SECTION 6

Copy of Published Development Proposal

Appendix I

EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL NO 673

ST ANNE'S PRIMARY SCHOOL, DONAGHADEE

Notice is hereby given that a Proposal under Article 14 of the Education and Libraries (Northern Ireland) Order 1986 has been submitted to the Education Authority by the Council for Catholic Maintained Schools on behalf of the Trustees of St Anne's Primary School, Donaghadee to the effect that:

St Anne's Primary School, Donaghadee will discontinue with effect from 31 August 2022, 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, Grahamsbridge Road, Dundonald, Belfast, BT16 2HS, 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



ST ANNE'S PRIMARY SCHOOL DONAGHADEE

SCHOOL REF: 403-3008

CASE FOR CHANGE

SEPTEMBER 2021

(New information added 19 January 2022

See page 7)

CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

EA AREA	Ards and North Down District Council
DP NUMBER	DP 673
PROPOSER	Council for Catholic Maintained Schools, Linen Hill House, 23 Linenhall Street, Lisburn, BT28 1FJ
SCHOOL(S) NAME	St Anne's Primary School, Donaghadee
SCHOOL REFERENCE	403-3008
TYPE	Primary School
MANAGEMENT	Catholic Maintained
DP PUBLICATION DATE	Week commencing 17 January 2022
PROPOSAL	Proposal to discontinue St Anne's PS, (403-3008) with effect from August 2022 or as soon as possible thereafter.

STATUTORY CONSULTATION

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

PROPOSER

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 nonteaching) should be consulted as well as pupils

Original proposal was for the discontinuance of St Anne's Primary School with effect from 31 August 2021 or as soon as possible thereafter.

I confirm Pre-publication consultation commenced with St Anne's PS at meetings with the Board of Governors (BoG), staff and parents/guardians on 27 February 2020. Following the meetings, CCMS agreed to delay the dissemination of this pre-publication booklet to staff, governors and parents/guardians in order to incorporate feedback from the BoG. On 18 March 2020, as a result of the Coronavirus pandemic, the First Minister and Deputy First Minister announced that schools would close to pupils at the end of the school day on 20 March 2020. This resulted in area planning activity being stood down. CCMS communicated to the school that the preconsultation would resume through the issuing of the booklet with stakeholders (staff, BoG and parents/quardians) when further clarity was received on the area planning process moving forward. Area planning activity was given permission to resume by the Department of Education on 8 October 2020, as a result, CCMS re-started the prepublication consultation and it ran from 3 June 2021 – 2 July 2021. All

Summary and assessment of views received – how were these taken into account before the publication of the DP?	responses received by CCMS ahead of the stalling of the prepublication consultation were carried forward as applicable. The responses were given due consideration at CCMS' Education Provision Committee meeting on 15 September 2021. It was determined by CCMS the proposal was appropriate, taking into account all responses received. A copy of the consultation summary is contained in Appendix F.
Confirmation by the Proposer	I confirm: St Anne's PS Board of Governors, staff and parents/guardians were consulted; 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. NAME: Edel Teague OFFICE HELD: Area Planning Programme Manager SIGNED: DATE: 30/09/2021

ASSOCIATED PROPOSALS

DP XXX	None
Published DD/MM/YY	

Case for Change: Statutory Consultation

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

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

The Education Authority (EA)

I confirm that the schools which the Education Authority consider might be impacted by this proposal were consulted on 8 October 2021 with a return date of 12 November 2021.

Name:	Michele Corkey
Office Held:	Director of Education
Signed:	Michael Coekay
Date:	4 January 2022

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.

Summary of views received (number of responses, recurring themes, petitions, community support or opposition).

Responses/Assurances in respect of issues raised during consultation.

Dates of EA meetings eg Education Committee/ Board etc.

<u>Details of issues raised by</u> members of EA Board In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 8 October 2021 to schools which, in the opinion of the Education Authority, might be affected by the proposal. A total of 42 local schools were forwarded correspondence. Comments were invited from Boards of Governors and Trustees, to be returned to the Education Authority by 12 November 2021.

Five responses were received from affected schools. All do not support the proposal.

Donaghadee PS, St Finian's PS, St Malachy's PS, Ballyvester PS and Greyabbey PS - Do not support the proposal

The information below provides a summary of overall responses and emerging themes of responses received.

- Donaghadee Primary School is reported as having an enrolment number of 466. The Department of Education has agreed a development proposal to reduce this to 420 from September 2022. As Ballyvester PS is full and our spare capacity will be reduced by 46, there is limited capacity in the immediate area.
- The distance of approximately 7 miles to access a faith school is prohibitive.
- Building works in the local area are expanding with a couple of developments projected to deliver 400 houses in the next 2-3 years.
- Our school, Donaghadee Primary School site is landlocked with little prospect of expansion.

- The provision of Catholic Education in Donaghadee is effectively being removed. The loss of the Catholic School in the town would disadvantage those who seek faith based education for their children
- Suggestions in the draft Development Proposal that our school could accommodate pupils from St Anne's Primary School are couched in terms of the distance of this school from other schools. The distance from St Anne's Primary School to St Finians Primary School is 7.8 miles and 7.1 miles from St Malachy's PS, and likely travel times to be in excess of 30 minutes in morning traffic.
- St Anne's Primary School is an integral part of the Bangor Parish Family of schools – a group set up in 2015 to share resources, staff development, and to improve the educational experiences of all pupils within a sustainable Parish solution.
- The closure of St Anne's leaves an enormous local gap in Shared Education opportunities for staff and pupils.
- St Anne's is a feeder school to St Columbanus' College in Bangor, so any closure would have a negative effect on their enrolment and potentially limit the availability of Catholic Post-Primary education in the area.
- With this Development Proposal, the provision of Catholic Education in Donaghadee is effectively being removed. When the previous Education Minister, Minister Weir, addressed the NI Assembly on 17/10/16 he stated "I think it would be unrealistic in certain situations to see a school of one type close and there being quite a distance to a school of a similar type. On the matter of parental choice, we should not leave schools in any of the sectors where the removal or closure would effectively deny that parental choice".
- With reference to the above statement from Minister, the loss of the Catholic School in the town would disadvantage those who seek faith based education for their children
- Ballyvester Primary School has had a long-standing link with St Anne's Primary School (30 years) through the Shared Education Programme. Our pupils and staff have taken part

in shared lessons where they have explored diversity, mutual respect, friendship and difference. This has had a very positive effect on the relationships within our school and wider community. If St Anne's Primary School closes, we will lose this cross community link and our Shared Education work will cease. This will also mean our pupils will miss the opportunity to develop relationships with children from a different background and establish mutual respect.

- It is unfair on a school to measure it against the Area Planning criteria when we have been and continue to be significantly and adversely affected by the ongoing Covid Pandemic.
- There remain far smaller schools in other areas of Northern Ireland which do not have a local population available for their intake.

This development proposal was discussed by the Education Authority's Strategic Planning and Policy Committee at its meeting on 4 January 2022.

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:	Michele Corkey
Office Held:	Director of Education
Signed:	Michele Corkey
Date:	4 January 2022

The Education Authority supports the Council for Catholic Maintained Schools in taking forward Development Proposal No 673 to discontinue St Anne's Primary School, Donaghadee with effect from 31 August 2022, or as soon as possible thereafter.

However, the Education Authority has concerns over the lack of suitable alternative provision in the area and would encourage the Council for Catholic Maintained Schools to engage, assuming the proposal is approved, with the parents of children in attendance at St Anne's Primary School at the earliest opportunity in other to assist them in accessing suitable provision.

In consideration of the above, and the Case for Change, the Education Authority is proposing to publish Development Proposal No 673 the week beginning 17 January 2022.

Note of content updates

No.	Date	Page/Section	Note on Update
1.	19 January '22	Section 3.3.1 (Page 15) & Appendix D and E	The financial plan (2021-24), signed off by the Education Authority's LMS on 24 November 2021 is displayed in Table 7 and included in Appendix D. This replaces the financial plan (Appendix E) that was used during the prepublication consultation (3 June 2021 – 2 July 2021) & 'affected schools' stage (8 October – 12 November).
2.	19 January '22	Section 4.2 (Page 19)	Information relating to St. Anne's PS vote to transform to controlled integrated status and the school's plan to submit a development proposal has been inserted.
3.	19 January '22	Section 5.1 (Page 22) & Section 5.4 (Page 23)	Financial information has now been updated as per financial plan 2021-24.

