



**nicie**

NORTHERN IRELAND COUNCIL FOR  
INTEGRATED EDUCATION



CELEBRATING

**40**  
**YEARS**

INTEGRATED  
EDUCATION



**Northern Ireland Council for Integrated Education**

**Response to the Integrated Education Bill**

**October 2021**

## **Call for Evidence - Integrated Education Bill Inquiry**

### **Response from the Northern Ireland Council for Integrated Education**

**October 2021**

#### **1.0 Introduction**

The Northern Ireland Council for Integrated Education (NICIE) is pleased to respond to the Education Committee Inquiry on the proposed Integrated Education Bill. NICIE welcome initiatives which seek to advance our mission ‘to promote reconciliation in Northern Ireland through Integrated Education’. In this submission we provide some general information about NICIE and then outline our viewpoint on each Clause of the Bill.

#### **2.0 About NICIE**

NICIE began in 1987 and is a company limited by guarantee and recognised as a charity by the Charity Commission NI. NICIE is a Non-Departmental Public Body (“NDPB”) with the Department of Education as our sponsoring department and primary funder. We support the Department with their statutory duty to ‘encourage and facilitate the development of Integrated Education’. Our strategic aims are to promote, support and grow Integrated Education, whilst being an effective organisation. We facilitate existing Integrated schools through training and support focused on the development of their Integrated ethos. For Grant Maintained Integrated schools we provide a representation function on their behalf on several key educational forums. We grow Integrated provision through work with parent groups who want to establish a new school in their community, and we support existing Integrated schools who wish to expand their enrolment. We enable further growth through providing support, advice and training to existing schools who want to ‘Transform’ to Integrated status.

We have a staff team of 12 people, including four part-time members of staff.

#### **3.0 Policy Objectives of the Bill**

NICIE is in broad agreement with the 9 policy objectives relating to the Bill. If enacted, NICIE believes the Bill could play a significant role in removing the current barriers to the growth of Integrated Education and enable parental preference to be better met. The policy objectives are largely in line with the recommendations of the

‘Independent Review of Integrated Education’<sup>1</sup> published in 2017 which provides a robust evidence base. Given the policy objectives are reflected in each clause of the Bill, we will provide more expansive comments in the section below.

## **4.0 Comments on Clauses**

### **4.1 Clause 1 – ‘Meaning of “Integrated Education”’**

NICIE is supportive of the definition of Integrated Education provided in the Bill. Article 64 of the 1989 Education Reform Order (NI) provided a minimalist definition of Integrated Education, referring to it as, ‘...the education together at school of Protestant and Roman Catholic pupils’.<sup>2</sup> The definition provided in the draft Bill expands on this definition, to include those of different cultures, religious beliefs (or none), those experiencing socio-economic deprivation and those of different abilities. This enhanced definition essentially takes elements of the NICIE ‘Statement of Principles’<sup>3</sup> for Integrated Education and includes them in legislation. The Statement of Principles was first devised in 1991 and was further revised in 2007. It was created to provide schools with a set of principles that could guide the development and maintenance of an Integrated ethos and give practical expression to the legislation. NICIE recognise that in the outworking of this definition, it will be necessary for the Department of Education to provide a new policy framework to discharge their duties outlined throughout the Bill. NICIE would suggest in applying clauses 1(a) and 1(b) that a ‘reasonable for the area’ approach could be taken in line with how they currently assess levels of religious balance stipulated in the ‘Integration Works’ guidance.<sup>4</sup>

NICIE notes that the draft Bill does not alter the process for an existing school to acquire Integrated status through Transformation, as laid out in the 1989 Education Reform Order (NI). Should any further drafting of the definition be required, NICIE would be happy to support this process.

