

## DEVELOPMENT PROPOSAL SUBMISSION

### Cover Note

<b>DP No.</b>	DP 729								
<b>School</b>	Balnamore Primary School								
<b>Proposal</b>	To decide on DP 729 that proposes:  <i>“Balnamore Primary School will discontinue with effect from 31 August 2024, or as soon as possible thereafter”.</i>								
<b>Minister’s Decision</b>	Approve with modification to the implementation date  <i>“Balnamore Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter;</i>								
<b>Date of Decision</b>	06 January 2025								
<b>Minister’s Comments</b>	Content								
<b>Additional notes</b>									
<b>Information redacted</b>	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.								
	<table border="1"> <thead> <tr> <th>Key</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>■</td> <td>redaction</td> </tr> <tr> <td>*</td> <td>refers to less than five cases where data is considered sensitive</td> </tr> <tr> <td>#</td> <td>means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure</td> </tr> </tbody> </table>	Key	Details	■	redaction	*	refers to less than five cases where data is considered sensitive	#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure
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**From: Sharon Taylor**  
**Area Planning and Policy Team (Northern Region)**  
**(Cleared by Eamonn Broderick 31 July 2024)**  
**(Cleared by Heather Cousins 19 September 2024)**

**Date: 31 July 2024**

**To: Paul Givan MLA**  
**Minister of Education**  
**Department for Education**

**Copy distribution below**

**DEVELOPMENT PROPOSAL 729 – BALNAMORE PRIMARY SCHOOL**

**Issue:** To decide on Development Proposal (DP) 729 that:-

***“Balnamore Primary School will discontinue with effect from 31 August 2024, or as soon as possible thereafter”.***

**Timescale:** Routine

**Financial/Resource Implications:** Capital  
None

Budget  
Closure may result in an operational saving (unquantified) in terms of recurrent costs.

Accommodation  
It is not anticipated that there will be any accommodation costs to facilitate the closure of Balnamore PS

Staffing  
Teaching and non-teaching staff would be afforded employment protection under the respective School Re-organisation Arrangements and are eligible for re-

deployment under transfer redundancy arrangements. Costs cannot be determined at this stage due to variables involved.

(It is not possible to predict the number of redundancies or redeployments- in advance of a decision; therefore, it is not possible to cost these accurately at this time).

**FOI Implications:**

The contents of this submission are likely to be fully disclosable.

**Statutory Duty Implications**

Rural Needs Act (Northern Ireland) 2016

Article 44 of the Education & Libraries (Northern Ireland) Order 1986

Section 75 (Northern Ireland) Act 1998

**Presentational Issues:**

The proposed closure of the school has generated significant local media, political and stakeholder interest. It is likely that your decision will attract further interest. In the event of any media queries, Press Office will liaise with officials as necessary (Cleared by Press Office)

**Recommendation:**

**It is recommended that you:**

- (i) Approve DP 729 with modification, to discontinue Balnamore Primary School with effect from 31 August 2025, or as soon as possible thereafter;**
- (ii) Ask officials to write to the EA and ask them to develop an area solution to address issues of sustainability and consolidate Controlled provision; and**
- (iii) Agree that this submission (with appropriate redactions) can be made available on the Department's website once the EA and the school has been informed.**

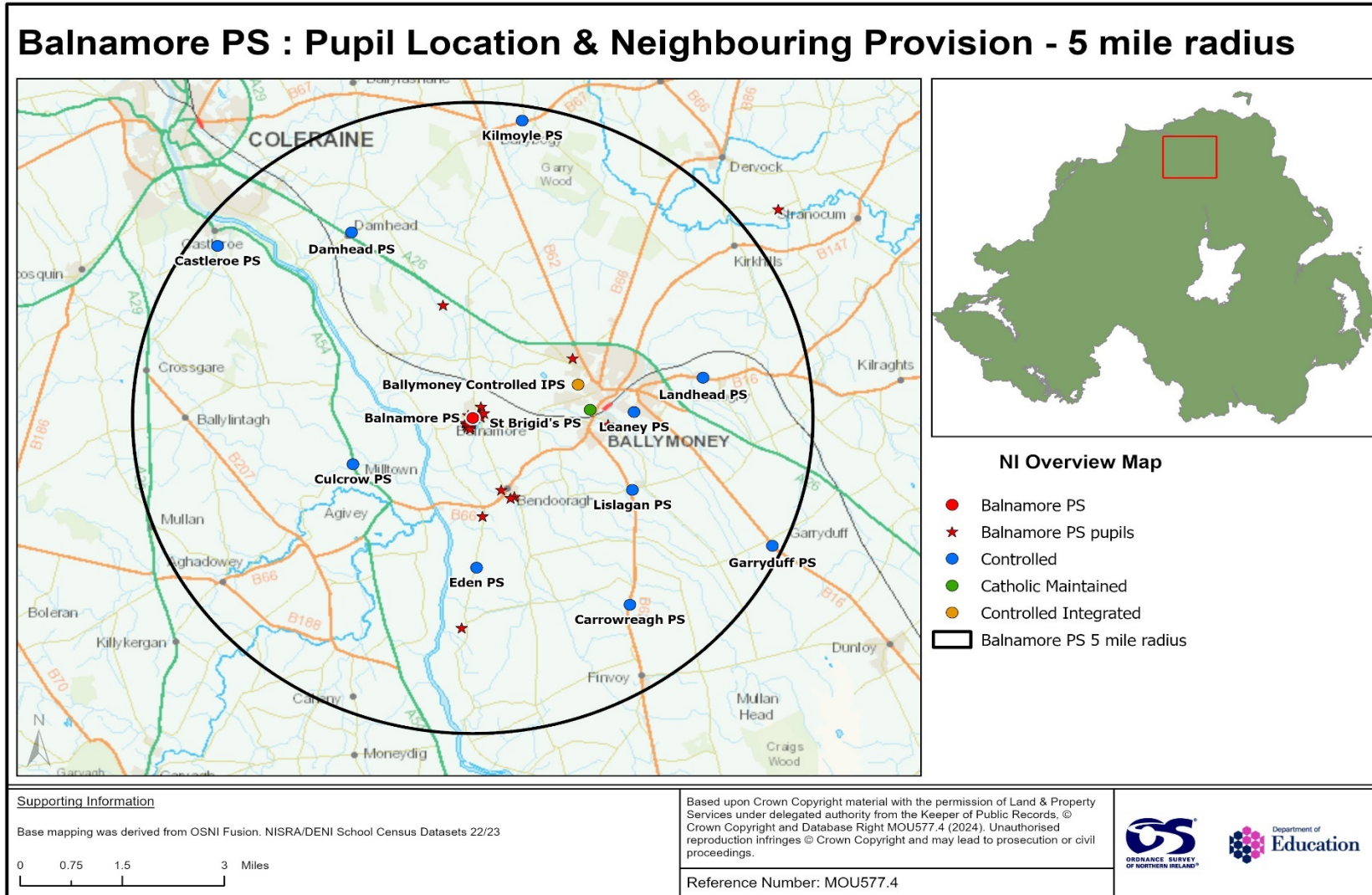
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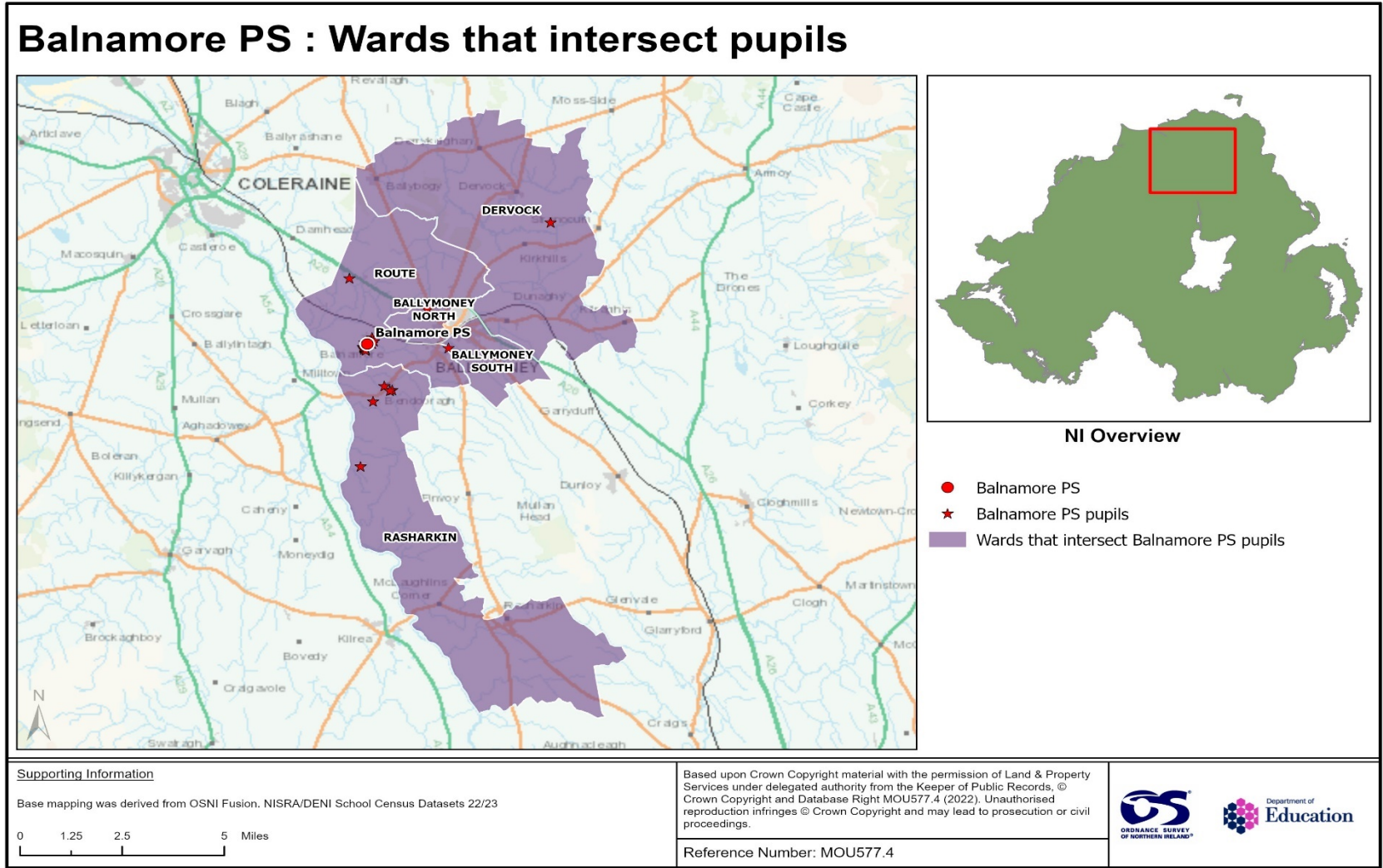
## **APPENDICES**

<b>APPENDIX A</b>	DP 729
<b>APPENDIX B</b>	Case for Change
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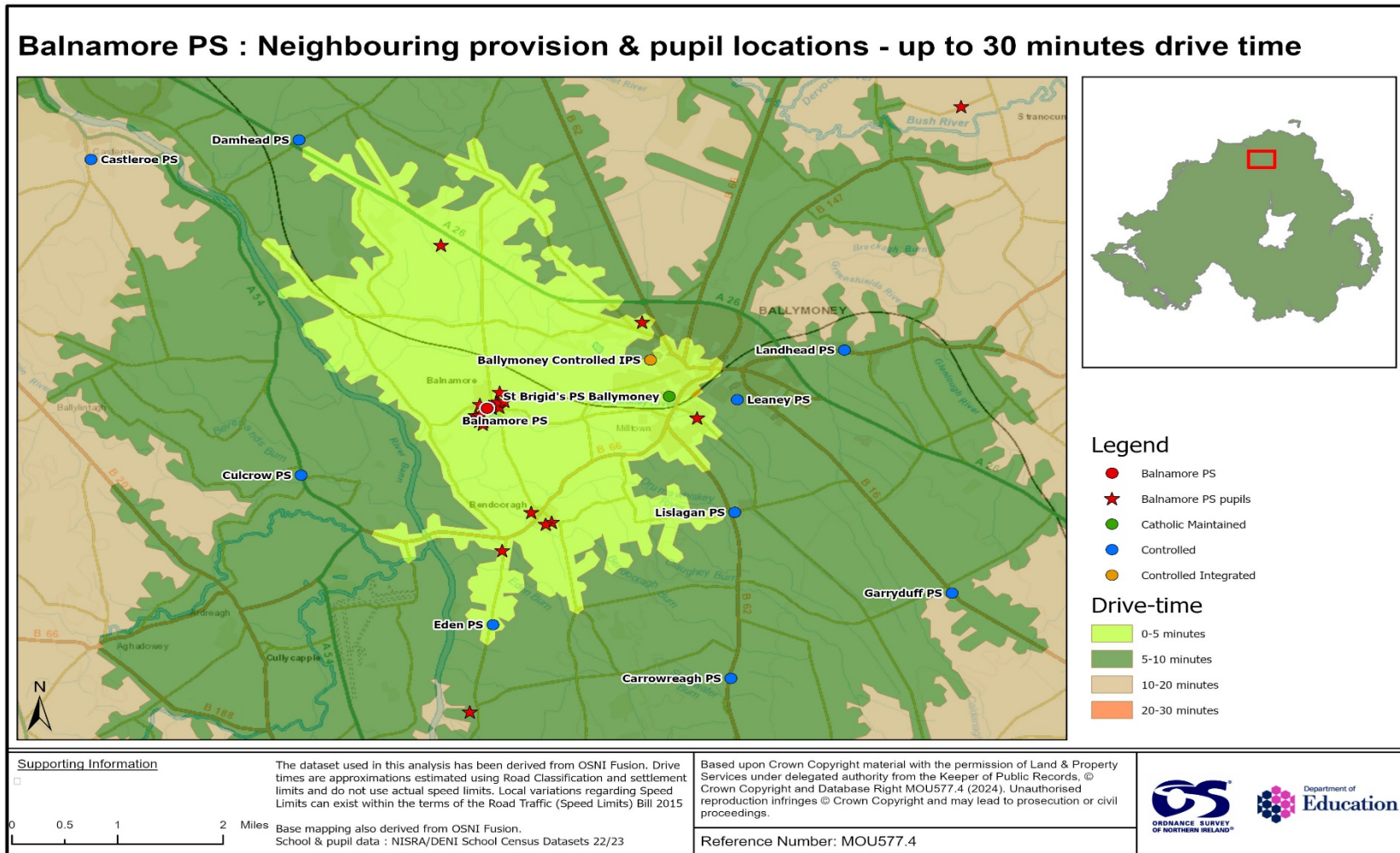
Map 1: Balnamore PS: Pupil Locations and Neighbouring Provision