1. BACKGROUND

St Anne's Primary School (PS) is situated in Donaghadee, 6.7 miles from Bangor and 8.2 miles from Newtownards. It is populated in the main by pupils from families residing in the immediate area. Figure 1 below, indicates the location of the school and the pupil distribution (2020/21) within the area. Most of the pupils live within a 3-mile radius of the school with a small number of pupils living beyond a 5-mile radius. The Education and Training Inspectorate's Report September 2018 states that: "While most of the children attending the school come from the locality, a small number travel from a wider catchment area." Distances to schools within a 9 mile radius of St Anne's PS is noted in table 8 (p. 13).

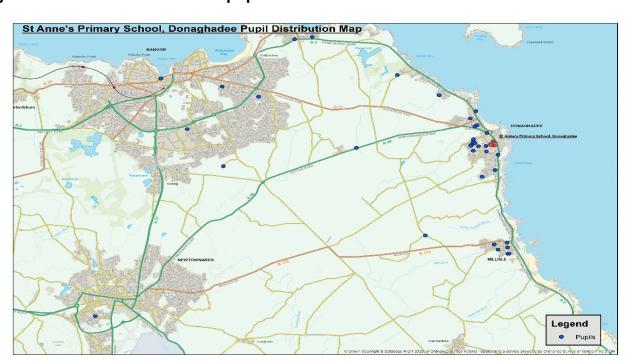


Figure 1 Location of school and pupil distribution

The school is situated in the Donaghadee South 2 SOA (Super Output Area) which has a multiple deprivation measure of 597 and an education, skills and training deprivation measure of 385. In total there are 890 SOAs in Northern Ireland where 1 is the most deprived score and 890 the least deprived. The SOA rank for employment deprivation is 465. The DE Census 2020/21 shows that 26 pupils (53%) are entitled to free school meals. There are 13 pupils on the special educational needs register (Stages 1-5) with four of these pupils statemented (Stage 5).

Schools for the Future: A Policy for Sustainable Schools 2009 (SSP),² underpins all work carried out through the area planning process. The aim of area planning is to facilitate the development of a network of viable and sustainable schools that can deliver the Northern Ireland (NI) Curriculum³ effectively and provide access to education provision appropriate to the needs of pupils.

In striving to realise this aspiration, the area planning process aims to ensure every pupil has:

access to a broad and balanced curriculum with opportunities to realise their potential;

¹ https://www.education-ni.gov.uk/publications/schools-future-policy-sustainable-school

² https://www.education-ni.gov.uk/articles/area-planning-frequently-asked-questions

³ https://ccea.org.uk/learning-resources/northern-ireland-curriculum-primary

- an education in which the learning outcomes are appropriate to their needs;
- access to quality teaching delivered in a caring and supportive environment; and
- education delivered in modern, well-resourced facilities, suitable for the delivery of education in the twenty-first century.

CCMS is committed to excellence in the delivery of education so that every pupil can realise their potential and contribute to a caring, inclusive and progressive society.

The Education Authority (with CCMS) published *Providing Pathways Strategic Area Plan for School Provision 2017-2020* on 28 April 2017 which included the *Annual Action Plan for Primary, Post-Primary and Special Schools, April 2017–March 2018, April 2018 – March 2019 and April 2019 – March 2021.* When reviewing the requirements for the Action Plan 2019/21, in line with the SSP, it was agreed to include St Anne's PS in the Annual Action Plan as noted in Table 1.

Table 1: Extract from Annual Action Plan 2019/214

St Anne's PS A 9 Millisle Road w	Key Issue Address school provision where sustainability is an	Action Managing authority to consult on options for future provision of
.	ssue	St Anne's PS by May 2020

At the March 2019 meeting of CCMS' Education Provision Committee, it was agreed to initiate consultation to examine future provision at the school. CCMS officers met representatives of the school to assess the school's sustainability and identify any sustainable options available in the area. This Case for Change document provides a summary of the sustainability assessment and any options identified.

⁴ https://www.eani.org.uk/school-management/area-planning/annual-action-plans.

2. SUPPORTING STATISTICS TO EXPLAIN/HIGHLIGHT THE EVIDENCE OF NEED FOR CHANGE

2.1 Historic Enrolments

The approved enrolment number for St Anne's PS is 76 and its approved admissions number is 11. As Table 2 and the accompanying text below indicates, the pupil enrolment in the school was 29 in 2011/12 and is 51 (census data in table 2 and data provided by school in text below table) in 2020/21. Between 2011/12 and 2021/22 the enrolment has fluctuated between 29 and 51. There is no indication the enrolment in St Anne's PS will increase substantially so as to reach the threshold of 105 pupils required by the Department of Education's (DE's) SSP, 2009.⁵

Table 2: Enrolment statistics Source: DE Census

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Total (Y1-Y7)
2011/12	3	3	5	4	6	3	5	29
2012/13	13	8	5	4	4	4	3	41
2013/14	10	11	7	7	5	5	5	50
2014/15	5	8	13	6	6	6	5	49
2015/16	5	4	7	12	6	6	5	45
2016/17	10	4	2	8	10	3	4	41
2017/18	5	10	3	3	10	9	3	43
2018/19	9	4	15	2	2	11	7	50
2019/20	7	10	4	14	1	2	11	49
2020/21	13	5	9	4	14	1	3	49

^{*} Enrolment figure includes supernumerary pupils (pupils with a statement of Special Educational Needs).

The statistics show the school's enrolment has remained below the sustainability minimum over the last 10 years. Although the DENI Census (2020/21) indicates an enrolment of 49 pupils for 2020/21, information provided by the school shows an enrolment of 51 pupils (Yr 1-7) with 13 pupils entering Yr 1 in 2020/21. Two pupils have joined the school since the DE Census was submitted (1 to P2 and 1 to P7 for 2020/21). Data received from the EA indicates that St Anne's PS received two 1st preference applications for 2021/22 academic year. The school has indicated, as below, that it has 51 pupils for 2021/22 with three pupils in Yr 1.

.7().	21/22	3	13	6	10	4	14	1	51	l
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The DENI Census shows that the school had one reception pupil for 2020/21. Reception pupils are children who are aged four at the date of their admission, but who are not yet of compulsory school age (i.e. children whose fourth birthday is after 1 July in a year). DE only considers Years 1-7 pupils in their enrolment SSP criterion. From September 2021, St Anne's PS no longer has a Reception Class.

2.2 Population Change

The Northern Ireland Statistics and Research Agency (NISRA) indicate a projected population reduction of children aged 0-15 years of 9% between mid-2018 and mid-2028 within the Ards and North Down Local Government District (LGD) area. In addition, they predict the population

⁵ Schools for the Future: A Policy for Sustainable Schools 2009 p24.

⁶ https://www.education-ni.gov.uk/publications/school-enrolment-school-level-data-202021.

of 4-11 year olds, in the Ards and North Down LGD, will decrease by 14.4% (mid-2018 to mid-2028).⁷

Table 3, 4 and 5 below shows the birth rates for the former electoral wards of Donaghadee South, Donaghadee North and Millisle (per academic year) over the 10 years 2008-2018 where the majority of pupils live. The current 5-year average birth-rate for the above wards is 28.4, 28 and 49.2 per annum respectively.

Table 3:	Table 3: Births by Donaghadee South Ward – Live Birth Statistics													
Births by Ward	Births by Ward 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 average													
	31	22	16	39	23	33	31	29	25	30	29	28.4		

Table 4:	Table 4: Births by Donaghadee North Ward – Live Birth Statistics														
Births by Ward	Births by Ward 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 average														
	31	26	28	27	21	40	24	25	27	28	36	28			

Table 5:	Table 5: Births by Millisle Ward – Live Birth Statistics													
Births by Ward														
	64	53	54	47	54	60	51	60	44	51	40	49.2		

The data above (enrolment trends, live birth statistics and population projections) are not an exact predictor of the actual number of children likely to enrol in a school. Some children may leave the area before reaching primary school age, some born outside the area may take up residence in the area and some may enrol in a primary school outside the area. However, consideration of variations in such data is helpful in predicting likely trends in future enrolments in a primary school.

2.3 Quality of Accommodation

The present St Anne's PS was officially opened in 1963 and replaced St Anne's Public Elementary School opened by the Sisters of Mercy in 1932. As per the schedule of accommodation (Appendix B), there are four permanent classrooms, one of which is currently being used as a staffroom. The Minor Works Report is contained in Appendix C. The school has had ongoing refurbishment with upgrades to lighting, security, energy efficiency and toilet refurbishment carried out between 2013 and 2017.

⁷ https://www.ninis2.nisra.gov.uk/InteractiveMaps/Population/PopulationProjections/atlas.html.

3. SUSTAINABILITY ASSESSMENT

The SSP sets out six sustainability criteria, and associated indicators, which are identified as the key references for assessing existing education provision to ensure it adequately meets the needs of pupils.⁸ Information about St Anne's PS is noted below for each of the criteria.

