

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	DP 736
School	Ballyhenry Primary School.
Proposal	Ballyhenry Primary School will transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter.
Minister's Decision	Not Approved
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. 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:
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	“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> 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?
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	<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 uncontentious 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 2025/26, the Year 1 intake was * % of the minority Catholic community exceeding the 10% principle. While the actual numbers are small, minor changes can have a significant impact on the overall percentage I am satisfied that the first limb of the test has been met. <u>Are there presently reasonable numbers in the school?</u> The percentage of Catholic pupils was 9.25% in 2025/26. 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; (a) the number of Catholics who live in areas from which the school draws its children,
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	(b) an acceptance that post-transformation, it would be expected that the number of Catholic children would increase, (c) an increase in the number of Catholic children between 24/25 and 25/26, (d) the transformation plan. However, set against that there is little evidence that the Catholic population will translate into enrolments of Catholic children at the school and they would have to attend the school in a proportion for which there is no historic evidence. 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. The fact that a transformation plan exists is not evidence that it will deliver reasonable numbers of Catholic children. The parental ballot is evidence of unmet demand with from a total of 219 eligible voters, there was a turnout of 56.6% (124), with 85.5% (106) voting in favour of Transformation with 14.5% (18) voting against. That represents 48.4% of all eligible voters. No Expressions of Interest (EOI) were received. I regard this omission as significant as EOIs have the potential to demonstrate actual demand from the minority community to attend the school. The parental ballot demonstrates support for transformation. It does not, however, demonstrate that the statutory requirement concerning reasonable numbers is likely to be met. Similarly, the lack of Expressions of Interest data provides no support for the proposition that future enrolment from the minority community is likely to increase to the extent required. Further, I note at para 100, officials conclude, “IE Team’s view is also that the CfC has not provided sufficient information and evidence to indicate that if transformation is approved the school is likely to ensure the provision of integrated education as defined by the 2022 Act.”
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	There is nothing in the section 3 bodies' responses that provides compelling evidence that the reasonable numbers test is likely to be met. Officials note that within a three-mile radius, there are already three Integrated primary schools (Glengormley IPS, Mallusk IPS, and Hazelwood IPS), meaning the area is comparatively well served by Integrated provision. However, these schools are experiencing different demand patterns. Mallusk IPS shows strong and growing demand, with enrolment increasing significantly over time and applications often at or above capacity. Hazelwood IPS has remained stable and sustainable, with consistently high enrolment close to its approved capacity. In contrast, Glengormley IPS has experienced a sustained decline in both admissions and overall enrolment, resulting in reductions to its approved admissions and enrolment numbers. There is also evidence that management type is only one factor amongst a range of factors in determining admissions behaviours. The admissions survey published by the Department in July 2025 makes interesting reading and may challenge some long-held assumptions. Of those who expressed a preference for an integrated school, only 12.9% cited, "I wanted integrated education" as the most important factor when selecting a school. Quality of education was the most important (32.5%) factor considered by parents when selecting an integrated school as first preference and also when selecting a non-Integrated school as first preference (39.6%). The notion, therefore, that because a child lives closer to Ballyhenry than any other integrated primary school would necessarily attend that school is speculation not informed by evidence. It is perfectly clear that there are many other issues at play. Indeed, for wishing to attend the closest integrated school to be a meaningful factor in any event such children would also have to be Catholic to have any impact on the reasonable numbers test. For the purpose of the reasonable numbers analysis, I conclude that this does not provide any evidence that would
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	assist on concluding it is likely that a reasonable number of Catholic children would attend the school. 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 has been an increase from 2024/25 to 2025/26 but this is insufficient 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. Further information was provided by Ballyhenry PS in a document dated July 2026. I have also taken the opportunity to consider this as part of the application. While the document indicates continued progress it does not affect my overall conclusion that the statutory requirement of 'reasonable numbers' will be met. I do however note that, notwithstanding formal integrated status not yet having been achieved, they continue to take actions to assist integration at the school. In particular they comment, <i>"We have not waited for a formal decision before continuing to develop the principles of Integrated Education within Ballyhenry. Our journey towards Integrated Status has influenced curriculum planning, assemblies, pupil leadership, policies, staff development, community engagement and the language we use across the school. We are becoming more intentional in how we reflect diversity, identity, culture, faith, belief, ability, rights and belonging in everyday school life.</i> <i>"Transformation would therefore formalise and strengthen a journey that is already underway. We are not arguing that Ballyhenry will become inclusive or integrated only if approval is granted. We are demonstrating that many of the principles of Integrated Education are already being lived in practice and that Controlled Integrated Status would provide</i>
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	<i>the structure, accountability and recognition needed to sustain and develop this work further.”</i> Taken collectively, the evidence does not establish that the achievement of reasonable numbers of Protestant and Roman Catholic pupils is likely. I note officials also conclude that the Department considers the Transformation of Ballyhenry PS could result in an increased surplus of Integrated primary places being made available which, potentially, could have a negative impact on the sustainability of other Integrated primary provision though this conclusion plays no part in my conclusion that the reasonable numbers test will not be met. I do not consider it likely that a significant number of Catholic children would attend Ballyhenry rather than existing provision in the area. 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: Elaine Armstrong
Area Planning Policy Team
(Cleared by Scott Harbinson – 03/07/2026)
(Cleared by Sharon Smyth – 03/07/2026)

Date: 3 July 2026

To: Paul Givan MLA
Minister of Education

Copy distribution below

**DEVELOPMENT PROPOSAL (DP) 736 – BALLYHENRY PRIMARY SCHOOL
TRANSFORMATION TO CONTROLLED INTEGRATED STATUS**

Issue: To decide on the following Development Proposal (DP) 736:

“Ballyhenry 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 resource or capital costs.
Transport - It is possible that Transformation may lead to an increase in the number of pupils requiring transport assistance, however it is anticipated that the cost would not be significant.

FOI Implications: The content of this report is likely to be fully disclosable.

Statutory Duty Implications: Article 64 of the Education Reform (Northern Ireland) Order 1989
Integrated Education Act (Northern Ireland) 2022
Article 44 of the Education and Libraries (Northern Ireland) Order 1986

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:**

The decision may prompt stakeholder and media interest. Should any queries arise, the Press Office can refer to this report and agree lines to take with officials (*cleared by Press Office*).

Recommendation:

It is recommended that:-

- I. You consider the evidence set out in this submission and appendices to inform your decision on DP 739; and
- II. If content, agree this submission (with any appropriate redactions) and the DP 736 decision can be published on the Department's website once the Board of Governors of Ballyhenry Primary School and the Education Authority have been informed of the decision.

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Introduction

1. Development Proposal (DP) 736 has been progressed under Article 92 of The Education Reform (Northern Ireland) Order 1989 (i.e. Proposals for acquisition of controlled integrated status). The proposal was published by the Education Authority (EA), on behalf of the Board of Governors (BoG) of Ballyhenry Primary School (PS), following a ballot held in accordance with Article 70 of the 1989 Order (as applied by Article 91). The two-month statutory objection period for the proposal ran from 12 September 2024 until 12 November 2024.
2. DP 736 was published by the EA on 12 September 2024 and proposes that:

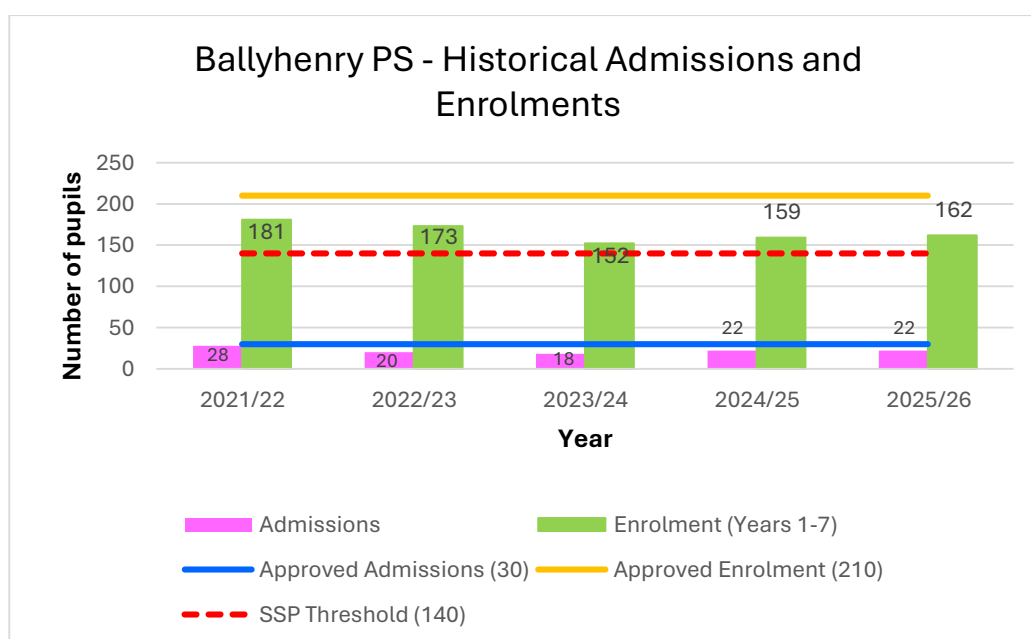
“Ballyhenry Primary School will transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter”.
3. A copy of the published DP and the BoG supporting Case for Change (CfC) are attached at **Appendices A** and **B** respectively.
4. The assessment of this DP has been impacted by the Judicial Reviews in relation to the court of Appeal judgment on DP 727 (JR 335 - Bangor Academy) and DP 728 (JR 336 - Rathmore Primary School).