### **4.2 Clause 2 – The Purpose of Integrated Education**

NICIE believe the Clause largely reflects the purpose of Integrated Education. The purpose clause is in line with the NICIE Statement of Principles<sup>5</sup> and the current

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<sup>1</sup> <https://www.education-ni.gov.uk/publications/report-independent-review-integrated-education>

<sup>2</sup> <https://www.legislation.gov.uk/nisi/1989/2406/article/64>

<sup>3</sup> <https://www.nicie.org/wp-content/uploads/2012/08/Statement-of-Principles1.pdf>

<sup>4</sup> See Page 25 <https://www.education-ni.gov.uk/sites/default/files/publications/education/Integration%20Works%20-%20Transforming%20your%20School%20December%202017.pdf>

<sup>5</sup> IBID

body of research that attests to the impact of Integrated Education in relation to educational benefits, good relations and respect for identity, diversity and community cohesion. NICIE would suggest that this clause could be further strengthened with an emphasis that these purpose statements are provided through standalone Integrated schools rather than through two or more schools from different sectors working together. An appropriate amendment to this clause might involve changing the line: ‘*The purpose of integrated education is—*’ to “*The purpose of integrated education **provided through an Integrated School** is...*’.

#### **4.3 Clause 3 -Advisory Body**

NICIE concur with the principle that consultation with a specialist body would be an important element in the outworking of the Bill. NICIE would believe itself to be well positioned to play such a role, given the experience gained over nearly 35 years in the development of Integrated Education. NICIE would suggest this clause could be further enhanced if the scope and focus of consultation was more clearly defined as functions of the Department of Education pertaining to Integrated Education.

#### **4.4 Clauses 4 & 5 - Promotion etc of integrated education and definition of Promotion**

NICIE agrees with the overall objective of these clauses which seek to make the Department of Education alongside the Education Authority ultimately responsible to assess, monitor and provide Integrated Education places based on demonstrable parental demand. NICIE is cognisant that every Integrated school has either been established by a parent group or Transformed through a parental ballot. No Integrated school to date has ever been established by a statutory planning authority. The current proposal to create a Controlled Integrated School in the Coleraine area<sup>6</sup> is a welcome development and may provide a model for future planning. The aim of this clause could have a significant and positive impact on the growth of Integrated Education.

NICIE believes Integrated Education should be a viable option in our education system for all parents and children who want it. There have been a series of policy initiatives and political agreements across the past 20 + years that have contained promising references to the advancement of Integrated Education but have not been fully implemented or operationalised. These include Article 13 of the ‘Belfast/Good

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<sup>6</sup> This proposal will establish a new co-educational, 11-18, non-selective controlled integrated post-primary school in Coleraine, in partnership with Ulster University (being in effect an amalgamation of North Coast Integrated College, Coleraine College and Dunluce School). More information available at <https://www.eani.org.uk/school-management/area-planning/pre-publication-consultations/causeway-area>

Friday Agreement' (1998),<sup>7</sup> The 'Shared Future' policy (2005)<sup>8</sup> and the 'Stormont House Agreement' (2014)<sup>9</sup>. The Independent Review of Integrated Education published in 2017 also recommended:

*'that DE brings forward legislation to place a duty on DE and the EA and a power on all other Arms Length Bodies to encourage, facilitate and promote integrated education'. (Page 26).*

There have been a number of surveys that evidence public support for Integrated Education. A recent NI Attitudinal Poll by LUCID Talk launched in July 2021<sup>10</sup> shows 71% of NI people questioned in this survey believe Integrated Education should be our main model of education. This is an increase of 5% since the last Lucid Talk poll conducted in 2013 (66%). Likewise, there is consistent oversubscription of several Integrated schools, with The Executive Office Good Relations Indicators citing that in 2018/19<sup>11</sup>, 21% of first preference applications to post-primary integrated schools did not result in admission to that particular school. Research conducted by Ulster University published in 2021<sup>12</sup> concluded that:

*'...over a quarter of households (28%) are located in areas of Northern Ireland where access to Integrated primary schools is limited and a similar percentage (26%) are remote from Integrated post-primaries...'*

There is ongoing evidence of parental demand in the form of polls and actual oversubscription of Integrated schools, yet geo-mapping exercises<sup>13</sup> illustrate that for many families across Northern Ireland, Integrated Education is not a viable or accessible option. The reality is that without strategic planning at Departmental level, Integrated Education will not be able to grow at the pace necessary to meet demand and be a realistic choice for those families who wish it for their children. It is worth noting that unfilled places in Integrated Schools are below those for non-Integrated provision as evidenced in the table below based on the 2020/21 school year. It is well documented that there are too many schools in Northern Ireland and whilst it is healthy to have some unfilled places to ease movement by individual children within and between sectors, all sectors will experience unfilled places until the school estate has been fully rationalised. This should never be used as a reason to inhibit meeting the demand for Integrated Education.

