

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	DP 745
School	Killowen Primary School
Proposal	Killowen Primary School will transform to Controlled Integrated Status, with effect from 1 September 2025, or as soon as possible thereafter.
Ministers Decision	Not Approved
Date of Decision	30/08/2026
Ministers 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</i>
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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.

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?

Integrated schools and religious balance

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." 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 28 pupils, * of which were designated as Catholic, indicating *% intake. If one considers only those pupils which are designated as Protestant or Catholic (18) this is *% of the intake. 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 13.27% 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.
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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.

What is the basis to believe that reasonable numbers of Catholic children are likely?

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 note some of the officials' advice is based on the 24/25 statistics rather than the updated 25/26 figures. My analysis is based on the updated figures.

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 (para 55 & chart 5),
- (b) an acceptance that post-transformation, it would be expected that the number of Catholic children would increase,
- (c) a modest increase in the number of Catholic children in recent years to 24/25 along with figures from the revised approach in 25/26,
- (d) the transformation plan augmented by the updated letter from the Governors.

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.

I note from the Case for change that a range of measures were proposed to increase religious diversity at the school such as, school staff and students attend the Holy Communion celebrations of pupils, curriculum-linked visits to local Catholic churches and increasing connections with the local Parish Priest, expanding cultural celebration events to include traditions relevant to the Catholic/Irish community, partnering with the local GAA club to offer sports taster

	sessions. The extent to which these will result in a significant increase in the percentage of Catholic children at the school is unclear. The fact that a transformation plan exists is not evidence that it will deliver reasonable numbers of Catholic children. At paragraph 101, officials note the “IE Team’s view is 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.” The parental ballot is evidence of unmet demand with from a total of 263 eligible voters, 218 votes were cast (82.9% turnout) with 165 votes in favour of the Transformation (75.7%) and 53 votes (24.3%) were not in favour of the Transformation. Further, I note at para 103, officials conclude, “there is an absence of sufficient evidence, such as Eol forms, to set out how an increase in the number of pupils from the minority community over the next seven years can be achieved to reach reasonable numbers, with an aspiration for the relative proportions of the two religions to be similar.” 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. There is nothing in the section 3 bodies’ responses that provides compelling evidence that the reasonable numbers test is likely to be met. I note that there is no alternative Integrated Primary School in Coleraine though there are two integrated Primary school options within ten miles. These both have spare capacity (145 spaces) and the percentage of Catholic children at the schools are 6.5% and 21.3%. 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. <i>With the exception of the revised approach in 2025/26 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</i>
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	<i>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.</i> 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 Expression of Interest data provides no support for the proposition that future enrolment from the minority community is likely to increase to the extent required. On the basis of the evidence from 2024/25 and every previous year for which statistics are available – notwithstanding arguments to the contrary - I would have no difficulty in concluding that the reasonable numbers test was not met. However, the 2025/26 statistics warrant further consideration. I note, the school provided additional information which is included in Appendix J and states <i>“to improve data collection accuracy, we asked not just the Primary 1 intake parents, but all parents/carers to complete the DE census form and we encouraged parents in doing so to be more open about their child’s religious background. It is very interesting to see the huge difference this has made in our whole school religious balance, from 5% designated Catholic in 2024/25, to 14% in 2025/26.”</i> It would appear that the school accept that the 25/26 figures are largely attributed to a different approach being encouraged to how the DE census is returned as opposed to any actual (or any substantial at the very least) increase in the number of Catholic children attending the school. In such circumstances, it does not appear that there is any significant momentum to the reasonable numbers requirement being met. Taken collectively, the evidence does not establish that the achievement of reasonable numbers of Protestant and Roman Catholic pupils is likely.
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	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. The Department has recently instituted a new process to assist schools which wish to transform. Killowen may be well placed to benefit from this scheme.	
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 – 2 July 2026)
(Cleared by Sharon Smyth – 2 July 2026)

Date: 3 July 2026

To: Paul Givan MLA
Minister of Education

Copy distribution below

**DEVELOPMENT PROPOSAL (DP) 745 – KILLOWEN PRIMARY SCHOOL
TRANSFORMATION TO CONTROLLED INTEGRATED STATUS**

Issue: To decide on Development Proposal (DP) 745, published by the Education Authority (EA) on behalf of the Board of Governors (BoG) of Killowen Primary School (PS) which proposes that:-

Killowen 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 the 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 contents of this report are likely to be fully disclosable with appropriate redactions.

Statutory Duty Implications

Article 64 of the Education Reform (Northern Ireland) Order 1989

Integrated Education Act (Northern Ireland) 2022

Shared Education Act (Northern Ireland) 2016

Rural Needs Act (Northern Ireland) 2016

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:

There is ongoing local media interest in integrated education. It is likely there will be local media interest in your decision. Should any queries arise, the Press Office can refer to this submission and liaise 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 745; and
- II. If content, agree this submission (with any appropriate redactions) and the DP 745 decision can be published on the Department's website once the Board of Governors of Killowen Primary School and the Education Authority have been informed of the decision.

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Appendices (attached separately)

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Appendix F	IEF Response
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Appendix H	Statutory Objection Period Responses Summary
Appendix I	Copy of S3 letter issued to NICE, IEF & CSSC
Appendix J	School update relating to Reasonable Numbers
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Appendix L	Assessment against Transformation Guidance
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Introduction

1. Development Proposal (DP) 745 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 Killowen Primary School (PS), following a ballot held in accordance with Article 70 of the 1989 Order (as applied by Article 91).

2. DP 745 was published by the EA on 9 April 2025 and proposes that:-

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

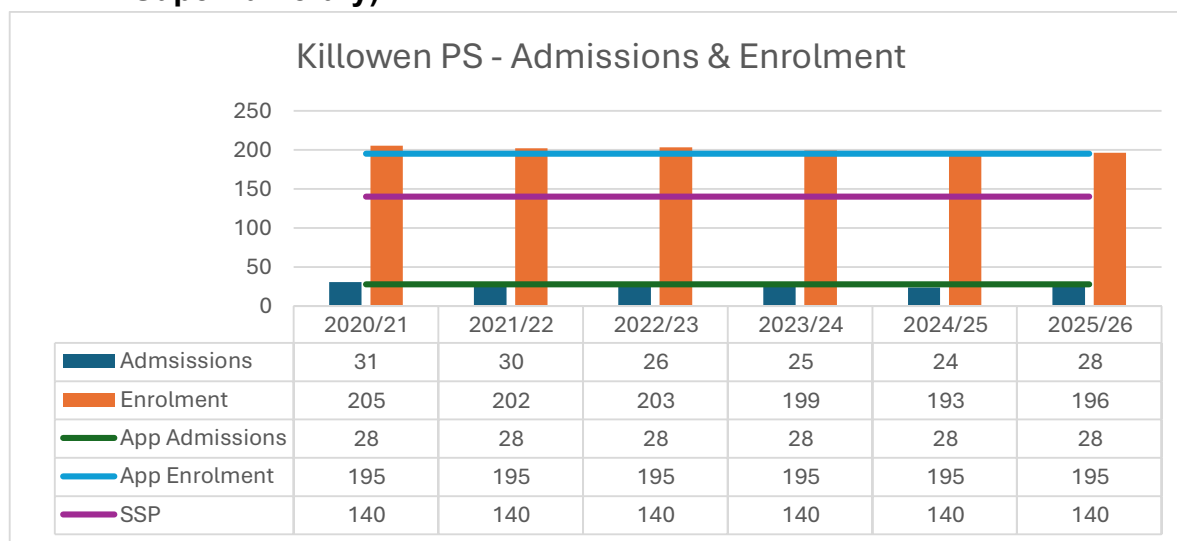
3. The statutory two-month objection period ended on 9 June 2025. A copy of the published DP and the BoG's supporting Case for Change (CfC) are attached at **Appendices A** and **B** respectively.
4. The assessment of this DP has been impacted by the Judicial Reviews in relation to the Court of Appeal judgement on DP 727 (JR 335 - Bangor Academy) and DP 728 (JR 336 - Rathmore Primary School).