Map 2 Balnamore PS – Wards that contain pupils



Map 3 – Balnamore PS – Drive time map up to 30 minutes



## Introduction

1. Development Proposal (DP) 729 has been progressed under Article 14 of the Education and Libraries (Northern Ireland) Order 1986. On the 17 January 2024 the Education Authority (EA) as 'the Proposer', published DP 729 relating to Balnamore Primary School (PS) proposing that:-

***“Balnamore Primary School will discontinue with effect from 31 August 2024, or as soon as possible thereafter”.***

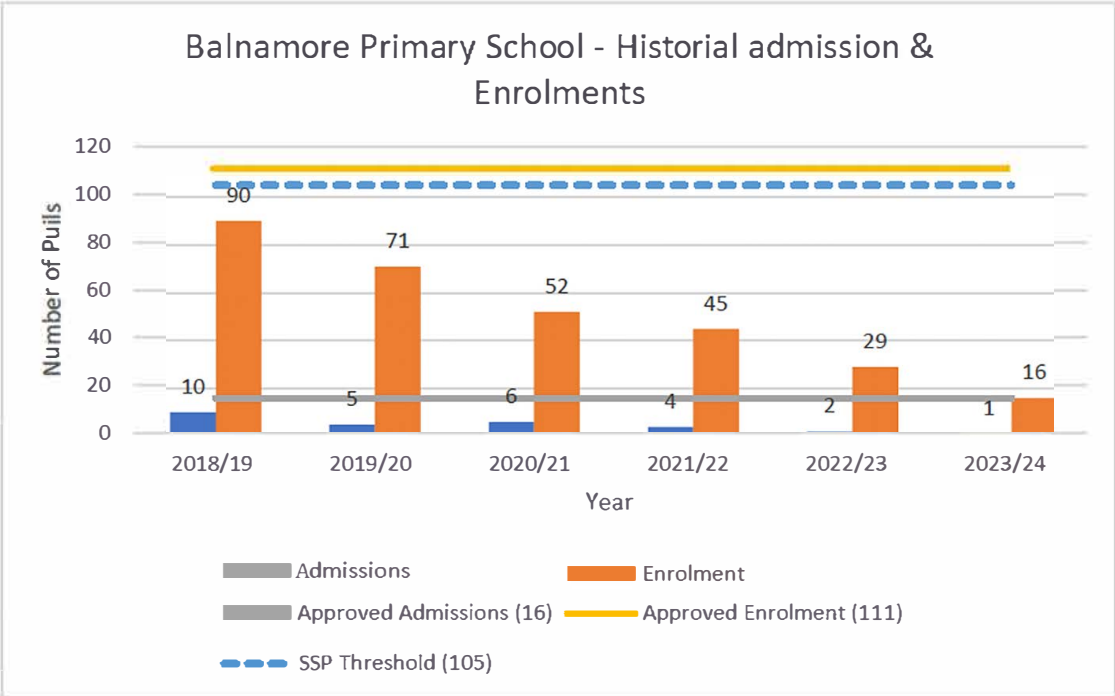
**Map 1** illustrates the location of the school, its pupils' locations and the neighbouring provision within a five-mile mapping radius. **Map 2** illustrates the wards that contain pupils attending Balnamore PS. **Map 3** illustrates a drive time map up to 30 minutes from Balnamore PS.

2. The statutory two-month objection period commenced on the date of publication and concluded on 19 March 2024. A copy of the published proposal and the proposer's supporting Case for Change (CfC) for DP 729 are reproduced respectively at **Appendices A and B**.

## School and Area

3. Balnamore PS is a Controlled primary school situated at 80 Balnamore Road, Ballymoney. It has approved admissions and enrolment numbers of 16 and 111 respectively. **Chart 1** below illustrates Balnamore PS' actual admissions and enrolment trends over the last five years and shows that the school's enrolment number has declined considerably and has fallen to 16 pupils in 2023/24. The school admitted less than its approved admissions number to Year 1 in each of the last five years. Balnamore PS has 97 available places in 2023/24.
4. Balnamore PS' actual admissions and enrolment numbers have been significantly below its approved admissions and enrolment numbers and below the minimum threshold of 105 for a sustainable rural primary school under the Sustainable Schools Policy (SSP).

**Chart 1 – Balnamore PS – Historical Admissions and Enrolment Numbers**



Source: DE Annual Census Return (includes supernumerary and SEN pupils)

- 5. In 2023/24, seven pupils (43.8%) are entitled to Free School Meals (FSM), and [redacted] pupils had a statement of Special Educational Need (SEN).

**Area Context**

- 6. Balnamore PS is located within the Causeway Coast and Glens Local Government District (LGD). On the Northern Ireland Multiple Deprivation Measure 2017, Seacon Super Output area (SOA), within which the school is situated, is ranked 533 out of 890 (1 being most deprived and 890 least deprived).

**Strategic Area Plan (2022-27) & Operational Plan 1 (2022-24)**

- 7. In taking forward Area Planning activity for the next five years, 2022-27, The *Strategic Area Plan 2022-27: Planning for Sustainable Provision* was published by the EA on 29 June 2022. It sets out the strategic direction on how the future educational needs of children and young people will be addressed through area solutions, consistent with relevant policies and Ministerial Priorities. Operational Plan 1 (OP1) was published by the EA on the 1 September 2022 and outlines the area planning activities that will be taken forward in the first two years of the strategic plan (1 September 2022 – 31 August 2024).

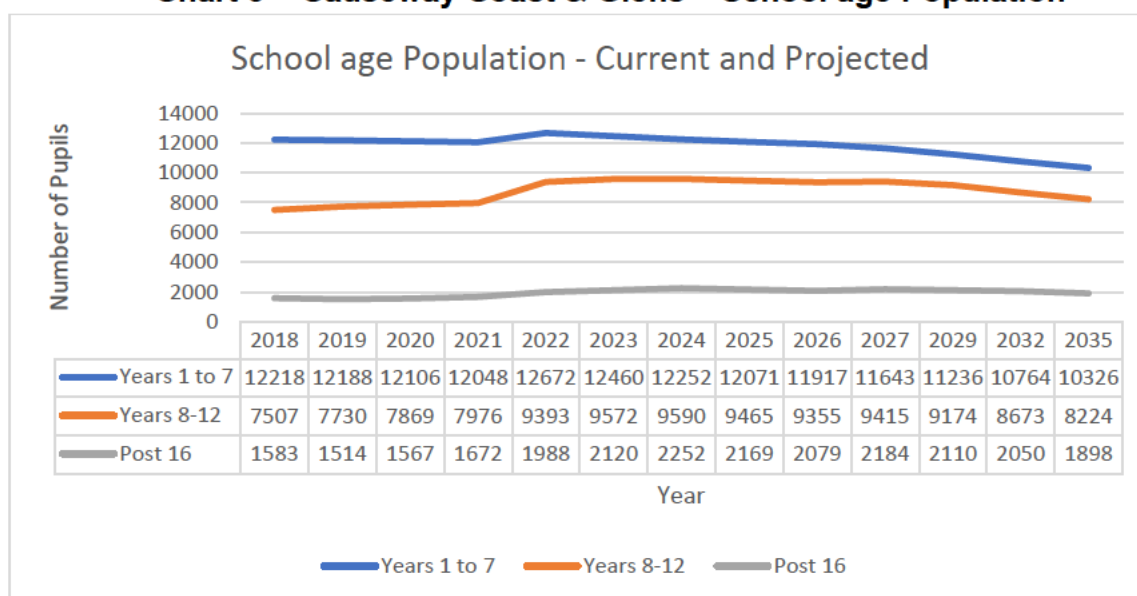
8. This DP for the proposed discontinuance of Balnamore PS, is referenced as a short-term work stream in OP1 with the key theme of “Increase parity of access for all to appropriate pathways, maximise resources and sustainability”.
  
9. OP1 2022-24 includes population projections provided by the Northern Ireland Statistics and Research Agency (NISRA). For the Causeway Coast and Glens LGD, in which the school is located it shows a declining birth trend (**Chart 2**). While **Chart 2** shows the peak and troughs, since 2008, the numbers have fallen from 1772 to 1502 in 2019. This downward trend is projected to continue for primary and post-primary age pupils as presented in **Chart 3**. **Chart 3** shows school age population from 2018 to 2035 and illustrates a reduction in the school age population for Years 1-7 from 12,460 (2023) to 10,326 (2035) representing a 17.1% decline.

**Chart 2 – Causeway Coast & Glens Birth**



Source (NISRA)

**Chart 3 – Causeway Coast & Glens – School age Population**



Source (DE Census Data / NISRA)

## Neighbouring Primary Provision

10. **Table 1** provides a snapshot of neighbouring provision within a five-mile mapping radius of Balnamore PS, detailing the admissions and enrolment data and the latest Education and Training Inspectorate (ETI) inspection assessment of each school. Distances by road may vary from the mapping distance.
11. From September 2022, the urban/rural definitions used in the SSP reflect those used by NISRA<sup>1</sup>, therefore each school in the snapshot has been classified as urban or rural using the NISRA definitions. The SSP recommended minimum enrolment threshold for primary schools is 140 in urban areas and 105 in rural areas.

## Neighbouring Controlled Primary Provision

12. **Table 1 and Map 1** illustrates that there are 10 alternative Controlled primary schools within a five-mile mapping radius of Balnamore PS.
13. In 2023/24, seven of these controlled rural schools had an enrolment below the SSP threshold of 105 (Eden PS (90), Landhead PS (54), Culcrow PS (102), Carrowreagh (83), Garryduff PS (72), Kilmoyle PS (95), and Castleroe PS (92)) and five of those schools had available places. Eden PS is the closest alternative controlled primary school (at 2.8 miles distance) and had approved admissions and enrolment numbers of 15 and 95 respectively and 9 available places.
14. The next available school is Leaney PS (at 3.1 miles) and has and approved admissions and enrolment 46 and 319 with an actual enrolment of 287 for the 2023/24 year and has 42 available places.
15. For 2023/24 the 10 alternative Controlled schools, have a total approved admissions and enrolment of 183 and 1248 and a total of 132 available places.
16. First preference data for 2024/25 at the conclusion of stage 1 of the primary admissions process show Balnamore PS received one first preference application with only one school being oversubscribed, Culcrow PS. In total there were 144 applications for the 199 approved places (including Balnamore PS).

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<sup>1</sup> **Urban:** schools are defined as urban if they are located in settlements with a population greater than or equal to 5,000 people (NISRA Bands A-E); and **Rural:** schools are defined as rural if they are located in settlements with less than 5,000 people (NISRA Bands F-H).

17. In total (including Balnamore PS) for the 2023/24 academic year there are 1359 approved enrolment places in Controlled schools with an actual enrolment of 1204 resulting in 229 available places in the area (97 of these were at Balnamore PS).

### **Alternative Integrated Provision**

18. **Table 1** illustrates there is one Integrated primary school (Ballymoney Model Integrated PS) within a five-mile radius of Balnamore PS. The school is located 2.3 miles away from Balnamore PS and has an approved admissions and enrolment of 59 and 414 respectively. In 2023/24 the school admitted 45 pupils into Year 1 and had an actual enrolment 363 pupils with 70 available places. The school's enrolment is significantly above the SSP threshold for a sustainable urban primary school.
19. First preference data for 2024/25 at the conclusion of stage 1 of the primary admissions process show the school received 36 applications for the 59 approved places.