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<sup>7</sup> Page 23

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/136652/agreement.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/136652/agreement.pdf)

<sup>8</sup> [https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm\\_dev/a-shared-future-policy-2005.pdf](https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm_dev/a-shared-future-policy-2005.pdf)

<sup>9</sup> <https://www.gov.uk/government/publications/the-stormont-house-agreement>

<sup>10</sup> A full copy of the report, including the methodology, sample size and background of participants can be found at <https://view.publitas.com/integrated-education-fund/northern-ireland-attitudinal-poll/page/4-5>

<sup>11</sup> See Pg 19 <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/ni-good-relations-indicators-annual-update-2019-report.pdf>

<sup>12</sup> Ulster University - 'Parental choice of primary and post-primary schools: myth or reality? Available at [https://www.ulster.ac.uk/\\_data/assets/pdf\\_file/0009/809019/TEUU-Report-08-Parental-Choice.pdf](https://www.ulster.ac.uk/_data/assets/pdf_file/0009/809019/TEUU-Report-08-Parental-Choice.pdf)

<sup>13</sup> IBID

2020/21	Integrated	Non-integrated
Primary	12.4%	19.4%
Post-primary (non-grammar)	10.3%	14.7%

NICIE notes some concern that has been expressed that these clauses, alongside clause 7, ‘elevate’ one sector above another. There are multiple perspectives from which to view this assertion.

Firstly, whilst the term ‘sector’ is applied to Integrated Education, what this means in any legal or practical sense is unclear. Integrated schools are presently either under the auspices of the Education Authority as the managing authority of ‘Controlled Integrated’ schools or ‘Grant Maintained’ whereby the individual school Board of Governors are the managing authority.

Secondly, Integrated Education has developed across 40 years to a situation where in 2021/22 there are presently 68 Integrated schools or just over 6% of the number of schools in NI. Integrated schools enrol c.25,000 pupils or about 7.3% of the total school enrolment. There are 50 Voluntary Grammar Schools, 446 Catholic Maintained schools and 488 Controlled schools (excluding Special and Hospital Schools).<sup>14</sup> Some of these schools were founded over 100 years ago and have had considerable time to develop. These specific clauses are primarily focused on measuring and meeting demand and there is no legislative basis on which these schools could be forced to become Integrated. The pathway to a Transformation to Integrated status would continue to be guided by the 1989 Education Reform (NI) Order. NICIE would contend that these clauses would enable the ‘levelling up’ of Integrated Education as opposed to elevation over other forms of schooling. Ultimately, we contend that the principle of parental preference should always underpin the provision of school options.

With regards to the use of the word ‘Promotion’ NICIE would be happy to consider alternative language that may better reflect the responsibilities outlined in the clauses. The phrase ‘*Assessing and Meeting Parental Demand for Integrated Education*’ might be an appropriate alternative. We also recognise that inclusion of an aim to increase the demand for the provision of Integrated Education may cause some concern for other providers. NICIE notes that current government policy outlines a vision of a “*a united community, based on equality of opportunity, the desirability of good relations and reconciliation - one which is strengthened by its diversity, where cultural expression is celebrated and embraced and where everyone can live, learn, work and socialise together, free from prejudice, hate and*

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<sup>14</sup> <https://www.education-ni.gov.uk/sites/default/files/publications/education/Schools%20and%20pupils%20in%20Northern%20ireland%201991-92%20to%202020-21.xlsx>

*intolerance.*<sup>15</sup> The Draft Programme for Government aligns Integrated Education with the priority area ‘Tackling Sectarianism, Building Respect and Identity’<sup>16</sup>. The Department of Education’s own guidance ‘*Integration Works*’ (2017) states:

*‘Integrated education brings together pupils, staff and governors from Protestant, Catholic and other cultural traditions within a single school community. As children and young people prepare to live and work in a global, multicultural and pluralistic society, the benefits of educating them together are increasingly recognised. As we aim to become a shared society that respects diversity, Integrated Education has much to offer the school system and society as a whole.’*<sup>17</sup>