Background – Killowen Primary School

5. Killowen PS is a Controlled, co-educational primary school located on Shuttle Hill, Coleraine in the Causeway Coast and Glens Local Government District (LGD). The approved admissions and enrolment numbers for Killowen PS are 28 and 195 respectively.
6. The school's catchment area is illustrated on [Map 1](#) and shows the location of the school's pupils along with alternative primary schools within a two-mile radius. [Map 3](#) shows alternative Integrated primary schools and their pupils within a 10-mile mapping radius.
7. On the Northern Ireland Multiple Deprivation Measure 2017, the Churchland Super Output Area (SOA), in which the school is located, is placed 172 out of 890 (1 being most deprived and 890 least deprived) and is classified as urban.
8. In 2025/26, Killowen PS had an actual admissions and enrolment of 28 and 196 respectively, including 18 (9.18%) pupils with a Statement of Special Educational Needs (SEN), 83 (42.3%) pupils with Free School Meal Entitlement (FSME), and 43 available places.

9. [Chart 1](#) illustrates the pattern of admissions and enrolment at Killowen PS over the past six years. The school has admitted close to or above its approved admissions number (28) in each of the last six years, peaking at 31 in 2020/21. The school's actual enrolment of 196 in 2025/26 is above the Sustainable Schools Policy (SSP) minimum recommended enrolment of 140 for a sustainable urban primary school and 2026/27 figures from the EA at the conclusion of the admissions process indicate that the school received 29 first preference applications for Year 1.

Chart 1: Historical Admissions & Enrolments at Killowen PS (Figures inc Supernumerary)



Source DE Census - Figures include Supernumerary children.

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

Table 1 – Killowen PS – Religious Balance

	Protestant	Catholic	Other Christian	Non Christian	No Religion/Religion Unknown
2021/22	38.12%	*	*	0.00%	53.47%
2022/23	36.95%	3.45%	8.87%	0.00%	50.74%
2023/24	40.70%	3.02%	11.06%	0.50%	44.72%
2024/25	41.45%	5.18%	11.40%	1.55%	40.41%
2025/26	47.96%	13.27%	7.14%	3.57%	28.06%

Source: School Census data

Integrated Education - Legislation and Case Law

11. The legislative process for proposals to transform to integrated status is outlined in the Education Reform (Northern Ireland) Order 1989².
12. 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.'*
13. The Department's assessment of Killowen PS in the context of DP 745 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.
14. 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'*.
15. 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.'*
16. 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.
17. On 7 December 2023 the BoG passed a resolution to initiate a parental ballot. The ballot was conducted by Civica Services from 20 February 2024 until 8 March 2024 in respect of a proposal to transform to Controlled Integrated Status from 1 September

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

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

2025, or as soon as possible thereafter. From a total of 263 eligible voters, 218 votes were cast (82.9% turnout) with 165 votes in favour of the Transformation (75.7%) and 53 votes (24.3%) were not in favour of the Transformation.

18. 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.
19. 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

20. 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.
21. The Department's [Transforming Together - Understanding the Pathway to Integrated Education](#)⁴ (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.
22. 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 15](#) above.

⁴ *It is noted that DP 745 was developed and progressed in advance of the publication of the revised guidance.*

23. 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.
24. Using the information provided in the CfC⁵ and the updated information and Transformation Action Plan provided in **Appendix J**, the assessment of DP 745 will be carried out against the areas listed in [paragraph 21](#). 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

25. 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.
26. The CfC provides an in-depth overview of the level of engagement that has been undertaken by the school in respect of the transformation process. It is clear from the information detailed and provided in the Transformation Action Plan (TAP) that the school is committed to transforming to Controlled Integrated status and presents evidence that, through transformation, it believes it will continue to work effectively at sustaining diversity and balance within the school. The school will provide an integrated pathway from primary to post primary education at Causeway Academy.
27. In this case, Killowen PS has engaged in a sustained and thorough exploration process since 2020, working closely with IEF and NICIE and involving governors, staff, parents, and pupils at every stage. Through consultations, information sessions, and community engagement, the school has assessed changing demographics and gauged support for transformation. Both IEF and NICIE recognise the school’s extensive preparation, inclusive approach, and ongoing professional development, including staff training and readiness assessments, as evidence of its commitment to creating a more inclusive, diverse, and integrated school environment.

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

Sustainability

28. The full sustainability assessment of Killowen PS can also be found at **Appendix L**.
29. Killowen PS demonstrates many of the key characteristics of a sustainable and effective school. Inspection evidence from ETI highlights very good provision, strong leadership, and a clear capacity for continued improvement, with more recent input confirming that the school has progressed well since 2019 and continues to deliver good outcomes in literacy and numeracy. Enrolment levels, while reflecting a slight demographic decline, remain stable and above the minimum sustainability threshold for urban primary schools. The school is well embedded in its local community, with strong partnerships and longstanding engagement in shared education, and benefits from high levels of parental support, evidenced by the significant majority backing transformation to Integrated status. The school, however, is in a deficit budget position in excess of the tolerance stipulated by the Department. Overall, Killowen PS is a well-led, community-focused school with solid educational performance and clear potential to sustain and further develop its provision. The sustainability assessment of the school shows that the school is deemed to be sustainable at the present time, however it will need to take steps to address its financial position.
30. 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

31. 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).'*
32. 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'.

33. 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.
34. 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.
35. The school undertook a careful and extended consultation process with stakeholders, beginning before the COVID-19 pandemic and continuing afterward. There is currently no Integrated primary school in Coleraine, with the nearest option (Mill Strand IPS in Portrush) located over five miles away. Following engagement with parents and the community, the Board of Governors held a parental ballot in early 2024. This achieved a high turnout (82.9%), with a strong majority (75.7%) voting in favour of transformation indicating clear parental support.
36. 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.
37. 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.

38. While the CfC highlights a strong parental mandate and includes 10 letters from local businesses, youth groups and Clare Sugden MLA in terms of community support, it does not provide data from formal Expressions of Interest (EOI). However, evidence suggests some existing demand for Integrated education in the area, as pupils from Coleraine already attend nearby integrated schools such as Mill Strand IPS and to a lesser extent Ballymoney Model IPS.
39. Admissions and enrolment trends for nearby integrated schools show some fluctuation but overall stability, with both Mill Strand IPS and Ballymoney Model IPS maintaining sustainable pupil numbers. Although some schools have experienced gradual declines in admissions, Killowen PS itself has shown relatively steady figures, despite a broader pattern of declining admissions across the sector.
40. In conclusion, the Department considers there to be some evidence of demand for Integrated education in the Coleraine area, supported by the strong parental ballot outcome and existing patterns of enrolment of children from Coleraine in nearby Integrated schools. While the absence of EOI data is noted, community support and demand indicators suggest that the proposed transformation would meet a need and would likely have minimal impact on other local integrated schools. A full assessment of demand can be found at **Appendix L**.

Alternative Primary Provision

41. To satisfy the duty under the Integrated Education (Northern Ireland) Act Section 5 (1)(a) and (b) (as outlined in [paragraph 31](#) above), it is important to look at alternative provision in the local area. Key statistical data including alternative primary provision is provided in **Appendix K**.
42. **Table 1 (Appendix K)** provides a snapshot of neighbouring provision within a two-mile mapping radius and also details neighbouring Integrated provision within a 10-mile mapping radius. A full breakdown of provision is also located at **Appendix K**.
43. Across neighbouring provision, there is significant surplus capacity in all sectors. Within Integrated provision, two schools within a 10-mile radius (**Map 3**) have enrolments well above sustainability thresholds. Both are, however, under-subscribed at admission stage, with a combined 145 available places and some overlap in pupil catchments with Killowen PS, particularly Mill Strand IPS as depicted in **Map 3**, indicating pupils in the Coleraine area are already choosing to attend an Integrated school. In the Controlled sector, there are six schools within a 2-mile radius (**Map 2**) which show substantial excess capacity, with 506 available places (rising to 521 when Killowen PS is included), and overall admissions below approved levels, although two schools are oversubscribed. Similarly, Catholic Maintained provision also has surplus capacity, with both local schools under-subscribed and 132 available places. Overall, the data indicates a pattern of unused capacity across all sectors in the area.

