

DE/2026-111 – Freedom of Information Request

Request:

I wish to request all information held relating to the Risk Register for the Development Proposal concerning:

- St Malachy's Primary School, Kilclief, and
- St Joseph's Primary School, Strangford.

This request covers the period 1 January 2020 to the present.

This request concerns all information held, regardless of whether your organisation considers the information to relate to a Development Proposal, an Accommodation Review, capital works, or internal planning.

For clarity:

Risk identification, risk assessment, risk scoring, and risk management are NOT Development Proposal activities.

They fall within your organisation's statutory responsibilities before, during and after any DP process.

Therefore, your organisation cannot rely on the position that it "does not become engaged until a DP is published" to refuse or limit disclosure.

This request includes all recorded information in any format, including emails, Teams chats, WhatsApp messages, handwritten notes, drafts, attachments, internal memos, meeting notes, spreadsheets, and correspondence.

1. Full Development Proposal Risk Register

Please provide:

- the complete Risk Register
- all drafts
- all internal versions
- all updates or revisions
- all attachments or appendices
- all internal comments or annotations

2. Internal discussions about risks

Please provide all internal communications relating to risks associated with:

- closing St Malachy's
- expanding St Joseph's

- the modular works at St Joseph's
- suitability and capacity concerns
- health & safety or evacuation concerns
- consultation backlash
- legal challenge
- equality duties
- Rural Needs Act compliance
- investment disparity
- predetermination
- failure to disclose material information

This includes:

- internal emails
- Teams chats
- WhatsApp messages
- handwritten notes
- meeting notes
- briefing papers

3. Risk assessments linked to the Accommodation Review

Please provide:

- any risk assessments prepared before the DP
- any risk assessments prepared during the Accommodation Review
- any risk assessments prepared after the modular expansion began
- any risk assessments relating to capacity, safety, suitability, or investment decisions

4. Documents identifying risks that could undermine the DP

Please provide all documents identifying risks relating to:

- predetermination
- investment disparity
- suitability of St Joseph's
- sustainability of either school
- failure to follow statutory duties
- failure to follow the Sustainable Schools Policy
- failure to follow the Rural Needs Act
- failure to follow Equality duties

- failure to treat both schools fairly
- failure to disclose material information to parents
- failure to follow proper consultation standards

5. Correspondence with EA/DE/CCMS about risks

Please provide:

- all correspondence between CCMS and EA
- all correspondence between CCMS and DE
- all correspondence between EA and DE

relating to:

- risks identified in the DP
- risks relating to the modular expansion
- risks relating to the suitability of St Joseph's
- risks relating to the closure of St Malachy's
- risks relating to consultation fairness
- risks relating to legal challenge

6. Risk scoring, rating and mitigation documents

Please provide:

- risk scoring matrices
- risk impact assessments
- risk likelihood assessments
- mitigation plans
- action plans
- risk ownership documents
- any documents showing how risks were escalated or downgraded

7. Any other information held

Please provide:

- any other recorded information relating to risks, risk assessment, risk management, or risk identification for the DP or Accommodation Review.

For the avoidance of doubt:

This request concerns information held by your organisation.

Whether or not a Development Proposal has been published is irrelevant to your obligation to disclose information relating to risk identification, risk assessment, risk scoring, risk management, or internal discussions about risks associated with the Accommodation Review, capital works, or the proposed closure of St Malachy's PS.

If your organisation intends to rely on the position that it “does not become engaged until a DP is published”, please specify the statutory basis for this claim.

Department Response:

I refer to your request of 15 June 2026 under the above legislation, in which you have requested all information held by the Department of Education relating to the risk register for the Development Proposal concerning St Malachy’s Primary School, Kilclief and St Joseph’s Primary School, Strangford for the period 1 January 2020 to the present.

In respect of Section 1(1)(a) of the Act, I wish to advise you that following a search of our records, only some of the information you have requested is held by the Department. I shall address each of your questions in turn.

1. Full Development Proposal Risk Register

This information is not held by the Department of Education (“the Department”). The Department does not become engaged with any Development Proposal (DP) activity until a DP has been formally published by the Education Authority (EA). No DP has been published for St Malachy’s Primary School, Kilclief or St Joseph’s Primary School, Strangford. The Department’s statutory role only begins when a DP has been formally published by the EA. Until a DP is published, any consultation, analysis, documentation or engagement activity is a matter for the proposing authority, which in this case is the Council for Catholic Maintained Schools (CCMS). Freedom of Information Requests may be submitted to CCMS, either in writing or by email, to foi@ccmsschool.com or sent by post to CCMS, Third Floor, Linen Hill House, 23 Linenhall Street, Lisburn, BT28 1FJ.

2. Internal discussions about risks

I can confirm that the Department holds some of the information requested and I have attached pdfs of the feasibility report (Document 1) and the business case (Document 2) for the Minor Works project at St Joseph’s Primary School, Strangford along with associated documents 2a-2g relating to drawings and costs.

Please note some information has been redacted under section 40(2) of the Freedom of Information Act 2000 as this information constitutes the personal information of third parties and disclosure would breach the first data protection principle. This is an absolute exemption and is not subject to a public interest test.

3. Risk assessments linked to the accommodation review

This information is not held by the Department. The Department does not undertake risk assessments of an accommodation review and has not completed a risk assessment while the accommodation project is on site at St Joseph’s Primary School.

4. Documents identifying risks that could undermine the DP

This information is not held by the Department.

5. Correspondence with EA/DE/CCMS about risks

This information is not held by the Department.

6. Risk scoring, rating and mitigation documents

This information is not held by the Department.

7. Any other information held relating to risks for the DP or accommodation review

The Department does not hold any other information relating to risks for the DP or accommodation review.