Background – Ballyhenry Primary School

5. Ballyhenry PS is a Controlled, co-educational urban primary school located at 45 Ballyhenry Drive, Glengormley within the Antrim and Newtownabbey Local Government District (LGD). The approved admissions and enrolment for the school are 30 and 210 respectively. The school operates with two Specialist Provision classes which cater for pupils with Moderate Learning Difficulties (MLD). The location of Ballyhenry PS is shown in [Map 1](#).
6. On the Northern Ireland Multiple Deprivation Measure 2017 the Super Output Area (SOA), in which the school is located (Ballyhenry_1), is placed 705 out of 890 (1 being most deprived and 890 least deprived) and is classified as urban.
7. In 2025/26 the school had actual admissions and enrolment of 22 and 162 respectively, including 38 pupils with a Statement of Special Educational Need (SEN), 61 (37.7%) pupils with free school meal entitlement (FSME), and **86** available places.
8. [Chart 1](#) below illustrates the pattern of admissions and enrolments at Ballyhenry PS over the last five years. The school has admitted less than its approved admissions number (30) in each of the last five years, however, its actual enrolment is above the

Sustainable Schools Policy (SSP) minimum recommended enrolment of 140 for a sustainable urban primary school only when including pupils with a statement of SEN. First preference data at the conclusion of the admissions process for 2026/27 indicate that the school received 20 first preference applications for September 2026.

Chart 1: Historical Admissions & Enrolments at Ballyhenry PS



Source: DE Census Data
Source: DE Census
Figures include Supernumerary children

9. [Table 1](#) shows the statistics capturing the numbers of Protestant, Roman Catholic and other denominations enrolled in the school over the past five years.

Table 1 – Historical Religious Balance of Ballyhenry PS

Year	Catholic (%)	Protestant & Other Christian (%)	Non-Christian (%)	None (%)
2021/22	5.52	46.96	8.84	38.67
2022/23	5.03	49.16	8.94	36.87
2023/24*				
2024/25	5.66	50.94	3.77	39.62
2025/26	9.25	41.35	10.49	38.88

Source: School Census data - *Data not available due to ASOS

Integrated Education - Legislation and Case Law

10. The legislative process for proposals to transform 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 Department's assessment of Ballyhenry PS in the context of DP 736 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.
13. In terms of 'Proposals for acquisition of controlled integrated status' Article 92(6) of the 1989 Order states that *'[t]he 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.'*
14. Section 1(1) of the Integrated Education Act (Northern Ireland) 2022³ defines integrated education as: *'the education together, in an integrated school, of—*
 - *those of different cultures and religious beliefs and of none, including reasonable numbers of both Protestant and Roman Catholic children or young persons;*
 - *those who are experiencing socio-economic deprivation and those who are not; and*
 - *those of different abilities.'*
15. 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.

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

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

16. On 10 October 2023, the BoG passed a resolution to initiate a parental ballot which took place from 8 November 2023 to 28 November 2023 to transform Ballyhenry PS to Controlled Integrated Status with effect from 1 September 2025. With 219 eligible voters, there was a turnout of 56.6% (124), with 85.5% (106) voting in favour of Transformation with 14.5% (18) voting against. The result of the ballot is reproduced in the CfC at **Appendix B**.
17. The recent Court of Appeal judgement on the outcome of DP 727 (Bangor Academy) 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.
18. 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 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

19. 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.
20. The Department's Transforming Together - Understanding the Pathway to Integrated Education⁴ (updated and published on 25 February 2026) 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.
21. The Transforming Together 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 14](#) above.
22. The guidance states that; 'to 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.
23. Using the information provided in the CfC⁵, the updated Transformation Action Plan (**Appendix N**), Schools Development Plan (**Appendix O**), Reasonable numbers document (**Appendix P**), the assessment of DP 736 will be carried out against the

⁴ *It is noted that DP 736 was developed and progressed in advance of the publication of the revised guidance.*

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

areas listed in [paragraph 20](#). 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.

Planning and Engagement in the Transformation Process

24. The Department's Transforming Together guidance requires evidence of the school's commitment to Integrated education and its potential to become a sustainable Integrated school. 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.
25. The planning and engagement process for Ballyhenry PS's transformation demonstrates a deliberate, well-structured approach aligned with departmental guidance. The school began with informal exploration through its BoG, carefully considering demographic changes in the local community and seeking evidence of support before progressing. This reflects a clear focus on the interests of pupils and the need to ensure that transformation would be both meaningful and sustainable.
26. An engagement process followed, supported by a timeline (November 2022–October 2023) outlining the interaction with staff, parents, pupils, and key organisations including the Northern Ireland Council for Integrated Education (NICIE), the EA, and the Integrated Education Fund (IEF). The school used communication channels such as social media, print materials, and public advertising to raise awareness and encourage participation. Rather than formal Expressions of Interest (EOIs), the school opted for open consultation to prioritise dialogue and community inclusivity, which resulted in overwhelmingly positive feedback.
27. Post-ballot, the school continued to engage with support bodies, holding regular meetings with NICIE, EA, and the Transformation Action Group to refine its CfC and three-year Transformation Action Plan. External stakeholders, including NICIE and IEF, have recognised the strength of this engagement, highlighting the school's collaborative approach, strong leadership commitment, and ongoing participation in training and support programmes. Overall, the planning and engagement was deemed effective in relation to developing an intentional Integrated ethos.

Sustainability

28. An essential consideration for the Department is that the school will be viable and sustainable in the long term. All proposals are assessed against the criteria and indicators in the SSP.
29. The full sustainability assessment of Ballyhenry PS can be found at **Appendix R**. A summary of the assessment is detailed below.
30. The school's position against the six SSP criteria presents a mixed picture. While the last ETI inspection in 2017 judged the school as having a high capacity for sustained improvement, there is no current evidence to confirm the quality of education or leadership and management. Enrolment has declined in recent years and, although it remains above the minimum threshold when including SEN pupils, it falls below recommended levels when these are excluded and is well below the school's approved enrolment, reflecting wider demographic trends. The most significant concern relates to the school's financial position, with a substantial and worsening deficit projected to exceed £1.7 million. In contrast, the school is well-located and highly accessible to its community, with most pupils living nearby, and it maintains positive links with local organisations and is developing shared education partnerships. Overall, key concerns centre on financial sustainability and enrolment trends.
31. In regard to the provision of integrated education, 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

32. 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)'.

33. 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*'.
34. The [Integrated Education Demand Evidence Insights and Limitations](#) outlines that:
- 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.
35. 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.
36. Overall, the evidence presents a clear but primarily internal (school-based) demand for Integrated Education, with more limited insight into wider community demand.
37. The strongest indicator of demand is the parental ballot, where 85.5% of those voting supported transformation, demonstrating significant demand among current families. This is reinforced by the school's stated objective to reflect changing community demographics and by stakeholder interest in establishing a continuous Integrated pathway from primary to post-primary education. In its document on Reasonable Numbers (**Appendix P**), the school highlights patterns of transfer to Integrated College Glengormley, particularly the proportion of pupils choosing it each year.
39. 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.

40. In considering the evidential basis for likely future enrolment patterns, the Court attached significant weight to the presence or absence of concrete evidence, including 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.
41. The wider picture for Integrated education in the Ballyhenry area is more mixed and varied. The absence of EOIs from prospective parents means there is limited evidence of demand beyond the existing school community. Additionally, data from neighbouring Integrated primary schools shows that overall demand in the area is currently being met, with available places across schools and no consistent oversubscription. While Mallusk IPS and Hazelwood IPS show relatively stable demand, Glengormley IPS has experienced declining admissions and enrolment, indicating variation in local demand rather than clear pressure for additional places.
42. In summary, there is strong, demonstrable demand within Ballyhenry PS itself as evidenced by the parental ballot, yet places remain available at Integrated schools in the area. A full assessment of demand can be found at **Appendix R**

Alternative Primary Provision

43. To satisfy the duty under the Integrated Education (Northern Ireland) Act Section 5 (1)(a) and (b) (as outlined in [paragraph 32](#) above), it is important to look at alternative provision in the local area. Key statistical data including alternative primary provision is provided in **Appendix Q**.
44. [Map 1](#) provides a snapshot of Neighbouring Provision within a two-mile radius. [Map 2](#) details the alternative Integrated provision within a three-mile mapping radius. Distances by road may vary from the mapping distance. Full details of neighbouring provisions within 2 and 3 miles are also provided in **Appendix Q Table 1**.
45. The mapping shows significant neighbouring primary provision within a two to three-mile radius of Ballyhenry PS across all sectors. The three nearby Integrated schools are all within a short travel distance (Glengormley IPS (1.1 miles), Mallusk IPS (1.9 miles) and Hazelwood IPS (3.3 miles)) and, while viable, are currently undersubscribed, with notable surplus capacity, despite the reduction in places at Glengormley IPS effective from 1 September 2025.