44. Incorporating all the schools within the two-mile radius, including Killowen PS, and both Integrated primary schools within 10 miles (Mill Strand IPS and Ballymoney Model CIPS) there were a total of 3334 approved enrolment places, with an actual enrolment of 2785 (including supernumerary places) and 352 admissions to Year 1. This results in 798 available places across the area.
45. 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.
46. [Table 2](#) below shows the subscription details for Integrated primary schools in the wider Causeway Coast and Glens council area.

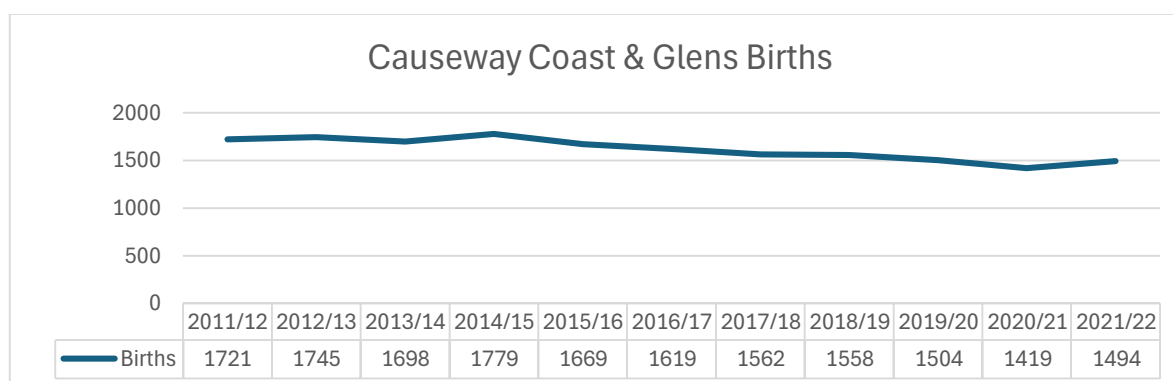
Table 2: Causeway Coast and Glens						
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Approved Year 1 Admission Numbers	189	189	189	189	191	191
1st Preference Applications (% over/under subscription)	157 (-16.9%)	156 (-17.5%)	143 (-24.3%)	145 (-23.3%)	129 (-32.5%)	155 (-18.8%)

47. [Table 2](#) shows consistent undersubscription for integrated primary schools in this wider area with 2025/26 at -18.8%.

Area Planning Context

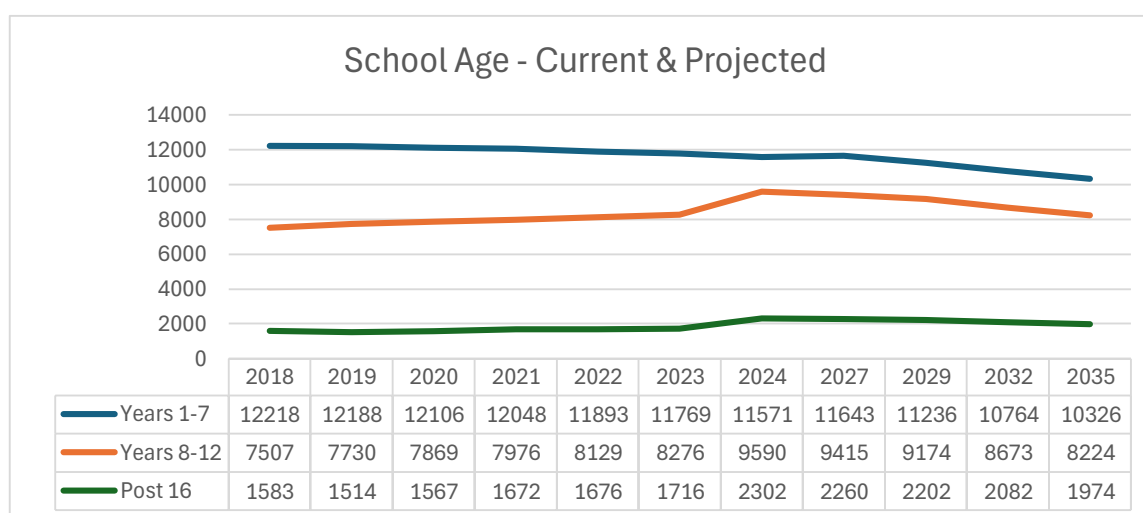
48. As outlined in the Integrated Education (Northern Ireland) Act 2022 (section 5 (1)), the area planning context must be taken into consideration when identifying the Department's duty to support integrated education.
49. The assessment includes how the proposal aligns with the current Strategic Area Plan and Operational Plan and how it will contribute to the delivery of sustainable education provision within the geographical area and school estate.
50. This DP for the proposed Transformation of Killowen PS to a Controlled Integrated school is referenced as a short-term work stream in the EA's Operational Plan (OP2) with the key theme of "Increase parity of access for all to appropriate pathways".
51. OP2 includes population projections provided by the Northern Ireland Statistics and Research Agency (NISRA). For the Causeway Coast and Glens LGD, it shows a declining birth trend ([Chart 2](#)). The numbers have fallen from 1721 to 1494 in 2021/22. This downward trend is projected to continue for primary and post-primary age pupils as presented in **Chart 2**. [Chart 3](#) shows school age population from 2018 to 2035 and illustrates a reduction in the school age population for Years 1-7 from 11769 (2023) to 10326 (2035) representing a 12.26% decline.

Chart 2 – Causeway Coast & Glens Births (2011/12-2021/22)



Source – NISRA

Chart 3 - Historic, Current and Projected School Age Pupils in Attendance at Primary and Post Primary Schools in Causeway Coast & Glens Council area)

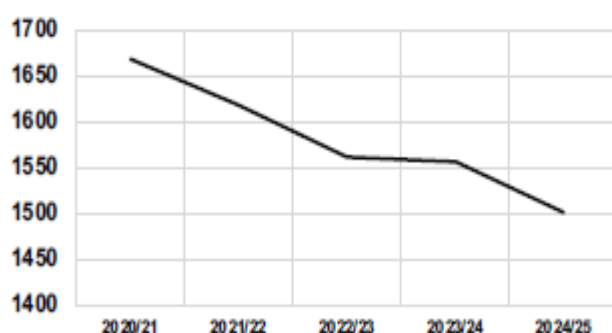


Source: DE Census Data/NISRA

52. [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 has declined and, therefore, the number of Year 1 places required has decreased.

Table 3 Projected births Causeway Coast & Glens LGD

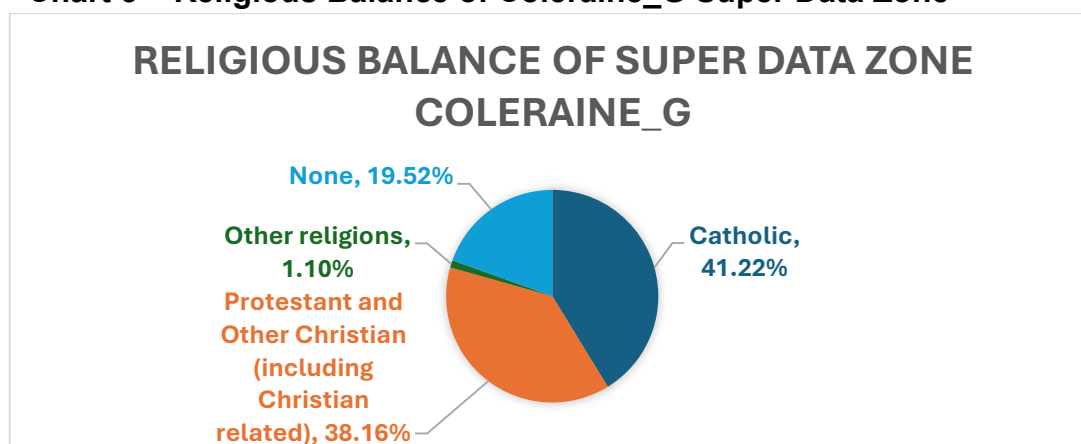
Chart 4 – Year 1 Places Required



Academic Birth Year	Causeway Coast & Glens LGD Births	Variance from Previous Year	Year 1 start
2018/19	1558	-4	2023/24
2019/20	1504	-54	2024/25
2020/21	1419	-85	2025/26
2021/22	1494	75	2026/27

53. DP 745 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 195 Controlled places in the area to 195 Controlled Integrated places. Given the abundance of available Controlled places in the area (506 not including Killowen), the Transformation of Killowen PS would help streamline Controlled provision in the area. Available places at neighbouring alternative primary schools would be able to accommodate parental preference for Controlled provision.
54. NICIE comments that Killowen PS is committing to the delivery of Integrated Education and the development of the Integrated ethos within the school and is reassured by the school's starting position and its significant efforts to date. The school has capacity, appetite and ability to deliver sustainable, high quality Integrated Education and develop the Integrated ethos.
55. [Chart 5](#) below shows the religious balance of the Coleraine_G Super Data Zone (SDZ) in which Killowen PS is located, based on data from the most recent Census (2021).

