

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	DP 735
School	Downshire Primary School.
	<i>“Downshire Primary School will Transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter”</i>
Minister’s Decision	Do not approve
Date of Decision	30 August 2026
Minister’s Comments	I have read the evidence provided in the submission and appendices provided by officials in relation to this Development Proposal. I have also considered the judgment of the Court of Appeal in JR335 and JR336. I do not intend to repeat in full the legal and factual analysis contained within the documentation, with which I concur. However, two provisions are critical to the consideration of this Development Proposal. Article 64(1) of the Education Reform (Northern Ireland) Order 1989 provides: “It shall be the duty of the Department to encourage, facilitate and support the development of integrated education and to provide support for integrated education.” Article 92(6) of the Education Reform (Northern Ireland) Order 1989 provides: “The Department shall not approve a proposal under this Article in relation to a school unless it appears to the Department that, if the school were to become, or be established as, a controlled integrated school, the school would be <i>likely</i> to provide integrated education.” I will view the reasonable numbers requirement in the context of Article 64(1) of the 1989 Order. Critically the Court of Appeal considered the relationship between Article 64 and 92(6) and concluded that Article 92(6) remains a mandatory statutory test which must be satisfied. It also observed, “In short, if there is not a reasonable number of Catholic and Protestant pupils attending a school then it is not an integrated school as defined by the legislation.” The outcome of this Development Proposal turns on whether the ‘reasonable numbers’ test set out in 92(6) has been satisfied.

	The Department has set out guidance in relation to 'reasonable numbers' though the statutory test remains the key consideration. As observed above, Article 92(6) of the Education Reform (Northern Ireland) Order 1989 provides (my emphasis in italics): "The Department shall not approve a proposal under this Article in relation to a school unless <i>it appears to the Department</i> that, if the school were to become, or be established as, a controlled integrated school, the school would be <i>likely</i> to provide integrated education." Integrated education is defined in section 1 of the Integrated Education Act 2022: "Integrated education" means the education together, in an integrated school, of— (a) those of different cultures and religious beliefs and of none, including reasonable numbers of both Protestant and Roman Catholic children or young persons; (b) those who are experiencing socio-economic deprivation and those who are not; and (c) those of different abilities. Departmental guidance provides: "Department of Education Position on 'Reasonable Numbers' While a rigid approach should not be taken to 'reasonable numbers,' what constitutes reasonable numbers should be considered having regard to, the intention of the 1989 Order, the NICIE Statement of Principles, and the underlying rationale of contact theory that there should be a reasonable balance between Protestant and Catholic children. The statement that follows in italics is the general principle that will be applied in the context of proposals to Transform to Integrated status. <i>General Principle To ensure the process of Transformation is both well-grounded at the outset and capable of developing over time, the Department will expect, as a general principle, the proposer to provide evidence that the school is likely to be able to attract at least 10% of its total year 1 or year 8 from the minority religion, or in those schools seeking to transform to Integrated status, 15% of the combined number of Protestant and Catholic year 1 or year 8 pupils, in the first year of Transformation. There may be exceptions to this general principle however, and each case will be considered in its own unique circumstances regardless of the percentage of Protestant and Catholics evidenced by the proposer. Evidence is also required that this is likely to increase over the next 7 years to achieve reasonable numbers from the minority religion and an aspiration for the relative proportions of the two groups to be similar.</i>
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	As will be noted, this involves a two-stage test to inform the analysis. First, is the school “likely to be able to attract at least 10% of its total year 1 or year 8 from the minority religion, or in those schools seeking to transform to Integrated status, 15% of the combined number of Protestant and Catholic year 1 or year 8 pupils, in the first year of Transformation.” Second, and more importantly as it relates more closely to the statutory test, is there evidence that this is likely to increase over the next 7 years to achieve reasonable numbers from the minority religion and an aspiration for the relative proportions of the two groups to be similar? <u>Integrated schools and religious balance</u> It is sometimes suggested that post-transformation schools become more religiously mixed because of measures that are put in place. It is uncontroversial to note that this is normally, though not invariably, the case. The more relevant question is whether they generally become sufficiently religiously mixed in order to satisfy the statutory reasonable numbers test. A recent analysis of the figures indicated that the latter is not the case. At present no integrated school meets the aspiration of the minority Catholic or Protestant community representing 40% of all children at a school. Of those schools which have transformed, 31 out of 33 (93.9%) have a minority population under 25% of the school community. Of the 71 integrated primary and post-primary schools, (48, or 67.6%) saw a decrease in the percentage of pupils from the minority religious community in 2025/26 from 2024/25¹, while (23, or 32.4%) saw an increase. The Department’s reasonable numbers assessment also set out an analysis of the trends and numbers in relation to those schools which have transformed. As the Court of Appeal has observed, “The statistics demonstrate that in some schools transformation has had a significant impact in addressing religious balance at the school. In other schools there has been no or little improvement in religious balance. We accept, as a matter of common sense, that transformation to integrated status has the potential to increase the number of students from an under-represented religion at a particular school. Ultimately, whether this is likely to be achieved remains a matter of judgement in each case.”
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¹ In two schools, the minority religion switched between years (from Protestant to Catholic, or vice versa) due to small changes in the relative proportions of Catholic and Protestant pupils. As a result, the minority percentages compared across years for these schools do not refer to the same religious group.

	The most recent statistics, therefore, support the Court of Appeal's observation that there is no general rule that transformation will lead to the achievement of reasonable numbers. The question must be determined on the individual merits of each case and the evidence available in respect of the particular school. <u>Is the first limb of the test satisfied in this case?</u> In the 2025/26 school year, there were six Catholic pupils in Year 1, representing 8.22% of the cohort. The combined proportion of Protestant and Catholic pupils in Year 1 for the same year reached 14.29%, below the minimum thresholds of 10% and 15% outlined in the Written Ministerial Statement (WMS) of 4 September 2025 setting out what a school is expected to meet in the first year of Transformation. However, in the past six years from 2020/21, the school has exceeded 10% of Catholic pupils in Year 1 on three occasions and has exceeded the 15% of combined Protestant and Catholic pupils in four of those years. It would be surprising if there was not some initial boost from transformation to integrated status, I am therefore satisfied that the first limb of the test has been met. <u>Are there presently reasonable numbers in the school?</u> From 2020/21 until 2025/26 the number of Catholic pupils has remained fairly consistent between 12.30% and 13.45%. Applying the statutory test informed by having regard to the intention of the 1989 Order, the NICIE Statement of Principles, and the underlying rationale of contact theory that there should be a reasonable balance between Protestant and Catholic children I conclude that the school does not presently have reasonable numbers of Catholic children. <u>What is the basis to believe that reasonable numbers of Catholic children are likely?</u> The central question is, therefore, whether reasonable numbers are likely to be achieved in some reasonable period. In doing so, without adopting a rigid approach, I again have regard to the intention of the 1989 Order, the NICIE Statement of Principles, and the underlying rationale of contact theory that there should be a reasonable balance between Protestant and Catholic children. I have considered the Case for Change and other representations (in particular those of the section 3 bodies) to assess whether the Article 92(6) test is satisfied. The most favourable factors in considering the test are;
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	(a) an acceptance that post-transformation, it would be expected that the number of Catholic children would increase, (b) the Expressions of Interest, (c) the transformation plan. The issue of a post-transformation boost in Catholic numbers – even if accepted as a matter of common sense – falls short of evidence that this would achieve reasonable numbers of Catholic children. At paragraph 103, officials note the “While there are encouraging indicators – including parental demand, historic trends, and planned actions – the current evidence does not provide clear or definitive assurance that this requirement will be met in the event of transformation.” The ballot result provides evidence of the unmet parental demand for Integrated Education within the existing school community. Out of 872 persons eligible to vote, 572 returned ballot papers representing 65.9% turnout. Out of those who responded, 76.7% (441 people) voted yes (50.5% of all electors), whilst 23.3% (134) voted no. 12.3% of the children in the Downshire District Electoral Area are designated as Catholic. This broadly accords with the percentage of children at the school. To constitute reasonable numbers the share of Catholic children at the school would need to significantly exceed the share of Catholic children in the District Electoral Area. This is a challenging target. The school is already performing relatively well in attracting a share of Catholic children consistent with the share in the wider population. The Department received Expression of Interest forms outside the Department’s statutory two-month objection period however as a decision had not been taken on the proposal I will consider them as part of the application. I welcome the provision of this information as a way to gauge potential interest – though obviously by their nature are neither firm commitments nor conclusive evidence. I believe the most relevant statistic is that the parents of 61 Catholic children have indicated an interest in attending the school were it to become integrated (there are presently 70 Catholic children at the school). It is unclear if this captures parents who would not consider the school were it not to become integrated. I put less weight on the fact that this represents 21% of the children captured in the survey as there is unlikely to be as significant a response rate from those who are already likely to attend the school.
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	It is also worth noting that the question does not precisely relate to the statutory test though it might better capture the intention of the legislation than an overly literal interpretation. There is nothing in the section 3 bodies' responses that provides compelling evidence that the reasonable numbers test is likely to be met. There are three integrated schools within a six mile radius - Fort Hill IPS, Oakwood IPS and Rowandale - the latter two being Grant Maintained Integrated Schools which tend to have a better religious balance (though the Protestant minority at these schools was under 25% in one case and under 20% in the other). Fort Hill transformed in 2009 and reached 15% Catholic pupils in 25/26. In so far as these statistics are of any assistance they would not assist a conclusion that the reasonable numbers test has been satisfied. I conclude that while a number of factors (including those cited above) can be argued in favour of the proposal these matters demonstrate no more than the possibility of future growth. The statutory test requires more than possibility. It requires me to be satisfied that it appears likely that the school will provide integrated education. There is no established trend demonstrating movement towards reasonable numbers, nor is there persuasive evidence that the Catholic population within the wider catchment area is likely to translate into enrolment at the scale required. The transformation plan sets out aspirations and proposed actions, but it does not provide a sufficient evidential basis for concluding that reasonable numbers are likely to be achieved. The parental ballot demonstrates support for transformation. It does not, however, demonstrate that the statutory requirement concerning reasonable numbers is likely to be met. In the absence of the EOI information, I would have no hesitation in concluding that the reasonable numbers test has not been met. However, I believe some weight should be given to this updated information. The real issue is whether it is sufficient to displace the initial analysis. Ultimately I agree with the officials' original conclusion that, "the key consideration is whether the school is likely to provide integrated education in practice, including achieving and sustaining "reasonable numbers" of both Protestant and Catholic pupils. While there are encouraging indicators – including parental demand, historic trends, and planned actions – the current evidence does not provide clear or definitive assurance that this requirement will be met in the event of transformation."
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	Taken collectively, the evidence does not establish that the achievement of reasonable numbers of Protestant and Roman Catholic pupils is likely. I therefore cannot be satisfied that the school would be likely to provide integrated education within the meaning of the legislation. The proposal must accordingly be refused. I should add that nothing in this conclusion prevents the school bringing a further application which is grounded in further evidence. In considering such an application considerable weight would be given to evidence that the statutory test is likely to be met.	
Additional notes		
Information redacted	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.	
	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

