

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	609	
School(s)	Drumsallen Primary School	
Proposal	<p><i>Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.</i></p> <p>Proposal has been modified to: -</p> <p><i>Drumsallen Primary School will discontinue with effect from 31 <u>August 2021</u>, and no later.</i></p>	
Minister's Decision	Approve	
Date of Decision	8 July 2020	
Minister's Comments	<p>Approve modified DP 609 for closure with effect from no later than 31 August 2021.</p> <p>It is critical that the EA ensure children and parents are supported in their transition to other sustainable local schools and every effort made to minimise disruption to the children's education and welfare and care and attention given to teaching and non-teaching staff.</p>	
Additional notes		
Information redacted		
	Key	Details
	[redacted]	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: EAMONN BRODERICK
Area Planning Policy Team (South West Region)

(Cleared by Janis Scallon 6 July 2020)

Date: 7 July 2020

To: PETER WEIR MLA
Minister for Education

Copy distribution below

**DEVELOPMENT PROPOSAL (DP) 609 – TO DISCONTINUE PROVISION AT
DRUMSALLEN PRIMARY SCHOOL (PS), ARMAGH**

Issue: To decide on DP 609:
Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.

Timescale: Routine - The Chairperson of the Board of Governors of Drumsallen PS had requested an urgent decision, no later than the end of April 2020, however, due to the circumstances surrounding Covid-19 this was not possible.

Financial / Resource Implications: Capital:
The Case for Change states that some additional minor works may be required at other schools.

Resource:
Teaching and non-teaching staff are afforded employment protection under their respective School Re-organisation Agreements and are eligible for redeployment under transfer redundancy procedures. Staff unsuccessful in gaining redeployment or employment will be treated as supernumerary and a Centre cost.

A deficit held by a school will be met by Education Authority Centre funds. At 31 March 2020, Drumsallen PS held a provisional deficit of -£155,710.

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

Statutory Duty Implications:

The Rural Needs Act (NI) 2016

Article 44 of the Education and Libraries (NI) Order 1986

Section 75 of the Northern Ireland Act 1998

Presentational Issues:

**It is likely that 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 with the Press Office)**

Recommendation:

It is recommended that you:

- (i) Approve the modified DP 609 that:**

Drumsallen Primary School will discontinue with effect from 31 August 2021, and no later.

- (ii) Agree that this submission (with appropriate redactions) can be published on the Department's website once the Education Authority (EA) and the school have been notified of your decision.**

- (iii) In making your decision, you may wish to state that it is important that the EA should ensure children and their parents are supported through the transition to other sustainable schools in the area. Every effort should be made to minimise the disruption to children's educational experiences and support, care and attention should be given to affected teaching and non-teaching staff who are impacted by this closure.**

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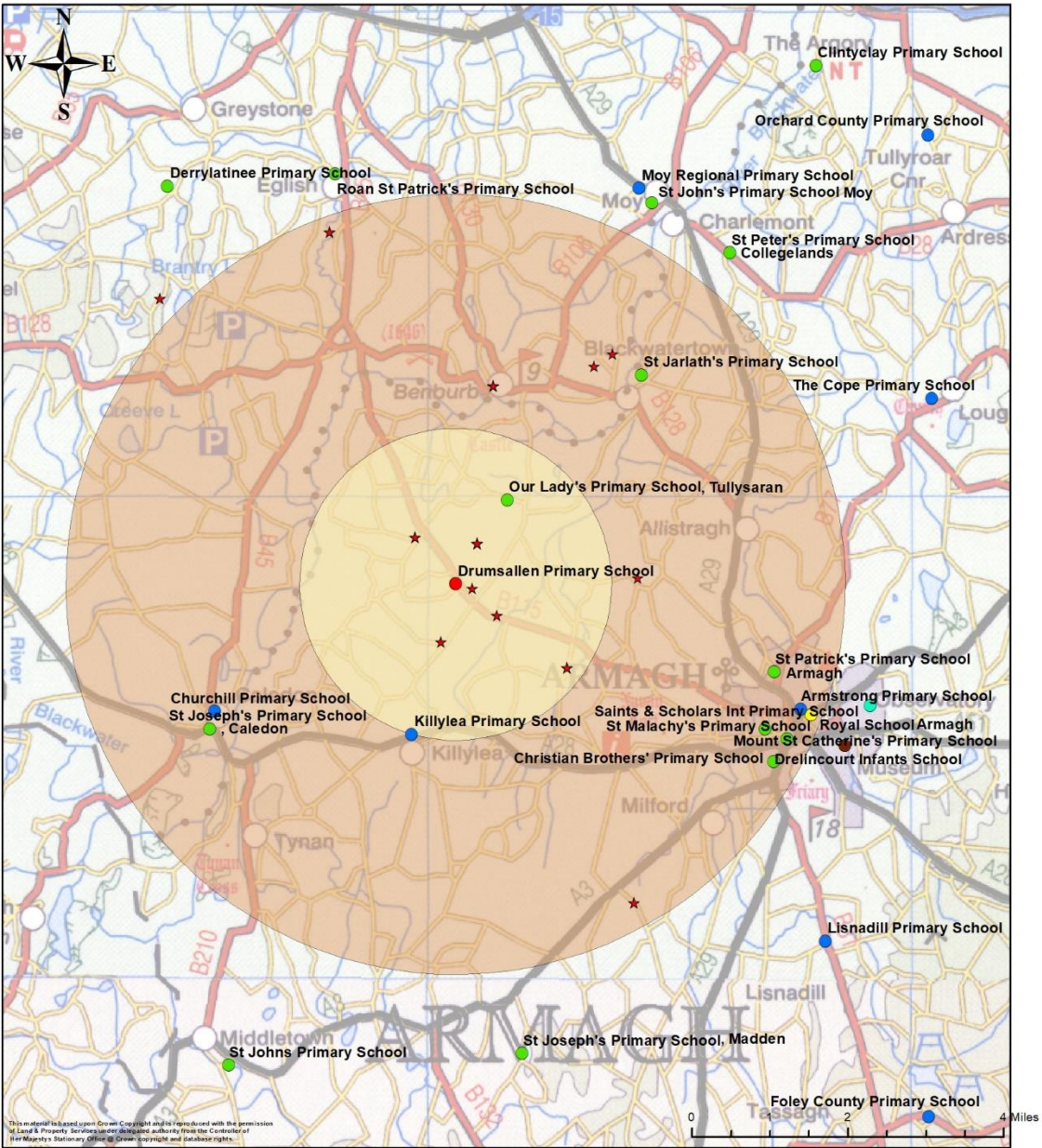
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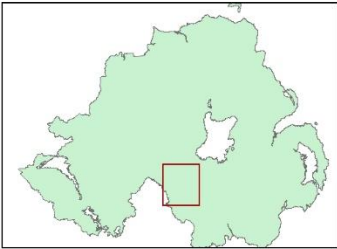
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MAP 1

Drumsallen Primary School - Alternative Provision and Pupil Locations

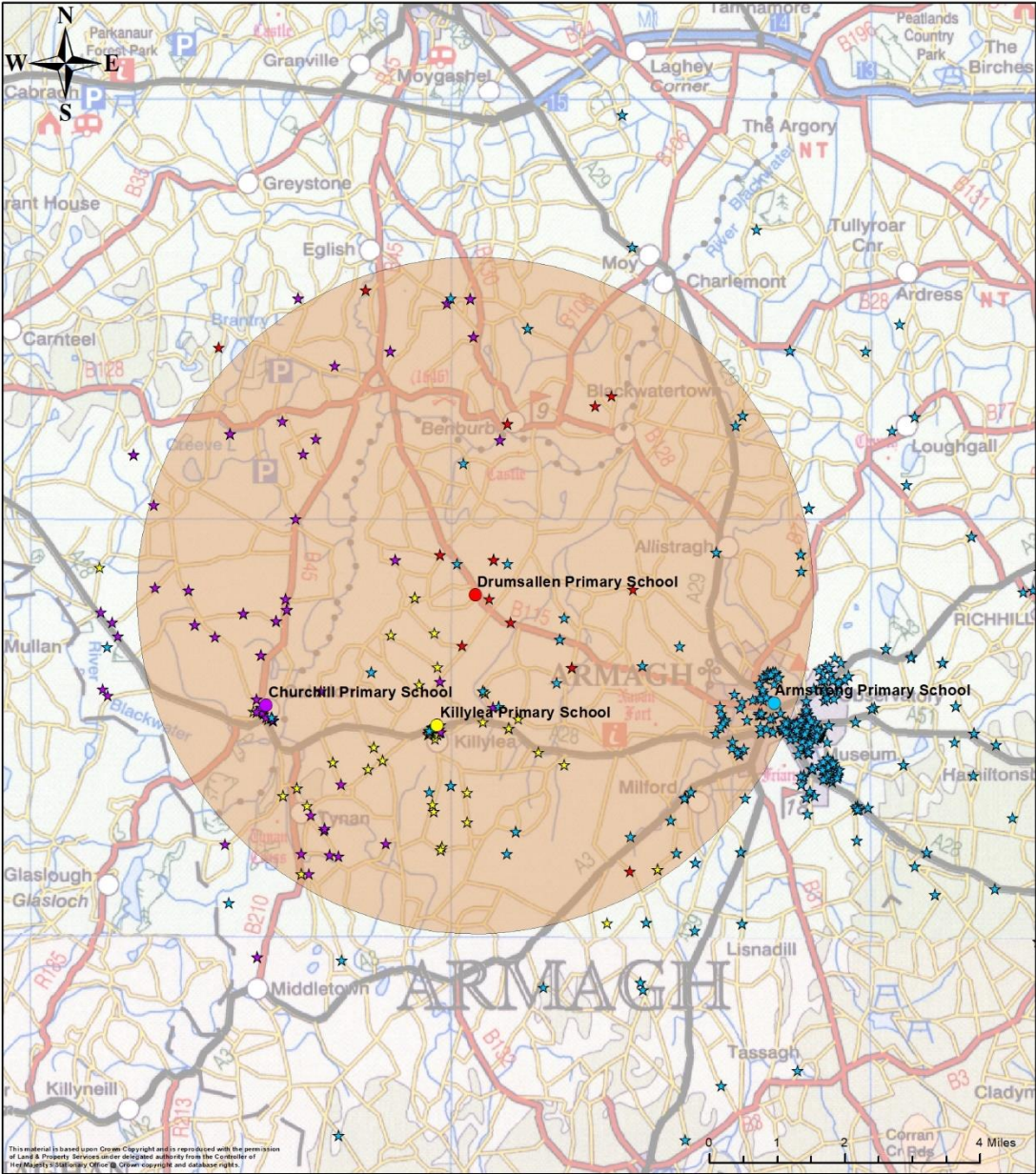


- Drumsallen PS
- Controlled
- Voluntary
- RC Maintained
- Other Maintained
- Controlled Integrated
- GMI
- ★ Drumsallen PS pupils
- 2 Mile Buffer of Drumsallen PS
- 5 Mile Buffer of Drumsallen PS



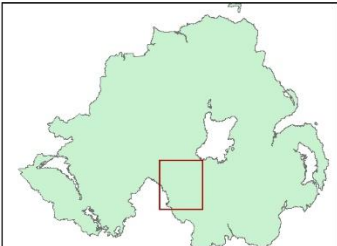
MAP 2

Drumsallen Primary School - Alternative Controlled Provision and Pupil Locations



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- Drumsallen PS
- Armstrong PS
- Churchill PS
- Killylea PS
- ★ Drumsallen PS pupils
- ★ Armstrong PS pupils
- ★ Churchill PS pupils
- ★ Killylea PS pupils
- 5 Mile Buffer of Drumsallen PS



INTRODUCTION

1. On 23 January 2020, the Education Authority (EA) published Development Proposal (DP) 609 proposing that:

'Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.'

