

14 September 2021

**To The Secretary
School Board of Governors and School Trustees**

Dear Sir/Madam

Development Proposal No 671 – Rowandale Integrated Primary School

The Education Authority has received a request by the Board of Governors of Rowandale Integrated Primary School to publish the undernoted proposal in accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986:

A statutory nursery unit will be established at Rowandale Integrated Primary School to provide 26 part-time nursery places with effect from 1 September 2022, or as soon as possible thereafter.

Under the above legislation, the Education Authority is obliged to consult the trustees and managers of any school or schools which would, in the opinion of the Education Authority, be affected by the proposal.

Therefore, I would be grateful if you would draw the matter to the attention of the Board of Governors and Trustees of your school and forward any comments they may wish to make not later than 12 October 2021. Any responses which the Board of Governors/Trustees wish to make in relation to this proposal should be forwarded by email to areaplanning2@eani.org.uk or to: Area Planning Section, Education Authority, 17 Lough Road, Antrim, BT41 4DH. The Authority will consider all written responses received during the consultation process.

Please note that 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.

A draft Development Proposal and Case for Change document are available on the Education Authority's website on the link below:

<https://www.eani.org.uk/school-management/area-planning/pre-publication-consultations>

Comments on the proposal will be subject to the Freedom of Information Act 2000.

Thank you for your help in this matter.

Yours faithfully



**Stephen Martin
Area Planning Officer**

“To inspire, support and challenge all our Children and Young People to be the best that they can be.”

Education Authority

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EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL No 671

ROWANDALE INTEGRATED PRIMARY SCHOOL

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

A statutory nursery unit will be established at Rowandale Integrated Primary School to provide 26 part-time nursery places with effect from 1 September 2022, or as soon as possible thereafter.

A copy of the Proposal and Case for Change may be inspected at the offices of the Education Authority located at Grahamsbridge Road, Dundonald, BT16 1HS, between the hours of 9.00 am and 4.30 pm and www.eani.org.uk/school-management/area-planning.

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

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

Sara Long
Chief Executive

CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

AREA PLANNING DISTRICT	Lisburn and Castlereagh City Council
DP NUMBER	DP 671
PROPOSER	Board of Governors of Rowandale Integrated Primary School Contact: Frances Hughes, Principal Email : fhughes982@c2kni.net
SCHOOL(S) NAME	Rowandale Integrated Primary School
SCHOOL REFERENCE	4066682
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	Date:TBC <i>(Note: Proof of publication should be submitted without delay)</i>
PROPOSAL	Rowandale Integrated Primary School will establish a 26 part-time nursery unit with effect from 1 September 2022 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. 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>I confirm that the school(s) Board of Governors, were consulted in relation to the previous submission of this DP on 31 Oct 2016, 12 Dec 2016, 30 Jan 2017 and 20 Mar 2017, 4 May 2017 and 19 June 2017.</p> <p>In relation to the submission of this DP, the BoG were consulted on 26th March 2019, 23rd January 2020, 29th September 2020 and 15th December 2020.</p> <p>Staff and Parents of Pupils were consulted on May 3rd & 4th 2017 & 28th May 2017 in relation to the previous submission of this DP.</p> <p>In relation to this submission, governors, staff and parents (playgroup and school) were consulted in January and February 2021 through a Google Form survey. In addition, this finalised case for change document was made available for whole school consultation during the month of June 2021. The views of the Governors, Staff and parents are detailed within the document and were unanimously in favour taking forward a Development Proposal for a Nursery Unit.</p> <p>SIGNED:  DATE: 29 June 2021</p>
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<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 and the statutory requirements of the Rural Needs Act (NI) 2016 have been considered where appropriate.</p> <p>NAME: N JOHNSTON OFFICE HELD: CHAIR BOARD GOVERNORS</p> <p>SIGNED:  DATE: 29 June 2021.</p>
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ASSOCIATED PROPOSALS

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

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</p> <p>NAME: OFFICE HELD;</p> <p>SIGNED: DATE:</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> <hr/> <p>Responses/Assurances in respect of issues raised during consultation.</p> <p>Dates of EA meetings e.g. Education Committee/ Board etc</p> <p><u>Details of issues raised by members of EA Board</u></p>	
<p>EDUCATION AUTHORITY COMMENTS In the context of planning on an area basis - what is the EA's view of the proposal, taking into account any pre-publication consultation. Does the EA support the proposal?</p> <p>SIGNATURE: PRINT NAME: POSITION: DATE:</p>	

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1. Background

1.1 Introduction and description of school

In 2005 a steering group of parents and others came together in Moira, County Down, with the aspiration and commitment to develop Integrated primary school provision for the area. On the second attempt, they obtained approval from the Department of Education (DE) and Rowandale Integrated Primary School (IPS) opened in September 2007 with 18 children in a single mobile classroom.

The school was vested by DE in November 2011. DP 255 in 2014 enabled double intake growth. At present, the school has an enrolment figure of 208 (DE census data, 2020) with 13.2 full time equivalent teaching staff¹ and 29 support staff.

The current accommodation is on a site of approximately 3.3 acres with additional land options. The site is 0.6 miles from Moira's Main Street, heading South East on the Clarehill Road. Moira is close to the M1 and is popular with those commuting to and from Belfast whilst seeking a more rural lifestyle.

The school consists of modular buildings (mobile classrooms) which have been added each year as school admissions numbers have increased. The DE has provided nine classroom teaching spaces, one PE/Dining Hall, one resource and one multi-purpose, comprising of a wet room, medical room, general office, principal's office and staff room. The Integrated Education Fund (IEF) provided funds for a mobile to enhance educational provision during the initial growth period and in September 2012 they funded a spacious and modern modular building. This enabled the opening of Rowandale Community Playgroup, which is accommodated in this building.

Since December 2016, the school has been working in collaboration with DE and Hamilton Architects to bring to fruition a new-build school for Rowandale IPS as part of the Fresh Start capital investment. The plans for the new 14 class base school are such that there is room to allow for the potential of a nursery unit as further development. Whilst the pandemic has delayed the completion date of the new build, the school is optimistic that building work will start very soon.

1.2 The locality

At the Super Output Area (SOA) in which the school is located, (Maghaberry 2) this area had an overall Multiple Deprivation Measure (MDM) ranking of 742, where 890 is the least deprived area in NI and 1 is the most deprived.

¹ <https://www.education-ni.gov.uk/services/schools-plus> (2019/20)

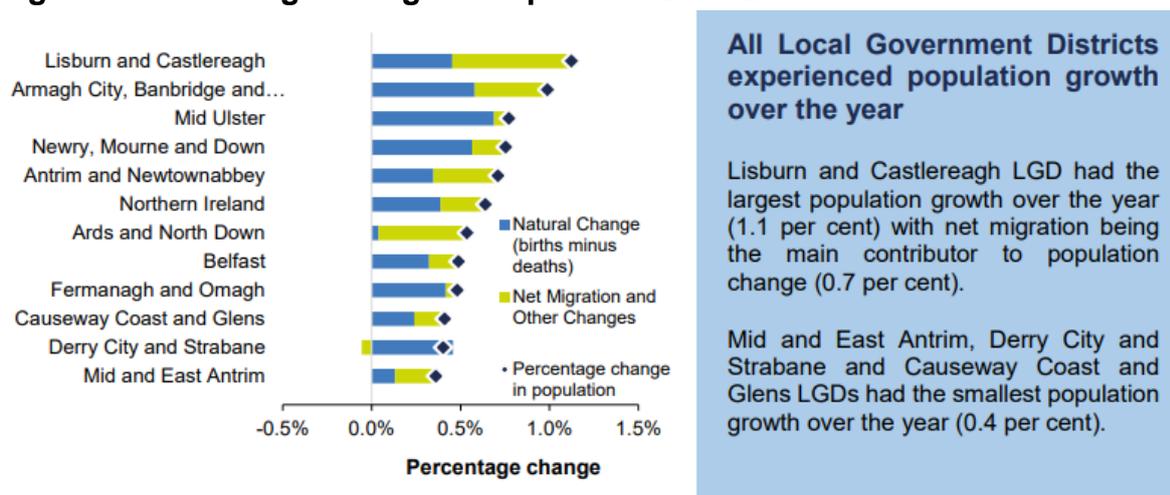
Rowandale IPS is in the Lisburn and Castlereagh Local Government District (LGD). Between 2009 and 2019 the population of 0-15 yr-olds in Lisburn and Castlereagh LGD increased by 8.8% (2400 persons)², see Table 1 below. The only LGDs in NI with a more rapid growth rate of children in the decade of 2009-19 are Armagh, Banbridge and Craigavon (11.8%) and Mid Ulster (10.5%).