From: Clare Foley
Area Planning Policy Team (East Region)
(Cleared by Scott Harbinson – 2 July 2026)
(Cleared by Sharon Smyth – 2 July 2026)

Date: 2 July 2026

To: Paul Givan MLA
Education Minister

Copy distribution below

**DEVELOPMENT PROPOSAL (DP) 735 – Downshire Primary School
Transformation to Controlled Integrated Status**

Issue: To decide on the following Development Proposal (DP) 735:

“Downshire Primary School will transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter.”

Timescale: Routine

Financial/Resource Implications: Resource / Capital - There are no capital costs associated with this proposal.

Transport - It is possible that transformation may lead to an increase in the number of pupils requiring transport, but this is unlikely to be significant.

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

Statutory Duty Implications: Article 64 of the Education Reform (Northern Ireland) Order 1989.

Article 92 of the Education Reform (Northern Ireland) Order 1989

The Integrated Education Act (Northern Ireland) 2022

Article 44 of the Education and Libraries Order 1986.

Section 75 of the Northern Ireland Act 1998.

The Rural Needs Act (Northern Ireland) 2016.

This submission takes account of the Court of Appeal judgement on DP 727 (JR 335 - Bangor Academy) and DP 728 (JR 336 - Rathmore Primary School).

**Presentational
Issues:**

It is likely that there will be local stakeholder and media interest in your decision. If approached, the Press Office can draw from this submission.
Cleared by Press Office (RB 02/07/26)

Recommendation:

It is recommended that you:

- i. consider the evidence set out in this submission and appendices to inform your decision on DP 735; and
- ii. Agree that this submission (with the appropriate redactions) will be published on the Department's website once the Education Authority (EA) and the school have been informed.

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Appendices (Separate attachment)

Appendix A:	Copy of Published Development Proposal (DP) 735
Appendix B:	Case For Change for DP 735 Including Transformation Action Plan (TAP)
Appendix C:	Key Statistical Data including Statutory Objection Period Responses for DP 735
Appendix D:	Statutory Objection Period Responses
Appendix E:	DE Policy Team Comments
Appendix F:	Education & Training Inspectorate Comments
Appendix G:	Letter & Reply - Chair of the Board of Governors

Introduction

1. On 11 September 2024 Development Proposal (DP) 735 was published by the Education Authority (EA), on behalf of the Board of Governors (BoGs) of Downshire Primary School (PS), which states: -

“Downshire Primary School will transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter”.

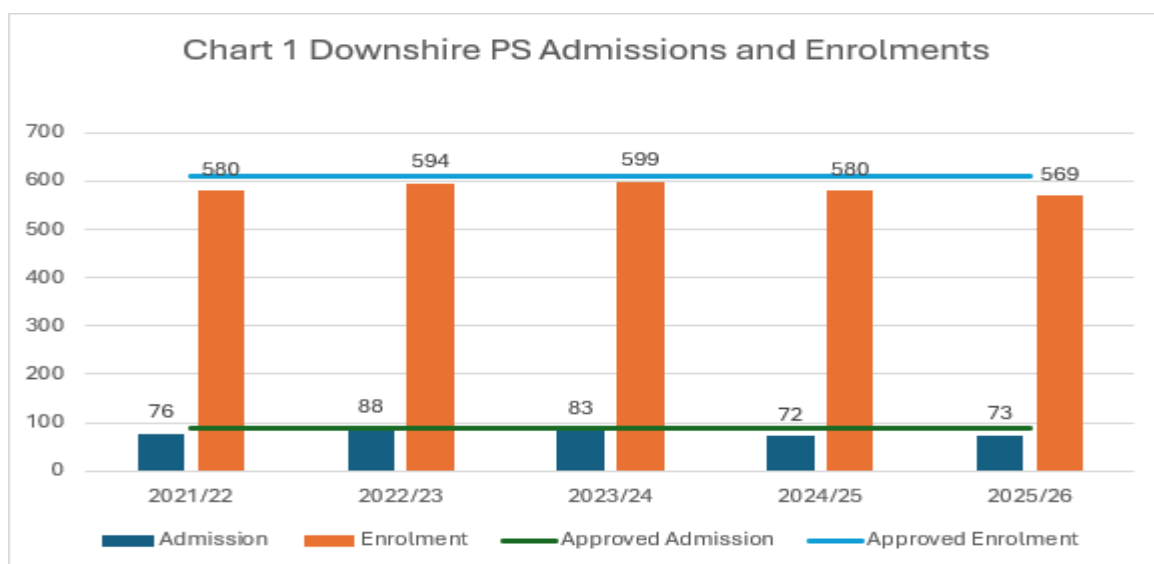
2. The two-month statutory objection period for the proposal ran from 11 September 2024 and ended on the 11 November 2024. A copy of the published DP and the proposer's Case for Change (CfC) are attached at **Appendix A** and **Appendix B** respectively.
3. The assessment of this DP has been impacted by the Judicial Reviews (JR) JR335 and JR336 and the subsequent appeals.

Background - Downshire Primary School

4. Downshire PS is a Controlled, co-educational primary school located at Ballynahinch Road, Hillsborough, established on 1 September 2005 following the amalgamation of Hillsborough PS and Newport PS.
5. The 2025/26 school census data evidence that there were:
 - 569 total pupils (including children with a statement of special educational need (SEN)) enrolled at the school;
 - 28 pupils with a statement of SEN;
 - 28 (4.92%) pupils entitled to free school meals (FSME); and
 - 282 Protestant pupils, 70 Catholic pupils and 217 pupils designating as 'Other'.

Admissions & Enrolment

6. The 2025/2026 approved admissions and enrolment numbers for Downshire PS are 87 and 610 respectively.
7. At the close of the 2026/27 admissions process, Downshire PS received 67 preference first applications and two other preferences.
8. [Chart 1](#) below illustrates the pattern of admissions and enrolments at Downshire PS over the last five years. The school has admitted less than its approved admissions number (87) in four of the last five years. However, the school's actual enrolment of 569 for 2025/26 is significantly above the Sustainable Schools Policy (SSP) minimum recommended enrolment of 105 for a sustainable rural primary school.