As has been noted, the Executive Office measure applications to Integrated schools as a good relations indicator on the basis that, ‘Preference for integrated education is an important indicator of attitudes towards other communities, as well as an indicator of preference for a shared community’<sup>18</sup>. Given the trajectory of government policy towards reconciliation and a shared society and the fact that these policies cite Integrated Education as a method of delivery, it would seem reasonable to conclude that government should pro-actively seek to increase demand for Integrated Education, thus enabling it to fulfil its potential to support these initiatives. NICIE is willing to work with the Bill’s sponsor and legislators to further shape these clauses to address current impediments to the growth of Integrated Education

#### **4.5 Clause 6 -‘General Duty’ and Clause 13 ‘Interpretation: General’**

NICIE support the general principle that Integrated Education can be best supported by a coordinated effort across Education bodies. Clause 6 may benefit from detailing what is meant by ‘include provision for Integrated Education’. This is particularly pertinent for the Education Authority and the Council for Catholic Maintained Schools as they are planning authorities. NICIE notes that the Department of Education’s Arm’s Length Bodies already have to include an action to ‘support DE in fulfilling its statutory duty to encourage and facilitate the development of Integrated and Irish Medium Education’ within their annual Business Plans. This Clause would appear to be largely a continuation of that duty.

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<sup>15</sup> Together: Building a United Community available at [https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm\\_dev/together-building-a-united-community-strategy.pdf](https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm_dev/together-building-a-united-community-strategy.pdf)

<sup>16</sup> Page 30 Available at <https://www.northernireland.gov.uk/sites/default/files/consultations/newnigov/pfg-draft-outcomes-framework-consultation.pdf>

<sup>17</sup> Page 2 available at <https://www.education-ni.gov.uk/sites/default/files/publications/education/Integration%20Works%20-%20Transforming%20your%20School%20December%202017.pdf>

<sup>18</sup> Page 19 <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/ni-good-relations-indicators-annual-update-2019-report.pdf>

NICIE would suggest that under Clause 13, the inclusion of a measure to enable the Department of Education to add any relevant education body without the need to amend the legislation. This could be a newly established body or one that has been redesignated.

#### **4.6 Clause 7 – ‘New Schools’**

NICIE supports the principle that new schools should be presumed to be an Integrated School unless that would be inappropriate by reason of special circumstances. This support is on the understanding that parental preference in an area remains the cornerstone of planning decisions. The will of parents and local communities should constitute a ‘special circumstance’ if an Integrated school was not the preferred option. NICIE believes that the provision of Special Needs Education would fall outside of this Clause as current legislation prevents a Special School from having Integrated status alongside Hospital Schools. NICIE believes that preference for an Irish Medium School would also constitute a ‘special circumstance’. NICIE contends that working from an operating assumption that a new school is Integrated will require enhanced community consultation on the part of planning authorities and that ultimately this will lead to a more participative and democratic form of school provision.

NICIE agree that the religious demographics of an area and the existence of spare places in existing schools should not be treated as special circumstances. Planning school types based on religious demography runs the risk of further separating children based on religion. We note that there are non-Integrated schools where mixing occurs, and this should be viewed very positively. However, our analysis of the 2020/21 school census data shows that these schools are limited in number. There are 996 Primary and Post Primary schools in NI and of those, only 143 reach a base criterion of 10% mixing i.e., a minimum of 10% of pupils from the ‘minority tradition, either Protestant or Catholic. If we remove the Integrated schools only 83 schools reach this low criterion. There are 287 schools (across Primary and Post Primary) that have no pupils from the other main tradition within their enrolment (i.e., a Controlled school with no Catholic pupil or a Catholic Maintained with no Protestant pupil).