3.1 Quality Educational Experience

3.1.1 Composite Classrooms and number of teachers

The SSP indicates the following criteria for a sustainable school: "No more than two composite year groups in a single classroom at primary school level. A minimum of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers."

Table 6 shows how classes are managed by St Anne's PS, showing neither indicator is met.

Table 6: Composite classes for 2021/22 (Source: St Anne's PS)

Classroom	Number of pupils 2020/21: 51 (Yr 1-7)	Year Group	Number
Classroom 1	Foundation Stage	Year 1	3
		Year 2	13
Classroom 2	Key Stage 1	Year 3	6
		Year 4	10
Classroom 3	Key Stage 2	Year 5	4
		Year 6	14
		Year 7	1

The SSP section on Educational Experience for Children (p20) contains the following comments:

Teachers in small schools face problems of having less scope for professional interaction and mutual support. The school is unlikely to provide a wide programme of extra-curricular activities and will have a smaller range of teacher specialisms e.g. music.

The smaller numbers of children in each year group limit the opportunities for working alongside peers, social interaction and challenge, and participation in extra-curricular activities including team-based experiences.

The ETI Chief Inspector's Report 2014-2016 (p11) comments:

When the composite class spans more than two year groups, ensuring adequate progression in learning and planning to meet individual needs across a wider range of abilities and stages of development can be more challenging for the teacher. It may also limit opportunities for the children to develop socially and emotionally with those of a similar age and stage.

⁸ https://www.education-ni.gov.uk/publications/schools-future-policy-sustainable-schools.

⁹ Schools for the Future – A Policy for Sustainable Schools (DENI 2009) p47.

The ETI inspection (September 2018) commented on 'the very effective classroom management of differentiated learning within composite classes.' 10

3.1.2 The standards and the quality of learning and teaching at the school

The key findings of an ETI inspection report, published October 2018, are shown below:

Key findings of ETI Inspection 2018¹¹

Overall Effectiveness	High level of capacity for sustained improvement
Outcomes for learners	Very good
Quality of provision	Very good
Leadership and management	Very good
Reception provision	Good

Outcomes for learners

The children progress very well in their talking and listening, reading and writing as they move through the key stages, commensurate with their abilities and stage of development. Their written work is well-organised and presented neatly; they enhance the presentation of their ideas through the creative use of information and communication technology (ICT), drama and music. They write in a variety of forms showing a progressively skilful understanding of purpose and audience. The children transfer their literacy skills and organisational skills to a wide range of practical, open-ended activities across the curriculum.

In discussion with a group of children from year 7, they spoke enthusiastically about their favourite books and authors and expressed their enjoyment of reading. They read aloud confidently and provided clear explanations of a range of strategies they use to work out the meaning of unfamiliar words. The children explained how they use their literacy skills to present information to a larger audience during assemblies and in school productions.

The children work independently and collaborate maturely in groups and pairs; they enjoy sharing their ideas with others and, from a young age, listen and respond respectfully to the views of others. The children carry out roles and responsibilities, such as, 'playground buddies' and as members of the School- and Eco-councils, with pride and have very positive attitudes towards their learning.

The small number of reception children are well settled and motivated in their learning through play both indoors and outdoors. They explore confidently the wide range of activities available and talk enthusiastically about their experiences to the staff and the other children.¹²

Quality of Provision

The broad and balanced curriculum is enriched by the wide range of additional opportunities experienced through the Shared Education partnership and extra-curricular activities. These include, for example, detailed written recounts of visits to places of interest, joint poetry sessions and the 'Knit n' Natter' Intergenerational project. Literacy is developed effectively in a holistic and creative manner across all areas of the curriculum.

The staff understand well the children's varying needs and use this information effectively alongside a range of assessment data to track systematically their progress and tailor their planning effectively to support individual needs.

All of the lessons were good or better; with two-thirds being very good. Key features of this practice include: the very effective classroom management of differentiated learning within composite classes; the skilful adult interaction and effective questioning used to promote language and learning; the connections in the children's learning across the curriculum; and, the well embedded integration of ICT to support learning and teaching.

Effective guidance and support for those children who require additional support with aspects of their learning is well-planned and implemented to bring about high quality individual learning experiences. The children's literacy skills and their social and emotional development improve as a result of this support.

¹⁰ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.3

¹¹ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down

¹² https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.2

The learning experiences for the reception children are planned in line with the Curricular Guidance for Preschool Education2 and their progress is tracked effectively. The wide range of play-based activities, available both indoors and outdoors, are enhanced by the skilful interactions of both the teaching and support staff. There are limitations to the freely chosen learning opportunities and the social interactions for the reception children when the length of their day is extended and the foundation stage children require more sustained periods of adult-focused learning and teaching. Based on the evidence available at the time of the inspection, the school's approach to the care and welfare of the children impacts positively on learning, teaching and outcomes. In discussion with the inspectors, a group of year 6 children talked enthusiastically about their caring and friendly teachers, their support for one another and their role in helping to create an inclusive and welcoming ethos for everyone.¹³

Safeguarding

Based on the evidence available at the time of the inspection, the arrangements for safeguarding children reflect the guidance from the Department of Education. A group of children from year 6 report that they feel safe in the school and that they are aware of what to do if they have any concerns about their safety or welfare.

Overall Effectiveness

St Anne's Primary School has a high level of capacity for sustained self-improvement in the interest of all learners. The ETI will monitor how the school sustains improvement.

3.1.3 The quality of the physical environment for learning and teaching

The school is constructed on a site of 3200 sqm, has a Limit of Internal Accommodation (LIA) of 245sqm (Appendix B).

3.1.4 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

The 2018 ETI report assessed the quality of provision as being "very good". The Report of the Inspection in September 2018, included the following comments: 'The leadership and management promote a shared vision for high standards, excellent pastoral care and individualised support for every child within a caring and inclusive school environment.'14

3.2 Enrolment Trends

3.2.1 The enrolment trends in the school in the past three years and projected demand in the area

CCMS is of the view there is insufficient evidence of an increase in demand to meet the sustainability enrolment threshold. Table 2 demonstrates the enrolment figures remain consistently below the number of 105 contained within the SSP, ranging from 29 in 2011/12 to 51 in 2020/21 and now 51 in 2021/22 with three pupils in Yr 1. In the Ards and North Down LGD the number of children from 4 to 11 years is set to decrease by 8.6% from mid-2016 to mid-2026. The Board of Governors have provided evidence of new houses being built in the area, and planning for future house building.

3.3 Financial Position

3.3.1 The school's annual finances

All schools receive delegated budgets and have the authority to determine expenditure from these budgets. Guidance for controlled and maintained schools requires that they should not accumulate surpluses or deficits in excess of 5% of their delegated budget or £75,000, whichever is the lesser.

¹³ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.2-3

¹⁴ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.3

A copy of the Annual Area Profile 2020 for St Anne's PS is attached at Appendix A. Table 7 below provides information from the school's 3-year financial plan 2021-24¹⁵ (included in Appendix D). The plan indicates the school will be in surplus at the end of the 2023-24 financial year (11.5%). These calculations are based on pupil enrolments of 50 in October 2021, 59 in October 2022 and 55 in October 2023 (Yr 1-7). Any reduction in projected pupil enrolment would impact on the projected financial position.

Table 7: Financial Position - School Financial Plan 2021-24

Year	2021 – 22	2022 - 23	2023 – 24
Anticipated Enrolment (In Financial Plan)	50	59	55
Total Budget	£256,606	£256,606	£280,426
Total Expenditure	£245,912	£246,869	£251,884
Closing Balance	-£5,422	£4,315	£32,856
% Deficit	-2.3%	1.7%	11.5%

The ETI Inspection report from September 2018 included the following comments. 'It will be important that the employing authority, school 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 staff.' 16

3.4 Leadership and management by boards of governors and principal

The ETI Inspection Report noted the following.

Leadership and management:

The leadership and management promote a shared vision for high standards, excellent pastoral care and individualised support for every child within a caring and inclusive school environment. In addition, the very effective links and partnerships with other schools and the local community provide the leaders, staff and children of this smaller school with the benefits of being part of a larger community of learners.

The co-ordinators work collegially to provide consistent, whole-school and cross-curricular approaches to the improvement process. There are clear and agreed systems in place for monitoring and evaluating learning and teaching and regular sharing of practice among staff.

The school development planning process is informed by regular consultation with staff, children and parents and the analysis of a range of relevant data and teacher knowledge to identify relevant key priorities for future action. There is evidence of ongoing improvement in the quality of the learning experiences for the children and the teachers' ongoing professional development through their engagement in the Shared Education partnership and through the professional exchange within the wider Bangor Parish Family of Schools.