### **Alternative Catholic Maintained Provision**

20. **Table 1** illustrates there is one Catholic Maintained primary school (St Brigid's PS) within a five-mile radius of Balnamore PS. The school is located 2.1 miles away from Balnamore PS and has an approved admissions and enrolment of 30 and 210 respectively. In 2023/24 the school admitted 25 pupils into Year 1 and had an actual enrolment 209 pupils with 33 available places. The school's enrolment is significantly above the SSP threshold for a sustainable urban primary school.
21. First preference data for 2024/25 at the conclusion of stage 1 of the primary admissions process show the school received 25 applications for the 30 approved places.

### **Summary of Provision**

22. Across the 13 primary schools (including Balnamore PS), in 2023/24 there were 1776 pupils enrolled for a total of 1983 approved places. This resulted in 332 available places.
23. There were 231 Year 1 pupils enrolled for the 288 approved Year 1 places.
24. There are six schools with an approved enrolment number set below the recommended minimum SSP threshold of 105; all of which are Controlled

schools (Eden PS, Landhead PS, Culcrow PS, Carrowreagh PS, Garryduff PS and Castleroe PS).

25. In 2023/24 eight of the schools have actual enrolments below the recommended minimum SSP enrolment number (105), all of which are Controlled.

**Table 1 – Snapshot Of Neighbouring Provision**

Balnamore Primary School - All Primary School Provision - 5 mile radius														
School Ref No	School Name and Postcode	Urban / Rural	Distance in Miles by Road - Google maps	2023/24 & 2024/25 Approved Enrolment Number	2021/22 Actual Enrolment (Includes supernumerary pupils)	2022/23 Actual Enrolment (Includes supernumerary pupils)	2023/24 Actual Enrolment (includes supernumerary pupils)	2023/24 Supernumerary Pupils	2023/24 Available Places	2023/24 Actual Y1 Admissions (includes supernumerary pupils)	2023/24 & 2024/25 Approved Admissions Number	2024/25 Total First Preference Applications Stage 1	2024/25 Over/Under Subscribed at First Preference Stage 1	ETI reports publication date / Overall assessment
<b>Controlled</b>														
3016447	Balnamore PS, Ballymoney, BT53 7PT	Rural	-	111	45	29	16	*	97	1	16	1	U-15	Nov 2019 - ASOS Focused Inspection - Apr 2011 - Good
3010796	Eden PS, Ballymoney, BT53 7PB	Rural	2.8	95	83	86	90	*	9	13	15	14	U-1	Mar 2018 - Sustaining Improvement Inspection - ASOS Mar 2015 - Follow-up Inspection - Good
3013325	Leaney PS, Ballymoney, BT53 7AL	Urban	3.1	319	306	299	287	10	42	31	46	30	U-16	Apr 2019 - Sustaining Improvement Inspection - ASOS May 2016 - capacity to identify and bring about improvement in the interest of all the learners.
3010787	Lislagan PS, Ballymoney, BT53 7JF	Rural	3.2	109	116	116	109	6	6	10	16	12	U-4	Jun 2022 - Follow-up Inspection - Lislagan PS now demonstrates the capacity to identify & bring about improvement. Jun 2017 - Follow-up Inspection - ASOS

3010795	Landhead PS, Ballymoney, BT53 7HL	Rural	3.9	60	60	58	54	*	6	5	9	5	U-4	Jan 2019 - ASOS Dec 2012 - Follow-up Inspection - Good
3012225	Damhead PS, Coleraine, BT52 1UF	Rural	3.9	203	197	204	204	5	4	30	29	27	U-2	Apr 2018 - ASOS Jun 11 - Follow-up Inspection - Good
3012065	Culcrow PS, Coleraine, BT51 4BT	Rural	4.1	77	111	98	102	*	0	20	11	13	O-2	Mar 2019 - ASOS May 2012 - Good
<b>School Ref No</b>	<b>School Name and Postcode</b>	<b>Urban / Rural</b>	<b>Distance in Miles by Road - Google maps</b>	<b>2023/24 &amp; 2024/25 Approved Enrolment Number</b>	<b>2021/22 Actual Enrolment (Includes supernumerary pupils)</b>	<b>2022/23 Actual Enrolment (Includes supernumerary pupils)</b>	<b>2023/24 Actual Enrolment (includes supernumerary pupils)</b>	<b>2023/24 Supernumerary Pupils</b>	<b>2023/24 Available Places</b>	<b>2023/24 Actual Y1 Admissions (includes supernumerary pupils)</b>	<b>2023/24 &amp; 2024/25 Approved Admissions Number</b>	<b>2024/25 Total First Preference Applications Stage 1</b>	<b>2024/25 Over/Under Subscribed at First Preference Stage 1</b>	<b>ETI reports publication date / Overall assessment</b>
3010572	Carrowreagh PS, Ballymoney, BT53 7JL	Rural	4.9	102	81	82	83	*	16	12	15	9	U-6	Nov 2018 - ASOS May 2012 - Short Inspection - Good
3010594	Garryduff PS, Ballymoney, BT53 7DR	Rural	6.1	70	77	77	72	*	0	4	10	8	U-2	Feb 2019 - Sustaining Improvement Inspection - ASOS Mar 2007 - Focused Inspection - The school has major strengths in its educational provision
3010878	Kilmoyle PS, Ballymoney, BT53 6NS	Rural	6.4	115	70	83	95	8	28	18	18	12	U-6	Oct 2017 - Sustaining Improvement Inspection - ASOS Mar 2014 - Good
3012288	Castleroe PS, Coleraine, BT51 3RN	Rural	8.1	98	103	96	92	15	21	17	14	13	U-1	Apr 2018 - Sustaining Improvement Inspection - ASOS Oct 2010 - Short

														Inspection - Outstanding
Sub total				1359	1249	1228	1204	56	229	161	199	144		
<b>Integrated</b>														
3050866	Ballymoney Model IPS, BT53 6BW	Urban	2.3	414	403	376	363	19	70	45	59	36	U-23	May 2018 - Sustaining Improvement Inspection - ASOS May 2015 - Good
Sub total				414	403	376	363	19	70	45	59	36		
<b>Catholic Maintained</b>														
3033326	St Brigid's PS Ballymoney, BT53 6JX	Urban	2.1	210	196	194	209	32	33	25	30	25	U-5	Sep 2013 - Very good
Sub total				210	196	194	209	32	33	25	30	25		
Grand total				1983	1848	1798	1776	107	332	231	288	205		

#### ASOS - Action Short of Strike

The actual enrolment and admissions numbers include supernumerary pupils, however, exclude reception pupils (as per annual Census information).

1st Pref. applications exclude reception & statemented pupils. 1st pref. applications as at 5.2.24 (start of the primary admissions process for the 2024/25 school year), provided by the EA Primary Admissions Office.

Carrowreagh PS had 3 reception age pupils in 2020/21, 4 in 2021/22 & 6 in 2023/24 school years

Carrowreagh PS has 6 reception age 1st prefs for the 2023/24 school year, info provided by the EA Primary Admissions Office 26.04.23

## **CASE FOR CHANGE (CfC)**

26. The CfC sets out the EA's rationale for the proposed closure of Balnamore PS. Key assertions are as follows:-

- Balnamore Primary School has seen a significant downturn in enrolment numbers particularly over the last three years not exceeding 50 pupils.
- The school was identified in the Strategic Area Plan 2022-27: Planning for Sustainable Provision and Operational Plan 1 2022-24 with an action for Balnamore Primary School '*The Education Authority is and will continue to engage with the Board of Governors on area planning options and future sustainability.*'
- The low enrolment numbers will continue to place increased pressure on the already strained financial resources of the school and also on the teaching staff.
- The proposal will meet the outcomes for all, including additional support to those who require it, ensuring those children with Special Educational Needs realise their full potential.
- Balnamore Primary School has a declining enrolment and has a Full Time Equivalent (FTE) of 3.4 teachers. This means that resources available to the school are also declining.
- In order to implement the Northern Ireland Curriculum, a school should have, in each year group, sufficient pupils to ensure appropriate personal development and mutual understanding between children. Where a school has a falling enrolment, it can be challenging to attract sufficient resources to ensure a high-quality educational experience.
- Balnamore Primary School operates four composite year groups in a single classroom and three composite year groups in the other single classroom which does not meet SSP requirements.

## **Alternative Options**

27. The CfC details the following alternative options that the EA explored with stakeholders:-

- Do Nothing
- Shared Education
- Transformation to Integrated Status
- Amalgamation
- Federation
- Discontinue

28. The CfC states that *'In considering the future of Balnamore Primary School, all other options for the school did not provide for a sustainable provision for the school'*.
29. The CfC highlights there are alternative Controlled primary schools in the area with available places. It also acknowledges *"there was disappointment that the work of the governors could not provide a sustainable solution for the school. Governors put forward proposals to promote the school, however, as current enrolment trends do not project an upturn in numbers, sustainability is difficult. The Education Authority recognises the commitment of the governors, but the current circumstances would not provide for sustainable provision for pupils currently attending Balnamore Primary School"*.
30. In consideration of the option explored "The EA recommended that the school discontinues with effect from 31 August 2024, or as soon as possible thereafter".
31. Following consideration of all consultation feedback received, including a deputation on behalf of Balnamore PS (stating their case, explaining what had caused the decline in enrolment at the school), and having reviewed the options available, the EA's Strategic Planning and Policy Committee<sup>2</sup> (SPPC) discussed the proposal on 9 January 2024, and it was agreed to publish DP 729.
32. The CfC for DP 729 is reproduced in full at **Appendix B**.

## **STATUTORY DP PROCESSES**

### **Pre-publication Consultation**

33. The CfC advises that the EA undertook pre-publication consultation from 12 September 2023 to 14 November 2023. Staff, governors and parents/guardians of Balnamore Primary School were notified of the launch of the pre-publication consultation with the publication of a suite of documents on the EA's website on 12 September 2023. Staff, governors and parents/guardians were invited to attend virtual pre-publication consultation meetings on:-
  - Board of Governors: 13 September 2023 (9 attendees in total - 7 BoG members, Associate Principal, and CSSC representative)
  - Staff: 14 September 2023 (11 attendees in total – 9 members of staff and a representative from UTU and CSSC)
  - Parents/Guardians: 14 September 2023 (17 attendees in total – 15 parents, Associate Principal Stephen Mulligan and CSSC representative)

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<sup>2</sup> [Strategic Planning & Policy Committee Minutes | Education Authority Northern Ireland \(eani.org.uk\)](https://eani.org.uk)

34. In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986 the EA, before submitting a proposal to the Department, is obliged to consult with the BoG, teachers and parents/guardians of any school or schools which would, in the opinion of the EA, be affected by the proposal. A total of 25 local schools which might be affected by the proposal were forwarded correspondence, but no responses were received.
35. The EA received a total of 64 responses with 61 objecting to the proposal, two in support of the proposal and one from the Controlled Schools' Support Council (CSSC) which neither agrees nor disagrees.

Respondent	Agree	Disagree	Neither agree nor disagree	Total
Board of Governors – Balnamore PS		1		1
Governors – Balnamore PS		3		3
Teaching and Non-Teaching Staff – Balnamore PS		7		7
Parents and Guardians – Balnamore PS	1	15		16
Political Representatives		2		2
Other - including past pupils and Balnamore Community	1	33		34
Controlled Schools' Support Council			1	1
<b>Total</b>	<b>2</b>	<b>61</b>	<b>1</b>	<b>64</b>

36. A summary of the responses is set out in the CfC at **Appendix B**, some of the key issues raised are: -

*In Support of Proposal–*

- No comments made.

*Do not support the Proposal*

- Balnamore PS is the heart of a community and closure of the school would be a social disaster for the community;
- Strongly believe that the school has been failed by the Board of Governors and the Education Authority who have a duty to monitor and support the school;
- The quality of teaching is excellent and current pupils are obtaining an outstanding education;
- The recent appointment of a Principal, who has 'steadied the ship', should be given longer than a year to grow the school;

- All children are included and provided with a warm, welcoming and nurturing environment, allowing children of all abilities including special needs to thrive;
  - Pupils will not have a local school ‘on their doorstep’;
  - The main reasons why parents have not chosen to send their children to Balnamore PS are the historic school issues and the recent announcement by the Education Authority of its plan to close the school in August 2024;
  - Many of the factors at the heart of this development proposal – such as pressures on the school budget and the residual impact of composite classes - are not unique to Balnamore PS;
  - Live Births for the locality clearly show sufficient growth to indicate the need for a local primary school positioned in the heart of the village;
  - The decision appears to conflict the rural school’s policy which is specifically designed to promote and protect schools in rural areas;
  - this is a cost cutting exercise and the thoughts/views/ feelings of the village community have not been considered; and
  - The Education Authority has a moral duty to grant a five-year reprieve by way of an attempted remedy.
37. The CfC states that the CSSC “notes the decline in population in the area within which Balnamore PS is situated and the impact this had had on the enrolment of the school” and “acknowledges that it has not been possible to identify a sustainable solution for the school”.

### **Equality Impact Assessment**

38. The Department’s guidance on Development Proposals requires Equality screening to be carried out by the proposer at the earliest possible stage. The CfC confirms that Equality screening and statutory requirements of the Rural Needs Act (Northern Ireland) 2016 (where appropriate) have been considered.
39. 10 of the responses commented on Section 75 issues. The EA asserts that these comments and all responses have been taken into account when assessing the equality impact of the proposal. A copy of the Equality Screening Template prepared by the EA is attached at **Appendix I**. The screening determines that there will be minor impact and states “*The EA will work with parents and the school to mitigate any factors which they consider disadvantage the pupils e.g.in securing admission to a suitable school; the provision of transport and uniform support in accordance with current policies and induction support for pupils who may find the change of school a challenging experience*”.