46. [Map 3](#) shows the neighbouring Integrated Primary Provision within 30 mins drive-time from Ballyhenry PS.
47. In 2022/23, as part of a resetting exercise⁶ carried out by the Department, Glengormley IPS had its approved enrolment reduced (mandatory change) from 446 to 420 with no change to its admission number (60). This request was approved under the 1997 Order, which negated the requirement for a DP. On 24 June 2024, the Principal of Glengormley IPS requested a further reduction in its approved admissions and enrolment numbers from 60 and 420 respectively to 43 and 300 respectively from the 2025/26 academic year to enable the school to remain eligible for the School Enhancement Programme (SEP), as the school's actual enrolment was below 85% of approved enrolment – a gateway check for SEP.
48. The Department's School Admissions Team has advised that the Department consulted on the proposal (to reduce the admissions and enrolment at Glengormley IPS, in order to access SEP) and received responses from the EA, Northern Ireland Council for Integrated Education (NICIE), and the Controlled Schools Support Council (CSSC) with each Body supporting the school's request. In its response, NICIE stated: *"Taking this decision now could support greater sustainability of Integrated provision in the Glengormley area and would acknowledge the challenges faced by the school in relation to SEP funding"*.
49. In light of the supportive comments made by consultees; being mindful of the Department's statutory duty in respect of Integrated Education; and in light of the fact that the removal of these places appeared to be notional, the request was approved with the caveat that the decision would be reviewed in three years' time to ascertain if it remains appropriate. If DP 736 is approved, effectively increasing the number of Integrated primary school places available in the area, School Admissions Team has confirmed that the Department will take these places into consideration at the time Glengormley IPS's numbers are reviewed and if there are sufficient Integrated primary places in the wider area at that time, Glengormley IPS may be retained at the current (lower) approved numbers, i.e. admissions and enrolment of 43 and 300 respectively.

⁶ The Resetting for Area Planning (downsizing) process for primary schools was the first in a series of initiatives introduced by DE to support the delivery of the Sustainable Schools Policy (SSP) through more efficient and effective Area Planning. The Resetting process was informed by the Resetting School Admissions and Enrolment Numbers Pilot exercise (2019). The guidance for the primary school resetting process can be viewed on the Department's website at: <https://www.education-ni.gov.uk/sites/default/files/publications/education/Resetting%20for%20Area%20Planning%20process%20-%20Guidance%20-%20November%202020.pdf>

50. Similarly, the Controlled sector demonstrates substantial excess capacity, with most schools above sustainability thresholds but largely undersubscribed. Catholic Maintained schools in the area also have available places despite strong enrolments, and the local Irish-medium school has some capacity.
51. Overall, there is a clear oversupply of places in the area with sufficient alternative provision available. ETI inspection evidence indicates that the quality of provision across neighbouring schools is good to very good.
52. Incorporating all the schools within the three-mile radius (including Ballyhenry PS) in 2025/26 there was a total of 4,671 approved enrolment places, with an actual enrolment of 3,897 (including supernumerary places) and 508 admissions for the 661 approved places to Year 1. This resulted in 1079 available places in the area, with the majority of these places available across the Controlled sector (738). The Department notes this area is well served with primary schools and within a three-mile radius there are 14 primary schools (including Ballyhenry PS), however, there are a significant number of available places within the area (notably 135 in the Integrated sector).
53. The [Integrated Education Demand Evidence Insights and Limitations](#) published in May 2026, shows the over and under subscription at first preference for Integrated primary schools at Year 1 by council of school location since 2020/21.
54. [Table 2](#) below shows the subscription details for Integrated primary schools in the wider Antrim and Newtownabbey council area and shows consistent undersubscription for integrated primary schools in this wider area with 2025/26 at -38.9%.

Table 2: Over/under subscription at first preference for Integrated primary schools at Year 1 for Antrim & Newtownabbey since 2020/21.

	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Approved Year 1 Admission Numbers	231	231	216	216	216	203
1st Preference Applications (% over/under subscription)	142 (-38.5%)	152 (-34.2%)	120 (-44.4%)	128 (-40.7)	152 (-29.6%)	124 (-38.9%)

Area Planning Context

55. 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.
56. 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.
57. This DP for the proposed Transformation of Ballyhenry PS was not included in OP1 however, following its publication additional work streams were subsequently identified and published in an addendum which provided a list of additional Short Term Work Streams as at 1 February 2024, including the following action, with the key theme of *"Increase parity of access for all to appropriate pathways."*

Ballyhenry PS - Short Term Work Stream - Addendum to OP1

Ballyhenry PS 45 Ballyhenry Avenue Glengormley BT36 5AZ	Background / Engagement	
	Ballyhenry PS is proposing to transform to controlled integrated status.	
	Statutory Duty / Ministerial Priority	Key Theme(s)
	Statutory Duty - Integrated Education	Increase parity of access for all to appropriate pathways

58. Operational Plan 2 (OP2) 2024-2026 was published on 16 January 2025. It is noted that Ballyhenry PS was not included in OP2. OP2 includes population projections provided by the Northern Ireland Statistics and Research Agency (NISRA). For Antrim and Newtownabbey LGD, in which the school is located, it shows a declining birth trend ([Chart 2](#)). While [Chart 2](#) shows the peaks and troughs, since 2011/12, the numbers have fallen from 1889 births in that year to 1555 in 2021/22. 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 in the LGD for Years 1-7 from 12,800 (2024) to 11,216 (2035) representing a 12.37 % decline.
59. The Department published its latest School Population Projections (2023/24)⁷ on 27 June 2025. The projections estimate pupil numbers across various school phases in Northern Ireland until 2033/34. They are primarily informed by birth and population forecasts produced by NISRA. In considering primary and preparatory schools (Year 1 – Year 7) the school population is projected to decline by 20.4%. Between 2023 and 2033, the population of children aged three to 17 is expected to decrease by 12.2%,

according to 2022 based NISRA population projections. When broken down by age group, the data show a 16.2% decline among three-year-olds, an 18.0% decline among those aged four to 10, and a 10.1% decline among those aged 11 to 15.

Chart 2: Birth Data: Antrim and Newtownabbey Births

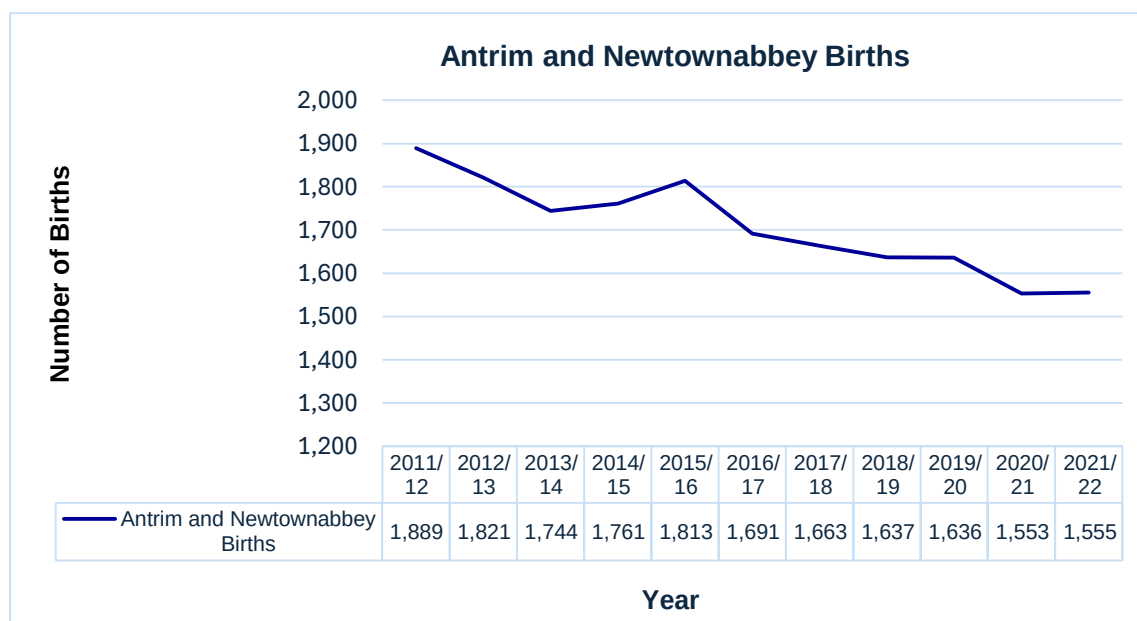
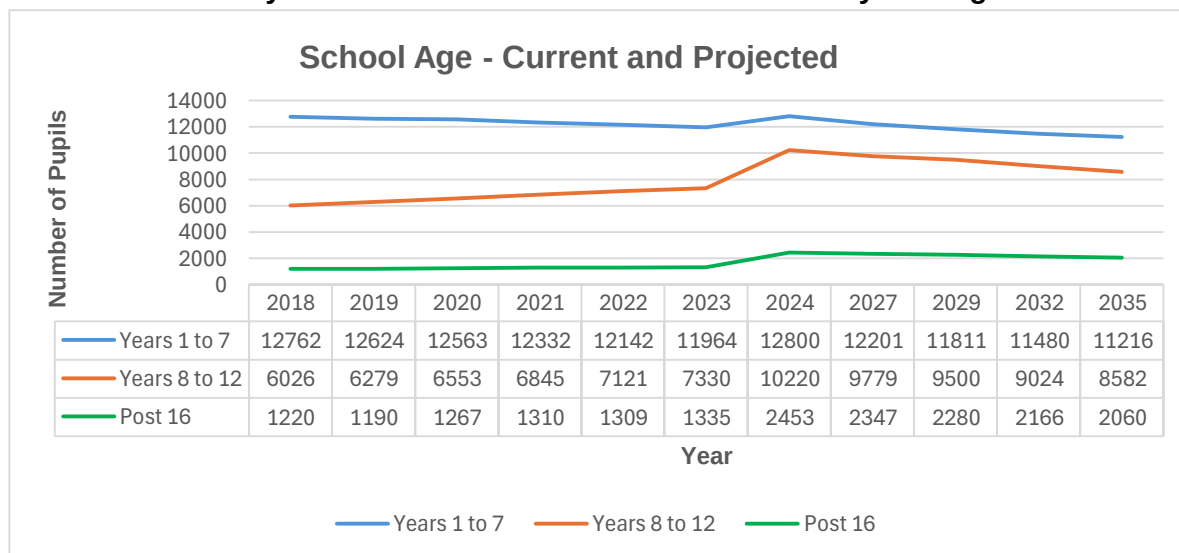