The school's location is on the border between two of these three council areas: Lisburn and Castlereagh and Armagh, Banbridge and Craigavon Council area.

Table 1: Population Estimates (2019) for Lisburn and Castlereagh LGD³

Age	Mid-Year			Population change			
	2009	2018	2019	Year ending mid-2019		Decade ending mid-2019	
				Number	%	Number	%
0-15	27,200	29,100	29,600	500	1.6%	2,400	8.8%
16-64	85,000	90,300	91,000	700	0.7%	5,900	7.0%
65 and over	20,200	25,000	25,400	500	2.0%	5,300	26.2%
65-84	18,000	21,800	22,200	400	1.8%	4,300	23.8%
85 and over	2,200	3,100	3,200	100	3.1%	1,000	46.2%
All Ages	132,400	144,400	146,000	1,600	1.1%	13,600	10.3%

Figure 1: Percentage change in Population 2018-2019⁴



Maghaberry ward has experienced high levels of child population growth in the last two decades. In 2001, there were 888 persons aged 0 to 15 yr olds in Maghaberry Ward. By 2019, this figure had risen to 1197. This represents an increase of 34.8% growth of 0 to 15 yr olds in this ward in the 18-year period⁵. By contrast, the whole of NI experienced just a 7.2% growth of 0-15 yr olds in the population in the same period⁶. This boom in the proportion and number of children in the locality is not surprising to

² <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE19-Factsheets.pdf>

³ <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE19-Factsheets.pdf>

⁴ https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE19-Summary_0.pdf

⁵ <https://www.nisra.gov.uk/publications/2019-mid-year-population-estimates-northern-ireland>

⁶ <https://www.nisra.gov.uk/statistics/2001-census/results>

the school staff and community, who have witnessed the influx of families to the environs of the school and the ever-increasing housing development and demand.

1.3 Travel distance of pupils

Table 2 below relates to postcode data provided by the school for 2019/20 pupils. One can see that almost half of the schools' pupils live within a 2-mile radius of the school and 65% of pupils attending the school in 2019/20 lived within 3-mile radius of the school.

Table 2: Distance between home postcode and school as the crow flies: P1 to P7 children's postcodes supplied by Rowandale IPS, June 2020

Distance from Home postcode to Rowandale IPS in a straight line	% of Pupils	Cumulative %	Number of pupils
Less than 1 mile	28%	28%	81
1 to 2 miles	19%	47%	56
2 to 3 miles	18%	65%	52
3 to 4 miles	8%	73%	24
4 to 5 miles	16%	89%	47
5 to 6 miles	6%	95%	18
6 to 10 miles	2%	97%	6
Over 10 miles	2%	99%	5
Totals	99% (due to rounding)	99%	289

The maps below (Figs 2, 3 and 4) indicate the location of pupils attending the school (Fig 2), those in their pre-school year attending the school's private playgroup (Fig 3) and those younger than pre-school year attending the private playgroup (Fig 4).

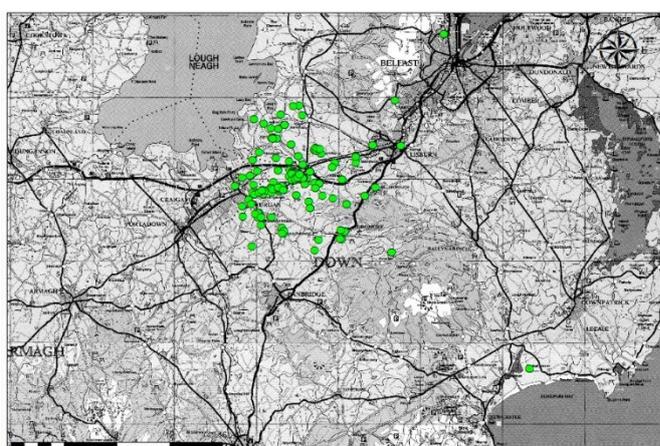


Figure 2: Map showing post code locations of pupils attending Rowandale IPS (Primary 1 to 7, 2019/2020)⁷

⁷ Map provided by DE, using data from the school, Summer 2020

Figure 3: Map⁸ showing post code locations of children attending Rowandale Community Playgroup in their pre-school year 2019/20

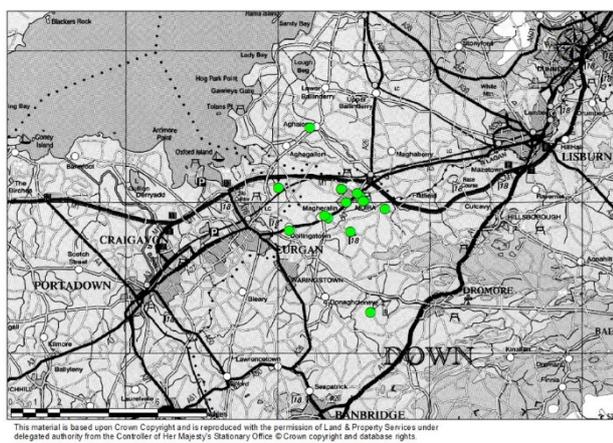
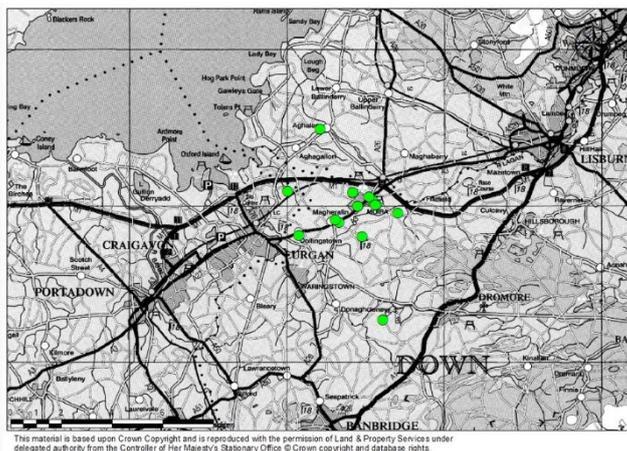


Figure 4: Map⁹ showing post code locations of children under pre-school age attending Rowandale Community Playgroup during 2019/20

On analysis of pupils' postcode data, which is not supplied here due to privacy issues, pupils travel from over 20 different electoral wards to attend Rowandale IPS. These wards are diverse in terms of both the 2017 MDM (ranging from 13 to 556, where 890 is the least deprived) and religious makeup (ranging from 92.7% to 6.2% Catholic and conversely then, 5.6% to 86.4% Protestant. This diversity of origin contributes to the religious balance and the overall diversity in the school, reflected in 2020/21 DE census data which showed 30% of pupils coming from a Catholic background, 42% from a Protestant background and 28% from other or no religious backgrounds¹⁰.

1.4 Enrolment information

The DE census 2020/21 recorded 41 children with special educational needs. This represents 19.7% of the school's enrolment figure in comparison to 19.3% across NI (2019/20 figure)¹¹. In October 2014, the approval of DP 255 enabled growth to double class intake. Table 3 below shows applications, admissions and enrolment numbers

⁸ Map provided by DE using data from the school, Summer 2020

⁹ Map provided by DE using data from the school, Summer 2020

¹⁰ <https://www.education-ni.gov.uk/topics/statistics-and-research/school-enrolments>

¹¹ <https://www.educationni.gov.uk/sites/default/files/publications/education/Special%20Educational%20Needs%202019-2020.pdf>

since the school opened. The school currently has an admissions number of 57 and a total enrolment number of 399.

