessing (the mostly part-time) places in other statutory pre-school settings within a five mile radius.

89. Any increase in pre-school places may result in a further increase in the number of underage children accessing statutory pre-school provision in the area, thus increasing the amount of public expenditure required and not therefore making the best use of available resources. However, as the playgroup session currently provided is full-time, and any statutory provision established would be part-time, it is not clear what impact, if any, this would have on the level of applications to the setting.

(iii) Shared Education

90. The Case for Change states that the PEG has strong concerns in regard to the potential impact of the proposed additional provision on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education. A number of the public consultation responses also mentioned a history of cross-community pre-school provision in the area and an inclusive ethos within local schools, including shared education. While acknowledging the Department's duty in relation to integrated education, some letters of objection state that this must be considered alongside the Department's other duties, including that to encourage, facilitate and promote shared education. None of those who mentioned Shared Education in their responses referred to specific Shared Education partnerships in the

area or provided detail or evidence on any potential detrimental impacts on existing Shared Education provision.

91. The main impact which any DP would have on Shared Education in a local area would be a possible increase or reduction in the numbers of children and young people engaged, most likely due to displacement of pupils between school(s) which participate in Shared Education projects and those which do not.

92. As detailed in paragraph 26 above, there are three partnerships in Coleraine (one of which involves nursery children) currently receiving funding under the DSC SESP and one partnership in Portstewart being funded under the Peace IV Shared Education Programme. Mill Strand IPS is not currently involved in either programme. Without specific information on the potential impact on the existing partnerships, it can only be assumed that concerns might be around the possible displacement of pupils from schools, currently involved in the partnerships, to Mill Strand IPS and a corresponding drop in the number of pupils involved in Shared Education programmes in the area. Given that there is currently only one partnership (in Coleraine) involving nursery children, the proposal is considered unlikely to impact, provided there is no displacement from the existing nursery settings involved in the Shared Education Programme. There may be other issues relating to individual partnerships which are not known at present. However, the lack of information on potential displacement of pupils means that only a general assessment of any implications for Shared Education provision in the area is possible.

93. The current DSC SESP partnerships are about to begin the final year of a three year programme and implementation of the Peace IV Shared Education programmes has commenced, and as future plans for Shared Education in the area are not yet clear, it is not possible to make an informed assessment on the local impact of the proposal on Shared Education.

Policy Context - Early Years

94. 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. The Case for Change focuses, in the main, on parental preference for pre-school education places with an integrated management type, rather than unmet demand for pre-school education generally.

95. The pattern of pre-school applications to Mill Strand IPS NU suggests that parents in the area may have a preference for pre-school education provision with an integrated management type over pre-school education provision of other management types.

96. 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.

97. The Case for Change states that, in addition to the significant oversubscription at Mill Strand IPS NU, Portstewart PS NU is also heavily oversubscribed. Statistics for 2017/18 are presented for pre-school providers within a 2 and 3 mile radius of Mill Strand IPS i.e. in Portrush and Portstewart, although one of the pre-school providers in Portstewart is not included in the table. The Case for Change contends that there is a shortfall in pre-school provision in the area and 'masking' of actual demand and provision because pupils in the Mill Strand IPS independent playgroup are not included in official figures.

98. The NICIE commentary states that there has been no substantial impact on other settings in the Portrush area since the opening of Mill Strand IPS pre-school playgroup and that the admission of underage children to statutory provision has not been a significant factor in this area. It states that it would appear that Mill Strand IPS NU has in recent years met a previously unmet demand and argues that displacement is not an issue for this proposal as Mill Strand's playgroup has accommodated 23 children in both 2017/18 and 2018/19.

99. However, the additional places offered in the playgroup enable the school to accept more pre-school children from outside Portrush and therefore from the wider 'Triangle' catchment area of the school. It is not clear what impact, if any, would occur in the level of applications if the current full-time provision was replaced by a statutory part-time session, and the school's commitment to accommodate all first preference applications was removed.

100. All the letters of objection received during the statutory objection period expressed concerns that the proposal would have an adverse impact on other providers in the area. PEG stated that existing non-statutory providers currently have spare capacity within their settings and are not operating to maximum registration and that, if an additional NU is approved, displacement may occur for these settings. The EA has stated that the existing provision is already in excess of demand.

Rural Considerations

101. 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.

102. 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).

103. 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”.

104. This proposal relates to the establishment of additional pre-school provision and would not therefore be removing any educational services from the Portrush area. A significant number of underage children continue to be enrolled in one of the nursery schools in Coleraine, from where Mill Strand IPS also draws its pupils, meaning that pupils in the wider ‘Triangle’ area are not currently being denied access to pre-school education. Should this DP be approved, additional pre-school places would be available in this rural area.

OTHER CONSIDERATIONS

Religious Balance

105. 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'.

106. Tables 10 and 11 below confirm that, in terms of the religious balance of pupils, Mill Strand IPS has a very mixed enrolment at primary level, with similar percentages of pupils from both Protestant and Roman Catholic backgrounds. The number of children from ‘Other’ backgrounds has been increasing over the four year period. In the NU, the percentage of children from a Protestant background had declined from 2015/16 to 2017/18 but has risen in this academic year – the reverse is true in terms of the percentage of pupils from a Roman Catholic background. In the last two years, over half the pupils in the NU were from ‘Other’ backgrounds.

Table 10: Mill Strand IPS Religious Balance Years 1-7 2015/16 - 2018/19

School Year	Protestant	%	Roman Catholic	%	Other	%	Totals
2015/16	59	31.6	68	36.4	60	32.0	187
2016/17	64	29.4	64	29.4	90	41.2	218
2017/18	67	27.0	66	26.6	115	46.4	248
2018/19	60	22.1	67	24.7	144	53.1	271

Table 11: Mill Strand IPS NU Religious Balance 2015/16 – 2018/19

School Year	Protestant	%	Roman Catholic	%	Other	%	Totals
2015/16	12	41.4	6	20.7	11	37.9	29
2016/17	10	37.0	7	25.9	10	37.0	27
2017/18	#	#	*	*	#	#	26
2018/19	#	#	*	*	#	#	28

107. NICIE’s commentary on this DP notes that whilst the Department has asserted that pre-school provision is non-sectoral in nature, statistics show that very few pupils from the Roman Catholic tradition attend controlled NUs and schools and even fewer pupils from the Protestant tradition attend Roman Catholic maintained schools and NUs attached to Roman Catholic maintained schools.

108. The schools and the playgroup who responded during the statutory two month objection period highlighted that all pre-school provision is cross-community and/or non-sectoral and some also stated that there is a history of cross-community pre-school provision in the area. Statistics showing the religious balance for the local pre-school providers are set out in Table 12.

Table 12: 2018/19 Religious Balance Statistics

Pre-School Provision	Protestant	%	Roman Catholic	%	Other/ Not known	%	Total
Statutory Nus							
Mill Strand IPS	#	#	*	*	#	#	28
Portstewart PS	#	#	*	*	#	#	26
Harpur’s Hill PS, Coleraine	11	36	0	0	19	64	30
Irish Society PS, Coleraine	25	49	5	10	21	41	51
Statutory NSs							
Ballysally NS, Coleraine	#	#	*	*	#	#	52
Kylemore NS, Coleraine	42	40	39	37	25	23	106
Non-Statutory Pre-schools (PEG funded places only)							
Portrush Pre-School Community PG	0	0	0	0	26	100	26
Causeway Pre-School, Portrush	0	0	0	0	21	100	21
St Colum’s Pre-School Centre, Portstewart	0	0	17	70	7	30	24
Stepping Stones Creche, Portstewart	0	0	0	0	9	100	9
Watt Fun Community PG, Coleraine	#	#	0	0	*	*	24

Millburn Community Pre-School PG, Coleraine	24	100	0	0	0	0	24
Sunshine PG, Coleraine	0	0	0	0	24	100	24
St Malachy's PG, Coleraine	0	0	#	#	*	*	20
Playhouse Activity Centre, Coleraine	16	67	8	33	0	0	24

109. This shows that, as well as Mill Strand IPS, very few of the pre-school settings in the area have a reasonably mixed enrolment – Kylemore NS and Playhouse Activity Centre, in particular. There are also significant numbers of children from ‘Other/Not Known’ backgrounds.

EPPNI Research

110. The NICIE commentary on this DP 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*”.

Governance and Administration of Pre-school Provision at Mill Strand IPS

111. The Case for Change states that part of the rationale for this DP is to allow the school to run more efficiently and effectively under one funding, management, registration and inspection stream. NICIE supports the school in making this request to reduce the bureaucratic burdens on the school, stating that operating a NU and a playgroup requires different management structures and different inspection bodies for what is effectively identical provision. The Case for Change highlighted that the NH&SCT, (the registering authority for the playgroup) requires the school to adhere to a number of procedures as part of their requirements. In practice, this means that the school cannot allow the children in the playgroup to mix with the children in the statutory NU except for the school nativity, as long as an appropriate risk assessment is in place.

112. The Case for Change argues that approval of the DP would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and SEN and inclusion. It states that the importance of early intervention and support has been underlined in the Chief Inspector’s Report 2012-2014 and cannot be overstated, particularly regarding educational outcomes. Approval of the 26 additional part-time nursery places would enable the school to ensure that all pupils entering Year 1 the following year would not only have had access to an equally high quality of pre-school provision but also equality of early identification of needs and intervention, raising the long-term educational outcomes for the pupils concerned.

Financial Implications

113. Any new provision (including new NUs) opening during the year would be funded from the Department's "New Schools and Units" fund. A new 26 part-time NU is estimated 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 ASB are estimated to be approximately £55k for new provision.

Capital Funding

114. The Case for Change states that, as the school has already put in place a facility for pre-school children, no additional physical work or resources are required – the school would continue to operate with 52 nursery places in its existing accommodation at Dhu Varren, pending the completion of its new build.

115. The new build project currently allows for one NU but can be designed in such a way to ensure a double NU can be included if the DP is approved. Subject to the availability of budget cover and the necessary approvals, the Department will consider meeting the additional cost (anticipated to be in the region of £200k) from within DE's capital budget.

Staffing Costs

116. If the proposal is approved, additional unquantified funding will be required for salaries and overhead costs but this would be met from the school's delegated budget.

Assessed Need for Pre-school Provision in the Area

117. 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.

118. 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 demand for pre-school education provision in the area.

Provision in the Area

119. There have been no significant changes to the level of pre-school education provision in this area in recent years.

120. 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. As the playgroup

session at Mill Strand IPS is not PSEP funded provision, it is not included in the tables below, either before or after the proposed change, but it is taken into account in the analysis of the tables.

Table 13: Level of Provision – 2 mile radius of Mill Strand 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	26	44	0	70	110	63.6%	0
2017/18	26	32	0	58	102	56.9%	0
2018/19	26	47	0	73	103	70.9%	0
Proposed	52	47	-	99	103	96.1%	--

121. Based on the 2018/19 provisional data the level of provision within the two mile radius is currently significantly lower than the planning figure. However, if the proposed statutory provision were made available this would increase to 96.1% which is only just above the planning figure. This would suggest that pre-school education in the area may be insufficient to meet demand. The EA has advised that in both 2016/17 and 2017/18, there was one child who remained unplaced at Stage One; no further preferences were received at Stage Two therefore both children remained unplaced. No children were unplaced in the area at the end of the 2018/19 admissions process.

122. The EA has further advised that there is increased current demand for pre-school places in the area and advises also that existing non-statutory providers have capacity to increase intake to meet this pressure. In addition, NISRA statistics show that there may be a reduction in pre-school population in the longer term.

123. The playgroup session at Mill Strand IPS is not reflected in the table above. The Case for Change states that this session is attended by 23 PSEP target age children who do not avail of a PSEP place. This suggests that there may be an additional element of demand for pre-school education provision in the area that is not reflected in the figures above, and is not currently met by the PSEP.

Table 14: Level of Provision – 5 mile radius of Mill Strand 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	234	170	0	404	465	86.9%	23
2017/18	234	156	0	390	424	92.0%	21
2018/19	234	198	0	432	408	105.8%	23
Proposed	260	198	--	458	408	112.2%	--

NB this table does not include figures for Irish Society PS & NU as it is outside the 5 mile radius. The information in the table is consistent with how DE would normally assess the level of provision.

124. Based on the 2018/19 provisional data the level of provision within the five mile radius is above the planning figure. If approved, the additional statutory provision would bring the level in the five mile radius to 112%. This would suggest that sufficient pre-school education is already in place to meet demand in the wider area. The numbers of underage children accessing pre-school education places in the five mile radius would support this assumption. It is noted that all the underage children are enrolled at the same setting, located at the limit of the five mile radius.

Quality of Education in Alternative Pre-school Provision

125. Table 15 below summarises information on the quality of education at pre-school settings in the area, as assessed by the ETI. The assessments of overall effectiveness range from 'good' to 'a high level of capacity for sustained improvement in the interest of all the learners', confirming the statement made by the ETI in their comments on this DP that "the schools in the wider local area provide well for the children in this locality".

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

Ref No	Setting	ETI Assessment
	Nursery Units	
306-6544	Mill Strand IPS & NU	Feb 2012 - Good Jan 2019 – Action Short of Strike
301-2250	Portstewart PS & NU	May 2016 - High level of capacity for sustained improvement
301-6052	Harpur's Hill PS & NU, Coleraine	Nov 2015 - High level of capacity for sustained improvement Sept 2018 – Sustaining Improvement Inspection – Action Short of Strike
301-6264	Irish Society PS & NU, Coleraine	April 2016 - Demonstrates the capacity to identify and bring about improvement
	Nursery Schools	
311-6263	Ballysally NS, Coleraine	May 2010 - Good
311-6215	Kylemore NS, Coleraine	June 2017 - High level of capacity for sustained improvement
	Pre-Schools	
3BB-0367	Portrush Pre-School Community PG	Sept 2015 - Demonstrates the capacity to identify and bring about improvement
3CA-0631	Causeway Pre-School, Portrush	June 2016 - Demonstrates the capacity to identify and bring about improvement
3BB-0369	St Colum's Pre-School Centre, Portstewart	June 2017 - Demonstrates the capacity to identify and bring about improvement
3CB-0486	Stepping Stones Creche, Portstewart	Oct 2017 - Demonstrates the capacity to identify and bring about improvement
3AB-0130	Watt Fun Community PG, Coleraine	May 2016 - High level of capacity for sustained improvement
3AB-0248	Millburn Community Pre-School PG, Coleraine	Dec 2015 - Demonstrated the capacity to identify and bring about improvement
3AB-0585	Sunshine Playgroup, Coleraine	Jan 2016 - High level of capacity for sustained improvement
3AB-0096	St Malachy's PG, Coleraine	June 2017 - Demonstrates the capacity to identify and bring about improvement
3AB-0260	Playhouse Activity Centre, Coleraine	June 2016 - High level of capacity for sustained improvement

Temporary Flexibility

126. There were no temporary flexibility requests in the area approved for the 2016/17 or 2017/18 academic years. In April 2017, Mill Strand IPS NU made a temporary flexibility request for four additional places for the 2017/18 school year. This was not supported by the PEG on the grounds that additional pre-school education places are not required to meet a shortfall in the area and the request was not approved.

127. There was one temporary flexibility request approved for the 2018/19 academic year. Cuilrath Corner NU (Harpur's Hill PS) had a request approved for two additional places.

Reception Provision in the Area

128. One setting within the five mile radius, St Malachy's PS (which has no statutory NU), previously provided reception places in 2014/15 and 2015/16 (4 and 8 places respectively). Reception provision ceased from the 2016/17 academic year, therefore reception provision is not a consideration in relation to this proposal.

Demand for Integrated Pre-school Provision in the Area

129. The Case for Change states that part of the rationale for this proposal is to address the mismatch in admissions between the two-form entry in the primary school and the single unit entry in the NU which, it is stated, would support the school in delivering improved outcomes for children; a smoother transition; in becoming a more sustainable school; and assist the Department in its duty to encourage and facilitate the growth of integrated education.

130. 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 schools⁶.

131. As can be seen from Table 16 there has been a significant demand for the 26 available places at Mill Strand IPS NU which has been oversubscribed at first preference stage for the last 4 years. The table shows the first preference applications to the NU and other pre-school settings in the area, differentiating between pupils in their immediate pre-school year and those who are underage. It is also evident that other pre-school settings offering full-time places are regularly oversubscribed in terms of first preference applications.

132. In 2017/18 the NU received 50 first preference applications and 53 for 2018/19, the first time that Mill Strand IPS NU received total applications up to or beyond the number proposed by this DP i.e. a total of 52. The EA has advised that, as at March 2019, the school has received 52 first preference applications for the NU for 2019/20.

⁶ This is an extract from the Department's letter of 31 October 2017 referred to previously, and it was also repeated in the letter of 15 January 2018.

133. There are no other pre-school education settings of an integrated management type in the local area; the closest integrated primary school, Ballymoney CIPS, is almost 13 miles away and does not have a NU. Ballycastle CIPS has a NU but is almost 19 miles from Portrush.

134. The level of oversubscription at Mill Strand IPS NU over the last four years suggests that parents in the area may have a preference for pre-school education provision with an integrated management type. The Case for Change provides further indications of this parental preference, as it advises that all unsuccessful applicants to the statutory pre-school education setting at Mill Strand IPS chose to enrol in the non-PSEP playgroup session rather than avail of PSEP funded education provision in a non-integrated management type setting elsewhere.

135. Correspondence received by the Department during the statutory two month objection period queried whether the oversubscription of pre-school education places at Mill Strand IPS could properly be attributed to parental preference for pre-school education with an integrated management type, suggesting that it could, instead, demonstrate a preference for full-time pre-school education provision. It is possible that parents choose the setting for a number of reasons, including, but not limited to, the fact that it offers full-time provision and that it has an integrated management type.

Table 16: EA Pre-School Intakes Information

DE Ref No	Funded Provider	2014/15 Approved Number	Total 1 st Pref Apps			Total Accepted for Adm			2015/16 Approved Number	Total 1 st Pref Apps			Total Accepted for Adm			2016/17 Approved Number	Total 1 st Pref Apps			Total Accepted for Adm			2017/18 Approved Number	Total 1 st Pref Apps			Total Accepted for Adm		
			Tar. Age	Tar. Age	Under Age	Tar. Age	Under Age	Tar. Age		Under Age	Tar. Age	Under Age	Tar. Age	Under Age	Tar. Age		Under Age	Tar. Age	Under Age	Tar. Age	Under Age	Tar. Age		Under Age	Tar. Age	Under Age	Tar. Age	Under Age	Tar. Age
306-6544	Mill Strand IPS & NU	26 - FT	25	29	0	26	0	26 - FT	41	41	6	26	0	26 - FT	34	36	*	26	0	26 - FT	50	51	9	26	0				
301-2250	Portstewart PS & NU	26 - FT	40	41	5	26	0	26 - FT	29	31	9	26	0	26 - FT	33	33	*	26	0	26 - FT	29	32	*	26	0				
301-6052	Harpur's Hill PS & NU, Coleraine (Cuilrath Corner)	26 - FT	41	41	*	26	0	26 - FT	41	41	8	26	0	26 - FT	38	40	*	26	0	26 - FT	40	43	13	26	0				
301-6264	Irish Society PS & NU, Coleraine	52 - PT	35	39	15	39	13	52 - PT	50	55	12	52	0	52 - PT	33	37	11	33	11	52 - PT	51	55	10	52	0				
Subtotal		130	141	150	#	117	13	130	161	168	35	130	0	130	138	146	#	111	11	130	170	181	#	130	0				
311-6263	Ballysally NS, Coleraine	52 - FT	55	59	16	52	0	52 - FT	69	69	10	52	0	52 - FT	53	55	*	52	0	52 - FT	54	60	14	52	0				
311-6215	Kylemore NS, Coleraine	104 - PT	66	75	45	75	29	104 - PT	77	100	27	100	*	104 - PT	70	84	31	84	20	104 - PT	71	86	30	86	17				
Subtotal		156	121	134	61	127	29	156	146	169	37	152	*	156	123	139	#	136	20	156	125	146	44	138	17				
3BB-0367	Portrush Pre-School Comm. PG		30	32	-	32	-		28	32	-	32	-		32	32	-	32	-		16	22	-	22	-				
3CA-0631	Causeway Pre-School, Portrush		15	18	-	16	-		10	13	-	13	-		15	16	-	16	-		11	12	-	12	-				
3BB-0369	St Colum's Pre-School Centre, Portstewart		14	21	-	21	-		32	35	-	32	-		18	22	-	22	-		8	11	-	11	-				
3CB-0486	Stepping Stones Creche, Portstewart		7	9	-	9	-		8	10	-	10	-		11	14	-	10	-		7	11	-	10	-				
3AB-0130	Watt Fun Community PG, Coleraine		29	30	-	26	-		15	17	-	17	-		14	15	-	15	-		25	26	-	25	-				
3AB-0248	Millburn Community Pre- School, Coleraine		20	25	-	24	-		22	30	-	24	-		28	32	-	24	-		16	30	-	24	-				
3AB-0585	Sunshine Playgroup, Coleraine		0	12	-	12	-		*	17	-	17	-		*	13	-	13	-		12	24	-	12	-				
3AB-0096	St Malachy's Playgroup, Coleraine		19	19	-	19	-		31	31	-	24	-		18	19	-	19	-		24	27	-	19	-				
3AB-0260	Playhouse Activity Centre, Coleraine		21	22	-	22	-		28	31	-	24	-		30	31	-	24	-		26	27	-	24	-				
Subtotal			155	188	-	181	-		#	216	-	193	-		#	195	-	175	-		145	190	-	159	-				
TOTALS			417	472	#	425	42		#	553	72	475	#		#	480	#	422	31		440	517	#	427	17				

DE Ref No	Funded Provider	2018/19 Approved Number	Total 1 st Pref Apps	Total Apps		Total Accepted for Adm	
				Tar. Age	Under Age	Tar. Age	Under Age
306-6544	Mill Strand IPS & NU	26 - FT	53	55	6	26	0
301-2250	Portstewart PS & NU	26 - FT	23	31	*	21	*
301-6052	Harpur's Hill PS & NU, Coleraine (Cuilrath Corner)	26 - FT (28 temp flex)	37	41	*	28	0
301-6264	Irish Society PS & NU, Coleraine	52 - PT	30	41	13	37	13
Subtotal		130	143	168	#	112	#
311-6263	Ballysally NS, Coleraine	52 - FT	67	74	*	52	0
311-6215	Kylemore NS, Coleraine	104 - PT	60	87	29	82	23
Subtotal		156	127	161	#	134	23
3BB-0367	Portrush Pre-School Community PG		27	33	-	26	-
3CA-0631	Causeway Pre-School, Portrush		15	26	-	19	-
3BB-0369	St Colum's Pre-School Centre, Portstewart		22	28	-	24	-
3CB-0486	Stepping Stones Creche, Portstewart		8	12	-	10	-
3AB-0130	Watt Fun Community PG, Coleraine		30	37	-	24	-
3AB-0248	Millburn Community Pre- School, Coleraine		24	29	-	24	-
3AB-0585	Sunshine Playgroup, Coleraine		18	27	-	24	-
3AB-0096	St Malachy's Playgroup, Coleraine		27	30	-	18	-
3AB-0260	Playhouse Activity Centre, Coleraine		41	42	-	24	-
Subtotal			212	264	-	193	-
TOTALS			482	593	#	439	#

The total 1st pref. applications are at Stage 1 which concludes at the end of April annually. The total applications and total admitted are at the conclusion of both Stage 1 and Stage 2 - concludes early/mid June annually.

136. Table 17 below shows the application rates for full-time pre-school education provision within the five mile radius for the 2018/19 academic year. When the playgroup session is taken into consideration, the level of oversubscription for provision at Mill Strand IPS is not higher than average for full-time pre-school education provision in the area and in fact is lower than some other full-time settings, despite the commitment given by the school to “provide fully funded places for all correct age, first choice applicants”.

Table 17: Application Rates for Full-time Pre-school Provision 2018/19

Setting	Number of Places	First preference applications	Oversubscription
Mill Strand IPS	26 (plus 23 in playgroup session)	53	8% (with playgroup) 104% (without playgroup)
Ballysally NS	52	67	29%
Portstewart PS NU	26	23	-12%
Harpurs Hill PS NU	26	37	42%

137. The Case for Change included information on the pre-school experience of the Year 1 intake at Mill Strand IPS over the four year period 2014/15 - 2017/18. This indicates that the majority of children attended either the Mill Strand IPS NU or the school’s non-PSEP session. A maximum of three children per year attended funded pre-school education provision outside Mill Strand IPS, again suggesting that the proposed additional places at the setting may be unlikely to displace any existing pre-school education provision in the area.

138. As has been mentioned previously, Mill Strand IPS has a wide catchment area - almost half of the 2017/18 pupils came from outside the immediate Portrush area and a number of pupils travel from beyond the 5 mile radius of the school, from outlying rural areas particularly to the south of Coleraine. As can be seen from Tables 18 and 19 below, pupils attending the NU and the pre-school playgroup also travel from outside a two mile radius of the school, suggesting that parents may have a preference for pre-school education provision at a school with an integrated management type and are willing to travel a greater distance to access this type of provision.