Chart 3: Historic, Current and Projected School Age Pupils in Attendance at Primary and Post Primary Schools in the Antrim and Newtownabbey Borough Council Area



Source: DE Census Data/ NISRA

60. [Chart 4](#) taken from OP1 and [Table 3](#) taken from OP2, detail projected births and anticipated Year 1 places required. It shows that the number of births is in decline and therefore the number of Year 1 places required is also expected to decrease.

Chart 4: Year 1 Places Required

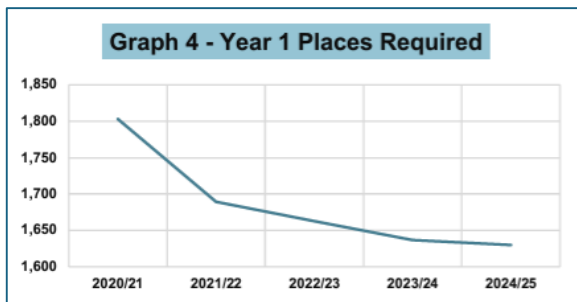


Table 3: Projected Births by Academic Year

Academic Birth Year	Antrim and Newtownabbey LGD Births	Variance From Previous Year	Year 1
2018/19	1,637	-26	2023/24
2019/20	1,636	-1	2024/25
2020/21	1,553	-83	2025/26
2021/22	1,555	2	2026/27

61. DP 736 does not propose any change to approved admissions or enrolment at the school, however, should this DP be approved, this would mean the conversion of 210 Controlled places in the area to 210 Controlled Integrated places. There are 652 Controlled places in the area (not including Ballyhenry), and whilst the conversion of 210 places into Controlled Integrated places may help stabilise the Controlled sector, approval of the DP would introduce additional Integrated places in close proximity to the three existing Integrated primary schools, potentially undermining and risking the sustainability and religious balance of those schools.
62. NICIE asserts that evidence indicates that the transformation would have minimal impact on nearby Integrated primary schools. According to NICIE Ballyhenry PS differs in size and local catchment characteristics, with a clear identity as a small, sustainable school. It states that geographic factors and demographic trends particularly growth in the local Catholic population support its capacity to attract a more balanced intake without undermining neighbouring schools. Additionally, NICIE asserts the proposal contributes to strengthening a local Integrated pathway from primary to post-primary education, particularly following the recent transformation of Integrated College Glengormley.
63. [Map 2](#) shows that within a three-mile radius, there are already three Integrated primary schools (Glengormley IPS, Mallusk IPS, and Hazelwood IPS), meaning the area is comparatively well served by Integrated provision. However, these schools are experiencing different demand patterns. Mallusk IPS shows strong and growing demand, with enrolment increasing significantly over time and applications often at or above capacity. Hazelwood IPS has remained stable and sustainable, with consistently high enrolment close to its approved capacity. In contrast, Glengormley IPS has experienced a sustained decline in both admissions and overall enrolment, resulting in reductions to its approved admissions and enrolment numbers.
64. Admissions data across the area shows fluctuating but overall stable demand, rather than a consistent upward trend. Importantly, there have been available places across all three schools in recent years. This indicates that, at an area level, demand for

Integrated primary places is largely being met, with capacity still available in the system.

65. At the same time, there are local factors supporting Ballyhenry's case within this context. Demographic change in the area particularly an increase in the Catholic population and a rise in pupils identifying as "Other" suggests a community becoming more diverse. In addition, the proximity of IC Glengormley (just 0.3 miles away) and the pattern of pupils transferring there highlight an existing local Integrated pathway, which stakeholders have expressed a desire to strengthen.
66. This places Ballyhenry PS' proposal within a context where the case is less about filling a shortage of places and more about increasing choice and responding to demographic change.
67. A full assessment of the area context can be found in **Appendix R**.

Provision of Integrated Education

68. Ballyhenry PS enrolls pupils from different cultural and religious backgrounds, the school operates within an increasingly diverse local area, where census data show the Catholic population has risen from 42% to 46% and those identifying as "other" or "none" have increased to 10%. While the current school profile includes approximately 41% Protestant pupils, around 5–9% Catholic pupils and a significant proportion (around 49–54%) from other or no religious backgrounds, the Transformation Plan sets actions to address this imbalance by working towards greater religious equality within the school community. The school's ability to attract children from diverse backgrounds is already evidenced by the presence of newcomer pupils, who made up approximately 6.8% of enrolment in 2025/26.
69. Based on the Year 1 enrolment data for Ballyhenry PS in 2025/26, the school shows the capacity to meet the Department's General Principle for Transformation in the year after transformation, given it has met the requirement in the most recent year available. In considering the 10% principle, 2025/26 figures indicate that 13.6% were from the minority religion and in considering the 15% principle the figure was 23.7%, both exceeding the required threshold.
70. [Map 4](#) shows the wards in which Ballyhenry PS pupils reside and demonstrates the school's provision for pupils from different socio-economic backgrounds. This aligns with the Act's requirement to educate together those experiencing deprivation and those who are not.

71. Free School Meal Entitlement in the school has consistently been above the Northern Ireland average (27.7%). This reflects a socially mixed intake and highlights the school's role in supporting disadvantage. Ballyhenry PS is part of the Extended Schools Programme, enabling it to provide targeted supports such as afterschool provision, wellbeing initiatives, and family engagement opportunities, which reduce barriers to participation. These interventions ensure that pupils from all socio-economic backgrounds are not only present in the school but are fully included in its educational and wider experiences.
72. In terms of provision for pupils of different abilities, the number of pupils with SEN has grown significantly, with pupils with a statement of SEN increasing from 12 to 38, alongside a further cohort supported at earlier stages of the SEN register. The school has responded proactively through whole-staff training, nurture-based approaches, and inclusive classroom practice. Crucially, it has established specialist provision classes, with one class opened in August 2023 and a second in September 2024, both supporting pupils with Moderate Learning Difficulties within a mainstream setting. This ensures that pupils with additional needs are educated alongside their peers wherever appropriate, while still receiving targeted support.
73. More details on the assessment against the transformation areas can be found at **Appendix R**. Comments from other policy areas in the Department of Education can be found at **Appendix C**.

Consultation Process

74. 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.'
75. 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'.
76. The Department has identified NICIE, the IEF and the Controlled Schools Support Council (CSSC) as relevant bodies for the purposes of such consultation.
77. On 2 October 2024 the Department wrote to each of these bodies, seeking their views on DP 736. A copy of that letter issued to NICIE can be found at **Appendix L**, which is the same for all S3 bodies.

78. Each response from NICIE, IEF and CSSC was submitted in one submission covering both the Statutory Objection Period and Section 3 comments and have been summarised below. A copy of each response is reproduced in full at **Appendices E, F and G** respectively.