3.4.1 Composition of Board of Governors

The Board of Governors benefits from a wide range of skills and includes the school principal and representation from parents/guardians, teachers, Trustees, and the Department of Education.

¹⁵ Financial plan (2021-24) (Appendix D) replaces financial plan 2020-23 (Appendix E)

¹⁶ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.4

The ETI inspection Report September 2018 noted the following.

Based on the evidence available at the time of inspection, the ETI's evaluation is that there can be a high degree of confidence in the aspects of governance evaluated. The governors are well informed and understand their role in the school improvement process. They support and challenge, as appropriate, the principal and staff and make a meaningful contribution to the life and work of the school.

It will be important that the employing authority, school governors and the staff continue to 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. ¹⁷

3.5 Accessibility

The school is accessible to the pupils in the local area. There are also a number of other accessible suitable schools in the area.

3.5.1 Distance to another suitable primary school and capacity in nearest schools Table 8 below shows the available spaces in the schools closest to St Anne's PS. There is capacity within the majority of local schools.

Table 8: Local schools within 9 miles of St Anne's PS¹⁸(Source: DE Census 20/21, DE

Schools + & google maps)

	Distance from St Anne's PS	Sector	Enrolment 2020/21*	Approved Enrolment No 2020/21	Unfilled Places **2020/21
St Comgall's PS, Bangor 403-6146	6.6 miles	Catholic Maintained	306	290	0
St Malachy's PS, Bangor 403-6148	7.1 miles	Catholic Maintained	369	437	80
St Finian's PS, Newtownards 403-3017	7.8 miles	Catholic Maintained	170	233	!
Donaghadee PS 401-1654	0.5 Miles	Controlled	388	466	89
Ballyvester PS, Donaghadee 401-1265	1.7 miles	Controlled	111	109	!
Millisle PS, 401-1681	2.4 miles	Controlled	192	225	45
Kilmaine PS, Bangor 401-6192	4.8 miles	Controlled	616	610	16
Ballymagee PS, Bangor 401-6430	4.9 miles	Controlled	404	406	16
Towerview PS, Bangor 401-6111	4.9 miles	Controlled	408	406	23
Carrowdore PS 401-6020	5.0 miles	Controlled	167	194	34
Ballyholme PS, Bangor 401-1650	5.1 miles	Controlled	625	630	20
Bloomfield PS, Bangor 401-3023	6.0 miles	Controlled	409	408	23
Bangor Central Integrated PS, 405-1680	6.3 miles	Controlled Integrated	550	618	79
Abbey PS, Newtownards 401-6399	6.6 miles	Controlled	557	610	74
Grange Park PS, Bangor 401-3045	7.0 miles	Controlled	405	402	0
Clandeboye PS 401-1670	7.1 miles	Controlled	347	406	69
Castle Gardens PS, Newtownards 401-1462	7.3 miles	Controlled	318	406	137

¹⁷ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.3-4

¹⁸ https://www.education-ni.gov.uk/topics/statistics-and-research/statistics.

Loughries Integrated PS, Newtownards 405-6710	7.3 miles	Controlled Integrated	86	102	!
Ballywalter PS, 401-1566	7.4 miles	Controlled	177	199	!
Victoria PS, Newtownards 401-1646	7.5 miles	Controlled	532	592	71
Kilcooley PS, Bangor 401-6002	7.7 miles	Controlled	149	205	83
Rathmore PS, Bangor 401-6067	7.8 miles	Controlled	580	600	34
Londonderry PS, Newtownards 401-6004	8.3 miles	Controlled	412	406	7
Crawfordsburn PS, 401-1645	8.4 miles	Controlled	207	221	22
Newtownards Model PS, 401-1345	8.5 miles	Controlled	403	406	10

^{*} The enrolment figure includes supernumerary pupils.

3.6 Links with the community

A recent ETI inspection report made the following comment: 'The very effective links and partnerships with other schools and the local community provide the leaders, staff and children of this smaller school with the benefits of being part of a larger community of learners.' 19

St Anne's PS is a Catholic maintained school with a long tradition of educating children from different faiths. They work in close partnership with pupils, parents/guardians, governors, parish and the local community. The school participates in a longstanding shared education programme with Ballyvester Primary School and the ETI report makes the following observations: 'There is evidence of ongoing improvement in the quality of the learning experiences for the children and the teachers' ongoing professional development through their engagement in the Shared Education partnership and through the professional exchange within the wider Bangor Parish Family of Schools.'

The school operates a number of clubs for all age groups including football, handball, basketball, tennis, Monkeynastix, music, drama, STEM, creative arts, play, etc. The school has an association with various after-school providers, outdoor pursuit providers and is involved in various wider school events and team competitions. St Anne's PS also has a wider involvement in community partnerships and events in Donaghadee, intergenerational projects and links with local businesses.

^{**} When calculating the unfilled places, DE excludes supernumerary pupils from the calculation. Consequently, when unfilled places are added to enrolment, it will not match approved enrolment number.
! denotes figures to avoid possible identification of individuals.

¹⁹ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.3

4. AREA PLANNING IMPACT

4.1 Outline the Area Planning context and how this proposal will contribute to the delivery of education provision within the area. How does the proposal align with the current Area Plan, its key strategic themes and actions outlined in the Annual Action Plan?

The DE's vision in the SSP 2009 is for an educationally sustainable schools estate planned on an area basis, with a focus on sharing and collaboration.²⁰ The annual action planning process provides a framework for early consideration of emerging problems and possible remedial action to address questions of sustainability. The primary objective of the SSP policy is to ensure that all pupils get a first-class education in fit for purpose facilities, regardless of background or where they live. It focuses on the long-term viability of educational provision making best use of the resources available for education. This policy drives the area planning process to ensure there is a network of strong, viable schools to meet the educational needs of pupils.

In October 2016, with the publication of the draft Education Authority's *Providing Pathways - Strategic Area Plan for School provision 2017-2020*, the then Minister for Education made a statement that included the following.

The Sustainable Schools Policy, which is implemented through the Area Planning process, focuses on providing children and young people with high quality education that meets their needs and enables them to achieve their full potential.

The educational experience of our children and young people is greatly enhanced when they attend schools that are educationally and financially viable. The Sustainable Schools Policy is a framework for assessment of the sustainability of primary and post-primary schools. The six criteria and supporting indicators clearly illustrate what a sustainable educational experience should look like. Schools must: deliver a broad and balanced curriculum, offer extensive extracurricular activities, have high quality pastoral care systems and have the confidence of the communities they serve.

In primary schools' pupils should be in a class with no more than two year groups but ideally they should be in single year group classes. They should be able to interact with peer groups and have the best chances to prepare for successful transition to post primary school.

However, there are still a significant number of schools that are struggling, for a wide range of reasons, to deliver the best for their pupils. This is particularly evident in the primary sector and, despite the best effort of teachers, it becomes harder to deliver a high-quality education if pupils are taught in composite classes. We have too many small primary schools with more than two-year groups in a single class.²¹

CCMS has a statutory duty to promote and co-ordinate, in consultation with Trustees, the planning of Catholic maintained schools. CCMS, in taking forward the Action Plan for Primary, Post-primary and Special Schools April 2019 – March 2021, identified a key issue for St Anne's PS to 'address school provision where sustainability is an issue' with the action 'Managing authority to consult on options for future provision of St Anne's PS by May 2020.'

²⁰ https://www.education-ni.gov.uk/articles/sustainable-schools.

²¹ https://www.theyworkforyou.com/ni/?id=2016-10-17.5.1
Ministerial Statement on Draft Area Plan - 17 October 2016.

4.2 Specify links to other proposals. Provide detail on other DPs (including those in planning and not yet published) that could impact on education provision in the area, affecting consideration of this proposal and outline any reason for not bringing them forward together.

There are no other links with other proposals, however this proposal was discussed at the Area Planning Local Group with sectoral partners to ascertain if there were any other proposals for the area or any alternative area solutions prior to adding the school to the Annual Action Plan.

The school informed CCMS 16 December that following a parental ballot (which took place 8 December 2021) the Board of Governors plan to submit a development proposal with regards to transformation to integrated status from September 2023 (or as soon as possible thereafter). The Minister will consider the transformation development proposal alongside this proposal from CCMS.

4.3 What other options/size were explored and why was this the most appropriate area solution?

The alternative options explored at the consultation stage are listed below.

4.3.1 Do nothing - maintain the status quo

This option would result in no change to the current provision. Composite classes of more than two year groups would be retained.²²

4.3.2 Cross-sectoral options

(i) Shared education option

St Anne's PS is in a shared education partnership with its neighbouring controlled school, Ballyvester PS and pupils engage in shared curricular/extra-curricular activities. However, these activities do not provide the basis for sustainable provision.

