







Department of Education

EQIA Consultation Report

on a proposal to discontinue support for the conducting of transfer interviews between primary school principals (or a designated teacher) and the parents of P7 children to take effect for the Transfer 2012 procedure.

January 2011

If you require this document in an alternative format please contact the School Access Team by any of the following methods:

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Contents

	PAGE
Introduction	1
Executive Summary	4
Consultation Report	
1 Defining the aims of the proposed change	5
2 Consideration of available Data and Research	8
3 Assessment of Impacts	10
4 Consideration of measures which might mitigate any adverse impact and alternative arrangements which might better achieve the promotion of equality of opportunity.	12
5 Formal Consultation on the actual impacts of existing arrangements and the likely impact of proposed change	13
6 Decision by DE and Publication of Equality Impact Assessment	13
7 Monitoring	13
Annex – Consultation response form	

INTRODUCTION

About the Department of Education

The Department of Education is responsible for the central administration of all aspects of education and related services - excepting the higher and further education sector, responsibility for which is within the remit of the Department for Employment and Learning.

The Department's main areas of responsibility are in pre-school, primary, post-primary and special education; the youth service; the promotion of community relations within and between schools; and teacher education and salaries. Its primary statutory duty is to promote education and to ensure the effective implementation of education policy. Its key functions include:

- **advising ministers on the determination of education policy**
- **framing legislation**
- **accounting for the effectiveness of the education system**
- **allocating, monitoring and accounting for resources**
- **through the Education and Training Inspectorate, evaluating and reporting on the quality of teaching and learning and teacher education**

The Department also aims to ensure that children, through participation at schools, reach the highest possible standards of educational achievement. In pre-school settings, schools and through the Youth Service the Department also promotes personal well-being and social development, so that children gain the knowledge, skills and experience to reach their full potential as valued individuals.

SECTION 75 AND THE STATUTORY DUTIES

Section 75 of the Northern Ireland Act 1998 requires DE, as a Public Authority, when carrying out its functions to have due regard to the need to promote equality of opportunity between nine categories of persons, namely:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without

Without prejudice to its obligations above, DE must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

DE's Equality Scheme outlines how DE proposes to fulfil its statutory duties under Section 75.

Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, the Department of Education (DE) undertakes to carry out an equality impact assessment (EQIA) on each policy or group of co-joined policies where screening has indicated that there may be significant implications in relation to one or more of the nine Section 75 categories.

Part of the EQIA process is consultation.

This EQIA consultation report has been made available as part of the formal consultation stage of the EQIA relating to a proposed policy change in relation to one aspect of the post-primary transfer procedure and we would welcome any comments which you may have in terms of this EQIA and our preliminary recommendations with regard to measures to mitigate adverse impact and alternative policies.

Further copies of this EQIA consultation report are available on our website at www.deni.gov.uk.

If you have any queries about this document, and its availability in alternative formats then please contact:

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The deadline for receipt of responses to the consultation is 9 March 2011.

Following consultation DE aims to have a final report published by 18 March 2011.

Executive Summary of the Consultation Report

Transfer interviews with parents are a long established feature of the transfer procedure which involves children moving from primary to post-primary education. These interviews involve the provision of advice by a primary school (delivered by the primary school principal or a designated teacher) to parents about a number of aspects of the procedure, including the completion of an application form known as the Transfer Form.

Under current arrangements primary schools are able to hire a substitute teacher to cover for a member of staff who is engaged in preparing for, or conducting, transfer interviews. Hiring substitute teachers in respect of work associated with the transfer procedure is one of a number of eligible claims that a school can make against funds held centrally. A full list is contained within a document called the 'Common Funding Scheme' which is published on the Department's website at www.deni.gov.uk.

Proposed Amendment to Teacher Substitution Cover for Transfer 2012

It is proposed that the current arrangements which relate to centre substitution costs where a teacher has been required to be involved in the Transfer Procedure, should be removed from Transfer 2012 onwards. Primary schools would no longer be able to claim for substitute cover for this purpose. Any such change will also require paragraph 4.6 (c) of the Common Funding Scheme to be amended and this will be subject to separate consultation.