2. The statutory two-month objection period for this proposal commenced on the date of publication and ended on 23 March 2020. Due to the outbreak of the Covid-19 (Coronavirus) pandemic and with staff deployed on associated activities, this has impacted the timeframe for the development of this submission for DP 609.
3. A copy of the published DP and the supporting Case for Change (CfC) are reproduced at Appendices A and B respectively.

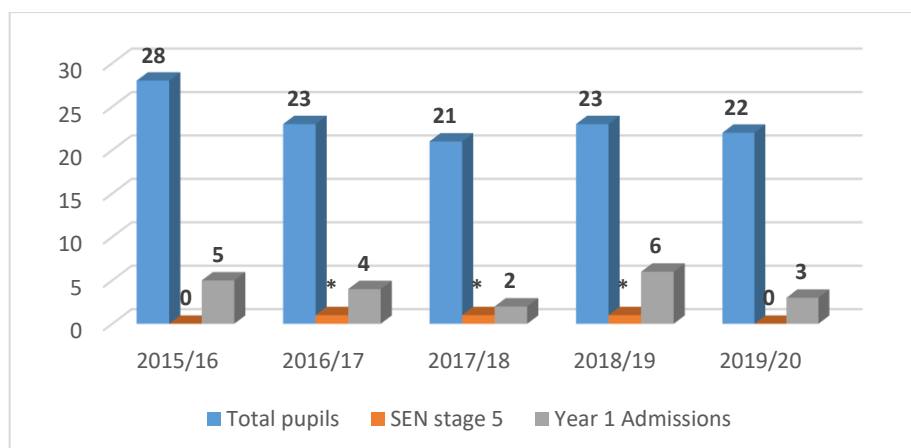
BACKGROUND

4. Drumsallen Primary School (PS) is a co-educational Controlled primary school situated between Killylea and Benburb in County Armagh as illustrated on Map 1.

Admissions and Enrolment

5. Drumsallen PS currently has approved admissions and enrolment numbers of 13 and 93 respectively. In 2019/20, there are 22 pupils enrolled at the school including three Year 1 pupils. There are 71 available places that children could apply for through the competitive admissions process.
6. Chart 1 illustrates the pattern of historical admissions and enrolments at Drumsallen PS. The school's enrolment has declined since 2015/16 from 28 pupils to 22 pupils in 2019/20. The school has admitted six or less pupils to Year 1 in each of the last five years which is significantly below its approved admissions number of 13.

Chart 1 – Drumsallen PS – Historical Admissions and Enrolments



7. The school's overall enrolment of 22 in 2019/20 is also significantly below the Sustainable Schools Policy (SSP) minimum recommended enrolment of 105 for a sustainable rural primary school.
8. In 2019/20, 22.7% of the school's enrolment (five pupils) are entitled to Free School Meals (FSM).

AREA CONTEXT

9. On the Northern Ireland Multiple Deprivation Measure 2017, the Ballymartrim Super Output Area, in which Drumsallen PS is situated, is placed 498 out of 890 (1 being most deprived and 890 least deprived).

EA's "Providing Pathways": Strategic Area Plan for School Provision 2017-2020

10. The EA's '*Providing Pathways - Strategic Area Plan 2017-2020*' (Area Plan) identifies a key issue emerging from analysis of current provision in the Armagh, Banbridge and Craigavon Local Government District (LGD) area relevant to Drumsallen PS, i.e, '*Schools facing sustainability challenges*'.
11. The EA's Area Plan includes population projections provided by the NI Statistics and Research Agency (NISRA) for the Armagh, Banbridge and Craigavon Local Government District (LGD) area. The population of 0-15 year olds is projected to increase by 9.6% by 2024.
12. Drumsallen PS featured in the EA's Annual Action Plan April 2017-March 2018 and was carried forward to the 2019-21 extended Action Plan with the following action - "*Managing authority to consult on options for future provision of Drumsallen PS by January 2020*".
13. The CfC reports that the EA held discussions with the Board of Governors (BoGs) of Drumsallen PS on the school's current position and sustainable options for the school. The EA considered a number of options including doing nothing; the potential for shared education; a federation involving small schools combining to form a single school and amalgamation. However these options were discounted mainly because they would not result in a sustainable solution.
14. The CfC states that the EA, in consideration of all the options, '*recommends that Drumsallen discontinues with effect from 31 August 2020*'.

Alternative Primary Provision

15. Map 1 illustrates all alternative primary provision in the area within a five mile mapping radius, although distances by road may exceed this, as well as locations of pupils that are enrolled at Drumsallen PS. In addition, a snapshot of total provision in the area detailing the admissions and enrolment data and the latest Education and Training Inspectorate (ETI) inspection assessment at each school, is provided in Table 1.

Alternative Controlled Provision

16. There are three alternative Controlled primary schools within a five mile mapping radius of Drumsallen PS, as illustrated on Map 2. The closest provision is at Killylea PS, 2.7 miles away from Drumsallen PS. Table 1 shows that the enrolments of both Killylea PS and Churchill PS, the next nearest at 5.1 miles away, have been below the SSP recommended minimum enrolment of 105 for a sustainable rural primary school in the last three years. In 2019/20, Killylea PS has 65 pupils enrolled and Churchill PS has 86 pupils enrolled.
17. Killylea PS currently operates three composite classes, two of which cater for two year groups, in line with the SSP, however, one class currently caters for three year groups, P5-P7. If this school did attract additional pupils, however, it may be possible for classes to be reconfigured in line with the SSP. Neither Killylea PS nor Churchill PS feature in the EA's extended Annual Action Plan April 2019-March 2021.
18. The enrolment at Armstrong PS, also just over five miles away, has been significantly above the threshold and in 2019/20, the school has 522 pupils enrolled, which includes 40 pupils with a Statement of Special Educational Needs (SEN), significantly exceeding its approved enrolment number of 443.
19. At Year 1, there are 101 approved places across the four Controlled primary schools, with a total of 80 first preference applications received for 2019/20. At the conclusion of the primary schools admissions process for 2020/21, 91 first preference applications were received.
20. As included in Table 1, the quality of education provided by these alternative Controlled primary schools has been assessed as of a high or very high standard by the ETI.
21. As evidenced in Table 1, there are a total of 28 available places in these three alternative Controlled primary schools in 2019/20, all in Killylea PS.

Alternative Catholic Maintained Provision

22. There are seven Catholic Maintained primary schools within a five mile mapping radius of Drumsallen PS as illustrated on Map 1. Four of these schools are based in Armagh. The enrolments at six of the schools are well above the SSP recommended minimum enrolment threshold for a sustainable rural primary school, however, St Joseph's PS, Caledon has only 30 pupils enrolled in 2019/20, significantly below the SSP enrolment threshold. This school features in the EA's extended Action Plan April 2019- March 2021 with the key issue to '*address school provision where sustainability is an issue*' and with an associated action for the '*managing authority to consult on options for future provision of St Joseph's PS by March 2021*'. In 2019/20 there are a total of 433 available places in these schools with the highest number of 291 in Mount St Catherine's PS.
23. At Year 1, there are 295 approved places in these schools with 187 first preference applications received in 2019/20 and 203 in 2020/21.

24. The quality of education provided by these schools has been assessed as of a high or very high standard by the ETI. .

Table 1: Drumsallen Primary School – Alternative Primary Provision

Ref No	School	Postcode	Distance in Miles by Road	2020/21 Approved Enrolment	2017/18 Actual Enrolment (Includes SEN)	2018/19 Actual Enrolment (Includes SEN)	2019/20 Actual Enrolment (Includes SEN)	2019/20 Supernumerary	2019/20 Available Places	2019/20 Actual Admissions (includes SEN)	2020/21 Approved Admission Numbers	2020/21 Total First Preference Applications	2020/21 Over/Under Subscribed at First Preference	ETI reports publication date / assessment
Controlled Sector														
501-1117	Drumsallen PS	BT60 4PA		93	21	23	22	0	71	*	13	0	U - 13	March 2017 - ASOS Feb 2011 - Very good
501-1132	Killylea PS	BT60 4LN	2.7	92	59	65	65	*	28	11	13	17	O - 4	May 2019 - Capacity to identify & bring about improvement
501-2538	Churchill PS	BT68 4UY	5.1	82	83	88	86	*	0	8	12	18	O - 6	Oct 2012 - Very good Jan 2019 - ASOS – The school is a high priority for inspection with no further notice
501-1115	Armstrong PS	BT61 9DF	5.1	443	528	545	522	40	0	66	63	56	U - 7	Jan 2017 - High level of capacity for sustained improvement
Sub total				710	691	721	695	42	99	88	101	91		
Catholic Maintained Sector														
503-6598	Our Lady's PS, Tullysaran	BT71 7NJ	2	175	176	183	177	*	0	22	25	22	U - 3	Nov 2010 - Very good Feb 20202 - ASOS
503-6121*	St Jarlath's PS	BT71 7HH	4.5	205	179	178	171	5	39	26	29	32	O - 3	Dec 2018 - ASOS Sept 2015 - High level of capacity for sustained improvement
503-1126	Mt St Catherine's PS	BT60 4BR	4.8	481	240	224	196	6	291	21	60	14	U - 46	Nov 2018 - ASOS Jan 2011 - Very good
503-1133	St Malachy's PS, Armagh	BT61 7EG	5	203	204	200	197	6	9	26	29	31	O - 2	April 2016 - High level of capacity for sustained improvement June 2019 - ASOS
503-6463	St Joseph's PS, Caledon	BT68 4UF	5.1	87	36	33	30	*	59	*	12	5	U - 7	Oct 2018 - ASOS Sept 2015 - High level of capacity for sustained improvement
503-1183	St Patrick's PS, Armagh	BT61 7NN	5.4	505	509	508	479	9	35	48	72	58	U - 14	Sept 2017 - ASOS May 2010 - Good
503-1110**	Christian Brothers PS	BT60 4AB	5.7	476	515	528	542	11	0	81	68	41	U - 27	Dec 2019 - ASOS Feb 2013 - Very good
Sub total				2132	1859	1854	1792	43	433	226	295	203		
Grand Total				2842	2550	2575	2487	85	532	314	396	294		

* Development Proposal 284 Approved (with modification from 210 to 205) in 2013 to increase admissions & enrolment

** Development Proposal 318 Approved (to 476) in 2015 to increase admissions & enrolment

SPECIAL CONSIDERATIONS

Rural Needs Act (NI) 2016

25. Rural proofing has been a requirement for all Government Departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016 the commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 ('The Act'). The Act places a duty on Government Departments to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. It came into operation for Government Departments and District Councils on 1 June 2017 and applied to public authorities from 1 June 2018.
26. Drumsallen PS is located between Killylea and Benburb in County Armagh and is defined as rural under the SSP.

Section 75 of the Northern Ireland Act 1998

27. Section 75 of the Northern Ireland Act 1998 ('The Act') requires public authorities designated for the purposes of The Act to comply with two statutory duties. The first duty is the equality of opportunity duty, which requires public authorities in carrying out their functions relating to Northern Ireland to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without. The second duty requires that public authorities have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group.

Effective and Efficient Use of Public Funds

28. The Department of Education (the Department) must also be mindful of its duty under Article 44 of the Education and Libraries (NI) Order 1986 and under Managing Public Money to ensure effective and efficient use of public funds.