(ii) Shared campus option

DE's Shared Campus capital programme allowing schools to be built on a new shared campus, whilst retaining their own individual identity, structure and governance, notes that individual schools must be sustainable in order to participate.

(iii) Jointly managed school option

A jointly managed faith school is where a school is established by two or more faith groups. No jointly managed faith options were available to address the sustainability challenges identified.

4.3.2.2 Integrated school option

Integrated education "brings pupils and staff from Catholic and Protestant traditions, as well as those of other beliefs, cultures and communities, together in one school."²³ No integrated school options were available to address the sustainability challenges identified.

4.3.3 Amalgamation

²² CCMS notes the school has indicated their School Development Plan (2021-2024) envisages having 4 composite classes by 2024, 'or earlier if possible'.

https://www.ief.org.uk/wp-content/uploads/2018/04/Options-for-Sharing-and-Integrating-A-Short-Guide-for-Schools.pdf Options for Sharing and Integrating: A Short Guide.

Amalgamation is the process whereby two or more schools, from the same sector (generally but not exclusively of a similar size), come together to create a sustainable school. An amalgamation must deliver a school of at least 105/140 pupils, that will retain this number at least, in the future. It is a process with both schools closing and a new school and management structure being created. There is no evidence schools in proximity to St Anne's PS could join with it to create a sustainable amalgamated school.

4.3.4 Federation

A federation involves schools in an area coming together either through a "soft federation" or "hard federation." Whilst there is no legal definition for a federation in Northern Ireland, the potential exists for one to be formed if it is educationally and financially sustainable. A "soft federation" is where two schools or more come together to create sustainable provision by sharing staff such as a principal. Each school retains its own governing body, own budget, with representatives on a joint committee. The schools could share common goals, joint committee recommendations but it would be up to the individual governing bodies to authorise decisions/plans.

A "hard federation" is where two or more schools from the same sector share a BoG. Each school would receive and retain their individual budgets. However certain costs could be shared.

It is not evident how a federated school within the local area would provide for a sustainable provision.

4.3.5 Discontinuance of St Anne's PS

When considering the future of St Anne's PS, there is no evidence any option can provide sustainable provision in the school. CCMS recognises the commitment of the governors and staff but the current challenging circumstances do not provide for a sustainable school. It is recognised that despite the school's best efforts, it continues to face sustainability challenges.

CCMS considers the proposal to discontinue provision at St Anne's PS would not impact significantly on other schools. Given the capacity in the area, any displacement of pupils can be managed within existing provision, based on current parental/guardian preference.

4.3.6 Conclusion

Pre-publication consultation commenced with St Anne's PS at meetings with the BoG, staff and parents/guardians on 27 February 2020. The purpose of the pre-publication consultation was to inform stakeholders of the challenges faced by the school. It was also to facilitate a meaningful discussion on CCMS' recommended option. It provided an opportunity for all stakeholders to present their views and contribute evidence to be considered as part of the process, including any alternative sustainable options. Following the meetings, CCMS agreed to delay the dissemination of this pre-publication booklet to staff, governors and parents/guardians in order to incorporate feedback from the BoG.

On 18 March 2020, as a result of the Coronavirus pandemic, the First Minister and Deputy First Minister announced that schools would close to pupils at the end of the school day on 20 March 2020. This resulted in area planning activity being stood down. CCMS communicated to the school that the pre-consultation would resume through the issuing of the booklet with stakeholders (teachers, BoG and parents/guardians) when further clarity was received on the area planning process moving forward. Area planning activity was given permission to resume by the Department of Education on 8 October 2020, as a result, CCMS restarted the pre-publication consultation 3 June – 2 July 2021. All responses received by CCMS ahead of the stalling of the pre-publication consultation were carried forward as

applicable. The summary of responses received during consultation meetings, and through the consultation period, is recorded in Appendix F.

Following consideration of all consultation feedback received, and having reviewed the options available, CCMS' Education Provision Committee approved the proposal to proceed with a development proposal for the closure of St Anne's PS. It was agreed the proposal would have effect from 31 August 2022, or as soon as possible thereafter. (Note: The effective date of the proposal was revised from 31 August 2021 to 31 August 2022). This was noted when the prepublication process re-started.

4.4 What is the potential impact on other schools, what account has been taken of this?

It is anticipated there will not be a significant impact on other schools in the area either maintained, controlled or integrated, given the low enrolment numbers in the school. St Anne's PS is made up of pupils from various community backgrounds. If a development proposal is approved, there are sufficient places available in other schools (as shown in table 8) in the Ards and North Down area to facilitate pupils from St Anne's PS.

In these circumstances a CCMS Education Adviser would liaise with St Anne's PS and schools to which the pupils would transfer and assist the pastoral aspect of the move. The receiving schools would facilitate parental/guardian visits, to ensure parents/guardians have the opportunity to familiarise themselves with alternative provision. There would be meetings with Special Educational Needs (SEN) co-ordinators, where appropriate, to facilitate SEN pupil transfers. Administration of admissions documentation would be required, including common transfer files.

5. RATIONALE FOR PROPOSAL

5.1 Explain the objectives of the proposal and the desired outcomes if approved – for example to reduce number of available places or to increase enrolment to meet demand. Detail how this aligns to Departmental policies and consideration given to Statutory Duties.

The Providing Pathways - Strategic Area Plan for School Provision 2017-2020 (Area Plan) addresses the objectives of the SSP and in particular it 'aims to ensure all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education.'24 This proposal addresses the sustainability issues at St Anne's PS, as determined by the DE SSP policy. The key sustainability criteria are addressed in Section 3 (p11-18). The following conclusions can be drawn from the assessments made.

Quality educational experience

St Anne's PS operates three-year groups in a single composite class at Key Stage 2.

Stable enrolment trends

St Anne's PS has, as detailed in Table 2, experienced an enrolment below the 105-minimum SSP threshold over the last 10 years. The current enrolment is 51 pupils, with 3 pupils enrolled in Yr 1, in the 2021/22 school year.

Sound financial position

The school's financial plan for 2021-2024 (Appendix D) indicates that the school will be in surplus at the end of the 2023/24 financial year (11.5%). These calculations are based on

²⁴ https://www.eani.org.uk/publications/providing-pathways-strategic-area-plan-2017-2020

pupil enrolments of 50 in October 2021, 59 in October 2022 and 55 in October 2023 (Yr 1-7). Any reduction in projected pupil enrolment would impact on the projected financial position.

Strong leadership and management by Boards of Governors and Principal

The ETI Report of 2018 noted the following about the school's leadership and management:

The leadership and management promote a shared vision for high standards, excellent pastoral care and individualised support for every child within a caring and inclusive school environment. In addition, the very effective links and partnerships with other schools and the local community provide the leaders, staff and children of this smaller school with the benefits of being part of a larger community of learners.²⁵

Based on the evidence available at the time of inspection, the ETI's evaluation is that there can be a high degree of confidence in the aspects of governance evaluated. The governors are well informed and understand their role in the school improvement process. They support and challenge, as appropriate, the principal and staff and make a meaningful contribution to the life and work of the school.²⁶

Accessibility

St Anne's PS is accessible for those who send their children there. A significant majority of the school's pupils live close to the school. As table 8 indicates, there are also accessible schools nearby.

Strong links with the community

As noted in section 3.6, the school gives high priority to maintaining a wide range of productive links with the parents/guardians and the local community.

Summary

The proposal to discontinue St Anne's PS recognises continuing with the status quo will perpetuate the challenges faced by the school. There is no evidence that as a Catholic maintained primary school it will be able to meet the following sustainability criteria: quality of the educational experience (due to low enrolments) and the minimum threshold for a rural school (105 pupils). Financial challenges may also increase if enrolment is not as projected.

5.2 Equality Duty

Equality screening of this proposal has been carried out. Section 75 of the Northern Ireland Act 1998: A Guide for Public Authorities advises: '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.' ²⁷

The evidence received to date suggests that there are no major impacts on the protected groups within Section 75 of the Northern Ireland Act 1998. The final screening document will be available when the proposal reaches the public objection period stage. It will be available on request from CCMS.

²⁵ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.3

²⁶ https://www.etini.gov.uk/publications/primary-inspection-st-annes-primary-school-donaghadee-county-down Report of an Inspection in September 18 p.4

²⁷https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf

Section 75 of the Northern Ireland Act 1998: A Guide for Public Authorities p7.