Rationale for the Proposed Change

There is a pressing need to generate savings in the education budget, and given the extent of the savings needed no area can be exempt.

Arguments were submitted to the Department by some primary school principals suggesting that, for a number of reasons, transfer interviews were an unnecessary burden on primary schools. It is felt therefore that this area has to be examined for the potential to generate savings.

It is estimated that the current process, which advises all primary school principals to offer transfer interviews to all P7 parents, costs around £400-£500k annually.

In consulting on the proposal to remove the facility for primary schools to claim for substitute cover for the purpose of the transfer procedure, the Department considers that there is scope to build upon existing forms of contact between P7 parents and primary and post-primary schools, as well as enhancing advice from existing sources. It intends advising accordingly in its annual operational guidance circular to schools which issues in September each year.

CONSULTATION REPORT

1: DEFINING THE AIMS OF THE PROPOSED CHANGE

Policy on post-primary transfer rests solely with the Department of Education (DE) and is administered by the Department's School Access Team. Schools are advised of any changes to policy during the spring term and the operational arrangements that will apply each year are communicated to schools in the form of a guidance circular which issues during the autumn term. Parents of P7 children who are due to transfer to post-primary education are provided with an information leaflet towards the end of the autumn term describing their role in the transfer procedure. References to parents throughout this document apply equally to guardians of children.

Transfer interviews with parents are a long established feature of the transfer procedure which involves children moving from primary to post-primary education. These interviews involve the provision of advice by a primary school (delivered by the primary school principal or a designated teacher) to parents about a number of aspects of the procedure, including the completion of an application form known as the Transfer Form.

Transfer interviews may involve the provision of information about:

- how the transfer procedure works;
- the educational progress made by a child during the primary phase of his/her education;
- the suitability of a child for a particular school or type of school; and
- the completion of a Transfer Form to apply for a post-primary place.

Under established arrangements DE has supported this activity by allowing primary schools to claim substitute teacher cover for activities related to the transfer procedure. Such activities may include the writing up of educational reports about children who are due to transfer to inform discussions with parents or guardians, and the transfer interview itself.

Primary schools are able to hire a substitute teacher to cover for a member of staff who is engaged in preparing for, or conducting, transfer interviews. Hiring substitute teachers in respect of work associated with the transfer procedure is one of a number of eligible claims that a school can make against funds held centrally. A full list is contained within a document called the 'Common Funding Scheme' which is published on the Department's website at www.deni.gov.uk.

Rationale for the Proposed Change

There is a pressing need to generate savings in the education budget, and given the extent of the savings needed no area can be exempt.

The Department has given consideration to arguments that were submitted by some primary school principals suggesting that transfer interviews were an unnecessary burden on primary schools. They argued that:

- since there is no longer any transfer test, it is unfair in the extreme to ask them to facilitate those schools operating breakaway entrance tests;
- their focus needs to be on implementing the revised curriculum and helping to drive up standards for all children in their care; and
- parents are able to complete applications to pre-schools and primary schools without this sort of advice and help to complete the forms, so they should be able to do the same when applying to post-primary

It is felt that this area has to be examined for the potential to generate savings. It is estimated that the current process, which advises all primary school principals to offer transfer interviews to all P7 parents, costs around £400-£500k annually.

In consulting on the proposal to remove the facility for primary schools to claim for substitute cover for the purpose of the transfer procedure, the Department considers that there is scope to build upon existing forms of contact between P7 parents and primary and post-primary schools, as well as enhancing advice from existing sources. It intends advising accordingly in its annual operational guidance circular to schools which issues in September each year.