Table 18: Mill Strand IPS NU - Pupil Locations by Postcode

	2015/16	%	2016/17	%	2017/18	%
Portrush (BT56)	17	58	13	48	20	77
Portstewart (BT55)	6	21}	8	30}	5	19}
Coleraine (BT51 & 52)	*	*	*	*	*	*
Other	*	*	*	*	0	0}
Total	#		#		#	

Table 19: Mill Strand IPS Pre-school Playgroup - Pupil Locations by Postcode

	2017/18	%	2018/19	%
Portrush (BT56)	9	39	*	*
Portstewart (BT55)	9	39}	9	39}
Coleraine (BT51 & 52)	*	*	8	35} 83%
Other	*	*	*	*
Total	#		#	

139. To help inform an assessment of demand for the proposed additional statutory pre-school education at Mill Strand IPS, the EA was asked to comment on supplementary information obtained about pupils who attended, and are attending, the existing non-statutory pre-school (playgroup) setting. The EA has confirmed the following:-

Table 20: Mill Strand IPS Playgroup

Year	Pupils	EA Evidence
2017/18	23 target age pupils attended the playgroup	<p><u>Preferences</u> 21 had Mill Strand IPS NU as their first preference; and 2 had other settings as their first preference.</p> <p><u>Applicants</u> 13 were allocated a place at an alternative (non-integrated) setting; and 10 pupils were not placed.</p>
2018/19	23 target age pupils are attending the playgroup	<p><u>Preferences</u> All had Mill Strand IPS NU as their first preference</p> <p><u>Applicants</u> 17 were allocated a place at an alternative (non-integrated) setting; and 6 pupils were not placed.</p>

140. The data provided demonstrates that in 2017/18, 23 target age children attended the non-PSEP funded session at Mill Strand IPS, and all but two had listed Mill Strand IPS as their first preference setting during the pre-school admissions process. For the 2018/19 academic year, all 23 target age children attending the session had listed Mill Strand IPS as first preference in the pre-school admissions process. However, it is worth noting that, over this two year period, 30 of the 46 children were offered a place at another setting which their parents chose not to accept and ultimately chose a place for their children in the Mill Strand playgroup.

Impact

141. 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. In considering DPs for statutory provision, careful consideration is given to the impact of any new statutory provision on existing good quality voluntary/private pre-school education providers.

142. The Case for Change asserts that the level of oversubscription in the NU demonstrates parental demand for local integrated pre-school education. Information provided in the Case for Change indicates that a substantial majority of the P1 children at the school from 2014/15 to 2017/18 had attended the NU and the pre-school playgroup; only a small number of the P1 children had attended other pre-school settings and a few had no pre-school experience. The Case for Change contends that the number of children in Mill Strand IPS's independently funded playgroup since 2015/16 may have masked actual demand and provision and asserts that there is a shortfall of pre-school provision in the area.

143. Objections to the proposal were received from Watt Fun Community Playgroup, St Patrick's PS, Portrush, Portrush PS and Carnalridge PS. All the objectors claim that the proposal, if approved, would have an adverse impact on the continued viability of other quality pre-school/nursery providers in the area; some further claim that it could lead to the creation of composite classes in other primary schools in the town.

144. The NICIE commentary on this DP argues that displacement is not an issue for this DP as Mill Strand IPS playgroup has accommodated 23 children in both 2017/18 and 2018/19. NICIE suggests that a review of pre-school provision in the wider area may be required to better meet the needs of children and families but that this does not negate the need to deal with demonstrated parental demand for integrated pre-school places to support the growth of the two-form entry at Mill Strand IPS.

145. In their comments on this DP, the ETI noted that the schools in this locality provide well for the children, that competition to attract children is very keen and, as a consequence, providing pre-school provision can help attract applications for Primary 1. The ETI also noted that there is the potential for an adverse impact on some of the neighbouring early years providers, particularly those who are under-subscribed at present and, if the proposal is approved, there would be a need to confirm that the out-workings do not impact adversely on neighbouring providers. The ETI also recognise the Department's responsibility to facilitate the availability of integrated education opportunities to children and their parents.

146. The EA has advised that the setting received 53 first preference applications at stage one of the pre-school admissions process for the 2018/19 academic year for 26 funded pre-school education places. Overall in the wards in the area, the PEG advises that 173 first preference applications have been received for some 152 funded pre-school education places. This suggests that additional provision at the setting could be sustainable.

147. The additional information requested by the Department regarding the non-PSEP funded playgroup is attached at Annex E of Appendix E and outlined in paragraphs 139-140 above.

148. This additional information would appear to demonstrate that part of the potential impact of the establishment of an additional pre-school class at the school could be mitigated, with up to 23 of the 26 additional places potentially being filled by children who may otherwise not avail of PSEP provision. Although, as mentioned in paragraph 140 above, a significant number of these children over the last two years had been offered places elsewhere which they did not take up. However, it is not clear what impact, if any, would occur in the level of applications if the current full-time provision were replaced by a statutory part-time session, and the school's commitment to accommodate all first preference applications were removed.

SUMMARY

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

- The PEG has given qualified support for the proposal, as set out in paragraphs 37-38 above, in the context of the statutory duty to integrated education and demonstrated parental demand;
- The EA noted the guidance provided by the Department and the PEG recommendations but, as described in paragraph 39, is concerned that the implementation of the proposal will result in increased costs for the existing provision which is already in excess of demand;
- Based on the information available and taking into account the statutory duties placed upon the Department, DE's Early Years Team considers the proposed change to be reasonable; and
- Five letters of objection and seven letters of support were received during the statutory two month objection period.

150. 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.

151. This 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

152. The current level of pre-school provision within a five mile radius of Mill Strand IPS (considered a more accurate assessment, given the school's wide catchment area) is above the planning figure of 95%, at 106%, suggesting overprovision. If the additional statutory places were to be approved, this would increase to 112%. This, coupled with the consistent number of underage children accessing statutory pre-school places (30 in 2018/19 within the five mile radius and 45 including Irish Society PS & NU), would suggest that there is already more than sufficient pre-school education provision in place to meet demand in the wider area.

153. Mill Strand IPS's playgroup appears to have been offering full-time places in tandem with the school's NU. Should the additional 26 statutory part-time nursery places be approved, it is not clear what impact, if any, this would have on the level of applications. It would appear from the regular number of underage children in local statutory providers offering part-time places, that parental preference is for full-time nursery provision. This is borne out by the regular pattern of oversubscription at local pre-school settings offering full-time places.

154. There would be additional capital costs associated with approval of this DP. Adding 26 part-time places to the existing full-time NU would necessitate the provision of a double NU in the new build Fresh Start funded scheme currently being designed for Mill Strand IPS, the additional cost of which would be around £200k and may have to be met from DE's capital budget.

155. There would also be additional resource implications. The places provided at Mill Strand IPS's playgroup session have been independently funded outside the PSEP for the last four years and therefore, approval of this DP would create a consequential additional charge of around £55k per year on the ASB. The EA expressed its concern that the implementation of this proposal will result in increased costs for the existing provision. Responses received during the statutory two month objection period referred to the current budgetary climate and the Department's duty under Article 44 to avoid unreasonable public expenditure.

156. Mill Strand IPS is currently the only statutory pre-school provider in Portrush and offers full-time places; the approval of this DP would secure additional statutory places at this setting. The PEG expressed its strong concerns about the potential displacement of existing (good quality) funded pre-school provision in the area. Letters of objection referred to the potential detrimental impact on the sustainability of neighbouring settings, including the possible creation of composite classes in local schools.

157. There is a risk that any detrimental impact on existing funded providers will reduce PSEP's flexibility to respond to local changes in demographics and parental preferences.

Considerations that do lend support to an approval decision

158. Mill Strand IPS is a popular, viable and sustainable school providing good education provision to its pupils. The school meets all six criteria of the SSP. It already manages the existing NU and there are no concerns about the school's capacity to manage the proposed additional part-time nursery places.

159. The level of pre-school provision within the two mile radius of Mill Strand IPS is significantly lower than the planning figure at 71%, suggesting that pre-school education in the area may be insufficient to meet demand. If the proposed additional places were made available, the level of provision would rise to just above the planning figure of 95%. While there is more than sufficient pre-school education provision within the five mile radius to cater for overall levels of demand, there is insufficient provision to meet demonstrated parental preference for pre-school education provision at a school of an integrated management type.

160. The NU at Mill Strand IPS has been consistently oversubscribed at first preference stage for the existing 26 full-time places for four of the last five years, with 50 first preference applications in 2017/18 and 53 for 2018/19. The addition of the independently funded playgroup, which in the last two years has catered for almost 90% of the pre-school places requested in this DP, also provides evidence of demand for additional pre-school education provision at the school. Many young children already travel some distance to the school from outside Portrush and it could be argued that displacement has already occurred. There is no alternative integrated pre-school provision for around 19 miles.

161. Enrolment numbers at Mill Strand IPS have been increasing in recent years and this trend is expected to continue, with the school having moved to an approved double class intake in September 2018. Should this DP be approved, the additional NU could be incorporated into the new build project currently being planned for the school, subject to the necessary approvals and finance being made available.

CONCLUSION

162. On balance it is considered that 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. Furthermore, it is considered that this test has been met to a standard which offers confidence that sustainable pre-school provision could be established that satisfies demonstrated parental demand, and allows for further growth in accordance with the Department's Article 64 statutory duty. It is also considered to be an educationally sound proposal in terms of transition of children into the recently established double entry to the host primary school, while recognising the point that objectors make that transition to a host primary school does not necessarily equate to a better transition experience than may be possible from pre-school provision at a neighbouring provider.

163. There are no evidential areas of concern in relation to obligations under the Rural Needs Act and concerns expressed by objectors in relation to Shared Education arrangements are not supported by clear evidence of detrimental impact.

164. There is however a risk of good quality established provision being displaced, and although NICIE contends that this would represent replacement rather than displacement, as the playgroup has accommodated 23 children in both 2017/18 and 2018/19, this could materially impact on the sustainability of established providers. That risk is one that may need to be embraced if the Department is to uphold its Article 64 duty.

165. While objectors understandably point to the costs associated with implementing this proposal at a time when the education budget is under pressure, this proposal highlights the fact that existing parts of the configuration of pre-school provision in this area are proving not to be cost effective in terms of admitting target age children, and that problem may be exacerbated through the outworking of parental preference in this area for pre-school provision at an integrated setting. The evidence suggests that the planning authorities may need to turn

their attention to that issue, and in doing so this would act as a cost control in support of the Department's Article 44 duty.

166. DE guidance, informed by legal advice and case law, has confirmed that the Article 64 duty applies equally to pre-school education and that pre-school provision at an integrated setting is distinct from other forms of pre-school provision. The extent of overprovision in this area is a concern, as are the attendant cost implications, but with the only alternative pre-school provision at an integrated setting located around 19 miles away in Ballycastle, the evidence appears sufficiently compelling in favour of responding positively to evidenced parental demand for more pre-school provision at an integrated setting in support of the Article 64 duty.

167. The proposed implementation date for DP 542 has lapsed, thereby requiring a modification, if approved. It is proposed that the implementation date be modified to 1 September 2019, or as soon as possible thereafter. The admissions process for September 2019 is now underway but a proposed new date of 1 September 2019 should be achievable. To implement the proposal at any other date risks in-year disruption to other pre-school settings and more importantly to pupils whose pre-school education only lasts for one year.

168. Colleagues in the Department's Irish-medium and Integrated Education (IMIE) Team have advised that they are content that DE's duty under Article 64 of the Education Reform (Northern Ireland) 1989 Order to encourage and facilitate the development of integrated education has been considered in this submission and that it also takes account of Departmental advice issued to the EA on 31 October 2017 and 15 January 2018 which clarified and outlined the implications of the statutory duty to integrated education in relation to pre-school provision at integrated primary schools. The advice further highlighted 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 CI primary schools; and taking positive steps or removing obstacles which inhibit the statutory duty. The IMIE Team indicated that these aspects of the guidance have also been reflected in this submission and the Team concurs with the recommendation to approve DP 542 in light of the evidence and information presented.

RECOMMENDATION

169. On the basis of the evidence set out above and taking into consideration relevant statutory duties, it is recommended that you:


- (i) Approve DP 542 with a modification to the implementation date (as the proposed date has now lapsed):

To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September 2019, or as soon as possible thereafter.

- (ii) Agree that this submission (with appropriate redactions) can be made available on the Department's website once the school and the Education Authority have been notified.



EAMONN BRODERICK

 69002

eamonn.broderick@education-ni.gov.uk

cc:

Lianne Patterson
Fiona Hepper
John Smith
Noelle Buick
Janis Scallon
Cathy Galway
Philip Irwin
Alison Chambers
Bill Stevenson
Adrian Murphy
Christine Leacock
Press Office
APPT Correspondence

EDUCATION AUTHORITY
DEVELOPMENT PROPOSAL NO 542
MILL STRAND INTEGRATED PRIMARY SCHOOL

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

It is proposed to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September 2018 or as soon as possible thereafter.

A copy of the Proposal and Case for Change may be inspected at offices of the Education Authority, Ballee Centre, Ballee Road West, Ballymena, BT42 2HS between the hours of 9.00 am and 4.30 pm and 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 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

**MILL STRAND INTEGRATED PRIMARY SCHOOL &
NURSERY UNIT**



Nursery Development Proposal

“Promoting Excellence, Celebrating Difference”

November 2017

CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

AREA PLANNING DISTRICT	Causeway Coast and Glens Council Area
DP NUMBER	DP 542
PROPOSER	Board of Governors of Mill Strand Integrated PS & NU Contact: Philip Reid, Principal Tel: 028 7082 3090
SCHOOL(S) NAME	Mill Strand Integrated Primary School & Nursery Unit
SCHOOL REFERENCE	306-6544
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	Week commencing 14 May 2018
PROPOSAL	It is proposed to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School with effect from 1 September 2018 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>PROPOSER</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:</p> <ul style="list-style-type: none"> • 30th January 2014 • 20th March 2014 • 30th April 2014 • 28th May 2014 • 6th November 2014 • 22nd January 2015 • 28th March 2015 • 4th June 2015 • 24th September 2015 • 19th November 2015 • 21st January 2016 • 3rd March 2016 • 28th April 2016 • 7th June 2016 <p>Following the initial outcome of DP484 the Board of Governors further discussed the way forward.</p> <p>Following consultation on the dates below:</p> <ul style="list-style-type: none"> • 28th September 2017 • 19th October 2017 <p>It was unanimously agreed that the submission of this Development Proposal was vital to meet the needs of the school and wider community.</p> <p>Meetings of <u>Parents' Council/Committee</u> to outline the proposals for increasing the school size from Sept 2016 as well as address the critical issues and need to relocate the school:</p> <ul style="list-style-type: none"> • 28th May 2015 • 17th June 2015 • 9th September 2015 • 18th September 2015 • 24th September 2015 • 16th October 2015 • 2nd November 2015 • 26th November 2015 • 20th January 2016 • 4th March 2016 • 4th May 2016 <p>The documented shortfall of places within a 2-mile radius of the school, the significant under provision in demand for integrated pre-school places and the exclusion of the 64 children catered for at Mill Strand's non-statutory pre-school over the past three years in EA data/submission was discussed in detail at Parent Council meetings on:</p> <ul style="list-style-type: none"> • 7th September 2017 • 16th October 2017
--	---

	<p>A further survey of parents, pupils and the wider school community was undertaken from 6th–17th November 2017.</p> <p>The views of the Governors, Staff and parents are detailed within the document and were unanimously in favour taking forward a Development Proposal for an additional 26 part-time nursery places at their grant maintained integrated primary school.</p>
<p>CONFIRMATION BY THE PROPOSER</p>	<p>I confirm that the school(s) Board of Governors, Staff and Parents of Pupils were consulted on and Equality Screening of the proposal has been carried out.</p> <p>Name: Elsa McLennan - Chair of Board of Governors</p> <p>SIGNED: </p> <p>DATE: 30.11.17</p>

ASSOCIATED PROPOSALS

<p>DP</p> <p>Published DD/MM/YY</p>	<p>None</p>
--	--------------------

**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 January 2018.</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 10 May 2018</p>
<p>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.</p> <p>Summary of views received (number of responses, recurring themes, petitions, community support or opposition).</p>	<p>The Authority, before submitting a proposal to the Department, is obliged to consult with the Trustees and managers of any school or schools which would, in the opinion of the Authority, be affected by the proposal. Comments were invited from 77 schools which might be affected by the proposal on 11 January 2018 (all within the Causeway Coast & Glens Council area) to be returned to the Education Authority by 8 February 2018.</p> <p>One of the providers was not included in the initial consultation; therefore, their comments on the proposal were invited to be returned by 23 April 2018.</p>
<p>Responses/Assurances in respect of issues raised during consultation.</p>	<p>Seven responses were received all of which expressed concerns about the proposal and in many cases the concerns were similar. The following provides a summary of issues raised:</p> <ul style="list-style-type: none"> • That pre-school provision is not defined according to


<p>Dates of EA meetings e.g. Education Committee/ Board etc</p> <p>Details of issues raised by members of EA Board</p>	<p>sectors, so all pre-school settings, regardless of location, are considered accessible to children from all backgrounds.</p> <ul style="list-style-type: none"> • That there is no due consideration to the potential impact of the sustainability of other neighbouring schools. • That there is sufficient capacity within the area to cope with any additional demand and this should be filled prior to additional capacity being created. • That the impact of increasing statutory nursery provision would be a further bias and would be prejudicial to existing voluntary playgroups in the area. • That the Department of Education has consistently been unable to provide the necessary resources to establish nursery provision with other primary schools in the area. • That there are concerns over the safe operation of the site with access issues to the school and drop off/pick up arrangements highlighted. • That pupils from other schools also attend services in churches.
--	---

- That there has been a long history of cross community pre-school provision in the area and an inclusive ethos within local schools, including well established Shared Education links between schools.
- That area planning cannot be adequately considered whenever the new site for Mill Strand IPS is still to be identified. The impact from an area learning perspective cannot be reasonably considered in this situation.
- That the level of pre-school/ nursery provision across the 5 mile radius indicates that there is over provision in the area and that the population projections would indicate that fewer pre-school places are likely to be required in the future.
- That the parental demand for integrated pre-school provision, includes demand from outside the two mile radius noted in the Case for Change therefore the demand for pre-school provision within a two mile radius does not justify an additional 26 places.

A further response to the proposal was received from the Controlled Schools' Support Council. It stated it recognised the potential for this proposal to impact on the sustainability of controlled schools in the area and welcomed the opportunity to make the following comments:

- There are a number of statutory and voluntary providers in the area which will be impacted by the proposal.
- That pre-school provision is not defined according to sectors, so all pre-school settings, regardless of location, are considered accessible to children from all backgrounds
- The proposal has potential to affect the ability of neighbouring controlled schools to remain sustainable and therefore may disadvantage children and young people in the schools in the overall area.
- The demand for pre-school provision within a two mile radius does not justify an additional 26 places.
- That there has been a long history of cross community pre-school provision in the area and an inclusive ethos within local schools, including well established Shared Education links between schools.
- Excellent transition programmes exist within all pre-school settings and primary schools in the area to ensure all children experience a smooth transition from pre-school to primary school regardless of the setting from which they are transferring or the primary school within which they will be enrolled.

This development proposal was discussed by the EA's Education Committee at its meeting on 10 May 2018.

<p>EDUCATION AUTHORITY COMMENTS</p> <p>In the context of planning on an area basis - what is the EA's view of the proposal, taking into account any pre-publication consultation. Does the EA support the proposal?</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 10 May 2018</p>	<p>EA notes the guidance provided by DE and notes the recommendations of PEG; and 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 an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2018 or as soon as possible thereafter**

PEG Comments

School	MILLSTRAND INTEGRATED PRIMARY SCHOOL AND NURSERY UNIT															
Address	33 Dhu Varren, Portrush BT56 8EW															
Does PEG support the proposal?	<p>PEG considered the DP from Mill Strand 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: "It is important the Education Authority and the PEG support the Department in fulfilling its statutory duty by striving to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish-medium pre-school education"</p> <p>In this context, PEG supports the DP on the basis of demonstrated parental demand as evidenced by:</p> <ul style="list-style-type: none"> • the number of 1st preference applications (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. <p>However, PEG would have strong concerns in regard to the potential impact of this additional provision as follows:-</p> <ul style="list-style-type: none"> • 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. 															
What is the potential impact if the proposal is/ is not approved? (alternatives for meeting demand/ potential for over provision)	See attached statistics. Currently within the wards a total of 152 funded pre-school places are available and in January 2018, 173 1 st preference applications have been received. Existing non-statutory providers currently have spare capacity within their settings and are not operating to maximum registration.															
What is the PEG assessment of need for pre-school provision for the area? Is this need currently met?	Demonstrated parental demand for Integrated pre-school provision. Mill Strand IPS currently has a nursery unit with 26 full-time places but has received 50 1 st preference applications.															
How many 1 st preference applications were received by the setting? (usually 2 years figures but this depends on the timing of the development proposal)	<p>2018 – 26 places – 50 1st Preference applications 2017 – 26 places 50 1st Preference applications 2016 – 26 places 34 1st Preference applications Mill Strand IPS overview:-</p> <table border="1" data-bbox="603 1742 1034 1989"> <thead> <tr> <th></th> <th>Year 1</th> <th>Total Enrolment</th> </tr> </thead> <tbody> <tr> <td>2017-18</td> <td>47*</td> <td></td> </tr> <tr> <td>2016-17</td> <td>53</td> <td>245</td> </tr> <tr> <td>2015-16</td> <td>28</td> <td>216</td> </tr> <tr> <td>2014-15</td> <td>32</td> <td>210</td> </tr> </tbody> </table> <p>*P1 number from Admissions office – census 2017-18 not available.</p>		Year 1	Total Enrolment	2017-18	47*		2016-17	53	245	2015-16	28	216	2014-15	32	210
	Year 1	Total Enrolment														
2017-18	47*															
2016-17	53	245														
2015-16	28	216														
2014-15	32	210														

Are there current or anticipated pressures in placing pre-school children in the area?	Projected live births for the Atlantic, Dunluce, Portstewart, Royal Portrush area: 2017 admissions 73 (145 1 st preference applications) 2018 admissions 86 (173 1 st preference applications) 2019 admissions 59
Have children been unplaced at the end of the process in previous years?	In both 2016/17 and 2015/16 there was one child unplaced in Portrush at the end of Stage 1. No further preferences given in Stage 2 so they remained unplaced.
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	Increased demand for 2018.
Can existing voluntary/private providers expand to help meet demand? Is there potential for new providers to come on to the programme?	Existing providers can take additional funded places, if required, within their current registration.
What is the potential impact on existing good quality provision (displacement)?	Existing non-statutory providers currently have spare capacity within their settings and are not operating to maximum registration. Displacement may occur for these settings if an additional nursery unit is approved.
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?)	No other Development Proposals.
Other comments	

1. BACKGROUND

Brief Description of School

Mill Strand Integrated School was established by a group of parents from Portrush and surrounding areas and opened in 1987. Since the school opened in 1987 with 52 pupils, it has grown and developed into a popular, local school. Following approval of DP483 the school's Enrolment Number for 2018 is **260** and the Admissions Number is 58 for P1 (Source: EA website).

As it celebrates its 30th Anniversary, Mill Strand IPS has a current enrolment of **248 (297** including the **26** Nursery & **23** additional pre-school). The school continues to be a popular, over-subscribed school despite having to operate in inadequate, sub-standard accommodation.

The school accommodation consists of 12 classrooms, a small Learning Support room, assembly/dining/PE hall, secretary's office and principal's office. Six of the classrooms are in the permanent building, one of which, the Nursery, is accommodated in the original house in which the school was founded. The Secretary's office, Principal's Office, Learning support room and staffroom are also located in this two-storey building. Six of the classrooms are located in mobile units.

The current teaching staff consists of principal, 9 full-time teachers and 2 part-time/job-share teachers. The classroom assistants, secretary, building supervisor, cleaners, supervisory assistants, meals' staff and staff in the additional pre-school centre complete the full staff team.

As well as delivering the full curriculum a wide range of extra-curricular activities are also undertaken within the school including: golf, surfing, cycling proficiency, football, glee, dance, netball, hockey, art club, cookery club and drama club. In addition, the school was one of the first outside Belfast to run an After School Club offering wraparound care until 6pm daily and during periods of school closure.

Mill Strand Integrated Primary School is delighted to have a hard working Parents' Council that contributes greatly to the social and financial support of the school.

The existing Nursery Unit was initially established as a Pre School, becoming a GMI Nursery in 2001, offering 26 part-time places. Due to social deprivation these were increased to full time places in November 2009. The Pre-School Playgroup at the school was established for September 2015 to meet parental demand for places at an integrated setting and is now registered for 23 children.

Location including any relocation details

Mill Strand Integrated Primary School is located at 33 Dhu Varren, Portrush, Co. Antrim and has a current enrolment of **248**.

The first tranche of potential capital projects under the Stormont House and Fresh Start Agreements was announced on 23 March 2016 and Mill Strand Integrated School & Nursery was included in this announcement.

Consequently, since 23 November 2016, the school has been working in collaboration with the Department of Education and, in recent months, with McAdam Design to develop a new school that will help Mill Strand meet the demand for integrated education in the Portrush area. It is anticipated that the work will be completed in time for the start of the 2021/22 academic year. The Department of Education and McAdam Design are currently working with the Project Board to identify the most suitable site for relocation within a 1.5 mile radius of the existing school.

The plans for the new 14 class base school are such that there would be sufficient room to allow for the potential of a double nursery unit, to meet established and documented demand. This would also be the best possible opportunity to address the documented 'under provision' of pre-school places in the Portrush area as it can be included in the Fresh Start investment in Integrated and Shared Education.

It should be noted that whilst the 1989 Education Reform Order enabled the grant aiding of integrated schools, integrated nurseries were excluded from this and this aspect was only repealed in 1998. Thus many integrated schools were established in those early years and were not permitted to have funded nursery units.

In the past, controlled and maintained schools which were being built or rebuilt would have been considered for a nursery unit. In 2006 the Department of Education published:

Outcomes from the review of pre-school education in Northern Ireland and reframed the policy thus:

'Decision: The wider issue about children having access to high-quality provision in a suitable environment in all early years settings will be considered further, taking account of:

- The more integrated arrangements in support of early years that have recently been announced; and
- the strategic development and use of the schools' estate.