## **EA Comments**

40. The Education Authority, as the proposer, supports Development Proposal 729 to discontinue Balnamore Primary School with effect from 31 August 2024, or as soon as possible thereafter.
41. Pre-publication consultation was undertaken with governors, staff and parents/guardians outlining the Education Authority's Case for Change detailing the rationale for the proposal. During the pre-publication consultations undertaken with staff, governors, parents/guardians the following recurring themes emerged: -
- Children with Special Education Needs;
  - Health and Wellbeing;
  - Quality of Education;
  - Historical Issues;
  - Transport;
  - Rural Needs Act;
  - Consideration of other options; and
  - Impact on the local community
42. The EA states that it *“recognises the important role Balnamore Primary School plays in the community and its close links with the community, in proposing the school’s closure, the Education Authority seeks to strengthen controlled primary provision in the area”, and “should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department of Education to ensure that pupils affected by the proposal be accommodated, where possible and within current guidance/ policies. Area Planning officers will work with Balnamore Primary School and receiver primary schools to support pupils, parents and school through the transition.”*

## **Two-Month Statutory Objection Period**

43. The two-month statutory objection period for DP 720 commenced on 17 January 2023 and concluded on 19 March 2024.
44. There were 666 objections received during the two-month statutory objection period in relation to the proposal. There were 28 duplicate responses and copies of three letters also included. There were no responses in support of the proposal.

45. Due to the number of objections received it is not possible to provide these in full in the submission, however a summary of the responses is attached at **Appendix F**. Copies of all correspondence will be provided to you.
46. Of the 666 responses submitted, 260 of these were a templated response under the title "Save our school" which allowed the respondents to enter why they thought Balnamore PS should be saved.
47. 390 responses were also a templated response. It asked the question "Balnamore Primary School should remain open in the village because:" and provided five options for respondents to choose. These options are detailed below and all respondents ticked all options.
- It will safeguard the future of our growing village, children, families, property values, bus routes etc.
  - It provides quality education for today's children and the children of tomorrow.
  - It will remain an intergenerational rural community and we need the school to stay as the heartbeat of the Balnamore community.
  - It will avoid the site becoming a wasteland and vandalised.
  - Closure is wrong. The EA wants to close the school when it has not had the fair chance it deserves to rebuild.
48. The remaining responses were submitted by individuals, The Balnamore Community Association Group, Balnamore PS Community Support Group and there was a submission from the school's BoG. Ms Sian Mulholland MLA for the Alliance Party also submitted correspondence in objection to the DP. Below is a summary breakdown of the main themes expressed throughout the responses and a summary of each of the submissions submitted by the community group, support group and BoG.
49. The main themes highlighted throughout the templated responses were:-
- The decline in numbers is a result of mismanagement by the leaders of the school and having seven principals in the last six years;
  - The EA did not step in soon enough to provide support and direction to the issues that the school was experiencing;
  - The school is the heart of the community, and that the community is growing and experienced a growth in housing;
  - The closure of the school will result in children having to travel further, increased transport costs for families to access the next available schools which will increase the carbon footprint and straining the local environment;

- Some families in the area do not have access to cars and will cause unnecessary disruption to them in trying to access other local schools;
- The school has fantastic facilities with a “state-of-the-art” sensory room, in modern and fit for purpose buildings;
- The school has not had the chance to rebuild and should be given a period of three to five years to reach sustainability;
- This is a cost cutting exercise for the EA and they already have made the decision to close the school;
- The staff are friendly, supportive and cater for the needs of all pupils; and
- The EA refused to meet face to face which hindered meaningful communication and the views that were raised by the community were unheard.

### **Balnamore Community Association Group**

50. The submission from the Balnamore Community Association included the objection responses that were submitted to the EA for the pre-consultation response. It is also a templated response which asked five questions to which respondents could provide answers to. The questions asked were:-

- What is your affiliation to the school?
- What does Balnamore Primary School mean to you?
- How do you feel knowing the EA want the school to close by August 24?
- Do you feel the school has been heard by the EA or given a chance to rebuild?
- What do you feel would happen to the village if the school was to close?

51. Many of the responses were similar in nature as those already raised. The key issues raised are summarised below:-

- The school is heart of the community, and many people have historical connections to the school;
- The village is growing and there is new housing developments being built in the village;
- The school caters for all, is inclusive, has supportive staff and provides quality education;
- The decline in numbers at the school was caused by leadership issues, failure of the EA to support the school;
- The school deserves time to rebuild;
- It is important for families to have access to a rural school, as many families in the area do not have access to a car. As a result, there will be increased costs for families having to travel further increasing fuel consumption, adding to the carbon footprint and staining the local environment;

- The EA refused to meet face to face and conducted meeting virtually which hindered communication, and lead to a sense of being unheard;
- This is cost cutting exercise by the EA; and
- The school has fantastic facilities and if it is to close, it would be left derelict and will be vandalised

### **Balnamore PS Support Group Submission**

52. The Balnamore PS Support Group submitted a dossier of evidence to the Minister to ask him to keep the school open, to allow the carefully considered plans for regrowth to rebuild the number of pupils enrolled at the school.
53. The dossier details the timeline for the decline in pupil numbers at the school, along with the frequency of leadership changes and the instability it caused. It offers information about the financial position of the school and accepts *“the evidence from Complaints Procedures which indicate that unresolved parent and staff concerns have significantly contributed to the decline in the school over an extended period of time”* and that it was in this vacuum the support group emerged.
54. It highlights one of the key objectives for the way forward is stability in leadership and details that the school needs:-
- A period of time to appoint a Principal to lead and guide the school to sustainable levels;
  - a re-constituted Board of Governors, energised to support the Principal and the school towards this vision; and
  - a radical cultural change at all levels and the consistent implementation of shared and agreed values.
55. A second key objective identified was the establishment of pre-school provision at the school. It states *“through the generous support of a private donor, Balnamore school has received funding to subsidise the running of the nursery school for the academic year 2024/2025. This remarkable contribution enables us to offer fully funded nursery school places for children aged 3 and 4, who are due to start school in September 2025. This initiative is a significant step towards realizing our vision of providing accessible and high-quality early childhood education to families in our community.”*
56. The dossier also identifies another key objective in moving forward is the development of the use of the school’s sensory room. The proposal is to support children with additional needs in the Ballymoney and Coleraine area by establishing *“Sensory Room Sessions for Kids.”*

57. It asserts that these proposals have the potential to arrest decline and begin the process of re-building the enrolment of Balnamore PS. It also details the school's premises and the "state-of-the-art" facilities in which the school boasts, from outside play facilities, safe parking, the enriched and inclusive curriculum for all and that the school has the support of an ever expanding community.
58. It is noted in the dossier that the Balnamore Community Association has created a subcommittee which includes a number of locally elected representatives and BoG representatives. The dossier asserts that the *"Balnamore Community Association have also established a well-attended Parent and Tot group which runs out of the school every Tuesday"* It states that *"in its infancy the group averaged 17 children weekly, with some of them now attending Pre-School in the neighbouring town and data from a survey showed that parents were expecting to send 15 of these children to Balnamore Primary School. The age of these children ranges from 2 to 4yrs old."* The Department notes that the age range of these children is not of primary school age and first preference data from the EA at the conclusion of stage one of the admission process details that only one first preference application has been received by the school.
59. The dossier asserts that there is need for a culture change at the school given the historical issues that have been faced and plans to implement a *"Culture change Programme"*. It concludes from a survey conducted in February 2024 of 55 homes showed overwhelmingly support the continuance of the school and the support group is committed to working with all stakeholders to achieve the goal of keeping the school open.
60. The Balnamore PS Support Group Submission is reproduced in full at **Appendix F**.

### **Board of Governor Submission**

61. The BoG of Balnamore PS submitted a submission (**Appendix F**) to the Department and the Minister in which it highlights the key points of objection to the proposed closure of Balnamore PS. Its aim is to offer clarity surrounding the circumstances of decline at the school, offer up to date information in relation to live births and new housing developments in the area as the BoG feel *"that the EA's case for change does not take the wider viewpoint of the community impact particularly as a rural area."*
62. The submission details similar points already covered in the other responses and are summarised below:
  - There has been housing growth in the village of 240% since 1990;

- The EA, as the Employing Authority, has not planned for or managed issues relating to the sustainability of the school;
- The school is in the advanced stages of launching nursery age provision in the school to provide care and educational experience for local pre-school children;
- The truth of the decline in enrolment has been well documented and is a key component in the EA's arsenal for closure;
- The frequency of leadership changes has impacted the stability, direction, and capacity of the school to deliver sustained improvement and has contributed to the diminishing pupil numbers in the school and a high level of complaints;
- The EA has breached core areas of responsibility by not providing clear support or active interventions to assist the school.

63. The submission details that the school has not declined because there are no children in the area, the building is unfit for purpose, other schools in the area are more popular or other schools in the area have better facilities but recognises the exodus of children was caused by:

- Individuals - Instability in leadership (sickness, absence, multiple appointments, complaints)
- Individuals – Parental complaints
- Collective – Board of Governors (Response to Parental Complaints)
- Collective – Board of Governors (Instability in Leadership)
- System – Education Authority (External view of progress and Active interventions)

64. The submission details the frequency of leadership changes from 2017 -2023, along with the decline in enrolment numbers. It asserts that the diminishing pupil number at the school has been caused by this instability in leadership, the high number of complaints received, and that the EA has clearly breached core areas of responsibility under Every School A Good School (ESAGS) Policy.

65. The submission states that “Where a need for significant improvement is identified and EA considers that the school is not capable of implementing the necessary change, on a graduated basis the EA will be empowered to implement a range of actions: -

- This requires EA to identify high quality support, particularly in relation to training and resources that help governors, principal and teachers to take forward improvement.
- EA will be responsible for monitoring the performance of individual schools, particularly the standards of attainment; for challenging schools

about their performance where it is clearly declining or where ETI identifies weaknesses; providing the necessary support to schools seeking to improve.

- EA will be accountable to DE for the effectiveness of the discharge of these responsibilities.

66. The Department notes that no such improvements were identified in the latest ETI inspection report of November 2019 as it was affected by Action Short of Strike (ASOS) and concluded with *“owing to the impact of the action short of strike being taken by the staff, the ETI is unable to assure parents/carers, the wider school community and stakeholders of the quality of education being provided for the children. The school is a high priority for future inspection with no further notice.”*
67. The submission concludes that the proposal to discontinue the school is a *“short sighted option”* and *“does not take the wider viewpoint of community impact particularly as a rural area. This includes both the societal and future needs of the village and its surrounding areas demonstrated by the recent growth of the population due to new housing development within walking distance of the school.”*
68. It is evident from reading the letters objecting to this proposal that there is a high level of support from the local community to keep Balnamore PS open. Those responding testify to the high quality of the educational experience on offer and delivered in the school together with “state of the art” facilities being offered by the school. The community are critical of the EA, in that they feel let down, unheard and unsupported through this difficult time. They are also critical of the EA of bringing forward such a proposal when it is clear they feel the decline in number did not occur naturally and was the result of instability in leadership at the school in which they feel the EA did not intervene quick enough and in the correct manner to provide the necessary support.
69. The Board of Governor’s submission is reproduced in full at **Appendix F**.

#### **CORR-1041-2024 Sian Mulholland MLA – Closure of Balnamore PS**

70. On the 7 February Ms Sian Mulholland MLA, wrote to you regarding DP 729. In her correspondence it was requested that you reconsider reviewing this process and pausing its outcome for a period to offer the school an opportunity to bed in initiatives and grow the school community again.
71. Ms Mulholland asserted that the school is an integral part of this rural community, providing quality education and explains that, *“over the last number of years, the school has faced a period of turbulence stemming from a series of leadership*

*changes, issues and subsequent insufficient support from the Education Authority” and these issues have been, “beyond the control of the school community and have had a detrimental impact on the school’s overall numbers and therefore stability.”*

72. She noted that those associated with the school have taken proactive measures to address the challenges faced by the school to increase pupil numbers which demonstrates the commitment to the long-term success and sustainability of the school by the Board of Governors and parents.
73. She also asserts that for these initiatives to take root and to be firmly established, the school requires a period of stability lasting at least two years and has kindly requested that you reconsider the closure process to allow the school the opportunity to stabilise and thrive.
74. Ms Mulholland asserted that she understands the complexities involved in such decisions, and in particular the criteria outlined in the Department’s Sustainable Schools Policy of 2009 but believes that granting Balnamore Primary School a reprieve from closure is a just and fair course of action.
75. A full copy of **CORR 1041-2024** is available at **Appendix G**.