Source: DE Census Data

9. The school operates with a statutory nursery unit (NU) which provides 52 part-time places operating morning and afternoon sessions. The NU has been fully subscribed in four of the last five academic years, however in three of the last six years the NU has admitted underage pupils. Downshire PS NU received 63 first preference applications and 68 preferences in total for 2026/27.

Integrated Education - Legislation and Case Law

10. The legislative process for proposals for transforming to integrated status is outlined in the Education Reform (Northern Ireland) Order 1989².
11. Article 64(1) of Order states: *'It shall be the duty of the Department to encourage, facilitate and support the development of integrated education, and to provide support for integrated education.'*
12. The Integrated Education Act (Northern Ireland) 2022 came into operation on 26 October 2022. It amends the definition of Integrated education and what it means to be an Integrated school.
13. Section 4 of the Act has amended Article 64 of the Education Reform (Northern Ireland) Order 1989 in respect of the Department's statutory duty towards integrated education; the duty has been amended to "encourage, facilitate and support the development of integrated education". "Support" is defined in Section 5 of the Act.
14. The Department's assessment of Downshire PS in the context of DP 735 to transform to Controlled Integrated status, takes due account of the information and evidence gathered in this report and associated appendices, together with the Department's 'duty' under Article 64.

² [The Education Reform \(Northern Ireland\) Order 1989](#) (Chapter II)

15. In terms of ‘Proposals for acquisition of controlled integrated status’ Article 92(6) of the 1989 Order states that *‘the Department shall not approve a proposal under this Article in relation to a school unless it appears to the Department that, if the school were to become, or be established as, a controlled integrated school, the school would be likely to provide integrated education’*. Article 92(7) states that *‘[t]he Department shall not approve a proposal ... in relation to a school unless the school was eligible for controlled integrated status on the date on which the proposal was submitted under that paragraph’*.
16. Section 1(1) of the Integrated Education Act (Northern Ireland) 2022³ defines integrated education as: *‘the education together, in an integrated school, of—*
 - (a) those of different cultures and religious beliefs and of none, including reasonable numbers of both Protestant and Roman Catholic children or young persons;*
 - (b) those who are experiencing socio-economic deprivation and those who are not; and*
 - (c) those of different abilities.’*
17. In order to progress plans to bring forward a DP to transform to controlled integrated status, the Education Reform (Northern Ireland) Order 1989 requires a ballot to be held in which every parent with a pupil currently attending the school is eligible to vote. At least 50% of those eligible to vote must do so and there must be a simple majority in favour of applying for the transformation.
18. Details of the Downshire PS’ Parental Ballot are included in the CfC. 69.9% of parents voted. The turnout and result of the parental ballot indicate that 76.7% of the 69.9% (a total of 441 votes out of 575 votes cast) were in favour of transforming.
19. The recent Court of Appeal judgement on the outcome of DP 727 (Bangor Academy and Sixth Form College) and DP 728 (Rathmore Primary School) recognised the tension between the Department’s duty under Article 64 of the 1989 Order to encourage, facilitate and support integrated education and the statutory requirement under Article 92(6) that a proposal may only be approved where it appears likely that the school will provide integrated education. While Article 64 provides a clear policy direction in favour of transformation, the Court confirmed that Article 92(6) remains a **mandatory statutory test which must be satisfied**. In practice, this means that although the Department is required to support the development of integrated education, proposals cannot be approved unless “reasonable numbers” of both Protestant and Catholic pupils are likely to be achieved.
20. The Court also confirmed that the assessment under Article 92(6) is inherently forward-looking, requiring the Department to make a judgement as to whether the school is likely to provide integrated education over time rather than to

³ [Integrated Education \(Northern Ireland\) Act 2022](#)

demonstrate certainty at the point of decision. This involves an element of evaluative judgement, informed by available evidence including demand indicators, planned actions and local context.

Integrated Education - Guidance

21. In May 2026, the Department published [Integrated Education Demand Evidence Insights and Limitations](#) to ensure decisions on Integrated Education are being informed by robust, system-wide analysis.
22. The Department's [Transforming Together - Understanding the Pathway to Integrated Education](#)⁴ (updated and published on 25 February 2026 which supersedes Integration Works – Transforming your School 2017) outlines the legislative and policy areas the Department will take into consideration when assessing DPs for transformation. These are:
 - planning and engagement in the transformation process;
 - provision of Integrated Education
 - sustainability;
 - demand for integrated education; and
 - area planning context.
23. The [Transforming Together - Understanding the Pathway to Integrated Education](#) guidance outlines the Department's position on 'reasonable numbers' in respect of section 1(1)(a) of the Integrated Education (Northern Ireland) Act 2022 as outlined in [Paragraph 16](#) above.
24. The guidance states that; '[t]o ensure the process of transformation is both well-grounded at the outset and capable of developing over time, it is expected, as a general principle, the proposer to provide evidence that the school is likely:
 - (i) to be able to attract at least 10% of its total year 1 (for Primary) from the minority religion, or 15% of the combined number of Protestant and Catholic year 1 pupils, in the year following achieving Integrated status i.e. within the first year 1 intake of pupils who have gone through the admissions process with the school listed as an Integrated school; and
 - (ii) to increase over the next seven years to achieve reasonable numbers from the minority religion and an aspiration for the relative proportions of the two groups to be similar.
25. Using the information provided in the CfC⁵ and the updated information and Transformation Action Plan (TAP) provided in **Appendix C**; the assessment of DP 735 will be carried out against the five areas listed in [paragraph 22](#). It will also take cognisance of the general principle in terms of reasonable numbers and reflect the findings in the recent Court of Appeal judgement.

⁴ It is noted that DP 735 was developed and progressed in advance of the publication of the revised guidance.

⁵ See separate Submission Appendices (Appendix B – Case for Change (CfC))

Planning and Engagement in the Transformation Process

26. The Department's [Transforming Together - Understanding the Pathway to Integrated Education](#) guidance requires evidence of the school's commitment to Integrated education and its potential to become a sustainable Integrated school. The guidance highlights that the interests of pupils (rather than institutions) must be at the centre of a school's approach. As part of the CfC, schools are required to provide the Department with:-
- A report on the initial exploration phase.
 - A copy of the Transformation Plan.
 - Details of cultural and operational changes, as well as any training completed, to date.
27. Details of the activity and engagement the school has taken forward is provided in the CfC and in the TAP.
28. The Northern Ireland Council for Integrated Education (NICIE) has confirmed in its commentary that *"School leaders and staff in Downshire PS have demonstrated enthusiastic and sustained engagement with officers from NICIE and EA ([Shared Education and Sectoral Support Team] (SESS); and the school's Transformation Plan demonstrates its commitment to the continued development of this following transformation. Significantly, the school is working to adopt the NICIE Statement of Principles, which brings the legal definition and purpose of Integrated Education to life in the active and intentional development of the school's ethos."*
29. The 3-year TAP covers four themes (i.e. learner centred; high quality teaching; effective leadership; and community connections) and details actions to ensure 'families feel comfortable sharing their cultural identity, supporting understanding of cultural and religious diversity within the school, and celebrating the rich diversity of identities, religions and beliefs as the school becomes more intentional in its work'. The plan however does not provide an evidential basis to satisfy the requirements of section 1(1)(a) of the Integrated Education Act (Northern Ireland) 2022⁶ as outlined in [paragraph 16](#).