In relation to the ‘existence of spare places in other schools’, this is an ongoing issue that has constrained the growth of Integrated Education. This criterion essentially blocks additional Integrated places in an existing school, or the creation of a new school, by measuring it against the enrolment of non-Integrated schools. This means that Integrated Education can only grow where neighbouring schools of other types are either at full enrolment or oversubscribed. For example, in 2021, writing against a Development Proposal to establish a new Integrated College in the Mid-Down area, the Education Authority stated:

*‘With a number of schools in the area undersubscribed, the proposal fails to consider the potentially detrimental impact of the establishment of another school in the area on these existing schools’.*<sup>19</sup>

Whilst NICIE takes Area Planning processes seriously, the current application of this criterion is unfair and negates parental preference for Integrated Education. It would appear in this situation that EA and the managing authorities are acting as ‘arbiters of growth’, a situation referred to by Justice Treacy in his ruling on the Drumragh Judicial Review in 2014, where he established that Integrated Education is a ‘standalone concept’<sup>20</sup>. The EA position seems to be an attempt to veto the establishment/growth of an Integrated school in an attempt to protect undersubscribed schools of other types. The Mid-Down scenario further evidences that spare places in other schools are being used to inhibit growth, hence the need for *‘the existence of spare places in other schools’* to not be a special circumstance of rebuttal.

Clarification from the Bill’s sponsor outlined that Clause 7 is only referring to the establishment of a ‘brand new’ school as opposed to amalgamations. If this is the case, NICIE believes the current wording of the Bill would need amended. It is NICIE’s understanding that the concept of an amalgamation has no legal standing under current planning measures. The process from a legal point of view is the discontinuation of two or more schools and the creation of a new school, which we believe would invoke this clause. It would be NICIE’s belief that in order to transform the well documented sectoral focus of area planning<sup>21</sup>, that clause 7 should include schools that are brought about through a rationalisation process. Again, this is on the basis that ultimately the wishes of parents and communities would decide what type of school would best meet the needs of the area.

In evaluating this clause, NICIE notes that it is not a new idea. The first Triennial Action Plan (2006-2009) under the Shared Future policy (2005) made three similar commitments: <sup>22</sup>

- *in decision making on new schools or reorganisation/rationalisation of schools, proposals will be required to demonstrate that options for collaboration/sharing on a cross-community basis have been considered and fully explored;*
- *on the basis of clear criteria to be developed, projects relating to new schools, re-organisation or rationalisation are more likely to justify receipt of financial support if they are shared or operate across the community divide; and*

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<sup>19</sup> Page 10, available at [https://www.eani.org.uk/sites/default/files/2021-09/DP%20667%20668%20Case%20for%20Change\\_0.pdf](https://www.eani.org.uk/sites/default/files/2021-09/DP%20667%20668%20Case%20for%20Change_0.pdf)

<sup>20</sup> See

<https://www.judiciaryni.uk/sites/judiciary/files/decisions/Drumragh%20Integrated%20College%20E2%80%99s%20Application%20and%20in%20the%20matter%20of%20a%20decision%20of%20the%20Department%20of%20Education.pdf>

<sup>21</sup> The sectoral focus of area planning has been highlighted in several reports -see pg 17

<https://www.education-ni.gov.uk/publications/report-independent-review-integrated-education>

<sup>22</sup> See page 26 [A Shared Future - First Triennial Action Plan 2006-2009 \(executiveoffice-ni.gov.uk\)](#)

- *a shared model of schooling will be treated as the presumed option for new housing developments which are similarly shared;*

NICIE would contend that if a clause that presumes new schools to be Integrated cannot be agreed, that the formal consideration of shared solutions should be placed on a statutory footing, whether in the case of a brand-new school or one resulting from an amalgamation. These solutions should maximise the potential for young people to be educated together in one school with mixed personnel in terms of governance and staff. Any exploration should include rigorous and demonstrable evidence being produced by the proposer(s) as to why shared and Integrated solutions are being rejected. The religious demographics of an area should not be treated as a special circumstance to prevent a shared solution.

#### **4.7 Clause 8 – ‘Integrated Education Strategy’**

NICIE strongly concur with the purpose of Clause 8. Placing such requirements on the Department of Education to strategically plan for Integrated Education in partnership with key stakeholders accompanied with accountable targets and monitoring is required to further develop Integrated Education. NICIE would again refer to the Independent Review of Integrated Education which also recommended this as an area for development. NICIE notes that this clause would also enable Grant Maintained Integrated schools to fully avail of services provided by the Education Authority which is welcomed and necessary.