79. CSSC responded as follows

- CSSC recognises that Ballyhenry Primary School already provides a welcoming and inclusive environment for children from a range of socio-economic backgrounds, with differing abilities, and from all faith traditions and none. The Committee notes the positive outcome of the parental ballot and the school's desire to provide further reassurance to parents of its commitment to inclusivity and diversity through formal recognition as an integrated school. CSSC also acknowledges that a significant number of Ballyhenry PS pupils transfer to Integrated College Glengormley (ICG) and that transformation to Controlled Integrated status would support pupils in meeting ICG admissions criteria while securing an integrated educational pathway from primary to post-primary education.
- In considering the proposal, CSSC highlights that, in line with Section 5 of the Integrated Education Act, efforts to meet demand for integrated education must be viewed within the wider context of area planning and the overall sustainability of the school estate. While recognising that the creation of an integrated pathway may raise concerns for other controlled schools in the area, CSSC supports Ballyhenry PS in seeking transformation to Controlled Integrated status and notes the Education Authority's commitment to actively monitor the area for any potential impact the proposed transformation may have on neighbouring schools.

80. NICIE comments are as follows:

- The proposal to transform Ballyhenry Primary School to Integrated status is strongly supported, underpinned by clear parental demand, 85.5% of voting parents favour the change. The school has demonstrated robust planning, with a well-developed Transformation Plan and a commitment to adopting the NICIE Statement of Principles, ensuring alignment with the legal definition and ethos of Integrated Education. It meets sustainability criteria with 159 pupils enrolled, and the proposal has been carefully developed through consultation with parents, staff, and the wider community in line with departmental guidance. Approval would also support the Department in meeting its statutory duties to expand Integrated Education provision.
- Evidence indicates that the transformation would have minimal impact on nearby Integrated primary schools. Ballyhenry PS differs in size and local catchment characteristics, with a clear identity as a small, sustainable school. Geographic factors and demographic trends particularly growth in the local Catholic population

support its capacity to attract a more balanced intake without undermining neighbouring schools. Additionally, the proposal contributes to strengthening a local Integrated pathway from primary to post-primary education, particularly following the recent transformation of Integrated College Glengormley.

- The school is well positioned to deliver Integrated Education effectively. It has a strong track record of engagement with NICIE, IEF, and EA support programmes, alongside staff development focused on ethos, anti-bias practice, and inclusive Religious Education. While recognising the need to enhance religious diversity, the school has identified this as a priority and outlined targeted actions to address it. Its commitment to inclusion, celebration of diverse identities, and support for pupils of varying socio-economic backgrounds and abilities places it in a strong position to successfully implement and sustain Integrated Education.

81. IEF has provided a commentary as follows:

- The proposal to transform Ballyhenry PS to Integrated status is strongly welcomed, particularly as it reflects clear parental support, with approximately 85% voting in favour. There has been significant engagement with stakeholders throughout the process, and the school's leadership has demonstrated a clear commitment to ensuring that exploration of transformation was carried out collaboratively and with consensus. The school has also actively sought guidance and support from the IEF and NICIE during this stage.
- The proposal aligns with the Department's statutory duty under the Integrated Education Act 2022 to encourage, facilitate, and support the development of Integrated Education. Approval would increase the number of Integrated places in the Glengormley area and help both the Department and the Education Authority fulfil these responsibilities. Evidence presented indicates that Ballyhenry PS can successfully operate as an Integrated school with minimal impact on other local schools.
- Looking ahead, there is a commitment to continue supporting Ballyhenry PS as it progresses through the transformation process. The IEF has indicated it will remain open to providing grant support where possible, while also emphasising the importance of adequate financial resources from the Department to ensure the successful delivery of transformation.

Pre-publication consultation

82. The CfC asserts that, as the proposer, the BoG undertook the required consultations with governors, staff, and parents/guardians.
83. In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent to schools and pre-schools which, in the opinion

of the EA, might be affected by the proposal. A total of 79 local schools and pre-schools which might be impacted by the proposal were forwarded correspondence during the pre-consultation period and invited to submit their responses to the EA by 27 June 2024.

84. Two responses were received from affected schools, and one response was received from the CSSC during the pre-consultation period. Details of the pre-consultation are included in the CfC at **Appendix B**.
85. A summary of the comments are set out below:

In support of the Proposal

- CSSC recognises that Ballyhenry PS already welcomes children from different socio-economic backgrounds, children with different abilities and children from all faiths and none, consistent with the definition of Integrated Education (Integrated Education Act (Northern Ireland) 2022; and
- CSSC also notes that a significant number of pupils transition from Ballyhenry PS to the Integrated College Glengormley – in becoming an integrated primary school Ballyhenry PS would provide an integrated pathway for their pupils.

Not in support of the Proposal

- Fully behind the considered and careful transformation of any school across to Integrated status if the demand for places outstrips supply within reasonable distance;
- Note the falling demographic of primary school aged children and the number of available places currently in the integrated sector;
- Consider that approval of this proposal would impact negatively on the enrolments of Glengormley IPS;
- Moss Grove PS and NU as a controlled school is '*Open to All*' and is already an '*organically integrated school*' with the availability to meet the demand in the local area for integrated and inclusive education. Concerned that approval would impact negatively on the future diversity of Moss Grove PS;
- The majority of children attending controlled schools are 'no religion/ other Christian';
- There remains more than adequate places for all sectoral parental preferences;
- There are more integrated places than are required in or around Glengormley at this time;
- Approval of the proposal will have a negative impact on area planning in the Glengormley area; and

- Considers that transformation to integrated status should be managed in a strategic and planned way, not granted to those that are first to ballot parents.

86. The Department's guidance on DPs 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).

EA Comments

87. The EA supports the proposal for Ballyhenry PS to transform from Controlled to Controlled Integrated status acknowledging its statutory duty to encourage, facilitate and support integrated education. The EA comments are as follows:

- Ballyhenry 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;
- There are available places at integrated primary schools in the area and the EA will actively monitor the area on any potential impact the proposed transformation may have on local schools.

Two-month Statutory Objection Period

88. The two-month statutory objection period on the proposal ran from 12 September 2024 until 12 November 2024. During the statutory objection period the Department received one letter of objection from the BoG of Moss Grove PS and Nursery Unit (NU), a copy of which is available at **Appendix H**. There were responses in support of the proposal from the CSSC, NICIE and the IEF. The Department notes that there was some support offered to the school from Community Relations in Schools (CRIS), and Alderman Julian McGrath (Antrim and Newtownabbey Borough Council) which are included in the CfC, however this support has not transpired through the Statutory Objection Period.

89. The main themes of the letter of objection from the BoG of Moss Grove PS and NU are set out below:

- Moss Grove PS and NU is "Open to All" and as a result is an "organically integrated" school which is inclusive in nature and serves the diversity of its school community;

- Concerned that Moss Grove PS and NU will be perceived as not being inclusive and its already diverse school demography will be negatively impacted as parents may choose an “Integrated label” which will impact its enrolment;
- There are two existing Integrated Primary Schools in the Glengormley/ Mallusk catchment area;
- Concerns around the impact of Local Area Planning and how another local school transforming may have a negative impact on the perception of the Controlled Sector, particularly in the Glengormley area where a range of communities and families have traditionally chosen controlled school education as an “open to all” option;
- Assert that the “demand” for Integrated Schools in the Glengormley central is driven not by the specific desire for Integrated Education but by parental choice to send their child to the most “local school”;
- Assert that Ballyhenry’s parental ballot was in response to the transformation of its nearest Post Primary School and its entry requirements that prioritises applications from Integrated Primary Schools;
- Argues that transformation to Integrated Status should not be ad hoc but more strategic and planned.

Statutory and Other Considerations

- Article 64 - Statutory Duty to Encourage, Facilitate and Support the Development of Integrated Education
- Integrated Education Act (Northern Ireland) 2022
- Article 44 of the Education and Libraries (Northern Ireland) Order 1986 (effective and efficient use of public funds)
- Court of Appeal – Judgement on previous transformation proposals (JR335 and JR336)
- Housing Developments and Enhancement of Road Network
- Educational Impact
- VISION 2030 – A Strategy for Integrated Education 2025-2030
- Resource Implications

90. A full assessment of Statutory and Other considerations can be found at **Appendix S**.

Conclusion

91. Article 64(1) of The Education Reform (Northern Ireland) Order 1989 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.’