#### **Response From Controlled Schools’ Support Council (CSSC)**

76. One of the letters of response was from the CSSC. This is set out in full at **Appendix C**. The key points raised are as follows: -
  - CSSC has taken account of the Ministerial statement on 9 August 2021 outlining area planning priorities and notes the decline in population in the area within which Balnamore Primary School is situated and the impact this has had on the enrolment of the school. Taking account of the Sustainable Schools Policy, the challenges presenting for the Governors and staff of Balnamore Primary School are significant.
  - CSSC would seek assurance that arrangements will be expedited to facilitate the enrolment of displaced pupils to minimise uncertainty.
  - CSSC acknowledges that it has not been possible to identify a sustainable solution for Balnamore Primary School, hence the Education Authority’s proposal and the contribution Balnamore Primary School has made over many years to the generations of pupils who have attended the school and to the wider community it serves.

- CSSC would welcome timely consideration of this proposal to avoid disruption to the pupils' education and to minimise uncertainty for staff and parents.

**INV 1137-2024 - Meeting with Ian Paisley MP and Mervyn Storey Councillor for Causeway Coast & Glens – Education Provision in Ballycastle and Balnamore PS.**

77. During the statutory objection Ian Paisley MP and Mervyn Storey Councillor for Causeway Coast and Glens requested to meet the Minister to discuss education provision in the Ballycastle Area and to discuss concerns relating to the proposed closure of Balnamore PS.
78. On the 28 March 2024, the Minister met with Mr Paisley and Mr Storey at Parliament Buildings. Several issues were discussed in relation to education provision in Ballycastle and there was a representation made in relation to the proposed closure of Balnamore PS. A note of the meeting relating to the representation made is included at **Appendix H**.
79. The representation highlighted that the new principal has tried to get through the long list of issues and has made some progress to date and that geographically Balnamore needs to have a school in the area as housing developments in the area are growing.
80. It was highlighted that the school had an “exceptional” head mistress and upon her retirement the school has “gone downhill” and the history of the school has gone against it causing parents in the area to choose other schools.
81. It was requested that the school should be given a period of time to get back on its feet, due to being run down by bad decision making and instability in leadership. Aspects of the school were highlighted including the recent addition of a sensory room, the excellent catering facilities, which caters for other schools in the area providing breakfast clubs and after school’s clubs and that the buildings at the school are exceptional and it should not be closed.
82. It was pointed out (at the meeting) that if the school was to close there may be future opportunities in the area for other schools to be amalgamated and located in the school given the outstanding facilities already in existence as other schools in the area are too small, don’t have space for a library or have portacabins.
83. Mr Paisley also asserted that there is the opportunity of having pre-school provision at the school due to the number of children in the area, which would help attract pupils back to the school.

84. An invitation was extended to the Minister to visit the school to see the facilities and the work the principal has done to date. It was commented that the school is well supported by the local community and that it just needs a chance to be given a period of time to create some stability in which case the parents would choose the school again but because of the uncertainty of the school this has further contributed to the declining numbers at the school.
85. Mr Storey commented that the school should not have been allowed to get to this situation and to allow the school to descend into chaos for such a period of time was a dereliction of duty of EA / CSSC and DE and there is a lesson to be learned as to how we deal with crisis in the schools.
86. Mr Storey also commented that he would like a favourable decision for the school but if this cannot be the case, the school should be used for a purpose and not left abandoned as the facilities are excellent. It was suggested that the school could be used for SEN purposes given the needs that are arising for children with special needs. Mr Storey acknowledged that the school must go through the process but wishes to have a plan B for the school which has a definitive plan for it to be preserved in the area which could alleviate some of the current pressures being experienced in special educational needs in schools.
87. The meeting concluded with a summary of the points that are available to the Minister for consideration and a discussion about the provision in the surrounding area needing further consolidation.

## **SUSTAINABILITY ASSESSMENT**

88. The Department's SSP sets out six criteria supported by quantitative and qualitative indicators which provide the framework for consideration of a school's longer-term sustainability. The primary objective of the policy is to ensure that all children and young people receive a high-quality education in schools that are educationally and financially viable in the longer term. The following is an assessment of Balnamore PS against the six sustainability criteria and their associated indicators. The Annual Area Plan for Balnamore PS is attached at **Appendix J**. There are neither formula nor weightings attached to the criteria or indicators.

### ***Criterion 1: Quality Educational Experience***

89. The ETI carried out an inspection of Balnamore PS in November 2019, although now dated. However, this was impacted by Action Short of Strike (ASOS) and the ETI was therefore unable to evaluate fully the quality of education provided. The report stated "A group of year 6 children spoke positively about their learning across the curriculum and the support they receive from their teachers. They

value the range of extra-curricular activities provided and the opportunities they have to take on roles of responsibility as members of the school and eco-councils and as ‘digital leaders’”.

90. The previous ETI Report in April 2011, although providing evidence which is now very dated, assessed the quality of education provided by the school as ‘good’.

### **Composite Classes and Teaching Staff**

91. Balnamore PS operated two composite classes in 2023/24 – one with four year groups and one class of three year groups.

**Table 2: Balnamore PS – Composite classes 2023/24**

<b>Table 2: Composite Classes – Balnamore Primary School</b>		
	<b>Year Group</b>	<b>Number of Pupils</b>
Years 1, 2, 3 and 4	Year 1	1
	Year 2	2
	Year 3	5
	Year 4	3
Years 5, 6 and 7	Year 5	0
	Year 6	4
	Year 7	1

92. The SSP states that there should be no more than two composite year groups in a single classroom at primary school level. In 2022/23, Balnamore PS had 4.6 FTE teachers. The CfC asserts that the 3.4 teaching complement is reflective of a three class base which operated in 2021 and has remained unchanged but has been impacted by unexpected circumstances: the school experienced a significant downturn in pupil numbers in September 2022, the teaching Principal took up another position and the engagement of an Associate Principal on a part time basis in a non-teaching capacity. The SSP recommends a minimum of four teachers at primary school level. The department has verified that for 2021/22 and 2022/23 the FTE was 4.6 for Balnamore PS. These figures include the principals and any temporary teachers covering vacancies so this may be the reason for the discrepancy. For 2023/24 the figures are currently unvalidated but are lower than 4.6.

### **Special Educational Needs (SEN)**

93. In 2023/24, there were [REDACTED] enrolled at Balnamore PS with a Statement of SEN.

94. The ETI report of November 2019 does not comment of the provision of pupils with SEN, however the report of April 2011, although now dated, states “the quality of SEN provision is very good” and further comments the school demonstrates an outstanding commitment and sensitive approach to the inclusion of the children with SEN and the special educational needs co-ordinator (SENCO) provides very good leadership and management.
95. The Department notes that there is ██████████ ‘looked after’ attending Balnamore PS. It is widely accepted that children looked after are some of the most vulnerable children in our society, with many suffering trauma, neglect and/or abuse and having to learn to survive in an unsafe world. They often have very complex needs, including cognitive difficulties linked to developmental trauma. A lot of times, given a high frequency of placement moves, school is a key element of stability for them and presents the opportunity to form key relationships with peers and members of staff in a warm, welcoming, and nurturing environment.
96. Therefore, it is of vital importance to consider the specific needs of children looked after in any significant changes to their school environment and provide targeted and timely support to manage their needs. For example, the DE/DoH A Life Deserved Strategy has a central principle of ensuring stability is prioritised for children looked after, both in terms of their home and school placements. Therefore, as part of the implementation of any school transition the needs of children looked after within the school cohort should be considered.
97. It is noted in the Case for Change (CfC) that Balnamore Primary School (PS) is not considered a sustainable school. Attendance at a sustainable school underpins the fundamental principles of the SEN Code of Practice<sup>3</sup>, which focuses on a continuum of need and a continuum of provision, which may be made in a variety of forms. Children with SEN require the greatest possible access to a broad and balanced education, including the Northern Ireland Curriculum.
98. The CfC states that “the proposal will meet the educational needs of pupils. It will also continue to provide additional support to those who require it, ensuring those pupils with SEN realise their full potential. Pupils with SEN will continue to have their special educational requirements met, supported by Children and Young People Services (CYPS).”
99. Input provided by the Special Education Team (SET) would not oppose this DP, subject to any impact on pupils with SEN being considered and managed

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<sup>3</sup> <https://www.education-ni.gov.uk/articles/special-educational-needs-code-practice>

effectively. The CfC states “pupils from Balnamore PS who have special educational requirements will continue to have these needs met within local schools and supported through the Education Authority’s Children and Young People’s Service.”

### **Pastoral Care**

100. Owing to the ETI inspection report of December 2019 being affected by ASOS it was unable to fully evaluate the outworking’s of the arrangements for safeguarding in the school. It is however noted that the school provided evidence that the arrangements for safeguarding children reflect broadly the guidance of the Department.
101. The inspection report of April 2011, although very dated, found that the quality of the arrangements for pastoral care were “very good” and that “the school has an inclusive and supportive ethos where the contributions of the children are valued and enacted upon”.

### **Extra-Curricular Activities**

102. The CfC asserts the school offers a ‘Busy Bee Club’ providing a breakfast club from 8am daily and after school clubs from 2pm-4pm daily. The school has coaches from the Joey Dunlop Centre who support sports clubs and a local resident who takes craft and baking clubs.
103. The CfC further asserts that due to the falling enrolment in the school, the EA does not deem it reasonable or sustainable for the small number of staff in the school to maintain curricular and extra-curricular provision which would be equitable to those offered by larger schools.

### ***Criterion 2: Stable Enrolment Trends***

104. Balnamore PS has approved admissions and enrolment numbers of 16 and 111 respectively. **Chart 1** sets out the school’s total actual enrolment for the last five years. It shows that the school has experienced a notable downturn in pupil numbers and has admitted less than its approved number in each of the past five years. Enrolments have been steadily declining and quickly from 90 pupils in 2018/19 to 16 pupils in 2023/24.
105. The school’s enrolment is below its approved enrolment and significantly below the recommended minimum enrolment threshold of 105 for a sustainable rural primary school, as set out in the SSP.

106. **Table 3** below shows the pattern of applications to the school. The table illustrates the school has been undersubscribed with first preference and all preferences for the past six years. Figures from the EA at the conclusion of the Stage one admissions process indicate that the school has only received one application for admission to Year 1 for September 2024.

**Table 3 – Balnamore PS First and Total Preferences for Year 1**

**Application for Admission (EA info. at the conclusion of the admissions process) –**

<b>Year</b>	<b>Approved Admissions</b>	<b>First Preferences*</b>	<b>Total (all preferences)*</b>
<b>2019/20</b>	16	6	6
<b>2020/21</b>	16	3	4
<b>2021/22</b>	16	4	4
<b>2022/23</b>	16	2	2
<b>2023/24</b>	16	0	0
<b>2024/25</b>	16	1	1

***Criterion 3: Sound Financial Position***

107. The school’s provisional Deficit position as of 31 March 2023 is **-£81,914**. The school’s Deficit in the previous year, up to 31 March 2022 was **-£16,951**.

108. As stated in the EA’s guidance on Financial Management Arrangements for Controlled and Maintained Schools funded under the Common Funding Scheme, schools in a deficit or surplus position must not exceed an upper limit of 5% of the school’s budget or £75,000, whichever is lesser. Balnamore PS is not within this tolerance.

109. The school received a total Common Funding Formula budget of £173,384 in the **2023-24 financial year** for **29<sup>1</sup>** FTE pupils, which generates a per capita of £5,979. The average for all primary schools is £3,403.

110. The total Free School Meals Entitlement for the school is **10<sup>4</sup>** pupils, which represents **34.48%** of the total FTE, which places the school in **Band 2** for funding purposes.

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<sup>4</sup> The school’s funding allocation is based on the previous year’s census data (e.g. the October 2022 census data was used to determine the 2023-24 CFF allocation). **The census data on the Schools+ database relates to an academic year, as opposed to the financial year.** In addition, differences between funded pupils and total pupils within the census count may occur for a number of reasons, including, but not limited to, zero rated pupils, some reception pupils, and over age pupils (paragraph 7 of Annex B to the Common Funding Scheme refers).

111. The school received £51,829 for Small Schools Support funding, which represents **100.00%** of the maximum funding for this factor, within the Nursery & Primary funding stream.
112. The school also received £16,420 in respect of Primary Principals' Release Time which represents the 100% of the maximum.
113. The CfC states that Balnamore PS does not operate within its in-year budget and that the school's three-year financial plan 2020-2023 shows a projected deficit of **-£284,355** at the end of the 2025/26 financial year.

