## Impact Assessment

Assessment of: Proposal to change the age range of Two Moors Primary School from 3-11 to 2-11 years of age.

#### 1. Description of project under review

Two Moors Primary School's Governing Body is consulting on a proposal to extend the age range of the school from 3-11 to 2-11 years of age from 3 November 2025.

The school has been working in partnership with Devon County Council (DCC) to bring this proposal forward and DCC is supportive of the proposed change to the age range.

#### 2. Reason for change / review

Two Moors Primary School currently has a nursery offering provision for children aged 3 and 4. The school, with DCC's support, is proposing to extend the age range of the school to 2-11 years of age so that initially up to 5 places for 2 year olds can also be offered.

There will be no reduction in the number of places for 3 and 4 year olds as a result of this proposal. The provision will be term time only.

With children starting at a younger age it will be possible to identify their needs sooner and to put in place support and interventions before they reach statutory school age if these are needed. This will be beneficial to the child and could have cost savings for the school in the longer term.

We envisage that this increase in provision will provide valuable support to the community and ensure children have an excellent start to their school journey.

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

There is demand in the area for additional provision and in light of the increase to early years entitlements for working families from September 2025 when the funding increases from 15 to 30 hours a week, there is a projected increase in the demand for two year-old places.

Through expanding the nursery provision offer to 2-year-olds, the school will be able to establish the strongest links possible with families, working to support them from a younger age. Two Moors Primary is an Ofsted Good school. Ofsted has identified that in the early years, staff instil their high expectations quickly. This ensures that children get off to a strong start. This proposal, if approved, will offer high quality, flexible provision and a wider choice of provision types for parents. Children will be supported to develop the skills ready to start in the reception class. Being able to offer places from a younger age will provide greater consistency and continuity for children before starting at school and enable staff to make a more significant impact through earlier identification of their needs.

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

#### 4. People affected and analysis of needs

Pupils and their families at the school Local families seeking provision for their children aged 2 years old. Staff in the Nursery provision Wider school staff and governors. Other Local Early Years Providers.

The following changes to childcare funding for working parents are the key drivers for change:

- April 2024:- all working parents of two-year-olds can access 15 hours per week
- September 2024:- all working parents of children aged 9 months up to three-years-old can access 15 hours per week
- September 2025:- all working parents of children aged 9 months up to three-years-old can access 30 hours per week

It is likely that up to 60% of children in the age groups above will be eligible for the new entitlements.

To determine the possible number of children who may be eligible for the new entitlements, average take-up over a year (Autumn 2023 to Summer 2024) is used.

#### 5. Stakeholders, their interest and potential impacts

Pupils, parents and carers of children on roll.

Local families who are seeking provision for 2 year olds. It is considered that this proposal will have a positive impact for local families seeking provision as it will increase the number of available places.

Local EY Providers. It is not considered that this proposal will have a detrimental impact on existing providers due to the increased demand for early years provision in the area due to the new childcare entitlements. Local early years providers will be consulted.

Local employers

Other stakeholders

#### 6. Additional research used to inform this assessment

Department for Education: Making significant changes ('prescribed alterations') to maintained schools, August 2025

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

A consultation is taking place from 8 September to 6 October 2025 during term time. The consultation will be carried out in line with the DfE guidance and the government's Cabinet Office guidance on consultation principles. The consultation will be widely circulated to include all parents/carers, staff, governors, county and district councillors, union representatives, equality groups, MP, local early years providers, all schools and the town council. The consultation will be published on the school's website and on Devon County Council's Have Your Say consultation

website.

Following completion of the consultation, the school's Governing Body will meet and will consider all responses received to the consultation and make a decision as to whether or not to approve the proposal.

#### 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:
  - o 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.

- o Proportionate (negative impacts are proportionate to the aims of the policy decision)
- o Fair
- o Necessary
- o Reasonable, and
- o Those affected have been adequately consulted.

Characteristics	Potential or actual issues for this group.  [Please refer to the <u>Diversity Guide</u> and <u>See RED</u> ]	<ul> <li>How will the project / service / policy / activity:</li> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps').</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> <li>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</li> <li>Are you complying with the DCC Equality Policy?</li> </ul>
All residents (include generic equality provisions)		The proposal affects the children now able to attend the nursery provision at the school. It also affects the parents/carers of children who, if the proposal is approved, can access childcare for their 2 year olds and the early years workforce in the school.  The proposal may affect other local early years providers. However, it is not considered that this will be a detrimental impact as there is increased demand in the area for places due to the new childcare entitlements. The consultation will be sent to early years providers within five miles of the school.