92. Article 92 (6) of The Education Reform (Northern Ireland) Order 1989 places a statutory duty on the Department to 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.
93. Section 1(1) of the Integrated Education Act (Northern Ireland) 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.*
94. The support for the proposed Transformation is evidenced by the parental ballot. The area in which the school is situated is already well served by existing Integrated primary provision, which remains undersubscribed, and demographic trends point to a continuing decline in the school-age population. There are concerns over the school’s sustainability with it not meeting the minimum SSP threshold when pupils with a statement of SEN are excluded and in relation to its significant and worsening financial deficit, projected to exceed £1.7 million by 2027. There is no recent inspection evidence to confirm the quality of education or leadership.
95. Whilst the school appears to have strong links with its local community and there is evidence that it widely shared its proposal for transformation, it did not take the opportunity to seek EOI forms from its community to support this proposal, resulting in a lack of evidence of support from the wider community and therefore a shortage of evidence to illustrate its capacity to achieve the required reasonable numbers from the minority religion.
96. The BoG of Ballyhenry PS and the school have demonstrated throughout the CfC the efforts taken to explore Transformation and have developed a comprehensive three-year TAP setting out how the school will intentionally develop and implement new policies and practices to reflect the culture and ethos of Integration.
97. The school already educates children from diverse cultural, socio-economic backgrounds and abilities. Based on the Year 1 enrolment data for Ballyhenry PS in 2025/26, the school seems likely to meet part of the Department’s General Principle for Transformation as referenced in the Written Ministerial Statement on reasonable

numbers: *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 15% of the combined number of Protestant and Catholic year 1 or year 8 pupils, in the first year of Transformation.* This is on the basis that in respect of the 10% principle in 2025/26, the school's figure was 13.63%, and for the 15% principle the figure was 27.7%, both exceeding the required thresholds. The General Principle, however, also requires that evidence shows that this is likely 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. While the demographic breakdown of the area suggests there is potential for the school to attract more pupils from a Catholic background and actions outlined in the TAP include reaching out to the wider community and fostering links with organisations and schools across different traditions, it is not demonstrated how the transformation would lead to a growth in Catholic pupils given the protected decline in the school population and capacity for Integrated Education in the immediate area.

98. Should demand for Integrated primary school places in the area increase as a result of parental preference, the Department has the option to grant TVs or reintroduce places at Glengormley IPS.
99. The Department's Integrated Education (IE) Team's view, based on the school's submitted CfC, is that the proposal is broadly aligned in principle with the Integrated Education Act, it demonstrates a clear intention to transform to integrated status and to adopt the associated ethos. It provides evidence of current diversity within the school and sets out actions to further increase diversity across religious, socio-economic and ability dimensions.
100. The IE team considers that the school's religious balance across all year groups currently sits below 10% and while the school serves a locality with a more mixed religious profile, its Catholic enrolment requires significant growth to fully meet the Department's General Principle for transformation. The CfC relies heavily on the argument that the school draws from a more balanced catchment and that transformation will encourage greater Catholic participation. Achievement of a 10% Catholic threshold in the first year of transformation is possible, but a significant change in parental preference and admission patterns following transformation rather than on existing enrolment trends would be needed to meet the General Principle in full. The absence of quantified projections or targets for achieving a reasonable mix and evidence (such as through provision of EOIs) that applications from the minority religion will increase, means that the proposal does not yet provide sufficient evidence to demonstrate how it will meet the full definition of integrated education under Section 1 of the Act. IE Team's view is also that the CfC has not provided sufficient information and evidence to indicate that if transformation is approved the school is likely to ensure the provision of integrated education as defined by the 2022 Act.

101. In assessing the evidence, the Department considers the Transformation of Ballyhenry PS could result in an increased surplus of Integrated primary places being made available which, potentially, could have a negative impact on the sustainability of other Integrated primary provision. The CfC also does not demonstrate how the reasonable numbers of the minority religion will be attained, as outlined in [paragraph 22 \(ii\)](#).

Recommendation

102. It is recommended that:

- I. You consider the evidence set out in this submission to inform your decision on DP 736; and
- II. If content, agree this submission (with any appropriate redactions) and the DP 736 decision can be published on the Department's website once the Board of Governors of Ballyhenry Primary School and the Education Authority have been informed of the decision.



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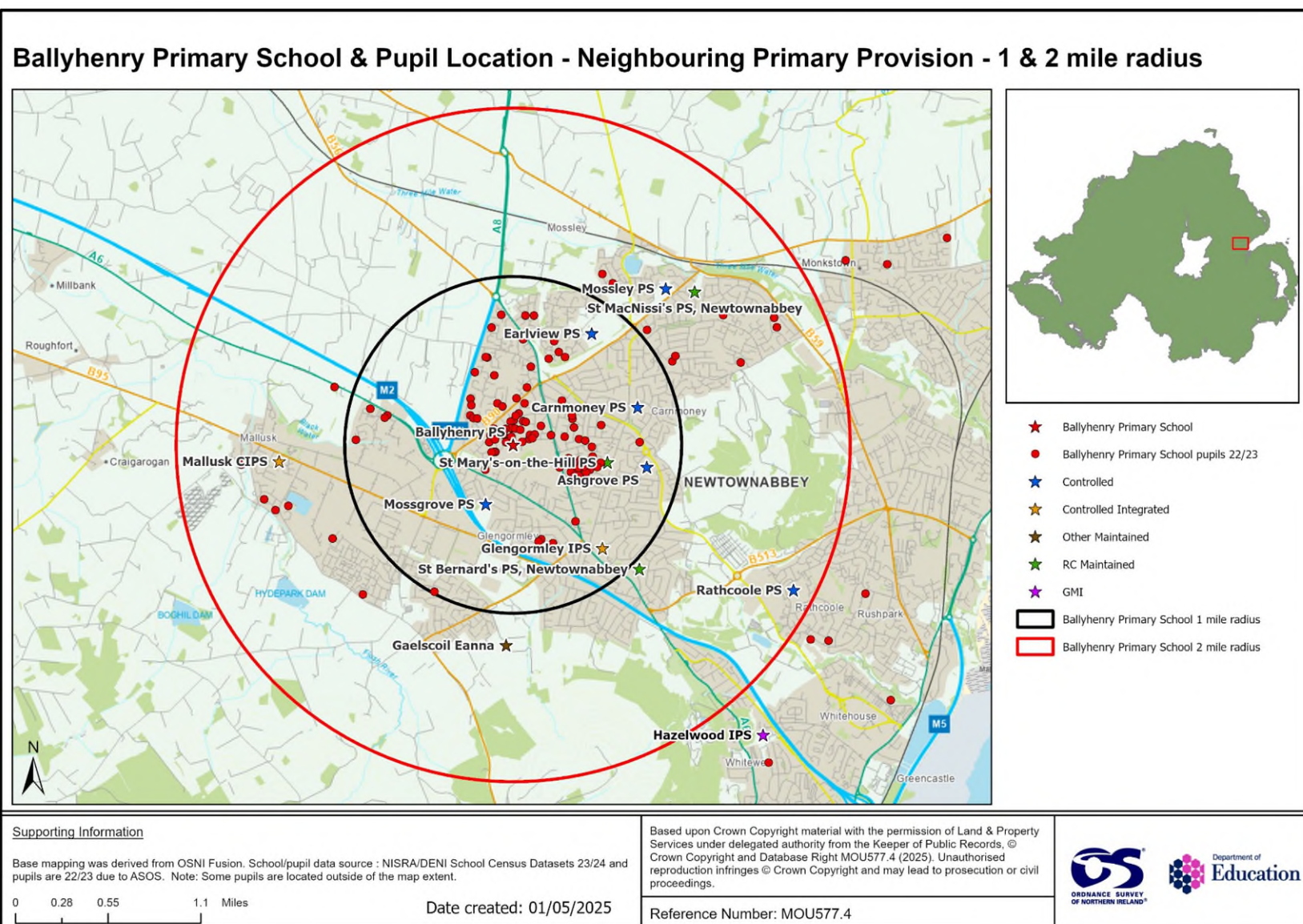
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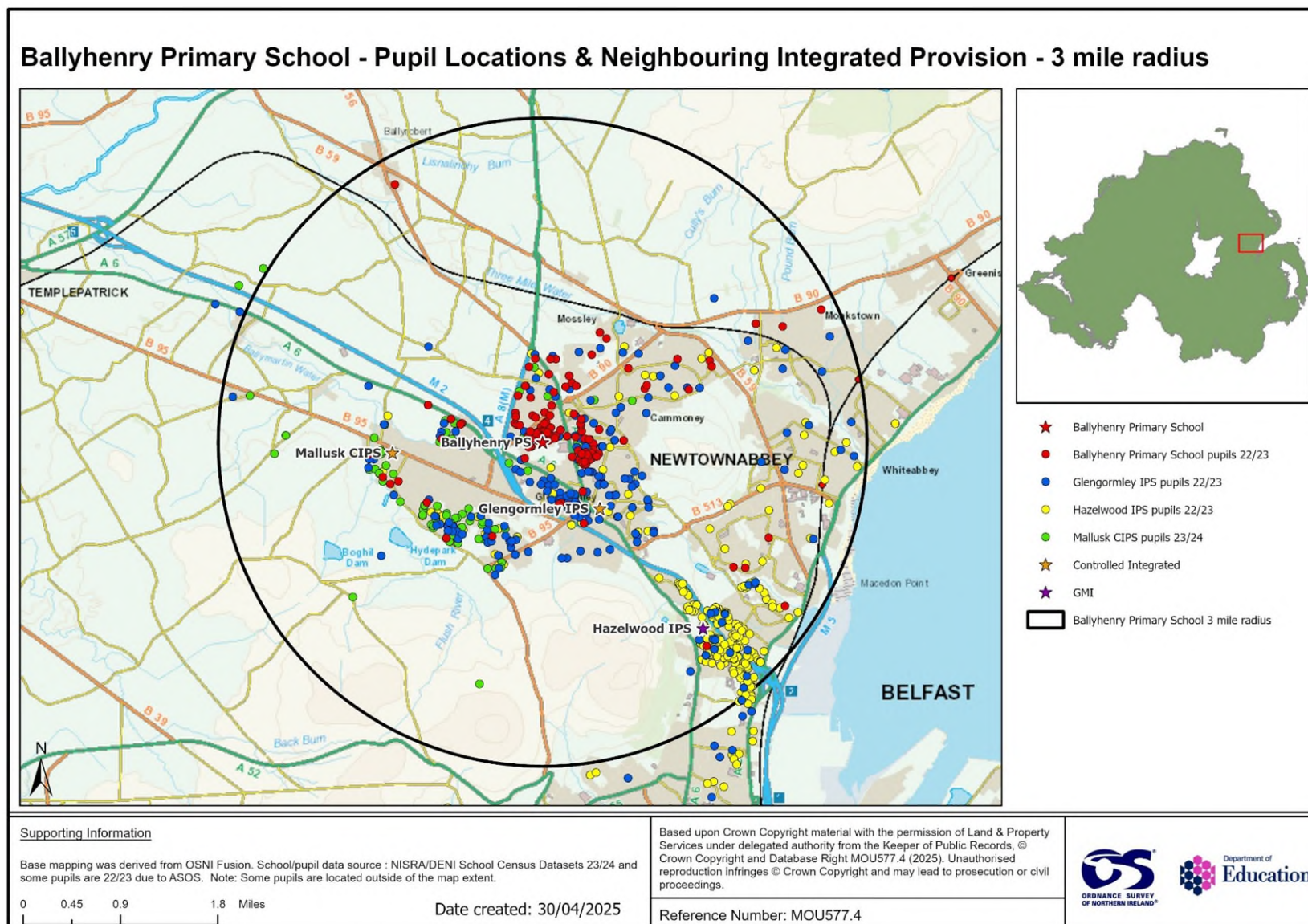
APPT Correspondence