Meanwhile, the current arrangements, based on a policy of non-sectoral provision, will remain. It is therefore unlikely that there will be new building in the statutory sector other than:

- Units at replacement primary schools (i.e. existing units whose parent schools are being rebuilt) where they are necessary to meet demand in their areas;
- Replacement nursery schools that have reached the end of their useful life but which are still required to maintain pre-school provision levels in their area;
- New schools/units where amalgamations and rationalisations of primary schools offer the potential for (needed) centralised nursery provision; and
- New schools/units in areas where demographic change has resulted in a need to provide more pre-school places and where it is decided that statutory rather than voluntary/private provision is required.'

2. SUSTAINABILITY ASSESSMENT

Stable Enrolment Trends

Current School Enrolments – approved, historical and current actual enrolments, available places

Table 1: Enrolment at Mill Strand Integrated Primary School & Nursery 2011-2017

Year	Admissions
2017/18	297*
2016/17	268*
2015/16	232*
2014/15	210
2013/14	207
2012/13	207
2011/12	189

Source: NEELB Open Enrolment 2015/16

**inc additional pre-school to meet parental demand.*

Above figures include Nursery & [Pre School (2015-16), (2016-17) & (2017/18)]

Please note that 2015-16 figures comprise of 186 School, 28 Nursery and 18 Pre School and increased to 242 by the end of June 2016.

*The 2016-17 figures comprise of 221 School, 27 Nursery and 20 Pre School
The 2017-18 figures comprise of 248 School, 26 Nursery and 23 Pre School*

Current Approved Enrolments/Admission Numbers

Table 2 Nursery Admissions – first preference applications, total applications accepted at end of admissions process, approved admission, actual admission

School	Year	1 st preference	Total applied	Total admitted	Total Level of Over-subscription for 1 st choice applications
Mill Strand IPS Nursery Unit	2017/18	49	56	26	23
	2016/17	38	38	26	12
	2015/16	43	43	29	17
	2014/15	23	23	26	0
	2013/14	44	44	28	16
	2012/13	31	31	26	5

Source: NEELB & DE

** The short term funding of a pre-school has clearly illustrated the need for additional pre-school places in integrated settings.*

NB In 2016/17 all 12 families not admitted through Open Enrolment chose to attend the school's Pre School setting. In 2017/18 the school has been able to accommodate 23 children in the non-statutory pre-school and has four children on a waiting list.

High Quality Educational Provision

The District Inspector made a district inspection visit to the school on 6 April 2016 and this included a visit to the nursery unit. The Inspectorate noted that there had been a change in personnel and the principal was positive and pleased with the new appointment. The teacher, along with the assistants worked very well as a team and were engaged in plenty of one-to-one support for the children as well as using ICT very effectively to photograph and record the children's competence in completing important tasks and activities that are required in the pre-school curriculum. Interactions were purposeful. Learning and soft-skills were also focused.

The staff coped well in working with a fairly large number of highly inquisitive and engaged children at the time of the visit and signs were clear, on the day of the visit, that they had made significant progress since the time of their last inspection building on the existing 'good' practice towards developing a high capacity of sustained improvement.

Sound Financial Position

The school is currently operating with an acceptable budget surplus. Its three-year financial plan has been carefully budgeted by the Principal to allow for continued growth and to maintain the high standards currently in the school.

Strong Leadership & Management

In 2012 the ETI acknowledged the work of the Principal stating:

"The Principal... provides very good leadership and management. He knows well the children, their families and the community they come from. He maintains a clear overview of development work to bring about whole-school improvement, and is supporting and building the capacity of the teachers as effective co-ordinators. He values well the commitment and skills of all the staff and is very knowledgeable, supportive and appreciative of their contributions."

Leadership & Management has further strengthened in recent years with significant development at both Governor and Middle Leadership level.

The Board of Governors has seen a reconstitution within the last year, enabling the school to strengthen its board with the addition of highly skilled members, bringing a wide range of professional and personal qualities to the school. With the anticipated appointment of three highly respected and prominent governors to the remaining Trust Foundation and DENI positions the school is due to have a full complement of 16 governors by the end of 2017. The Board work closely with the Principal to realise the vision of the school and improvement measures suitably identified in the school's Development Plan to bring about high quality, sustained improvement in the interest of all stakeholders. In doing so the Board suitably utilises its challenge function and is very supportive.

The Board of Governors has worked tirelessly since the submission of the school's previous Development Proposal to maintain the high standards of the school and support those parents seeking an integrated education for their children. Its reformed Project Board has engaged fully with DENI officers to inform and progress the school's new build, bringing a high degree of professionalism, enthusiasm and support to the work of the board.

Mill Strand Integrated School & Nursery has also invested heavily in staff development and in particular Leadership Development. For the past three years the school has been at the forefront of developing distributive leadership, facilitating the development of all teachers as 'Leading Learners' through InSET and leadership opportunities within the school. The school is currently in its second year of a three-year programme to develop all teachers as leaders creating agility within leadership & management structures and clarity & understanding at all levels within the school towards realising its 2020 Vision.

The ETI has recognised the school's Development Plan as an example of outstanding practice. This plan has been further refined and improved for 2017/18 with the development of leadership at its core and carefully prioritised action planning highlighted to facilitate sustainable high quality improvement in the interest of all learner

Accessibility

- Access

Mill Strand Integrated PS's is currently located within the Portrush area, within convenient transport distance for all its present pupils. It is also readily accessible to future pupils travelling from areas outside the current immediate catchment area and is situated on the main bus route connecting the three towns it mainly serves.

The current site has health & safety issues relating to access from the main road. This has been exacerbated by the removal of parking, drop off and collection rights by the neighbouring landowner at the start of the 2015 academic year. Remedial Minor Works have been undertaken by DENI to address this issue pending the relocation of the school to a larger site in the town. The school has also put in place staggered drop-off and collection times to alleviate traffic flow from the main road. As the Nursery collection time is before that of the main school it can easily accommodate drop-off and collection.

The new school will be located, designed and built to 'handbook' standards and to comply fully with access requirements.

- Accommodation/Site

The school currently operates a Nursery and Playgroup within its existing accommodation. No additional accommodation would be required to accommodate a double intake nursery on the existing site. An additional Nursery classroom would, however, be required at the new site/build. As the school is currently at the design and pre planning stage it would be very easy for the Integrated Consultant Team & Project Board to include this in the new build Nursery under Fresh Start Agreement Funding.

- Capital Proposals/Minor Works applications with the Department.

The school and its Project Board is currently working with the Department of Education under Fresh Start Agreement funding to develop and build a new 14 class base school and nursery unit on an alternative site in the Portrush area. Mill Strand Integrated School & Nursery has submitted a Minor Works application for four additional temporary classrooms pending the completion of the new build. DENI is currently working with the school to provide a double modular unit of two classrooms on site for September 2018 with a further unit planned for September 2019. These classrooms, together with existing

accommodation will provide adequate accommodation for the growing school population until the new build is completed in February 2021 for the start of the 2021/2022 academic year.

Strong Links with the Community

As evidenced by ETI 2012 Mill Strand Integrated PS has exceptionally strong links with the local community and is widely recognised as ‘*a school in the heart of the community, catering for the whole community*’. Mill Strand IPS is the only school in the wider ‘Triangle’ area that hosts services in all three of the main churches: Harvest at Ballywillan Presbyterian, Sacraments, including First Holy Communion, at either Star of the Sea Portstewart or St Patrick’s, Portrush and a Christmas Carol Service at Holy Trinity Church of Ireland, Portrush. The school regularly utilises local businesses and venues to host school events, functions and plays. The school’s strong and vibrant Parents’ Council further illustrates these strong links evidenced through the numerous well-supported and innovative community events held every year.

3. AREA PLANNING IMPACT

Mill Strand IPS is the only integrated primary school and pre-school provision in the Coleraine, Portrush, Portstewart ‘Triangle’ area. This proposal would address parental demand for Integrated Pre-School Education. Consultation with Mill Strand IPS Parents’ Council has highlighted the concerns of parents regarding the level of oversubscription at Mill Strand IPS Nursery Unit and Primary School. Admissions are restricted to 26 in the Nursery, this has been particularly oversubscribed for the past few years. To address oversubscription in the school, a development proposal was submitted and approved earlier this year. The P1 approved admissions number is now 58. With regard to pre-school provision, in order to address the oversubscription, the school opened an independently funded pre-school playgroup with funding from the Integrated Education Fund (IEF) in September 2015. Table 3 below shows the admissions and enrolment at the playgroup over the last 3 years

Table 3 – Admissions and Enrolments at Mill Strand IPS Independent Playgroup

	Year School	No of 1st pref App	Total No of Applications	Total No Admitted
Mill Strand IPS Playgroup	2017/18	23	27	23 (all correct age)
Mill Strand IPS Playgroup	2016/17	15	21	# (inc * u/a)
Mill Strand IPS Playgroup	2015/16	17	17	17

Impact on other settings

This Development Proposal has been notified in the Area Action plan. Table 4 (below) shows the P1 children in Mill Strand IPS have attended a number of other pre-school settings.

A substantial majority of the pre-school cohort of children attending Mill Strand IPS Nursery Unit and Pre-School Playgroup enrol in P1 at Mill Strand IPS as demonstrated below. A small number of the P1 children come from a variety of other settings with a few children coming to P1 with no pre-school experience. This is particularly pronounced in the 2016/17 year, when 9 children had no pre-school experience.

Table 4: Pre-school Experience of P1 intake at Mill Strand IPS

Year	Name of Setting	No of Children	Total No Admitted
2017/2018	Mill Strand IPS Nursery Unit	27	52
	Mill Strand IPS Playgroup (unfunded)	17	
	Causeway Pre-School	*	
	Portrush Pre-School	0	
	Portstewart Nursery Unit	*	
	St Colum's Pre-School Centre	0	
	Stepping Stones Creche, Portstewart	0	
	Nursery outside area e.g . Isle of Man/Enniskillen	*	
	No pre-school	*	

2016 / 2017	Mill Strand IPS Nursery Unit	27	53
	Mill Strand IPS Playgroup (unfunded)	17	
	Causeway Pre-School		
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		
	No pre-school	9	
2015 / 2016	Mill Strand IPS Nursery Unit	26	28
	Causeway Pre-School	*	
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		
	No pre-school	*	
2014 / 2015	Mill Strand IPS Nursery Unit	27	32
	Causeway Pre-School	*	
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		
	No pre-school	*	

Table 5 Alternative Pre-school/Nursery Provision within a 2 miles radius

School Name STATUTORY	Year	No of places available	No of 1st pref App	Total No of Applications	Total No Admitted
Mill Strand IPS Statutory Nursery Unit	2017/18	26	58	61	26
VOLUNTARY PROVIDERS					
Portrush Community Playgroup (Situating at Portrush PS)	2017/18	32	16	22	22
Causeway Pre-School (Situating at St Patrick's PS)	2017/18	15	11	12	12
TOTAL		73	85	95	60

Table 6 Alternative Pre-school/Nursery Provision within a 3 miles radius

School Name STATUTORY	Year School	No of places available	No of 1st pref App	Total No of Applications	Total No Admitted
Portstewart PS Statutory Nursery Unit (Situating at Portstewart PS)	2017/18	26	33	35	26
VOLUNTARY PROVIDERS					
St Colum's Pre School (Situating at St Colum's PS)	2017/18	21	10	13	13
TOTAL		47	43	48	39

Source: EA

Table 5 above, highlights that Mill Strand IPS is significantly oversubscribed and there is a very high level of demonstrated parental demand for integrated pre-school provision. Portstewart PS Nursery Unit is also heavily oversubscribed. The seventeen children that Mill Strand IPS took into their independently funded pre-school playgroup may have masked what is already evident in Table 5 and Table 6, that there is a shortfall in pre-school provision in the area. A fact that was commented on in the DE submission to the Minister on the previous proposal put forward by Mill Strand IPS for a second nursery unit.

“Preschool provision significantly lower than the planning figure as highlighted by the Early Years Team in July 2017:

“The level of provision within the two mile radius is currently significantly lower than the planning figure, even if the proposed statutory provision were made available. This would suggest that pre-school education in the area is insufficient to meet demand, however, the EA has advised that in each of the last two years, every target aged child in the area whose parents stayed with the pre-school admissions process to the end received the offer of a funded place, suggesting that demand in the area is currently being met with the current level of provision.”

[Early Years Team Summary Page 179 Response to DP 284 9 July 2017]

The EA’s statement quoted in the submission to the Minister on DP No 484 (Pt 147) was:

“in each of the last two years, every target aged child in the area whose parents stayed with the pre-school admissions process to the end received the offer of a funded place, suggesting that demand in the area is currently being met with the current level of provision.”

The school would argue that this is evidence of the ‘masking’ of actual demand and provision because it doesn’t include the 37 pupils supported by Mill Strand IPS through non-statutory pre-school support over that period and a further 23 children in 2017/18. It would be important to note that 9 children in the 2016/17 year did not arrive in P1 with any pre-school experience.

The above figures further reinforce the evidence supplied by Mill Strand Integrated School and the clear statement made by the Early Years’ Team that:

“The level of provision within the two mile radius is currently significantly lower than the planning figure, even if the proposed statutory provision were made available. This would suggest that pre-school education in the area is insufficient to meet demand.”

[Early Years Team Summary Page 179 Response to DP 284 9 July 2017]

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

The significant level of oversubscription at Mill Strand IPS constitutes ‘demonstrated parental demand’ for additional integrated pre-school provision.

Religious Balance of Pre-school settings in Portrush and surrounding areas

Table 7 (below) demonstrates that the statutory provision in Mill Strand IPS is providing a religiously integrated provision with a good representation from all communities attending. The table below shows that whilst there is definite mixing in the Mill Strand Integrated Nursery Unit, of the other settings, only Portrush Pre-school playgroup has Catholic and Protestant children in the same classroom.

Table 7: Religious Balance in these settings; including nursery units, year 2016/17

Funded Providers	No. of Protestants	% Protestants	No. of Catholics	% Catholics	No. of Others	% Others	Total
Mill Strand IPS Nursery Unit	10	37.0	7	25.9	10	37.0	27
Causeway Pre-School	*	*	#	#	0	0.0	15
Portrush Pre-School	17	58.6	6	20.7	6	20.7	29
Portstewart Nursery Unit	12	46.5	0	0	14	53.8	26
Stepping Stones Creche	#	#	*	*	0	0.0	10

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

Source DE

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

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:

- Twenty-nine out of the 95 nursery schools have between 20% and 79.9% Catholic, this is a total of 30.5%.
- 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 difficult then to state that pre-school is in reality non-sectoral.

Impact on other integrated provision

Other integrated settings (Carhill CIPS, Ballycastle CIPS, Ballymoney CIPS) of these three schools, only one has a nursery unit, Ballycastle CIPS (19.8 miles away) which is oversubscribed and too far away to be impacted. All the schools serve catchment areas that are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, are realistic options for parents seeking integrated provision.

4. RATIONALE FOR PROPOSAL

The desire for this proposal is led in part by the parents of children attending Mill Strand IPS as they want local, accessible integrated pre-school education for their children. The level of over-subscription in the nursery unit as shown in Table 2, demonstrates parental demand that the Governors believe must be addressed.

In addition, this would support the realization of the objectives of Area Based Planning which include 'The aim of the plan is to facilitate the development of a network of viable and sustainable primary schools which can effectively deliver the Northern Ireland

Curriculum. This would address the mismatch in admissions between the two-form entry in the primary and the single unit entry in the nursery thereby supporting the school to deliver improved outcomes for children, a smoother transition and to become a more sustainable school. This would also support the DE by assisting in its duty 'to encourage and facilitate the growth of integrated education.

Specific reasons include:

- More efficient and effective way of funding and administering early years provision.
- To create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion.
- To rationalize governance and inspections under a single model, that is the LMS management system.
- The Northern Health and Social Care Trust, the registering authority for the playgroup, require the school to adhere to a number of procedures as part of their requirements. In a letter to the school dated 19th August 2016, the Early Years Panel have asked "that reasonable steps would be taken to avoid congested areas within the school such as 9.00am, 10.45am and 12.40 and outdoor play would be timetabled to ensure children do not mix with others within the setting and the Early Years Panel viewpoint on this remains unchanged." In practice this means that the school cannot allow the children in the playgroup to mix with the children in the statutory nursery unit at Mill Strand IPS except for the school nativity as long as appropriate risk assessment is in place according to the Health Trust requirements of registration. This is only allowed as it would be time limited. Therefore approval for an additional 26 statutory nursery places at Mill Strand IPS would allow the school to operate under one management system, LMS.
- Parents of children attending Mill Strand IPS want their children to be able to avail of pre-school education in an integrated school. The governors took the decision to open a Playgroup in Sept 2015, funded by IEF in an effort to support parental demand for integrated pre-school. The Playgroup currently has 23 children enrolled from September 2017.
- The staff and governors are keen to see parental demand for integrated pre-school provision at Mill Strand IPS met, provision that is heavily oversubscribed on an annual basis.

- The staff and the Governors recognize 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’.
- Approval for additional pre-school provision in Mill Strand IPS would support parents in being able to access the highly sought pre-school provision in this integrated school environment from the age of 3 to 11 years in the Triangle area.
- Those involved in Mill Strand Integrated PS would like to play a role in moving towards a shared future for all. The school has been at the forefront of building a shared future and continues to strive to break down barriers in a community still divided on grounds of religious difference.

Need for Additional Pre-School Provision

In the departmental submission to the Minister on DP No 484, a series of ‘Other Considerations’ were addressed (page 29) “In determining need, the Department generally assumes a level of provision at 95% of target age children, predicated on the application rate for pre-school places that is approximately 92%. As the existing non-statutory provision at Mill Strand IPS is not PSEP funded provision, it is not included in the analysis below, either before or after the proposed change.

The numbers of pre-school places and associated percentages, measured against the Year One enrolments for 2014/15, 2015/16 and 2016/17 academic years.

Table 8 Level of Pre-school Provision – Two mile radius of Mill Strand IPS

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision (exc. reception)	P1 places	Level of pre-school provision (% of P1 places)	Underage children in statutory places
2014/15	26	47	0	73	93	78.5	0
2015/16	29	38	0	67	109	61.5	0
2016/17	27	44	0	71	110	64.5	0
2017/18 (as proposed)	52	44	0	96	110	87.3	-

Source: Extract of submission to Minister on DP No 484

<https://www.education-ni.gov.uk/sites/default/files/publications/education/DP%20484%20Millstrand%20IPS%20%28Nursery%20Unit%29.PDF>

The level of provision within the two mile radius is currently significantly lower than the planning figure, but would be close to 100% if the proposed statutory provision is approved.”

It's important to note that the EA has asserted that every child who had stayed within the process got a place. However this doesn't take account of those who were unable to stay within the process and those who have taken places in the unfunded setting at Mill Strand IPS.

In September 2018, Mill Strand IPS anticipates an enrolment of 274 as it currently has 49 children enrolled in the school's statutory nursery unit and independent playgroup whose parents have all indicated to the school that they are committed to Integrated Education and wish to enrol in P1 for September 2018. The school also has a waiting list of pupils that it cannot accommodate in its pre-school settings having had a request for temporary flexibility turned down. This temporary flexibility request was for children with siblings at the school for which any alternative provision presented insurmountable travel difficulties. As the request was unapproved all four families are not in receipt of funded pre-school places and are included in the numerous parents who did/could not 'remain within the pre-schools admissions process'. These children are also excluded from EA figures.

There is no alternative for parents seeking an integrated education. All other providers within a three-mile radius are sited beside or in the schools for which they are feeder pre-schools. All of these schools are either controlled or maintained settings. Mill Strand Integrated School would fully support this arrangement, however, as it enables all of the schools concerned to work closely with their pre-schools, facilitate seamless transition to primary education, enable the highest levels of collaboration and communication throughout the foundation stage (Nursery – Year 2) and aid the early identification and intervention of SEN. Mill Strand IPS would argue, however, that important relationships and friendships are developed in this pre-school year along with a familiarisation of the ethos of the school. It is unacceptable therefore that these bonds and friendships should be broken at the age of four on the basis of religion.

The school appreciates the view of the ETI that children will benefit from having access to a pre-school education within the integrated education sector, should that be the wishes of their parents and that the ETI is supportive of DE's wider policies, which include arrangements for integrated education.

Table 9 Millstrand IPS – Religious Balance (figures for whole school)

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	
Protestant	76	69	69	71	74	98	33%
Roman Catholic	80	86	81	74	71	80	27%
Other /No Religion	51	52	60	71	100	118	40%
Total	207	207	210	216	245	296	

NB 2017/18 figures include Non-statutory Pre-school

5. EDUCATIONAL IMPACT

The school currently provides a strong capacity for sustained improvement in the interest of all learners as evidenced by recent ETI inspections. Approval for the establishment of additional nursery provision at Mill Strand Integrated PS would be significant in providing parents with much sought after integrated pre-school provision at the school to meet parental demand. This would increase accessibility to integrated education and strengthen the position of the school within the Portrush area.

By extending the capacity of the Nursery to 52 places, the school will be able to extend the availability of high quality pre-school provision and build on the outstanding progress of pupils in the foundation stage.

An essential part of integrated education is the celebration of difference, of allowing children to maintain and develop social and friendship bonds that cross divides of cultural, religious, national or social boundaries.

To maximise the educational outcomes for the school's young people, it is essential that these relationships and ethos be maintained from the earliest opportunity in an integrated setting rather than be broken by failing to meet parental choice of both integrated Nursery and Integrated School provision. This would allow for acceptance and celebration of difference to be firmly built into the children's DNA so that they may make a lasting positive impact on our society.

- **Educational Benefits including High Quality Educational Provision**

The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). Mill Strand IPS has been able to see some practical evidence to support this. The most obvious benefit of 26 additional places for pupils would be the continuity and progression of educational provision that can only be facilitated through a Foundation Stage education on a single site. The shared collaborative planning and professional communication between all Foundation Stage staff as well as the use of 'To Build a Profile' in Mill Strand IPS Nursery enables the school to track children in order to provide personalised targets and learning opportunities to ensure they are meeting their own individual milestones and next steps at an appropriate pace. This carries forward seamlessly into Year 1 with teachers already familiar with pupils, their individual qualities, talents, attributes and needs.

All Foundation Stage staff contribute to pre-school curriculum planning and delivery to address the 7 Areas of Learning, early Literacy and Numeracy skills as well as Personal Social and Emotional Development laying foundations for access to the curriculum. It is this coherent, collaborative approach that has led to significant educational benefits for Mill Strand Integrated pupils in recent years.

The provision of 26 additional Nursery places will also enable the school to continue the practice of creating two equally balanced Year 1 classes, taking into account the different personalities, qualities, talents and needs of the whole year group, currently facilitated through non-statutory pre-school places. This enables the school to not only put in place appropriate educational provision from the earliest possible opportunity but it also allows the school to create two equal classes that will help the school maximise educational outcomes for the whole year group throughout its seven years of primary education.

By bringing all pre-school provision under the umbrella of DE /ETI the school would not only reduce the bureaucratic burden of having to operate two parallel management systems, it would also enable all pre-school provision to fall under the remit of the ETI.

The school believe that this would further enhance and support the high quality of pre-school provision already in place.

- **How Would the Proposal Benefit Children?**

Transition to primary education is a significant milestone in a child's development. The ETI acknowledge and support the assertion of the school that children will benefit from the likelihood of smooth transition between pre-school and Year 1. Having 26 additional Nursery places would enable the school to continue to provide a very high quality of transition for all pupils entering the school and not just those who have gained one of the existing 26 Nursery places at the school.

The school believes that transferring to a school that pupils are already familiar with, feel secure and happy in, as well as being already fully aware of the needs of each individual pupils entering the school can only be beneficial to children. A Buddy system operates in Mill Strand IPS in which pupils attending the Nursery develop 'Buddies' from the school's Year 6 during their pre-school year. These 'Buddies' engage regularly with each other through play, story sessions and off-site visits. These relationships are maintained following transition, with the Year 1 pupils keeping the link with their 'Buddies' who are now in Year 7. Social Services, Early Years' regulations for Playgroups prevents playgroup children from having this Buddy system of support or from having any engagement with other pupils and staff in the school. It also prevents these children from joining the Nursery pupils for lunch in the dining hall or playing with them in the outdoor Nursery playground. The approval of 26 additional Nursery places would enable all pre school children to benefit from the same opportunities for learning and their personal, social & emotional development.

The school would further argue, that important relationships and friendships are developed in this pre-school year along with a familiarisation of the ethos of the school and that it is essential that these are maintained. It is unacceptable therefore that these bonds and friendships should be broken at the age of four on the basis of religion. These relationships extend well beyond the pupils in the classroom. They include relationships between children outside school, parents, grandparents and the wider community. Mill Strand Integrated School's Nursery further develops this through a child centred 'open

door' policy at drop off and has been able to develop exceptionally strong family and community links as a result. The provision of 26 additional part-time places at Mill Strand Integrated School would ensure that all pupils enrolling in Year 1 have access to the same developmental opportunities in their pre-school year.

- **Equality of Opportunity & Early Intervention including specific provision for SEN**

The importance of early intervention & support has been underlined in the Chief Inspector's Report 2012-2014 and cannot be overstated, particularly regarding educational outcomes. Mill Strand Integrated School currently has 28% of pupils in receipt of Free School Meals and 19% of its pupils registered with Special Educational needs, including 8 with full Statements. In September 2017, nine pupils enrolled in Year 1 who did not have the benefit of pre-school provision or at either of Mill Strand Integrated School's Pre School settings. It is significant that five of these pupils demonstrate significant, previously unaddressed SEN including Social Emotional & Behavioural needs, Learning Difficulties and ASD. These needs now require immediate intervention in Year 1, a full year after they should have been identified and addressed, enabling equality of opportunity for all pupils entering primary education.

The provision of 26 additional part-time Nursery places at Mill Strand Integrated School would enable the school to ensure that all pupils entering Year 1 the following year would not only have had access to an equally high quality of pre-school provision but also equality of early identification of needs and intervention, raising the long-term educational outcomes for the pupils concerned.