CASE FOR CHANGE (CfC)

29. The CfC sets out the EA's rationale for the proposed closure of Drumsallen PS as follows:-
 - Drumsallen PS has always been a small primary school with an enrolment over the past number of years not exceeding 40 pupils.
 - The school was identified in the Annual Action Plan 2018/19 in which sustainability was an issue.

- The school is experiencing a reduction in pupil numbers thereby increasing pressure on the financial resources of the school and also on the teaching staff.

30. The CfC is reproduced in full at Appendix B.

STATUTORY DP PROCESSES

Pre-publication Consultation

31. In accordance with Article 14 of the Education and Libraries (NI) Order 1986, the EA has confirmed that the BoGs, teachers and parents of Drumsallen PS were consulted on 12 September 2019. A total of 13 responses were received. A summary of the emerging themes included in the responses received is included in the CfC. Nine responses agreed with the proposal and this included one response made on behalf of all eight staff members. The BoGs was also in agreement, as were six parents/guardians who responded and one local school. Only two responses from parents/guardians were not in agreement.
32. A copy of the proposal was sent to 16 local schools on 13 September 2019 which, in the opinion of the EA, might be affected by the proposal and two responses were received from Killylea PS and Churchill PS. One school agreed with the proposal and one school abstained from agreeing or disagreeing.
33. The CfC at Appendix B sets out the comments from Killylea PS and Churchill PS.

EA's Comments

34. The EA, as the proposer, supports the proposal to discontinue Drumsallen PS. The EA states in the CfC that during consultations with governors, staff and parents/guardians, recurring themes emerged and comments provided by the EA on each theme are as follows:-
- *The decision made as timely as possible*
The EA had planned to progress with pre-publication consultation in May 2019, however, at the expressed wish of the BoGs the EA agreed to undertake the pre-publication consultation in September 2019. The BoGs was advised of and acknowledged the tight timescale.
 - *Availability of places in local schools*
The EA will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department to endeavour to ensure that pupils affected by the proposal be accommodated, where possible and within current guidance/policies.

- *Transport concerns*
The EA's transport policy would be applied to pupils displaced with transport provided for pupils with entitlement.
- *Children with Special Educational Needs*
The support which the EA provides for the pupils will continue regardless of the school they attend.
- *Section 75 - Comments from Questionnaires*
The closure of Drumsallen PS will negatively affect primary age pupils and further reduce parental choice in the Controlled school sector, thus negatively impacting on the Protestant community.

Two Month Statutory Objection Period

35. During the two-month statutory objection period which ended on 23 March 2020, the Department received eight responses. One from the BoGs of Drumsallen PS, one from the City of Armagh High School (HS) and one from the Controlled Schools Support Council (CSSC). Five pro-forma type responses were received in objection to the proposal from parents, parents of potential future pupils and grandparents of pupils at the school.

Drumsallen PS

36. Correspondence was received from the Chairperson of the BoGs of Drumsallen PS on 5 February 2020 wishing to reiterate the views expressed during the EA's pre-publication statutory consultation on the proposal contained within the CfC.
37. The Chairperson requested a prompt decision on the proposal, no later than the end of April 2020, due to the stress caused by uncertainty on parents, pupils and staff.

City of Armagh High School

38. The Chair of the BoGs of City of Armagh HS wrote on 23 January 2020 to acknowledge the proposal to discontinue provision for pupils at Drumsallen PS and to seek assurances that there will be alternative suitable Controlled provision for pupils at the school.

CSSC

39. The CSSC acknowledges the low enrolment at the school and the challenges this presents for the BoGs and staff but requests '*that the educational experiences of pupils and the welfare of pupils and staff are paramount in the decision making process*'.

40. The CSSC also seeks assurances around the placement of pupils and that the teaching and non-teaching staff are supported in the process of redeployment and/or voluntary redundancy.

Objections

41. The five objections received in relation to the proposal make a number of key points as follows:
- The census of live births for the area does not take into consideration the number of children who have moved to the area after birth.
 - Drumsallen PS offers an excellent quality of pastoral care, which should not be underestimated when considering the long-term financial cost to the government.
 - The standard of education in Drumsallen PS is excellent. The smaller classes offer great potential for one-to-one attention to all the children.
 - Drumsallen PS also has the largest approved enrolment numbers of 93 and has the capacity to hold more children than either Killylea PS & Churchill PS.
 - To send children from a rural background to a larger city school, such as the Armstrong PS in Armagh City would not only be detrimental to their long-term mental health, it would destroy the strong bond rural schools have with the local community.
 - The figure of 105 pupils in rural schools is not realistic in Northern Ireland due to its widespread population.
42. Responses are reproduced in full at Appendix C.

SUSTAINABILITY ASSESSMENT

43. The Department's SSP sets out six criteria supported by quantitative and qualitative indicators which provide the framework for consideration of a school's longer-term sustainability. The primary objective of the policy is to ensure that all children and young people receive a high quality education in schools that are educationally and financially viable in the longer term. The following is an assessment of Drumsallen PS against the six sustainability criteria and their associated indicators.

Criterion 1: Quality Educational Experience

44. The ETI carried out an inspection of Drumsallen PS in February 2011 and although this evidence is now dated, the quality of education provided by the school was assessed as 'very good' The ETI further added that the school was meeting very effectively the educational and pastoral needs of the children; and has demonstrated its capacity for sustained self-improvement.
45. The ETI, however, also reported that *'it will be important that the employing authority, school Board of Governors (governors) and the staff plan for, and manage, issues related to the sustainability of the school provision and*

school budget, in order to address the current and future needs of the children and the staff’.

46. In March 2017, the ETI attempted to carry out a monitoring inspection of Drumsallen PS but this was hampered by industrial action. The ETI reported that they were unable to assure parents/carers, the wider community and stakeholders of the quality of education being provided for the children.

Special Educational Needs

47. In 2019/20 there are no pupils enrolled at Drumsallen PS with a Statement of SEN. There are # pupils at SEN stages 1-4. The ETI February 2011 report assessed the school’s provision for SEN as very good and states that *‘the children identified with special educational needs make very good progress in learning across the curriculum and almost all reach the standards of which they are capable by the end of Year 7’.*
48. The inspection report also states that *‘the children’s needs are identified at an early stage, comprehensive education plans are drawn up, a variety of programmes of support are implemented and the progress made by each child is monitored and reviewed regularly’.*

Teaching Staff

49. In 2018/19, Drumsallen PS had 2.17 full-time equivalent teachers. Unvalidated figures for 2019/20 show that this remains the same. The SSP recommends a minimum of four teachers at primary school level.

Pastoral Care

50. The ETI Inspection Report of February 2011 reported that *‘the quality of the arrangements for pastoral care is outstanding’* at Drumsallen PS. The ETI further adds that *‘this is evident through the strong inclusive and community ethos, the excellent working relationships at all levels and the extent to which the school informs and involves the parents in the life and work of the school’.* The report concludes that *‘the school is meeting very effectively the educational and pastoral needs of the children’.*
51. The objections received during the statutory two month objection period also commented on the excellent quality of pastoral care provided by the school.

Extra-Curricular Activities

52. The ETI Inspection Report of February 2011 states that Drumsallen PS *‘gives good attention to promoting healthy eating and physical activity, for example, through the provision of healthy breaks, regular physical activity sessions and a range of extra-curricular sporting activities’.* During the EA’s consultation with staff, the BoG and parents, one comment included that *‘all pupils at Drumsallen Primary School have ample opportunities to attend a full range of extra-curricular activities’.*

53. The school prospectus details that a wide range of sporting activities are provided including taking part in the Tri-county Sports Project for soccer and netball, Armagh Schools League and Tournament (hockey) and the Distance and Skills Award (swimming). Other activities in and out of school hours include cycling proficiency, film and animation, cookery, art and craft, Zumba, good news club, drama and choir.

Composite Classes

54. The October 2019 census statistics confirm that in 2019/20, Drumsallen PS was operating three composite classes (P1-P2, P3-P4 and P5-P7), as set out in Table 2. There were only six pupils in the P5-P7 composite class with no pupils in P6.

Table 2 – Drumsallen PS – Composite Classes in 2019/20

Year Group	P1	P2	P3	P4	P5	P6	P7
Pupils	3	6	3	4	5	0	1
Total	9		7		6		

55. The ETI, however, carried out a district visit to Drumsallen PS on 7 February 2020 and although they were unable to make classroom visits owing to industrial action, the Principal reported that there were only two composite classes in operation, P1-P3 in one class and P4- P7 in another.
56. The SSP states that there should be no more than two composite year groups in a single classroom at primary school level.

Physical Environment

57. In providing comments on the proposal, the ETI advised that the school building is almost ninety years old and requires a lot of maintenance.

Criterion 2: Stable Enrolment Trends

58. Drumsallen PS currently has an approved enrolment number of 93. Table 3 sets out the school's total enrolment for the last five years. It shows that historically the school has been undersubscribed. Enrolments have been declining from 28 in 2014/15 to 22 in 2019/20. The school's enrolment is substantially below the recommended minimum enrolment of 105 for a sustainable rural primary school, as set out in the SSP.

Table 3: Drumsallen PS –Historical Enrolments (including Pupils with a Statement of SEN)

Year	2015/16	2016/17	2017/18	2018/19	2019/20
Enrolment	28	23	21	23	22

59. Table 4 below sets out Drumsallen PS' P1 intake from 2015/16 to 2019/20 and shows that the school has admitted six or less pupils into Year 1 in each of the last five years, with only three pupils admitted in 2019/20. Admissions are therefore consistently below the school's approved admissions number of 13.

Table 4: Drumsallen PS – Historical Admissions (including Pupils with a Statement of SEN)

Year	2015/16	2016/17	2017/18	2018/19	2019/20
Admissions	5	4	2	6	3

60. First preferences applications to Drumsallen PS are set out in Table 5. This demonstrates the very low level of applications for the primary school.

Table 5: Drumsallen PS – First and Total Preferences

	15/16	16/17	17/18	18/19	19/20
1st preference	0	1	0	0	3
Total preferences	0	1	0	0	3
Accepted	0	1	0	0	3
Reception 1st	3	2	6	0	1
Reception total	3	2	6	0	1
Reception acc	3	2	6	0	1

61. As indicated in Table 5, the school operates a Reception class and the table shows that more applications are being received for the school's reception class than for the main school. Although an application was received for the reception class in 2019/20, census data confirm that there were no pupils enrolled in reception.

Criterion 3: Sound Financial Position

62. Drumsallen PS' provisional deficit position as at 31 March 2020 is -£155,710. The school's deficit in the previous year, up to 31 March 2019 was -£99,034.
63. The school received a total delegated budget of £138,189 in the 2020/21 financial year for **22**¹ FTE pupils, which generates a per capita of £6,281. The average for all primary schools is £3,213.
64. The school received £47,726 for Small Schools Support funding, which represents 100% of the maximum funding for this factor, within the Nursery & Primary funding stream.
65. The school also received £16,420 in respect of Primary Principals' Release Time.

66. The CfC states that Drumsallen PS is operating with a budget deficit and asserts that this deficit is projected to increase and it is expected that with the small pupil numbers the situation will exacerbate further year on year.

Criterion 4: Strong Leadership and Management

67. The ETI Inspection Report of February 2011 assessed the quality of leadership and management as 'very good'. The report states that the Acting Principal provides very good leadership and that the co-ordinators provide valuable support and guidance to the staff and have identified appropriate developmental needs regarding their respective areas of responsibility.
68. The report further adds that the whole school self-evaluation and school development planning processes are good.

