

Impact Assessment Draft



Assessment of: Proposal to change the age range of St Giles-on-the-Heath Primary School

Service: School Place Planning/School Organisation (CCET) and Early Years & Childcare Service

Head of Service for School Place Planning, CCET: Jamie Hulland

Version / date of sign off by Head of Service: This Impact Assessment is a draft and will be updated through the statutory process with the results of the consultation and formal representation.

Assessment carried out by (job title):

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1. Description of project / service / activity / policy under review

The proposal is to change the age range of St Giles on the Heath Primary School from 4-11 to 2-11 years of age from September 2024.

2. Reason for change / review

The school currently has a Governor run pre school run as a Foundation Stage Unit for nursery aged children and Reception aged children. The Reception Year is the final year of the Early Years Foundation Stage before primary education begins with Key Stage 1 in Year 1.

This proposal is concerned with the pre-school becoming part of the school rather than operating as an extended service. There will be no change in relation to the number of early years places currently offered and no change to the school's published admission number. If the proposal is approved, the main difference is that the pre-school will become a maintained Nursery Class, organised as a Foundation Stage Unit (Nursery and Reception class integrated). Early Years staff will be employed directly by the school and children currently in the pre-school will be registered on the school roll, if the proposal is approved.

Parents will still need to make a separate application to Devon County Council for a place in the Reception Class.

3. Aims / objectives, limitations and options going forwards (summary)

St Giles-on-the-Heath Primary is a small school (under 100 on roll) and is classified as a Rural school under the Designation of Rural Primary Schools (England) Order 2022 (Rural village in a sparse setting). Consideration is given to lowering the age range in schools where there is capacity to do so and to consider an integrated Early Years Foundation Stage Nursery and Reception. Children who attend the Foundation Stage Unit are more likely to apply for a place in the Reception Class.

4. People affected and analysis of needs

Pupils and their families at the school, particularly children on roll in the Governor run Pre-School and the School's Reception Class.

Local families seeking nursey provision.

Staff in the Foundation Stage Unit.

Wider school staff, governors and community.

5. Stakeholders, their interest and potential impacts

Pupils, parents and carers of children on roll. Children on roll in the Governor run Nursery Class and School's Reception Class will be directly impacted by the proposal.

Local families who are seeking early years provision

Local EY Provider/s

Other stakeholders

6. Additional research used to inform this assessment

Department for Education: Making Significant Changes (Prescribed Alterations) to Maintained Schools

Department for Education: Statutory Framework for the early years foundation stage

Cabinet Office guidance on Consultation Principles

The Childcare Act 2006

7. Description of consultation process and outcomes

Devon County Council is obtaining Cabinet Member approval to consult on the proposal to change the age range at St Giles on the Heath Primary School prior to undertaking an informal consultation.

Under Department for Education School Organisation guidance there is no longer a statutory 'pre-publication' consultation period for prescribed alteration changes such as changing the age range, however, there is a strong expectation that governing bodies and local authorities will consult interested parties in developing their proposal prior to publication to take into account all relevant considerations. In light of this, DCC is holding an informal consultation period for five weeks. The informal consultation is taking place from tbc 2024 during term time. The consultation is being carried out in line with the government's Cabinet Office guidance on consultation principles. The informal consultation is taking place to ensure any responses to the consultation are taken into account when developing and taking the proposal forward. The informal consultation is taking place during the formative stage of the plans.

Following on from the informal consultation period a formal representation period will take place should it be agreed to continue with the statutory process.

The representation (formal consultation) period must last for four weeks. During this period any person or organisation can submit comments on the proposal to the Local Authority to be taken into account by the decision-maker. Responses will also be shared with the school as this is considered good practice to ensure the proposer is aware of local opinion.

The Local Authority is the decision-maker. The decision-maker may reject the proposal, approve the proposal with or without modifications.

8. Equality analysis

Giving Due Regard to Equality and Human Rights

The local authority must consider how people will be affected by the service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations.

Where relevant, we must take into account the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, sexual orientation, race, and religion and belief. This means considering how people with different needs get the different services they require and are not disadvantaged, and facilities are available to them on an equal basis in order to meet their needs; advancing equality of opportunity by recognising the disadvantages to which protected groups are subject and considering how they can be overcome.

We also need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).

- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).
- The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are:
 - Informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations.
 - Proportionate (negative impacts are proportionate to the aims of the policy decision)
 - Fair
 - Necessary
 - Reasonable, and
 - Those affected have been adequately consulted.