6. IMPLEMENTATION PLAN

The Governors of Mill Strand Integrated School & Nursery have determined that they will continue to "*strive to meet **demonstrated parental demand** for pre-school education at the area's only integrated primary school*". To do this, the existing Playgroup can be supported for a further year if necessary. It is therefore feasible that the implementation of this plan, if approved, would allow for 26 additional part-time places from September 2018.

The school has already secured 'expressions of interest' from 46 families, and will apply its published criteria against all Open Enrolment applicants in the coming weeks to fill the school's existing 26 Nursery places and, outside the PEG process, its 23 Playgroup places. A waiting list will then be drawn up from remaining applicants listed in criteria order.

Should this Development Proposal be approved the unfunded Playgroup places can easily be transferred to funded Nursery places with any unfilled places being filled from the waiting list.

As the school has already put in place a facility for pre-school children, no additional physical work or resources are required. Existing teaching and non-teaching staff would be retained on temporary contracts pending the advertisement and appointment of permanent staff at a time conducive to the operation of the new Nursery setting within the 2018/19 academic year.

Mill Strand Integrated School & Nursery would continue to operate with 52 Nursery places in its existing accommodation at Dhu Varren pending the completion of its new build for September 2021. At this point, it would be feasible to have in place a double Nursery Unit on site at the school's new, double intake, school.

This change would have a positive impact on the management of the school. As Playgroup provision operates under NHSS Registration through Early Years Social Services rather than DE the school currently has to facilitate two different operating and management procedures with separate management boards. This effectively prevents the integration of the Playgroup pupils into the school, the engagement of Playgroup children with Nursery children and adds significantly to the workload of senior management in the school.

The provision of 26 additional part-time Nursery places would enable these pupils to realise the same benefits as Nursery pupils and also better facilitate joined play for the whole year group, assessment of needs and team teaching by all pre-school staff.

7. RESOURCE IMPLICATIONS

Using 2016/17 Common Funding Formula (CFF) values, a high-level budget estimate to implement the proposal would be in the region of £73k (full-year cost) and £43k (in-year cost). While Mill Strand IPS could expect to receive a budget increase of this scale as part of the outworking of the CFF, it would not be an additional pressure on the Aggregated Schools Budget as funding follows the destination of pupils, whichever school they attend. Any additional recurrent costs would be a charge against the school's existing budget.

There will be capital requirements if the development proposal is approved but these can be included in the overall Fresh Start plans and financial support for the new school. There is sufficient space on the current site to accommodate a nursery unit.

As pre-school education does not qualify for transport assistance the provision of 26 additional part-time places would not contribute to any additional transport costs.

Education and Training Inspectorate (ETI) Comments

ETI Development Proposal Commentary Paper

Date of last ETI report: 28 May 2012

Web link: <https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/%5Bcurrent-domain%3Amachine-name%5D/focused-inspection-millstrand-integrated-primary-school-and-nursery-unit-portrush.pdf>

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

At the time of its last inspection (2012), the overall effectiveness conclusion was good. The school's enrolment has increased significantly from the time of its last inspection in 2012 from 190 children (including the nursery unit) to 274 children in 2018. There are an additional 23 children in its pre-school provision. District Inspector activity has noted that the school has progressed well since its last inspection. There has been a change in personnel and the school seems to have improved in some areas. The classes are all quite large; however, the teachers cope well with securing engagement and most secure effective or very effective learning. The data provided by the school shows a diminishing trend of underperformance. The principal works alongside a proactive BoG. Since the last inspection, the school has definitely come forward in many areas.

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

There is a number of schools in the immediate area around Portrush and Portstewart and competition is keen in attracting children to attend these schools. The schools in the wider local area provide well for the children in this locality. As a consequence, competition to attract children is very keen and as a consequence, providing a pre-school provision can help attract applications for primary 1. Consequently, this DP has significant wider ramifications.

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

- The school is popular and according to the data supplied is heavily over-subscribed. There appears to be 50 applications for 26 places.
- The overall enrolment trends for the school and the P1 intake over a number of years are on the increase.
- At the time of the last inspection, provision was good, with improvements appearing to be sustained since following a District Inspection Visit.

Potential Concerns

- There is potential for 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.
- There is potential for increased uptake of younger children into statutory nursery settings and the consequent increased cost on public funds.
- There is a potential impact on existing cross-community provision in respect of the duty to promote, encourage and facilitate Shared Education.
- There are accommodation issues that would need to be addressed.

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

There is a need to confirm that the current accommodation on the Dhu Varren site is able to cope with a further intake of children, should the proposal be granted. The school has increased its numbers significantly since its last inspection and it is interesting to note the endeavours that are currently taking place to address issues around accommodation.

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.			X
	1.2 No more than <u>two</u> composite year groups in a single classroom at primary school level.	X		
	1.3 A <u>minimum</u> of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers.	X		
	1.4 The ability of the school to cater for children with Special Educational Needs.	X		
	1.5 The ability at post-primary level to be able to provide suitable access to the entitlement framework including, where appropriate, linkages with other schools, the FE sector or other providers.			N/A
	1.6 The standards and the quality of learning and teaching at the school.	X		
	1.7 The range of curricular and extra-curricular activities available for			X

	children including career guidance, physical education, music, art, drama and science.			
	1.8 The quality of the <u>physical</u> environment for learning and teaching i.e. the condition, energy and water efficiency and suitability of the buildings.			X Issues around accommodation are in the main body of this proforma
	1.9 The quality of, and arrangements for, pastoral care including the active promotion of the principles of social justice in all areas of the formal and informal curriculum.	X		
Strong Leadership and Management by Boards of Governors and Principals	4.1 Governors' views on the school based on quantitative and qualitative evidence.			X
	4.8 There is a school development plan in place and progress is being made to achieve the plan's aims and objectives.	X		
	4.9 Pupil behaviour, expulsions, suspensions and non-attendance as well as positive behaviours such as involvement in school management (e.g. buddying and mentoring schemes).			X School has a buddy system in place. Data not available.
Strong links with the Community	6.1 Degree and quality of parental involvement (schools will be asked to provide evidence on this).			X
	6.3 Contribution of the school to the community (schools will be asked to provide evidence on this).	X		
	6.4 Presence of other features of provision, e.g. nursery or specialist unit.	X		

6. Overall conclusion of impact of the proposal

ETI acknowledges that the school is presently a popular option for many parents and that the pre-school provision is over-subscribed. ETI also notes that there is the potential for an adverse impact on some of the neighbouring early years providers, particularly those who are under-subscribed at present. If the proposal is approved, there would be a need to confirm that the out-workings do not impact adversely on neighbouring providers and that accommodation is adequate for an additional children. The ETI recognise, however, the Department of Education's responsibility to facilitate the availability of integrated education opportunities to children and their parents.

Responses Received During the Statutory Two Month Objection Period



Area Planning Policy Team

DE, Rathgael House

16th July 2018

Dear Sirs

Mill Strand IPS Development Proposal

NICIE wishes to register support for Development Proposal No 542 for Mill Strand IPS. Please find the NICIE commentary attached. I would be grateful for an acknowledgement of receipt of this commentary.

If you need anything else or more detail, please do not hesitate to contact me.

Yours faithfully,

Lorna McAlpine

Senior Development Officer

NICIE Commentary on Development Proposal

No. 542

Mill Strand Integrated Primary School, Portrush

Proposal

The Board of Governors of the grant maintained Mill Strand Integrated Primary School propose to establish an additional 26 part-time nursery places at their grant maintained integrated primary school with effect from 1st September 2018 or as soon as possible thereafter.

Introduction and 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 and extra work and commitment on behalf of the whole school community including the Board of Governors (BoG).

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

The 1998 Education Order removed the prohibition on integrated schools having integrated nursery units. At the same time the Pre-school Education Expansion Plan was making significant capital available to the statutory sector to provide nursery units. The integrated sector already had several pre-school settings, so the capital required to bring them up to DE Handbook standards was much less than that required to develop entirely new buildings. The policy within the Department of Education and conveyed to NICIE by senior officials was that if a playgroup had a substantial number of PEAG funded places it could then be transferred across to nursery status units using the normal development proposal and economic appraisal process.

From September 1999 onwards, a dozen pre-schools were transferred to nursery status as the funded places grew in each setting. The capital from the Pre-school Education Expansion Plan was used to provide, in the main, small alterations to most settings. This represented an inexpensive way for the Department of Education to reach its target of 50% of places in the statutory sector and 50% in the voluntary sector. From September 2018, a total of 17 Grant Maintained Integrated primary schools will 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 6 playgroups co-located within the grounds of the schools.

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

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

The importance of a sustainable pre-school service and early intervention was highlighted by the Chief Inspector's Report 2012-2014. The 2014-16 Report subsequently 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 argue that transition and continuing professional development are easier to achieve 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. in a nursery unit setting than a voluntary playgroup for the following reasons. The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI).

Despite the problems that managing playgroups have presented to Boards of Governors and Principals, Mill Strand IPS and others have remained committed to the provision of integrated pre-school because they are aware of the importance of children having positive experiences of Protestant, Catholics and others from different backgrounds from as early an age as possible, as shown by Professor Paul Connolly’s research. It is also noteworthy that Integrated primary schools 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 submitted a paper to DE officials in July 2017 outlining the implications of pre-school policy on the development of integrated pre-school provision. Subsequently, DE wrote to EA and CCMS on 31st October 2017 to point out, *“It is important the Education Authority and the Pre-School Education Group (PEG) support the department in fulfilling its statutory duty by striving to meet **demonstrated parental demand** in an area for pre-school education at grant-maintained and controlled integrated primary schools, as well as parental demand for Irish-medium pre-school education.”*

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

In Appendix 2 NICIE has collated the list of meetings and extracts of EA minutes where the four 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

Table 2 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
EA Board	31 May 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.

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.

Non-sectoral nature of pre-school provision

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

Whilst the Department of Education has often asserted that pre-school provision should be non-sectoral, the Department's own statistics show that the reality is that few Catholics attend Controlled nursery units and schools and even fewer Protestants attend Catholic nursery units and schools.

In 2017/18, only 24 Protestants attended Catholic Maintained Nursery Schools which offered 1720 places (this represents 1.4%); 69 Protestants attended Nursery Classes in Catholic Maintained schools which offered 4021 places (1.7%). The figures for Catholics attending Controlled Nursery Units are 580 out of 4570 places (12.7%). However, if one looks closer, it is clear that this mixing is mainly happening in those controlled nursery schools which pre-date the Pre-School Education Expansion Plan. (1153 out of 4117, 28.0% Catholic)

On the other hand, Integrated Nursery provision (GMI and Controlled), demonstrates figures of 32.5% Protestant and 38.6% Catholic in 2017/18. These latter statistics, in the integrated nursery units and the older controlled nursery schools, are the only ones which we believe represent non-sectoral nursery school settings.

Referring to the 2017/18 Department statistics and using the value of 20% to 79.9% Catholic as a basic measure to denote a setting in which both of the main traditions are represented and can attend comfortably, the statistics reveal the following:

- Twenty out of the 95 existing nursery schools have between 20% and 79.9% Catholic, this is a total of 21%
- Seventy-one playgroups out of a total of 383 have a balance of between 20% and 79.9% Catholic, i.e. 18.5%. If one discounts the 8 PEG funded integrated playgroups, then 16.4% of playgroups meet this notional measure of balance.
- Forty out of 243 nursery units, i.e. 10% have between 20% and 79.9% Catholics. If one discounts the 21 integrated nursery units, just 8% of nursery units achieve this balance.

Given these statistics, there is little evidence that pre-school provision is in fact non-sectoral.

In the case of Mill Strand IPS as is demonstrated below, this particular situation is crystallised by the shortfall of perceived non-sectoral provision in the Portrush area.

Introduction to Mill Strand IPS pre-school provision

Mill Strand IPS had its genesis in a parent-led initiative to bring about integrated education to children in the North Coast area. Mill Strand Integrated Primary School was set up in 1987, with 52 pupils, by a group of families who had to re-mortgage their homes to raise the funding. The school ran on charitable donations for two years before the then Education Minister Brian Mawhinney gave Integrated Schools recognised status in the 1989 Education Reform Order (NI). The nursery was established at the same time, but not given status as GMI nursery unit until June 2001, after the removal of the prohibition of the funding of integrated nurseries in the 1998 Education Order (NI). Due to social deprivation these were increased to full time places in November 2009. The Pre-School Playgroup at the school was established for September 2015 to meet parental demand for places at an integrated setting and was registered for 20 children.

A proposal to increase the Admissions Number in the school to 58 was given approval in July 2017, whilst a proposal to increase the nursery places to 52 was not approved.

In 2017/18 the school had 27 children (TF) enrolled in the Nursery Unit (Source: EA website) and a further 23 children in the school's Pre-School Playgroup. In the coming 2018/19 year there are 26 children enrolled in the Nursery Unit and 23 children (the maximum permitted) in the privately funded playgroup.

The school accommodation consists of 12 classrooms, a small Learning Support room, assembly/dining/PE hall, secretary's office and principal's office. Six of the classrooms are in the permanent building, one of which, the Nursery, is accommodated in the original house in which the school was founded. The Secretary's office, Principal's Office, Learning support room and staffroom are also located in this two-storey building. Six of the classrooms are located in mobile units.

Additional mobile classrooms are being provided to meet the going needs of the school since the approval of the Development Proposal for the double intake in commencing in September 2017.

The school was approved to plan for a new 14 class school plus nursery accommodation under the Fresh Start Agreement in March 2016.

The current teaching staff consists of principal, 9 full-time teachers and 2 part-time/job share teachers. The classroom assistants, secretary, building supervisor, cleaners, supervisory assistants, meals staff and staff in the additional pre-school centre complete the full staff team.

Current Proposal

Table 3 Applications and Admissions to Mill Strand Nursery Unit

Year	Total number of places available	Total number of 1st preference applications	Total number of applications	Total number of places allocated
2018/19	26	59	61	26
2017/18	27	58	61	26

The Governors in bringing forward this proposal are responding to consistent and growing over-subscription in the existing nursery unit.

The figures for 2011/12 to 2016/17 are included in an attached Excel spreadsheet supplied by the EA and as is demonstrated above (Table 3) in the more recent years there is a level of over-subscription equivalent to more than double the places, at first preference.

Another significant reason for seeking the change is to assist the school in reducing the bureaucratic burden related to managing and governing under two separate funding and governance mechanisms, thereby supporting the school to deliver improved outcomes for children and to become a more sustainable school. In addition, this would support the DE by assisting in its duty 'to encourage and facilitate the growth of integrated education. Also, to realise the objectives of Area Based Planning which include 'The aim of the plan is to facilitate the development of a network of viable and sustainable primary schools which can effectively deliver the Northern Ireland Curriculum.

The Board of Governors of Mill Strand 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.

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

One of the objectives of the recent draft of the Strategic Area Plan is to "sustain strong, successful and viable schools." The Mill Strand IPS development proposal is in the current Area Action Plan. The Providing Pathways plan also makes reference to dealing with the increase through encouraging and facilitating sustainable integrated schools by developing proposals to address the growth. Approving this proposal would assist the DE in fulfilling its duty under Article 64 of the Education Reform Order (NI) 1989, 'to encourage and facilitate the growth of integrated education.'

Characteristics of the Area and School Enrolment at Mill Strand IPS

The council area in which the school is located, Causeway Coast and Glens experienced a population increase, between 2005 and 2015 of 5%. (NISRA website).

The religious balance figures for the Causeway, Coast and Glens Council based on the 2011 Census are **40.21%** belong to or were brought up in the Catholic religion and **54.79%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. The former Coleraine Council area had slightly less balanced figures **28.02%** belong to or were brought up in the Catholic religion and **65.28%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. This latter set of figures more closely resemble Mill Strand's balance and indeed the school draws from most of the former Coleraine Council Area.

In Atlantic Ward, where the school is located, according to the 2011 Census; **30.88%** belong to or were brought up in the Catholic religion and **61.12%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. In Atlantic ward **23.28%** of households did not have access to a car or van and **33.27%** had no or low (Level 1*) qualifications.

Table 4: Ward Information for Pupil Enrolment at Mill Strand IPS in Nursery and Pre-School Playgroup in 2017/18 and 2018/2019

Ward	No of Pupils 2017/2018	No of Pupils 2018/2019	% Catholic	% Protestant	Deprivation
Atlantic	7	8	30.88	61.12	212
Ballylough	*		4.79	91.37	137
Cross Glebe	*	*	21.95	71.03	54
Dundooan	*	10	24.21	68.16	468
Dunluce	*	*	6.08	89.2	442
Hopefield	17	13	22.23	70.34	478
Knocklynn	*		18.2	74.15	528
Mount Sandel	*	*	31.4	61.42	443
Royal Portrush	*	*	27.81	63.14	145
Seacon	*		14.68	78.24	354
Strand (Coleraine lgd)	*	*	40.24	53.98	568
The Cuts	*	*	40.21	54.79	490
Ballysally		*	13.04	76.44	72
Ringsend		*	49.78	46.19	314

The nursery unit is also over-subscribed, and a Temporary Flexibility request was granted in 2017/18. In September 2015, the school opened a pre-school playgroup with funding from the Integrated Education Fund and this has attracted a steady enrolment.

The Ward analysis of the postcodes in Table 4 shows that the pupils came from 12 wards in 2017/2018 and 11 wards in 2018/2019. Whilst the former Coleraine LGD is **28.02%** Catholic and **65.28%** Protestant as noted above from the 2011 Census, the wards the pupils come from vary greatly in that they are very different in nature, one ward is only 4.79% Catholic, and another is 49.78% Catholic.

With regards to deprivation it is important to note that approximately 10% of the children attending the two pre-school facilities come from the top 25% of the most deprived wards in Northern Ireland.

Special Needs

Mill Strand IPS has a number of children on the SEN Register. In 2016/17 there were 21.8% children enrolled at the school with Stages 1-5 SEN and in 2017/18, 19.3%. . (Source: DE Census). Access to assessment and support has been much more difficult to obtain in a playgroup setting than in an established nursery, therefore establishment of a statutory nursery unit would be supportive of children with SEN.

Free School meals

Free School Meals (FSM) entitlement at Mill Strand IPS was 33.9% in 2016/17 is currently 29.2%.

Reasons to consider approval

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

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.

Additional reasons to approve this proposal include:

- Approval for this proposal would allow the school to run more effectively under one funding, management, registering and inspection stream. NICIE and Mill Strand IPS are very mindful of the equal value equated to pre-school provision in both nursery units and playgroups and the excellent provision available in both types of settings throughout Northern Ireland.
- From a management perspective NICIE supports Mill Strand IPS in making this request and asks that careful consideration is given to allow Mill Strand IPS Playgroup to move to nursery status to reduce the bureaucratic burdens placed on the school. Operating a nursery unit and a playgroup requires different management structures and different inspection bodies for what is effectively identical provision. The school does not seek this change lightly. The principal has been fully involved in the playgroup and appreciates that the Department’s position is that there is no difference between a well-run nursery and a well-run playgroup.
- It would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion.
- The school has highlighted that the Northern Health and Social Care Trust, the registering authority for the playgroup, require the school to adhere to a number of procedures as part of their requirements. In a letter to the school dated 19th August 2016, the Early Years Panel have asked “that reasonable steps would be taken to avoid congested areas within the school such as 9.00am, 10.45am and 12.40 and outdoor play would be timetabled to ensure children do not mix with others within the setting and the Early Years Panel viewpoint on this remains unchanged.” In practice this means that the school cannot allow the children in the playgroup to mix with the children in the

statutory nursery unit at Mill Strand IPS except for the school nativity as long as appropriate risk assessment is in place according to the Health Trust requirements of registration. This is only allowed as it would be time limited. Therefore approval for an additional 26 statutory nursery places at Mill Strand IPS would allow the school to operate under one management system, LMS.

- NICIE contends that if DE was to approve the conversion of the existing (non-PEAG funded) playgroup at Mill Strand IPS, it would represent replacement rather than displacement of an existing playgroup.
- The Nursery Unit is regularly over-subscribed: Source EA

59 (1st preference) for 26 in 2018/19;
 58 (1st preference) for 26 in 2017/18;
 34 (1st preference) for 26 in 2016/17;
 41 (1st preference) for 26 in 2015/16;
 25 (1st preference) for 26 in 2014/15;
 45 (1st preference) for 26 in 2013/14 and
 29 (1st preference) for 26 in 2012/13.

In response to the oversubscription in 2015/16 (41 first preferences), the Board of Governors took the decision to establish a Pre-School Playgroup in order to be able to accommodate demand for an integrated pre-school place quickly. The setting has been approved to accommodate 23 children and that is the number due to start in September 2018 and also the total that attended in 2017/18. In 2016/17, 20 children were accommodated in the school's playgroup and in 2015/16, 17 children were enrolled. Even with the opening of the Pre-School Playgroup at Mill Strand IPS Table 5 shows that children are still coming to school having had no pre-school experience. It is particularly concerning that nine children arrived in P1 in 2016 with no pre-school experience. This amounts to over 17% of the P1 intake which is not in keeping with the Minister's Pre-School Education Target.

Table 5: Pre-school experience of P1 intake at Mill Strand IPS from 2012 -2017

Year	Total intake	No Experience	Nursery	Private /Voluntary
2012	#	0	26	*
2013	#	0	22	*
2014	#	*	27	*

2015	#	*	26	*
2016	53 (includes Transfers from Mill Strand IPS Playgroup)	9	27	17
2017	52(includes Transfers from Mill Strand IPS Playgroup)	*	28	*

The nine children with no pre-school experience for September 2016 were largely designated as other religions or no faith.

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 stating “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.

Impact on other settings

This Development Proposal has been notified in the current Area Action plan. Table 7 shows the P1 children in Mill Strand IPS have attended a number of other pre-school settings.

A substantial majority of the pre-school cohort of children attending Mill Strand IPS Nursery Unit and Pre-School Playgroup enrol in P1 at Mill Strand IPS as demonstrated in Table 7 below. The remainder of the P1 children come from a variety of other settings.

In the case of the Portrush area, there has no substantial impact on other settings since the opening of Mill Strand IPS Pre-School Playgroup as evidenced by the table in Appendix 1 (Source: EA) which outlines the admissions and enrolments for pre-school providers in the area, some of which are also oversubscribed.

Table 6 below shows that the admission of under-age children to statutory provision has not be a significant factor in this area.

Table 6: Underage Pre-School Statistics provided by EA July 2018

	2017/2018				2018/2019			
	1st Pref Applications T/A	1st Pref Admitted T/A	1st Pref Applications U/A	1st Pref Admitted U/A	1st Pref Applications T/A	1st Pref Admitted T/A	1st Pref Applications U/A	1st Pref Admitted U/A
Mill Strand IPS NU	50	26			53	26	6	0
Portstewart PS NU	29	26	*	0	23	21	*	*

Table 7: P1 Pre-school Experience of P1 intake at Mill strand IPS

Year	Name of Setting	No of Children	Total No Admitted
2017/2018	Mill Strand IPS Nursery Unit	27	52
	Mill Strand IPS Playgroup (unfunded)	17	
	Causeway Pre-School	*	
	Portrush Pre-School	0	
	Portstewart Nursery Unit	*	
	St Colum's Pre-School Centre	0	
	Stepping Stones Creche, Portstewart	0	
	Nursery outside are e.g. Isle of Man/Enniskillen	*	
	No pre-school	*	
2016 / 2017	Mill Strand IPS Nursery Unit	27	53
	Mill Strand IPS Playgroup (unfunded)	17	
	Causeway Pre-School		
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		
	No pre-school	9	
2015 / 2016	Mill Strand IPS Nursery Unit	26	28
	Mill Strand IPS Playgroup (unfunded)		
	Causeway Pre-School	* to be inserted as appropriate	
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		

	No pre-school	*	
2014 / 2015	Mill Strand IPS Nursery Unit	27	
	Mill Strand IPS Playgroup (unfunded)		
	Causeway Pre-School	* to be inserted as appropriate	
	Portrush Pre-School		
	Portstewart Nursery Unit		
	St Colum's Pre-School Centre		
	Stepping Stones Creche, Portstewart		
	No pre-school	*	32

Tables 5 and 6 in the Case for Change showed the Applications and Admissions in 2017/18 in a two and three mile radius and demonstrated a shortfall in provision at first preference and when considering the Total Applications.

These tables have been updated for 2018/19 using EA figures from June 2018, see Tables 8 and 9 below. There were 100 first preference applications in a two mile radius of Mill Strand IPS but only 73 places available and only 69 allocated.

If the provision at three miles is added in there are 146 first preferences for 123 places.

Given that Mill Strand has provided 23 extra non-funded places in the playgroup in both 2017/18 and 2018/19 this may be masking a further unmet demand for places.

Table 8 Alternative Pre-school/Nursery Provision within a 2 miles radius

School Name STATUTORY	Year School	No of places available	No of 1st pref App	Total No of Applications	Total Admitted	No
Mill Strand IPS Statutory Nursery Unit	2018/19	26	59	61	26	
VOLUNTARY PROVIDERS						
Portrush Community Playgroup (Situated at Portrush PS)	2018/19	26	27	33	26	
Causeway Pre-School (Situated at St Patrick's PS)	2018/19	21	14	24	17	
TOTAL		73	100	118	69	

Table 9 Alternative Pre-school/Nursery Provision within a 3 miles radius

School Name STATUTORY	Year School	No of places available	No of 1 st pref App	Total No of Applications	Total No Admitted
Portstewart PS Statutory Nursery Unit (Situating at Portstewart PS)	2018/19	26	24	33	23
VOLUNTARY PROVIDERS					
St Colum's Pre School (Situating at St Colum's PS)	2018/19	24	22	28	24
TOTAL		50	46	61	47

Source: EA

Table 10: Religious Balance in the local settings 2016/17

Funded Providers	No. of Protestants	% Protestant	No. of Catholics	% Catholic	No. of Others	% Others	Total
Mill Strand IPS Nursery Unit	10	37.0	7	25.9	10	37.0	27
Causeway Pre-School	*	*	#	#	0	0.0	15
Portrush Pre-School	17	58.6	6	20.7	6	20.7	29
Portstewart Nursery Unit	12	46.2	0	0	14	53.8	26
St Colum's Preschool Centre	*	*	#	#	*	*	20
Stepping Stones Creche	#	#	*	*	0	0.0	10

Table 11: Religious Balance in the local settings 2017/18

Funded Providers	No. of Protestants	% Protestant	No. of Catholics	% Catholic	No. of Others	% Others	Total
Mill Strand IPS Nursery Unit	*	*	8	30.8	14	53.8	26
Causeway Pre-School	*	*	#	#	5	45.5	11
Portrush Pre-School	#	#	*	*	*	*	21
Portstewart Nursery Unit	16	61.5	0	0	10	42.3	26
St Colum's Preschool Centre	0	0	0	0	12	100.0	12
Stepping Stones Creche	*	*	5	50.0	*	*	10

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

As has been discussed earlier in the section on Non-Sectoral Nature of Pre-School Education, Tables 10 and 11 demonstrate that only the statutory provision in Mill Strand IPS is providing a religiously integrated provision with representation from Protestant, Catholic and Other backgrounds over both years; 2016/17 and 2017/18.