Press Office

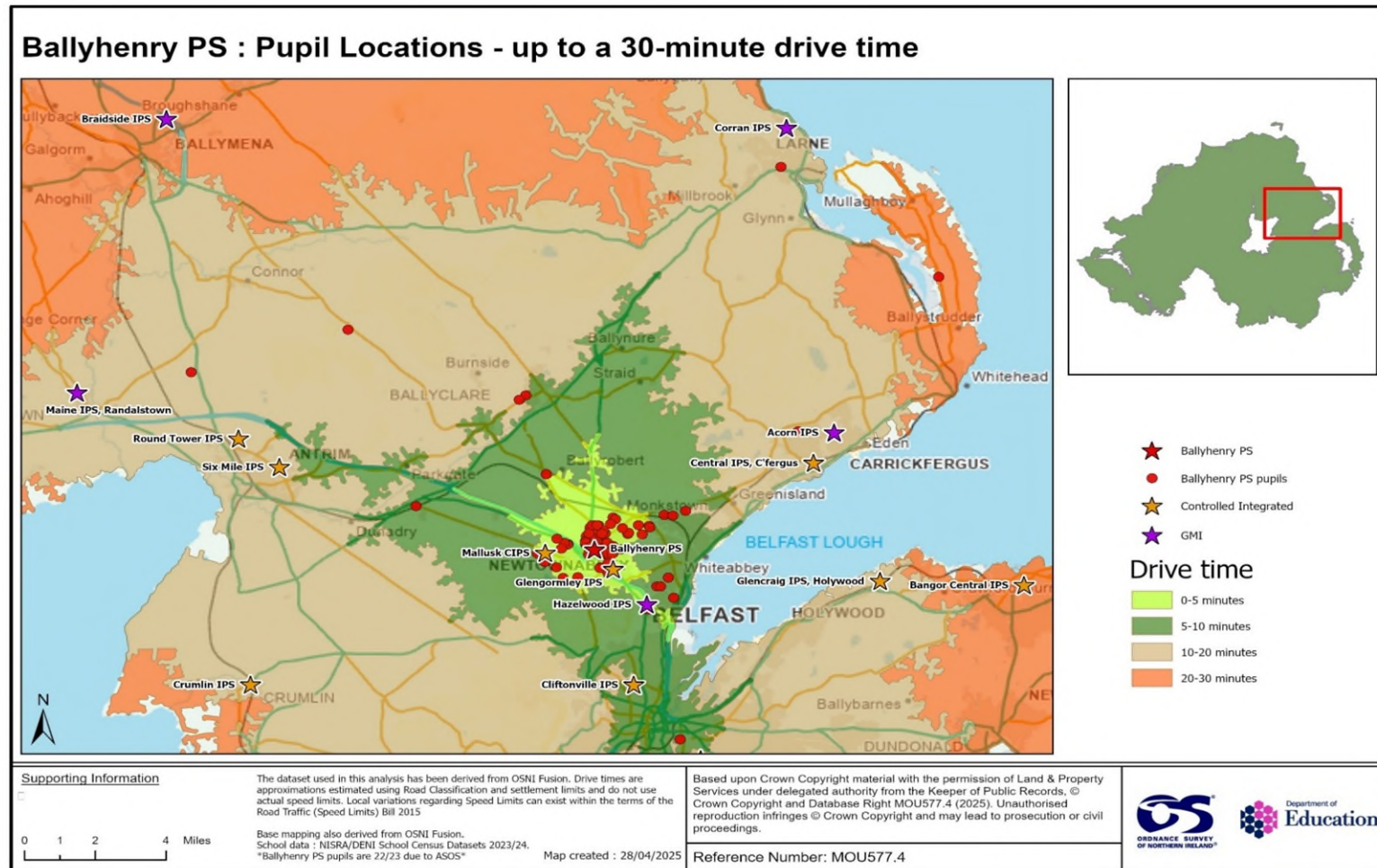
Map 1: Ballyhenry PS – Neighbouring Primary Provision (one and two-mile radius)



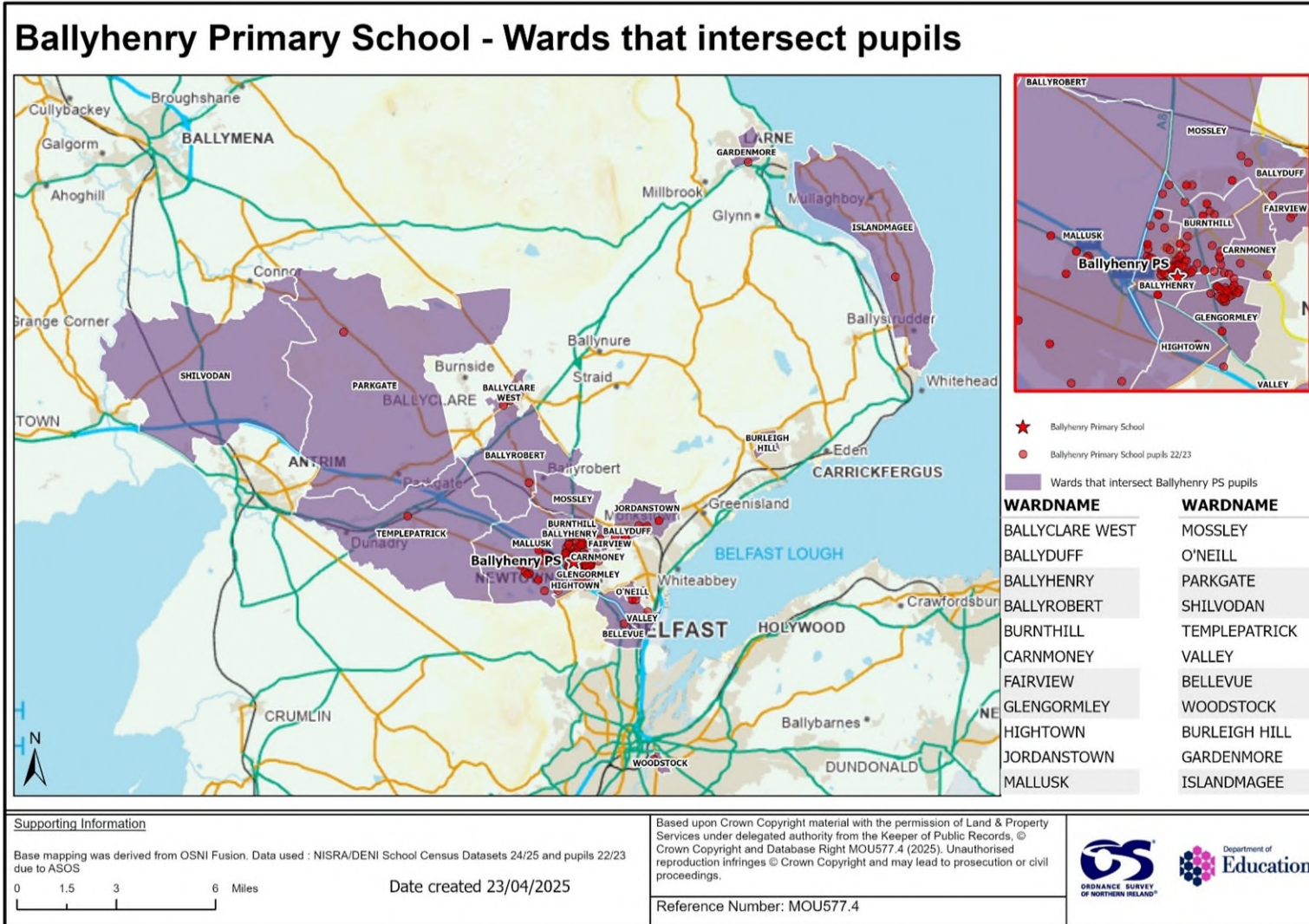
Map 2: Ballyhenry PS – Pupil locations and Neighbouring Integrated Primary Provision – Three-mile radius