In September 2020 the school admitted 53 Primary One children, creating a total enrolment number of 308. In September 2021, the school will have double classes in all year groups and is anticipating an intake of 52 children to Primary One in September 2021.

Table 3: Enrolment Growth since the opening of the school in 2007

Academic Year	Enrolment number	Total applications	1st preference applications	Number admitted
2007/08	18	12	Not available	12
2008/9	34	13	Not available	13
2009/10	64	21	Not available	21
2010/11	102	23	Not available	23
2011/12	133	30	Not available	30
2012/13	154	50	44	31
2013/14	181	33	31	32
2014/15	195	32	35	32
2015/16	216	42	36	42
2016/17	243	60	60	57
2017/18	256	37	37	35
2018/19	265	39	39	39
2019/20	291	49	49	49
2020/21	310	53	53	53
2021/2022	*	*	52 (@May 2021)	*

Variety of data sources used to create table: Rowandale IPS, EA and DE statistics

*not available

2. Sustainability Assessment

Rowandale Integrated Primary school meets the definition of a sustainable school as outlined Department of Education's Sustainable Schools Policy.

2.1 Quality Educational Experience

The previous inspection in February 2015¹², evaluated the overall effectiveness of Rowandale Integrated Primary School as 'very good'. It stated that the 'quality of pastoral care at the school is outstanding' and was 'characterised by the very inclusive, welcoming and supportive ethos of the whole school community and in the day-to-day engagement of the staff with the children.'

The sustaining improvement inspection (SII) conducted in March 2018¹³ noted the key findings as follows:

- The senior leadership team has led strategically a revised approach to: short-term planning in literacy and numeracy, with a particular focus on effective evaluations; and, assessment for learning, with a particular focus on marking for improvement.
- The planning is comprehensive and the on-going evaluations are used well to: identify where additional support may be required; set targets for individual children; and, inform the next steps in learning and teaching. The teachers and classroom assistants use highly effective strategies that include targeted individual and small-group support in class and withdrawal support. All of the literacy and numeracy lessons observed, including withdrawal sessions, were good or better in developing effective learning; three-quarters of the lessons were very good or outstanding. The agreed whole-school approach to marking for improvement is evident in almost all of the children's work and is used effectively to inform the short-term planning.
- The children spoke confidently and maturely about the supportive and helpful feedback they receive from their teachers and they are developing well the ability to self-reflect on their learning and independently make any required improvements. The children's work in numeracy and literacy is of a high standard and the quality of presentation in their books is very good. By the end of key stage 2, the children: are very secure in their knowledge of important mathematical ideas and concepts; use mathematical language appropriately; and, apply their mathematical understanding flexibly in real and relevant

¹² <https://www.etini.gov.uk/publications/primary-inspection-rowandale-integrated-primary-school-moira-co-down>

¹³ <https://www.etini.gov.uk/publications/sustaining-improvement-inspection-rowandale-integrated-primary-school-moira-county-down>

contexts. They read with very good fluency, comprehension and expression and talk confidently about the variety of authors and genres they enjoy.

- Safeguarding: During the inspection, the school provided evidence that the arrangements for safeguarding children reflect the guidance from the Department of Education.'
- The inspection concluded that the school 'continues to demonstrate a high level of capacity for sustained improvement in the interest of all the learners.'

2.2 Stable enrolment and admissions

Table 3 at paragraph 1.4 above shows the continuing growth of the school and parental demand for Integrated Education in the area. Enrolments have grown particularly in the last few years following the approval of DP 255, enabling the school to admit 57 pupils per year.

2.3 Sound Financial position

The school is currently operating with an acceptable budget surplus which exceeds the required level for sustainable schools. Because of the nature of the financial governance of a Grant Maintained Integrated school, the school has no ability to operate in deficit.

2.4 Strong leadership and Management

Rowandale Integrated PS has a strong leadership team led by the Board of Governors, Principal, Frances Hughes and Vice Principal Aine Duffy. This was acknowledged in an ETI inspection of the school in April 2015 and in the sustaining improvement inspection of March 2018 as outlined at paragraph 2.1 above.

2.5 Accessibility

Rowandale Integrated PS's central location within Moira provides ease of access for all its present pupils. It is also easily accessible to future pupils travelling from areas outside the current immediate catchment area, being situated approx. 3 minutes' drive (1.5 miles) from the M1 Motorway, with Lisburn around 15 minutes' drive to the east and Lurgan a similar drive time to the west.

2.6 Community Links

The ETI report of inspection in 2015 highlighted the strong community linkages enjoyed by the school, which include the following pre-pandemic activity:

- Breakfast club from 7.30 and after school provision until 6.15pm daily
- The school employs expertise in sports, music and drama from the local community to enhance the children's experiences
- The school has been involved with Moira Primary School in a Community Relations Equality and Diversity in Education (CRED) project.
- Roots of Empathy in conjunction with Queen's University and the South Eastern Health Trust
- The children visit our local churches and world religion places of worship in Belfast on an annual basis to develop the school's ethos of mutual understanding
- The school provides an after-school programme of study for all children in the community who are preparing to receive their First Holy Communion or Confirmation
- The school continues to contribute to community events e.g. the switching on the Christmas lights, events in local churches and in the Moira Demesne
- The school endeavours to use local business to help them with areas of study such as the Estate Agents, the fruit and veg store, the post – office
- The school fund-raises for local and global organisations on an annual basis
- The school employ local business to provide the school with catering: school dinners, daily snack – fresh fruit and veg
- The school is hired by local groups throughout the week

The school provided Key Worker Support throughout the pandemic and provided care and provision for children in the wider community. The school clearly demonstrated its responsibility to support the Frontline and Key Worker staff within Moira and the wider Moira area when other schools closed their doors. The safety and well – being of staff, children and parents was paramount at this time and we ensured that the school adhered to all COVID regulations and guidance. The school is very proud of what we achieved at this time and the children made a video for Captain Tom in support of his fundraising activities. Rowandale is a community school who continued to collect food for the Moira Food bank on a weekly basis to support families in crisis. During the summer of 2020 we developed a summer of athletic programmes so that the children from the area could participate in exercise and well – being. Parents reported that these events had really impacted their children's confidence, being able to be with their friends and enjoy time together supported their recovery from the first lockdown and set them up for returning to school in September 2020. This summer the school has developed a further programme of sports events to ensure all children can attend to support their well – being, fitness and social skills after their experience of the second lockdown.

3. Area Planning Impact

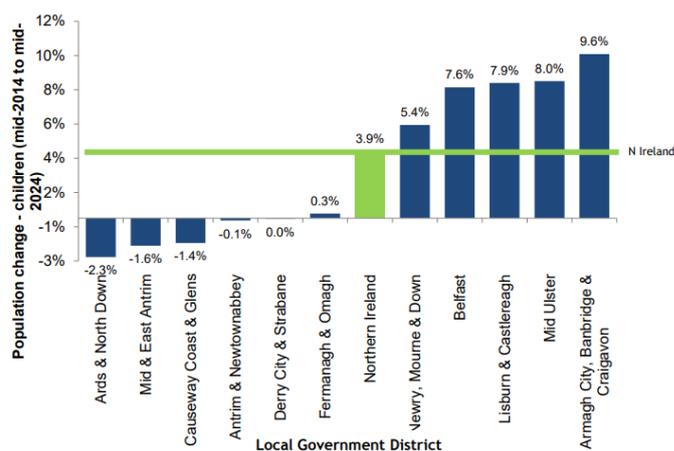
3.1 Population and housing growth

One of the stated aims of Area Planning is to create a network of sustainable schools, the addition of a nursery unit would meet parental demand for Integrated pre-school provision in the area and support the continuation of Rowandale IPS as a sustainable school.

An analysis of the postcodes of children attending the school (2019/20) indicates that over 55% of children live in the wards of Maghaberry (12%), Moira (28%) and Magheralin (15%). As outlined in paragraph 1.2 above, Maghaberry ward, in which the school is situated, has experienced a highly significant increase of 34.8% growth of 0 to 15 yr olds from 2001 to 2019, in comparison to a growth of just 7.2% within this age group in the whole of Northern Ireland in the same period.