Criterion 5: Accessibility

69. The CfC states that the majority of pupils attending Drumsallen PS are from the local area. Map 2 confirms that virtually all of the pupils live within a five mile radius of the school. The school is therefore accessible to its pupils within the 30 minutes travel time as stipulated in the SSP.
70. There are three alternative Controlled primary schools within approximately five miles distance by road, ie, Killylea PS (2.7 miles); Churchill PS and Armstrong PS (5.1 miles).
71. Map 2 shows that many pupils are prepared to travel further and are bypassing Drumsallen PS to attend the alternative Controlled primary schools, while some pupils who attend Drumsallen PS are also bypassing other schools to attend.

Criterion 6: Strong Links with the Community

72. The CfC states that Drumsallen PS has strong links with the community.
73. The ETI inspection report of February 2011 states that there is a strong inclusive and community ethos and excellent working relationships at all levels and comments on the extent to which the school informs and involves the parents in the life and work of the school.

¹ The school's funding allocation is based on the previous year's census data (e.g. the October 2019 census data was used to determine the 2020-21 CFF allocation). **The census data on the Schools+ database relates to an academic year, as opposed to the financial year.** In addition, differences between funded pupils and total pupils within the census count may occur for a number of reasons, including, but not limited to, zero rated pupils, some reception pupils, and over age pupils (paragraph 7 of Annex B to the Common Funding Scheme refers).

Sustainability Summary

74. Although the quality of education at Drumsallen PS was assessed as 'very good' by the ETI in February 2011. The school operates two composite classes for all its year groups. The number of teachers employed is also below the recommended four teachers for a primary school.
75. The school's enrolment is significantly below the SSP's recommended minimum threshold of 105 for a sustainable rural primary school with enrolment numbers not rising beyond 28 in the last five years.
76. Drumsallen PS is operating in a financial deficit position which is significantly in excess of the +/- 5% range for budget surpluses/deficits stipulated by the Department and the CfC predicts that the deficit is set to continue to increase.
77. Leadership and management at the school has been assessed as very good and the school has strong links with the community. The school is accessible to its pupils, however, there are other alternative primary schools within a five mile radius that the pupils at Drumsallen PS could attend if this DP is approved.
78. In conclusion, Drumsallen PS has serious deficiencies when assessed against the SSP's criteria, particularly in relation to Quality Educational Experience, Stable Enrolment Trends and Sound Financial Position. Drumsallen PS is considered to be unsustainable.

ASSESSMENT OF SPECIAL CONSIDERATIONS

Rural Needs Act (NI) 2016

79. The Rural Development Council's (RDC) '*Striking the Balance*' report highlights the importance of rural proofing so that regard is given to the impact of a particular policy on rural populations (in comparison to those living in urban areas) and to help identify adjustments which might be made to reflect rural needs and ensure that services are accessible to rural communities on a fair basis. A central concern is the quality of education provided to pupils.
80. The SSP policy was assessed against the RDC rural proofing checklist (*Striking the Balance*, Annex 1) and no adverse impact was identified. The SSP recognises the needs of rural communities and this is reflected in the lower enrolment threshold for rural primary schools, the accessibility criterion which provides guidance on home-to-school travel times and the criterion strong links with the community also recognises the central place a school has for many communities (urban and rural).
81. The Government's commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 ('The Act'). The Act requires public authorities to have 'due regard' to consciously consider the needs of people in rural areas when developing policies, strategies and plans and

when designing and delivering public services. It defines 'rural needs' as "the social and economic needs of rural areas".

82. The CfC states that the 'The Act' places a statutory duty on the EA to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services.
83. Comments received during the EA's pre-publication statutory consultation in the CfC state that the school is a hub for Drumsallen Rural Community Association; rural schools are a vital part of the rural community and that rural children deserve to be educated in a school that is part of their local community.
84. The SSP states that 'strong, sustainable schools providing quality education and access to the full curriculum are central to the achievement of the educational vision'. One of the objectives of the SSP is to ensure that the excellent quality of education available to some young people is made available to all, in both urban and rural settings.
85. The CfC advises that the area from which Drumsallen PS attracts pupils is, according to the Inter-Departmental Urban-Rural Definition Group, defined as rural and the discontinuance of Drumsallen PS will have an impact on the local area.
86. The CfC states that the EA's transport policy would be applied to pupils displaced, with transport provided for pupils with entitlement to their nearest school.

Section 75 of the Northern Ireland Act 1998

87. The CfC advises that comments included in questionnaires, as part of the EA's pre-publication consultation, reference the negative impact that the closure of Drumsallen PS will have on the Protestant community by reducing parental choice in the Controlled sector, thereby engaging Section 75.
88. As set out in Table 1, there are three alternative Controlled primary schools within a five mile mapping radius of Drumsallen PS, at which primary provision is available. Although there are no available places in Churchill PS and Armstrong PS, the nearest provision at Killylea PS, over two miles away from Drumsallen PS has 28 available places in 2019/20 and therefore would have capacity to accommodate pupils from Drumsallen PS, should this be the parent's choice. Map 1 confirms that Killylea PS could be an option for some pupils due to their location and their proximity to Killylea PS. Although ideally pupils would attend an alternative sustainable school, additional pupils attending Killylea PS may help this school's sustainability. Travel to Killylea PS would be within the home-to-school transport travel time of 30 minutes, as detailed in the SSP.

Effective and Efficient Use of Public Funds

89. In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of resources available to it. The assessment of Drumsallen PS against the criteria and indicators of the SSP demonstrates that the school is unsustainable and fails to meet the Sound Financial Position criterion.
90. As a very small school with only 22 pupils enrolled in 2019/20, the school receives the maximum Small Schools Support funding and a per capita allocation of £6,281 which compares to an average for all primary schools of £3,213. The CfC states that *'the operation cost of Drumsallen PS will be a cost saving from this proposal'*.
91. The evidence set out above confirms that Drumsallen PS is operating in a deficit position which is highly in excess of the +/- 5% range for budget surpluses/deficits stipulated by the Department and the CfC asserts it is projected to increase further year on year.

OTHER CONSIDERATIONS

Shared Education

92. The Shared Education Act (NI) 2016 makes legislative provision in relation to Shared Education. It provides a definition of Shared Education and confers a duty on the Department of Education to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.
93. Shared Education is well developed in the local area with 10 of the 11 local schools (including Drumsallen PS) involved in Shared Education through the CASE¹ project.
94. The CfC states that the EA discussed the potential for Shared Education within the area and concluded that a shared solution would not improve the sustainability of Drumsallen PS.

Population Projections

95. NISRA 2018-based population projections indicate that over the decade mid-2018 to mid-2028, the number of children across all of Northern Ireland (i.e. those aged 0-15) is projected to decrease by 4.5 per cent (equivalent to 17,800 children).
96. Although the projections indicate an overall growth rate in the population of Armagh City, Banbridge and Craigavon LGD of 8.1 per cent, the population of children in this area is projected to experience a decline of 1.0 per cent.

¹ Collaboration through Sharing in Education

97. Natural change (births minus deaths), and net migration are taken into account when population projections are being developed.

Financial Implications

Staffing

98. The CfC states that teaching staff are afforded employment protection under the School Re-organisation Agreement (TNC 2013/2) for two years. The non-teaching staff will be afforded employment protection for one year. The EA will meet with staff to discuss options should the proposal be approved and an action plan implemented for the discontinuance of the school.

Transport

99. The CfC sets out the concerns raised during the EA's pre-publication consultation regarding school choice available and whether transport will be available.
100. The CfC states that the discontinuance of Drumsallen PS will require the provision of home-to-school transport for pupils and that communication with the EA transport service is ongoing. The CfC adds that any transport arrangement will be implemented within transport regulations and will provide for the safe transportation of pupils from the area to their nearest school.
101. Given the small pupil numbers involved and the close proximity of the next nearest alternative primary provision, it would be anticipated that the financial implications for the transport budget would not be significant.

Accommodation

102. Although there are no accommodation costs associated with the proposal, the CfC asserts that there may be a requirement for additional accommodation to facilitate the relocation of pupils. This cannot be assessed until parental preference for alternative primary schools is expressed.
103. As illustrated in Table 1, there is capacity to accommodate additional pupils at the nearest alternative school, therefore, it is unlikely that additional minor works at other schools would be needed.

Educational Impact

104. The educational impact of the proposal is set out in the CfC and this includes the following key points:-
- The proposal would provide for the educational needs of pupils in the area.
 - As a two teacher school, this places pressure on the staff at the school.

- The schools within the area received good/very good/outstanding ETI reports and can provide for the educational needs of the pupils.
 - In the nearest school there is currently capacity.
 - The larger schools will enhance the learning experience of pupils in the provision of after school activities and having class sizes to facilitate participation both in school and inter school activities, eg football and quiz teams.
 - Pupils with special educational requirements will continue to have these needs met within the local schools and supported through the EA's Children and Young People's Service.
105. Attendance at a sustainable school underpins the fundamental principles of the SEN Code of Practice which focuses on the continuum of needs and a continuum of provision which may be made in a variety of forms. Children with SEN require the greatest possible access to a broad and balanced education, including the Northern Ireland Curriculum.

CONCLUSION

106. The Department's vision is to ensure that every learner fulfils his or her full potential at each stage of development. All Departmental policies and processes, including Area Planning, contribute to the delivery of that vision and all have, as a central tenet, the educational well-being of children and young people.
107. The SSP, implemented through Area Planning, is clear that the core issue for a school's sustainability must be the continuing provision of a high quality education for the children. Generally, it is acknowledged that as numbers in a school decline, the challenges it must overcome in order to provide a high quality education rise.
108. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers. Drumsallen PS is now operating with two composite classes, once encompassing three year groups and one with four. The school has 2.17 full-time equivalent teachers.
109. Inspection evidence shows that within a composite class of two year groups, it is possible for all children to be catered for effectively and make good progress. There is no evidence from school inspections to suggest that children taught in composite classes of two year groups are disadvantaged in any way.
110. However, additional factors need to be considered when the composite class spans more than two year groups. Under these circumstances ensuring adequate progression in learning and planning to meet, and meeting, the individual needs of children across a wider ability range and stage of development can be more challenging for the teacher. There are also issues

relating to opportunities for the children to develop socially and emotionally with children of a similar age, gender and stage of development.

111. The CfC asserts that the proposal aligns with the key themes of Area Planning. The Area Plan aims to ensure that all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education.
112. In 2019/20, Drumsallen PS has a total enrolment of 22 pupils. The school's enrolment has been in decline in the last five years with only three pupils admitted in 2019/20. At the conclusion of the primary school's admissions process, statistics show that there are no first preference applications for 2020/21 for the primary school but two for the school's reception class. The pattern of enrolment as set out in Table 5, is continuing.
113. The CfC states that there will be cost savings in the recurrent costs of operating the school. The evidence set out above shows that the per capita cost of £6,281 for Drumsallen PS is significantly above the average for all primary schools at £3,213. The school is currently in a financial deficit position and the declining enrolment numbers will only exacerbate the financial pressures. It would represent an inefficient use of public funds to continue sustaining a school that is assessed as unsustainable against the SSP criteria.
114. There is capacity in alternative primary schools in the area to accommodate pupils currently attending Drumsallen PS. The CfC states that the EA will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department to endeavour to ensure that pupils affected by the proposal be accommodated, where possible, and within current guidelines/policies. The CfC states that if DP 609 is approved, larger schools will enhance the learning experience of pupils in the provision of after school activities and having class sizes to facilitate participation both in school and inter-school activities.
115. The CfC acknowledges that the discontinuance of Drumsallen PS will have an impact on the local area but advises that the provision of home-to-school transport will mitigate against this impact.
116. The EA, as the proposer of DP 609, supports the proposal to discontinue Drumsallen PS. Only five letters of objection to DP 609 were received. The CfC advises that the staff are not disputing the closure and the BoGs has asked for a timely decision.
117. The closure of any school is a difficult decision however the evidence of sustainability issues impacting on Drumsallen PS is compelling and there is alternative primary provision available in the local area which should allow for a smooth transition in the best educational interests of the pupils.
118. DP 609 proposes that Drumsallen PS should discontinue from 31 August 2020, however, due to the Covid-19 (Coronavirus) pandemic, schools in Northern

Ireland have been closed (except for vulnerable and / or key worker children) since March 2020. Due to the unforeseen delay in the progression of the proposal, it is considered that the proposed implementation date is now unachievable. Parents may not be able to contact local schools to accommodate displaced pupils and staff would not be afforded the statutory consultation period for transfer or redundancy. It is therefore recommended that the implementation date of this proposal is modified to 31 August 2021 at the latest, giving sufficient time for the EA and school to adequately plan for its closure.