Chart 5 – Religious Balance of Coleraine_G Super Data Zone



Source: Census 2021

56. The CfC asserts that the majority of its pupils attending the school come from Coleraine_F and Coleraine_G SDZs and since 2016/17 there has been a decrease in the number of pupils identifying as both Protestant and Catholic and an increase in those identifying as Other Christian/Non-Christian/No Religion/Unknown and attracts a significantly higher proportion of those who identify as Other Christian/Non-Christian/No Religion or Unknown when compared to the community balance. The CfC further asserts the growth of families designating children as 'Other/No Religion' is observed across many other schools in Northern Ireland and in particular in Controlled schools.
57. [Table 3](#) illustrates the historic religious balance at Killowen PS and shows that the religious balance of pupils attending the school has changed over the past seven years and does not align with the religious balance of the area. [Table 4](#) details that the percentage of pupils identifying as Protestant has fluctuated over time while the

percentage of those identifying as Catholic has increased from 6.37% to 13.27%. It also highlights that the number of pupils identifying as Other Christian has also fluctuated over time from 4.90% to 7.14% while those with No/Unknown religion has decreased significantly from 50.49% to 28.06%. [Chart 5](#) above shows that the area is predominantly Catholic with a mixture of other religions and the school should be able to continue to attract pupils from a Catholic background.

Table 4 – Killowen PS - Religious Balance trends (Years 1-7)

	Protestant	Catholic	Other Christian	Non Christian	No Religion/Religion Unknown
2019/20	38.24%	6.37%	4.90%	0.00%	50.49%
2020/21	40.00%	2.93%	4.88%	0.00%	52.20%
2021/22	38.12%	*%	#%	0.00%	53.47%
2022/23	36.95%	3.45%	8.87%	0.00%	50.74%
2023/24	40.70%	3.02%	11.06%	0.50%	44.72%
2024/25	41.45%	#%	11.40%	*%	40.41%
2025/26	47.96%	13.27%	#%	*%	28.06%

Source: School Census Return 2019/20 – 2025/26

58. In an update to the CfC provided by the school in February 2025, it is asserted that the Governors have plans to actively adapt admissions criteria to attract children from the minority religions attending the school in the near future and it is noted in the TAP that the school recognises that children from the Catholic community are a minority enrolment within the school and to better cater for existing Catholic children and in anticipation of greater numbers of Catholic children coming to the Killowen PS, the school will be reviewing the RE policy and moving to include Sacramental preparation on site as opposed to off-site as it currently is.
59. The CfC asserts that Killowen is a school striving for inclusivity, and transformation would enable the school to celebrate this further and with even greater intention. Killowen upholds this strong commitment, working closely with neighbouring schools. Within the CfC it states *“we are currently exploring the pathway to becoming a Rights Respecting School. It is paramount to Killowen PS that we cultivate an environment where all pupils are encouraged to recognise and respect the fundamental rights of every child.”*
60. Commentary from NICIE asserts Killowen PS is well positioned to deliver on all elements of Sections 1 and 2 of the 2022 IE Act, and states, *“the school has existing religious diversity, although the level of diversity is difficult to accurately quantify because 53.4% (103 out of 193 total enrolment) of the pupils are classified by the DE census data as ‘other’”*.

61. NICIE continues *“In the 2024/25 DE data 90 pupils have been designated as either ‘Protestant’ or ‘Catholic’ by the person completing the school registration form/DE annual census form on their behalf. Of this group of 90, 10 pupils have been designated as ‘Catholic’, indicating that 11% of those who have designated a religion, have designated ‘Catholic’. This intake is prior to the school initiating the Transformation Plan and so this is an indication that the school can meet the ‘meaning’ of Integrated Education as outlined in Section 1 of the 2022 Act: ‘those of different cultures and religious belief and none, including reasonable numbers’ of both Protestants and Catholics. The existing, and growing, religious diversity in the local demographics and the ability of Mill Strand Integrated primary school to achieve religious balance are further evidence in this regard.”*
62. NICIE’s input states that the school has indicated that 12.5% of this year’s Primary 1 intake have been designated as ‘Catholic’ and the school has set an aim to increase this to 15% for the Primary 1 intake in September 2026.
63. In considering Religious Balance and the Department’s position on “Reasonable Numbers” and the General Principle for Transformation, the Department notes the following stated in the CfC :-

“In order to continue to develop the religious balance in the school, the school has set out clear, time-bound actions in the 2025–2026 Transformation Plan (Appendix 2). The school has indicated that 12.5% of this year’s Primary 1 intake have been designated as ‘Catholic’ and the school has set an aim to increase this to 15% for the Primary 1 intake in September 2026. We have outlined some actions below which we view as evidence of the school’s commitment to developing the cultural and religious belief/background diversity in the school.

- *School staff and students attend the Holy Communion celebrations of pupils, curriculum-linked visits to local Catholic churches and increasing connections with the local Parish Priest.*
- *Promoting school open days through The Irish News.*
- *Expanding cultural celebration events to include traditions relevant to the Catholic/Irish community.*
- *Hosting public events showcasing the school’s inclusive ethos and practices.*
- *Increasing social media posts about Integrated values and activities.*
- *Personal Development and Mutual Understanding (PDMU) teaching and learning has been reviewed and expanded in relation to diversity.*
- *Visits to other Integrated schools to learn about how they have built cultural and religious/belief diversity in the pupil population.*
- *Partnering with the local GAA club to offer sports taster sessions.*

- *Engaging with the Framework for Integrated Education^[1] to assist in the development and implementation of the Integrated ethos.”*

64. **Table 5** illustrates the religious balance at Killowen PS for 2024/25 by Year Group and confirms that 12.5% of pupils are recorded as Catholic in Year 1.

Table 5 Killowen PS - Religious Balance 2024/25 by Year Group

Year	No religion/ unknown	Percentage	Other	Percentage	Protestant	Percentage	Catholic	Percentage	Total	Percentage
1	6	25.00%	*	*	11	45.83%	*	*	24	100.00%
2	8	32.00%	*	*	12	48.00%	#	#	25	100.00%
3	10	38.46%	*	*	8	30.77%	*	*	26	100.00%
4	12	36.36%	*	*	17	51.52%	#	#	33	100.00%
5	12	41.38%	*	*	12	41.38%	*	*	29	100.00%
6	17	70.83%	*	*	*	12.50%	*	*	24	100.00%
7	13	40.63%	*	*	17	53.13%	#	#	32	100.00%
Total	78	40.41%	25	12.95%	80	41.45%	10	5.18%	193	100.00%

Source: School Census data

65. **Table 6** below shows that in 2025/26, the Year 1 intake was 28 pupils, three of which were designated as Catholic, indicating 10.7% intake. If one considers only those pupils which are designated as Protestant or Catholic (18) this is 16.66% of the intake.