5.3 The United Nations Convention on the Rights of the Child (UNCRC)

Article 12 (1) of the UNCRC notes: 'Parties shall assure to the child who is capable of forming his or her views the right to express those views freely on all matters affecting the child, the views of the child given due weight in accordance with the age and maturity of the child.'28

CCMS' practice regarding consultation with primary school pupils is to request the professional staff in the school to conduct the consultations. This is because they have both the appropriate mechanisms and relationships for consulting young children on subjects that are sensitive. CCMS explained to St Anne's PS its practice regarding consultation with pupils. CCMS did not receive any pupil responses to the consultation.

5.4 Rural Needs Act 2016

Section 1(1) of the Rural Needs Act (NI) 2016 ('the Act') requires public authorities to have due regard to rural needs when developing, adopting, implementing or reviewing a policy, strategy or plan and when designing or delivering a public service.²⁹ Whilst the SSP rural enrolment threshold of 105 applies to the school as it is outside Belfast or Derry City, the population of Donaghadee at 6,780 (2017 – NISRA) places the town in Category E (Small Town) according to the classification set out for settlements in the Rural Needs Act. Therefore, CCMS is not obliged to take "due regard" of the terms of the Act in this case. However, CCMS did take this into consideration as outlined below.

A number of options were identified and this Case for Change document considers the potential of each option for maintaining primary provision in the area. These include, cross-sectoral options such as shared education/shared campus and other options such as federation, amalgamation and maintaining the status quo. There is no evidence any of these options could provide sustainable education provision in the school. The options above were presented as part of the consultation with staff, BoG, parents/guardians and pupils of St Anne's PS. This ensured information was received from the impacted stakeholders on all matters, including rural needs. Stakeholders highlighted the proposal to close St Anne's PS has the potential to impact the local community.

In determining whether to proceed with this proposal, due consideration was given to the balance between meeting the enrolment, educational and financial requirements of the SSP and removing provision.

At present, those who live within two miles of St Anne's PS are not eligible for transport assistance. This has the potential to restrict their ability to attend a school with fewer sustainability challenges. Table 8 shows that alternative suitable provision is located beyond 2 miles of St Anne's PS. If the proposal proceeds, there is transport assistance available for pupils that do not live within two miles of their nearest suitable school. This mitigates the impact of the closure of the school.

The intention of this proposal is to advance the aspirations, aims and objectives of the SSP: 'It is important that children in rural communities have access to a quality education in cost effective provision.'30

Feedback from the consultation notes St Anne's PS is a social hub for the local community. If the proposal was accepted, the school building and its premises will revert back to the trustees

²⁸ https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

The United Nations Convention on the Rights of the Child p5.

²⁹ https://www.daera-ni.gov.uk/articles/rural-needs-act-ni-2016-questions-and-answers.

³⁰https://www.education-ni.gov.uk/publications/schools-future-policy-sustainable-schools Schools for the Future – A Policy for Sustainable Schools (DENI 2009) p27.

who will be able to decide whether the building would remain accessible to the local community. CCMS would support the trustees as appropriate.

6. EDUCATIONAL IMPACT

6.1 What are the educational benefits of this proposal?

In a sustainable school, pupils benefit educationally because they are more likely to be:

- taught in single year group classes;
- able to have increased peer interaction;
- able to participate in a wide range of extra-curricular activities; and
- able to benefit from a wider range of specialist teachers.

6.2 Provision of high-quality education should be the desired outcome of all proposals - outline how this proposal aims to achieve this outcome.

If St Anne's PS were to cease provision, the pupils would be afforded the opportunity to enrol in sustainable schools which can ensure the following benefits.

- Greater opportunities for pupils to be taught in their own age groups.
- Increased number of classes of no more than two-year groups.
- Additional potential for appropriate levels of differentiation in teaching and learning.
- Increased opportunities for peer group interaction.
- Improved chances for participation in extra-curricular activities.
- Additional opportunities for specialist teaching and professional development of staff.

A sustainable school can allow for efficient use of educational resources including the deployment of teaching and support staff. It can also provide increased opportunities for the professional development of all staff as a larger staffing complement allows for increased interaction with peers and can facilitate more opportunities for training/development.

6.3 Outline how the proposal will benefit children and young people in the school(s) and in the area overall.

This proposal would benefit pupils as it will add to the longer-term viability of school provision. The SSP's primary objective is to ensure that all children get a first class education in fit for purpose facilities, regardless of background or where they live.³¹ This proposal would progress the development of a network of strong viable schools to meet the educational needs of pupils. Section 6.1 outlines the educational benefits that will be available to the pupils if they transition to a larger school.

6.4 Provide details of how the specific requirements of pupils with SEN will be catered for under the new arrangements.

If this proposal is approved, CCMS, in liaison with the EA and the schools involved, would ensure the following steps are taken.

- Assistance for pupils, as required, in managing the transition to a new setting.
- Continued appropriate placement for pupils with a statement of special educational needs, and assistance for these pupils in managing the transition to a new setting.
- Early and confidential transfer of statements and Personal Education Plans (PEP) to the new school.
- Consideration, as necessary, of the facilities and equipment required to support pupils with SEN.
- Consideration, as necessary, of Learning Support Centre provision where appropriate.
- Consideration, as necessary, of transport arrangements.

³¹ https://www.education-ni.gov.uk/articles/sustainable-schools.

Current policy means where a pupil lives beyond two miles of their nearest "suitable" school, they are entitled to transport assistance to any suitable school. Special transport needs may arise if a pupil has a level of impaired mobility, which necessitates the use of a wheelchair, or a pupil has a medical condition/severe learning difficulty. The EA determines what special transport arrangements must be made. When pupils have special transport needs, officers of the EA, drawing upon medical and other advice as required, will assess the pupil's transport needs and make appropriate arrangements.

7. IMPLEMENTATION PLANS (IF THE PROPOSAL IS APPROVED)

Note: The timeline should be considered in advance of DP publication, this will impact on when the DP should be published to allow sufficient time from decision to implementation.

7.1 Outline all actions required to deliver the proposal if approved. Does the implementation date reflect this, is it deliverable? If phasing is being proposed explain why it is necessary?

The implementation date of 31 August 2022 has been chosen and ensures appropriate time for implementation following approval, including the actions outlined below. No phasing is being proposed.

If a development proposal is approved, the following steps would be taken.

- CCMS adviser/s would liaise with St Anne's PS and schools where the pupils would transfer to, assisting (when requested) with the pastoral aspect of the move.
- Parents/guardians would have the opportunity to visit alternative schools.
- Meetings with SEN co-ordinators would be organised to facilitate the efficient and effective transfer of SEN pupils.
- Administration of admissions documentation would be organised.
- There would be sufficient time for the school to liaise with the EA regarding the transfer of their assets to other schools and with CCMS regarding secure storage of documents which need to be held.

7.2 Depending on type of proposal, this could include arrangements for pupils transferring to other school(s), maintaining continuity for examination classes, applications for additional accommodation and timeframe for delivery which takes account of time needed to secure all the necessary approvals to allow accommodation to be provided.

Pupils transferring to post-primary will adhere to the same policies and procedures for transferring to a post-primary school, as per current policies and guidelines.

7.3 Details of any arrangements for Shared Education Partnerships and how they would be impacted should be included in this section.

St Anne's PS is linked with Ballyvester PS through a shared education initiative. The proposed closure of St Anne's PS would result in the end of this partnership.

7.4 Will there be composite classes, or will they be removed; will the school operate a double entry?

This proposal means the pupils would have a greater opportunity to attend schools which do not have more than two-year groups in one class.

7.5 How will the School/EA ensure that the education of the children is protected during / after the proposed change?

Measures will be put in place to protect the educational and pastoral needs of the pupils during the transfer to another school. Once the receiving schools know the particular nature of the pupils' needs, they can be proactive and prepare to offer the required support for the pupils.

The staff in the receiving schools would have expertise in catering for pupils with special educational needs and they would ensure that there is no diminution in the level of care currently in place. Personal Education Plans (PEPs) would set out the nature of support pupils require. PEPs will transfer across to the new school with the pupils and would remain in place.

8. RESOURCE IMPLICATIONS

Detail finance/resource implications (both capital and recurrent) of the proposal and approximate costs where available.

8.1 Is the proposal cost effective?

Finance – Budget position, impact on budget, cost of proposal

This proposal is cost effective and will strengthen provision in the area as the other nearby schools would benefit from the additional pupils. If approved, there would be savings made upon closure of St Anne's PS. Savings would accrue from the following main sources: reduction of building maintenance costs; removal of small school support funding; and, removal of principal release funding.