It is also appropriate to look at provision in the broader East Londonderry Constituency area, as outlined in Table 12 (below). There is huge discrepancy between the number of children applying for places and the number of places ultimately allocated to them and also in relation to the number of places available. Some 315 of the total applications and 72 of the first preference applications did not result in the allocation of a place. This is concerning given that Mill Strand IPS has noted that a number of children over the past few years have been arriving

to P1 without pre-school experience. This may also imply that families are not either able to access provision where they desire or which they feel comfortable attending

Table 12 - Shortfall in Pre-School Provision for East Londonderry Constituency – 2018/19

Total number of places available	Total number of 1st preference applications	Total number of applications	Total number of places allocated
1116	1151	1394	1079

Source: EA stats 2018/19

It is worth noting that at 11th July 2018 the EA website indicates that there are no spare pre-school places in the Portrush, Portstewart and Coleraine triangle. Further the EA website shows that the only places remaining in Causeway Coast and Glens area at some distance from Mill Stand IPS; in Ballycastle, Ballykelly, Cushendall, Cloughmills, Loughguile and Kilrea. This would indicate that a review of provision is required to better meet the needs of children and families. However, this does not negate the need to deal with demonstrated parental demand for integrated pre-school places to support the growth of the two-form entry at Mill Strand IPS which was approved for September 2018

Impact on other integrated provision

Other integrated settings (Carhill CIPS, Ballycastle CIPS, Ballymoney CIPS) of these three schools only one has a nursery unit, Ballycastle CIPS (19.8 miles away) which is oversubscribed and too far away to be impacted. All the schools serve catchment areas which are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, is a realistic option for parents seeking integrated provision

Concluding Remarks

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

It would appear that Mill Strand IPS has in recent years met a previously unmet demand. This is evidenced by the high level of oversubscription at Mill Strand IPS (Nursery Unit) as well as other settings in the area and the demand for places in an integrated pre-school playgroup setting by parents. NICIE would argue that displacement is not an issue for this proposal owing to Mill Strand playgroup already accommodating 23 children in both 2017/18 and 2018/19.

NICIE would urge the Minister to support this proposal as it represents an opportunity to support a sustainable school into the future. The school has already been announced as being progressed under the Fresh Start Agreement (23rd March 2016). It would also help those who wish to choose an integrated option and address any shortfall for pre-school places in the area as well as providing additional places for those who are arriving at school without pre-school experience.

The school draws from wards which have been affected by the conflict and research is beginning to expose the trans-generational aspects of the troubles. 'Towards a Better Future: the Trans-generational Impact of the Troubles on Mental Health.' (Prepared for the Commission for Victims and Survivors by Ulster University, March 2015). Indeed, the Victims and Survivors Forum members' "consideration of the conflict's trans-generational legacy recognised the imperative of examining the role of early years education in supporting parents and addressing sectarianism."

This proposal therefore represents a positive move forward for the whole school community.

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

References:

The Report of the Independent Review of Integrated Education to Mr Peter Weir MLA, Minister for Education, Northern Ireland by Prof Margaret Topping and Mr Colm M Cavanagh

<https://www.education-ni.gov.uk/sites/default/files/publications/education/Integrating%20Education%20Report.pdf>

www.ninis.nisra.gov.uk

www.eani.org.uk

www.education-ni.gov.uk

Appendix 1

School Name	Type	Enr No	F/T-P/T	School year 2011/12										School year 2012/13									
				Stage 1				Stage 2						Stage 1				Stage 2					
				1st Pref Apps	1st pref admitted	Total apps	Total Admitted	Total Apps			Total Admitted			1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted		
				T/A	U/A	Total	T/A	U/A	Total					T/A	U/A	Total	T/A	U/A	Total				
Causeway Pre-school	V		P/T																				
Millstrand Integ. Nursery Unit	Sch	26	F/T	27	26	28	26	29	6	35	26	0	26	32	26	37	26	37	*	#	26	0	26
Portrush Pre-School PG	V		P/T	23	23	24	23	24	0	24	23	0	23	22	22	23	23	23	0	23	23	0	23
Portstewart Nursery Unit	Sch	26	F/T	35	26	35	26	35	14	49	26	0	26	36	27	38	27	34	*	#	26	0	26
St Colum's Pre-School Centre	V		P/T	23	23	23	23	23	0	23	23	0	23	20	20	24	23	24	0	24	24	0	24
Stepping Stones Creche, Portstewart	V		P/T	6	6	7	7	9	0	9	9	0	9	11	8	12	8	11	0	11	8	0	8

School Name	Type	Enr No	F/T-P/T	School year 2013/14										School year 2014/15									
				Stage 1				Stage 2						Stage 1				Stage 2					
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted		
				T/A	U/A	Total	T/A	U/A	Total					T/A	U/A	Total	T/A	U/A	Total				
Causeway Pre-school	V		P/T											15	15	16	16	18	0	18	16	0	16
Millstrand Integ. Nursery Unit	Sch	26	F/T	45	26	46	26	46	6	52	26	0	26	25	24	30	26	29	0	29	26	0	26
Portrush Pre-School PG	V		P/T	20	20	24	24	24	0	24	24	0	24	30	30	31	31	32	0	32	32	0	32
Portstewart Nursery Unit	Sch	26	F/T	26	24	30	26	30	13	43	26	0	26	40	26	41	26	41	5	46	26	0	26
St Colum's Pre-School Centre	V		P/T	22	22	23	23	25	0	25	24	0	24	14	14	18	18	21	0	21	21	0	21
Stepping Stones Creche, Portstewart	V		P/T	9	9	9	9	9	0	9	9	0	9	7	7	8	8	9	0	9	9	0	9

School Name	Type	Enr No	F/T-P/T	School year 2015/16										School year 2016/17									
				Stage 1				Stage 2						Stage 1				Stage 2					
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted		
				T/A	U/A	Total	T/A	U/A	Total					T/A	U/A	Total	T/A	U/A	Total				
Causeway Pre-school	V		P/T	10	10	10	10	13	0	13	13	0	13	15	15	16	16	16	0	16	16	0	16
Millstrand Integ. Nursery Unit	Sch	26	F/T	41	26	45	26	41	6	47	26	0	26	34	26	36	26	36	*	#	26	0	26
Portrush Pre-School PG	V		P/T	28	28	32	32	32	0	32	32	0	32	32	32	34	32	32	0	32	32	0	32
Portstewart Nursery Unit	Sch	26	F/T	29	26	32	26	31	9	40	26	0	26	33	26	33	26	33	*	#	26	0	26
St Colum's Pre-School Centre	V		P/T	32	32	33	32	35	0	35	32	0	32	18	18	22	22	22	0	22	22	0	22
Stepping Stones Creche, Portstewart	V		P/T	8	8	9	9	10	0	10	10	0	10	11	10	14	10	14	0	14	10	0	10

Appendix 2

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

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
EA Board	31 May 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.

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 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 Derryagh 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.

Mrs McAlpine 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 [REDACTED], seconded by [REDACTED], the Committee approved the Response* (Appendix D) for submission to DE along with the publication of the Proposal. ([REDACTED] 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 [REDACTED] 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, [REDACTED], 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 ██████████ should seek his own independent legal advice on the matter. ██████████ 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;

- 1st 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 1st 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 1st 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. [REDACTED] 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. [REDACTED] 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. [REDACTED] and [REDACTED] recorded their dissent to the two proposals.

[REDACTED] 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 [REDACTED], seconded by [REDACTED], 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

[REDACTED] 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. ██████████ 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 ██████████, seconded by ██████████, 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. [REDACTED] 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. ██████████ 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. ██████ 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 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.



Controlled Schools' Support Council
2nd floor, Main Building
Stranmillis University College
Belfast, BT9 5DY
T: 028 9531 3030
E info@csscni.org.uk

28 June 2018

RE: Development proposal no 542 Mill Strand 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 542 (DP 542). The 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.

The CSSC welcomed the Department of Education's decision in July 2017 not to approve development proposal 484 to expand the nursery unit at Mill Strand Integrated Primary School with an additional 26 part-time places. This decision was based on evidence which did not support the proposed addition of 26 part-time statutory nursery places on the basis that there was a sufficiency of (PEG assessed, non-sectoral) pre-school provision in the area.

Ten months after this decision the CSSC is concerned to note the publication of DP 542 and whilst Council acknowledges the right for a proposer to publish another proposal where they believe the decision is incorrect or that the circumstances relating to the proposal have changed, it is not apparent from the case for change that additional or new information is presented in support of the new proposal. This raises concerns not only in relation to the efficient use of resources but also in respect of the anxiety the proposal brings for neighbouring schools.

The CSSC recognises the role of the Education Authority (EA) and of the Pre-School Education Group (PEG) in planning for pre-school education provision. The CSSC notes the strong concerns expressed by PEG in relation to the potential displacement of current funded pre-school provision and the impact on existing cross community provision in respect of the duty to encourage, facilitate and promote shared education. EA concern in relation to the increased costs for provision, which is already in excess of demand, is also noted.

The case for change for DP 542 states that approval for, "an additional 26 statutory nursery places would address the mismatch in admissions between the two-form entry in the primary and the single unit entry in the nursery thereby supporting the school to deliver improved outcomes for children, a smoother transition and to become a more sustainable school". The CSSC is concerned that the proposal for additional pre-school provision is not based on assessed need but would appear to be a driver for ensuring the primary school

achieves maximum capacity, without due consideration of the potential impact on the sustainability of other neighbouring schools. The CSSC welcomed affirmation from the

Controlled Schools' Support Council www.csscni.org.uk

Department of Education that it is not their practice to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting¹. There are a number of statutory and voluntary providers in the area which will be impacted by this proposal.

It is noted that additional pre-school places were established at Mill Strand in September 2015, funded by the Integrated Education Fund. The CSSC understands that enrolments in existing voluntary pre-school providers within the area have subsequently declined. PEG notes that some non-statutory settings are operating with already low numbers and that additional provision may affect their sustainability. The influence of provision, which has been established outside the statutory planning framework, needs to be considered to fully understand the impact this is having on the sustainability of existing community provision. The potential impact of the current proposal must be considered not only in relation to pre-school providers in the local area but also across a wider geographical area including, but not exclusively, Coleraine.

Detailed background information on the policies and processes relating to the planning of pre-school provision is contained within the Department of Education Submission for DP 484. This confirms that the planning process is concerned with identifying future educational needs and planning to meet these needs on an area basis. When planning pre-school provision, decisions are made on the basis of providing sufficient places for approximately 95% of the live birth statistics. There is no analysis of live births or population projections in the case for change which suggests that the impact on other providers has not been adequately examined in the context of demographic projections for the area. The former Coleraine District Council Local Government District provides the most relevant footprint for the catchment area of Mill Strand and live births for this area demonstrate a downward trend over the 4 year period 2013-2016 from 717 to 647. The 2016 based population projections for the Causeway Coast and Glens Council area project a decline in the 0-4 age range from 8,800 in 2016 to 6938 in 2041. This 21% decrease indicates that fewer pre-school places are likely to be required in the future.

The 2017 decision in respect of DP 484 affirmed the sufficiency of provision, however, the case for change asserts that there is a shortfall in pre-school provision in the area. It states that there, "is evidence of masking of actual demand and provision [for pre-school provision] because it doesn't include pupils supported by Mill Strand Integrated Primary School". A statement from the 2017 DE submission is quoted: "The level of provision within the two mile radius is currently significantly lower than the planning figure, even if the proposed statutory provision were made available. This would suggest that pre-school education in the area is insufficient to meet demand" (Early Years Team).²

There are 3 significant issues with this assessment as the basis for the assertion that there is a shortfall in pre-school provision. Firstly, the planning process adopted by the Early Years Team, illustrated in Table 8, uses a methodology which relates to the primary 1 population and not the process described by the Department of Education and outlined above which is based on live births. An assessment of pre-school provision based on a 2 mile radius of the

¹ Source: Department of Education 'Development Proposals (DPs) 483 & 484: Mill Strand Integrated Primary School' 6th July 2017

² Source: Department of Education 'Development Proposals (DPs) 483 & 484: Mill Strand Integrated

school presents a second issue as Mill Strand serves the Coleraine, Portrush, Portstewart 'Triangle' area. Thirdly, it is not clear from the analysis in Table 8 of the level of pre-school provision within a 2 mile radius if the number of non-statutory places represents the number of funded places allocated in the years illustrated or the number of places these non-statutory providers are registered for.

The case for change presents two additional tables detailing alternative pre-school provision within a 2 mile radius and a 3 mile radius (Tables 5 and 6). This information does not include all providers named within a subsequent table in respect of religious balance of alternative settings (Table 7). Here it is clear that for the non statutory settings the information presented relates to the number of allocated funded places rather than the capacity of the setting i.e. the number of places for which the setting is registered. The registration figure should be used when assessing the level of provision available to determine sufficiency of funded pre-school education places.

Whilst it is stated that Mill Strand serves the 'triangle area' Portrush, Portstewart and Coleraine there is no reference to this wider catchment area in the analysis of available provision. CSSC understands that over 20% of pupils at Mill Strand travel from beyond the towns of Portrush and Portstewart which is outside the 2 and 3 mile radius used in the analysis. An analysis restricted to a 2 mile radius does not adequately assess provision within the relevant geographical area and the potential impact of this proposal.

The CSSC notes that pre-school education is non-statutory and that area planning, which is the process of strategic planning of primary and post-primary education provision, does not relate directly to this phase of education. However, development proposal 542, if approved, has the potential to threaten the sustainability of neighbouring primary schools. The information contained within the case for change confirms that children attending a nursery unit will almost certainly transition into primary 1 of that school. Increasing nursery places at Mill Strand will inevitably impact on the admissions to primary 1 of neighbouring primary schools. There is already evidence of this happening which correlates with the timeframe of the establishment of the additional non DE funded playgroup at Mill Strand.

The case for change states that, "there is no alternative for parents seeking an integrated education and that this proposal would address the demand for integrated pre-school education and additional integrated pre-school provision". The DE submission in respect of DP 484 (2017) affirmed that pre-school provision is not defined according to sectors (eg Integrated, Controlled), and that all pre-school settings, regardless of location, are considered accessible to children from all backgrounds.

The CSSC strongly endorses the non-sectoral nature of pre-school education and notes that there has been a long history of cross community pre-school provision in the area and an inclusive ethos within local schools, including well established shared education links between schools. DE Circular 2017/09, Guidance on the Publication of a Development Proposal, requires that any significant change to an existing school must be considered in the wider context of the network of schools. Article 5 of the Education and Libraries (NI) Order 1986 requires the EA to ensure that efficient primary and secondary education are available to meet the needs of the community. Article 6 places a duty on the EA to ensure that there are sufficient schools available for providing primary and secondary education. The definition of 'sufficient' refers to the 'character' of the schools as well as the number.

Controlled Schools' Support Council www.csscni.org.uk

This is a significant, overarching role relating to schools in all sectors and of all types. Thus, the EA has a duty as planner of schools that spans all sectors and types. Other statutory duties, including the duty to encourage, facilitate and promote shared education, must be given equal regard in the consideration of this proposal. The CSSC believes that development proposal 542 has the potential to affect the ability of neighbouring controlled schools to remain sustainable and that the needs and aspirations of the whole community are not adequately considered in the case for change.

Table 7 in the case for change illustrates the religious balance of pre-school settings in Portrush and the surrounding areas. This table includes a pre-school setting which is not included in the earlier alternative pre-school provision within a 2 and 3 mile radius of Mill Strand (Tables 5 and 6) and omits a setting which is included in the alternative provision. Owing to the relatively small numbers in some settings the figures are appropriately suppressed. However, this significantly reduces the value of this information which cannot be considered informative or convincing in making the case for change.

Whilst religious education and collective worship is a statutory requirement in primary and post primary schools, the legislation does not apply to special or nursery schools. The curricular guidance for pre-school education (CCEA, 2018) is a requirement for all pre-school settings which are in receipt of funding from the Department of Education. The guidance applies to all statutory (maintained, controlled and integrated) and non-statutory (voluntary and private) settings. The importance of ensuring equality of opportunity is clearly articulated within the guidance which states that children should be encouraged to understand that we see the world in many different ways depending on our cultural, social and religious viewpoints. It also highlights that staff in a setting should acknowledge and respect the culture, beliefs and lifestyles of the families and children in the setting; include activities and resources that encourage respect for diversity; and talk about cultural and religious festivals, discuss foods in different countries, read stories or listen to music from different cultures, and display photographs of cultural traditions, as appropriate. This further endorses the non-denominational nature of pre-school education.

The case for change states that the proposal is led, “in part by parental demand for local, accessible integrated pre-school education and the level of over-subscription in the nursery unit”. The case for change refers to communication from the Department of Education to the managing authorities, dated 31 October 2017, in which it is stated, “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 at grant-maintained and controlled integrated primary schools.” The CSSC welcomes the acknowledgement in the case for change that Portstewart Nursery Unit is also over-subscribed. The over-subscription of Mill Strand is attributed to a high level of demonstrated parental demand for integrated pre-school provision. Does this provide sufficiently robust and verifiable evidence? Can it be determined with confidence that over-subscription in Mill Strand Nursery Unit demonstrates parental demand for integrated education or is it possible that the over-subscription in Mill Strand and Portstewart Nursery Units demonstrates parental demand for a full time nursery place?

Conclusion

In summary, the CSSC endorses the value of pre-school education and notes that high quality pre-school education is available at all types of pre-school settings, both statutory (nursery schools or nursery units attached to primary schools) and non-statutory (voluntary or private providers). The CSSC recognises the role of the Education Authority, administered through the Pre-school Education Group, in planning pre-school provision based on an assessment of need, and notes the Education Authority's assurance regarding the level of existing provision.

The CSSC considers it critical in considering this proposal to acknowledge that pre-school education is not defined according to sectors and that all pre-school settings are considered accessible to children from all backgrounds. Excellent transition programmes exist within all pre-school settings and primary schools in the area to ensure all children experience a smooth transition from pre-school to primary school regardless of the setting from which they are transferring or the primary school within which they will be enrolled.

The CSSC acknowledges the Department's duty to encourage and facilitate the development of integrated education, however, this duty must be considered in conjunction with the duty to encourage, facilitate and promote shared education and the duty to avoid unreasonable public expenditure. The CSSC shares the concerns expressed by EA that the implementation of this proposal will result in increased costs for existing provision which is already in excess of demand. The overriding aims of the development proposal process are to facilitate meaningful and timely consultation with interested parties and to provide an opportunity for the DE to consider the full implications of a development proposal within the policy framework taking account of the views of interested parties. The implications of the statutory duties must be considered on a case by case basis, analysed and balanced alongside other relevant statutory requirements to reach a reasoned conclusion. If the duty to encourage and facilitate the development of integrated education trumps all others there would be no legal basis for the publication of a development proposal which seeks the views of others on the impact of the proposal.

On the basis of consultation with controlled schools, and an analysis of the case for change, the CSSC wishes to raise an objection in respect of development proposal 542 and would welcome the opportunity to discuss this response with the Department of Education.

Yours sincerely



Barry Mulholland
Chief Executive

Briefing note



Overview

This briefing note provides an overview of responses from the Controlled Schools' Support Council (CSSSC) to Development Proposals 542: Mill Strand Integrated Primary School and 543: Enniskillen Integrated Primary School

It was compiled for a meeting with Derek Baker, Permanent Secretary, 22 August 2018.

Summary of key issues

1. Concept of integrated preschool education

Previous Department of Education (DE) submissions relating to nursery provision have affirmed that pre-school provision is not defined according to sectors (eg integrated, controlled), and that all pre-school settings, regardless of location, are considered accessible to children from all backgrounds.

CSSSC strongly endorses the non-sectoral nature of pre-school education and the long history of cross community pre-school provision.

Whilst religious education and collective worship is a statutory requirement in grant aided schools, the legislation does not apply to nursery schools.

The curricular guidance for pre-school education (CCEA, 2018) is a requirement for all pre-school settings which are in receipt of funding from DE. The importance of ensuring equality of opportunity is clearly articulated within the guidance which states that children should be encouraged to understand that we see the world in many different ways depending on our cultural, social and religious viewpoints.

This further endorses the non-denominational nature of pre-school education.

In the context of a judicial review in respect of a development proposal relating to Drumragh Integrated College, Mr Justice Treacy defined integrated education as a standalone concept and indicated that a school which was constituted to serve one religious denomination over another with a 'partisan board' could not be assumed to be serving members of different religious groups equally.

He stated that “an integrated school strives to achieve an equal balance in relation to worship, celebration and exposure to both faiths. This is reflected in its constitution and the board must strive in its ethos to achieve this.”

The Board of Governors of a nursery school is composed of representatives for DE, the Education Authority (EA), parents and teachers. Unlike sectoral primary and post primary schools which have transferor or trustee representatives, nursery schools do not have a ‘partisan board’. Therefore stand-alone nursery schools can be classified as naturally integrated as they are not representative of one particular faith over another and educate children from all backgrounds as equals.

In the most recent DE submission relating to the establishment of a nursery unit at Oakwood Integrated Primary School comments included from the Education and Training Inspectorate appear to endorse the concept of integrated nursery provision, “The addition of the nursery unit would enable a greater number of children to access integrated pre-school education.” This is of great concern to Council.

2. Potential displacement of existing provision and potential for increase in underage children in nursery schools and units

Council believes that the fundamental consideration in respect of proposals to establish additional nursery provision is whether there is a demonstrated need in the area for an increase based on robust analysis of relevant data.

Where there is no apparent shortfall or projected shortfall in pre-school provision, development proposals for additional nursery provision in integrated schools have the potential to displace existing pre-school provision resulting in the potential for increased uptake of younger children into statutory nursery settings and consequently increase cost on public funds.

3. Parental demand for pre-school education at integrated primary schools

The DE submission for Oakwood Integrated Primary School indicated that the Department had received legal advice that the statutory duty to encourage and facilitate integrated education is applicable to pre-school education. It also stated that the Department had written to the statutory planning authorities reminding them of the need to support DE in the fulfilment of this duty, highlighting the role that the EA and the Pre-school Education Group (PEG) should play in striving to meet ‘demonstrated parental demand’ in an area for pre-school education at integrated primary schools.

The concept of meeting ‘demonstrated parental demand’ does not appear to be consistent with the Department’s duty under Article 44 of the 1986 Order to educate in accordance with the wishes of parents as far as it is compatible with the provision of effective teaching and learning and the avoidance of unreasonable public expenditure.

This duty does not equate to every parent securing provision within their preferred setting.

Council also 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. Council has asked if it can be determined with confidence that over-subscription for full time nursery places demonstrates parental demand for integrated education, or is it possible that the over-subscription demonstrates parental demand for a full time nursery place?

4. Effective and efficient use of public funds

Council has welcomed the assurance provided in previous DE submissions that the Article 64 statutory duty to encourage and facilitate the development of integrated education must be considered alongside the Department's duty under Article 44 of the Education and Libraries (NI) Order 1986 whereby pupils shall be educated in accordance with the wishes of their parents, and under Managing Public Money to ensure effective and efficient use of public funds.

In a context of significant pressure on public finances this consideration is paramount.

5. Impact on shared education/existing programmes

Under the Shared Education Act(2016), DE also has a duty to encourage, facilitate and promote shared education. Council believes that the duty to encourage and facilitate the development of integrated education must be considered in conjunction with the duty to encourage, facilitate and promote shared education.

Council has voiced concern that the establishment of additional nursery provision in integrated schools could threaten very successful and valued shared education programmes that currently exist.

About CSSC

The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the controlled sector in Northern Ireland.