Table 6: Religious designation of pupils at Killowen PS 2025/2026

Year	No religion/ unknown	Percentage	Other	percentage	Protestant	Percentage	Catholic	Percentage	Total	Total %
1	8	28.57	*	*	15	53.57	*	*	28	100
2	6	24.00	*	*	11	44.00	*	*	25	100
3	6	22.22	*	*	14	51.85	*	*	27	100
4	*	*	*	*	12	48.00	#	#	25	100
5	12	36.36	*	*	17	51.52	*	*	33	100
6	9	27.27	#	#	14	42.42	*	*	33	100
7	9	36.00	*	*	11	44.00	*	*	25	100
Total	55	28.06	21	10.71	94	47.96	26	13.27	196	100

Source: School Census data

66. Based on the Year 1 enrolment data for Killowen PS in both 2024/25 and 2025/26, the school appears likely to be able to meet the Department's General Principle for Transformation in the first year after transformation, given it has done so in these years.

^[1] <https://nicie.org/ea-and-nicie-launch-a-framework-for-integrated-education/>

67. In considering the 15% principle in 2024/25, 21.4% of Year 1 pupils were designated as Catholic, and in 2025/26 this figure was *%, both exceeded the required 15% threshold (for the first year after transformation).
68. The Department notes that the percentage of Catholic pupils has fluctuated over the seven-year period 2019/20 – 2025/26 and has noted an overall increase in the percentage of Catholic pupils from 6.37% to 13.27% in 2025/26.
69. The Department notes that the rise in the number of pupils designating as Catholic has increased significantly in 2025/26. Following your visit in September 2025 the school provided additional information which is included in **Appendix J** and states *“to improve data collection accuracy, we asked not just the Primary 1 intake parents, but all parents/carers to complete the DE census form and we encouraged parents in doing so to be more open about their child’s religious background. It is very interesting to see the huge difference this has made in our whole school religious balance, from 5% designated Catholic in 2024/25, to 14% in 2025/26.”*
70. More details on the assessment against the transformation areas can be found at **Appendix L**. Comments from other policy areas in the Department of Education can be found at **Appendix C**.

Consultation Process

71. 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.’*
72. 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’.*
73. The Department has identified Northern Ireland Council for Integrated Education (NICIE), the Integrated Education Fund (IEF) and the Controlled Schools Support Council (CSSC) as relevant bodies for the purposes of such consultation.
74. On 11 April 2025 the Department wrote to each of these bodies, seeking their views on DP 745. A copy of that letter issued to NICIE can be found at **Appendix I**, which is the same for all S3 bodies.

75. 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 D, E and F** respectively.

76. CSSC responded as follows

- CSSC supports sustainable controlled schools seeking to transform to controlled integrated status within the context of area planning and the overall sustainability of the estate taking account of local demographics and community support. As a sustainable school, CSSC supports Killowen Primary School in seeking to transform to Controlled Integrated status.
- CSSC notes the positive outcome of the parental ballot and that as a controlled school, Killowen Primary School, already welcomes children from different socio-economic backgrounds, children with different abilities and children from all faiths and none, which is consistent with the definition of the IE Act.
- CSSC acknowledges that Killowen Primary School has demonstrated its strong connections both in the immediate diverse community, in which it is located, and the wider community. Its Shared Education partnership with St John's Primary School along with other community projects reflect the school's inclusive ethos.
- Governors have drawn attention to how the school has progressed the transformation process and noted the significance of the high percentage of 'others' attending Killowen PS. It will be important that the transformation journey continues to address the requirements regarding reasonable numbers of pupils from both communities.
- There are no Integrated primary schools within the immediate Coleraine area, the nearest integrated school being Mill Strand in Portrush. With the provision of a new non-selective Post Primary Controlled Integrated School opening in Coleraine the transformation of Killowen PS would secure an integrated pathway for pupils from primary through to post-primary provision within the town.
- CSSC will continue to support Killowen Primary School and is committed to working with the Education Authority and other educational partners to ensure the school is effectively supported during this process.

77. IEF responded as follows

- IEF welcomes the DP for Transformation of Killowen PS. This proposal was submitted in response to parents at the school voting overwhelmingly by some 75% in favour to take the school on the path of Transformation to Integrated status.
- The school leadership team has shown commitment to the process throughout, ensuring that the decision to explore Transformation was made with consensus. The school has availed of support and guidance from the IEF and NICIE, throughout its exploration phase of Transformation.
- A positive decision will not only create more Integrated Education places in the Coleraine area, in response to the democratic wishes of parents, but will help the Department of Education and the EA fulfil their statutory duty.
- Killowen PS is a well-resourced, sustainable school with staff committed to providing the best opportunities for the children they teach. There are robust plans in place to increase the minority tradition significantly and their recent addition of a SPIMS Unit reflects their commitment to equality of access for all children.
- There is currently no Integrated Primary School provision in Coleraine. This represents a significant gap for families actively seeking this type of education.
- We look forward to further supporting Killowen PS as the school furthers its exploration of Transformation to Integrated status and will continue to invite the school to apply for grants to support the Transformation process in as far as our own limited charitable funding allows.

78. NICIE responded as follows:

- NICIE has expressed full support for the proposal. This endorsement follows a thorough and inclusive consultation process that has taken place over several years, involving parents, staff, pupils, and the wider community. The transformation initiative aligns with the statutory duties outlined in the Integrated Education Act (Northern Ireland) 2022 and the Education Reform (Northern Ireland) Order 1989, which mandate the Department of Education to encourage, facilitate, and support Integrated Education.
- Killowen PS has demonstrated strong community backing for the transformation, with a parental ballot showing a high turnout of 82.9% and 75.7% voting in favour of Transformation. The school has also engaged in extensive planning and reflection, producing a multi-year Transformation Plan that has been monitored and supported by NICIE and the EA.

- The school's enrolment has remained stable, with 193 pupils in the 2024/25 academic year, indicating its sustainability. Furthermore, the school meets all six criteria of the Department's SSP, including high-quality education, sound financial management, effective leadership, and strong community links.
- A key aspect of the proposal is the school's religious and cultural diversity. While a significant portion of the student population (53.4%) is categorized as 'Other' in terms of religious designation, the school has a meaningful representation of both Protestant (41.5%) and Catholic (5.2%) pupils. The school has set clear targets to increase Catholic enrolment and has implemented a range of initiatives to promote inclusivity, such as celebrating diverse cultural and religious events, enhancing curriculum content, and building partnerships with local religious and cultural organizations.
- The transformation is also supported by area planning considerations, with limited Integrated school places available locally and no objections from affected schools. The proposal is seen as a timely and necessary step to meet growing parental demand for Integrated Education in the Coleraine area. NICIE highlights that the transformation will not negatively impact existing Integrated provision and will instead enhance educational choice and inclusivity in the region.
- NICIE views the transformation of Killowen PS as a natural progression that reflects the evolving values of the local community. The school's inclusive ethos, strong leadership, and commitment to Integrated Education position it well to thrive in its new status. The proposal supports broader educational and societal goals, contributing to a more cohesive and inclusive Northern Ireland.

79. All bodies support the proposal and encourage the Department to take a decision in regard to its statutory duties to encourage, facilitate and support Integrated education. All bodies note the support for Integrated Education via the positive parental ballot, the inclusive nature and ethos of the school and that the enrolment of the school is above the minimum threshold.
80. Within NICIE's response it is stated that "it is our view that this proposal reflects a shared vision for the future of education in the Coleraine area, demonstrating community-driven desire to create a school where children from all religious and cultural traditions will learn together every day. The school views the proposed Transformation to Integrated status as a natural and progressive step in the school's journey, reflecting the changing values and aspirations of families in Coleraine and beyond."