8.2 Staffing – Additional teaching staff required, cost / redeployment, redundancy cost The school's staff cohort is commensurate with the current and anticipated enrolment. Any redeployment/redundancy costs will be in line with current guidelines. It is not possible to predict the number of redundancies or redeployments in advance of a decision regarding the development proposal. Therefore, it is not possible to cost these accurately at this time. In the event of the closure of the school, employment/deployment opportunities for both teaching and non-teaching staff would be sought in alternative schools.

8.3 Transport – Any additional cost

The majority of the pupils attending St Anne's PS live within a 3-mile radius of the school with a small number of pupils living beyond a 5-mile radius. The discontinuance of St Anne's PS would require the provision of home-to-school transport for certain pupils. Any transport arrangement will be in accordance with transport regulations and identified preference school.

8.4 Accommodation – brief description of current accommodation / site, any capital proposals or minor works applications. Immediate day one minimum capital requirements should the DP be approved, site suitability to support changes, estimated cost and timescales for delivery of changes. Note: Approval of a DP does not automatically attract additional funding or accommodation and that these issues will be dealt with separately by the Department.

It is not anticipated there will be any accommodation costs to facilitate the closure of St Anne's PS.

8.5 Other issues requiring resources

N/A

<u>APPENDIX A – Annual Area Profile 2020</u>

Primary School Annual Area Profile 2020

DE Ref No	School Name	Status	Council Area
4033008	St Anne's Primary School,	Catholic	ARDS AND
	Donaghadee	Maintained	NORTH DOWN

	Annual Census	Information	
Year	Total pupils Y1-Y7	IMU	FSME %1
2016/17	41	0	48.8%
2017/18	43	0	46.7%
2018/19	50	0	42.0%
2019/20	49	0	44.9%
Approved Recepti	76		
Approved Reception-Year 7 admissions number			11
Year 1 Pupils 2019/20			7
First Preferences	Applications 2019/20		9

Formal Intervention	
In formal intervention any period 1 April 2019-31 March 2020	

	Budgets					
Year	Available Delegated Resources £	Surplus/Deficit £	Surplus/Deficit			
2016/17	233,496	-7,941	-3.40%			
2017/18	196,539	-11,257	-5.73%			
2018/19	207,439	-51,726	-24.94%			

	KEY TO SYMBOLS & TEXT USED IN DATA ABOVE					
Symbol/Text	Definition					
*	Relates to fewer than 5 cases					
** Includes IMU						
#	Means that a figure greater than or equal to 5 had been treated to prevent disclosure of a small number elsewhere					
	School not open in the relevant academic year					
na	Not applicable					
1	Includes pupils in year 1-year 7 classes only					

APPENDIX B – Schedule of Accommodation

403-3008 (04-0518) - Saint Annes Primary Site, Shandon 9 Millisle Road, Donaghadee, BT21 0HY Size = 0.32(Has)/0.797(Acres) - L.I.A. = 245(M2)

No Name

Size (m2) Description

Saint Annes Primary BLOCK 1

0 Shell 0

1 Corridors 1 Corridor

2 Assembly/Dinning 2 Multi purpose Hall

4 Female Toilet 4 Toilet

5 Office 5 9.46 Office 6 Store 6 Store

7 Male Toilet 7 Toilet
8 Cleaners Store 8 Store
9 Staff Toilet 9 Toilet
10 Corridor 10 Corridor

11 Disabled Toilet 11Toilet12 Cloaks 12Cloaks13 Store 13Store

14 Classroom 14 Staffroom (Was Classroom)

15 Classroom 15Classroom16 Classroom 16Classroom17 Store 17Store18 Boiler House 18Store

19 Roof Space 19

Saint Annes Primary BLOCK 2

20 Lobby 20 Lobby 21 Boys Wc 21 Toilet (B)

22 Girls Wc 22

23 Classroom 23 Classroom/Resource Rm

24 Store 24 Store

Saint Annes Primary BLOCK 3

25 Grounds 25 Grounds

<u>APPENDIX C – Minor Works</u>

Minor Work Details - Standard School Report

Ref No	403-3008		DIOCESE	Down & Connor	Enrolment	50	
School	St Anne's	Primary School	PARISH	Bangor	FORMULA/APPROVE D	<i>76</i>	<i>76</i>
ELB	EA SER		EDUCATION ADVISER				
Principal			TRUSTEE				
Scheme	Year	Description		Status	Budget	Date T	To DE:
08B	13-14	Fencing to Foundation St	tage Play Area	Pending Approval - Appro Principle	eved in £3,300.00	17/	/07/2013
11B	16-17	Upgrade of Lighting in Ma	ain School Building	Tender Approved - Notific	eation £14,765.15	21/	/04/2017
10B	14-15	Double Doors & Associat	ted Works	Tender Approved - Notific	eation £19,887.44		
09B	14-15	Schools Energy Efficienc Replacement	cy Programme - Boiler	Tender Approved - Notific	eation £26,360.74		
07B	13-14	Toilet Refurbishment		Tender Approved - Notific	eation £37,515.00	17/	/07/2013
06B	09-10	Provision of Perimeter Fe	encing	Tender Approved - Notific	eation £13,500.00	14/	/08/2009
05B	01-02 and	Internal Alterations		Completed - Final Account	nts £24,026.00	26	/04/2000

APPENDIX D - Financial Plan 2021-2024

This plan was available from 24 November 2021 and has been included in the document from 19th January 2022 (commencement of 2 month statutory objection stage).³²

	School: St Anne's Primary, Donaghad	ee		Cost Centre:	21101
				boot demare.	
	EA Locality: East		****	lete celle in	
А	Pupils and Teachers		YEAR 1	omplete cells in yellow** YEAR 2	YEAR 3
^	T aprilo arra reactions		(2021-2022)	(2022-2023)	(2023-2024)
		October 2020	October 2021	October 2022	October 2023
1	Full Time Equivalent Enrolment (excluding Spec Unit pupils)	50	50	59	55
2	Planned Teaching Complement (after amendment to Variables as below)	3.20	3.20	3.20	3.40
3	Planned Pupil/Teacher Ratio (September)	15.63	15.63	18.44	16.18
	Changes in Teaching Staff		YEAR 1	Year 2	Year 3
В			Change in Staff	Change in Staff	Change in Staff
4	Increase in Teachers	1			0.20 M3
5	Decrease in Teachers (enter as positive figure)	L			
С	Planned Expenditure		YEAR 1	YEAR 2*	YEAR 3*
	-		(2021-2022)	(2022-2023)	(2023-2024)
	Expenditure Summary Staff Costs		£ %	£ %	£ %
6	- Teaching		205,746 83.7%	206,579 83.7%	206,579 83.59
7	- Non Teaching		25,854 10.5%	26,113 10.6%	26,371 10.7
8	- Other Costs		212 0.1%	214 0.1%	216 0.1
9	Premises, Fixed Plant and Grounds		6,475 2.6%	6.605 2.7%	6,737 27
10	Operating Costs		9,175 3.7%	9,359 3.8%	9,546 3.9
11	Non Capital Purchases		0.0%	0.0%	0.0
12	Capital Expenditure		2,500 1.0%	0.0%	0.0
13	Less Income (enter as negative figure)		-4,051 -	-2,000 -	-2,000
14	Total Planned Expenditure		245,912	246,869	247,449
	Estimated Savings (enter as a negative figure)				
15	Reduction in Teaching Staff (as per Variables)				
16	Please specify				
17	Please specify				
	Estimated Additional Expenditure (enter as a positive figure)				
18	Increase in Teaching Staff (as per Variables)				4,435
19	Please specify				
20	Please specify			Salar Salar	
21	Total Planned Expenditure after Savings and Additional Expe		245,912	246,869	251,884
	* Planning assumptions include Cost of Living Pay Award Estimate at 1% each	ch year and estimated rate o	f inflation for Other Costs as	2% each year	
D	Budget		THE		
22	Common Formula Funding (CFF)		256,606	256,606	280,426
23	Other funding - (Please specify)	- market and the			
24	Other funding - (Please specify)				
25	Other funding - (Please specify)	Particular Property			
	Total Budget	The state of the s	256,606	256,606	280,426
	In Year Movement	Allen Transport	SEASON OF THE REAL PROPERTY.		Band Name
27	In Year Underspend / (Overspend)		10,695	9,737	28,541
	Cumulative Surplus / Deficit	(Constitution)			1
28	Carry-over from previous year		-16,117	-5,422	4,315
29	In Year Underspend / (Overspend) of delegated resources	The state of the s	10,695	9,737	28,541
30	Closing Cumulative Surplus/(Deficit) 31 March		-5,422	4,315	32,856
31	% Carry Over	E CONTRACTOR OF THE PARTY OF TH	-2.3%	1.7%	11.5%

³² Financial Plan (2021-24), signed off by the Education Authority's LMS on 24 November 2021.