The controlled sector is:

- Large - the largest education sector in Northern Ireland, accounting for 48% of all schools and teaching over 142,000 children.
- Diverse – the only sector to provide education across all school types – nursery, primary, secondary, grammar and special schools, plus controlled integrated and Irish medium
- Inclusive – providing education for children of all faiths and none (65% of pupils define as Protestant, 10% Catholic, 18% no religion and 7% 'other') and over a third of newcomer pupils in Northern Ireland

If you have any queries with regard this paper, please contact:

Jayne Millar, Head of Education Support, Email: Jayne.millar@csscni.org.uk Tel: 028 9531 3035

Note of Meeting with the Controlled Schools' Support Council (CSSC) DP 542 (Mill Strand IPS) and DP 543 (Enniskillen IPS)

Tuesday 22 August 2018

Permanent Secretary's Office, Rathgael House, Bangor

Attendees: Derek Baker, Permanent Secretary (DB)
Barry Mulholland, Chief Executive (BM)
Jayne Millar, CSSC
Sarah McCracken, CSSC
Cathy Galway, Director of Youth, Early Years & Childcare (CG)
[REDACTED], Early Years Team
[REDACTED], Area Planning Policy Team

In Attendance: Elaine Armstrong, Area Planning Policy Team

No.	Description	Action
1.	DB welcomed everyone to the meeting and outlined his role which, as the possible decision maker, meant he would not be expressing a view on these DPs in advance of seeing all of the evidence collated by officials. He also explained that legal advice on the authority of the Permanent Secretary to continue to take decisions on DPs is awaited.	
2.	BM stated that the Council appreciated this opportunity and tabled a briefing note setting out areas of concern in relation to these DPs.	
3.	Concept of integrated pre-school education – BM highlighted points made in the briefing note, in response to which CG explained that legal advice received by the Department clarified that the statutory duty requiring the Department to encourage and facilitate integrated education applies to pre-school education at school. CG explained that the term 'integrated' has a precise meaning defined in legislation, distinct from the concept of schools being 'naturally integrated' in terms of the religious balance of their enrolment. A consequence of the legal advice received is that the Department requires the support of the planning authorities in responding to evidence of parental demand for pre-school education places at Grant-Maintained Integrated (GMI) and Controlled Integrated primary schools. CG clarified that these are proposals for pre-school education	

No.	Description	Action
	provision at integrated settings as opposed to integrated pre-school provision.	
4.	<p>Displacement – To illustrate the general point made in the Council’s briefing paper, BM highlighted a DP for Forge IPS to create additional nursery provision when there is an existing controlled nursery which is ‘naturally integrated’, and JM highlighted that Enniskillen Nursery School will have a full class of underage pupils in 2018/19.</p> <p>CG explained that the admission of underage pupils to statutory settings is governed by legislation, and does not fall within the remit of the Pre-School Education Group (PEG), which is responsible for non-statutory pre-school provision, although numbers of underage children is a consideration for EA/PEG in determining non-statutory places required across NI. DB commented that displacement considerations feature routinely as part of the submissions produced by officials to inform decisions on pre-school DPs.</p>	
5.	<p>Parental demand for pre-school education at integrated primary schools – BM queried how parental demand can be demonstrated and how it can be established that demand is expressly for integrated provision, or whether it might instead be demand for full-time provision.</p> <p>CG explained that it is for the proposer to provide evidence of demand within the Case for Change and the quality of that evidence will be assessed by officials. The existing moratorium on new full-time pre-school education provision means that any proposals brought forward can only be considered for approval on the basis of part-time provision. JM stated that that full time places do exist within the system and Mill Strand is an example of this’</p>	
6.	<p>Effective and efficient use of public funds – BM queried how application of the Article 64 duty would be balanced against other duties, specifically the Article 44 duty with regard to the avoidance of unreasonable public expenditure.</p> <p>DB explained that consideration of all pertinent duties forms part of every DP submission that is prepared by officials, thereafter it is a judgement call for the decision maker.</p>	
7.	<p>Shared Education – BM commented on the Council’s view that established and valued Shared Education arrangements could be threatened by these DPs.</p>	

No.	Description	Action
	DB commented on the distinct nature of Shared Education arrangements between schools, and that the consideration of these DPs would take into account any evidence submitted that demonstrates how Shared Education arrangements could be impacted.	
8.	JM commented on levels of anxiety caused by these DPs which DB acknowledged. The meeting concluded with DB confirming that the briefing note tabled and a note of the discussion would form part of the submission prepared to inform decisions on both DPs.	Briefing Note to be included in submission

Letters of support

Re: 542

I am in support of millstrandintegrated primary school proposal for the following reasons
 1.:The Good Friday Agreement placed a responsibility on our politicians to support the growth of integrated education.

2 courts have already confirmed that 'Shared Education is not integrated education and that integrated education is a sector in its own right.'

3. Integrated education can only be provided in integrated schools.Mill Strand Integrated School & Nursery is the only integrated education provider at primary & nursery level in the area (Portrush, Portstewart & Coleraine).

4. is clear evidence of an established demand for the additional provision outlined in our Development proposals with over 50 applicants for 26 places this [year](#).

5. [It](#) is morally wrong to oppose the Development Proposals to deny parental choice for integrated education thereby forcing children into non-integrated schools against their wishes where they may be separated on the basis of religion at the age of four.

6. have a moral right to integrated education. There is funding available to allow Mill Strand IPS to provide it, funding through FSA. It is inconceivable that our Development Proposal would not be approved.The continuity and progression afforded by having a pre-school year within your child's primary setting facilitates a more co-ordinated approach to early years education including early intervention and positive learning outcomes. A pre-school year in an integrated setting enables children to foster positive attitudes within that ethos from the earliest possible age. The founders of Mill Strand Integrated School had to remortgage their homes to set up the school that our pupils benefit from today. This Development Proposal will secure the maximum investment and the future of the areas only integrated Primary & Nursery School for generations to come.With over half of the 50 applicants, applying for a place in September 2018, having a brother or sister already at the school, additional places are necessary to enable new families to avail of an integrated education

Thankyou for your consideration.

Dear Sir or Madam,

I'm writing in support of the development of Mill Strand to accommodate 23 additional places at pre-school level.

My daughter is one of those who have applied for the additional places. It is very important to me that my daughter experiences an integrated education. As there is no other primary school in the area offering an integrated education at this level, I applied for Mill Strand as first choice.

Due to the number of children who had siblings already at the school, my eldest child was not able to secure a place. It was very upsetting to find out new families, like ours, are being denied the experience of integrated education because of a lack of funds.

My family is an integrated one as my husband and I are from different religious backgrounds. We wish for our child to have a well rounded education which is not guided by a religious identity.

My husband and I don't want our child to have a narrowed experience of the people around her. We want her to meet and befriend people from all backgrounds, which is not something other schools in the area can provide.

We don't want her pigeon-holed for life as either Protestant or Catholic based on the schools she attends. Twenty years after leaving primary school, I'm required to state which school I attended on application forms in Northern Ireland for "equality" purposes. I'm very aware of how a choice at this level will reflect on my daughter for the rest of her life.

Surely if the government is committed to the Good Friday agreement, they should have by now established a wide enough range of integrated educational choices. Sadly this is not the case.

Please consider funding these additional places. Mill Strand is by far the best early years school in the area. They put children's experiences first. They work with the child to find what they excel at, rather than learning by rote. Their overall ethos reflects my own and I can't imagine my children being educated anywhere else.

Many thanks,

To whom it may concern,

I am writing in SUPPORT of the development proposal for an additional 26 funded places for nursery aged children at Mill Strand Integrated School Portrush.

Speaking as a father that already has our son enrolled very happily at Mill Strand it seems inconceivable that this proposal for extra places is not funded and cleared to go ahead.

If it does get objected and fails does that mean our younger daughter may be denied a place within the ONLY local integrated education nursery and primary school and potentially end up being separated from her brother within a school setting in the coming few years?

I certainly hope that wouldn't be the case, and it is the duty and responsibility of politicians, departments, and government to support the growth of integrated education in Northern Ireland.

By denying Mill Stand IPS the right to these extra places surely that contravenes any "growth" and goes against the moral rights of parents to be able to place their children within integrated education.

Regards,

Hi

I'm writing in support of Development Proposal 542 - for an additional 26 Nursery places to meet parental demand for an integrated start to a child's journey where they will not be separated from their peers at the age of 4 on the basis of their perceived religion.

- The Good Friday Agreement placed a responsibility on our politicians to support the growth of integrated education. The courts have already confirmed that 'Shared Education is not integrated education and that INTEGRATED EDUCATION is a sector in its own right.' Integrated education can only be provided in integrated schools.
- Mill Strand Integrated School & Nursery is the only integrated education provider at primary & nursery level in the area (Portrush, Portstewart & Coleraine).
- There is clear evidence of an established demand for the additional provision outlined in our Development proposals with over 50 applicants for 26 places this year.
- It is morally wrong to oppose the Development Proposals to deny parental choice for integrated education thereby forcing children into non-integrated schools against their wishes where they may be separated on the basis of religion at the age of four.
- You have a moral right to integrated education. There is funding available to allow Mill Strand IPS to provide it, funding through FSA. It is inconceivable that our Development Proposal would not be approved.
- The continuity and progression afforded by having a pre-school year within your child's primary setting facilitates a more co-ordinated approach to early years education including early intervention and positive learning outcomes.
- A pre-school year in an integrated setting enables children to foster positive attitudes within that ethos from the earliest possible age.
- The founders of Mill Strand Integrated School had to remortgage their homes to set up the school that our pupils benefit from today. This Development Proposal will secure the maximum investment and the future of the areas **only** integrated Primary & Nursery School for generations to come.
- With over half of the 50 applicants, applying for a place in September 2018, having a brother or sister already at the school, additional places are necessary to enable new families to avail of an integrated education.

Regards

To whom it may concern,

I am writing in response to the publication of Millstrand IPS and Nursery's recent Development plan no.542 seeking to establish an additional 26 nursery places.

I wholly support this development proposal as my son currently attends the pre school this academic year 2017-18. Had the school decided not to fund the pre school for another year

we would have been turned away and our first child denied access to an integrated pre school setting.

The school continues to grow in popularity as more and more parents want an integrated school for their children from the outset of their education.

I personally would not send my child anywhere but an integrated school and at present Millstrand IPS is the only integrated school serving the triangle area.

Parents have the right to send their child to an integrated nursery setting where they learn to value, respect and accept each others cultures and religions. I feel this is even more important for our children growing up in the world today.

If we want our children to grow up in a peaceful, respectful, inclusive and equal society the younger they are introduced to such concepts the better.

No child should be prevented from attending an integrated nursery school if it is their parent's wish.

Millstrand Ips nursery setting is currently oversubscribed each year by nearly double the applicants to places and is being filled by families already attending the school. It is vital that more places become available to ensure no family is turned away and that new families can become part of the Millstrand integrated community.

Yours sincerely,

To Whom it may concern,

I wish to support Mill Strand Integrated Primary & Nursery School with their proposal to increase the size of the Nursery to double in take each year. Some of the overall reasons are listed below.

My personal reasons are that I feel integrated education is the way forward for people in Northern Ireland to live in peace with each other. I live within a 5 minute walking distance to Kilmoyale Primary School, Ballybogey, but I would rather drive 15 minutes to Portrush and then a further 10 minutes on into work so my son can be educated in an integrated school with others who feel the same. My son attended nursery at Mill Strand and will continue here until secondary School. I choose integrated education as I don't want my child being surrounded in staunch religious views that have been thrust upon children from birth. Most of the other parents feel the same which is why there are so many of them that travel some distances to attend Mill Strand rather than the local religious school.

- The Good Friday Agreement placed a responsibility on our politicians to support the growth of integrated education. The courts have already confirmed that 'Shared Education is not integrated education and that *integrated education* is a sector in its own right.' Integrated education can only be provided in integrated schools.
- Mill Strand Integrated School & Nursery is the only integrated education provider at primary & nursery level in the area (Portrush, Portstewart & Coleraine).
- There is clear evidence of an established demand for the additional provision outlined in our Development proposals with over 50 applicants for 26 places this year.

- It is morally wrong to oppose the Development Proposals to deny parental choice for integrated education thereby forcing children into non-integrated schools against their wishes where they may be separated on the basis of religion at the age of four.
- You have a moral right to integrated education. There is funding available to allow Mill Strand IPS to provide it, funding through FSA. It is inconceivable that our Development Proposal would not be approved.
- The continuity and progression afforded by having a pre-school year within your child's primary setting facilitates a more co-ordinated approach to early years education including early intervention and positive learning outcomes.
- A pre-school year in an integrated setting enables children to foster positive attitudes within that ethos from the earliest possible age.
- The founders of Mill Strand Integrated School had to remortgage their homes to set up the school that our pupils benefit from today. This Development Proposal will secure the maximum investment and the future of the areas **only** integrated Primary & Nursery School for generations to come.
- With over half of the 50 applicants, applying for a place in September 2018, having a brother or sister already at the school, additional places are necessary to enable new families to avail of an integrated education.

Thanks

Letters of objection

Watt Fun Community Playgroup
Ballywatt Road
Coleraine
BT52 2LT

Date: 24th May 2018

The Area Planning Policy Team
Department of Education
Rathgael House
Balloo Road
Bangor
BT19 7PR

Email: dps@education-ni.gov.uk

Re: Development Proposal No 542
Mill Strand Integrated PS and NU.

Dear Sirs,

We refer to the Proposal submitted to you on behalf of Mill Strand Integrated PS & NU. We make this response to the proposal on behalf of the Committee of Watt Fun Community Playgroup at Ballywatt, Coleraine. We would ask that the points set out below be taken in to account.

1. We note reference to the integrated nature of the nursery provision on offer by Mill Strand. Please note, pre-school provision is not defined according to sectors and therefore all pre-school provision in this area is considered accessible to all children regardless of their background. In addition, there is a history of successful cross community pre-school provision in the area and an inclusive ethos within local schools including Shared Education.
2. The proposal submitted does not address the impact this increase would have on other providers within the area. There are sufficient places available within existing pre-schools to accommodate anticipated future requirements. To accede to a request for one establishment to double its intake without taking into account other establishments in the area is unnecessary and in fact reckless. We are firmly of the view that there is sufficient capacity in this area to cope with any anticipated additional demand and surely this should be availed of and found wanting before any additional places are allocated to one particular provider.
3. The proposed increase for Mill Strand would inevitably prejudice existing voluntary playgroups in the area.
4. The site upon which Mill Strand is located has traffic issues and access issues in terms of school drop offs and collections and access onto the main road. This will only be further exacerbated by an increase in numbers.
5. This proposal by Mill Strand has a huge potential to affect the ability of neighbouring providers to remain sustainable and therefore could seriously disadvantage children overall in the area.
6. Excellent transition programmes already exist within all statutory and voluntary preschool providers and primary schools, which ensure that children experience a smooth transition from preschool to primary school regardless of which preschool they are transferring from, or primary school that they are transferring to.

In light of all the points above, we firmly believe that this proposal should be rejected in its entirety.

Yours faithfully,

Secretary of Watt Fun Community Playgroup

St Patrick's PS Board of Governors
C/o St Patrick's Primary School
109b Causeway Street Portrush,
BT56 8JE
Tel/Fax: 028 7082 3578

12 June 2018

Regarding: Proposal 542 – Mill Strand Integrated Primary School and Nursery Unit

The Board of Governors object to this development proposal. There is sufficient provision of pre-school places within the Mill Strand Nursery Unit catchment area (Coleraine, Portstewart, Portrush and surrounding area, hereafter referred to as the Triangle Area) and the proposal would, if allowed, adversely impact on the continued viability of other quality pre-school/nursery providers within the Triangle Area.

The existing provision and mix of pre-school/nursery units provide: quality early year's education; an important range of choice for parents; and is in the best interest of the wider education provision in the Triangle Area.

This proposal would, if allowed, create a duplication of provision and represent an unacceptable inefficient use of public funds to the detriment of the education sector.

All those actually seeking pre-school provision within the Triangle Area can be accommodated as is demonstrated by the admission figures. We agree with the previous approach of the Education Authority (EA) in considering development proposal 484 which used actual demand and provision, rather than the modelled numbers. In this instance, and budgetary climate, resources should be directed to existing quality units that are providing for actual demands, rather than creating surplus on modelled figures.

The Board also consider that the existing provision of pre-school/nursery places is not a barrier to parental choice for integrated education at primary level. As stated with the development proposal Mill Stand Integrated Primary School (IPS) has entry criteria and capacity to welcome children from outside the on-site nursery unit. Therefore there is provision and capacity for children to attend non-sectoral preschool/nursery units in the Triangle Area and then progress into the integrated education system.

Referring to the submission provided by Mill Stand Nursery Unit, we would find that this presents a selective interpretation of statistical evidence and we disagree with the assertions made. Mill Strand Nursery and Mill Stand IPS clearly identify themselves as providers within the Triangle Area. The development proposal uses a selective data set which excludes Coleraine pre-school/nursery providers and is a misrepresentation of the context which Mill Strand IPS and Nursery Unit states it operates. We request that the Education Authority consider this development proposal within the context of provision of the Triangle Area.

We have noted the references to the sectoral/non-sectoral nature of pre-school provision. It is the policy position of the Department of Education that pre-school provision is non-sectoral. We do not consider that this development proposal is the correct forum or administrative process for arguments on this subject. Noting the policy position of the Department, it is not within the EA's remit to base decisions on these arguments. If the Department was minded to change its policy position, this would be subject to the necessary administrative and consultative processes. Therefore any argument relating to Mill Stand Nursery Unit being an integrated pre-school/nursery provider is of minor or no consideration. We would however like point out a misrepresentation of the evidence within the proposal documentation. Referring to the comment on Pg 21 – 'The table below shows that whilst there is definite mixing in the Mill Strand Integrated Nursery Unit, of the other settings, only Portrush Pre-school playgroup has Catholic and Protestant children in the same classroom'. This statement is inferred and demonstrates a bias interpretation of the evidence to support the argument. There are a number of pre-school units in the Triangle Area that have Protestant and Catholic children in the same class. This misrepresentation of the evidence does not reflect the dedication and hard work of our local pre-school/nursery providers to provide a high quality and inclusive early years environment for all.

Thank you for your consideration.

Yours sincerely
Andrew McGreevy
Chair, St Patrick's Board of Governors



Portrush Primary School

Crocknamack Road, Portrush, Co. Antrim BT56 8JW

Tel: 028 70 822 333

Fax: 028 70 825 497

Principal: Mr C. G. Guy B. Ed (Hons) P.Q.H.

29th May 2018

In response to Development Proposal 542

The Board of Governors are writing to you in response to the proposal listed above.

This proposal replaces previously submitted proposal 484 and has little, if any, significant change from the initial proposal.

The Board of Governors has had an opportunity to discuss the proposal at its meeting on 23rd January 2018. We would wish to bring your attention to the points outlined below and overleaf.

We note a number of flawed and tenuous arguments put forward in the case for change. Two of the most significant of these are:

- The school's own admission that they are a 'triangle' school serving the Coleraine, Portrush and Portstewart area. However, throughout the proposal, data is used that ignores this stance. Indeed, data is used within a two-mile radius, a three-mile radius and ignores all schools in the Coleraine area when examining data regarding preschool provision, and, secondly;
- The situation in this school has been allowed to progress unchecked by either EA or DENI to the extent that children have been placed in substandard accommodation with Health and Safety risks simply to allow the school to force a new build;
- The challenge to the view of preschool provision being non sectoral. This would set a precedent which would have far reaching implications throughout the country.

The simple principles of our objections are:

- There is sufficient existing capacity in the area in both Pre-school and Primary provision;
- The impact of increasing statutory nursery provision within the only school in Portrush which currently has such provision would be a further bias in a playing field that is already uneven and would be prejudicial to existing voluntary playgroups in Portrush and Portstewart;
- There is no sound evidence for increased demand for Integrated spaces;
- Enrolment trends have been inflated by external funding which has created additional places, in teacher led, preschool settings, for extended periods of time;
- Parents have been led down a path with no guarantees and with no regard for practicalities, timescales or resourcing;
- Area planning impact cannot be properly assessed when the school is claiming to operate within a wide area yet not secure in any location for its future development.

A more detailed response is included overleaf.

AREA PLANNING
AREA PLANNING
19 JUN 2018
16 JUL 2018
POLICY TEAM
POLICY TEAM

DESCRIPTION OF SCHOOL

- The school describes itself as having to operate “in inadequate, sub-standard accommodation” yet this goes against later claims of sound financial management;
- The school makes the claim that additional pre-school places were established “to meet parental demand for places at an integrated setting,” yet nowhere is this proven beyond demand for teacher led, preschool provision, already established throughout Northern Ireland. Mill Strand is the only school in the Portrush area to have access to nursery provision. This is in itself inequitable.
- The school makes a vague claim of trying to find a site within a 1.5-mile radius of the current site. As a ‘Triangle’ school, this insistence limits available sites. On the Easterly side of this radius only one site is available and this would place the school, with 14 classes and two nursery units (if approved) within a radius of no more than a few hundred yards of two existing schools with a capacity of 28 full classes and two already existing pre-school providers.
- Capacity of this capability would not be evident anywhere else in Northern Ireland within such a small area, even in more densely populated areas.
- They are already the only school in Portrush with Nursery provision and are now seeking to double this.

ENROLMENT

The Case for Change shows an increase in the combined pre-school and primary enrolments in 2015/16 and 2016/17. This is due to the additional pre-school places, a self-created demand which is a consequence of the financial sponsorship of an externally funded body to create additional teacher led Nursery provision outside the statutory planning framework.

- In 2015/16 the introduction of the pre-school unit caused a spike in numbers. This has followed through into 2016/17 with the continuation of the pre-school numbers and a temporary variation in the Primary 1 intake.
- This is a self-fulfilling demand caused by the intervention of external funding that has exacerbated existing health and safety issues on site and raised new concerns for child safety as identified by the Northern Health and Social Care Trust.
- The demand for teacher led, nursery provision has always been evident throughout Northern Ireland.
- All of these applications could have been accommodated through existing capacity within the triangle area.
- The Sustainable Schools Policy published on 14/01/2009 has an aim of sustaining, “strong, successful and viable schools...” The Governors believe that Portrush Primary School currently fits this description; however, the impact of this proposal would be significantly compromise the sustainability of our school;

Annex C (page 188) of the Response to DP 483 highlights that, “Population projections for three year olds in the Coleraine Council area predict a significant drop in population in the area, with a fall of over 30% between 2017 and 2039 (726 to 504).

- This is the only primary school in Portrush which has statutory Nursery provision. Furthermore, the provision is full time. It is equally feasible that what is demonstrated is a demand for Nursery provision or full time pre-school provision rather than Integrated provision;
- There is currently more than adequate space within the existing pre-school provision in the area, further increases in capacity are not necessary;

- The ETI report of February 2012 details enrolment figures for the years 2007 to 2012. Enrolment to both the Primary and Nursery level are static throughout the period. The figures show that the nursery unit was largely operating at or below capacity. The primary school was operating significantly below its approved enrolment number. Admissions into primary 1 during this period are below the Admission Number of 30.
- Further consideration of these numbers indicates that in three of the five years listed from 2007 to 2012 the full cohort of children from the nursery unit did not transfer to primary education within the school. This does not support the proposer's assertion that there is parental demand for integrated education. The historic drop off in pupil numbers between the nursery unit and primary 1 suggests that parents in the area favour teacher-led nursery education but this has not followed through with a consistent take up of integrated primary places. The assumption that this is based on a demand for integrated education is at best speculative;
- The provision of pre-school and nursery facilities are a proven way to maintain enrolment numbers within primary schools. The demand for teacher-led nursery education is recognised by Portrush Primary School and many other local primary schools. It is therefore unfortunate that restrictions on funding have meant that informal and formal requests to The Department to establish similar facilities at other schools in the area have consistently been refused.

The proposer seeks to demonstrate evidence of parental demand for integrated education. In recent years Mill Strand Integrated Primary School has utilised external funding to establish additional pre-school provision. Given the recognised parental preference for full time pre-school places it is therefore not surprising that this new provision has been taken up by parents. It is also not especially remarkable that parents express the wish that their children should move into primary education with a group of friends established within a pre-school environment. The funding utilised by Mill Strand IPS is not available to other schools. Therefore, it can be argued that the stated increase in numbers is not evidence of parental demand for integrated education but an artificial inflation of numbers caused by the availability of altruistic funding, rather than an emphatic move to integrated education.

- There is currently sufficient capacity within the existing preschool provision in the area, a further increase in capacity is not necessary. NISRA population projections for the Causeway Coast and Glens Council area over the period 2014-2039 show an 18.5% reduction in the 0-4 age group from a total of 8769 to 7144. Live births for Coleraine District Council also demonstrate a reduction in the last two years from 717 in 2013 to 693 in 2014 and 648 in 2015.
- Both proposals 483 and 484 make repeated reference as 'triangle school' and servicing all three towns, Portrush, Portstewart and Coleraine. However, the data provided to assess potential impact on other providers lists only those located within a three-mile radius. Given that the proposals exceed the capacity of the existing school site and do not confirm the location of a new site, the proposals must be seen within the context of Mill Strand being a 'triangle school' and likely to be located anywhere within that area.
- Therefore, statistics must reflect that entire area and the capacity available within the area for the evidence to be reliable. **(See Table 1 Below)**
- The EA Draft Area Plan for the primary sector detailed the primary school age projections for the Coleraine Council Area which indicated an estimated annual increase until 2013 followed by an estimated

yearly decrease up to 2025. It stated that taking into account cross border flows, the Coleraine Council area was facing a predicted decrease of 961 pupils between 2013 and 2025. The draft area plan anticipated that the level of unfulfilled places may increase to 2524 places, if the approved enrolment numbers within the Coleraine Council area schools remained steady.

	Year	No of 1st preference App	Total No of Applications	Total No Admitted	CAPACITY
STATUTORY					
Portstewart NS	2016/17	33	33	26	26
Mill Strand NU	2016/17	34	35	26	26
VOLUNTARY					
Mill Strand Playgroup	2016/17	15	21	20	UNKNOWN
Portrush Community Playgroup	2016/17	32	34	32	To be determined
Causeway Community Pre School	2016/17	15	15	15	To be determined
St Colum's Pre School Centre	2016/17	18	21	21	To be determined
Ballysally Nursery	2016/17				52
Castlerock Community Playgroup	2016/17				To be determined
Cuilrath Corner Nursery Unit	2016/17				26
Kylemore Nursery School	2016/17				104
Little Acorns Playgroup	2016/17				To be determined
Macosquin Community Playgroup	2016/17				To be determined
Millburn Community Pre School	2016/17				To be determined
Playhouse Activity Centre	2016/17				To be determined
St Malachy's Pre School Playgroup	2016/17				To be determined
Stepping Stones Crèche	2016/17				To be determined
Sunshine Playgroup	2016/17				To be determined
Irish Society's PS Nursery Unit	2016/17				52
Watt Fun Community Playgroup	2016/17				To be determined

HIGH QUALITY EDUCATIONAL PROVISION:

The evidence provided here is of a District Inspection, falling short of a sound, rigorous School Inspection, extracted from the ETI input into Development Proposal 484. We would highlight the following:

- The additional pre-school class/Nursery externally funded by Mill Strand School has never been inspected by ETI;
- The additional class operating out of Mill Strand is offering four hours of teacher led provision. This extended time will inevitably create a demand, however there is no evidence to support the assertion that it is a demand for integrated ethos;
- The new proposal chose to ignore the following extract:
"the ETI would have reservations in the following area:

- *additional pressure will be placed on the school's current building and given a proposal (DP483) to grow the size of the school, there will be issues around accommodation.*
- *In addition, the transition of a pre-school playgroup to becoming part of a larger nursery unit is likely to have associated increases in staffing costs, which the DE needs to satisfy it is content with. For example, a fully qualified nursery unit teacher may cost more than a pre-school playgroup leader.*
- *Furthermore, the DE would need to satisfy itself that the outworking would not create a disproportionately adverse impact on the neighbouring voluntary pre-school providers.*

The ETI would not have sufficient evidence to ascertain how the school would be able to sustain a notable increase in intake in going forward, nor do we have secure first-hand evidence to be able to comment on the likely impact on neighbouring educational providers.