Pre-publication consultation

81. The CfC asserts that the BoG, as proposer, undertook the required consultations with governors, staff, and parents/guardians. The CfC further asserts that the BoG and Principal have taken time to fully explore Transformation prior to discussing it with parents. The CfC contains a detailed timeline of events detailing the transformation journey to date and outlines the range of meetings, consultations and engagements that have taken place with stakeholders and the wider community.
82. The school staff team has engaged with NICIE and EA Sectoral Support Officers in relation to learning about the Integrated ethos and the development of the school's Transformation Action Plan (TAP).
83. In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 3 December 2024 and 6 March 2025 to schools, which in the opinion of the EA might be affected by the proposal. A total of 26 local schools which might be impacted by the proposal were forwarded correspondence and invited to submit their responses to the EA by 14 January 2025 and 20 March 2025.
84. On 6 March 2025 the EA received additional information which updated the CfC for Killowen PS. The EA advised the school and the Department of this additional information and that any further comments they may wish to make should be forwarded to the EA not later than Thursday 20 March 2025. All previous responses already received were carried forward and the EA considered all written responses received during the consultation process. The proposal was submitted to the EA Strategic Planning and Policy Committee on the 1 April 2025, and it was agreed to publish the proposal week commencing 7 April 2025⁶.
85. One response had been received from affected schools, and one response was received from the CSSC. Details of the pre-consultation are included in the CfC at **Appendix B**.
86. Summary comments in support of the proposal note that the proposal will meet the demand for Integrated Education within the Killowen PS community; Killowen PS already welcomes children from different socio-economic backgrounds, children with different abilities and children from all faiths and none; and it will be important that the case for change articulates how the school will seek to attract pupils from different cultures and religious beliefs, including reasonable numbers of Protestant and Catholic children.

⁶ <https://www.eani.org.uk/sites/default/files/2025-05/Strategic%20Planning%20and%20Policy%20Committee%20Minutes%20-%201%20April%202025.pdf>

87. 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 (NI) 2016 (where appropriate) have been considered.

EA Comments

88. The EA's commentary regarding this DP is supportive of the proposal acknowledging its statutory duty to encourage, facilitate and support Integrated Education and states that *"Killowen 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"*. The EA also noted the limited available places at the integrated primary school in the area and that they will monitor the area for any potential impact the proposed transformation of Killowen PS may have on local schools.

Two-month Statutory Objection Period

89. The two-month statutory objection period on the proposal ran from 9 April 2025 until 9 June 2025. During the objection period, the Department received a total of 15 responses in relation to this DP, which includes responses from NICIE, the CSSC, and the IEF all of which were in support of the proposal. NICIE, CSSC and IEF comments have been detailed above. A summary of the other responses can be found in full at **Appendix H**. Key themes are expressed below; however, it must be noted that these are assertions/opinions from interested parties.

Summary of Responses

- Experienced firsthand the school's inclusive and nurturing environment;
- With the newly formed Causeway Academy set to operate as an Integrated school, it is both logical and timely that an Integrated primary school option be available in Coleraine;
- Coleraine has become increasingly diverse;
- An integrated ethos already permeates all aspects of school life in Killowen Primary School;
- Integration is a vital step forward in preparing our children for the future;
- Children should have the opportunity to be taught and cared for in an inclusive environment;
- The school has an excellent reputation locally and has a healthy enrolment;
- There is a demand for integrated education which is not being satisfied in the Coleraine area;
- Most of the children that attend Killowen, are past pupils of Playhouse or Kylemore Nursery Schools, both of these are integrated, so it would seem only

right that there is an option for them to carry on the Integrated pathway into primary education; and

- Integration is not only a positive step forward—it is a necessary one. Integrated Education offers a space where children from all religious, cultural, and social backgrounds can learn, play, and grow together.

Statutory & Other Considerations

90. Statutory and Other consideration pertaining to the assessment of this DP include:

- Article 64 - Statutory Duty to Encourage, Facilitate and Support the Development of Integrated Education
- Integrated Education Act 2022
- Rural Needs Act (2016)
- Article 44 of the Education and Libraries (NI) Order 1986 (effective and efficient use of public funds)
- Court of Appeal – Judgment on previous transformation proposals (JR335 and JR336)
- Housing development in the area
- Educational Impact
- VISION 2030 – A Strategy for Integrated Education 2025-2030
- Resource Implications

91. A full assessment of Statutory and Other considerations can be found at **Appendix M**.

Conclusion

92. 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.'*

93. 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.

94. 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.

95. There is clear evidence of demand for Integrated provision at both school and local area level, demonstrated by the strong parental ballot and with children leaving Coleraine to study at an Integrated school in Portrush. The proposal would address this gap and support an integrated pathway through to post-primary education in Coleraine. In the wider council area, however, there is undersubscription at existing Integrated primary provision.
96. The Act requires Integrated education to bring together pupils from different religious and cultural backgrounds, different socio-economic circumstances, and different abilities within a school that actively promotes diversity, respect and understanding.
97. The evidence demonstrates that the school enrolls pupils from a range of backgrounds, including newcomer pupils from different nationalities and ethnicities, although the Department notes that the number of newcomer pupils is not as high relative to neighbouring schools as claimed in the CfC. Nevertheless, the presence of newcomer pupils, together with the school's Shared Education partnerships and stated commitment to equality and inclusion, indicates that it is open and welcoming to children from different cultural and religious backgrounds.
98. The school also demonstrates strong evidence in relation to socio-economic and educational diversity. Free School Meal Entitlement has averaged almost 47% over the past five years, significantly above the Northern Ireland average, indicating that the school serves a substantial proportion of pupils experiencing socio-economic disadvantage while providing a range of support programmes for pupils and families.
99. In terms of ability, the school has a significant and growing number of pupils with Special Educational Needs, supported through staff training, nurture provision, differentiated teaching approaches and the recent establishment of Specialist Provision classrooms. Taken together, the school's pupil profile, inclusive practices, family support initiatives, partnerships with other schools, and commitment to meeting diverse educational needs provide strong evidence that it is educating children from different socio-economic backgrounds and abilities in line with the principles of the Integrated Education Act.
100. In addition, the school is operating above the SSP enrolment threshold, with stable admissions and strong community links, indicating that transformation would be sustainable and would not adversely impact the wider school estate.
101. The Department's Integrated Education (IE) Team's view is that the proposal is broadly aligned in principle with the Integrated Education Act, it demonstrates a clear

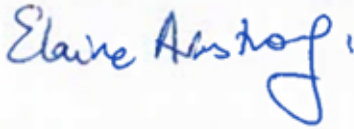
intention to transform to integrated status and to adopt the associated ethos. It provides evidence of current diversity within the school and sets out actions to further increase diversity across religious, socio-economic and ability dimensions. The school's existing religious balance does not currently satisfy the requirement for a reasonable Catholic-Protestant balance, with Catholic pupils representing only 5.2% of enrolment. However, the school serves a locality with a substantially more balanced community profile and there is evidence of parental demand for integrated provision. Achievement of a 10% Catholic threshold within one year is plausible but not assured and would depend upon a significant change in admission patterns following transformation. The absence of quantified projections or targets for achieving a reasonable mix 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. In particular, there is limited assurance on how "reasonable numbers" of Catholic and Protestant pupils will be achieved and sustained. IE Team's view is 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.

102. Overall, the evidence set out above shows that there is demand for Integrated education in the school and immediate area demonstrated via the successful ballot and pupils from the Coleraine area opting to attend other local integrated schools. There is, however, available capacity in the alternative integrated schools with undersubscription further demonstrated by the Integrated Education Demand report evidencing undersubscription in primary schools in the wider Causeway Coast and Glens LGD. The school has already met the requirements of the Act in relation to those of different cultures, those who are experiencing socio-economic and those of different abilities.
103. It has also demonstrated that it has the ability to meet the reasonable numbers requirements at Year 1 in the year after transformation, as it would have met it in both 2024/25 and 2025/26. There is, however, a low number of pupils from a Catholic background enrolled in the school, despite this increasing recently. The demographic breakdown of the local area indicates that there is potential for the school to draw from the minority community and for the representation from this community to improve. However, there is an absence of sufficient evidence, such as EoI forms, to set out how an increase in the number of pupils from the minority community over the next seven years can be achieved to reach reasonable numbers, with an aspiration for the relative proportions of the two religions to be similar.

RECOMMENDATION

104. It is recommended that you:-

- I. consider the evidence set out in this submission and appendices to inform your decision on DP 745; and
- II. If content, agree this submission (with any appropriate redactions) and the DP 745 decision can be published on the Department's website once the Board of Governors of Killowen PS and the Education Authority have been informed of the decision.