Examples of existing contacts with parents and sources of information and advice that could be enhanced and built upon are:

- parent/teacher meetings conducted by primary schools at which parents would receive information about the progress made by a child at primary school – these could include advice on post-primary school choices;
- primary school open information sessions to groups of P7 parents outlining the transfer procedure – these could include information about how to complete an application to post-primary school known as the Transfer Form;
- open days/evenings conducted by post-primary schools where options open to the child for transfer to post-primary education may be explored – these could include advice on completing an application to the school; and
- published advice in the Department's information leaflet for P7 parents (which would reflect the fact that transfer interviews would no longer be an established part of the transfer procedure), Transfer Booklets, school prospectuses and detailed guidance notes attached to the Transfer Form (which, from Transfer 2011, are specifically targeted at parents).

For the vast majority of parents these measures should be sufficient to ensure that a Transfer Form is completed in a correct and timely manner. There may however be a small number of parents with literacy, language or other difficulties who struggle to fully comprehend the information provided in written guidance or open information sessions. The Department proposes that it should remain open for primary school principals to conduct interviews in such exceptional circumstances, in much the same way as would be the case if a parent required advice and support in respect of any other aspect of a child's educational progress. The number of parents requiring such one-to-one advice on the transfer procedure for exceptional reasons should be relatively small in most schools and therefore such needs should be capable of being met by the school within existing resources.

2: CONSIDERATION OF AVAILABLE DATA AND RESEARCH

If this policy proposal comes to fruition then the current P6 cohort of children will be the first cohort to transfer from primary to post-primary education without the benefit of a transfer interview during their P7 year.

The 2010/11 school census¹ shows that there are 21,683 pupils within the P6 cohort and this figure can be disaggregated to help consider the scale of any impact on children who fall within certain of the designated Section 75 categories. The abbreviation FSME is used to describe children who are entitled to receive free school meals, this being a recognised indicator of deprivation.

Gender

- Male 11126 (51.3%), of whom 2268 are FSME;
- Female 10557 (48.7%), of whom 2132 are FSME.

Religious Belief

- Catholic 11003 (50.7%), of whom 2625 (23.9%) are FSME (12.1% of cohort);
- Protestant 8242 (38%), of whom 1368 (16.6%) are FSME (6.3% of cohort);
- Other 2438 (11.2%), of whom 407 (16.7%) are FSME (1.9% of cohort).

Political Opinion

No specific information is available about the political opinion of these children. The data collected for the school census is sourced from individual pupil records maintained by schools. Political opinion does not form part of that record.

Racial Groups

For the purpose of this EQIA this group includes children from the Traveller community, other ethnic groups and newcomer children for whom English is an additional language.

The P6 cohort breaks down as follows:

- White – 21074 (97.2%), of whom 4271 are FSME (20.3%);
- Newcomer children - 548 (2.5%), of whom 56 are FSME (10.2%);
- Other ethnic - 534 (2.5%), of whom 69 are FSME (12.9%);
- Irish Traveller – 75 (0.3%), of whom 60 are FSME (80%).

¹ 2010/11 school census datasets were not finalised at the time of publishing this EQIA so the data quoted in this section must be considered provisional.

Persons with a Disability

The school census does not gather information about pupils within primary schools who have been assessed as having a disability.

It is however possible to comment on the extent to which P6 pupils have special educational needs (stages 1-4 of the statementing process) culminating in the award of a statement of special educational need (stage 5 of the statementing process).

- Special Educational Need (SEN) (stages 1-4); these are stages of SEN where no statement is in place: 4965 (22.9%) of whom 1643 are FSME (33.1%);
- Children in receipt of a Statement of Special Educational Need (stage 5): 868 (4%) of whom 320 are FSME (36.9%).

Persons with Dependants

While we would not expect children in this age group to have personal responsibility for the care of a child, some may, nevertheless, have responsibilities as a carer if their parent(s) is/are incapacitated. However, there is no data available on the number of children likely to have responsibilities as a carer.

Marital Status

This is not applicable to the P6 cohort.

Age

The policy proposal will impact on all those whose age qualifies them to be part of the P6 cohort.