The DE might need to satisfy itself that forward enrolment projections are accurate and that the research evidence provided by the school is secure. For example, page 9 of the proposal states, 'The estimated need in Table 56 of the Area Plan for the Coleraine Area greatly underestimates the future need for integrated places. Latest research indicates a need for 2500 places of which a minimum of 420 will be required by Mill Strand Integrated School, in addition to 52 Nursery places.'

The exact detail of the 'latest research' is not clear, nor is there a reference to explain how such 'need' was under-estimated. "

This information is as relevant to Proposal 542 as it was to 484.

Furthermore, the ascertain of 'high' quality education is stated simply as 'good' by the ETI. Again this is evidenced in their response to Development Proposal 484:

- Millstrand Primary School (including its nursery unit) was last inspected in February 2012 and the outcome was that overall effectiveness was good. The nursery unit was also evaluated as good.In the areas that the school was evaluated (leadership, quality of provision and achievement and standards) outcomes were good.....The overall effectiveness conclusion for the nursery unit was also good.

SOUND FINANCIAL POSITION

- The Board of Governors has no access to the Mill Strand School budget and are not in a position to comment on the financial position, the extent of external funding received by the school or how it has been used. The proposer describes a “*Sound Financial Position*” and an acceptable budget surplus where the senior management team and governors have successfully managed the financial position and physical resources. The school itself admits “*inadequate, sub-standard accommodation*”, and this is inconsistent with the assertion relating to successful management of physical resources.
- The positive impact of external funding cannot be underestimated at a time of significant cuts to the education budget. Similarly, the negative impact when this funding is ultimately removed must be considered. The proposal makes it clear that external funding has been used to create a teacher-led nursery facility that is not sustainable without continued financial intervention. The Department of Education has consistently been unable to provide the necessary resources to establish nursery provision with other primary schools in the area.
- The proposer also makes a claim that, “the school is one of the few in the area not having a deficit budget.” The Providing Pathways 2017-2020 document confirms that only 2 out of 80 Primary Schools in the Causeway Coast and Glen’s area (i.e. the Triangle Area that the school claims to serve) have a deficit in excess of the acceptable range of 5% or > £75,000.

ACCESS:

- The proposer states that the school is located within convenient transport distance for all its present pupils; however, it is also highlighted that the school serves the children of Portrush, Portstewart and Coleraine and the outlying areas. This also highlights Health and Safety Issues at the site which will be exacerbated by the increased pupil numbers whilst on the current site;
- The two existing Community Playgroups in the Royal Portrush Ward are situated in the top 26% of sites listed by deprivation and the Governors believe they provide a valuable service to children in these areas;
- The impact of cars on the safe operation of the site is extremely relevant. This issue has been highlighted on numerous occasions by the school’s management through various press releases and social media campaigns. It is also identified by the ETI report of 2012;
- The proposal also mentions health and safety issues relating to access from the main road. Any expansion of numbers at this site clearly has to be considered against a detailed assessment of the junction capacity onto the main Portrush Portstewart Road and the availability of third party lands to create right turn lanes, visibility splays and the like.
- The proposal details issues relating to access, drop off/pick up arrangements, and Northern Health and Social Care Trust concerns. It would therefore appear that the management of the school has allowed this situation to arise in an un-planned way and has allowed an un-safe environment to develop.
- It is therefore evident that a problem exists that can only be exacerbated by increased numbers. It is also evident that any solution to this problem may be beyond the school’s control and the proposal makes no suggestion as to how these problems can be resolved. Indeed, in spite of these concerns, the

school continues to drive up numbers in the absence of any published timescales to develop the school facility to cope with this capacity.

STRONG LINKS WITH THE COMMUNITY:

- The proposer claims that Mill Strand is the only school in the wider Triangle area hosting services in all three main churches (Catholic sacraments, Presbyterian & Church of Ireland.) The Catholic Church hosts the sacraments, and children from Portrush Primary School attend these as do many children from other schools. Schools in the Triangle area have a long history of embracing diversity;
- The quote on page 12 inaccurately makes the claim, "As evidenced by ETI 2012 Mill Strand Integrated PS has exceptionally strong links with the local community and is widely recognised as 'a school in the heart of the community, catering for the whole' This is not quoted anywhere in the ETI report of 2012. The report simply states that the "school and nursery unit have established good links with the parents and wider community community'.....very good quality of links and partnerships established with the local and wider community."

AREA PLANNING IMPACT:

The claim is made that, "Mill Strand IPS is the only integrated primary school and pre-school provision in the Coleraine, Portrush, Portstewart 'Triangle' area." Again this highlights the fact that all consideration of data and figures regarding places **MUST** encompass this area. Only 54% of intake is comprised from Portrush area, therefore wider implications must be considered.

Area planning cannot adequately be considered when a new site is to be identified for Mill Strand Primary School and Nursery Unit and the location of such has not yet been identified. Impact from an area learning perspective cannot be reasonably considered in this situation.

- The proposer references "parental demand for Integrated Pre-School Education" yet no evidence is presented to substantiate this statement and we contest that the demand is for free, teacher led, significant provision.
- Table Four highlights the preschool experience of children entering P1 in Mill Strand, almost exclusively from attendance in their own preschool whether it be the nursery or the playgroup. Does this not highlight that rather than the intake being cross community it is coming from its own exclusive community?
- These figures do not show how many parents had applied for funded preschool places elsewhere but withdrew their application for a place when additional Mill Strand places became available with additional places and teacher led provision after the application dates had closed;
- Preschool demand is being met within the local area-the belief that the planning figure is not being met is a figure which does not take account of the demographic downturn predicted for the triangle area. The submission itself supports this by quoting DP No 484 (Pt 147) where EA highlight that every child got a funded preschool place.
- The submission believes it is important to note that nine children in the 2016/17 year did not arrive in P1 with any preschool experience. Unless reasons are given, no assumptions can be made as to why this was.

RELIGIOUS BALANCE OF PRE-SCHOOL SETTINGS IN PORTRUSH AND SURROUNDING AREAS:

The Proposal makes an assumption about their integrated provision representing all communities attending, listing their own figures and that of four others.

- Of the other four, they concede that Portrush Community Playgroup, the clue being in the name, also has Protestant and Catholic intake;

- Of the four other groups, two of the four do not have data listed or available so assumptions cannot be made;
- Portstewart Nursery Unit may not have Catholic numbers listed but has a majority of children identified as 'other,' a growing trend in many places, including the evidence from their own enrolment (Table 9) which now shows 'other' as the most significant grouping;

We have long been told that the 'Integrated' School system is about so much more than Protestant and Catholic, yet the use of this data is crude and seems to be harping back to a past and a time that the local area has moved on from.

The NICIE challenge to the assertion of pre-school provision being non-sectoral is something which would have huge repercussions and is an entirely separate issue and not one that should be used in this context to try and create a precedent.

RATIONALE FOR PROPOSAL:

In DP 484 the main reason for change is to assist the school in reducing the bureaucratic burden associated with managing and governing pre-school provision under two separate funding and governance mechanisms. DP 542 shifts this to being led in part by the parents of children Mill Strand IPS wanting local, accessible integrated pre-school education for their children as well as meeting the plans of area based education. The school is merely seeking to achieve the same goal with different reasons, trying to tick boxes and has not substantially changed anything to affect the same decision as applied to DP 484.

The proposer makes reference to the Department's statutory duty in respect of Integrated Education.

'... to encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils.' Article 64 of the Education Reform (NI) Order 1989;

- The data presented clearly highlights that the largest body of children present in the school are listed as 'Other,' neither Protestant nor Catholic;
- The legislation does not suggest that the duty conferred on the Department is fulfilled with no regard to the potential impact on other schools.

This duty must also be considered alongside the duty under Article 44 of the Education and Libraries (NI) 1986 Order, that is, that the Department, *"shall have regard to the general principle that, so far as it is compatible with the provision of efficient instruction and training and the avoidance of unreasonable expenditure, pupils shall be educated in accordance with the wishes of parents."*

- The Governors of Portrush Primary School strongly believe that the creation of additional statutory preschool provision in the Portrush/Portstewart/Coleraine area, which already has sufficient capacity, is unreasonable public expenditure and has the potential to threaten the sustainability of long established voluntary community playgroups in the area;
- The proposer highlights concerns that the Northern Health and Social Care Trust has however these are not detailed in the case for change. It is noted that the concerns led to the exclusion of playgroup children from the rest of school suggesting that significant concerns were raised;

The proposer claims their provision is "heavily oversubscribed"

- However, the enrolment statistics provided do not support this. Only one of the three years has been oversubscribed on first preference applications. (Table 3 from 542)

	Year	No of 1 st Pref Applications	Total No of Applications	Total No Admitted
Mill Strand IPS Playgroup	2017/18	23	27	23 (all correct age)
	2016/17	15	21	20 (inc 3 u/a)
	2015/16	17	17	+1

The proposers cite the desirability of educating children from all backgrounds together- Community Playgroups already achieve this. All pre-school funded education is on a cross community basis. No regard is given to the Controlled sector that has never turned away any child based on religion etc. **AGAIN, The NICIE challenge to the assertion of pre-school provision being non-sectoral is something which would have huge repercussions and is an entirely separate issue and not one that should be used in this context to try and create a precedent.**

- The proposer claims to have highly sought after pre-school provision: This is a reflection of the historic development of pre-school provision in the area which has created inequality across the sectors which will be further exacerbated if this proposal is approved.
- **EQUALITY** must be raised here as a substantial issue. Mill Strand is the only school with an attached, fully involved pre-school provision; they cannot be allowed to further double their access to this while all other schools have no access to this and historically have been told not to even bother applying;
- Before their Nursery provision could be doubled, all other schools should receive the same facility;
- There is no such thing as a 'feeder' playgroup as they claim;
- The Sustainable Schools Policy promotes better links to Early Years Provision. Doubling Nursery intake at Mill Strand Integrated Primary School would have a significantly detrimental effect on other pre-school providers in the area, in particular the Department of Education funded voluntary providers within the town and outlying areas of Portrush. This will threaten and potentially erode the strong links that Portrush Primary School has already established.

NEED FOR ADDITIONAL PRE-SCHOOL PROVISION AND IMPACT ON OTHER PRE SCHOOL PROVIDERS:

This need has not changed since the previous submission and was more than adequately dealt with in previous responses.

- The EA PEG Group view was such that there is a sufficiency of pre-school provision in the area to meet demand;
- ETI have highlighted that "DE would need to satisfy itself that the outworking would not create a disproportionately adverse impact on the neighbouring voluntary pre-school providers.
- Again, the figures used are within a two-mile radius, curious when this is a 'triangle' school;
- Again they assert that there is no alternative for parents seeking an integrated education, however no pre-school provision is defined according to sectors so all pre-school settings, regardless of location. Are considered accessible to children from all backgrounds;
- Figures provided do not give any analysis of live births or population projections;
- The CSSC and ETI both highlight the potential impact on neighbouring pre-school providers if approved;
- There were no temporary flexibility requests in the area approved for 2014/15, 2015/16 or 2016/17;
- A temporary flexibility request submitted by Mill Strand IPS Nursery Unit was turned down by DE on 5 May 2017 as sufficient places were available in the area to meet the demand for pre-school education provision;
- Demographic trends for the pre-school population are exhibiting a downwards pattern;

- EA has advised that only 120 first preference applications were received for some 130 funded pre-school education places in the area

The Board of Governors of Portrush Primary School strongly believe that the impact of this proposal on other schools cannot be properly assessed as Mill Strand Primary School, which draws pupils from three towns and the surrounding area, does not have a site secured for the proposal to be facilitated. Schools which may be impacted by this proposal do not know the future location for Mill Strand Integrated Primary School and Nursery Unit.

The Case for Change states that the approval of the proposal “would have no impact on existing schools in the area as all are fully subscribed.” The Board of Governors strongly disagree with this assertion.

It is the Department of Education’s practice not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting. These additional spaces would have a detrimental effect on other pre-school providers in the area, and result in them not filling their capacity.

In rejecting DP 298 from St Columb’s PS (Portstewart) DENI stated “There is no criteria in place whereby it would be appropriate to cease funding an existing PSEP funded playgroup to establish nursery provision in its place.” This surely is a precedent set?

4 EDUCATIONAL IMPACT

The school wishes to extend their capacity to 52 Nursery places to extend the availability of high quality pre-school provision and outstanding progress of the pupils in the Foundation Stage. There is nothing in the ETI report of 2012 to highlight the progress in the foundation stage as ‘outstanding’.

They highlight an essential part of integrated education being social and friendship bonds that cross divides of cultural, religious, national or social boundaries.....yet the data used focuses on Protestant and Catholics?

They believe that outcomes for children with Nursery units are higher than those within playgroups, yet the three other schools in the two-mile radius have neither Nursery units of their own or ‘feeder’ playgroups, yet MSIPS wish to double their allocation of such ‘high quality’ provision?

The Educational benefits listed are anecdotal at best and provide little, if any substance. The benefits listed from this proposal could be found in any primary school in the country.

The Equality of Opportunity argument put forward highlights nine pupils who did not avail of pre-school places but does not give the reasons-these could be many and varied?

RESOURCE IMPLICATIONS

- Mill Strand Integrated Primary School was included in an announcement made on 23 March 2016 as one of a number of Integrated school proposals which would “advance to planning” as a result of the first allocation of funding following the Fresh Start Agreement.
- No further information is available to the Governors of Portrush Primary School at this stage regarding the availability of this funding or the planning status of the proposals for Mill Strand Integrated Primary School, including the timescales and the procurement of a site for a new school building.
- The procurement procedures and building timescales would not allow for a school to grow at the rate forecast and be able to deliver the accommodation it would require to increase nursery provision;


In conclusion, the Governors of Portrush Primary School believe that the statutory duty to encourage and facilitate the development of Integrated Education does not equate to a duty to grant every proposal for expansion brought forward on behalf of an Integrated school and that the Department of Education must

be mindful of its statutory duty under Article 44 of the Education and Libraries (NI) Order 1986 to ensure effective and efficient use of public funds.

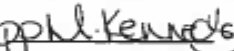
The Governors affirm their opinion that the creation of additional spaces in the Portrush/Portstewart/Coleraine area, which has sufficient existing capacity, is unreasonable public expenditure.

The Ministerial Statement of 17th October 2016, in regard to the Draft Strategic Area Plan, states, *"Regardless of which sector a pupil is enrolled in-all pupils deserve equality of access to high quality education. The educational experience of our children and young people is greatly enhanced when they attend schools that are educationally and financially viable."* If this Development Proposal is allowed to progress, this equality will be further eroded against children choosing to attend the local Controlled or Maintained schools as they cannot access teacher led, Nursery education. Two schools in Portrush that currently do not have composite classes, are likely to end up with composites throughout their school, leaving three schools in a town of four schools with composite classes, creating a situation in stark opposition to the Minister's stated position that, *"ideally they should be in single year group classes."*

The Minister goes on to ask us to engage with our constituents to help them understand what is needed and why it is needed. There is nothing in this Development Proposal 542 significantly different to the previous Development Proposal 484 which would be explainable to our community or that we could support. On reflection of the Justice Treacy ruling of 2014, it is perhaps prudent to flip the words of a former Minister to now emphasise that Integrated Education is not the only show in town. Indeed, the Shared Education Act (Northern Ireland) 2016 makes this clear.

Signed:  A. Irwin (Chair of Governors)

29th May 2018

Signed:  P.H. Kennedy (Principal)

29th May 2018

Carnalridge Primary School

135 Atlantic Road, Portrush,
Co Antrim, Northern Ireland,
BT 56 8PB

Telephone: 028 70822686
Facsimile: 028 70823610
Email: kelliott559@ic2kml.net
Web: www.carnalridge.org
Principal: Mr K. Elliott BEd(Hons) PGCEM PGCCE PQH
Saturday, 16 June 2018



Development Officer
Education Authority
Operations and Estates
Ballee Centre
Ballee Road West
Ballymena
BT42 2HS

Dear Sir / Madam

Development Proposal No 542 – Mill Strand Integrated Primary School & Nursery Unit

Carnalridge Primary School Board of Governors wish to raise an objection to Development Proposals 542 on the following basis:

- Currently there is over provision in nursery places in the triangle area
- Pre-school provision is cross community
- There would be subsequent detrimental impact on the sustainability of neighbouring settings
- Existing MIPS site provides inadequate access, collection areas, parking etc
- MIPS new site has not been identified
- MIPS does not participate in shared education with other settings in the triangle area.

Yours sincerely

Mr A Bingham, Chairman of the Board of Governors

Department of Education (Policy Team) Comments

A	Financial Monitoring Team
B	School Admissions Team
C	Education Workforce Directorate
D	Investment and Infrastructure Directorate
E	Early Years Team
F	Shared Education and Community Relations Team
G	Inclusion and Wellbeing Directorate
H	Irish-medium and Integrated Education Team
I	Equality Unit

A Financial Monitoring Team**306-6544 Mill Strand Integrated Primary**

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 £820,797 in the 2018-19 financial year for 274 FTE pupils (248 primary & 26 full-time nursery class pupils). This generates a per capita of £2,996* which compares to an average for all primary schools of £2,978. Details of budget allocation in 2018-19 to the school shown in the table below.

** the school's delegated budget included £55,446 for Landlord Maintenance and Administrative costs factor funding, 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 2017).

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).

306-6544**Mill Strand Integrated Primary**

GMI Primary School

School Profile**2018-19 Funding Formula (Nursery & Primary Schools)**

Nursery School - Full Time	
Nursery School - Part-Time	
Nursery Class - Full Time	26
Nursery Class - Part-Time	

Primary - Reception	
Primary - Year 1	52
Primary - Year 2	52
Primary - Year 3	30
Primary - Year 4	32
Primary - Year 5	29
Primary - Year 6	30
Primary - Year 7	23
Primary - Special Unit Years 1-7	
Sub-total Primary Pupils	248

Total Pupil AWPU's	302.94
--------------------	---------------

Floor Area - Sqm	1,582.00
------------------	-----------------

Number of Teachers	11.00
Total Annual Salary Bill	£525,762
Average Salary for School	£47,797
Average Salary for Phase	£51,167

Total Service Personnel Pupils	
Total Traveller Children	
Total Looked After Children	
Total Newcomer Pupils	10

Total IM Unit Pupils	
----------------------	--

--	--

Total Pupils	274
Total FTE Pupils	274.00

Total Free School Meals	70
Total FSM %	28.23%
Free School Meals <u>Band</u>	1

Total IM Unit P1 & P2 Pupils	
Total P1& P2 Pupils excluding IMU	104

Total Primary Special Units	
-----------------------------	--

Total FTE JSA's	10.00
Total FTE JSA's %	38.46%
JSA/IS <u>Band</u>	2

Formula Funding Allocations 2018-19

Pupil AWPU	£605,302
TSN - Social Deprivation	£49,841
Social Deprivation - Add. Funding	£2,643
Premises Area	£13,631
Premises FTE	£22,985
Primary Small Schools Funding	£11,748
Teachers Salary Protection	
Primary Principals' Release Time	£4,269
Foundation Stage - School	£44,942

IM - Curricular Support	
IM Unit - Admin. Support	
Service Personnel Pupils	
Traveller Children	
Looked After Children	
Newcomer Pupils	£9,990
Landlord Maintenance	£20,566
Administrative Costs	£34,880

Foundation Stage - IM Unit		Special Units	
----------------------------	--	---------------	--

Total Formula Allocation for 2018-19	£820,797
---	-----------------

Total Transitional Funding	£0
----------------------------	----

Total Funding Allocation for 2018-19	£820,797	Per Capita	£2,996
---	-----------------	-------------------	---------------

2018-19 Average Per Capita for :	Primary School	£2,978
---	-----------------------	---------------

Funding Authority:	GMI
School Type:	GMIP
School Location Type :	Urban
Irish-medium Type:	

Parliamentary Constituency:	East Londonderry
District Council:	Causeway Coast and Glens
Ward:	Atlantic

B School Admissions Team

Development Proposal 483 was approved on 10 July 2017 to increase in the approved admissions number at Mill Strand Integrated PS from 30 to 58 and the enrolment number from 232 up to 406, commencing in September 2018, or as soon as possible thereafter. The increased admissions number has been implemented and the enrolment number is in the process of being phased up to 406.

Temporary Variations

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

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

It should be noted that a TV is granted on the condition that no additional accommodation will be involved. TVs are not granted to address anticipation of demand, nor a long term desire to increase the size of a school within an area. In the last five years Mill Strand Integrated PS has had TVs approved as follows:

School Year	Approved Admissions Number	Approved Enrolment Number	Temporary Variations	
			Approved (To total of)*	
			Admissions	Enrolment
2018/19	58	260	-	-
2017/18	30	232	51	239
2016/17	30	232	53	-
2015/16	30	232	-	-
2014/15	30	232	34	-

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

C Education Workforce Directorate

TITLE & Proposal	DP 542 – Mill Strand IPS and NU, Portrush – Establish a new Nursery Unit (26 p/t places) with effect from 1 September 2018, or as soon as possible thereafter.
Ref Number:	DP 542
Education Authority Recommendation:	<p>The proposal is being taken forward by the School Board of Governors, and is in accordance with the Education Authority Strategic Area Plan and Annual Action Plan 2017/18.</p> <p>The Education Authority is concerned that the implementation of this proposal will result in increased costs for the existing provision which is already in excess of demand.</p> <p>There is the potential for displacement of existing funded pre-school provision in the area, as currently there is spare capacity.</p>

EWD has reviewed the Case for Change and noted that the school has advised that, “as there is already a facility in place for pre-school children, no additional resources will be required. Existing teaching and non-teaching staff would be retained on temporary contracts pending the advertisement and appointment of permanent staff at a time conducive to the operation of the new nursery setting within the 2018/19 academic year.

Assurance should be sought from the EA that any potential impact on terms and conditions of teaching staff are managed in accordance with:-

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

D Investment and Infrastructure Directorate

Input Provided by IID

Mill Strand Integrated Primary School

Proposal

Mill strand IPS wishes to establish an Additional 26 part time place nursery places with effect from 1 September 2018, or as soon as possible thereafter.

Current Position

Mill Strand Integrated Primary School (IPS) is an integrated primary school which was established in 1987 by a group of parents seeking integrated education for their children. The school serves the children of Portrush, Portstewart, Coleraine and surrounding area as the only integrated primary provider in the area. It is a grant maintained integrated co-educational primary school situated at Dhu Varren, Portrush. Mill Strand IPS currently has an approved enrolment for 2018 of 260 pupils.

The final “A Fresh Start – Stormont Agreement and Implementation Plan” which was published in November 2015 included provision of a contribution of up to £500 million over a ten year period of new capital funding to support shared and integrated education subject to individual projects being agreed between the Executive and the UK Government. A major capital investment project to improve/replace the accommodation at Mill Strand Integrated Primary School, Portrush was one of the projects included to be taken forward in planning in March 2016. The current estimated construction costs are £4.25M with an estimated 15 Month Construction period once the Business Case and Statutory approvals are received.

Costs and Timescales

The Department proposes to build a 14 class base school and single nursery unit, the new-build school is currently being designed for Mill Strand IPS under the Fresh Start programme. The project currently allows for a nursery unit but can be designed in such a way to ensure a double nursery unit can be included if the DP is approved. In the event the DP is approved, the additional nursery unit could be incorporated into the new-build school project and subject to the availability of budget cover and the necessary approvals the Department will consider meeting the additional cost from within DE’s Capital Budget. It is anticipated the additional costs to upgrade the scheme to a double nursery are in the region of £200k

Timing can be reviewed should the DP be approved.

E Early Years Team

INPUT FROM EARLY YEARS TEAM ON DEVELOPMENT PROPOSAL No 542

ESTABLISHMENT OF ADDITIONAL 26 PART-TIME NURSERY PLACES AT MILL STRAND INTEGRATED PRIMARY SCHOOL WITH EFFECT FROM 1 SEPTEMBER 2018 OR AS SOON AS POSSIBLE THEREAFTER

- 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**

1. INTRODUCTION

At the request of the Board of Governors of Mill Strand Integrated Primary School, the Education Authority (EA) has published Development Proposal Number 542 proposing an additional 26-place part-time nursery unit be established at the grant maintained integrated primary school, from 1 September 2018 or as soon as possible thereafter.

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

Since 2015 a non-PSEP playgroup session has also been provided at the school using funding provided by the Integrated Education Fund (IEF). The Case for Change (CfC) advises that the school is currently registered to provide 23 places during this session and 23 children of PSEP target age are in attendance. It advises that this session has been provided by the school to meet demand from parents for pre-school education provision of an integrated management type and it would be closed if the development proposal were approved. The school's website indicates that this is full time and is run during the same times as the school's existing full time nursery class.

The CfC did not indicate the length of the session, nor provide details of whether the children attending the session had applied for a DE-funded pre-school education place. The Department sought this additional information in order to aid its consideration of the proposal, and this is recorded below as appropriate.

