

## **Changes to Education (Pupil Registration) (England) Regulations 2006**

**Department for Education**

**RPC rating: validated**

### **Description of proposal**

The proposal would require schools to inform the local authority when a pupil is about to be removed from their admission registers for 'non-standard transitions'; those occurring prior to the pupil completing their time at the school. On request schools will also be required to provide local authorities with information on standard transitions. There are currently around 385,000 non-standard removals, and 438,000 non-standard additions, each year. Improved record keeping around non-standard transition is expected to improve safeguarding of children and reduce the risk of 'poor outcomes'.

The school will have to provide information on why the pupil is being removed from the register, the pupil's home address and relevant contact details and new address and school where possible. Schools will also be required to inform the local authority when they have registered a new pupil. The IA discusses a voluntary approach to encouraging the sharing of information.

### **Impacts of proposal**

#### **Costs**

The proposal is expected to affect 24,000 schools, including 2,400 independent schools. Using consultation responses, the Department estimates that familiarisation with the requirements will take a leadership teacher just under one hour, at an average hourly wage of £45 including non-wage labour costs. Therefore, familiarisation is expected to impose one-off costs of around £1 million across all schools, of which £100,000 is expected to fall on independent schools.

The Department estimates that meeting the requirements will take an administrative member of staff about 55 minutes for each pupil leaving a register, and 17 minutes to notify the local authority for each new pupil. The Department uses the average wage of administrative occupations (including non-wage labour uplifts) of just over £13 per hour.

Using census data and an internal study of a group of pupils, the Department estimates that an average of 957,000 removals and 1,022,000 additions to school registers per year will be affected by the proposal. Of these, 13,000 removals and 27,000 additions will affect independent schools' registers.

The Department expects the proposal to cost schools £15.2 million each year, of which £0.3 million falls on independent schools. Responding to local authority requests for further information is expected to cost a similar amount (£0.6 million each year).

The IA also includes information on the expected scale of costs to local authorities (nearly £10.8 million each year), and to parents as a result of the time taken to provide additional information (£4.4 million each year).

### **Benefits**

The Department states that it would not be proportionate to provide robust quantification of the expected benefits, because it is not known how many non-standard transitions are associated with poor outcomes or how many would be prevented by this proposal. However, the Department presents a break-even analysis to estimate that the policy would provide a net benefit to society if it prevents between 570-700 'poor outcomes', such as child sexual exploitation or female genital mutilation.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.7 million. This will be a qualifying regulatory provision that will score under the business impact target.

### **Quality of submission**

The Department uses data from the consultation to estimate the costs of the proposal, including explaining that the costs would be likely to limit the effectiveness of the voluntary approach significantly. The IA would, however, benefit from a further explanation as to why familiarisation is assumed to take longer for local authorities than for schools. The IA states that the familiarisation costs include the time taken for a staff member to understand the requirements and explain them to other relevant members of staff. The IA would benefit from providing more detail on the breakdown between the two costs.

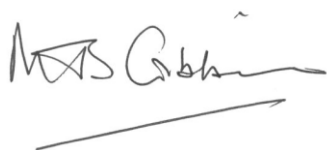
Prior to publication, the Department should ensure that the summary tables, such as the total number of removals and additions in tables 6 and 7, provide consistent information.

### Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net cost to business (EANCB)	£0.67 million
Business net present value	-£6 million
Societal net present value	Not quantified

### RPC assessment

Classification	Qualifying regulatory provision (IN)
EANCB – RPC validated <sup>1</sup>	£0.7 million
Business Impact Target (BIT) Score <sup>1</sup>	£3.5 million
Small and micro business assessment	Not required (low cost regulation)



**Michael Gibbons CBE**, Chairman

<sup>1</sup> For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.