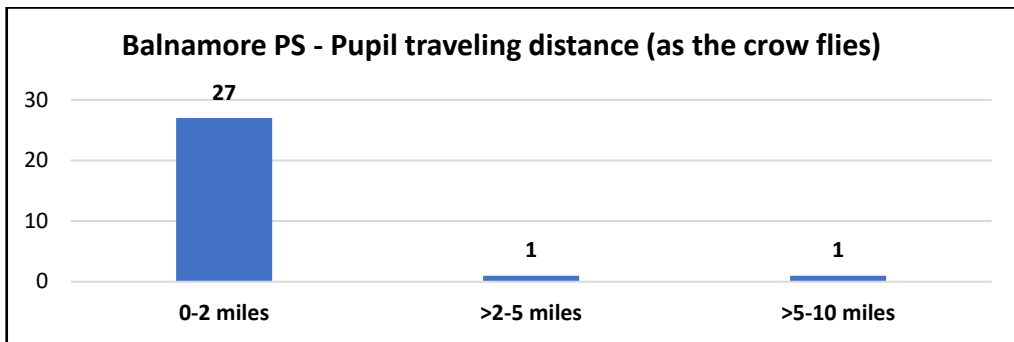
#### ***Criterion 4: Strong Leadership and Management***

114. The CfC asserts that since 2019 there have been changes in leadership with a principal being appointed in August 2020 to August 2022, an Associate Principal in place from September 2022 to September 2023, and most recently a seconded Principal taking up post on 11 September 2023.
115. The most recent ETI engagement was the primary school inspection in November 2019 and was unable to fully evaluate the leadership and management of Balnamore PS due to ASOS. The report noted "the instability in leadership and the associated impact on senior and key roles of responsibility in the school are matters of concern".
116. The ETI Inspection report of April 2011, although now very dated (13 years old), assessed the quality of leadership and management as 'good'. ETI commented "*the Principal has been in post for 12 years and her leadership is very good*". It further states "*the school governors make very positive contributions to the life and work of the school and support well the Principal and the staff. They involve themselves in overseeing the work of the school, attend relevant training and observe lessons to gain a better understanding of learning and teaching*".
117. The April 2011 report also noted that a collegial approach to school development planning had been established which improves the staff and governors in establishing proprieties for a three year school development plan that is carefully budgeted and improves the whole-school provision for learning.
118. The ETI input (**Appendix E**) indicates that there is no information available in relation to criteria four – Strong Leadership and management.

**Criterion 5: Accessibility**

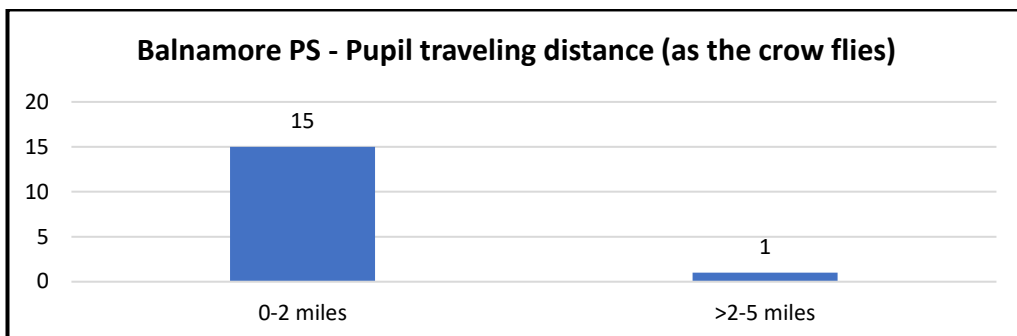
- 119. **Map 1** and **Map 3** illustrates the locations of the 16 pupils currently attending Balnamore PS and shows that they live within the immediate area. **Map 3** demonstrates that the majority of pupils live within a five-minute drive time of the school. The SSP includes guidance on the maximum travel times recommended for primary school pupils of 30 minutes for a single journey, i.e. one hour per day in total. Balnamore PS is, therefore, accessible to its pupils as stipulated in the SSP.
- 120. **Map 3** also illustrates the nearest alternative primary provision and shows that there are 10 neighbouring schools within 10 minutes' drive time of Balnamore PS and there are 116 available places.
- 121. The CfC asserts the school can be accessed by car and bus and the majority of pupils attending the school are from the village and local area.
- 122. **Chart 4a** and **Chart 4b** illustrates the pupil travelling distance (as the crow flies) for the 2022/23 and 2023/24 academic years. It shows that most of the pupils (27 (93.1%)) for 2022/23 and (15 (93.75%)) for 2023/24 attending the school are within two miles traveling distance.

**Chart 4a - Balnamore PS - Pupil traveling distance (as the crow flies) – 2022/23**



Source DE census data

**Chart 4b - Balnamore PS - Pupil traveling distance (as the crow flies) –2023/24**



### ***Criterion 6: Strong Links with the Community***

123. The CfC states that the school “has close links with Balnamore Community Association”, which has funded trips to the pantomime for the whole school and subsidised transport for school trips.
124. It also asserts that the children have performed at various events including Christmas Dinner and Afternoon tea for the Balnamore residents and it is noted that the school received a Tesco grant of £1000 to develop a horticultural project and is working with Radius Housing Association to do a gardening project with residents.
125. The CfC further states “Balnamore Primary School hopes to start a Parent and Toddler group in partnership with the community Association and has hosted talks for parents with young families”.
126. The ETI inspection report of April 2011, although now very dated (13 years old), commented there were effective strategies in place to maintain good home and school links and there are good quality community links. The reports states “the school has developed an effective range of external links with other schools, organisations and agencies which support and broaden the children’s social, cultural and educational experiences. These include links with various Ulster Scots Organisations, multi-agency support teams and business links. The school has maintained a valuable community relations link with neighbouring primary schools and has centred this programme on improving understanding cultural difference and on fostering better community links”.
127. The ETI input (**Appendix E**) indicates that there is no information available in relation to criteria six - strong links with the community.

### **Sustainability Summary**

128. Although dated, evidence shows that the quality of education at Balnamore PS was assessed by the ETI in April 2011 as ‘good’, however due to ASOS the ETI was unable to evaluate fully the quality of education provided by the school in November 2019. In 2023/24 the school operated with three composite class, two of which accommodates more than two year groups (Years 1-2, 3-5,5-7).
129. Census data for 2023/24 shows the school’s enrolment has fallen further to only 16 pupils which is significantly below the SSP’s recommended minimum threshold of 105 for a sustainable rural primary school. It is recognised that the school has been below its approved admission (16) and enrolment figure (111)

for the past nine years as demonstrated in Table 1 of the CfC and has continued to decline steadily over the same period.

130. The SSP states that there should be no more than two composite year groups in a single classroom at primary school level. The Department notes that Balnamore PS operates with two composite classes in 2023/24, both of which have more than two year groups which is not recommended in the SSP. The Department's figure for both 2021/22 and 2022/23 indicate that Balnamore PS had a FTE of 4.6 however the CfC asserts 3.4 FTE which is below the recommended minimum of four teachers. It should be noted that the Department's figures include the Principal and any temporary teachers covering vacancies which may attribute to the difference.
131. The Department notes that Balnamore PS does not operate within its in-year budget and its financial position has declined over the last number of years and currently has a provisional Deficit of **-£81,914** as of 31 March 2023. The CfC states that the school's three-year financial plan 2020-2023 shows a projected deficit of **-£284,355** at the end of the 2025/26 financial year. The per capita allocation of £5,979 is 176% above the average allocation for all primary schools of £3,403.
132. The leadership and management, when it was last reviewed in 2011, was assessed as good, however the Department notes there has been at least three changes in leadership and management of the school in recent years and as a result of ASOS the ETI was unable to fully evaluate the leadership and management of the school in November 2019. The Department had been unable to determine the quality of leadership and management at the school.
133. In terms of accessibility, the school is accessible to all and can be accessed by car and bus with the majority of pupils attending the school coming from the village and local area. The CfC asserts the school has very strong links with the local community offering Breakfast and after school clubs while also participating in a range of community projects. However, due to ASOS the Department has been unable to determine the school's links with the community
134. In conclusion, Balnamore PS has significant and serious deficiencies when assessed against the SSP's criteria. We are unable to comment on the quality of education and the leadership and management of the school as they have not been fully assessed due to ASOS. However, the school is not operating within its in-year budget and is in a deficit position which is projected to increase giving the significantly low enrolment of the school and its continued decline in pupils numbers. With declining demographics in the area, the evidence points to an unsustainable provision with no future prospect of sustainability being recovered or achieved.

## Educational Impact

135. In the CfC, the EA cites that there should be no more than two composite year groups in a single classroom and a school should have a minimum of four teachers. The CfC also refers to the ETI Chief Inspector's Report 2014-2016 which stated that it is difficult for a teacher to ensure adequate learning progression and meet all learners' needs in composite classes spanning more than two year groups. It also suggested that such classes can limit children's opportunities for social and emotional development with peers.
136. The CfC states that the EA in proposing the discontinuance of provision at Balnamore PS will ensure pupils are provided with places at their nearest suitable school, ensuring access to the Northern Ireland Curriculum and taught in classes with an adequate number of peers and this will improve social interaction between pupils.
137. The Thinking Skills and Personal Capabilities Skills in the Northern Ireland Curriculum are: -
- Thinking, Problem Solving and Decision Making
  - Self-Management
  - Working With Others
  - Managing Information
  - Being Creative
138. The EA asserts that in extremely small class groups, it is very challenging to ensure that pupils can access opportunities as outlined in Council for the Curriculum, Examinations and Assessment (CCEA) guidance, for example to learn from and value other people's ideas, generate possible solutions and communicate with a sense of audience and purpose. A smaller number of pupils in each year group also offers fewer opportunities for extra- curricular activities.
139. In relation to challenges for staff the EA states that Balnamore PS is led by an associate principal, who in addition to the administration and managerial workload, fulfils a number of other duties. In a larger primary school, the workload associated with responsibilities for curriculum areas such as literacy and numeracy and other co-ordinator roles such as SENCO and Shared Education Co-ordinator would be more widely distributed amongst the staff team. The SSP note that "*teachers in small schools also face problems of having less scope for professional interaction and mutual support*".

140. The EA recognises the generational learning and teaching provided by Balnamore PS however it has a duty to ensure that the available resources are used in an appropriate way across the whole system to ensure equitable access to high quality education for all pupils. The CfC also states, “pupils from Balnamore PS who have special education requirements will continue to have these needs met within the local schools and supported through the EA’s Children and Young People’s Service”.

## **ASSESSMENT OF STATUTORY CONSIDERATIONS**

### **Rural Needs Act (Northern Ireland) 2016**

141. Rural proofing has been a requirement for all Government departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016, the commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (Northern Ireland) 2016 ('The Act'). The Act places a duty on Government departments to have due regard to rural needs when developing, adopting, implementing, or revising policies, strategies and plans and when designing and delivering public services. It came into operation for Government departments and District Councils on 1 June 2017 and applied to public authorities from 1 June 2018
142. The aim of the Rural Needs Act (Northern Ireland) 2016 is to improve outcomes for rural dwellers by ensuring that the social and economic needs of people in rural areas are given due regard to by public authorities in their decision-making processes and to increase transparency on how public authorities consider rural needs when undertaking their functions.
143. The former Minister, Peter Weir MLA (now Lord Weir of Ballyholme), gave approval to redefine the SSP urban and rural definitions from 1 September 2022 by adopting the NISRA default definition of urban and rural settlement sizes. Under the revised definition, Balnamore PS continues to be defined as a rural school.
144. In former Minister Michelle McIlveen’s Written Statement to the Northern Ireland Assembly on 9 August 2021, she advised that the SSP is not regarded as a policy for the closure of schools and collaboration within and across sectors is a means of delivering a quality educational experience for all our children and young people in sustainable settings. Although the EA considered other options for the school, they determined that *‘In considering the future of Balnamore PS, all of the options for the school did not provide a sustainable provision for the school’*.

145. The SSP states that '*strong, sustainable schools providing quality education and access to the full curriculum are central to the achievement of the educational vision*'. One of the objectives of the SSP is to ensure that the excellent quality of education available to some young people is made available to all, in both urban and rural settings.

146. A Rural Needs Assessment is included in the Equality and Human Rights Screening of the proposal published by EA which is reproduced at **Appendix I**. This details that: -

- *Balnamore PS is a Controlled, rural school and all of the children attending are from the local area. It is acknowledged that the school has failed to meet its enrolment number of 111 for a number of years, leading to a high percentage of available places across the years;*
- *The impact of the closure of Balnamore Primary School on the 16 pupils will be mitigated by the availability of places in alternative Controlled Schools in the area should parents prefer this option;*
- *Children will be afforded places in more sustainable schools which will enhance curriculum provision, including interaction with peers. These alternative schools fit with the ethos and religious makeup of the current school;*
- *The EA will provide advice, support and assistance to staff in respect of potential redeployment opportunities; teaching staff are afforded two years protected employment under the School Re-organisation Agreement 2013/2;*
- *School Re-organisation Agreement is also on place for a period of one year for non-teaching staff. Those non-teaching staff affected will be offered redeployment or voluntary redundancy; and*
- *The EA is aware of the important community role that the Balnamore PS plays and will investigate with the community how this can continue should the school close and it is no longer required for educational purposes. However, the EA is not in a position to 'gift' or otherwise the property as it will be subject to the limitations placed on it by Government guidance on the disposal of public assets.*

147. The screening template notes that the aim is the provision of a network of viable and sustainable schools that can deliver the Northern Ireland Curriculum effectively and provide access to a range of educational provision that is appropriate to the needs of children and young people, so that every pupil can realise their potential and contribute to a caring inclusive and progressive society.