Magheralin has experienced an even higher level of youth population growth. Between 2001 and 2019, the numbers of 0-15 yr olds in this ward increased from 959 to 1380, representing a 44% growth¹⁴. The numbers of 0-15 yr olds in the population of Moira have remained level, at just over 1000 in this time frame. When one considers the geography of these wards, this can easily be understood. Moira ward is the town centre area, where housing growth is limited by land availability. By contrast, the wards of Maghaberry and Magheralin, broadly speaking to the North and South of Moira respectively, are areas where housing development has been, and continues to be rapid, attracting families to the area over the past 20 years.

Figure 2: Predicted Population Change 0-15 year olds 2014 to 2024 – taken from ‘Providing Pathways’



¹⁴ <https://www.nisra.gov.uk/publications/2019-mid-year-population-estimates-northern-ireland>

The Providing Pathways: Strategic Area Plan for School Provision 2017-2020¹⁵ document shows a diagram of predicted population change on page 44 (reproduced above as Figure 2) which indicates that the youth population of Lisburn and Castlereagh is predicted to grow by 7.9%. Table 1 at paragraph 1.2 above shows that actual growth is at present exceeding this prediction, with 8.8% growth in the decade ending mid-2019.

In 2017, Lisburn and Castlereagh City Council produced a preferred options paper¹⁶ outlining their plan for development to 2030. It estimates that 13,300 dwellings will be required in that period over the LGD. This local development plan states that whilst household size is expected to decrease over the plan period, the total number of households is predicted to increase by 18%, an increase of approximately 9,500 on the 2012 total of approximately 53,000 households. The paper notes that housing needs remain high across the district, with 2,247 applicants on the waiting list in 2016. Local investigation by the school in 2017 found that there were approximately 765 houses either newly built or in the building or planning process, within a 3-mile radius of Rowandale IPS.

In April 2021¹⁷, Lisburn and Castlereagh City Council planning committee approved an application for 1300 new homes around Maze/Long Kesh, Blaris and Balmoral Park vicinity. The RAF Long Kesh landmark is 4.4 miles from Rowandale IPS and 3.4 miles to the nearest Integrated school, Fort Hill Integrated Primary School.

The population statistics and the LGD plans are evidence that there will be continued population and housing growth in the vicinity of the school over the next decade.

3.2 Impact on other pre-school provision

In previous development proposals for pre-school provision at Rowandale IPS, the Board of Governors of the school has gone to great lengths to present and analyse data relating to local provision. This section of our updated proposal continues to relate to this issue and enables an understanding of the local context and provision.

In a recent submission of papers in relation to DP 645¹⁸, DE stated:

'It is [also] the case that the duty on the Department to encourage and facilitate the development of Integrated education means that it is alternative Integrated provision which should be considered rather than any focus on availability of places in other sectors. This has been clarified through case law.' (para 8.24). Appendix 1 consists of

¹⁵ <https://www.eani.org.uk/sites/default/files/2018-10/Providing%20Pathways%20-%20Strategic%20Area%20Plan%202017-2020.pdf>

¹⁶ https://www.lisburncastlereagh.gov.uk/uploads/files/LCCC_LDP_POP_Main_-_for_web.pdf

¹⁷ <https://www.belfastlive.co.uk/news/belfast-news/more-1300-homes-new-link-20372169>

¹⁸ <https://www.education-ni.gov.uk/publications/dp-645-carrickfergus-central-primary-school-0>

recent Departmental guidance which states that the duty to encourage and facilitate Integrated education extends to pre-school.

We argue that because of the legal definition of Integrated Education, (outlined in the 1989 Order and reinforced by Justice Treacy in 2014¹⁹ as a 'standalone' concept) the decision-making processes required to facilitate and encourage Integrated provision at any school phase, should seek to resolve difficulties and/or the use of inflexible analytic tools which exist in the system, to fulfil the legal duty of article 64 of the 1989 Act²⁰.

In 2015, The Department of Education published the Final Outcomes from the Review of Pre-school Education in Northern Ireland²¹ and stated that 'the current arrangements, based on a policy of non-sectoral provision, will remain.' The assertion that pre-school provision is non-sectoral can be debated. An analysis of statistics shows that although many pre-school settings have a mix of stated religious background, a large proportion of the statutory provision remains predominantly either Catholic or Protestant and this often depends on the management type of the school. However, this debate as to whether pre-school settings are non-sectoral or not is irrelevant as to how the Department's statutory duty to encourage and facilitate Integrated Education is fulfilled because the duty applies to the standalone concept of Integrated Education. Appendix 1 further clarifies that demonstrated parental demand for Integrated Education should be a central consideration. This has been shown previously in this case and continues to be unmet (see section 4.1 below).

The previous submission papers for a nursery unit at Rowandale IPS (DP 535) used distance tools to include or exclude pre-school settings in order to determine levels of provision in the area. These included tables outlining provision at 2-mile, 3-mile and 5-mile radius, with reference in some instances to distance by road and in other instances, no reference to road distance. On review of this data, we have noticed that the use of a two-mile radius rather than a two-mile distance by road creates a very different picture of the levels of provision in the locality.

Tables 4 and 5 below are a summary of a detailed analysis of the data and include statutory and community provisions where they are within the distance criterion stated. The data and sources used to construct tables 4 and 5 are included as Tables 2A to 2I as Appendix 2. Tables 4 and 5 show that when one uses distance by road, rather than distance in a straight line as the criteria to include or exclude any given pre-school provider, a picture emerges which suggests that there is significant under-provision of pre-school places in Moira village, particularly when one uses the percentage of P1 places as a tool to gauge demand, rather than first preference applications to places available.

¹⁹ <https://www.judiciaryni.uk/judicial-decisions/2014-niqb-69>

²⁰ <https://www.judiciaryni.uk/judicial-decisions/2014-niqb-69>

²¹ <https://www.education-ni.gov.uk/publications/final-outcomes-review-pre-school-education-northern-ireland>

The comparative data presented in Tables 4 and 5, combined with our local knowledge of the behaviour of families in the Moira area, leads us to believe that families are unable to access pre-school education in the village of Moira and so are forced to either pay (for Integrated or other private provision – there are eight other private nursery/ day-care options within 5 miles distance by road of Moira village²²) or travel further than is reasonable to access it.

Table 4 shows that when one uses percentage of 1st preference applications against places available as a measure, the data indicates that there is just about enough provision, (106% in 2020 if one uses distance and 100% if one uses radius). The data on Table 4 also contradicts this, when one considers the provision as a percentage of P1 places (62.6% in 2020 if one uses distance and 64.86% in the same year if one uses radius as the measure). Anomalies of this nature are to be expected when one is dealing with data that relies on human behaviours (in this case, the application patterns of families in the Moira area for pre-school places). Some families are deciding to pay for Integrated and other provision in the village and not applying for a pre-school place in the village, due to a variety of reasons which may include preference for Integrated, the demand for statutory places, family working patterns and the perceived over-subscription at Moira Primary School NU. For example, Table 6 below indicates that 14 families in 2019/20 chose not to apply for a funded pre-school place and sent their child to the private provision at Rowandale IPS.

Qualitative evidence gathered by the school in a 2021 survey provides some additional context:

‘Moira Primary nursery is oversubscribed so another nursery option is needed...Parents should have the option of sending their children to an integrated pre-school setting that is funded.’

‘There is a need for more funded nursery places within walking distance of the village. Families with limited access to transport do not have a guarantee that they will get a funded place and may end up not sending their child or having to pay for a place.’

‘There is a great need for more Nursery places in Moira. I have 3 children that are now through the Nursery stage - I never received a first or second or even third choice placement with any of my children as the demand in the area is so high.’