#### **4.8 Clause 9 – ‘Biennial Reporting’**

NICIE agrees with the accountability measures outlined in this clause which will enable the transparent and effective monitoring and refining of the Integrated Education strategy. NICIE is open to options on the time period for reporting but believe a minimum requirement should be at least one report within the lifetime of an NI Assembly mandate.

#### **4.9 Clause 10 – Regulations**

NICIE believes that this clause enables the effective infrastructure and policies to be developed that will support the other elements of the Bill. NICIE would be happy to support policy development around these themes working in partnership with the Department of Education and other stakeholders.

NICIE welcomes that provision of training in areas of diversity and inclusion extends beyond Integrated schools, enabling greater impact. This is important as evidence suggests there is still considerable work required to uphold high standards of

teaching and learning in these areas. We note in particular two reports by the Education and Training Inspectorate (ETI).

I. Inspection Reports on CRED Policy, 2015

*‘In the inspection period 2012-2014, one-quarter of the PDMU lessons in primary schools and one-third of Citizenship and Personal Development lessons in post-primary schools were not effective’.* (Page 10)<sup>23</sup>

II. The Shared Education Signature Project Evaluation Report, 2018 stated:

*‘Across the sector, there is a limited consensus and understanding of what is meant by reconciliation outcomes. In addition, some of the partnerships did not recognise sufficiently the potential of key curricular areas such as PSE, PDMU, LLW and history education to support their shared learning. ‘*

*‘Others stated that they did not have the confidence and skills needed to handle sensitive and controversial issues and reported the need for ongoing professional learning and up-to-date resources. (Page 19)<sup>24</sup>*

NICIE is pleased that the Clause includes inspection measures which can support ongoing reflection on and refinement of Integrated Education practice. NICIE has developed a quality framework for ‘Excellence in Integrated Education’ through the development of Self Evaluation Indicators. This has already been shared with ETI and we would be happy to engage further with them on this matter.

#### **4.10 Clause 11 -Guidance**

NICIE would view the Department of Education issuing and receiving guidance relating to the act as a necessary part of full implementation.

#### **4.11 Clause 12 – Consequential Amendments**

12(1) NICIE notes the change to Article 64 of the 1989 Education Reform (Northern Ireland) Order. We understand that the revised meaning of Integrated Education in Clause 1 of the Bill will effectively replace the statement “, that is to say the education together at school of Protestant and Roman Catholic pupils”. NICIE has commented on this in Section 4.1 of this response.

12(2) NICIE notes the change to Article 66 of the 1989 Education Reform (Northern Ireland) Order. Again, we understand that this change requires Boards of Governors

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<sup>23</sup> See <https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/%5Bcurrent-domain%3Amachine-name%5D/an-evaluation-of-the-impact-of-the-cred-policy-in-schools-and-youth-organisations.pdf>

<sup>24</sup> <https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/shared-education-signature-project-evaluation-report.pdf>

to exercise their best endeavours to provide Integrated Education as defined in Clause 1 the proposed Bill. NICIE would query if Article 88<sup>25</sup> of the 1989 Education Reform (Northern Ireland) Order would not also require such an amendment with reference to Controlled Integrated schools.

12(3) NICIE have outlined our view on Clause 7 of the Bill. The Shared Education Act or other necessary legislation should be amended in line with this Clause.

## **5.0 Conclusion**

NICIE reiterates our belief that this Bill represents a significant opportunity to support the growth of Integrated Education in line with parental preference and societal need. We understand that the Independent Review of Education is imminent, and we look forward to engaging fully in that process. However there have been a number of missed opportunities to further advance Integrated Education through previous policy initiatives over the past 20 years. This includes a delay in addressing the recommendations of the Independent Review of Integrated Education. Likewise, by way of comparison, there have been significant delays in agreeing a fundamental reform of Health and Social Care following the 'Systems, Not Structures - Changing Health and Social Care' strategic review. NICIE therefore believe the Bill should be advanced and could be revisited, repealed or amended as necessary following the outworking of the Independent Review of Education. It is also likely that in the period after that report there will be a need to build political consensus around any legislation that may be necessary to advance the recommendations, potentially adding to any timeline for implementation.

## **6.0 Contact Details**

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<sup>25</sup> <https://www.legislation.gov.uk/nisi/1989/2406/article/88>