## Effective and Efficient Use of Public Funds

148. The Department must be mindful of its duty under Article 44 of the Education and Libraries (Northern Ireland) Order 1986 and under Managing Public Money to ensure effective and efficient use of public funds.
149. In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of resources available to it. The assessment of Balnamore PS against the criteria and indicators of the SSP demonstrates that the school is unsustainable and fails to meet some criteria.
150. As Balnamore PS is a small school with only 29 pupils in 2022/23, which has further declined to 16 pupils in 2023/24. The school receives the maximum amount of Small Schools Support funding £51,829. In 2023/24, Balnamore PS received a per capita allocation of £5,979 which compares to an average for all primary schools of £3,403.
151. The evidence set out above illustrates that Balnamore PS was in a deficit position in 2022/23 (-£16,951) which has increased to a provisional deficit -£81,914 for the 2023/24 academic year, and the continued decline in enrolment at the school will place even further financial burden on resources and teaching staff at the school as evidenced in the CfC which asserts that the school's three-year financial plan shows a projected deficit of -£284,355 at the end of 2025/26 financial year.
152. Area Planning of the school estate across Northern Ireland is not solely about the financial health of schools. The focus is the educational experience of children and young people being educated in a school that is educationally and financially viable. Generally, it is acknowledged that as numbers in a school decline, the challenges it must overcome in order to provide a high-quality education rise. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers.
153. The Department's considerations around the continuation of Balnamore PS must be balanced against the need to avoid unreasonable public expenditure and currently, the school's low enrolment and no evidence of the prospect of reaching the minimum sustainability thresholds, combined with a projected financial deficit highlights serious concerns about its long-term viability both educationally and financially.
154. The approval of this DP to discontinue Balnamore PS may require additional provision of home-to-school transport for the safe transportation of pupils from the area to their nearest school. Any transport costs are likely to be minimal and

transport arrangements would be in accordance with the transport regulations and identified preference school, based on eligibility set out in DE Circular 1996/41 Home to School Transport.

### **Section 75 of the Northern Ireland Act 1998**

155. Section 75 of the Northern Ireland Act 1998 ('The Act') requires designated public authorities (including: the Department of Education, the EA and the Council for Catholic Maintained Schools (CCMS) etc) to carry out all their functions:-
- with due regard to the need to promote equality of opportunity in respect of religious belief, political opinion, gender, race, disability, age, marital status, dependents and sexual orientation; and
  - to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
156. The Area Planning process supports the implementation of the Department's SSP, which aims to ensure that all pupils have access to a broad and balanced curriculum that meets their educational needs in a school that is educationally and financially viable. Area Planning has been in place since 2011 and has gone through several processes of review and refinement.
157. The Department conducted Equality Screening i.e. an assessment of a policy's impact on equality of opportunity and/or good relations on 'Area-based Planning' in October 2012 and October 2014 with the recommendation that a full equality impact assessment was not required with the following reason stated "The overall policy approach of area-based planning is not expected to have a differential impact on any specific group. It is designed to help support a range of education policies. At local area level proposed changes consistent with an area-based planning approach may have impacts on particular groups and these would need to be considered and addressed, if necessary, before decisions would be made".
158. In considering the EA functions, the CfC confirms that Equality screening and statutory requirements of the Rural Needs Act (Northern Ireland) 2016 (where appropriate) have been considered. This is in line with the Department's guidance on Development Proposals (DE Circular 2017/09). In relation to Section 75, 10 responses were received by the proposer. The CfC states "these comments and all responses have been taken into account when assessing the equality impact of the proposal". The Equality and Human Rights Screening Template provided by the proposer for this proposal is included at **Appendix I** and comments "*The Education Authority will work with parents and the school to mitigate any factors which they consider disadvantage the pupils e.g. in securing admission to a suitable school; the provision of transport and uniform support in*

*accordance with current policies and induction support for pupils who may find the change of school a challenging experience.”*

## **RESOURCE IMPLICATIONS**

### **Finance**

159. The operational cost of Balnamore PS will be a cost saving inclusive of a saving of £51,829 small schools support factor and £16,420 in respect of Primary Principals' Release Time.

### **Staffing**

160. Should the DP be approved, the teaching staff is afforded employment protection under the School Re-organisation Agreement 2013/2 for two years. The non-teaching staff will be afforded employment protection for one year under the Collective Agreement (JNC Circular 224). The EA will meet with staff to discuss options and an action plan would then be implemented for discontinuance of the school.

### **Transport**

161. The CfC states that the discontinuance of Balnamore PS will have an impact on the local area. The provision of home to school transport will provide for the safe transportation of pupils from the area to their nearest school. Any transport arrangement will be in accordance with transport regulations. Given the small number of pupils involved, the financial implications for the transport budget would not be significant.

### **Accommodation**

162. As DP 720 relates to a closure there are no associated accommodation costs.

## **AREA PLANNING CONSIDERATION**

163. The EA asserts that DP 729 aligns with the key themes of Area Planning which aims to ensure that all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education.
164. In considering the future for Balnamore PS a range of options were considered (paragraph 27), none of which provided sustainable provision at the school, and the option to discontinue the school was proposed.
165. **Table 4** details the number of primary school aged pupils within a five-mile mapping radius of Balnamore PS and the breakdown of the schools which they attend in descending rank order. It demonstrates there are 2045 pupils available

attending 47 different schools and only 28 pupils (2022/23) attend Balnamore PS which is the 16th selected school making it a low priority application within the local area.

**Table 4 - Available Pupils within 5 miles of Balnamore PS and the schools they attend.**

School Name	Number of Pupils
Ballymoney Model IPS *	339
Leaney PS *	287
St Brigid's PS Ballymoney *	157
Irish Society's PS	153
Damhead PS *	139
Lislagan PS *	113
Eden PS *	85
Culcrow PS *	75
Garryduff PS *	63
Carrowreagh PS *	59
Kilmoyle PS *	58
Castleroe PS *	52
D H Christie Memorial PS	52
Landhead PS *	51
Gorran PS	39
Balnamore PS	28
Millburn PS	26
St Malachy's PS Coleraine	25
Millstrand IPS	22
Ballysally PS	21
St Columba's PS Kilrea	19
St Joseph's PS Dunloy	19
Bushvalley PS	18
Harpurs Hill PS	16
Killowen PS	16
Carnalridge PS	14
The Wm Pinkerton Memorial PS	14
Macosquin PS	12
Ballytober PS	9
Portrush PS	9
St John's PS Coleraine	9
St Patrick's PS Ballymena	9
Portstewart PS	8
Knockahollet PS	7
Carhill IPS	4
Rasharkin PS	4

Garvagh PS	3
St Columba's PS Garvagh	2
Armoy PS	1
Buick Memorial PS	1
Bushmills PS	1
Hezlett PS	1
Kilrea PS	1
Six Mile IPS	1
St Colmcille's PS Ballymena	1
St Patrick's & St Joseph's PS Garvagh	1
Straidbilly PS	1
Grand Total	2045

\* Within 5 mile mapping radius of Balnamore PS.

Figures include pupils with SEN

Figures include Nursery and Reception pupils

Source DE Census data 2022/23

166. **Table 5** details the number and percentage of primary school aged pupils, by school management type, within a five-mile mapping radius of Balnamore PS. It demonstrates that parental preference is for Controlled provision (70.27%, 1437 pupils). Analysing this information and considering the schools in the area, it is evident that there are currently 1437 pupils with a controlled approved enrolment of 1938 (indicating there is over capacity in the area) as detailed in **Table 1**.

**Table 5 – Available Pupils, by School Management Type, within 5-mile mapping radius of Balnamore PS**

Management Type	Number of Pupils	Percentage
Catholic Maintained	242	11.83%
Controlled	1437	70.27%
Controlled Integrated	344	16.82%
GMI	22	1.08%
Grand Total	2045	100.00%

167. Further analysis of the area shows that of the 10 neighbouring Controlled schools, seven of them have enrolments below the SSP threshold of 105 pupils for a rural primary school (Eden PS, Landhead PS, Culcrow PS, Carrowreagh PS, Garryduff PS, Kilmoyle PS and Castleroe PS), and that six of these schools also have an approved enrolment number below the SSP recommended threshold (Eden PS, Landhead PS, Culcrow PS, Carrowreagh PS, Garryduff PS and Castleroe PS). **Table 1** illustrates that only one school Culcrow PS was oversubscribed at first preference. There are four Controlled schools in the area that have sufficient available places which, in the event that you decide to approve closure of the school, could accommodate the children currently attending the school.

168. The Department notes that Culcrow PS was identified as meeting the criteria of the Normalisation process, however, was not approved to increase its approved admissions and enrolment numbers to 15 and 105 respectively. The EA noted that while Culcrow PS has experienced increased enrolment numbers, other local schools, Castleroe PS, Eden PS, Gorran PS and Balnamore PS are all within a five-mile radius and all with available places with some of those schools just below the threshold for a sustainable (rural) primary school. In consideration that there are available places in the area and with some schools exhibiting sustainability issues, it may not be appropriate to take forward Normalisation for this school in advance of the outcome of Area Planning discussions and therefore could be premature. In addition, the projected demographics for the area show a downward trend.
169. It is noted that The EA's OP1 contains an action to review primary provision within the Causeway Coast and Glens Borough Council LGD to explore innovative and collaborative working to provide sustainable provision in the area.
170. **This proposal is not an area solution.** In fact, it is clear this area requires wider attention as can be seen from the snapshot (**Table 1**) there are 10 alternative Controlled primary schools within a five-mile mapping radius of Balnamore PS. Seven of these schools have an enrolment below the SSP threshold of 105 (Eden PS (90), Landhead PS (54), Culcrow PS (102), Carrowreagh (83), Garryduff PS (72), Kilmoyle PS (95), and Castleroe PS (92)) and five of those schools had available places. In total (including Balnamore PS) for the 2023/24 academic year there are 1359 approved enrolment places in Controlled schools with an actual enrolment of 1204 resulting in 229 available places in the area (97 of these were at Balnamore PS). This proposal is a necessary first step for a larger area planning solution that needs to be taken forward by the EA to address sustainability issues as referenced in OP1.
171. The Department also notes that pre-school provision has been established by Balnamore Community Support Group and is currently funded by a private donor, it should be noted this provision is not provided by the Pre-school Education Programme (PSEP) and while it claims the setting will follow the pre-school curricular guidance it is not inspected by the ETI and does not form part of the Department's pre-school education offer. It is uncertain how long this pre-school provision will be provided.

172. **Table 6** below details the 15-year enrolments of the neighbouring Controlled schools within a five-mile mapping radius of Balnamore PS. It illustrates that there five schools with enrolments that have consistently been under the recommended SSP minimum of 105 (Eden PS, Landhead PS, Carrowreagh PS, Garryduff PS and Castleroe PS).

**Table 6** – 15-year enrolment of neighbouring provision around Balnamore PS (five-mile mapping radius)

DE Ref	School Name	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
3016447	Balnamore PS	87	104	104	110	102	103	103	103	97	90	71	52	45	29	16
3010796	Eden PS	81	89	85	83	82	77	72	66	63	72	79	78	83	86	90
3013325	Leaney PS	314	292	303	310	313	299	287	282	297	301	302	321	306	299	287
3010787	Lislagan PS	103	102	99	107	114	112	116	113	120	121	123	124	116	116	109
3010795	Landhead PS	51	59	53	59	54	63	66	63	61	61	52	62	60	58	54
3012225	Damhead PS	182	180	177	189	201	197	196	206	209	211	209	206	197	204	204
3012065	Culcrow PS	57	60	66	74	81	85	94	99	97	105	110	107	111	98	102
3010572	Carrowreagh PS	72	70	71	73	78	79	83	84	82	80	87	77	81	82	83
3010594	Garryduff PS	66	64	69	69	76	77	72	76	80	80	78	79	77	77	72
3010878	Kilmoyle PS	118	121	125	103	93	96	94	81	87	83	85	87	86	99	95
3012288	Castleroe PS	67	71	71	77	82	92	102	110	106	101	97	105	103	96	92
	<b>Total Enrolments</b>	<b>1198</b>	<b>1212</b>	<b>1223</b>	<b>1254</b>	<b>1276</b>	<b>1280</b>	<b>1285</b>	<b>1283</b>	<b>1299</b>	<b>1305</b>	<b>1293</b>	<b>1298</b>	<b>1265</b>	<b>1244</b>	<b>1204</b>

Source: DE Census Data

Figures include Supernumerary pupils

173. In considering optimal enrolment of primary schools (210) there were 1204 pupils (for 2023/24) attending Controlled schools in the area which would cater for 5.7 (6) schools. Given that there are 11 Controlled schools in the area (including Balnamore PS), it is clear that consideration should be given for a comprehensive area planning solution which would consolidate provision ensuring approved enrolments are above the recommended minimum enrolment ensuring sustainable provision for the longer term.

## **CONCLUSION**

174. The Department's vision is to ensure that every child and young person is happy, learning and succeeding and should enjoy a high-quality education and learning experience. All Departmental policies and processes, including Area Planning, contribute to the delivery of that vision and all have, as a central tenet, the educational well-being of children and young people.

175. A central aim of Area Planning is to achieve a network of viable and sustainable schools that are of the right type, right size, located in the right place and have a focus on raising standards. All DPs coming forward must be set in the strategic context and take account of provision and places within the wider area.

176. It is clear from the sustainability assessment conducted in this submission that Balnamore PS is not sustainable; and given that there are now just 16 pupils remaining at the school in 2023/24, with only one Year One application for September 2024 – the prospects of recovery are both unlikely and unrealistic despite the impassioned plea made by many during the statutory objection period. As the numbers of children attending a school are inextricably linked to the financial viability of the school; the depth and projected scale of the deficit is such that it would not be in the best educational interests of children and young people to give the school more time to try and recover the numbers of children applying and attending the school back to pre-2016 levels.