(parents’ responses to school survey in February 2021)

²² https://www.daynurseries.co.uk/day_nursery_search_results.cfm/searchtown/Moira#locations-top

Table 4
Comparison of tools used to measure level of Pre-school provision – 2-mile Radius v’s Distance from Rowandale IPS

Year	RADIUS Level of pre-school provision (% of P1 places)	DISTANCE Level of pre-school provision (% of P1 places)	RADIUS Level of pre-school provision as % of 1st prefs.		DISTANCE Level of pre-school provision as % of 1st prefs.	
			incl. u/a*	excl. u/a	Incl. u/a	Excl. u/a
2018/19	75.21%	77%	88%	92.63%	89.9%	96.9%
2019/20	72.09%	69.8%	75%	80.87%	91.8%	101.5%
2020/21	64.86%	62.6%	90.57%	100%	93.1%	106.3%

- u/a = underage

Table 5
Comparison of tools used to measure level of Pre-school provision – 5-mile Radius v’s Distance from Rowandale IPS

Year	RADIUS Level of pre-school provision (% of P1 places)	DISTANCE Level of pre-school provision (% of P1 places)	RADIUS Level of pre-school provision as % of 1st prefs		DISTANCE Level of pre-school provision as % of 1st prefs	
			incl u/a*	excl u/a	incl u/a	excl u/a
2018/19	126.03%	97%	93.06%	106.62%	96.6%	102.5%
2019/20	121.12%	91.8%	89.26%	105.54%	94.2%	102.8%
2020/21	122.75%	88%	87.82%	103.55%	94.4%	105.5%

- u/a = underage

Table 5, which compares pre-school provision at the 5-mile radius and road distance shows further anomalies, with significant variance whether one uses radius, distance, % of P1 or % of first preference applications to provision as the criterion to determine level of provision.

A further discussion of the use of two-mile, three-mile and five-mile radius is included later in this proposal at section 4.2. We argue that the data presented in Tables 4 and 5 illustrates that the use of the radius tool over a road distance tool is a barrier to the growth of Integrated Education. We consider it to be an inflexible tool which does not enable the consideration of local context and as such ignores the directive of Justice Treacy’s 2014 Drumragh ruling.

3.3 Impact on other Integrated Pre-School Provision

Whilst there are nursery units connected to both controlled and maintained primary schools in the locality, there is currently no Integrated nursery provision. The nearest other Integrated nursery provision is at Forthill Nursery Unit (11 miles), Oakwood Nursery Unit (11 miles) and Portadown Nursery Unit (12 miles). Parents in the locality of Moira wishing to access Integrated pre-school provision are currently significantly

disadvantaged as they have no option but to pay privately for it. Rowandale IPS Board of Governors view this as an inequality which can only be addressed at this time by the Department approving this development proposal.

'We are currently disadvantaged in comparison to many of the other schools in wider area which goes against the entire grain of integration of education. I was unable to use the current pre-school provision as I couldn't afford to pay fees.'

(Rowandale IPS parent, Feb 21)

Approval of this development proposal will not have any impact on other Integrated pre-school provision, rather it will enable the Department to fulfil the statutory duty to encourage and facilitate Integrated education in response to parental demand.

4. Rationale for proposal

When the Pre School Education Expansion Programme was introduced in 1998, Rowandale IPS did not exist. This single fact has disadvantaged the school in its efforts to establish funded pre-school provision since the school opened. The present system requires a shortfall across all provision before funded places can be allocated. As outlined above, this approach does not enable the system to effectively respond to or meet parental demand for Integrated Education and therefore is not in keeping with case law.

The school has repeatedly made requests through all available channels to have a funded nursery. In doing so, we are merely expressing the wishes of local families and the school community. This section outlines the key reasons why the Board of Governors of Rowandale IPS believe that this proposal should be approved.

4.1 Evidence of parental demand

The private community playgroup was established in September 2012, in response to parental demand which was and is continuously expressed directly to the school. The playgroup at Rowandale IPS has been forced to generate its own funding by charging £12 per day. It employs three full-time members of staff and operates daily from 9am – 12pm, providing sessional care for pre-school and pre-pre-school children. The playgroup operates from 9am to 12 midday and can have no more than 24 children in any given session. Because some children do not attend all five days of the week, there are usually more than 24 children ‘on the books’ of the playgroup at any time. In 2019/ 20 the playgroup had 15 children of pre-school age attending every day and another 24 younger children who attend throughout the week – a total of 39. In 2020/21 the playgroup has 11 children of pre-school age and 23 younger children.

The submission papers of DP 535 asserted at paragraph 39 that parental demand is demonstrated in this case by, ‘the non-funded playgroup on the school grounds and the overall enrolment trends for the school and the Y1 intake over a number of years, which would suggest that a 26-place nursery unit would be sustainable.’ This parental demand continues in 2021.

Table 6 overleaf shows application experiences of children attending the private pre-school at Rowandale IPS. This is evidence that there is additional demand that is unaccounted for in the current pre-school application and admissions system.

Table 7 overleaf shows that in September 2020, all 15 children in Rowandale Community Playgroup transferred to Primary 1 in the school. This is evidence that the parents who are paying for Integrated pre-school provision are choosing Integrated Education at Rowandale IPS as a pathway for their child. Table 7 also outlines the upward trend of children transferring from the playgroup to Primary 1 over the past five years.

Table 6: Application experiences of families with children attending Rowandale Community Playgroup

Year	Number of children in pre-school year	Didn't apply for a funded place	Didn't receive a place	Unknown/ other	Offered and declined a place
2014/15	7	5	1	0	1
2015/16	14	7	0	0	7
2016/17	15	7	0	4	5
2017/18	9	5	1	1	0
2018/19	11	11	0	0	0
2019/20	15	14	0	0	1
2020/21	11	2	0	0	0

Table 7: Numbers of children transferring from Rowandale IPS playgroup to Rowandale IPS Primary 1 in September of each year

Year of entry to Primary 1	Number of children who transferred to Primary 1 at Rowandale IPS from Rowandale IPS playgroup
2021 (anticipated)	11 (of 11)
2020	14 (of 15)
2019	11 (of 11)
2018	7 (of 9)
2017	9 (of 15)

Confirmation of the continuing parental demand for Integrated pre-school provision at Rowandale IPS was obtained via a survey of parents in February 2021.

Parents of children attending the playgroup were asked the following question: *If there had been a Nursery Unit attached to the school, would you have sent your child?* **There were 26 responses with 100% stating 'yes'.**

Parents of children in Primary One and asked the following question: *If there had been a Nursery Unit attached to the school, would you have sent your child?* **There were 23 responses with 100% stating 'yes'.**

One parent commented:

'I am keen that parents are offered an integrated nursery option, not just to provide the child and wider family with the optimum integrated experience but also to support NI government in living out its statutory duty to encourage and facilitate integrated education. I do not see how it would be unacceptable to parents and other taxpayers to redistribute existing nursery places in a particular geography to match the wishes of local people (in this case, consider the support levels within the NI population for integrated education and match nursery provision accordingly). As I see it, there has been a protection of existing provision in my local area to suit the provider, rather than to provide what the public wants. This is an unacceptable ethos for the use of public money.'

Table 8: Pre-school Experiences of children entering Y1 at Rowandale IPS

Academic Year	Nursery School	Voluntary /Private Playgroup	Rowandale Community Playgroup	No school experience	Pre-Unknown	Total
2020/2021	7	25	14	4	3	53
2019/2020	6	25	11	4	3	49
2018/2019	4	15	7	8	0	34
2017/2018	5	19	9	2	0	35
2016/2017	3	34	11	1	5	54

Table 8 above indicates that the number of children arriving at Rowandale IPS in the last few years without pre-school fluctuates. In 2018/19, 23 % of children had no pre-school experience 2019/20 this was 14% of children and in 2020, 6%.

Tables 3A and 3B at Appendix 3 below shows the variety of pre-school settings chosen by Rowandale IPS families, the religious mixing and non-mixing of those settings.

4.2 Use of an inflexible analytic tool (application of radius criteria)

As previously referred to, the submission papers of DP 535 included a variety of criteria (distance and radius at 2,3 and 5miles), to measure the level of pre-school provision in the locality. In addition, EA generally use first preferences as a criteria to judge provision levels, whereas DE have tended to use the numbers of the previous year's P1 pupils as a proxy for demand, alongside births.