Provision of Integrated Education

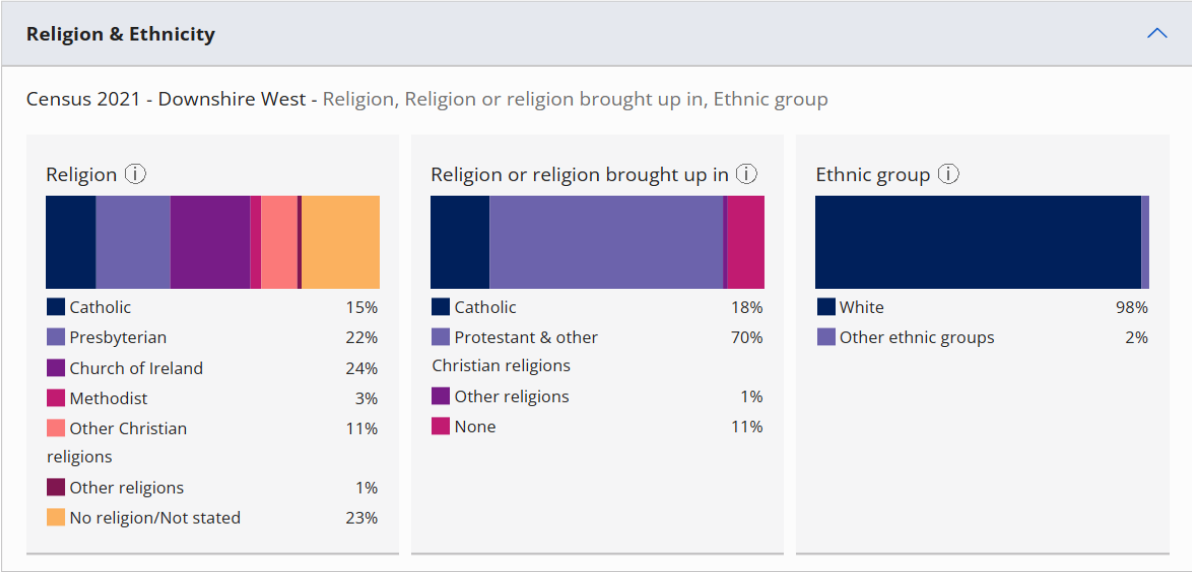
30. The background of the Integrated Education Act (Northern Ireland) 2022 and definition of Integrated Education and an Integrated school can be found at **Appendix C** alongside a full assessment of Downshire PS against the criteria.

Demographics of the Local Area

31. The illustration below shows the demographics of the Downshire West District Electoral Area (DEA) (where Downshire PS is located). Using the 'Religion' illustration below, it shows that overall, there is approximately 15% Catholic; 49% Protestant; and 35% 'Other'. The overall trend mirrors that of the Lisburn and

⁶ [Integrated Education \(Northern Ireland\) Act 2022](#)

Castlereagh LGD (as shown in Appendix C), highlighting the local demographic pattern - Protestant as the majority, Catholic as the minority.



Source: NISRA Census 2021 - [Downshire West Census Data](#)

32. [Table 1](#) below compares the religious composition of pupils in Downshire PS with the demographic profile of its respective DEA – Downshire West. As noted, the Catholic representation is generally a minority in this area. It shows that the school religious representation is generally in line with the DEA.

Table 1 – Downshire PS DEA Religious Breakdown 2025/26

School	Protestant (School)	DEA	Roman Catholic (School)	DEA	Other / No religion (School)	DEA	Total (School)
Downshire PS	282 (49.56%)	49%	70 (12.30%)	15%	217 (38.14%)	35%	569

33. **Appendix C** provides an assessment of the religious data of the alternative integrated primary provision in the area against the religious composition of the area.
34. A significant proportion of pupils currently designate as ‘Other’ or choose not to disclose their religious background, and which may not fully reflect their true identity or the tradition they were brought up in.
35. The Department will consider evidence of how a school intends to attract pupils from the minority religious community. The TAP sets out a range of measures designed to help the school engage more effectively with underrepresented groups and make it a more attractive choice for families from the minority religion. These include introducing sacramental provision, giving greater recognition to different faiths and traditions within the curriculum, providing anti-bias training for

staff, and strengthening links with the wider community through outreach and engagement activities.

36. NICIE in its commentary states *“Whilst the religious diversity of the school could be described as reasonable for a controlled school in the area, the school has acknowledged in the CfC that this is an area which requires their attention during the transformation journey to become a controlled Integrated school. There are specific references to and associated actions in the Transformation Plan that are designed to increase the levels of religious diversity in the school, with an intentional focus on encouraging more families from a Catholic background to apply for a place in the school”*.
37. The TAP confirms this by stating that the school would further like to increase the percentage of pupils with a Catholic background attending by teaching the sacraments as part of the school day.
38. Additionally, the CfC acknowledges that, *“As the school moves towards Integration the values and ethos need to be revised to further reflect the new outlook. Governors also need to look at the current Admissions Criteria to ensure that that the school is open to all.”* Therefore, there is an awareness that the school's admissions criteria will need to be revised to ensure inclusivity for all applicants.

Sustainability

39. An essential consideration for the Department is that the school will be viable and sustainable for the long term. All proposals are assessed against the criteria and indicators in the SSP.
40. Whilst the school's actual admissions and enrolment have been below its preset approved numbers for most of the last five years, its enrolment numbers are above the SSP recommended minimum threshold (i.e. 140 for a sustainable urban primary school). The sustainability assessment of the school, as set out in Appendix C shows that the school would be deemed sustainable at the present time, albeit with the school holding a significant deficit of -£864,109 at 31 March 2026.
41. In regard to the provision of integrated education, however, the Court of Appeal's judgement outlines the Department's duty to evaluate whether the school is likely to provide integrated education over time rather than to demonstrate certainty at the point of decision. This will be further explored in the section on **Demand for Integrated Education** below.

Demand for Integrated Education

42. The Integration Education (Northern Ireland) Act 2022 section 5 (1) states that a reference to 'support for' integrated education is a reference to **(emphasis added)**—
*‘(a) identifying, assessing, monitoring and aiming to meet the demand for the provision of integrated education **within the context of area planning and***

- the overall sustainability of the school estate (including, in particular, monitoring the number and success of applications for integrated education), and*
- (b) providing sufficient places in integrated schools to aim to meet the demand for integrated education **within the context of area planning and the overall sustainability of the school estate** (including examining evidence of expected future demand)’.*
43. The Integrated Education (Northern Ireland) Act (2022) also states that; ‘a reference to ascertaining the demand for integrated education is a reference to ascertaining the extent to which parents would prefer their children to be educated at grant-maintained integrated or controlled integrated schools rather than at schools which are not grant-maintained integrated schools or controlled integrated schools’.
44. The [Integrated Education Demand Evidence Insights and Limitations](#) outlines that at Northern Ireland Wide level:
- enrolments of pupils in years 1 to 7 declined for the eighth consecutive year (which is consistent with the continuing reduction in the number of children aged four to ten in the wider population);
 - the primary school population is projected to decline by 15.3% between 2023/24 and 2030/31 (reflecting sustained decreases in the birth rate over the last decade); and
 - for the Integrated sector continued growth in parental preference may offset some of the effects of wider population decline although overall demographic trends will remain a fundamental determinant of future system wide capacity.
45. In assessing parental demand for Integrated Education in the school’s area, evidence can be demonstrated in a range of ways, including, but not limited to:
- published surveys and reports related to demand for Integrated Education;
 - school preference and parental survey responses as expressed via the EA school admissions portal;
 - the results of the Transformation ballot;
 - the availability of Integrated Education in the local area, including oversubscription at local Integrated schools; and
 - expression of interest forms collected from the locality.
46. The CfC details, in respect of the transformation ballot, that “*alongside this positive support from parents of children at the school, possible future parents at the school and within the wider community, the Governors have been pleased to note the positive response that has been received within the local community*”.
47. The recent Court of Appeal emphasised that evidence of general parental demand or support for transformation, while relevant, is not sufficient in itself to satisfy Article 92(6). In particular, it highlighted the importance of demonstrating

the likelihood of increased participation from the minority community, noting that the assessment must focus on whether reasonable numbers from that group are likely to be achieved.

48. In considering the evidential basis for likely future enrolment patterns, the Court attached significant weight to the presence or absence of concrete evidence, including Expression of Interest (EOI) forms and demonstrable engagement with the minority community. In the cases considered, the absence of such evidence was a key factor in concluding that the statutory test was not met. In contrast, the provision of EOI data and evidence of targeted engagement activity provides a more robust basis on which to assess the likelihood of achieving reasonable numbers over time.
49. While Downshire PS did not submit EOI forms with the CfC or during the Statutory Objection Period, they did forward information before a decision was made on this proposal (**Appendix C**). Based on the responses received, the religious identity designation of the 281 children whose parent or guardian expressed an interest in sending a child to Downshire PS, should it become integrated, reflects a diverse community background.
50. This distribution reflects representation from both main traditions, alongside a notable proportion of mixed and other backgrounds. Of 281 children, 21.7% of those who had replied were Catholic.
51. Downshire PS attracts pupils from a Catholic background in an area which is predominately Protestant population. From 2020/21 until 2025/26 the number of Catholic pupils has remained fairly consistent between 12.30% and 13.45% and the Protestant pupils ranged between 49.56% and 56.50%. The pupil designating as 'Other' has risen slowly year on year from 30.14% (2020/21) to 38.14% (2025/26).
52. Table 3 in **Appendix C** indicates that in the 2025/26 school year, there were six Catholic pupils in Year 1, representing 8.22% of the cohort. The combined proportion of Protestant and Catholic pupils in Year 1 for the same year reached 14.29%, below the minimum thresholds of 10% and 15% outlined in your Written Ministerial Statement (WMS) of 4 September 2025⁷ setting out what a school is expected to meet in the first year of Transformation.
53. However, in the past six years from 2020/21, the school has exceeded 10% of Catholic pupils in Year 1 on three occasions and has exceeded the 15% of combined Protestant and Catholic pupils in four of those years.
54. Table 3 in **Appendix C** shows that the proportion of Catholic pupils within the Year 1 intake has fluctuated over the period. While earlier years indicate that the school was broadly meeting, or close to, the Department's indicative thresholds, there was a decline in 2022/23 followed by an increase in 2024/25. The most recent data for 2025/26 indicates a further reduction. Overall, the trend does not demonstrate consistent upward growth.