177. However, it is important to advise you on the origins of the circumstances and difficulties faced and experienced by Balnamore PS. There was a strong and consistent theme that emerged from the views submitted to the Department during the statutory objection period. There are two objections which have been replicated below which encapsulate the circumstances accounting for the decline at Balnamore PS – such views are not entirely evident in the CfC as they were received during the statutory objection period conducted by the Department. The objections received are located in **Appendix F**.

178. Objection 12, page 95 Appendix F - *“Disagrees and objects to the proposal. The school is a happy, friendly, local community orientated primary school. all children are included and provided with a warm, welcoming and nurturing environment, allowing children of all abilities including special needs to thrive. We have an exceptional building with excellent facilities, a canteen on site, parking, playground and grassland. the village experiencing economic and social growth with the construction of new housing, it is expected there will be an increase in demand for local and accessible school admission places. The school has struggled with leadership and to maintain permanent leadership over the past few years and this has ultimately had a detrimental effect on pupil numbers. This drop was not all P7 pupils transitioning into year 8 and should have been questioned by the governing bodies, the Board of Governors and the Education Authority. Instead, without question, the school was allowed to continue until such times the numbers were deemed unsustainable. Hence the proposal for closure. I strongly believe it was poor leadership and lack of any interaction from the Board of Governors and the Education Authority who have a duty to monitor and support the school which has resulted in the proposed closure of Balnamore Primary School. I propose that in light of the failures by the Education Authority, the school be given a chance to rebuild its reputation and enrolment numbers through guidance from the Education Authority and any associated bodies that failed the school.”*
179. Objection 65, page 98 Appendix F - *“Does not agree with the proposal. Teaching at the school for 23 years and is saddened and frustrated at the declining numbers. Stresses that this drastic drop in numbers has only happened over the past number of years. Before the decline the school was thriving and gaining recognition of success in many areas. It was the first school in Northern Ireland to receive Ulster Scots Flagship award. The issues occurred when [REDACTED]. From that period the school experienced a high volume of change in terms of leadership within the school. A new permanent principal was not appointed, and this had a detrimental effect on pupil numbers dropping from 2018 to 2021 by 57%. A new principal was appointed in 2020, however through extremely poor and inexperienced leadership a number of parents removed their children resulting in a further drop in pupils over 18 months. The school has been let down by the EA and the situation was not managed effectively by the school’s BoG. I am still witnessing the rippling effects of this trauma both academically and emotionally. The school is situated in the heart of a growing village. The parents have lost faith in the management of the school and placed their children elsewhere. The school is an exceptional building situated securely of the main room, which cannot be said for neighbouring schools. The school deserves at least a 3 year reprieve to be allowed the opportunity to rebuild and become sustainable.”*

180. In total there were 666 objections to the proposal received in relation to DP 729, this submission has documented all of the main themes which emerged during the two-month statutory objection period.
181. The EA state in the CfC that *‘Respondents raised a range of issues that they felt had an effect on the downturn in enrolment numbers. The Education Authority worked with the Board of Governors of Balnamore Primary School through the Chairperson and Principals. The Education Authority provided coordinated support to address a range of issues in the interests of the pupils, staff and school community.’* Whatever those measures were they were either inadequate or insufficient to stop parents removing their children from the school and/or not applying to the school – most of the parental community of Balnamore clearly had lost any trust and confidence both in the school and the EA, this has been borne out in some of the objections received.
182. The main issues raised included the fact that the school experienced a significant period of turmoil with instability in leadership, experiencing seven principals in six years and that there was little to no support provided from the EA to help manage the issues and complaints raised. It is this issue that is cited as being the sole cause for the diminishing numbers at the school and that the school deserves a period of time (three to five years) to rebuild and regain its stability which in turn will increase confidence in the community that the school can again grow. They also highlighted the benefits of smaller, composite classes particularly for children with anxiety or SEN.
183. This proposal is a single school solution that effectively closes a school that suffered turbulent and protracted leadership issues which were not effectively dealt with by the BoG and the EA in a sufficiently timely manner. This proposal is not an area solution and should therefore be considered as a first step of an area solution which the analysis clearly shows.
184. The analysis presented in this submission has shown that an area solution is urgently required within the Controlled sector as several schools are operating below the minimum thresholds set out in the SSP. As can be seen from the snapshot (**Table 1**) there are 10 alternative Controlled primary schools within a five-mile mapping radius of Balnamore PS.
185. Seven of these schools have an enrolment below the SSP threshold of 105 (Eden PS (90), Landhead PS (54), Culcrow PS (102), Carrowreagh (83), Garryduff PS (72), Kilmoyle PS (95), and Castleroe PS (92)) and five of those schools had available places.

186. In total (including Balnamore PS) for the 2023/24 academic year there are 1359 approved enrolment places in Controlled schools with an actual enrolment of 1204 resulting in 229 available places in the area (97 of these were at Balnamore PS).
187. Balnamore PS has and is considered to be both a well-equipped and a school of good order. Given the nature of such good accommodation and facilities at Balnamore PS – it would have been better for the EA to have considered the school as part of a wider area solution sustaining educational provision in this area for the short, medium and long term while making effective use of the educational resources on offer at Balnamore PS. Our advice is to agree to the closure and recommend that the EA develop such an area solution and utilise/incorporate the educational facilities on offer at Balnamore PS.
188. NISRA population projections for the Causeway Coast & Glens LGD **Charts 1 and 2** above, shows a declining birth trend and a declining school age population for Years 1-7 from 12,460 (2023) to 10,326 (2030). NISRA also predict significant reductions in the 0-4 and 5-9 age groups for Northern Ireland from 2023 to 2043 (0-4 age range to reduce from 107,425 in 2023 to 98,868 in 2043 (7.9% decline) and the 5-9 age group will reduce from 124,241 in 2023 to 97,113 in 2043 (21.8% decline). Therefore, it is not anticipated that there would be any significant increase in enrolment over the next 10 years; indeed, in the past three years more pupils have been leaving the school than entering it and it is likely, that the school will experience further decline in its admissions and enrolments.
189. With declining demographics, it will become increasingly difficult for the school to recover a pattern of admission and enrolments which the school previously enjoyed between 2010/11 – 2016/17 and sustain the same degree of education provision that currently exists. The demographic picture also supports the (urgent) need for a wider area solution.
190. Inspection evidence shows that within a composite class of two year groups, it is possible for all children to be catered for effectively and make good progress. There is no evidence from school inspections to suggest that children taught in composite classes of two year groups are disadvantaged in any way.
191. However, additional factors need to be considered when the composite class spans more than two year groups. Under these circumstances ensuring adequate progression in learning and planning to meet, and meeting, the individual needs of children across a wider ability range and stages of development can be more challenging for the teacher and there is less scope for professional interaction and mutual support.

192. The EA asserts that in extremely small class groups, it is very challenging to ensure that pupils can access opportunities as outlined in CCEA guidance, for example to learn from and value other people's ideas, generate possible solutions and communicate with a sense of audience and purpose. A smaller number of pupils in each year group also offers fewer opportunities for extra-curricular activities.
193. There are also issues relating to opportunities for the children to develop socially and emotionally with children of a similar age, gender and stage of development. Smaller numbers of pupils in each year group limits the opportunities for working alongside peers, social interaction and challenge, and participation in extra-curricular activities including team-based experiences.
194. The then Minister of Education, Michelle McIlveen, in her Written Statement to the Northern Ireland Assembly in August 2021 (Setting the Priorities for the next Strategic Area Plan) did state *'There are those who believe the application of the Department's Sustainable Schools Policy is the death knell to small unsustainable schools; and yes we continue to have too many small schools with too few pupils to generate sufficient funds to deliver the curriculum to an acceptable level. I want to correct that perception, however, and reaffirm that the Sustainable Schools Policy is first and foremost about ensuring the quality of the educational experience for all our children and young people. I want to emphasise that the Sustainable Schools Policy describes various solutions available, to be explored with a view to ensuring there is a viable and sustainable level of quality educational provision and improved community relations in areas where enrolments have been too small or in decline.'* The EA in the CfC state "in considering the future of Balmore PS, all other options for the school did not provide a sustainable provision for the school.
195. The Department notes that Balmore PS is in a provisional deficit position (-£81,914 as at 31 March 2023) and the EA asserts that the school does not operate within its in-year budget with the three-year financial plan projecting a deficit of -£284,355 by the end of the 2025/26 financial year. The evidence set out above shows that the per capita cost of £5,979 is 176% of the average for all primary schools of £3,403 (2023/24).
196. In relation to the potential negative impact which this closure may have on pupils and the local community, the EA has given due regard to this through their application of Section 75 of the Northern Ireland Act 1998 and the Rural Needs (Northern Ireland) Act 2016 and have commented that *"The Education Authority will work with parents and the school to mitigate any factors which they consider disadvantage the pupils e.g. in securing admission to a suitable school; the provision of transport and uniform support in accordance with current policies*

*and induction support for pupils who may find the change of school a challenging experience.”*

197. The CfC states that the EA considered other options however, it was determined that there was no evidence that any of the alternative options could provide sustainable provision. The core issue for a school’s sustainability and future must be the continuing provision of a high-quality education for the children. Generally, it is acknowledged that as numbers in a school decline, the challenges it must overcome in order to provide a high-quality education are increased. It is this same consideration that we would recommend the EA actively pursues to the wider area as there are a number of other controlled schools with enrolments below the recommended thresholds for a rural primary school.
198. The core issue for sustainability must be the continuing provision of a high-quality education for the children. There can be several educational issues that can arise particularly from schools with small or declining enrolments. Where it would appear that the quality of teaching and learning is very good in a small school, it is not surprising that parents and the wider community are content with the status quo. The costs in human and financial terms, however, can often be considerable. In some schools there may be undue and substantial pressures on staff, for example in planning to address the wide range of needs, year groups and abilities, in evaluating the curriculum and in managing educational change.
199. Small primary schools face a particular difficulty in delivering a high quality of education where staff members have to contend with unduly demanding workloads and small (and perhaps diminishing) enrolments. Small primary schools can face challenges in meeting the educational requirements of the children. The challenges can become increasingly greater when:
  - i. there are composite classes with more than two age-groups within most classes. This is likely to occur when there are fewer than four teachers, one of whom will be a teaching principal; and
  - ii. There are only two teachers, one of whom will have responsibility for four different age groups, and the other three different age groups. In addition, one of the two teachers will also have a responsibility as a teaching principal.
200. Balnamore PS conforms to the two scenarios above and given the low and falling enrolment with little prospect of recovery the school is unlikely to provide a wide programme of extra-curricular activities and will have a smaller range of teacher specialisms e.g. music. The smaller numbers of children in each year group will limit the opportunities for working alongside peers, social interaction and

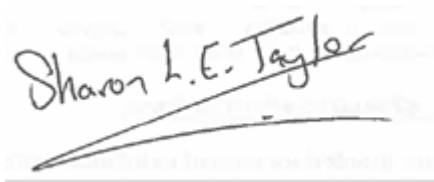
challenge, and participation in extra-curricular activities including team-based experiences.

201. There is an abundance of available places (229) especially in the controlled sector for the children and young people of Balnamore PS can attend that are adequately accessible.
202. The ETI have stated 'attendance at a larger school may potentially provide the children with more opportunities to develop and apply their skills and dispositions through greater opportunities for working alongside peers, social interaction and challenge, and participation in extra-curricular activities including team-based experiences.'
203. The EA have stated there is no immediate need for any further specialist provision to be provided in this area.
204. The closure of any school is a difficult decision and there is significant support in the local community to keep the school open. The decline at Balnamore PS has been both dramatic and traumatic for all involved. However, the evidence supporting DP 729 clearly shows that with such a low enrolment of only 29 pupils in 2022/23 with a further decline to 16 pupils in 2023/24 shows that Balnamore PS is not sustainable now nor likely to be in the future. The sustainability challenges facing Balnamore PS are undeniable and inescapable it is therefore recommended that DP 729 should be approved so that better educational opportunities can be provided to the children and young people of Balnamore PS.
205. The evidence and analysis also show that the area surrounding Balnamore PS required a comprehensive area solution which should have involved other Controlled schools also experiencing sustainability challenges. Had such an area solution been explored and brought forward may have provided all school communities in the area with greater clarity as to how education (in this area) could be sustained into the future. It is recommended that you ask officials to write to the EA in such terms.
206. If you agree with the recommendations below, as part of the discontinuance of Balnamore PS the EA will consider transition arrangements and work with the school and parents in placements of all children (including looked after children and children with SEN).

## **RECOMMENDATION**

207. Based on the evidence detailed above, it is recommended that you:

- (i) Approve DP 729 with modification, to discontinue Balnamore Primary School with effect from 31 August 2025, or as soon as possible thereafter;
- (ii) Ask officials to write to the EA asking them to develop an area solution to address issues of sustainability and consolidate Controlled provision; and
- (iii) Agree that this submission (with appropriate redactions) can be made available on the Department's website once the EA and the school has been informed.

A handwritten signature in black ink that reads "Sharon L.E. Taylor". The signature is written in a cursive style and is positioned above a horizontal line.

## **Sharon Taylor**

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