Elaine Armstrong

☎ 028 9127 9711 (Ext 59711)

elaine.armstrong@education-ni.gov.uk

CC

David Malcolm

Sharon Smyth

Heather Cousins

Faustina Graham

Paul Brush

Suzanne Kingon

Andrew Scott

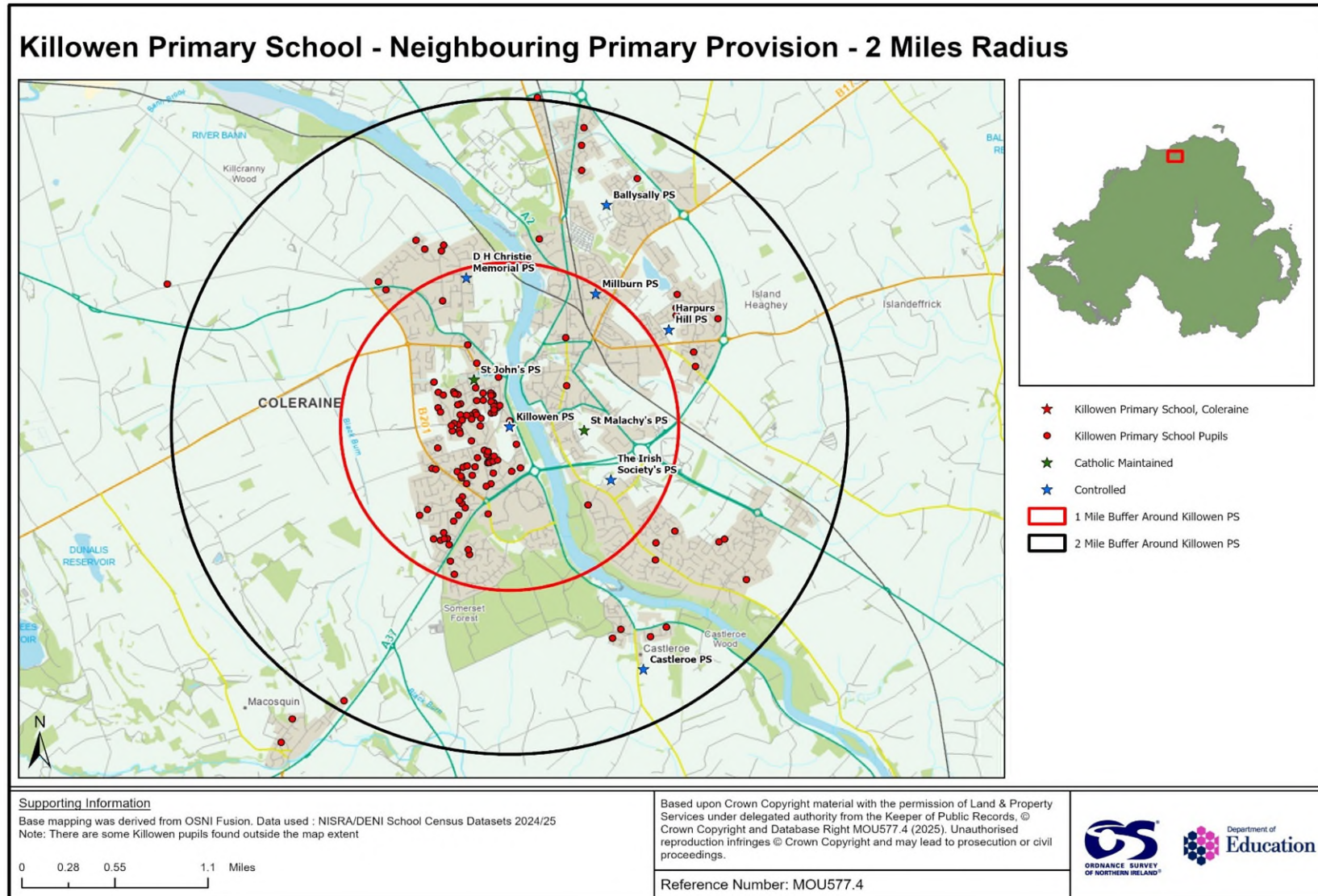
Scott Harbinson

Clare Foley

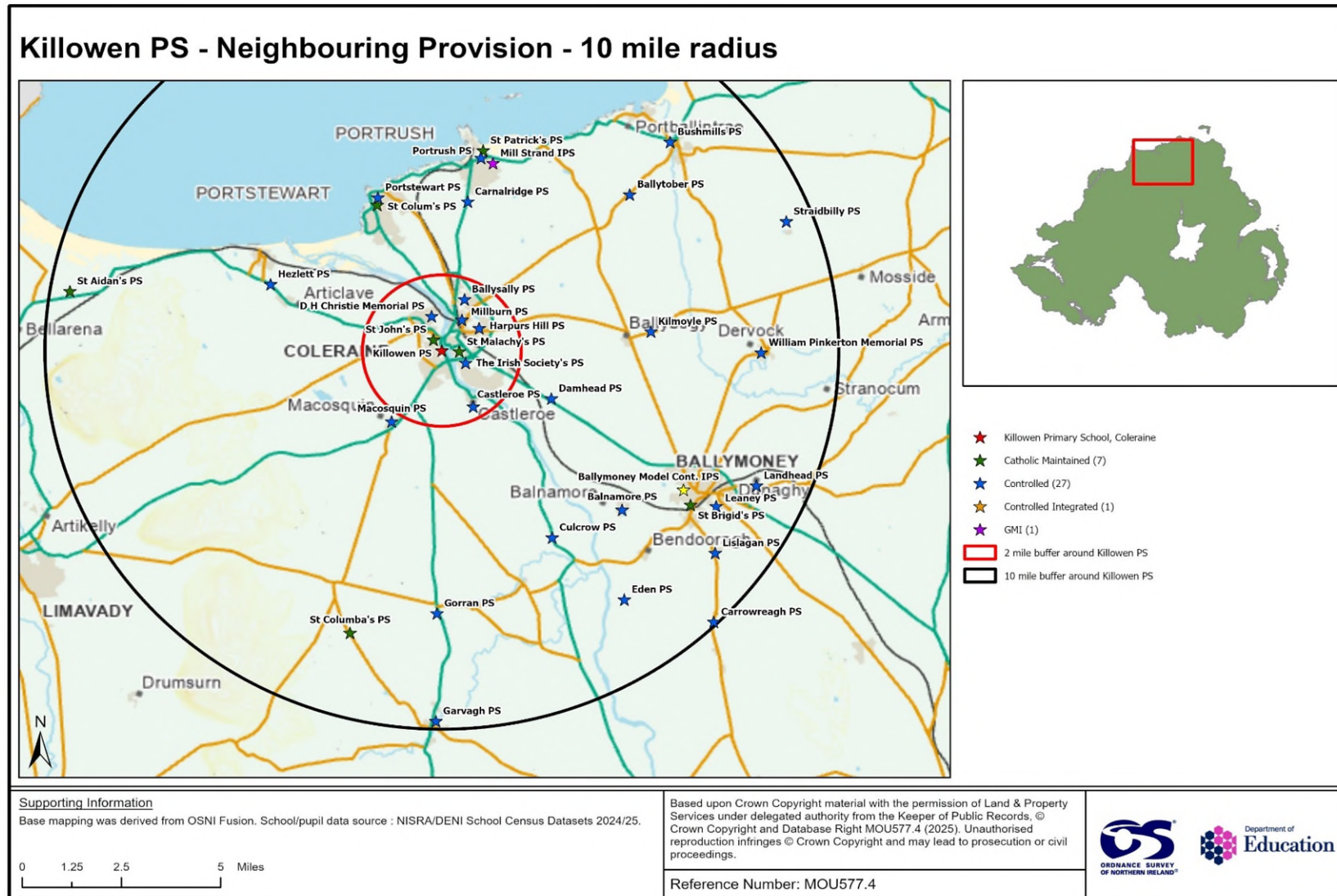
APPT Correspondence

Press Office

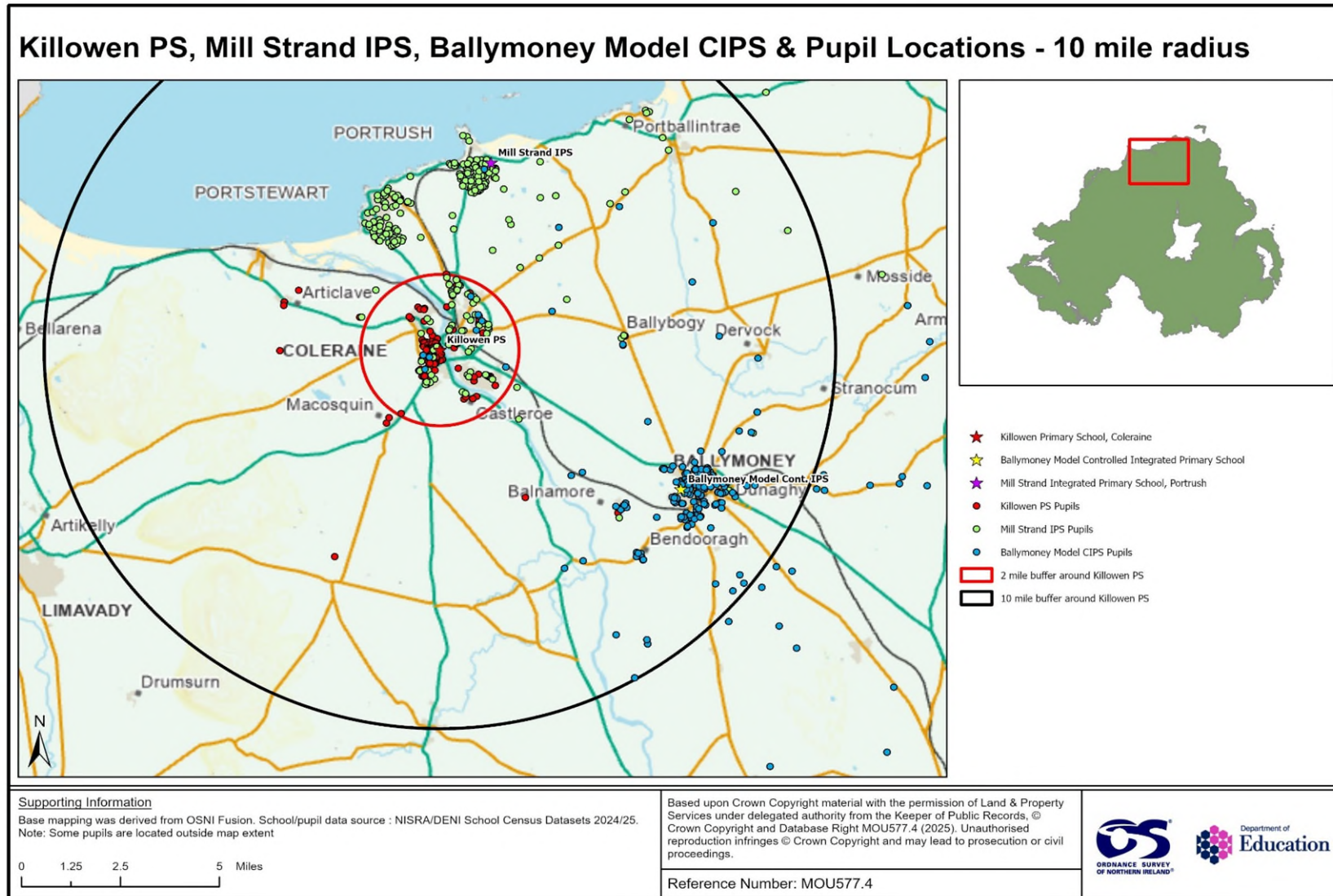