⁷ [Written Ministerial Statement – Reasonable Numbers | Department of Education](#)

Alternative Primary Provision

55. To satisfy the duty under the Integrated Education (Northern Ireland) Act Section 5 (1)(a) and (b) (as outlined in [paragraph 16](#) above), it is important to look at alternative provision in the local area. Key statistical data including Alternative Primary Provision is provided in **Appendix C**.
56. [Map 1](#) illustrates the location of Downshire PS and alternative primary provision within a five-mile mapping radius. As there is only one existing integrated school within a five-mile radius, integrated provision within a six-mile radius was also considered. It also shows that the Hillsborough area offers significant primary education provision. There are 15 Controlled schools within a five-mile radius and in 2025/26 there were 786 pupils enrolled in the 812 approved places. There are three Catholic Maintained schools with 895 pupils enrolled in the 1030 approved places.
57. Within a six-mile radius there are three Integrated Primary Schools (IPS) which in 2025/26 had 786 pupils enrolled in the 812 approved places. There is no Irish-medium Provision in the area.
58. Table 1 in **Appendix C** (snapshot) illustrates the enrolment trends at these integrated schools, and [Table 2](#) below shows an application history across three integrated primary schools. They both indicate that the integrated schools tend to fill close to or above their approved admissions numbers.
59. [Table 2](#) below demonstrates that admissions and enrolment trends of existing integrated provision, along with the trends in first preference applications are suggestive of demand for integrated education in the area. Transformation of Downshire PS, if approved, would be expected to have little to no impact on the nearest integrated schools. It indicates that demand for the three alternative Integrated primary schools remains generally stable and broadly aligned with existing capacity.

Table 2: Alternative Integrated Provision 1 st Preference Applications and Admission Trends									
School Name & Postcode	Appr'd Adm Number	2022/23 Total 1st Pref. Apps	2022/23 Actual P1 Adm (incl. S'numerary pupils)	2023/24 Total 1st Pref. Apps	2023/24 Actual P1 Adm (incl. S'numerary pupils)	2024/25 Total 1st Pref. Apps	2024/25 Actual P1 Adm (incl. S'numerary pupils)	2025/26 Total 1st Pref. Apps	2025/26 Actual P1 Adm (incl. S'numerary pupils)
Fort Hill IPS	30	27	30	27	31	27	31	29	28
Oakwood IPS	29	29	27	28	28	29	29	24	25
Rowandale IPS	57	48	50	59	58	47	53	53	53

Source: EA Primary School Admissions Office
Source: School Census Return
Inclusive of SEN pupils

60. Analysis of the table below demonstrates the religious breakdown at the alternative integrated schools since transformation or opening. Only Fort Hill IPS is a transformed school.

Table 3 – Religion Comparisons from transformation/opening to 2025/26

School	Year	Protestant (year transformed/opened)	Protestant (25/26)	Roman Catholic (year transformed/opened)	Roman Catholic (25/26)	Other / No religion (year transformed/opened)	Other / No religion (25/26)
405-3308 Fort Hill PS	2009	73%	41.67% (-31.33)	4%	15.28% (+11.28)	23%	43.05% (+2.05)
406-6611 Oakwood IPS	GMI – not transformed 1999	35%	18.23% (-16.77)	51%	41.99% (-9.01)	14%	39.78% (+25.78)
406-6682 Rowandale IPS	GMI – not Transformed 2007	44%	23.65% (-20.35)	44%	39.07% (-4.93)	11%	37.28% (+26.28)

61. Provision in the area is considered in full at **Appendix C**. The snapshot at Table 1 in Appendix C sets out the statistical data including admissions and enrolment details for schools and the latest Education and Training Inspectorate (ETI) assessments.
62. In summary, of the 21 schools:
 - The area is well served with schools between all sectors with the exception of IM schools;
 - 19 schools were above the recommended minimum sustainability enrolment threshold for an urban or rural school;
 - Two schools were below the recommended minimum sustainability enrolment threshold for an urban or rural school; and
 - There were 899 available places overall and 79 places were available in the integrated sector.

Area Planning Context

63. As outlined in the Integrated Education (Northern Ireland) Act 2022 (section 5 (1)), the area planning context must be taken into consideration when identifying the Department's duty to support integrated education.
64. The assessment includes how the proposal aligns with the current Strategic Area Plan and Operational Plan and how it will contribute to the delivery of sustainable education provision within the geographical area and school estate. Details can be found in **Appendix C – Strategic Area Plan**.
65. Downshire PS is situated in the Lisburn and Castlereagh Local Government District (LGD). On the Northern Ireland Multiple Deprivation Measure 2017 the Hillsborough 1 Super Output Area (SOA), in which the school is located, is placed 862 out of 890 (1 being most deprived and 890 least deprived).
66. The Northern Ireland Statistics and Research Agency (NISRA) 2018-based sub-national projections⁸ indicate that the number of children (i.e. those aged 0-15) in the Lisburn and Castlereagh LGD as illustrated in Chart 1 in **Appendix C**

⁸ [Local Government District Factsheets \(nisra.gov.uk\)](https://www.nisra.gov.uk/local-government-district-factsheets)

shows a reduction in the school age population for Years 1-7 from 13,410 (2022) to 12,622 (2035) representing a 6.2% decline. Chart 2 in **Appendix C** also shows that the population of 0–4-year-olds is projected to decline until 2032, after which it gradually begins to increase, continuing this upward trend to 2043.

67. [Table 4](#) below has been reproduced from the CfC and details the Northern Ireland Multiple Deprivation Measure for the six main wards from which Downshire PS attracts its pupils.

Table 4 - Northern Ireland Multiple Deprivation Measure (2017)								
Ward Name	Multiple Deprivation Measure Rank	Domain Ranking						
		Income	Employment	Health Deprivation and Disability	Education, Skills, and Training	Access to Services	Living Environment	Crime and Disorder
Hillhall	322	326	265	251	225	209	351	285
Blaris	329	318	300	334	234	259	157	147
Dromara	352	298	390	383	419	111	50	375
Ballymacbrennan	393	404	448	445	453	84	70	455
Ravernet	395	411	453	456	461	63	116	461
Maze	424	423	416	431	413	165	272	365
Hillsborough	431	387	451	448	455	180	186	361

68. In relation to **Area Planning Context**, in 2025/26 the integrated schools had collective approved admissions and enrolment numbers of 116 and 812 respectively. Collectively in 2025/26 they had actual admissions and enrolment totals of 108 and 786 with 53 supernumerary pupils and 79 available places. Additionally, the religious split across all three schools shows an overall balance of 221 Protestant pupils, 284 Catholic pupils and 269 'Other' pupils.
69. Enrolments and admissions at the closest Integrated schools over the past five years have remained steady.
70. There are also 18 alternative non-integrated primary schools within a five-mile radius of Downshire PS with 751 available places in 2025/26.
71. In relation to the areas to be considered by the Department for a successful Transformation, the evidence set out would indicate that Downshire PS has carried out planning and engagement activity towards the Transformation process and, in relation to the SSP, the school meets the sustainability criteria.
72. Given the projected decline in numbers of primary school children up to 2028 and beyond, and in the wider school estate context for the area, it is not possible to determine if the school can satisfy the requirements of Section 1(1) of the Integrated Education Act (Northern Ireland) 2022 as outlined in [paragraph 16](#) above.

73. More details on the assessment against the transformation areas can be found at **Appendix C**. Comments from other policy areas in the Department of Education can be found at **Appendix E**.