RECOMMENDATION

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

(i) **Approve the modified DP 609** that:

Drumsallen Primary School will discontinue with effect from 31 August 2021, and no later.

(ii) Agree that this submission (with appropriate redactions) can be published on the Department's website once the EA and the school have been notified of your decision.

(iii) In making your decision, you may wish to state that it is important that the EA should ensure children and their parents are supported through the transition to other sustainable schools in the area. Every effort should be made to minimise the disruption to children's educational experiences and support, care and attention should be given to affected teaching and non-teaching staff who are impacted by this closure.

120. The following appendices are attached for your consideration:

Appendix A: Copy of Published Development Proposal 609

Appendix B: Case for Change

Appendix C: Responses Received During the Two-Month Statutory Objection Period

Appendix D: ETI Comments

Appendix E: DE (Policy Team) Comments



EAMONN BRODERICK

Area Planning Policy & Shared Education Campuses Team

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cc Derek Baker
Lianne Patterson
Fiona Hepper
Audrey McIlorum
John Smith
Ricky Irwin
Mark Bailey
Philip Irwin
Janis Scallon
Lorraine Finlay
Bill Stevenson
Adrian Murphy
Scott Harbinson
Clare Baxter
SpAd
Press Office
APPT Correspondence

APPENDIX A

EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL NO 609

DRUMSALLEN PRIMARY SCHOOL

Notice is hereby given that a Proposal under Article 14 of the Education and Libraries (Northern Ireland) Order 1986 has been submitted by the Education Authority to the effect that:

Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.

A copy of the Proposal and Case for Change may be inspected at the offices of the Education Authority located at 1 Hospital Road, Omagh, BT79 0AW, between the hours of 9.00 am and 4.30 pm and www.eani.org.uk/school-management/area-planning.

Any objections or support to this Proposal should be lodged with the Area Planning Policy Team, Department of Education, Rathgael House, Balloo Road, Bangor, Co Down, BT19 7PR or emailed to dps@education-ni.gov.uk within two months of the date of publication of this notice. Any letters of objection or support may be published on the Department of Education's website, with appropriate redactions, if they are included in full in the submission on which the outcome of the proposal is decided.

The Department of Education and the Education Authority operate a regime of openness under the Freedom of Information Act. Letters of objection and information supplied to the Department of Education and the Education Authority may be subject to disclosure under the Freedom of Information Act, if requested. (A fee may be charged for supplying this information).

Sara Long
Chief Executive

CASE for CHANGE – Supporting Information**SUMMARY/OVERVIEW**

AREA PLANNING DISTRICT	Armagh, Banbridge and Craigavon
DP NUMBER	DP 609
PROPOSER	Kim Scott Acting Director of Education Education Authority
SCHOOL(S) NAME	Drumsallen Primary School
SCHOOL REFERENCE	501-1117
TYPE	Primary
MANAGEMENT	Controlled
DP PUBLICATION DATE	Week beginning 20 January 2020
PROPOSAL	Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.

STATUTORY CONSULTATION

Note: It may be necessary for documentary evidence to be provided to show that the statutory procedures have been followed. It is essential that relevant parties retain this information.


The following is to be completed by the Proposer and signed off by them.

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

<p>PROPOSER</p> <p>Provide detail of consultation with the BOGs, teachers and parents of the affected school(s) – dates of meetings/letters. Good practice suggests all staff (including non-teaching) should be consulted as well as pupils.</p> <p>Summary and assessment of views received – how were these taken into account before publication of the DP?</p>	<p>The Education Authority undertook consultation with:</p> <p>Staff: 12 September 2019 – 3.00pm Board of Governors: 12 September 2019 – 5.00pm Parents/Guardians: 12 September 2019 – 6.30pm Local Schools (16): Letter – 13 September 2019</p> <p>A pre-publication consultation questionnaire was distributed and available on the Education Authority’s website for the period 13 September 2019 to 18 November 2019.</p> <p>In total 13 responses were received. The information below provides a summary/emerging themes of the responses received.</p> <table border="1"> <thead> <tr> <th></th> <th>Agree</th> <th>Disagree</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Board of Governors</td> <td>1</td> <td></td> <td>1</td> </tr> <tr> <td>Staff – Teaching and Non-Teaching</td> <td>1 (made on behalf of all 8 staff members)</td> <td></td> <td>1 (made on behalf of all 8 staff members)</td> </tr> <tr> <td>Parents/Guardians</td> <td>6</td> <td>2</td> <td>8</td> </tr> <tr> <td>Other – Local Schools</td> <td>1</td> <td></td> <td>2</td> </tr> <tr> <td>Other – Controlled Schools’ Support Council</td> <td></td> <td></td> <td>1</td> </tr> <tr> <td>Total Responses Received</td> <td></td> <td></td> <td>13</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Drumsallen Primary School provides excellent education for the children of the area • School is a hub for Drumsallen Rural Community Association • Disappointment with Area Planning, as it created uncertainty amongst the parent body, which has a negative impact on enrolment • Unrealistic timescale for closure – must be informed of the official decision no later than 6 April 2020 or it will be a dereliction of the duty of care of the Education Authority and Department of Education • Rural schools are vital part of the rural community 		Agree	Disagree	Total	Board of Governors	1		1	Staff – Teaching and Non-Teaching	1 (made on behalf of all 8 staff members)		1 (made on behalf of all 8 staff members)	Parents/Guardians	6	2	8	Other – Local Schools	1		2	Other – Controlled Schools’ Support Council			1	Total Responses Received			13
	Agree	Disagree	Total																										
Board of Governors	1		1																										
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Parents/Guardians	6	2	8																										
Other – Local Schools	1		2																										
Other – Controlled Schools’ Support Council			1																										
Total Responses Received			13																										

	<ul style="list-style-type: none"> • School provides excellent standards of teaching and learning and pastoral care • Frustration at the timescale need an early decision to find suitable alternative provision for children • Uncertainty about siblings as decision will be made after the Year 1 intake in January • Wellbeing of pupils, teachers and parents needs to be the most important • Concern over school choice available and if transport will be available to that school chosen • Nine months is too long to wait for a confirmed decision • Other schools have higher levels of financial deficit • Concerns over SEN provision at other schools • Reject the SSP statement re composite classes – standardised scores show every child Year 4-7 achieving a result in English or Maths at or beyond their measured ability • Dispute the statement that larger schools will enhance the learning experience in the provision of after school activities • All pupils at Drumsallen Primary School have ample opportunities to attend a full range of extra-curricular activities • Reject the statement – that as a two teacher school there is pressure on the staff. • Transferred redundancy list should be made available to staff once it is published as staff are not disputing the closure • Physically closing a school is lengthy and time consuming and having spoken with union representatives staff are not obliged to work July and August • Not having a decision until May 2020 leaves parents uncertain in accessing the new school of their choice • Health and wellbeing of staff and their families is not being considered • The Education Authority is minded to progress this proposal that the educational provision for pupils and the welfare of pupils and staff are paramount in its considerations. <p>During the consultations undertaken with governors, staff and parents/guardians recurring themes emerged:</p> <p><i>The decision made as timely as possible</i> The Education Authority had planned to progress with pre-publication consultation in May 2019, however, at the expressed wish of the Board of Governors the Education Authority agreed to undertake the pre-publication consultation in September 2019. The Board of Governors were advised of and acknowledged the tight timescale.</p> <p><i>Availability of places in local schools</i> The Education Authority will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department of Education to endeavour to ensure that pupils affected</p>
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	<p>by the proposal be accommodated, where possible and within current guidance/policies.</p> <p><i>Transport concerns</i> The Education Authority's transport policy would be applied to pupils displaced with transport provided for pupils with entitlement.</p> <p><i>Children with Special Educational Needs</i> The support which the Education Authority provides for the pupils will continue regardless of the school they attend.</p> <p>Section 75 – Comments from Questionnaires The closure of Drumsallen Primary School will negatively affect primary age pupils and further reduce parental choice in the controlled school sector thus negativity impacting on the protestant community.</p>
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<p>CONFIRMATION BY THE PROPOSER</p>	<p>I confirm that the school's BOGs, staff and parents of pupils were consulted on 12 September 2019 and Equality Screening of the proposal has been carried out and the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate) have been considered.</p> <p>NAME: Kim Scott</p> <p>OFFICE HELD: Acting Director of Education</p> <p>SIGNED: </p> <p>DATE: 16 January 2020</p>
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ASSOCIATED PROPOSALS

<p>DP XXX Published DD/MM/YY</p>	<p>N/A</p>
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**The following is to be completed and signed off by the EA.
EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY
CONSULTATION**

<p>THE EDUCATION AUTHORITY</p>	<p>I confirm that the schools which the EA consider might be impacted by this proposal were consulted on 13 September 2019.</p> <p>NAME: Kim Scott</p> <p>OFFICE HELD: Acting Director of Education</p> <p>SIGNED: <i>Kim Scott</i></p> <p>DATE: 16 January 2020</p>
<p>Provide detail of consultation with schools that may, in the EA's opinion, be affected by the proposal – list of schools, dates of letters issued to schools/meetings.</p> <p>Summary of views received (number of responses, recurring themes, petitions, community support or opposition).</p> <hr/> <p>Responses/Assurances in respect of issues raised during consultation.</p> <hr/> <p>Dates of EA meetings e.g. Education Committee/ Board etc.</p> <p><u>Details of issues raised by members of EA Board</u></p>	<p>In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 13 September 2019, to schools which, in the opinion of the Authority, might be affected by the proposal. A total of 16 local schools which might be affected by the proposal were forwarded correspondence. Comments were invited from the Boards of Governors and Trustees, to be returned to the Education Authority by 18 November 2019.</p> <p>Two responses from local schools were received. One agreed with the proposal and one abstained from agreeing or disagreeing.</p> <p>Killylea Primary School</p> <ul style="list-style-type: none"> • Saddened at the proposal and are aware of the dedication of the staff to ensure the best learning for all the pupils • Area Planning must pro-actively work with local schools to ensure continuation of sustainable controlled education in our area • Already seen the closure of Benburb, Eglis, Tynan and Aghavilly • Rural children deserve to be educated in a school that is part of their local community <p>Churchill Primary School</p> <ul style="list-style-type: none"> • Acknowledge the contribution the school makes to the local community and high quality education • Outcome must ensure the needs and concerns of the entire school community are addressed <p>This development proposal was discussed by the Education Authority's Education Committee at its meeting on 16 January 2020.</p>

**EDUCATION AUTHORITY
COMMENTS**

In the context of planning on an area basis – what is the EA’s view of the proposal, taking into account any pre-publication consultation. Does the EA support the proposal?