Sexual Orientation

The Department does not collect data on the sexual orientation of young people but the policy proposal will not disadvantage young people in relation to their sexual orientation.

3: ASSESSMENT OF IMPACTS

The proposed policy has been considered and the following assessments made as to whether or not there will be an adverse impact on any of the nine Section 75 categories or any of the multiple identity groups:

	Group	Adverse Impact on specific sub group
3.1	Religious Belief	The Department does not have cause to believe that children or parents of various religious beliefs would be subject to a disproportionately adverse impact.
3.2	Political Opinion	The Department does not have cause to believe that children or parents of various political opinion would be subject to a disproportionately adverse impact.
3.3	Race	Parents of P7 children who have recently arrived in the country and/or parents who may not be fluent in the spoken or written English language for whatever reason may particularly rely upon advice and guidance provided during a transfer interview and could therefore be proportionately more disadvantaged if support for it is discontinued. The statistics indicate that 2.5% of the current P6 cohort are from newcomer families and 2.5% from families of other ethnic groups.
3.4	Age	The Department does not have cause to believe that the age of a child transferring or its parent would have a bearing on the extent of any adverse impact experienced.
3.5	Marital Status	The Department does not have cause to believe that the marital status of a parent would have any direct bearing on the extent of any adverse impact experienced. However, it could be argued that only single parents have to manage their child's transfer entirely on their own if help from the primary principal (or designated teacher) is not generally available.
3.6	Sexual Orientation	The Department does not have cause to believe that the sexual orientation of a child or parent would have any bearing on the extent of any adverse impact experienced.
3.7	Gender	The Department does not have cause to believe that gender would have any bearing on the extent of any adverse impact experienced.

3.8	Disability	<p>P7 children whose parents have learning and/or linguistic difficulties may be proportionately more disadvantaged if they are unable to rely upon direct assistance with completion of a Transfer Form during the course of a transfer interview. There are no figures available to assess the potential numbers of children who may be affected for this reason.</p> <p>P7 children who have special/additional needs, but who are not statemented, may have parents who need professional educational advice about the most appropriate school choice for their child referenced to the degree of complexity of the child's needs. Such parents and their children may be adversely affected if they do not receive this advice. 22.9% of the current P6 cohort are on stages 1-4 of the statementing process. Of this number a proportion will have complex needs that are best addressed at certain schools, and of that group a proportion may have parents who will not be aware of how best to meet their child's needs without advice from an education professional. It is not possible to estimate what proportion of this 22.9% would have needs sufficiently complex to require this advice.</p>
3.9	Dependency	<p>The Department does not have cause to believe that dependency would have any bearing on the extent of any adverse impact experienced.</p>
3.10	Multiple identities	<p>The Department does not have cause to believe that the number of Section 75 categories that apply to children or parents would have any bearing on the extent of any adverse impact experienced.</p>

4: CONSIDERATION OF MEASURES WHICH MIGHT MITIGATE ANY ADVERSE IMPACT AND ALTERNATIVE ARRANGEMENTS WHICH MIGHT BETTER ACHIEVE THE PROMOTION OF EQUALITY OF OPPORTUNITY