Statutory DP Processes

Pre-publication Consultation

74. The CfC details the various consultations undertaken between governors, staff and parents. It also details that class teachers have discussed Integration at age-appropriate levels with the children. The CfC states that *'The children have learnt about Integration through special assemblies and have discussed what it means to them.'*
75. The CfC confirms that equality screening of the proposal has been carried out as have the statutory requirements of the Rural Needs Act (Northern Ireland) 2016 (where appropriate).
76. In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, consultation on the proposal took place between 24 May 2024 to 21 June 2024 with schools and pre-schools which, in the opinion of the EA, might be affected by the proposal. No responses were received from affected schools. A response was received from the Controlled Schools' Support Council.
77. The full pre-publication consultation can be found in the CfC at **Appendix B**.

EA's Comments

78. The EA supports the proposal for Downshire PS to transform from controlled to controlled integrated status. The EA commented:

"Downshire PS is a sustainable school and maintains a healthy enrolment whose community breakdown and background is reflective of the area from where the school draws its pupils"; and "There are limited available places at integrated primary schools in the area but not enough to meet the demand expressed in the parental ballot for Downshire PS".

Two-Month Statutory Objection Period

79. The two-month statutory objection period on the proposal ran from 11 September 2024 until 11 November 2024.
80. During this period the Department received eight letters of objection, ranging from parents, staff members, a former staff member and local residents and three letters of support from the CSSC, NICIE and the IEF. Copies of the respective responses can be found in full at **Appendix D**.
81. Key themes of the letters of objection received from parents, staff members and residents can be found below.

Objections

82. Key Themes not in support:

- The school is already integrated in all but name and it widely represents the community with a lot of children attending from mixed marriages, other religions and no religions;
- There are a number of integrated schools in the area already to serve the families who wish to have an integrated education;
- If there is an integrated school in Hillsborough there is no choice for parents who do not wish their children to attend this school;
- By setting requirements/goals as to how many children from each side of the Community should make up the school could lead to a protestant child not getting a place in their local school because the school may need more catholic children to meet the goals set;
- Concern that the demands of implementing integration status are likely to overshadow the other needs of our school and impose a considerable workload on staff members at the potential expense of other priorities;
- I did not choose to work in the integrated sector. It's being pushed on me. I have worked in the school for 20 years and had no voice in this process to date;
- The vote was very rushed and there was a lot of pressure to vote yes. The current framework for transitioning to integration status does not include teachers in schools having a vote, despite the fact that they are significant stakeholders in the process;
- I applied to and have been teaching in a controlled primary school by choice;
- Does Downshire PS meet the criteria other than percentage of religion, for example do they have the split of teaching staff needed and if not, does that mean the school would have to either lose teachers or only employ those of another requirement to meet this Criteria in the future, which seems unfair;
- It is unethical to make over 700 children change uniforms. The costs associated with the change is also not welcome and all the redundant uniform would be wasted;
- There doesn't seem to be a demand for the sacraments, in a school of over 700, from what I have seen less 10 pupils per year; and
- The strong Christian ethos which Downshire PS has always fostered through school assemblies, RE lessons and Bible teaching could be diluted. Integration would further hinder the Christian gospel being taught at the school.

83. The Department wrote to the BoG regarding several concerns raised by interested parties during the statutory objection period. The Department's letter and the BoG response are available in **Appendix G**.

Integrated Education (Northern Ireland) Act 2022 Section 3

84. Article 64(1) of the Education Reform (Northern Ireland) Order 1989 states that. *'...the Department must in particular take account of any representations made under section 3 of the Integrated Education (Northern Ireland) Act 2022 (consultation) which relate to that duty.'*
85. *Section 3 of the Integrated Education Act states that; 'In exercising any functions relating to integrated education the Department of Education must consult with— (a)any body appearing to the Department of Education to have as an objective the encouragement or promotion of integrated education, and if required; (b)any other body the Department of Education considers appropriate'.*
86. The Department has identified NICIE, the Integrated Education Fund (IEF) and the Controlled Schools Support Council (CSSC) as relevant bodies for the purposes of such consultation.
87. The Department wrote to each of these bodies, seeking their views on DP 735 and those submitted in relation to the Integrated Education Act are summarised below but are set out in full at **Appendix D**.

CSSC Comments

88. CSSC comments are summarised below. The commentary *in support* of DP 735; is reproduced in full at **Appendix D**.
- CSSC recognises that Downshire PS already welcomes children from different socio-economic backgrounds, children with different abilities and children of all faiths and none, consistent with the definition of the IE Act;
 - CSSC notes the positive outcome of the parental ballot at Downshire PS and acknowledges the school's desire to have its inclusive ethos formally recognised through the process of Transformation as articulated in the case for change; and
 - CSSC supports Downshire PS in seeking to transform to controlled integrated status and believes that the development proposal will provide an efficient means by which formally recognised integrated provision can be increased in the area.

NICIE Comments

89. NICIE provided a composite supportive response to DP 735 which is attached in full at **Appendix D**.
90. The key points made by NICIE are summarised below:
- The ballot result provides evidence of the unmet parental demand for Integrated Education within the existing school community. Out of 872 persons eligible to vote, 572 returned ballot papers representing 65.9%

turnout. Out of those who responded, 76.7% (441 people) voted yes, whilst 23.3% (134) voted no;

- The nearest IPSSs, are Fort Hill IPS (4.6 miles away), Oakwood IPS (6.6 miles away) and Rowandale IPS (6.8 miles away) and there are insufficient available places within these schools to cater for the demand identified by Downshire PS within their school community;
- NICIE reproduced a Table (see below), provided by the school, showing a statistical summary of the school's profile in relation to the legal definition of an Integrated school in relation to Section 1 of the Integrated Education Act (Northern Ireland) 2022.

Table 5

Year	Free School Meals	SEN Stage 5/ Stage 3	SEN Stage 1 - 4 / 1-2	SEN All Stages	% Protestant	% Catholic	% Other Christian / non-Christian / no religion / unknown	% Newcomer
2015/16	7.06%	14	49	63	66.92%	11.13%	21.95%	*
2016/17	5.02%	12	61	73	65.95%	11.40%	22.65%	*
2017/18	4.17%	11	46	57	65.18%	11.66%	23.16%	0.00%
2018/19	5.35%	10	81	91	62.31%	12.77%	24.92%	*
2019/20	5.88%	13	62	75	58.27%	12.83%	28.90%	0.93%
2020/21	5.99%	8	73	81	56.29%	13.05%	30.66%	*
2021/22	6.21%	8	74	82	53.96%	13.61%	32.44%	*
2022/23	5.88%	20	54	74	53.25%	11.92%	34.83%	*
2023/24*	6.00%	25	25	65	51.20%	11.70%	27.2%	*
2024/25**	4.65%	24	46	70	58%	13%	29%	0.69%

*Number suppressed as less than 4 Source: EA and ** school's own data

- There are specific references to and associated actions in the Transformation Plan that are designed to increase the levels of religious diversity in the school, with an intentional focus on encouraging more families from a Catholic background to apply for a place in the school;
- The school has noted that it has lost potential pupils in the past due to the lack of Sacramental preparation within the school. Transformation is already going some of the way to address this issue and to encourage greater religious balance within the school. Sacramental preparation began in the school in September 2024 with twenty pupils within the school currently participating in this provision;
- If the proposal is approved, officers from NICIE and the EA Shared Education and Sectoral Support team (SESS) and other stakeholders will work alongside the school to reflect the requirement of The Education Reform (Northern Ireland) Order 1989 that the Board of Governors uses its '*...best endeavours, in exercising its functions under the Education Orders, to ensure that the management, control and ethos of the school are such as are likely to ensure the provision of integrated education.*' (Article 88);
- School leaders and staff in Downshire PS have demonstrated enthusiastic and sustained engagement with officers from NICIE and EA (SESS); and
- The school's Transformation Plan demonstrates its commitment to the continued development of this following transformation. Significantly, the school is working to adopt the NICIE Statement of Principles, which brings the legal definition and purpose of Integrated Education to life in the active and intentional development of the school's ethos.

IEF Comments

91. IEF comments are summarised below and full response is available at **Appendix D**:

- The proposal was submitted in response to parents at Downshire PS voting overwhelmingly by some 94% (of those who voted) in favour to take the school on the path of Transformation to Integrated status;
- The DP, and the detailed CfC document, highlights the high level of engagement with key stakeholders and support for the process of Transformation;
- IEF asserts that the school leadership team have shown commitment to the process throughout, ensuring that the decision to explore Transformation was made with consensus;
- The IEF would ask that DE takes this decision with regard to its statutory duty to “*encourage, facilitate and support integrated education*” and its Section 6 (Integrated Education Act 2022) duties relating to the development of Integrated Education;
- A positive decision will not only create new Integrated Education provision in the Hillsborough area, in response to the democratic wishes of parents, but will help the DE and the EA fulfil their statutory duty; and
- IEF recognise that the process of developing an Integrated ethos takes time and is a considerable change management process for the school.