<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the Diversity Guide and See RED]</p>	<p>How will the project / service / policy / activity:</p> <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps'). • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
<p>All residents (include generic equality provisions)</p>		<p>It is likely that parents and children currently attending the Governor run pre-school, already organised as a Foundation Stage Unit, will see little difference in the practical arrangements.</p> <p>There will be no change to the number of places. There will be no change to the current staffing.</p> <p>Provision will continue to run in the same room.</p>
<p>Age</p>	<p>Ages 2-11 directly affected.</p>	<p>Priority for admission to the provision will be determined by the Council's Nursery Admission Policy. Admissions for nursery children are separate from admissions to the school. Attendance in the Foundation Stage Unit does not provide any priority for admission to the Reception Year.</p>

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Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people		<p>No impact is anticipated. The school is mainstream offering appropriate educational provision for all children for whom a mainstream placement is considered appropriate. All Early Years settings have a responsibility to provide an inclusive service for all children and their families including those with special educational needs and disabilities.</p> <p>The consultation document is available in a different format or language upon request.</p>
Culture and ethnicity: nationality/national origin, ethnic origin/race, skin colour, religion and belief		<p>Places would be available for all children regardless of race, ethnicity, religion or belief.</p> <p>The consultation document is available in a different format or language upon request.</p>

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Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)		The decision will support quality provision for children of all genders.
Sexual orientation and marriage/civil partnership	n/a	n/a

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<p>Other relevant socio-economic factors such as family size/single people/lone parents, income/deprivation, housing, education and skills, literacy, sub-cultures, 'digital exclusion', access to transport options, rural/urban</p>		<p>It is envisaged that this proposal will be cost neutral as the Early Years funding will be received where children are eligible and by parental subscription where they are not.</p> <p>Without this provision, some parents/carers may need to drive to alternative provision which may prohibit some families from being able to access early years education. Environmentally it should reduce traffic into urban areas where parents may otherwise need to access childcare to enable them to work.</p> <p>The socio-economic benefits are great. Childcare enables people to work, it improves life chances for children and reduces social isolation.</p>

9. Human rights considerations:

Under section 6 of the Childcare Act 2006, the Local Authority must ensure there is sufficient childcare within the local area, sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training.

10. Supporting independence, wellbeing and resilience. Give consideration to the groups listed above and how they may have different needs:

All children in the Early Years and Reception Class are taught according to their age related expectations and have access to suitable learning provision. This includes access to experienced teachers working across Key Stage 1.

A financial early years plan for St Giles on the Heath Primary School, has been approved by Devon County Council's School Finance Consultant prior to proceeding to informal consultation on this proposal.

The teaching staff's terms and conditions are not altered by this proposal. Foundation Stage Practitioners are allocated key children and carry out planning and assessments along with the class teachers. Extending the school range will ensure continuity and the quality of education will be run by highly qualified and experienced Early Years Teachers.

The Statutory Early Years Foundation Stage states in relation to provision for 2 year olds: in a maintained school or non-maintained special school, where the two-year-olds are pupils, staff must additionally be under the direction and supervision of a qualified or nominated teacher when carrying out specified work (as laid out in the Education (Specified Work) (England) Regulations 2012). Specified work broadly encompasses lesson (or curriculum) planning, delivering lessons, assessing the development, progress and attainment of pupils and reporting on the latter. The headteacher must be satisfied that the staff have the skills, expertise and experience needed to carry out the work and determine the appropriate level of direction and supervision.

Children in the Foundation Stage Unit are already grouped and taught according to age by the class teacher and/or nursery practitioners with an individual personalised approach and the appropriate child: adult ratios as per the requirements of the Early Years Foundation Stage. The quality of teaching and learning for Reception children will be protected and they will continue to have teacher led and independent learning activities that are carefully planned and delivered to meet the Early Years Framework and in preparation for Year 1.

11. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 4c, otherwise complete the environmental analysis table):

Devon County Council's Environmental Review Process	
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Reduce, reuse, recycle and compost:	n/a	n/a
Conserve and enhance wildlife:	n/a	n/a
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:	n/a	n/a
Conserve and enhance Devon's cultural and historic heritage:	n/a	n/a
Minimise greenhouse gas emissions:	n/a	n/a
Minimise pollution (including air, land, water, light and noise):		Without this provision, some parents/carers may need to drive to alternative provision which may prohibit some families from being able to access early years education.
Contribute to reducing water consumption:	n/a	n/a
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):	n/a	n/a
Other (please state below):	n/a	n/a

12. Economic analysis

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:		<p>The qualification requirements of staff will meet the requirements of the Early Years Foundation Stage Statutory Framework.</p> <p>The provision of childcare enables parent to attend training. There is financial support for some students to help make childcare affordable.</p>
Impact on employment levels:		
Impact on local business:		

13. Describe and linkages or conflicts between social, environmental and economic impacts (Combined Impacts):

The socio-economic benefits are great. Childcare enables people to work, it improves life chances for children and reduces social isolation.

14. How will the economic, social and environmental well-being of the relevant area be improved through what is being proposed? And how, in conducting the process of procurement, might that improvement be secured?

As above.

15. How will impacts and actions be monitored?

Monitoring will be carried out through DCC's Early Years and Childcare Service and through Ofsted inspections.