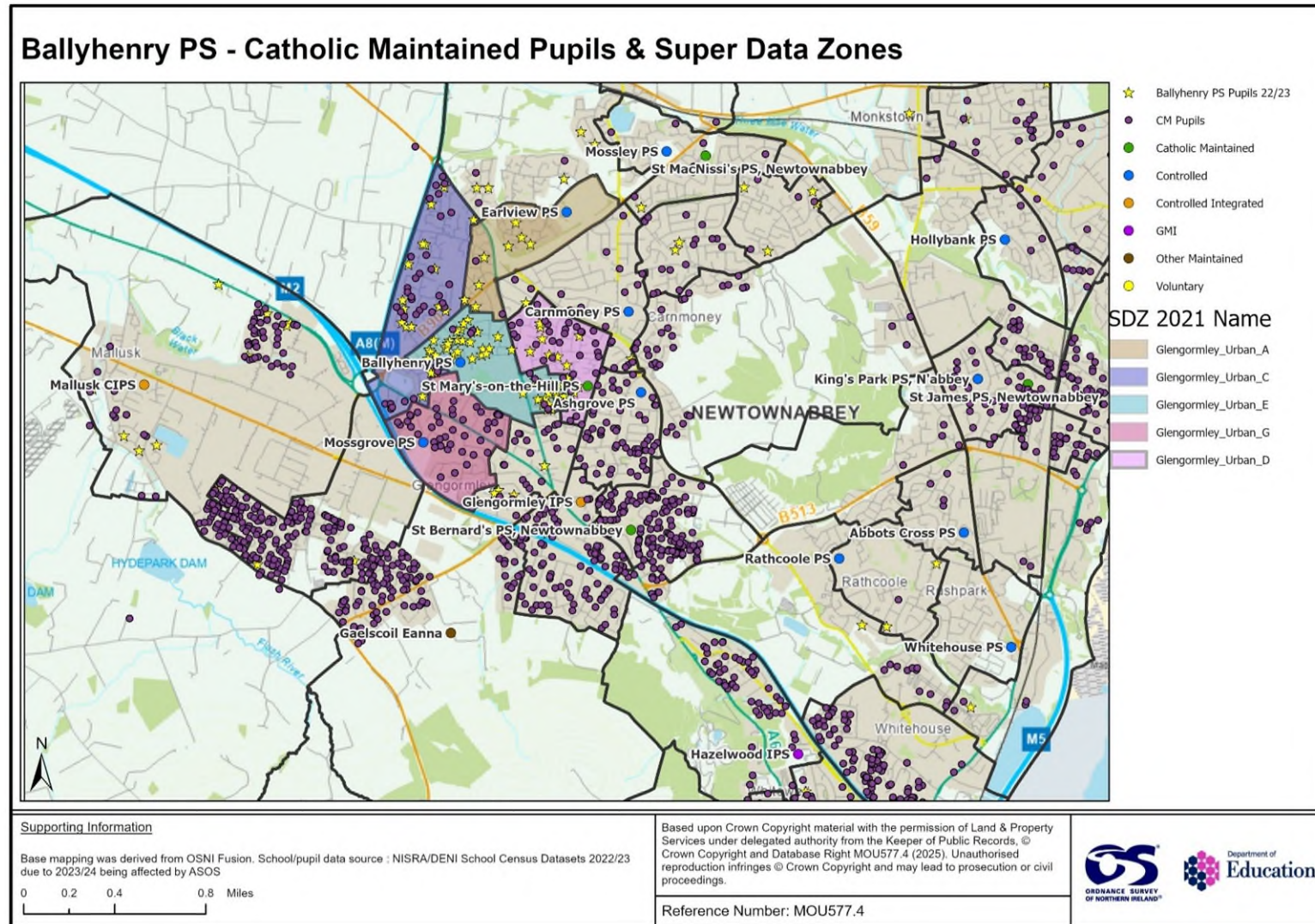
Map 3: Ballyhenry Primary School – Neighbouring Integrated Primary Provision – 30 mins drive-time buffer from Ballyhenry Primary School



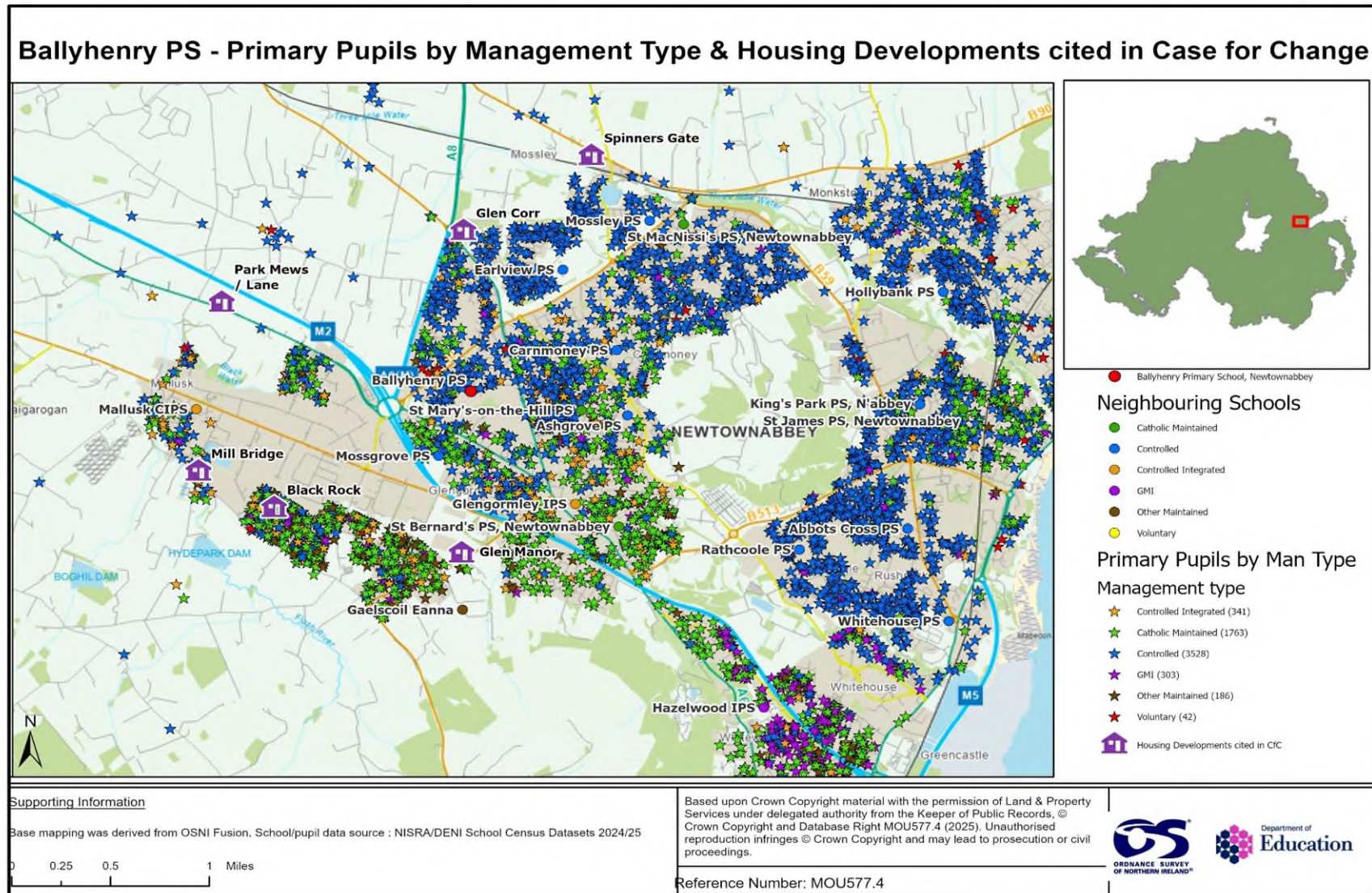
Map 4: Ballyhenry Primary School – Wards in which Ballyhenry PS pupils reside



Map 5: Ballyhenry PS pupils - Super Data Zones and Catholic Maintained pupil locations (within 3-mile radius)



Map 6 – Ballyhenry PS – Available Primary Pupils by Management Type & Housing Developments cited in CFC



Map 7 - Ballyhenry PS Pupils & Housing Developments cited in CfC