Statutory Considerations

92. Statutory considerations relating to an assessment of a DP include:

- Article 44 of the Education and Libraries Order 1986.
- Section 75 of the Northern Ireland Act 1998.
- The Rural Needs Act (Northern Ireland) 2016.

93. An assessment of the statutory considerations is included at **Appendix C**.

Other Considerations

Resource

94. As this is an existing school, there are no significant costs relating to the Transformation.

Conclusion

95. The Department has statutory duties under Article 64 of The Education Reform (Northern Ireland) Order 1989 (as defined in [Paragraph 11](#)) and Article 92(6) of the 1989 Order (as defined in [Paragraph 15](#)).

96. Section 1(1) of the Integrated Education Act (Northern Ireland) 2022 provides a new definition of Integrated Education as per [Paragraph 16](#).

97. There is evidence to show the school is sustainable under the SSP at the present time, albeit with the school holding a significant deficit of -£864,109 at 31 March 2026. There is also evidence pertaining to Section 1(1) (b) and (c) of the Integrated Education Act (Northern Ireland) 2022.
98. In respect of Section 1 (1) (a) from 2020/21 to 2024/25 the school exceeded 10% of Catholic pupils in Year 1 on three occasions and has exceeded the 15% of combined Protestant and Catholic pupils in four of those years. However, in the 2025/26 school year, there were six Catholic pupils in Year 1, representing 8.22% of the cohort. The combined proportion of Protestant and Catholic pupils in Year 1 for the same year reached 14.29%, just below the minimum thresholds of 10% and 15% outlined in your WMS setting out what a school is expected to meet in the first year of Transformation.
99. The [Transforming Together - Understanding the Pathway to Integrated Education](#) outlines the Department's position on 'reasonable numbers' as follows:
- 'To ensure the process of Transformation is both well-grounded at the outset and capable of developing over time, the Department will expect, as a general principle, the proposer to provide evidence that the school is likely to be able to attract at least 10% of its total year 1 or year 8 from the minority religion, or in those schools seeking to Transform to Integrated status, 15% of the combined number of Protestant and Catholic year 1 or year 8 pupils, in the first year of Transformation.*
- There may be exceptions to this general principle however, and each case will be considered in its own unique circumstances regardless of the percentage of Protestant and Catholics evidenced by the proposer.*
- Evidence is also required that this is likely to increase over the next 7 years to achieve reasonable numbers from the minority religion and an aspiration for the relative proportions of the two groups to be similar'.*
100. When considering the local demographic breakdown of the area, it highlights Protestant as the majority, and Catholic as the minority mirroring that of the Lisburn and Castlereagh LGD. While it is noted that the Catholic representation remains a minority across both the LGD and DEAs, two of the alternative Integrated schools have a higher proportion of Catholic pupils than would be expected based on local demographics. These are, however, GMI schools that have not transformed.
101. Fort Hill IPS (which transformed) is operating at or slightly above its approved admissions and enrolment numbers, however just over 15% of pupils across Years 1-7 are from the minority religion in 2025/26 (see [Table 3](#)). [Table 6](#) below indicates that there are no minority religion pupils in its Year 1 intake this year. Although the proportion of minority religion pupils has increased from 4% at the time of transformation to 15.28% in 2025/26, progress towards a more balanced community profile appears limited. By contrast, both Rowandale IPS and Oakwood IPS (GMI schools) have attracted more minority religion pupils than

Protestant pupils with Catholic pupils accounting for 39.6% and 28.0% of their respective Year 1 intakes in 2025/26. Overall minority religion representation is also considerably higher in both schools, with Catholic pupils accounting for 39.6% and 41.99% of enrolment respectively. Notwithstanding this, both schools are operating below capacity in terms of overall enrolment and first-preference admissions for 2026/27.

Table 6 School	Protestant	Catholic (10% threshold)	Protestant & Catholic (15% threshold)	Other	No Religion	Unknown	Total
Fort Hill IPS	12	0 (0%)	12 (0%)	8	9	1	30
Rowandale IPS	5	21 (39.6%)	26 (80.8%)	6	17	4	53
Oakwood IPS	4	7 (28%)	11 (63.6%)	4	9	1	25

102. While EOI forms indicate some potential to attract more Catholic pupils, and Downshire PS has identified some steps to become more inclusive, the current enrolment largely mirrors the local demographic and the school's transformation plan does not set out clear steps to address this.

103. On balance, the proposal would support the Department's duty under Article 64(1) to encourage, facilitate and support integrated education, and is aligned with wider Executive priorities to expand integrated provision. However, in light of the Court of Appeal judgment and the requirements of Article 92(6), the key consideration is whether the school is likely to provide integrated education in practice, including achieving and sustaining "reasonable numbers" of both Protestant and Catholic pupils. While there are encouraging indicators – including parental demand, historic trends, and planned actions – the current evidence does not provide clear or definitive assurance that this requirement will be met in the event of transformation.

104. You are therefore invited to consider whether, on the basis of the available evidence and taking account of the WMS, you are satisfied that the statutory test is met.

Modification

105. If you are minded to approve DP 735, a modification to the implementation date would be required to 1 September 2027, or as soon as possible thereafter.

Recommendation

106. It is recommended that you:-

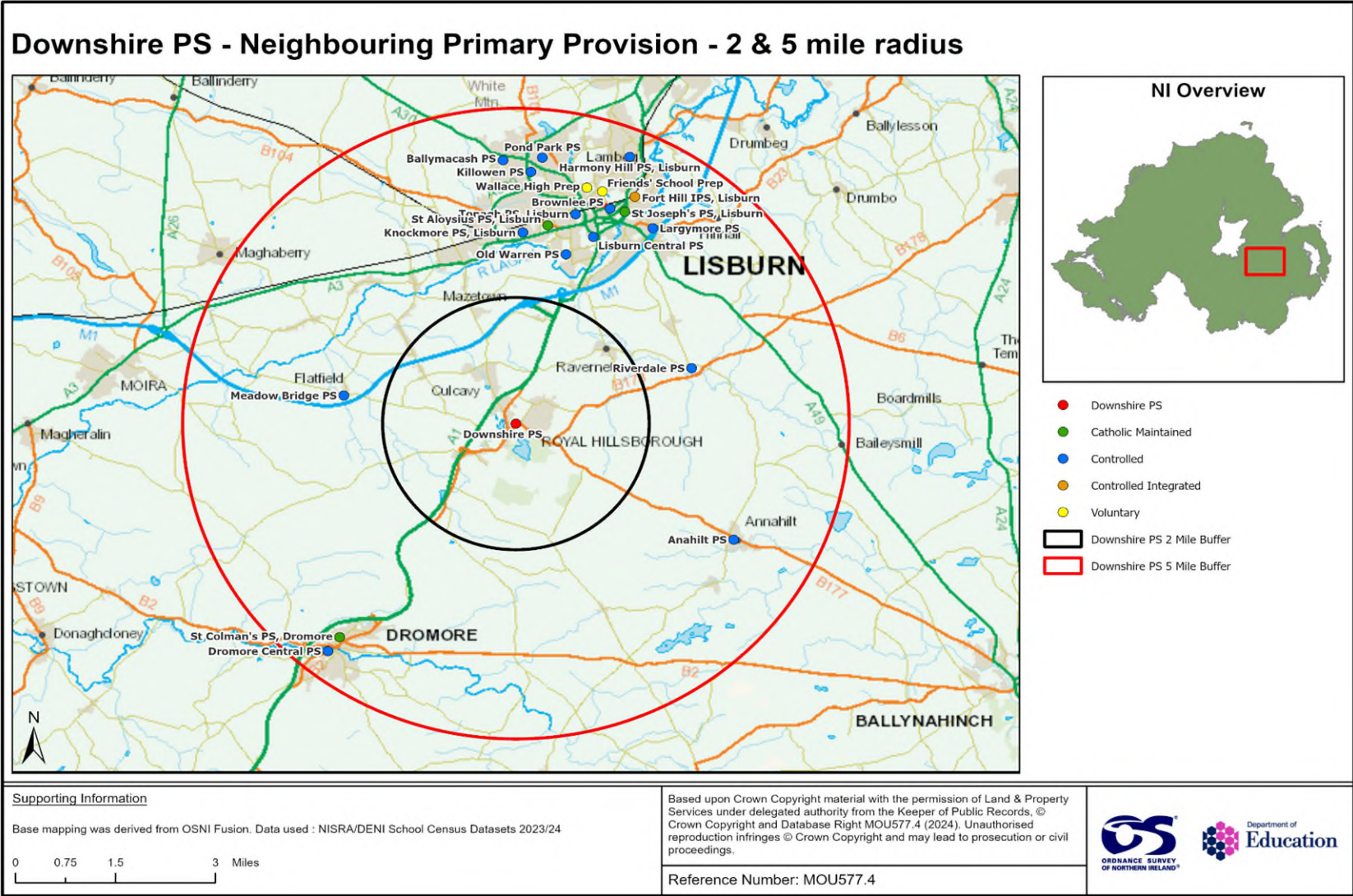
- i. consider the evidence set out in this submission and appendices to inform your decision on DP 735; and
- ii. agree that this submission (with appropriate redactions) will be published on the Department's website once the EA and the BoG of Downshire PS have been informed of your decision.