NAME: Kim Scott

OFFICE HELD: Acting Director of Education

SIGNED: 

DATE: 16 January 2020

The Education Authority, as the proposer, supports Development Proposal No 609 to discontinue Drumsallen Primary School with effect from 31 August 2020, or as soon as possible thereafter.

Consultations were undertaken with governors, staff and parents/guardians outlining the Education Authority’s Case for Change detailing the rationale for the proposal. During the consultations undertaken with governors, staff and parents/guardians recurring themes emerged:

The decision made as timely as possible

The Education Authority had planned to progress with pre-publication consultation in May 2019, however, at the expressed wish of the Board of Governors the Education Authority agreed to undertake the pre-publication consultation in September 2019. The Board of Governors were advised of and acknowledged the tight timescale.

Availability of places in local schools

The Education Authority will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department of Education to endeavour to ensure that pupils affected by the proposal be accommodated, where possible and within current guidance/policies.

Transport concerns

The Education Authority’s transport policy would be applied to pupils displaced with transport provided for pupils with entitlement.

Children with Special Educational Needs

The support which the Education Authority provides for the pupils will continue regardless of the school they attend.

In consideration of the above, and the Case for Change, the Education Authority is proposing to publish Development Proposal No 609 during the week commencing 20 January 2020.

BACKGROUND

Drumsallen Primary School is a controlled primary school situated between Killylea and Benburb in County Armagh.

The school serves the community surrounding the school and has an enrolment of 22 pupils. In consideration that the school operates as a two teacher school and, with a declining enrolment, the school was identified in the 2017/18 Annual Action Plan as 'Managing authority to consult on options for future provision by March 2018'.

The school has an approved enrolment of 93 pupils and an admissions number of 13.

Over the past number of years the school has experienced a downturn in enrolment numbers. Table 1, below, details the historical and current enrolment figures.

Table 1: Enrolment Statistics									
	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Total
2009/10		7	7	6	8	7	7	9	51
2010/11		2	7	6	6	7	7	7	40
2011/12	2	4	2	7	5	6	7	7	38
2012/13		5	6	2	9	5	6	7	40
2013/14		1	5	6	3	9	5	6	35
2014/15	4	0	1	4	6	3	9	5	28
2015/16	2	5	0	1	4	6	3	9	28
2016/17		4	5	0	1	4	6	3	23
2017/18	2	2	4	5	0	1	4	5	21
2018/19		6	3	4	5	0	1	4	23
2019/20*		3	6	3	4	5	0	1	22

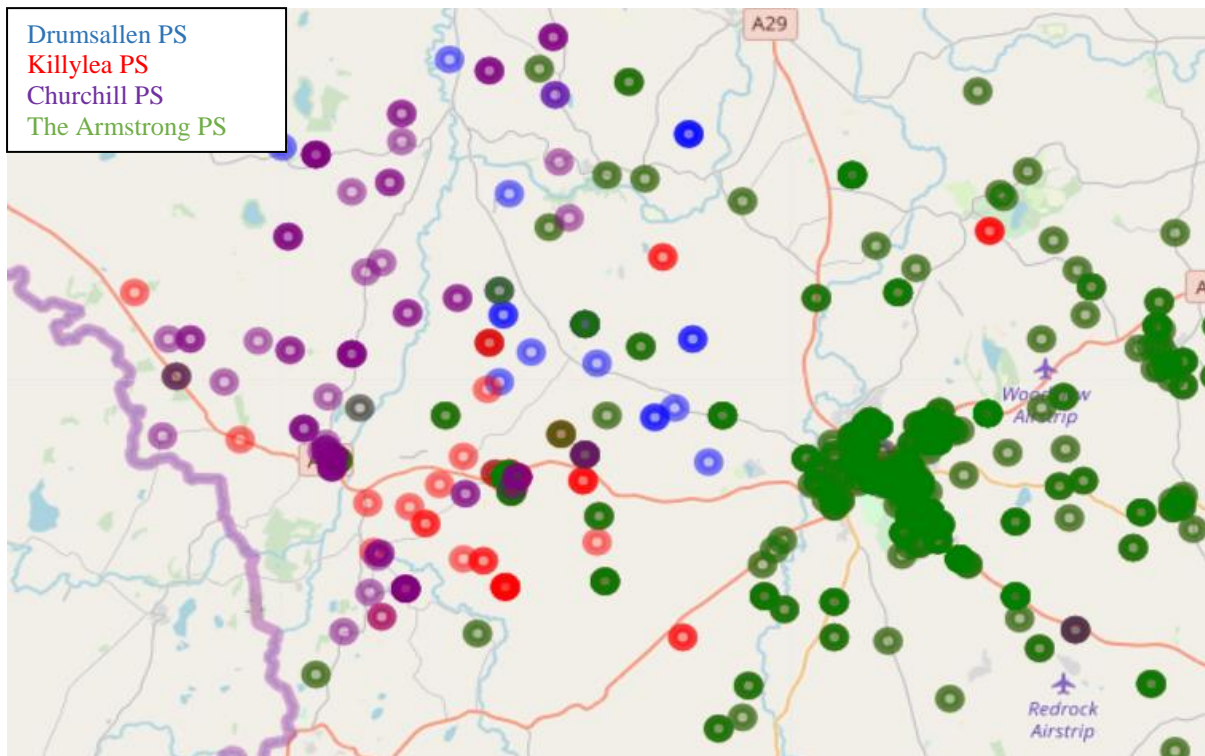
*Source: school

The enrolment statistics show that the school population numbers have declined since 2009 resulting in only 23 pupils currently enrolled at the school. The school has three first preferences for Year 1 in September 2019.

Table 2 lists the schools closest to Drumsallen Primary School. The distribution map shows in context the pupil distribution and the local schools. The map highlights that pupils are currently passing Drumsallen Primary School and accessing local schools. There is capacity within the local schools as detailed in Table 2.

Table 2: Local Schools – Distance from Drumsallen Primary School					
	Distance (miles) From Drumsallen PS	Sector	Enrolment 2018/19	Approved Enrolment Number 2018/19	Unfilled Places 2018/19
Killylea PS	2.7	Controlled	65	92	33
Churchill PS	5.1	Controlled	88	82	-1
Armstrong PS	5.1	Controlled	545	443	-85
St Joseph's PS, Caledon	5.1	Catholic Maintained	33	87	54
Our Lady's PS	2.1	Catholic Maintained	185	175	-10
Saints & Scholars IPS	6.4	Integrated	248	310	62

The distribution map below shows the pupil distribution for Drumsallen Primary School and the nearest schools.



In consideration of the distance of the local schools, home-to-school transport arrangements will be implemented within transport regulations.

2 SUSTAINABILITY ASSESSMENT

The main focus of the Area Planning process is embedded in the Sustainable Schools Policy first published in 2009 and applies to primary and post-primary schools. The policy outlines the criteria that school managing authorities should consider when making decisions affecting the best use of resources in order to deliver an excellent education to children and young people. The policy sets out 6 sustainability criteria, and associated indicators, which are identified as the key references for assessing existing and future education provision to ensure it adequately meets the needs of pupils.

2.1 Quality of Education

Drumsallen Primary School is situated between Killylea and Benburb in County Armagh. The children attending the school come from a wide catchment area. The enrolment has decreased in recent years.

An ETI inspection was undertaken in February 2011 with the overall findings of the inspection as good:

The ETI report indicated:

'In the areas inspected, the quality of education provided by this school is very good. The school is meeting very effectively the educational and pastoral needs of the children; and has demonstrated its capacity for sustained self-improvement.

Achievements and Standards

- The quality of the children's achievements and standards is very good.*
- In English and mathematics, nearly all of the children attain standards in line with their ability. The school makes good use of the available performance data to identify the individual needs of the children and has put in place a range of appropriate strategies which are having a positive impact on their learning and the standards that they attain.*
- The children identified with special educational needs make very good progress in learning across the curriculum and almost all reach the standards of which they are capable by the end of year 7.*

Provision for learning

- The provision for learning is very good and is satisfactory for the Reception children.*
- The children are well behaved and mannerly and respond well to the staff's high expectations.*
- The teachers and support staff are conscientious and hard-working. They work effectively as a team and are fully committed to the education and care of the children. In the lessons observed the quality of the learning and teaching observed ranged from satisfactory to outstanding. The majority of the lessons observed were outstanding.*
- The provision for special educational needs is very good. The children's needs are identified at an early stage, comprehensive education plans are drawn up, a variety of programmes of support are implemented and the progress made by each child is monitored and reviewed regularly.*
- The quality of the arrangements for pastoral care is outstanding. This is evident through the strong inclusive and community ethos, the excellent working relationships at all levels and the extent to which the school informs and involves the parents in the life and work of the school.*
- The school has very good comprehensive arrangements in place for safeguarding children. These arrangements reflect the guidance issued by the Department of Education (DE).*
- The school gives good attention to promoting healthy eating and physical activity, for example, through the provision of healthy breaks, regular physical activity sessions and a range of extra-curricular sporting activities.*
- The quality of the provision for the Reception children needs to be reviewed in line with the DE pre-school curricular guidance.'*

2.2 Stable Enrolment Trends

Drumsallen Primary School has, as detailed in Table 1, experienced a downturn in pupil numbers over the past number of years. The September 2018 enrolment was 23 pupils. Based on admission trends, the school's enrolment would fall further for September 2019. The school's enrolment falls well short of the Sustainable Schools Policy criteria for a rural school, 105 pupils. In addition there are more than two year groups within a classroom as the school operates as a two teacher school.

2.3 Sound Financial Position

Drumsallen Primary School is operating at 31 March 2018 with a deficit of -£100,387. This deficit is projected to increase by a further £54,000 during the 2018/19 year. Due to the small number of pupils, this situation will only increase further year on year (estimated -£54,000 in-year deficit).

Strong Leadership and Management

The ETI report in February 2011 stated that the leadership and management of the school was very good. It reported that:

- *'The Acting-principal provides very good leadership. She is fully committed to the life and work of the school. Her vision for the future development of important aspects of the school is exemplified well through the School Development Plan and associated action plans.*
- *All of the coordinators provide valuable support and guidance to the staff and have identified appropriate developmental needs regarding their respective areas of responsibility.*
- *The whole school self-evaluation and school development planning processes are good.'*

2.5 Accessibility

The school can be accessed by car and bus. Access by foot is on a busy road. The majority of pupils attending the school are from the local area.

2.6 Strong Links with the Community

The school has strong links with the community.

3 AREA PLANNING IMPACT

The proposal aligns with the key themes of Area Planning. The Area Plan for Northern Ireland aims to ensure that all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education. It sets out the key priorities and objectives in providing access to a network of sustainable schools for the Education Authority, Council for Catholic Maintained Schools and other sectoral bodies in the light of Department of Education policy, in particular the need to raise standards and close the attainment gap through a network of sustainable schools. The focus of the plan is on the educational best interests of children and young people.

Since 2011, statutory planning authorities and school managing authorities have been engaged in implementing the objectives of the Sustainable Schools Policy through Area Planning. The first four objectives are:

- ensure that the excellent quality of education available to some young people is made available to all, in both urban and rural settings, in accessible, modern, fit-for-purpose accommodation;
- improve outcomes for all but, in particular, to provide additional support to those who require it, including those children with special educational needs, to realise their full potential;
- encourage schools to co-operate in sharing best practice to support children with special educational needs and those with other barriers to learning;
- sustain strong, successful and viable schools, well-led by their governors representing local stakeholders, principals and their staff, to be the centre of the education system, supported by effective administrative and strategic direction.