Map 1: Killowen Primary School pupil locations and Neighbouring Primary Provision (2 mile mapping radius)



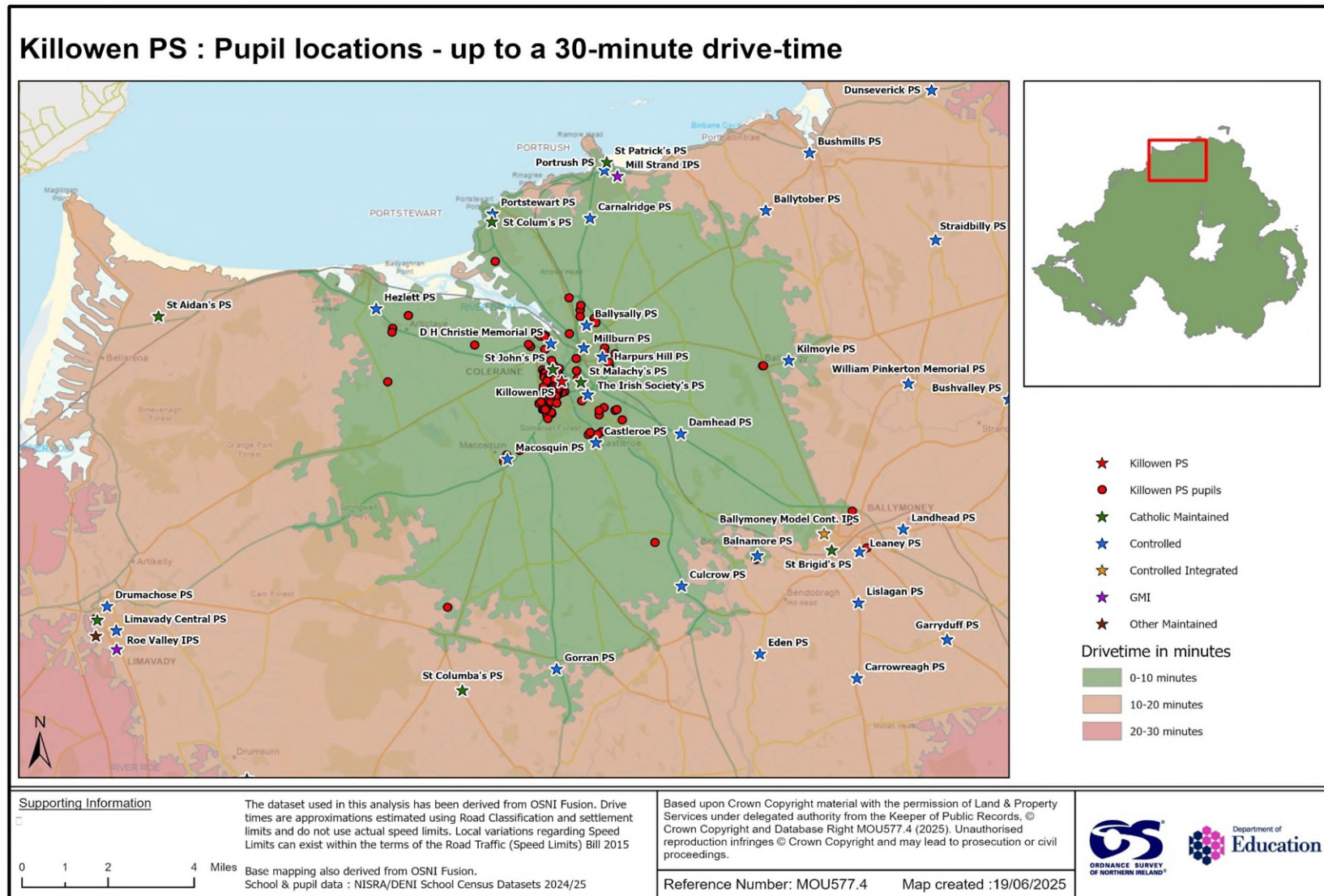
Map 2 Killowen Primary School - Neighbouring Primary Provision – 10 mile Radius



Map 3: Killowen Primary School and Neighbouring Integrated Primary Provision – 10 mile radius



Map 4 – Killowen PS – Drive- time map



Map 5 Killowen PS – Pupil locations immediate area