2. BACKGROUND

A previous Development Proposal (DP 484) requesting additional nursery provision at the setting was not approved in 2017. The CfC for the current Development Proposal seeks the same additional nursery provision as previously requested, that is, 26 additional part time pre-school education places. The current proposal has been considered against the current context, and so reflects changes and updated information since the previous DP, including changes to the pattern of pre-school applications and the level of provision in the area.

The CfC states that the main reason for the proposal is to address the preference of parents in the area for access to local pre-school education of an integrated management type. It states that the Board of Governors introduced the non-PSEP session to meet the high level of parental demand demonstrated by the level of over-subscription for the school's nursery unit. The CfC states that the non-PSEP session is intended to be a short term measure, but points to its popularity as evidence of the demand for additional pre-school education places in a setting with an integrated management type. The CfC proposes that the new additional 26 place part-time statutory pre-school education provision, if approved, would be housed in the accommodation that the non-PSEP session currently operates in and that that session would cease.

The CfC states that other reasons for the proposed change include reducing the bureaucratic burden in operating pre-school education provision under two separate funding and governance mechanisms, providing equality of access to support and other services for vulnerable children, increasing access to education of an integrated management type and enabling the setting to operate under a single management system.

The CFC states that the school is currently developing plans for a new build site in the Portrush area in conjunction with DE and that it is anticipated that this work will be completed for the start of the 2021/22 academic year, and would include the additional nursery class, if approved.

Relevant Policies, Practices and Duties

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

<p>The aim of the Pre-school Education Programme is to provide a funded pre-school education place for every target age child whose family want it.</p>	<p>The CfC focuses on a parental preference for pre-school education places with an integrated management type, rather than unmet demand for pre-school education provision generally. The EA has advised of increasing demand for pre-school education provision in the area. This is considered in more detail below. Available figures on future demographics in the area suggest there may be a reduction in pre-school population in the longer term.</p>
<p>Learning to Learn – A Framework for Early Years Education and Learning.</p>	<p>Published on 7 October 2013, among its key actions is a moratorium on any new or additional full-time pre-school education provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it. This proposal is in line with the current moratorium.</p>
<p>Encourage and facilitate the development of integrated education.</p>	<p>Under Article 64 of the Education Reform (NI) Order 1989 (integrated education), the Department of Education (DE) has a statutory duty to 'encourage and facilitate the development of integrated education, that is to say the education of Protestant and Roman Catholic pupils'. This duty is considered in more detail below.</p>
<p>Displacement of good quality pre-school education provision already in existence.</p>	<p>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 education 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.</p>
<p>Ensuring the best use of public resources</p>	<p>In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it. In light of this, it aims to fill available pre-school education provision as far as possible with target age children, avoiding over provision and the resulting enrolment of children under 3 years and 2 months (underage children) in statutory settings. This is considered in more detail below.</p>
<p>Reception Provision</p>	<p>A key action under the Learning to Learn framework is the removal of reception provision. Mill Strand IPS does not have reception provision and there is no longer any reception provision within a five mile radius.</p>

2. 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 demand for pre-school education provision in the area.

The numbers 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.

As the playgroup session at Mill Strand IPS is not PSEP provision, it is not included in the tables below, either before or after the proposed change, but it is taken into account in the analysis later in this document.

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

Level of Pre-school Education Provision - two mile radius of Mill Strand Integrated Primary School

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	26	44	0	70	110	63.6%	0
2017/18	26	32	0	58	102	56.9%	0
2018/19	26	47	0	73	103	70.9%	0
Proposed	52	47	--	99	103	96.1%	--

Based on the 2018/19 provisional data the level of provision within the two mile radius is currently significantly lower than the planning figure. However, if the proposed statutory provision were made available this would increase to 96.1% which is only just above the planning figure. This would suggest that pre-school education in the area may be insufficient to meet demand. The EA has advised that in both 2016/17 and 2017/18 , there was one child who remained unplaced at Stage One; no further preferences were received at Stage Two therefore both children remained unplaced. No children were unplaced in the area at the end of the 2018/19 admissions process.

The EA has further advised that there is increased current demand for pre-school places in the area and advises also that existing non-statutory providers have capacity to increase intake to meet this pressure. In addition, NISRA statistics show that there may be a reduction in pre-school population in the longer term (see Annex C).

The playgroup session at Mill Strand IPS is not reflected in the table above. The CfC states that this session is attended by 23 PSEP target age children who do not avail of a PSEP place. This suggests that there may be an additional element of demand for pre-school education provision in the area that is not reflected in the figures above, and is not currently met by the PSEP.

Level of Provision – five mile radius of Mill Strand Integrated Primary School

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	234	170	0	404	465	86.9%	23
2017/18	234	156	0	390	424	92.0%	21
2018/19	234	198	0	432	408	105.8%	23
Proposed	260	198	--	458	408	112.2%	--

Based on the 2018/19 provisional data the level of provision within the five mile radius is above the planning figure. If approved, the additional statutory provision would bring the level in the five mile radius to 112%. This would suggest that sufficient pre-school education is already in place to meet demand in the wider area. The numbers of underage children accessing pre-school education places in the five mile radius would support this assumption. It is noted that all the underage children are enrolled at the same setting, located at the limit of the five mile radius.

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

3. 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 1986 Order (...have regard to the general principle that, so far as is compatible with the provision of efficient instruction and training and the avoidance of unreasonable public expenditure, pupils shall be educated in accordance with the wishes of their parents). It is important that the Department strives to meet demonstrated parental preference in an area for pre-school education at grant-maintained and controlled integrated primary schools. In discharging these duties it is essential that the Department does not inadvertently constrain the development of integrated education.

All funded pre-school education settings regardless of location and management type are accessible to children from all backgrounds and are subject to the same inspection standards. All pre-school education settings follow the same curricular guidance, the broad framework of which ensures equality of opportunity, pointing to staff acknowledging and respecting the culture, beliefs and lifestyles of the families of all children. However, it is acknowledged that parents state preferences for pre-school education provision taking into account a wide range of factors, and in some cases parents may have a preference for pre-school education in schools with a particular management type, including an integrated management type. This is taken into account in the 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 integrated primary schools within a 10 mile radius of Mill Strand IPS.

The closest provider is Ballymoney Controlled IPS which is over 12 miles away. If this proposal were approved it is not expected that it would have any impact on provision at Ballymoney Controlled IPS.

The CfC sets out that the nursery unit at Mill Strand IPS has been oversubscribed in each of the last six years, by up to 23 applications (see table below). This suggests that parents in the area may have a preference for pre-school education provision with an integrated management type. The CfC provides further indications of this parental preference, as it advises that all unsuccessful applicants to the statutory pre-school education setting at Mill Strand IPS chose to enrol in the non-PSEP playgroup session rather than avail of PSEP funded education provision in a non-integrated management type setting elsewhere.

Year	First preference application	Total admitted
2012/13	31	26
2013/14	44	28
2014/15	23	26
2015/16	43	29
2016/17	38	26
2017/18	49	26
2018/19	53	26

Source: CfC

Correspondence received by the Department in regard to the proposed provision queried whether the oversubscription of pre-school education places at Mill Strand IPS could properly be attributed to parental preference for pre-school education with an integrated management type, suggesting that it could, instead, demonstrate a preference for full-time pre-school education provision. It is possible that parents choose the setting for a number of reasons, including, but not limited to, the fact that it offers full time provision and that it has an integrated management type.

The school's website advises parents that:

"It is the intention of the school to honour its commitment to provide fully funded places for all correct age, first choice applicants submitted by 12 noon on Wednesday 12 January 2018. In doing so the school has submitted a Development Proposal for 26 Additional Nursery places for September 2018.... In the event that our new Development Proposal is unsuccessful, the IEF has agreed to support the Board of Governors in maintaining pre-school provision at Mill Strand Integrated School in 2018-19 so that parental demand is realised."

Given this information, it would be reasonable for parents to assume, when considering applying for a pre-school education place at Mill Strand NU that at least 49 pre-school education places (the number of applications made for 2017/18) will be made available for September 2018, regardless of the outcome of the DP process.

The table below shows the application rates for full-time pre-school education provision within the five mile radius for the 2018/19 academic year. When the playgroup session is taken into consideration, the level of oversubscription for provision at Mill Strand IPS is not higher than average for full-time pre-school education provision in the area and in fact is lower than some other full time settings, despite the commitment given by the school to *"provide fully funded places for all correct age, first choice applicants"*.

Setting	Number of Places	First preference applications	Oversubscription
Mill Strand Integrated PS	26	53	8%

	(plus 23 in playgroup session)		(with playgroup) 104% (without playgroup)
Ballysally NS	52	67	29%
Portstewart PS NU	26	23	-12%
Harpurs Hill PS NU	26	37	42%

The CfC has supplied a breakdown of the pre-school experience of the Year One intake at Mill Strand IPS over the four years 2014/15 to 2017/18. This indicates that the majority of children attended either the Mill Strand IPS nursery unit, or the school's non-PSEP session. A maximum of three children per year attended funded pre-school education provision outside Mill Strand IPS, again suggesting that the proposed additional places at the setting may be unlikely to displace any existing pre-school education provision in the area.

4. RECENT CHANGES IN PROVISION

There have been no significant changes to the level of pre-school education provision in this area in recent years.

5. TEMPORARY FLEXIBILITY

There were no temporary flexibility requests in the area approved for the 2016/17 or 2017/18 academic years. In April 2017, Mill Strand IPS Nursery Unit made a temporary flexibility request for 4 additional places for the 2017/18 school year. This was not supported by the PEG on the grounds that additional pre-school education places are not required to meet a shortfall in the area and the request was not approved.

There was one temporary flexibility request approved for the 2018/19 academic year. Cuilrath Corner Nursery Unit (Harpur's Hill PS) had a request approved for 2 additional places.

6. RECEPTION PROVISION

One setting within the five mile radius, St Malachy's PS (which has no statutory nursery unit), previously provided reception places in 2014/15 and 2015/16 (4 and 8 places respectively). Reception provision ceased from the 2016/17 academic year, therefore reception provision is not a consideration in relation to this proposal.

7. 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 statutory provision on existing good quality voluntary/private providers in PSEP.

The CfC indicates that Mill Strand IPS nursery unit has been consistently oversubscribed. The EA has advised that the setting received 53 first preference applications at stage one of the pre-school admissions process for the 2018/19 academic year for 26 funded pre-school education places. Overall in the wards in the area, the PEG advises that 173 first preference applications have been received for some 152 funded pre-school education places. This suggests that additional provision at the setting could be sustainable.

The Department requested additional information regarding the non-DE funded playgroup session, in order to aid its consideration of the CfC. The information provided to EYT is attached at Annex E. The data provided demonstrates that in 2017/18, 23 target age children attended the non-DE funded session at Mill Strand IPS, and all but two had listed Mill Strand

IPS as their first preference setting during the pre-school admissions process. For the 2018/19 academic year, 23 target age children have been offered a place in the session, all of which listed Mill Strand IPS as first preference in the pre-school admissions process.

This additional information would appear to demonstrate that part of the potential impact of the establishment of an additional pre-school class at the school could be mitigated, with up to 23 of the 26 additional places potentially being filled by children who may otherwise not avail of PSEP provision. However, it is not clear what impact, if any, would occur in the level of applications if the current full time provision were replaced by a statutory part time session, and the school's commitment to accommodate all first preference applications were removed.

8. ENSURING THE BEST USE OF PUBLIC RESOURCES

In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of the resources available to it. In light of this, it aims to maximise available pre-school education places for target age children, avoiding over provision and the resulting enrolment of children younger than 3 years and 2 months (underage children) in statutory settings. There have been up to 23 underage children attending a statutory pre-school education setting within the five mile radius in each of the last two years.

Given that 23 target age children already attend the non-funded session at the setting, and the fact that there are no underage children currently accessing statutory pre-school education provision within the two mile radius, it would seem unlikely that the proposed additional places, if approved, would lead to any significant increase in the number of underage children accessing pre-school education provision in the area. However, as the playgroup session currently provided is full time, and any statutory provision established would be part time, it is not clear what impact, if any, this would have on the level of applications to the setting.

9. CONSULTATION RESPONSES

The CfC states that there have been a number of meetings between Governors and staff between January 2014 and October 2017 to consider the proposal to establish additional pre-school education provision at the setting. Staff and governors are reported to be keen to see a positive response to parental preference for pre-school education of an integrated management type at Mill Strand IPS. Parents have also been consulted over the previous and current proposals between May 2015 and October 2017. The views of the governors, staff and parents are included in the CfC and are reported to be in favour of taking forward the development proposal.

The EA carried out a pre-publication exercise between January and February 2018, with 77 schools in the Causeway Coast and Glens Council area consulted. Eight responses were received (seven from schools and one from the Controlled Schools Support Council), all of which are reported to express concerns with the proposal. A summary of the main points raised is included in the CfC.

EYT notes that comments received during the objection period include concerns from parents and pre-school providers regarding the potential for 'unreasonable public expenditure', the displacement of existing provision, and a detrimental impact on Shared Education in the area. In particular, it was raised that, as the only Primary School in the area with statutory pre-school education provision, Mill Strand IPS was considered to already be at a considerable advantage to other schools in the area.

10. EA COMMENTS

The EA has advised that the proposal is being taken forward by the Board of Governors in accordance with the EA's Strategic Area Plan and Annual Action Plan 2018/19.

The EA has noted some reservations about the proposal, namely that the implementation of this proposal may "result in increased costs for the existing provision which is already in excess of demand". The analysis set out above however, suggests that currently, funded pre-school education provision within the two mile radius may not fully cater for the demand for pre-school education provision, particularly preference for pre-school education provision of an integrated management type. In particular, there are 23 target age children who currently do not attend any DE funded pre-school education provision. Therefore, while the proposal, if approved, could increase the cost of provision in the area, it may not be in excess of demand in this context.

The EA PEG also considered the DP in line with guidance provided by DE regarding pre-school education and the statutory duty to encourage and facilitate integrated and Irish-medium education and advised that in this context it supports the DP on the basis of demonstrated parental demand as evidenced by:

- the number of first preference applications (53 for 26 places);
- overall enrolment trends for the school and P1 intake over a number of years, which would suggest that a 52 place nursery unit would be sustainable.

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

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

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

11. SUMMARY OF KEY POINTS

- The current level of pre-school education provision within the two mile radius is lower than the planning figures; however, the current level of provision within the five mile radius is significantly above the planning figure;
- Underage children accessed pre-school education places in one setting in the five mile radius;
- EA advise of increased current demand for pre-school education provision in the area, although advise that existing provision would have capacity to cater for this;
- A temporary flexibility request for 2 additional places was approved at Cuirath Corner Nursery Unit for 2018/19 academic year;
- Under the 1989 Education Reform (NI) Order, DE has a statutory duty to 'encourage and facilitate the development of integrated education' which must be considered alongside the duty under Article 44 of the 1986 Order;
- Pre-school education is accessible to all, but first preference applications at Mill Strand IPS suggest a parental preference in the area for pre-school education in schools with an integrated management type;

- Mill Strand IPS operates a non-PSEP full time playgroup session which is attended by 23 target age children who do not appear to attend PSEP funded provision;
- The enrolment at the Mill Strand IPS playgroup session suggests that a nursery class could be sustainable. It also suggests that any displacement effect may have already taken place; and,
- Applications to the setting are not significantly higher than other full time provision in the area, when the school's commitment to provision of funded places is considered.

12. CONCLUSION

The CfC for DP 542 advises that the children attending the non-PSEP funded session are all target age children who applied for a PSEP place, but whose parents chose to avail of the non-PSEP session rather than provision in a PSEP setting (not of an integrated management type). This may indicate a preference for pre-school education provision in the area with an integrated management type, although, as the provision is full time, rather than part time like the non-statutory PSEP provision in the area, this may also be a factor for parents.

The size of the playgroup session, which is almost equal to the number of pre-school education places requested, suggests that any displacement of existing PSEP provision or impact on the number of underage children accessing funded places in the area may have already happened, and therefore, the additional provision requested is unlikely to significantly impact on existing provision in the area or the number of underage children accessing funded pre-school education places.

The EA has advised of rising current demand for pre-school education provision in the area, some temporary flexibility requests have been approved and the level of provision within the two mile radius is below the planning figure, all of which suggests additional pre-school education places could be sustainable, particularly given the fact that 23 target age children are currently attending a session operated outside the PSEP.

Based on the information available, and taking into account the statutory duties placed upon the Department, the Early Years Team considers the proposed change to be reasonable.

The team notes that, at the time of writing, both stage one and two of the pre-school admissions process for the 2018/19 academic year have concluded and the new academic year has begun.

**Early Years (Pre-School) Team
September 2018**

LIST OF PROVIDERS**2 Mile****Nursery Units**

3066544 Millstrand Integrated PS

Vol/Priv

3BB0367 Portrush PreSchool Community Playgroup

3CA0631 Causeway Pre-School

PS No NU

3010847 Portrush PS

3012049 Carnalridge PS

3030547 St Patrick's PS, Portrush

5 Mile**Nursery Schools**

3116215 Kylemore NS

3116263 Ballysally NS

Vol/Priv

3AB0096 St Malachy's Playgroup

3AB0130 Watt Fun Community Playgroup

3AB0248 Millburn Community PreSchool Playgroup

3AB0260 Playhouse Activity Centre

3AB0585 Sunshine Playgroup, Coleraine

3BB0369 St Colum's PreSchool Centre

3CB0486 Stepping Stones Creche, Coleraine

Primary with NU

3012250 Portstewart PS

3016052 Harpurs Hill PS

Primary with no NU

3010892 Ballytober PS

3012237 Killowen PS, Coleraine

3012264 Millburn PS

3012284 D H Christie Memorial PS

3016252 Ballysally PS

3032231 St Colum's PS, Portstewart

3032297 St Malachy's PS, Coleraine

3033709 St John's PS, Coleraine

LIST OF THE WARDS CONSIDERED

**Atlantic
Ballysally
Castlerock
Cross Glebe
Dundooan
Dunluce
Hopefield
Macosquin
Mount Sandel
Portstewart
Royal Portrush
Strand (Coleraine LGD)
University
Waterside**

NISRA LOCAL BIRTH RATES AND POPULATION PREDICTIONS

EYT have considered NISRA local birth rates and population predictions to identify potential future population trends in the area.

- Birth statistics by academic year for all wards which fall at least partially within a 5 mile radius of Mill Strand IPS are decreasing by some 12% from 396 to 348 children in the pre-school cohort between September 2016 and September 2018 admissions.
- Population projections for 3 year olds for the Causeway Coast and Glens council area predict a significant drop in population in the area, with a fall 23% between 2018 and 2039 (1,818 to 1,396)

These figures can, however, only be indicators of the future pre-school population and do not fully take into account population migration and other factors. On that basis they are not an exact predictor of demand.

TEMPORARY FLEXIBILITY

There were no Temporary Flexibility requests approved in the area for the 2016/17 academic year.

The following requests made for the 2017/18 academic year were not approved as the EA advised there was sufficient pre-school education places in the area to meet need:

2017/18	Mill Strand IPS NU	4
---------	--------------------	---

There was a temporary flexibility request approved for the 2018/19 academic year.

2018/19	Cuilrath Corner Nursery Unit*	2
---------	-------------------------------	---

*Nursery Unit attached to Harpur's Hill Primary School.

Mill Strand IPS – Pre-school Playgroup Pupils Agreed with EA

2017/18

23 pupils attended the playgroup

5 pupils were allocated to another pre-school provider

8 places within the pre-school programme were refused by parents

10 pupils were not placed

Playgroup 2017/18 (2/7/2013 – 1/7/2014)

Pupil	Target Age (T) or Not Target Age (NT)	EA Comments	
		First Preference	Notes
1	T	MSIPS	Not Placed
2	T	MSIPS	Refused by Parent
3	T	St Colum's Pre school Portstewart	St Colum's Pre school Centre
4	T	MSIPS	Refused by Parent
5	T	MSIPS	Refused by Parent
6	T	MSIPS	Refused by Parent
7	T	MSIPS	Refused by Parent
8	T	MSIPS	Refused by Parent
9	T	MSIPS	Not Placed
10	T	MSIPS	Not Placed
11	T	MSIPS	Not Placed
12	T	MSIPS	Portrush Community PG
13	T	Portstewart PS NU	Portstewart PS NU
14	T	MSIPS	Not Placed
15	T	MSIPS	Refused by Parent
16	T	MSIPS	Not Placed
17	T	MSIPS	Millburn Community Pre school Coleraine
18	T	MSIPS	Refused by Parent
19	T	MSIPS	Not Placed
20	T	MSIPS	Not Placed
21	T	MSIPS	Portrush Community PG
22	T	MSIPS	Not Placed
23	T	MSIPS	Not Placed

2018/1923 pupils are due to attend the playgroup

3 pupils were allocated to another pre-school provider

14 places within the pre-school programme were refused by parents

6 pupils were not placed

Playgroup 2018/19 (2/7/2014 – 1/7/2015)

Pupil	Target Age (T) or Not Target Age (NT)	EA Comments	
		First Preference	Notes
1	T	MSIPS	Not Placed
2	T	MSIPS	Refused by Parent
3	T	MSIPS	Refused by Parent
4	T	MSIPS	Refused by Parent
5	T	MSIPS	Not Placed
6	T	MSIPS	Refused by Parent
7	T	MSIPS	Refused by Parent
8	T	MSIPS	Refused by Parent
9	T	MSIPS	Not Placed
10	T	MSIPS	Not Placed
11	T	MSIPS	Refused by Parent
12	T	MSIPS	Refused by Parent
13	T	MSIPS	Refused by Parent
14	T	MSIPS	The Irish Society
15	T	MSIPS	Not Placed
16	T	MSIPS	Refused by Parent
17	T	MSIPS	Refused by Parent
18	T	MSIPS	Refused by Parent
19	T	MSIPS	Not Placed
20	T	MSIPS	The Irish Society
21	T	MSIPS	Refused by Parent
22	T	MSIPS	Sunshine Playgroup
23	T	MSIPS	Refused by Parent

F Shared Education and Community Relations Team

Schools within the 5 mile radius which are involved in the DSC SESP are:-

- Killowen PS and St John's PS

Partnership vision is to create a vibrant, self improving Shared Education partnership that will deliver social change through a promotion of:

1. Improved education benefits for the pupils
2. High quality teaching and learning experiences
3. Equality of opportunity for everyone
4. Good relations
5. Equality of identity
6. Respect for diversity
7. Community togetherness
8. The efficient and effective use of resources

- Millburn PS and St Malachy's PS

Partnership believe the potential of their project is underpinned by their commitment as educators to deliver an innovative programme which not only develops existing relationships across the community but challenges the views of others, exposing individuals to sensitive concepts and pre-conceived ideas of identity, reconciliation and difference generally found in both communities. They will engage in Shared Education activities through the following curriculum areas: The Arts, ICT, Using communication, PDMU and PE.

- Harpurs Hill PS and St Malachy's PS

Partnership will share good practice and enhance the working relationships of all the stakeholders through promoting structured play and creative learning in both settings. The teachers will build positive links and create a collaborative learning approach between the settings, sharing good practice and planning for improvement together. The children will pass seamlessly from one setting to another and through a collaborative learning approach, will have opportunities to join up with their peers and learn together through structured play and creative learning. They will build friendships and will develop an understanding of each other's cultures. Building on this approach, will see the children moving through both schools, giving them lots of opportunities to continue their friendships and learning together. There will be joint lessons, collaborative teaching and sharing of good practice. The partnership will become embedded throughout the curriculum and beyond the classroom. Schools will promote a positive inclusive learning environment, with high quality sharing learning.

Schools currently involved in Peace IV are:-

- Portstewart PS and St Colum's PS

In year 1 of their work together they brought together pupils from YR5, 6 & 7 through the areas of WAU, PE and the Arts. Their action plan for next year will build upon this work at KS2 but will look at further areas of development for pupils and staff across the entire school.

Additional Information -

The principals from both Harpur's Hill and St Malachy's Primary Schools govern the Cuirath Corner Nursery School and are on the Management Committee of both Harpur's Hill Children and Family Centre and the Cross-Glebe Community Association.

The integrated nursery with 26 children, HHCFC with 18 children, the P1 classes of St. Malachy's (45 children) and the P1 classes of Harpur's Hill (30 children) will be part of the first year of the project and so as the children move through their schools, the P2 class will be involved in Year 2 and the P3 class will be involved in Year 3.

G Inclusion and Wellbeing Directorate

From a special educational needs (SEN) policy perspective, SET would have no objections to the DP, particularly in regard to the statement in the case for change that the provision of 26 additional part-time Nursery places would enable the school to ensure that all pupils entering Year 1 the following year would, among other things, have equality of early identification of SEN and intervention, raising the long-term educational outcomes for the pupils concerned.

Please note a NIL return from PST.

H Irish-medium and Integrated Education Team

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 we recognise 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').

Looking specifically at Mill Strand and Enniskillen IPS, their religious balances are quite favourable. Mill Stand IPS 2017/18 overall enrolment is 26% Protestant; 27% Roman Catholic; and 47% Other. The Case for Change advises that in 2016/17, the Nursery Unit was 37% Protestant; 26% Roman Catholic; and 37% Other.

Enniskillen IPS has a 2017/18 enrolment of 28.5% Protestant; 44.7% Roman Catholic; and 26.8% Other; while the Case for Change references a Nursery Unit 2016/17 enrolment of 34.6% Protestant; 46.2% Roman Catholic; and 19.2% Other.

In summary, the religious balance in both schools are broadly in keeping with DE policy, and would not be a barrier to either DP being favourably considered.

I Equality Unit

The only comment is to note the reference in the DP to enabling, "the school to ensure that all pupils entering Year 1 the following year would not only have had access to an equally high quality of pre-school provision but also equality of early identification of needs and intervention, raising the long-term educational outcomes for the pupils concerned".