Characteristics	Potential or actual issues for this group.  [Please refer to the <u>Diversity Guide</u> and <u>See RED</u> ]	<ul> <li>How will the project / service / policy / activity:</li> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps').</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> <li>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</li> <li>Are you complying with the DCC Equality Policy?</li> </ul>
Age	Ages 2-11 directly affected.	Provision of additional nursery places where needed. Data supports the need for this development in provision. Providing improved local choice for nursery places for families.  It is considered that the provision of 2-year-old places will be positive as it will increase opportunities for children to access early education. It will also help to support the sustainability of the school.  Providing 2-year-old places supports children to develop age appropriate language and communication skills and physical, social and emotional development. Supporting young children's early learning and development is especially important for disadvantaged 2 year olds enabling a positive impact at a younger age and easier transition.

Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people	Potential or actual issues for this group.  [Please refer to the <u>Diversity Guide</u> and <u>See RED</u> ]	<ul> <li>How will the project / service / policy / activity:         <ul> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps').</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> </ul> </li> <li>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?         <ul> <li>Are you complying with the DCC Equality Policy?</li> </ul> </li> <li>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.</li> <li>The consultation document is available in a different format or language upon</li> </ul>
		request.
Culture and ethnicity: nationality/national origin, ethnic origin/race, skin		Places would be available for all children regardless of race, ethnicity, religion or belief.
colour, religion and belief		The consultation document is available in a different format or language upon request.

Sex, gender and gender identity (including men,	Potential or actual issues for this group.  [Please refer to the <u>Diversity Guide</u> and <u>See RED</u> ]	<ul> <li>How will the project / service / policy / activity: <ul> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps').</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> </ul> </li> <li>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</li> <li>Are you complying with the DCC Equality Policy?</li> </ul> <li>The decision will support quality provision for children of all genders.</li>
women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)		
Sexual orientation and marriage/civil partnership	n/a	n/a

Characteristics	Potential or actual issues for this group.  [Please refer to the <u>Diversity Guide</u> and <u>See RED</u> ]	<ul> <li>How will the project / service / policy / activity:</li> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, 'close gaps').</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> <li>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</li> <li>Are you complying with the <a href="DCC Equality Policy">DCC Equality Policy</a>?</li> </ul>
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		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.  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.  The socio-economic benefits are great. Childcare enables people to work, increase working hours and or return to work benefiting local businesses and the local economy and improves life chances for children and reduces social isolation.

#### 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, so far as is reasonably practical, 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:

For some children the transition from nursery to Reception class can be difficult. Allowing children to remain in the same environment until the start of key stage one can help build confidence and security.

#### 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):

Environmental Review Process	
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	

	Describe any actual or potential negative consequences.	Describe any actual or potential neutral or positive outcomes.
	(Consider how to mitigate against these).	(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.	Describe any actual or potential neutral or positive outcomes.
	(Consider how to mitigate against these).	(Consider how to improve as far as possible).
Impact on knowledge and		The qualification requirements of staff will meet the
skills:		requirements of the Early Years Foundation Stage Statutory
		Framework.
		The provision of childcare enables parent to attend training.
		There is financial support for some students to help make
		childcare affordable as well as funding to enable parents to
		work and train.
Impact on employment levels:		With increased take up, further staff will be allocated to meet
		the requirements of the Early Years Foundation Stage
		Statutory Framework and staff:child ratios.
		More families will be able to start working or to increase the
		hours that they work because more childcare will be
		provided
Impact on local business:		Parents working in local businesses will be able to return to
		work. This will help to sustain the local community and
		improve families social mobility.

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

This proposal will provide families in the area with provision for 2 year olds. It may mean that families will not have to travel to other providers further away.

By enabling children to start in the nursery from 2 years old will remove a transition point for some children. Those more disadvantaged children who are eligible for 2-year-old funding may currently go to different providers. They may then come back to the school at age 3 into the nursery or at 4 into the reception class. With the proposed new places, they will be able to start with us when they are eligible for the targeted two year old funding.

Being able to offer places from 2 years old will provide greater consistency and continuity for children before starting at school and enable staff to make a more significant impact on their learning and development as well as enabling earlier identification of children's needs well before they start in the reception class.

# 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?

There will be more choice for families if this proposal is approved.

More opportunities for parents to be able to start work, increase working hours or train because childcare will be available. The combined overall impacts are seen to be positive.

### 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.