Whilst families often choose to travel further to access Integrated provision, 89% of the children coming to Rowandale IPS (Primary 1 to 7 in 2019/20) travel less than 5 miles and 28% travel less than 1 mile, as the crow flies (see Table 2 above). At the pre-school level, understandably, given the age of the children, parents choose to travel even less. No pre-school children attending Rowandale Community playgroup in 2019/20, travelled more than 5 miles (radius) and 40% live less than 1 mile (radius) away.

As referred to in section 3.2 above, fewer settings would be considered in the DP 535 submission's analyses if one determined to use road distance with a cut-off of 5 miles, 3 miles or 2 miles as opposed to radius. It seems unreasonable that over-provision in Lurgan and Dromore, whilst these are within the 5-mile radius, but over 6 miles by road, are being considered. Likewise, the nearest Integrated provision is indicated on the Departments' submission as being within a 10-mile radius, but this is in fact 11 miles by road.

Justice Treacy's judgement²³ recommends the use of a more flexible approach in order to fulfil the duty to encourage and facilitate Integrated Education. The use of a 5 mile and/or 2 or 3 mile radius to assess pre-school provision appears to be an inflexible analytic tool which has been used historically. The rationale for the use of this tool is not explained in any policy, guidance or legislation to our knowledge and as such, should not be applied.

Treacy judgement para 60: 'Using an analytical tool to plan for an area is of course acceptable and necessary, however the inflexibility of the projections used will have the effect of making it difficult to accommodate the A64 duty in future day to day decisions. The department need to be alive to the A64 duty at all levels, including the strategic level.'

Justice Treacy's judgement continues, *'It will be easier for dynamic decisions which are in line with long range plan (i.e. where sectoral take up remains proportionately the same) to be approved than dynamic decisions which are out of line with the long range plan (i.e. growth of one sector which has not been projected). It is by no means the case that these kinds of decisions will be impossible, but there will be an additional friction impeding their progress as compared to decisions in line with the long term plan. The creation of an additional difficulty is the opposite of encouraging and facilitating.'*

Other education policy documents do not mention the use of radius as a measuring tool. The sustainable schools' policy, 'Schools for the Future'²⁴ refers to Bain's 'travel time' of no more than 30 minutes each way to primary school and 45 minutes each way for post-primary.

²³ <https://www.judiciaryni.uk/judicial-decisions/2014-niqb-69>

²⁴ <https://www.education-ni.gov.uk/sites/default/files/publications/de/a-policy-for-sustainable-schools.pdf>

'Home to school transport travel times of less than 30 minutes for primary pupils (ie 1 hour per day in total) and 45 minutes for post primary pupils (ie 1.5 hours per day in total).'

EA guidance in relation to school transport uses 2 miles by road in relation to a pupil under 11 years of age²⁵.

The Departmental guidance included at Appendix 1 states:

'The case law has confirmed that in developing and implementing policies, programmes and proposals 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. Further, 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.'

4.3 Underage children in the system and moratorium on full time provision

In August 2019 NICIE submitted a paper to the Permanent Secretary; in December 2019, to the Secretary of State for Northern Ireland and in February 2020 to the Minister of Education. These communications raised the issue of two-year-olds in the system and how the failure to fully implement the recommendations outlined in Learning to Learn – A Framework for Early Years Education (October 2013)²⁶ had been very costly to the education budget. NICIE believes that if the issue of two-year-olds had been dealt with, then there may well have been enough funding to allow for growth in the proposed settings and thereby discharge the DE Article 64 duty from the 1989 Education Reform Order (NI), to encourage and facilitate the growth of integrated education.

²⁵ <https://transport.eani.org.uk/EligibilityChecker/>

² <https://www.education-ni.gov.uk/sites/default/files/publications/de/a-framework-for-ey-education-and-learning-2013.pdf>

Table 9: Underage Applications and Admissions to Statutory Providers in a five mile radius from Rowandale IPS 2018/19 to 2020/21

Statutory Provider	Enrolment Number	Total Underage Applications (1 st Preferences)			Total Underage Admissions		
		18/19	19/20	20/21	18/19	19/20	20/21
Moira PS Nursery Unit	26	5	7	9	0	0	0
Maghaberry PS NU	52	12	11	14	1	12	0
Maralin Village PS NU	26	0	2	1	0	0	0
Dromore NS Full-time	26	7	16	4	0	0	0
Dromore NS Part-time	52	26	23	23	0	8	12
Donacloney PS NU	26	8	6	9	5	0	0
King's Park PS NU	78	0	6	8	0	0	0
Waringstown PS NU	26	1	0	0	0	0	0
Drumnamoe NS Full-time	52	19	20	28	0	0	0
Drumnamoe NS Part-time	52	5	21	11	8	16	9
Total	442	84	115	109	14	36	21

The issue of underage children was considered by the Department in the submission for DP535. Table 9 shows that the numbers of underage children in any given setting is not a trend but a variable. The reference in DP535 submission to numbers of underage children in the system is particularly frustrating because we view this as a symptom of the Department's failure to act in this regard. The Department's own guidance states that demonstrated parental demand should be the key consideration and, in any case, Tables 4, 5, 6 and 7 indicate that there is unmet demand for Integrated pre-school provision, whether underage children in the system are counted or not.

Whilst parents and educators agree that full-time places are more desirable, the continuation of expansion only within part-time provision is another inflexible tool and restriction on growth within Integrated pre-school provision.

5. Educational Impact

Approval for the establishment of a nursery unit at Rowandale IPS will meet the parental demand for integrated pre-school provision in the Moira area. The positive educational impact of this proposal would be significant for the school and area as it would provide an Integrated pre-school education option within a statutory setting.

Approval for the establishment of a nursery unit at Rowandale IPS will increase the potential for shared education links in the area as Rowandale IPS already enjoys good working relationships with Little Rays, Poppins, Moira PS, Rainbow Corner, and Trinity Park.

6. Implementation Plan and Resource Implications

This proposal has an effective date of 1st September or as soon as possible thereafter. There is sufficient space on the current site to accommodate a nursery unit.

In relation to the Development Proposal, a modular classroom and toilets would need to be provided and furnished to provide suitable accommodation for a single class nursery unit and external works would be required to provide suitable play areas and appropriate fencing around the building. It is anticipated that the cost of this would be in the region of £300,000. One full time teacher and one part time classroom assistant would be required at an annual cost of approximately £48,000.

In responding to the needs of local families, it is the intention of Rowandale IPS Community Playgroup to continue to exist as a community focused self-funded social enterprise, in order to support families who want to have children younger than pre-school looked after in our now well-respected playgroup, whilst pre-school children will attend the school nursery unit.

7. Conclusion – Clear New Evidence

In asking the Minister to reconsider the Department's previous decision on this proposal, we have presented what we consider to be new evidence. The previous use of the variety of measures and criterion applied in an inflexible way is problematic, will inevitably create anomalies, is in contradiction of Justice Treacy's ruling and is inhibiting the growth of Integrated Education.

The Departmental guidance at Appendix 1 states that 'embedding and supporting the delivery' of the duty to encourage and facilitate Integrated Education exists 'across all operational areas, including pre-school.'

The Department's previous use of the presence of underage pupils the system as a consideration; the inflexible distance measuring without clear policy or legislative

rationale for its application; the use of P1 and/or percentage of first preference applications against places (applied by DE and EA respectively) as inflexible analytic tools; and the moratorium on new full-time provision each, and collectively, constitute *‘the creation of an additional difficulty (which) is the opposite of encouraging and facilitating.’*²⁷

One way to resolve this problem is for the Department to act as noted at section 3.2 and clarified through case law and to assess the Integrated Education pre-school provision in the locality rather than all types of settings. There is currently no Integrated pre-school provision within 11 miles of the school.

Rowandale IPS is a growing and sustainable Integrated school as outlined above. The school has proved that it is dynamic and capable of driving and managing rapid growth, whilst continuing to embed itself into the fabric of the community. The school consistently delivers high standards of educational provision and fulfils the needs and aspirations of families locally. Rowandale IPS is confident that its growth and future potential are rooted in the highest standards of governance and management which are delivered, catalysed and enriched by an ethos which will ensure sustainability in the future.