In consideration of the objectives of Providing Pathways Strategic Area Plan for School Provision 2017-2020, the Area Planning Local Group identified Drumsallen Primary School as a school to be included within the Annual Action Plan for Primary, Post-Primary and Special Schools April 2018–March 2019. Drumsallen Primary School was identified under the key issue as 'address school provision where sustainability is an issue' with the action 'Managing

authority to consult on options for future provision of Drumsallen Primary School by March 2019’.

The ETI report of February 2011 reported that:

‘The school is meeting very effectively the educational and pastoral needs of the children; and has demonstrated its capacity for sustained self-improvement It will be important that the employing authority, school Board of Governors (governors) and the staff plan for, and manage, issues related to the sustainability of the school provision and school budget, in order to address the current and future needs of the children and the staff.’

In taking forward the Annual Action Plan for 2018/19, EA officers met with the governors of Drumsallen Primary School to discuss the issues impacting on the school and put forward a number of options for consideration. Appendix A details the options considered.

The EA recommended option is to discontinue Drumsallen Primary School with effect from 31 August 2020, or as soon as possible thereafter and to take the option forward through the development proposal process. Within the area there are no active development proposals.

4 RATIONALE FOR PROPOSAL

Drumsallen Primary School has always been a small primary school with an enrolment over the past number of years not exceeding 40 pupils. The school was identified in the Annual Action Plan 2018/19, as a school provision where sustainability is an issue’ with the action ‘Managing authority to consult on options for future provision of Drumsallen Primary School by March 2019’.

As the school is experiencing a reduction in pupil numbers, this will place increased pressure on the financial resources of the school and also on the teaching staff.

Rural Needs Act (Northern Ireland) 2016 places a statutory duty on the EA to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services. The areas from which Drumsallen Primary School attracts pupils is, according to the Inter-Departmental Urban-Rural Definition Group, defined as rural. The discontinuance of Drumsallen Primary School will have an impact on the local area. The provision of home-to-school transport will provide for the safe transportation of pupils from the area to their nearest school.

5 EDUCATIONAL IMPACT

The proposal would provide for the education needs of pupils in the area. Drumsallen Primary School has a declining enrolment and, as a two teacher school, this places pressure on the staff at the school.

The schools within the area received good/very good/outstanding ETI reports and can provide for the educational needs of the pupils of the area. In the most nearest school there is currently capacity. Resulting from the outcome of consultations with parents/guardians, discussions will be undertaken with the local schools regarding in-year group capacity. The local schools have pupil numbers which meet the Sustainable School Policy of no more than two year groups in a classroom. The larger schools will enhance the learning experience of pupils in the provision of after school activities and having class sizes to facilitate participation both in school and inter-school activities eg football teams, quiz teams.

The pupils from Drumsallen Primary School who have special educational requirements will continue to have these needs met within the local schools and supported through the EA's Children and Young People's Service.

6 IMPLEMENTATION PLAN (IF THE PROPOSAL IS APPROVED)

The proposal is being brought forward under Article 14 of the Education and Libraries (Northern Ireland) Order 1986. The implementation date for the proposal is for 31 August 2020, or as soon as possible thereafter. The timetable, pending approval from the Education Committee, for the consultation process is:

Development Proposal Timeline	
Proposal: Drumsallen Primary School will discontinue with effect from 31 August 2020, or as soon as possible thereafter.	Proposed Timeline
Consultation with Governors, Staff, Parents (8 weeks) Consultation Responses to be forwarded to the Education Authority Responses will be considered and a Case for Change document compiled before submission to the Education Authority's Education Committee. A deputation from the Board of Governors may also choose to attend the Education Committee or the Board meeting.	12 September – 1 November 2019
Consultation with other affected Schools (8 weeks) Consultation Responses to be forwarded to the Education Authority Responses will be considered and a Case for Change document compiled before submission to the Education Authority's Education Committee	13 September – 18 November 2019
Education Committee to seek Approval To Publish Case for Change to be taken to the January 2020 Education Authority's Education Committee for consideration If approved to publish, a Development Proposal will be published in the local newspapers which begins the start of a two month statutory objection period	16 January 2020
Statutory Objection Period (2 months) Objections/Comments to be forwarded to the Department of Education	Week commencing 20 January 2020 (2 months)
Await Ministerial/Department of Education Decision	April 2020
Implementation If approved, the Development Proposal would take effect from 1 September 2020, or as soon as possible thereafter.	

RESOURCE IMPLICATIONS

The proposal is for the discontinuance of Drumsallen Primary School. As there are currently unfilled places within the local schools, there may be a requirement for additional accommodation to facilitate the relocation of pupils (to be identified by parental preference resulting from the consultation process). There will be a cost saving in the recurrent costs of operating a school.

Finance The operation cost of Drumsallen Primary School will be a cost saving from this proposal.

Staffing The teaching staff is afforded employment protection under the School Re-organisation Agreement 2013/2 for two years. The non-teaching staff will be afforded employment protection for one year. The EA will meet with staff to discuss options should the development proposal be approved and an action plan implemented for the discontinuance of the school.

Transport The discontinuance of Drumsallen Primary School will require the provision of home-to-school transport for pupils. Communication with the EA transport service is ongoing. Any transport arrangement will be in accordance with transport regulations and identified preference school.

Accommodation Some minor additional accommodation may be required. This will be identified as the consultation process progresses through parental choice in the location of a preferred local school.

Drumsallen Primary School

The Providing Pathways Strategic Area Plan for School Provision 2017-2020 Annual Action Plan for Primary, Post-Primary and Special Schools April 2018 – March 2019 identified a key issue for Drumsallen Primary School as ‘address school provision where sustainability is an issue’ with the action ‘Managing authority to consult on options for future provision of Drumsallen Primary School by March 2019’. As a result the EA engaged with the Board of Governors of Drumsallen Primary School. Engagement discussions focused on the current position of the school and sustainable options for the school. Discussion focused on five options:

1 Do Nothing

This option would result in no change to the current provision. In consideration of the Annual Action Plan, the downturn in enrolment numbers and the school’s financial position, do nothing is not an option.

2 Shared Education

As the EA has a duty to encourage, facilitate and promote shared education the EA discussed the potential for shared education within the area. However, given the close proximity of the school to other schools, a shared solution would not improve the sustainability of Drumsallen Primary School.

6 Federation

A federation would involve local schools coming together either through a soft federation or hard federation. A soft federation would provide each school with its own governing body, own budget, with representatives on a joint committee. The schools would share a Principal, common goals, joint committee recommendations but it would be up to the individual governing bodies to authorise decisions/plans. A hard federation would provide for a single governing body with common goals and while each school would receive individual budgets, these could be used to pool budgets across the schools in the federation. In considering a federation, the sustainability of a federated school within the local area would not provide for a sustainable provision and would not improve the financial position of the school. It was felt that to have a shared principal would not meet the needs of the pupils at the school.

4 Amalgamation

As with the options above, sustainability is an issue. The area is served by three schools, Killylea Primary School, Churchill Primary School and The Armstrong Primary School.

5 Discontinue

In considering the future of Drumsallen Primary School, all of the options for the school did not provide a sustainable provision for the school. In discussions with the Board of Governors, there was disappointment that the work of the governors could not provide a sustainable solution for the school. Governors put forward proposals to promote the school, however, September 2019 intake and current enrolment trends have not provided any upturn in numbers. The EA recognises the commitment of the governors but the current circumstances would not provide for the curricular provision of pupils currently attending Drumsallen Primary School.

In consideration of the options above, the EA recommends that Drumsallen Primary School discontinues with effect from 31 August 2020.

Responses Received During the Two-Month Statutory Objection Period



DRUMSALLEN PRIMARY SCHOOL

1 Dernasigh Road, Killylea, County Armagh, BT60 4PA

Telephone (028) 37548426

Email : jkelly577@c2kni.net

www.drumsallenps.co.uk

Area Planning Policy Team,
Dept. Of Education,
Rathgael House,
Balloo Road,
Bangor.

5th February 2020

Ref : Development Proposal 609 Drumsallen Primary School

Dear Sir/Madam,

The Board of Governors of Drumsallen Primary School wish to reiterate the sentiments expressed in our original response to the Education Authority's proposal to discontinue Drumsallen Primary.

It is of paramount importance that a decision regarding the future of the school is reached urgently following the period of public consultation and certainly no later than the end of April 2020.

You will appreciate the stress, caused by uncertainty, that parents, pupils and staff have been placed under while this consultation process has taken place and the need for a prompt decision.

Yours faithfully,

Allen Foster
Chairperson

EDUCATION AUTHORITY – SOUTHERN REGION



City of Armagh High School

Principal:

Mr C Douglas, BEng, PGCE, MEd

Vice Principal:

Mrs K P Mulholland, BSc (Hons), PGCE, PQH(NI)

23 January 2020

Ms S Kenny-Quinn
Area Planning and Policy Team
Department of Education
Rathgael House
Balloo Road
BANGOR
BT19 7PR

Dear Ms Kenny-Quinn

Development Proposal No 609 – Drumsallen Primary School

City of Armagh High School note the proposal to discontinue provision for pupils at Drumsallen Primary School from 31 August 2020, or as soon as possible thereafter. As a feeder primary City of Armagh High School would wish for assurances that there will be alternative suitable controlled provision for pupils at the school.

Yours faithfully

W H Scott
Chair of the Board of Governors

AREA PLANNING
14 FEB 2020
POLICY TEAM

“Excellence, Opportunity and Care”

City of Armagh High School,
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Website: www.cityofarmagh.org



Controlled Schools' Support Council
2nd floor, Main Building
Stranmillis University College
Belfast, BT9 5DY
T: 028 9531 3030
E info@csscni.org.uk

20 March 2020

Dear Sir/Madam

Re: Development proposal 609 Drumsallen Primary School

The Controlled Schools' Support Council (CSSC) notes the publication of the Development Proposal to discontinue provision at Drumsallen Primary School with effect from 31 August 2020 or as soon as possible thereafter. CSSC has consulted with Drumsallen Primary School and other controlled primary schools in the area and welcomes the opportunity to make representation in the interests of the controlled sector.

CSSC notes the low enrolment in Drumsallen Primary School and recognises the challenges this presents for the Board of Governors and staff. CSSC would request that the educational experiences of pupils and the welfare of pupils and staff are paramount in the decision making process.

Should a decision be taken to approve this proposal CSSC would seek assurance that arrangements will be expedited to facilitate the enrolment of displaced pupils to minimise uncertainty and avoid disruption to their education. CSSC would wish to ensure that staff, both teaching and non-teaching, are supported in the process of redeployment and/or voluntary severance in keeping with the School Reorganisation Agreements.

Yours faithfully

Barry Mulholland
Chief Executive

Example Pro-forma Response

To whom it may concern,

I wish to lodge my objection to the closure of Drumsallen Primary School. I base my objection on the following points.

1: The census of live births for the area does not take into consideration the number of children who have moved to the area after birth. I myself have moved to the area with my son after he was born. He has not turned one yet so I feel these children are being completely ignored in your numbers.

2: Drumsallen Primary school offers an excellent quality of pastoral care, this offers all the children an excellent start in their young lives. Which should not be underestimated when considering the long term Financial cost to the government as a whole. The staff all know each child as an individual just one of a number. This has huge long term mental benefits to all the children as they progress towards adulthood in later years.

3: The standard of Education in Drumsallen is excellent with the limited budget that is given to them. The teachers structure the class to provide the best standard of education to all children of all abilities. The smaller classes offer great potential for one to one attention to all the children, where in larger classrooms this often means extra money is needed for one to one teaching.