	Adverse Impact	Mitigation which improves equality of opportunity
	<p>DE is proposing mitigating measures to ensure that parents are not unduly disadvantaged through the removal of support for transfer interviews. The Department considers that the needs of parents and children can be met by building upon existing forms of contact between P7 parents and primary and post-primary schools, as well as enhancing advice from existing sources. Examples of how this may be achieved are included within Section 1 on page 6 and apply in equal measure to those identified below as being at risk of an adverse impact.</p>	
<p>3.3</p> <p>3.5</p> <p>3.8</p>	<p>Parents of P7 children who have recently arrived in the country and/or parents who may not be fluent in the written or spoken English language for whatever reason may particularly rely upon advice and guidance provided during a transfer interview and could therefore be proportionately more disadvantaged if support for it is discontinued.</p> <p>It could be argued that single parents may rely more heavily upon the advice and support provided at a transfer interview in the absence of a co-parent to provide a balanced consideration of the options open to a child prior to completing a Transfer Form.</p> <p>P7 children whose parents have learning and/or linguistic difficulties may be proportionately more disadvantaged if they are unable to rely upon direct assistance with completion of a Transfer Form during the course of a transfer interview.</p> <p>P7 children who have special/additional needs, but who are not statemented, may have parents who need professional educational advice about the most appropriate school choice for their child referenced to the degree of complexity of the child's needs. Such parents and their children may be adversely affected if they do not receive this advice.</p>	<p>There may be a small number of parents with literacy, language or other difficulties who struggle to fully comprehend the information provided in written guidance or open information sessions. The Department proposes that it should remain open for primary school principals to conduct interviews in such exceptional circumstances, in much the same way as would be the case if a parent required advice and support in respect of any other aspect of a child's educational progress. The number of parents requiring such one-to-one advice on the transfer procedure for exceptional reasons should be relatively small in most schools and therefore such needs should be capable of being met by the school within existing resources.</p>

5: FORMAL CONSULTATION ON THE ACTUAL IMPACT OF EXISTING POLICIES AND THE LIKELY IMPACT OF PROPOSED POLICIES

DE wishes to engage with as wide an audience as possible on its findings and proposals to date as described in this report, although it is considered that those with the greatest direct interest will be primary school principals and teachers, teacher unions, parents of P6 children and the children themselves.

- A copy of this report and the consultation response form will be posted on the DE website.
- A child friendly version of the consultation report will be posted on the DE website.
- All of the consultees listed in our Equality Scheme will be notified of the consultation. Views from the Parenting Forum and Children's Commissioner will be especially welcomed.
- The report will be made available, on request, in alternative formats.
- A press release will be prepared.
- Advertisements inviting the public to comment on this matter will be placed in the main newspapers in Northern Ireland, in accordance with normal practice.

A consultation response form is included as an annex to this document.

The closing date for responses is 9 March 2011.

Any enquiries about the consultation should be addressed to the officer responsible whose contact details appear on Page 3.

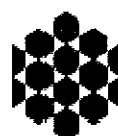
6: PUBLICATION

The outcomes of this formal EQIA consultation will be published on the DE website.

7: MONITORING

DE will monitor the success of the policy in achieving its objectives as outlined in 1 above by employing the following Indicators:

- The number of P7 pupils unplaced at the end of May 2012 compared to those unplaced at the end of the Transfer 2011 process (May 2011).
- Savings achieved within the education budget.



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Department of Education EQIA Consultation Response Form

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The closing date for responses is 9 March 2011





Your Details:

Name: _____

In what capacity are you responding?

Parent of a P6 child?	<input type="checkbox"/>	Postcode Area BT
Other parent of a school age child?	<input type="checkbox"/>	Postcode Area BT
Other adult member of the public?	<input type="checkbox"/>	Postcode Area BT
Child or young person of school age?	<input type="checkbox"/>	Postcode Area BT
Organisation involved in education? If yes, please specify the organisation you represent and position held	<input type="checkbox"/>	
Other? If yes, please specify in what capacity you are responding.	<input type="checkbox"/>	

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EQIA CONSULTATION RESPONSE FORM

1. Do you agree that all relevant groups that might experience a differential adverse impact as a result of this proposal have been identified? Yes/No?

- If “no”, which other groups should also be identified and why?

2. Do you agree that the proposed mitigating actions will reduce the potential for a differential adverse impact on the groups identified? Yes/No?

- If “no”, why not? What other mitigating actions should be considered and why?

Please return your completed response by posting it to:

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School Access Team
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43 Balloo Road
Rathgill
BANGOR
BT19 7PR

or send by e-mail to: schoolaccessteam@deni.gov.uk

or fax to: 028 91 279417

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