As outlined above, this area has and is continuing to experience housing development and youth population growth. Many of these new households are seeking high standards of educational provision and aspire to participate in a reconciled and shared future. As an Integrated school, Rowandale IPS makes a proactive contribution every day to this aspiration.

Departmental guidance (Appendix 1) indicates that parental demand is a key consideration. We have outlined the continuing parental demand and our whole school community wants Rowandale IPS to have this nursery unit and that is why we are continuing to make requests for funded provision.

Justice Treacy (Drumragh Judgement 2014) concluded that the statutory duty applies to what he described as the ‘standalone concept’ of Integrated education, which is distinct from other mixed religion provision. Appendix 1 states that the Article 64 duty (1989 Education Reform Order) applies to all operational areas, including pre-school and that; the principle determining factor in approving the establishment or growth of any integrated provision is asserted as being demonstrated parental demand.

Approval of this Proposal will also enable the Department to contribute to cross-departmental objectives including those in Dew Decade New Approach; Together: Building a United Community; Programme for Government; Policy for Sustainable Schools; and Every School a Good School.

²⁷ <https://www.judiciaryni.uk/judicial-decisions/2014-niqb-6>

Appendix 1 – DE guidance letters relating to pre-school education 2017 and 2018

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Gavin Boyd
Chief Executive
Education Authority
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BT1 4NQ

31 October 2017

Dear Gavin

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

You will be aware that education legislation places specific duties on the Department of Education to encourage and facilitate the development of both integrated and Irish-medium education. These duties are set out in Article 64 of the Education Reform (NI) Order 1989 (integrated education) and Article 89 of the Education (NI) Order 1998 (Irish-medium education). The Education Authority has a key role in supporting the full and effective delivery of both of these important duties.

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. The purpose of this letter is to highlight to the Education Authority the implications of the statutory duty for integrated education in relation to pre-school provision at integrated primary schools.

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.

It is essential that in discharging these duties, the department does not inadvertently constrain the development of either integrated or Irish-medium education. Should any clarification be required on the implications for the allocation of PEG places, then please contact Cathy Galway in the first instance.

I have also written to the Chief Executive of the Council for Catholic Maintained Schools in this regard, and copied this letter to the Chief Executives of the Northern Ireland Council for Integrated Education and Comhairle na Gaelscolaíochta.

Yours sincerely

A handwritten signature in black ink that reads "Tommy O'Reilly".

TOMMY O'REILLY
DEPUTY SECRETARY

cc Róisín Marshall, NICIE
Liam Ó Flannagáin, CnaG

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15 January 2018

Dear Gavin

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

Thank you for your letter of 7 December 2017 regarding pre-school education.

The Department is continually reviewing how it can best fulfil its statutory duties and recent case law, notably the Colaiste Feirste Judgment of October 2011 and the Drumragh Judgment of May 2014, has helped clarify our responsibilities in respect of encouraging and facilitating integrated and Irish-medium education. Indeed, in relation to your point on the level of integration within pre-school education provision, in the Drumragh Judgment, Justice Treacy specifically concluded that the statutory duty applies only to "integrated education" as a standalone concept as defined in Part VI of the 1989 Education Reform Order rather than religiously mixed provision more generally.

The case law has confirmed that in developing and implementing policies, programmes and proposals, 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. Further, 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.

As you will appreciate, the Department funds its executive NDPBs not only to deliver their own statutory functions but also to implement the wider strategic priorities of the Department such as embedding and supporting the delivery of these important duties across all operational areas, including pre-school education.

I note your reference to *Investing in Early Learning* (1998), however, the arrangements set out in that document were designed primarily to apply to the new pre-school education places secured under the expansion phase of the programme which ended in 2002/03. The Department and the Pre-school Education Group (PEG) continues to make every effort to avoid displacement, *where possible*, however this needs to be balanced in the context of *statutory* obligations. The Department's current policy on pre-school education is clearly set out in the *Learning to Learn* (2013) policy.

My 31 October letter confirmed that the Education Authority and the PEG should strive to meet demonstrated parental demand in an area for pre-school education at grant-maintained and controlled integrated primary schools and for Irish-medium pre-school. This does not change our overarching approach that all funded pre-school education settings, regardless of location and management type should remain accessible to children from all backgrounds. The Department considers these objectives to be broadly consistent and not mutually exclusive.

It is not possible to provide the Education Authority with a single definition as to how the statutory duties should be addressed or what constitutes sufficient parental demand in all cases. Rather, 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.

The PEG has already a number of years of experience of assessing proposals and meeting demonstrated parental demand for Irish-medium pre-school provision and it may wish to consider whether a similar approach could be applied when considering development proposals for pre-school education at grant-maintained and controlled integrated primary schools. I have also offered for a senior Departmental official to meet with PEG to discuss any specific implementation issues they would wish to raise.

I hope this further clarification will enable you to address any remaining concerns which Education Authority Board Members may have, but if you feel there are any specific aspects of policy which you would like to discuss, then I would be happy to meet with you. In addition, the Department intends to hold a number of workshops for NDPBs highlighting good practice case studies in this area during 2018. I hope Education Authority officers will find this helpful.

Yours sincerely

A handwritten signature in black ink that reads 'Tommy O'Reilly'.

**TOMMY O'REILLY
DEPUTY SECRETARY**

cc: Alison Chambers
Faustina Graham
Cathy Galway
Suzanne Kingon
Roisin Marshall
Liam O'Flannagain

Appendix 2

Table 2A: Level of Provision – 2 mile distance of Rowandale IPS (as measured by freemaptools by land postcode to postcode and RAC driving address to address)

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision	P1 admissions (EA stats)	Level of pre-school provision (% of P1 places)	1 st Prefs (incl u/a)	Level of pre-school provision as % of 1st prefs		Underage admitted	*Births by Ward: Moira & Maghaberry
								incl u/a	excl u/a		
2018/19	26	36	0	62	81	77%	69 (5)	89.9%	96.9%	0	140
2019/20	26	41	0	67	96	69.8%	73 (7)	91.8%	101.5%	0	115
2020/21	26	41	0	67	107	62.6%	72 (9)	93.1%	106.3%	0	110 (140 in 21/22)

*Live Births by year due to start pre-school.

Table 2B: Level of Provision – 5 mile distance of Rowandale IPS (as measured by freemaptools by land postcode to postcode and RAC driving address to address)

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision (excl Rec)	P1 admissions (EA stats)	Level of pre-school provision (% of P1 places)	1 st prefs (incl u/a)	Level of pre-school provision as % of 1st prefs		Underage admitted
								incl u/a	excl u/a	
2018/19	182	103	3	285	294	97%	295 (17)	96.6%	102.5%	1
2019/20	182	110	19	292	318	91.8%	310 (26)	94.2%	102.8%	12
2020/21	182	104	14	286	325	88%	303 (32)	94.4%	105.5%	0

Table 2C: Pre-Schools and Primary Schools within 2 and 5 miles distance of Rowandale IPS used in tables 2A and 2B above:

Pre Schools within 2 miles:	Primary Schools within 2 miles:
Moirra NU	Rowandale IPS
Rainbow Corner Playgroup	Moirra PS
Little Rays Day Nursery	
Pre Schools within 5 miles:	Primary Schools within 5 miles:
Maghaberry NU	Maghaberry PS
Maralin Village NU	Maralin Village PS
Kings Park NU	Kings Park PS
Busy Bees PG	Meadowbridge PS
Trinity Park PG	St Patrick's PS, Maralin

Table 2D: Pre-Schools and Primary Schools identified by and included by DE in DP535 (Table 2 pages 7-8 and on page 93) which are over 5 miles distance (but within 5-mile radius) from Rowandale IPS (not used in tables 2A and 2B above):

Name of Provider	Primary Schools
Harrison NS	Donacloney PS
Aghagallon PG	Lurgan Model PS
Donacloney NU	Waringstown PS
The Old Station Playgroup	Tannaghmore PS (6 miles)
Rainbow Playschool, Dromore	St Teresa's PS, Lurgan (6.3 miles)
Waringstown NU	St Patrick's PS, Derrynaseer (5.5m)
Drumamoe NS	St Colman's PS, Dromore (6.1m)
Lurgan Model NU	
Jolly Jesters, Dromore	
Dromore NS	

Table 2E: Level of Provision – 2 mile radius of Rowandale IPS (as measured by freemaptools by straight line)

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision	P1 admissions (EA stats)	Level of pre-school provision (% of P1 places)	1 st Prefs (incl u/a)	Level of pre-school provision as % of 1st prefs		Underage admitted	*Births by Ward: Moira & Maghaberry
								incl u/a	excl u/a		
2018/19	52	36	0	88	117	75.21%	100 (5)	88%	92.63%	0	140
2019/20	52	41	0	93	129	72.09%	124 (9)	75%	80.87%	0	115
2020/21	52	44	0	96	148	64.86%	106 (10)	90.57%	100%	0	110 (140 in 21/22)

*Live Births by year due to start pre-school.