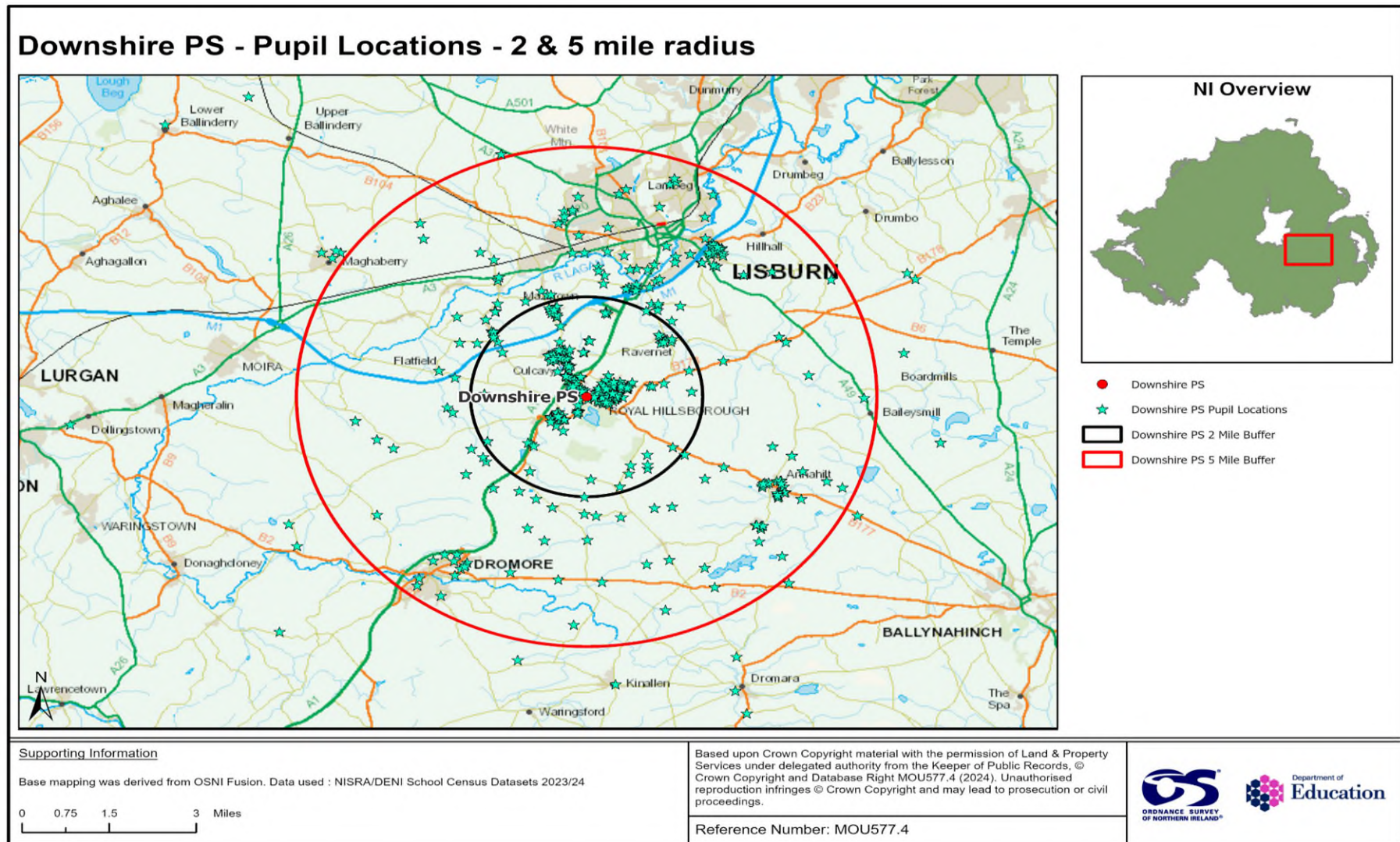
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Map 1

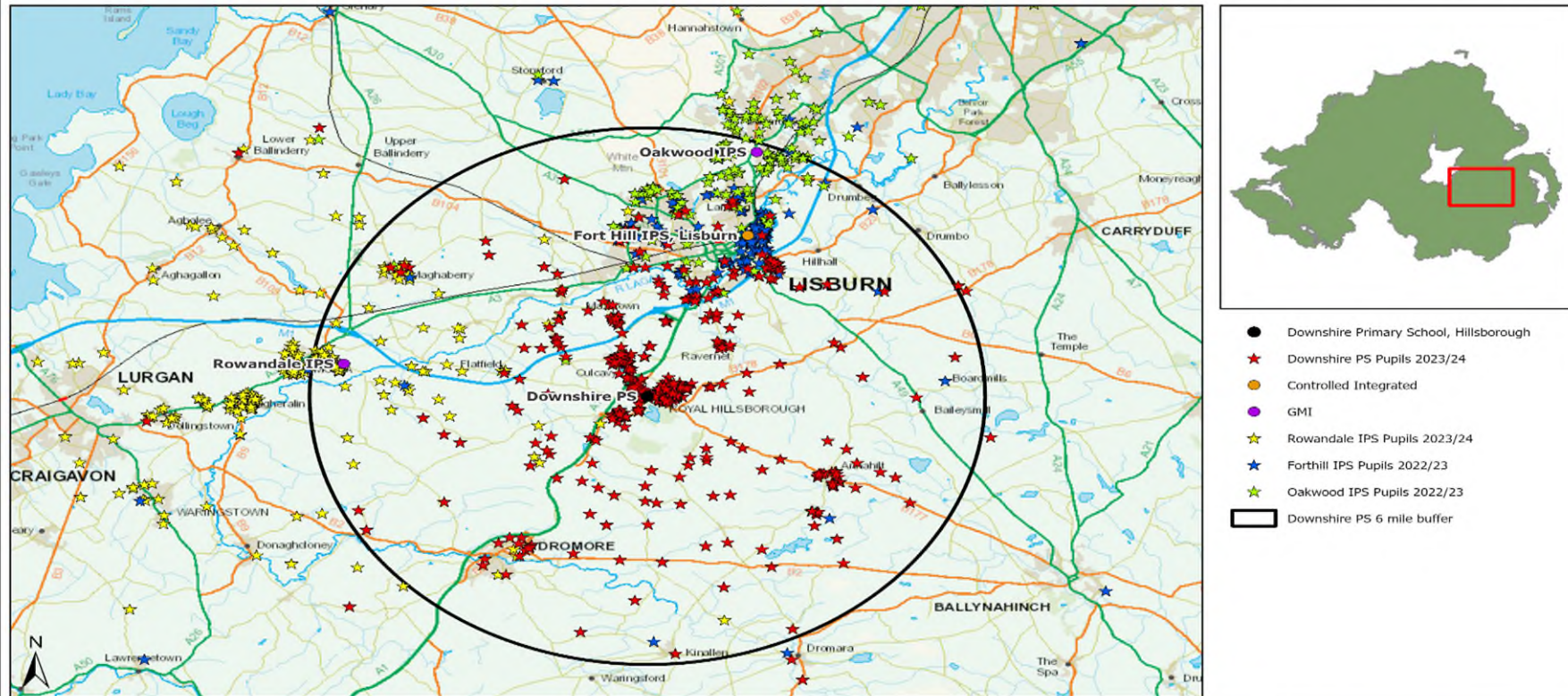


Map 2



Map 3

Downshire Primary School - Neighbouring Integrated Primary Provision & Pupil Locations - 6 Mile Radius



Supporting Information

Base mapping was derived from OSNI Fusion. School/pupil data source : NISRA/DENI School Census Datasets 2023/24
Due to ASOS Oakwood IPS and Fort Hill IPS pupil locations are based on 2022/23 Census data

0 1 2 4 Miles

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