4: Drumsallen Primary School also has the largest approved enrolment numbers of 93. If the long term plan of the EA is amalgamation {as the plan for Drumsallen seems to indicate} of Drumsallen, Killylea & Churchill primary schools. Then Drumsallen as a building has the capacity to hold more children than either of the other two.

5: To send children from a rural background to a larger city school, such as the Armstrong Primary in Armagh City would not only be detrimental to the long term mental health of these children. It would destroy the strong bond rural schools have with the local community.

6: The figure of 105 pupils in rural schools I feel is not realistic in Northern Ireland due to its wide spread population. We do not want our future generations to end up in classes of 30+. In a similar situation to England and Wales which have overcrowded classrooms with very young children getting lost in the sea of numbers.

The Education Authority should look at the long term cost of closing this school. As in future transport costs etc that sending these to other schools will involve. Not just the short term which I feel they are doing at the moment. My son will be the 4th generation of my family to attend Drumsallen. In my opinion this counts for more than just numbers on a page.

Yours sincerely

APPENDIX D

ETI Development Proposal 609 – Commentary Paper

Date of last ETI report: Monitoring Inspection in March 2017

Web link: <https://www.etini.gov.uk/publications/monitoring-inspection-involving-action-short-strike-drumsallen-primary-school-killylea>

Date²: 9 February 2020

1. Update on relevant/contextual information since the last published inspection report.

The school's enrolment is 23 children (13 families). The children are taught in two composite classes, year 1-3 and year 4-7.

2. Knowledge of **any contextual information on the quality of education** in the wider local area.

Killylea Primary School continued to demonstrate the capacity to identify and bring about improvement in the interest of all the learners in May 2019.

The inspection of the other neighbouring controlled school was impacted by industrial action in January 2019, Churchill Primary School <https://www.etini.gov.uk/sites/etini.gov.uk/files/publications/asos-primary-inspection-churchill-primary-school-caledon-county-tyrone-501-2538.pdf>

3. Potential benefits/concerns associated with the claims of **educational** benefits for pupils made in the Case for Change.

The closest controlled primary schools each have an enrolment of below 105 children and are under-subscribed. The children may have access to a wider range of teacher specialist areas.

² This commentary paper is based on the information and evidence available to ETI on this date. Please check the ETI website www.etini.gov.uk for any new inspection reports that may have published after this date.

4. Any concerns about the **implementation date or phasing of implementation** should this be applicable (i.e. curricular, EF, accommodation, LSCs, etc).

The management of the potential closure needs to allow parents sufficient time to enrol their child in an alternative school for September 2020 and to allow the staff to begin seeking alternative employment.

5. The **SSP Criteria** indicators requiring ETI input (if known and/or for which information is available).

Sustainable Schools Criterion	Indicator	Meets criterion		
		Yes	No (reason(s))	Information not available
Quality Educational Experience	1.1 Attainment levels of pupils, Key Stage tests pending development of new indicators for Primary Schools, GCSE results for Post-Primary Schools.			N/A
	1.2 In primary, a single classroom contains no more than <u>two</u> year-groups in a composite class; for example, years 1 and 2.		There are two composite classes: yr1-3 and yr4-7.	
	1.3 A <u>minimum</u> of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers.		There are two full-time teachers and one part-time teacher.	
	1.4 The ability of the school to cater for children with Special Educational Needs.			N/A
	1.5 The ability at post-primary level to be able to provide suitable access to the entitlement framework including, where appropriate, linkages with other schools, the FE sector or other providers.			
	1.6 The standards and the quality of learning and teaching at the school.			N/A
	1.7 The range of curricular and extra-curricular activities available for children including career guidance, physical education, music, art, drama and science.			N/A
	1.8 The quality of the <u>physical</u> environment for learning and teaching i.e. the condition,		Building is almost ninety years old and requires a lot of maintenance.	

	Energy and water efficiency and suitability of the buildings.			
	1.9 The quality of, and arrangements for, pastoral care including the active promotion of the principles of social justice in all areas of the formal and informal curriculum.			N/A
Strong Leadership and Management by Boards of Governors and Principals	4.1 Governors' views on the school based on quantitative and qualitative evidence.			N/A
	4.8 There is a school development plan in place and progress is being made to achieve the plan's aims and objectives.			N/A
	4.9 Pupil behaviour, expulsions, suspensions and non-attendance as well as positive behaviours such as involvement in school management (e.g. buddying and mentoring schemes).			N/A
Strong links with the Community	6.1 Degree and quality of parental involvement (schools will be asked to provide evidence on this).			N/A
	6.3 Contribution of the school to the community (schools will be asked to provide evidence on this).			N/A
	6.4 Presence of other features of provision, e.g. nursery or specialist unit.		No	

6. Summary of impact of the proposal

Consideration will need to be given to the transport available if children transfer to either of the closest controlled schools. Almost all of the children in Drumsallen PS come from the local rural area.

DE (Policy Team) comments

A	Financial Monitoring Team
B	Education Workforce Directorate
C	Inclusion and Wellbeing Directorate
D	Children and Young People's Services
E	School Access Team
F	Investment and Infrastructure Directorate
G	Equality Unit
H	Promoting Collaboration, Tackling Disadvantage Directorate (Shared Education)

A Financial Monitoring Team

The school's **Provisional Deficit** position as at 31 March 2020 is **-£155,710**.

The school's **Deficit** position as at 31 March 2019 is **-£99,034**.

The school's **Deficit** in the previous year, up to 31 March 2018 was **-£46,127**.

The school received a total delegated budget of £138,189 in the 2020-21 financial year for **22¹** FTE pupils, which generates a per capita of £6,281. The average for all primary schools is £3,213.

The total Free School Meals Entitlement for the school is **5³** pupils, which represents 22.73% of the total FTE, which places the school in Band 1 for funding purposes.

The school received £47,726 for Small Schools Support funding, which represents 100.00% of the maximum funding for this factor, within the Nursery & Primary funding stream.

The school also received £16,420 in respect of Primary Principals' Release Time.

³ The school's funding allocation is based on the previous year's census data (e.g. the October 2019 census data was used to determine the 2020-21 CFF allocation). **The census data on the Schools+ database relates to an academic year, as opposed to the financial year.** In addition, differences between funded pupils and total pupils within the census count may occur for a number of reasons, including, but not limited to, zero rated pupils, some reception pupils, and over age pupils (paragraph 7 of Annex B to the Common Funding Scheme refers).

Details of the school's budget allocation from the Common Funding Formula, for the last 3 years, is as follows:

Factor	2020-21 £	2019-20 £	2018-19 £
Pupil AWPU	52,470	52,527	45,317
TSN – Social Deprivation	3,068	2,454	1,841
TSN – Additional Social Deprivation	141	113	79
Premises Area	4,506	4,506	4,506
Premises FTE	1,859	1,938	1,762
Small Schools Support	47,726	45,120	45,183
Primary Principals Release Time	16,420	16,420	16,420
Foundation Stage	12,000	12,000	12,000
Teachers Salary Protection		3,373	3,774
Looked After Children		1,057	

Total School Funding	138,189	139,509	130,882
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Pupil FTE (no.)	22.00	23.00	21.00
Per Capita	£6,281	£6,066	£6,232

B Education Workforce Directorate

EWD has reviewed the Case for Change (CfC) and noted the staffing implications for teaching and non-teaching staff as highlighted in section 7 of the Case for Change.

Assurances should be sought from the Education Authority that any potential impact on terms and conditions of teaching and non-teaching staff are managed in accordance with the following policies:-

- **TNC 2013/2** – School Re-organisation Agreement and DE Circular 2013/7 – School Re-organisation Allowances: a teacher who suffers a reduction in pay as a result of staff re-organisation or re-deployment may be eligible to apply for a school re-organisation allowance.
- **TNC 2010/1** – Procedure for Handling Teacher Redundancy: will apply where a teacher is considered, or wishes to be considered for redundancy;
- **TNC 2011/8** – Workload Agreement: should the Case for Change result in an increase to enrolment in a school, or surrounding schools, assurance should be provided regarding how potential impact on teacher workload, as a result of the increased class size, will be managed.
- **JNC 224** – Collective Agreement for School Reorganisations – Employment protection for Support Staff will apply where the Case for Change may impact on the terms and conditions of non-teaching staff.

C Inclusion and Wellbeing Directorate

Special Education Team Input

It is noted from the case for change that Drumsallen Primary School was identified in the Annual Action Plan 2018-19 as a school provision where *'sustainability is an issue'*. The case for change further notes specific sustainability issues in relation to enrolment, the school financial position and composite classes.

Attendance at a sustainable school underpins the fundamental principles of the special educational needs (SEN) Code of Practice which focuses on the continuum of needs and a continuum of provision which may be made in a variety of forms. Children with SEN require the greatest possible access to a broad and balanced education, including the Northern Ireland Curriculum.

From a SEN policy perspective, therefore, SET would support this DP, subject to assurances that, as stated in the educational impact section, *'The pupils from Drumsallen PS who have special educational requirements will continue to have these needs met within the local schools and supported through the Education Authority's Children and Young People's Service'*

If this DP is not approved, however, SET would have concerns in regard to the potential limitations on pupils' development, particularly children with SEN, as detailed in the case for change and outlined above.

Pupil Support Input

Looked after children are the most vulnerable children in our society having suffered trauma, neglect and/or abuse and have learnt to survive in an unsafe world. They often have very complex needs, including cognitive difficulties linked to developmental trauma.

A lot of times, given a high frequency of placement moves, school can be the only stability a looked after child has and key to this are the relationships formed both with their peers and members of staff –The DE/DoH draft Looked After Children's Strategy has a central tenet of ensuring stability is prioritised for looked after children, both in terms of their home and school placements.

D Children and Young People's Services

Given the numbers involved it would be anticipated the financial implications for the transport budget would not be significant.

E School Access Team (SAT)

Background

Drumsallen Primary School (PS) is a Controlled primary school with approved admissions and enrolment numbers set at 13 for admissions (to a maximum of 16 provided the enrolment number would not thereby be exceeded) and 93 in enrolment. DP 609 proposes that the school should close from 31 August 2020 or as soon as possible thereafter.

Temporary Variation

If a school receives more applications than it has places available it can request a TV to its admissions and/or enrolment number from SAT. Drumsallen PS has been undersubscribed for several years in both its admissions and enrolment numbers and therefore TVs have not been requested or required.

F Investment and Infrastructure Directorate

Estate Operations Team Comments

As the proposal is for closure there are no accommodation needs at Drumsallen Primary School. The case for change indicates that there is capacity to

accommodate the 22 P1-P6 pupils currently enrolled at Drumsallen at the nearby local schools within the Controlled sector.

The case for change however notes that some minor additional accommodation may be required at the local schools but that “this will only be identified as the consultation progresses through parental choice in the location of a preferred local school.” No accommodation templates were attached to the Case for Change but, as it was noted that there is capacity to accommodate additional children at nearby schools, it is unlikely that additional minor works at the other schools would be approved.”

G Equality Unit

I have no comments to make other than noting that an Equality Screening of the proposal has been carried out and the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate) have been considered.

H Promoting Collaboration, Tackling Disadvantage Directorate

Shared Education and Community Relations Team

Shared Education is well developed in the local area with 10 of the 11 local schools (including Drumsallen PS) involved in Shared Education through the CASE⁴ project.

EA recognised its duty in respect of Shared Education and discussed the potential for Shared Education within the area, complying with its duty under Article 6 of the Shared Education Act (Northern Ireland) 2016. It concluded that that a shared solution would not improve the sustainability of Drumsallen Primary School.

Shared Education was not referenced in the pre-publication responses or in any of the 2 month objection period responses.

⁴ Collaboration through Sharing in Education