Table 2F: Level of Provision – 5 mile radius of Rowandale IPS (as measured by freemaptools by straight line)

Year	Statutory Places	Non-Statutory Places	Reception Places	Total pre-school provision (excl Rec)	P1 admissions (EA stats)	Level of pre-school provision (% of P1 places)	1 st prefs (incl u/a)	Level of pre-school provision as % of 1st prefs		Underage admitted
								incl u/a	excl u/a	
2018/19	468	176	3	644	511	126.03%	692 (88)	93.06%	106.62%	14
2019/20	468	180	19	648	535	121.12%	726 (112)	89.26%	105.54%	36
2020/21	468	174	14	642	523	122.75%	731 (111)	87.82%	103.55%	21

Table 2G: Pre-Schools and Primary Schools within 2 and 5 miles radius of Rowandale IPS used in tables above:

Pre Schools within 2 miles:	Primary Schools within 2 miles:
Moira NU	Rowandale IPS
Maralain NU	Maralin PS
Rainbow Corner Playgroup	Moira PS
Little Rays Day Nursery	
+	+
Pre Schools within 5 miles:	Primary Schools within 5 miles:
Maghaberry NU	Maghaberry PS
Kings Park NU	Kings Park PS
Busy Bees PG	Meadowbridge PS
Trinity Park PG	St Patrick's PS, Maralin
Donacloney NU	Donacloney PS
Waringstown NU	Waringstown PS
Drumamoe NS	Tannaghmore PS
Harrison NS	St Colman's PS, Dromore
Dromore NS	St Patrick's PS, Derrynaseer
Aghagallon PG	St Teresa's PS
The Old Station Daycare	
Rainbow Playschool	
Jolly Jesters	

Table 2H: Pre-Schools and Primary Schools identified by and used by DE in DP 535 which are over 5 miles radius from Rowandale IPS (not used in the tables above)

Pre-Schools	Primary Schools
Lurgan Model NU (5.1m radius)	Lurgan Model PS

**Table 2I: Distances from Rowandale Community Playgroup to neighbouring pre-school providers using various tools.
SORTED BY RAC DRIVING DISTANCES - shortest to longest**

Pre-School Provider	Postcode	Distance postcode to postcode*	Straight line	Driving **	Walking time	Distance as measured by DE ***
Rainbow Corner, Moira	BT67 0LE	1 mile	0.8 mile	1 mile	21mins	0.9 mile
Little Rays, Moira	BT67 0LE	1	0.8	1	20mins	0.9
Moira NU	BT67 0LJ	1.6	1.4	1.6	32 mins	0.8
Maralin NU	BT67 0QZ	3	1.9	2.6	51 mins	2.6
Maghaberry NU	BT67 0JE	3	2.1	3	56 mins	3
Trinity Park PG, Lurgan	BT67 9ND	4.2	3.5	4.1	1hr 20m	4
Busy Bees, Hillsborough	BT26 6DX	4.9	4.3	4.6	1hr 30m	4.5
Kings Park NU	BT66 7BB	5.1	4.6	5	1hr 38m	4.9
Harrison NS	BT66 8SU	5.6	4.9	5.5	1hr 48m	5.4
Aghagallon PG	BT67 0AR	5.6	4	5.5	1hr 38m	5.4
Donacloney NU	BT66 7LP	6.2	4.3	5.7	1hr 53m	6.1
The Old Station Daycare	BT25 1AA	5.8	4.8	5.7	1hr 56m	5.7
Rainbow Playschool, Dromore	BT25 1AA	5.8	4.8	5.8	1hr 59m	5.7
Waringstown NU	BT66 7QH	6.6	4.6	5.9	1hr 56m	5.7
Drumamoe NS	BT67 9EU	6	4.8	5.9	1hr 56m	5.8
Lurgan Model NU	BT67 9AT	6.1	5.1	6	1hr 57m	5.9
Jolly Jesters, Dromore	BT25 1AF	6	4.9	6.1	2hr 2m	6.1
Dromore NS	BT25 1NB	6	4.9	6.2	2hr 1m	6.2

*Measured by freemaptools **RAC address to address ***miles by Google maps

Note: Walking route may be missing footpaths/pedestrian pathways.

Appendix 3

Table 3A: Pre-school experience of Rowandale IPS children 2019/2020

Pre-school Provider	Number of children from this setting	Distance from Rowandale	Funded Y/N	Protestant%	Catholic %	Other %	Total Numbers
Rowandale Community PG	3	0 mile	N				24
Rainbow Corner, Moira	10	1.2 mile	Y	*	*	56.5	23
Little Rays, Moira	7	1.2 mile	Y	*	*	52.9	17
Moira PS NU	1	2.1 mile	Y	46.2	*	*	26
Maghaberry Nursery Unit	1	3.3 mile	Y	60.4	*	*	48
Maralin Village NU	1	3.3 mile	Y	63	0	37	27
Trinity Park, Lurgan	2	4.4 mile	Y	65.2	*	*	23
Harrison Nursery School	1	5.6 mile	Y	84.9	15.1	0	53
Jolly Jesters, Dromore	1	5.8 mile	N	69.2	*	*	13
Aghagallon Pre-School	1	5.6 mile	Y	*	*	0	15
Dromore NS	1	6 mile	Y	54.4	6.3	39.2	79
Busy Bees, Hillsborough	2	8.8 mile	Y	31.7	12.2	56.1	41
Jolly Pirates, Lisburn	2	9.4 mile	N	50	*	*	36
Brefne NS Belfast	1	22.8 mile	Y	*	69.2	*	26
No preschool experience	4	n/a	n/a				
Unknown	11	n/a	n/a				
Total	49						

Figures correct as of 22/04/2021. * figures not available

Table 3B: Pre-school experience of Rowandale IPS children 2020/2021

Pre-school Provider	Number of children from this setting	Distance from Rowandale	Funded Y/N	Protestant%	Catholic %	Other %	Total Numbers
Rowandale Comm PG	14	0 mile	N				24
Rainbow Corner, Moira	10	1.2 mile	Y	56.3	0	43.8	16
Little Rays, Moira	10	1.2 mile	Y	*	*	44.4	18
Maralin Village NU	1	3.3 mile	Y	46.2	*	*	26
Trinity Park, Lurgan	3	4.4 mile	Y	40.9	27.3	31.8	22
Harrison Nursery School	1	5.6 mile	Y	81.1	18.9	0	53
Old Station Day Care	1	5.6 mile	Y	*	*	71.4	21
Dromore NS	1	6 mile	Y	67.1	10.1	22.8	79
Jolly Pirates, Lisburn	1	9.4 mile	N	58.3	*	*	36
Portadown IPS	1	16.7 mile	Y	17	32.1	51	53
Six Mile IPS Reception**	1	20.3 mile	Y	27.2	34	38.8	206
St Patrick's PS Aghacommon	1	22.8 mile	Y	0	*	*	26
St James' PS Newtownabbey	1	24.2 mile	Y	32.9	29.1	38	79
No preschool experience	4	n/a	n/a				
Unknown	3	n/a	n/a				
Total	53						

Figures correct as of 22/04/21. * figures not available ** whole school religious statistics, as reception statistics not available