APPENDIX E – Financial Plan 2020-23

This plan was available up to 23 November 2021 and was used during the pre-publication consultation (3 June 2021 – 2 July 2021) and 'affected school' stage (8 October – 12 November 2021).

_	2021).						
				_	_		
School: St Anne's Primary, Donaghadee			Cost Centre:			21101	
	EA Office: Dundonald						
	Dunile and Teachers	1		Only con	mplete cells in yellow		-
Α	Pupils and Teachers		YEAR 1 (2020-2021)	,	YEAR 2 (2021-2022)	YEAR 3 (2022-2023	۱,
		October 2019	October 2020	,	October 2021	October 2022	_
1	Full Time Equivalent Enrolment (excluding Spec Unit pupils)	50	51		57	66	
2	Planned Teaching Complement	3.20	3.20		3.20	3.20	
2	(after amendment to Variables as below) Planned Pupil/Teacher Ratio (September)	15.63	15.94		17.81	20.63	
3	Fiantieu Fupii/Teacher Katio (September)	15.05	YEAR 1		Year 2	20.03 Year 3	
В	Changes in Teaching Staff		Change in Staff	f	Change in Staff	Change in Sta	aff
4	Increase in Teachers						
5	Decrease in Teachers (enter as positive figure)	l					
С	Planned Expenditure		YEAR 1		YEAR 2 *	YEAR 3 *	
Ĭ			(2020-2021)		(2021-2022)	(2022-2023	
	Expenditure Summary Staff Costs		£ %		£ %	£ %	%
6	- Teaching		198,443	82.9%	198,443 82.9%	198,443	82.7%
7	- Non Teaching		26,085	10.9%	25,719 10.7%	25,973	10.8%
8	- Other Costs Premises. Fixed Plant and Grounds		217	0.1%	219 0.1%	221	0.1%
9 10	Operating Costs		6,960 7,572	2.9% 3.2%	7,099 3.0% 7,724 3.2%	7,241 7,878	3.0%
11	Non Capital Purchases		300	0.1%	306 0.1%	312	0.1%
12	Capital Expenditure		207	0.1%	0.0%		0.0%
	Less Income (enter as negative figure)		-500 239,284	-	220 500	240,000	
14	Total Planned Expenditure		239,284		239,509	240,069	
15	Estimated Savings (enter as a negative figure) Reduction in Teaching Staff (as per Variables)						
16	Please specify						
17	Please specify						
	Estimated Additional Expenditure (enter as a positive figure)						
18	Increase in Teaching Staff (as per Variables)						
19	Please specify						
20	Please specify						
21	Total Planned Expenditure after Savings and Additional Expendi	ture	239,284		239,509	240,069	
	* Planning assumptions include Cost of Living Pay Award Estimate at 1% each year	ar and estimated rate	of inflation for Other	Costs as	2% each year	·	•
D	Budget						
22	Common Formula Funding (CFF)		239,423		241,892	256,709	
23 24	Other funding - (Please specify) Other funding - (Please specify)						
25	Other funding - (Please specify)						
26	Total Budget		239,423		241,892	256,709	
Е	In Year Movement						
27	In Year Underspend / (Overspend)		139	T	2,383	16,640	I
	Cumulative Surplus / Deficit		0.1.10.1		04.005	00.000	
	Carry-over from previous year		-31,404		-31,265	-28,882	
29	In Year Underspend / (Overspend) of delegated resources		139		2,383	16,640	
30	Closing Cumulative Surplus/(Deficit) 31 March		-31,265		-28,882	-12,241	
31	% Carry Over		-15.0%		-13.7%	-5.4%	
		<u> </u>					
G	CATEGORY		Category 3	3			



St Anne's Primary School, Donaghadee SCHOOL REF: 403-3008

PROPOSAL

The discontinuance of St Anne's Primary School with effect from 31 August 2022 or as soon as possible thereafter.

SUMMARY OF CONSULTATION

Pre-publication consultation commenced with St Anne's PS at meetings with the Board of Governors (BoG), staff and parents/guardians on 27 February 2020. Following the meetings, CCMS agreed to delay the dissemination of this pre-publication booklet to governors, staff and parents/guardians in order to incorporate feedback from the BoG. On 18 March 2020, as a result of the Coronavirus pandemic, the First Minister and Deputy First Minister announced that schools would close to pupils at the end of the school day on 20 March 2020. This resulted in area planning activity being suspended. CCMS communicated to the school that the pre-consultation would resume through the issuing of the booklet with stakeholders (teachers, BoG and parents/guardians) when further clarity was received on the area planning process moving forward. Area planning activity was given permission to resume by the Department of Education on 8 October 2020, as a result, CCMS restarted the pre-publication consultation process. All responses received by CCMS ahead of the stalling of the pre-publication consultation have been carried forward as applicable.

CCMS commenced a written consultation with governors, staff and parents/guardians from 3 June until 2 July 2021.

Consultation meetings held in 2020.

Three consultation meetings were held in 2020 as below.

- The staff consultation on 27 February 2020, 8 staff were in attendance.
- The governors' consultation on 27 February 2020, 8 governors were in attendance.
- The parents'/guardians' consultation on 27 February 2020, 42 parents/guardians were in attendance.

CCMS Advisers delivered the presentations. Before each presentation, the presenters highlighted the SSP requirements and the area planning imperatives.

The key issues from the consultation meeting and the written consultation; who raised the issues; and, how they were addressed are recorded in the tables below. Any issue which required further action is noted.

The following key issues were raised at the consultation meetings and in written responses:

- There were no responses, verbal or written, in favour of the proposal to discontinue St Anne's PS.
- The closure of the school means a journey of approx. 8 miles to the nearest Catholic school.
- Respondents focused on the school being the focal point of the Catholic community and the potential removal of a faith school from the community.
- BoG requested some amendments to documentation before it was given to parents/guardians.
- Staff, parents/guardians and BoG insist the school is being discontinued in the face of the growth of Donaghadee.
- Many responses also noted that while St Anne's PS may be a Catholic school, it is made up of pupils of many different faiths and none.
- Many parents/guardians said their children flourished in a composite class.
- BoG members/parents/guardians quoted from an NI Assembly briefing paper that there are no significant differences in single year group classes as opposed to composite classes.
- Closure of the school will be detrimental to the whole area.
- The closure of the school removes the opportunity of other schools in the area to partake in Shared Education.

Further issues are raised and are noted below.

Issues	Staff	Govs	Parents/ Guardians
Staffing Matters			
School staff had co-operated with the ETI inspection when other schools were not participating due to 'action short of strike' a testament to school staff.	Х		
What would happen to staff if the school closed? Action by CCMS	Х		
CCMS officer talked to teaching and support staff after the briefing re the conditions of employment that apply to them and to address any queries.			
Queried a statement on the presentation that the school closure could provide greater long-term security for staff. Action by CCMS		Х	
It was agreed this statement would be amended for parents/guardians to read "Potentially greater long-term security for staff". It was stated that St Anne's is an excellent school, providing the pupils with an excellent education with excellent staff.			X
Pupil Issues			
Disagreed with quotes from the SSP regarding 'Quality Educational Experience' with particular reference to the challenges of smaller schools with composite classes made up of more than two-year groups. Said that this was not the case in St Anne's PS.	Х		X
Had the effect of moving children out of their school to a school in another area been considered? The policy does not consider the needs of the child.	Х	Х	
Issue of accessibility and the distance the pupils would have to travel to the nearest maintained school.	Х	Х	Х
CCMS were removing Catholic Education provision from Donaghadee.	Х		Х
Generic nature of the presentation did not reflect the extra-curricular provided by St Anne's PS.	Х		
St Anne's had a longstanding shared education partnership with Ballyvester PS.		Х	
Can the school hold 105?			Х
Would an enrolment of 76 help reduce the deficit the school had accrued?			Х
The governors had encouraged everyone to forward responses outlining the mixed religious make-up of the school.			Х
The importance the role the school plays in the community was noted.			Х
Small schools have benefits for the pupils that they would not receive at a bigger school.			Х
Stability is essential for children and the closure of the school would have a detrimental effect on the pupils.			Х
The provision for pupils with special education needs is excellent due to the hard work of the staff.			Х
Consultation Process			
The substantial housing going up in Donaghadee was raised and the nearest Catholic provision was oversubscribed.	Х		X
A query arose as to how many proposals go to EPC and do not go any further.	X		
If the school hit its approved admissions number of 76 would assurances be given by the CCMS that they would be left alone?	X		

Being named on the area plan had a detrimental effect on the numbers of the school and the numbers would be higher if they	Х		
had not been named and a date being given on the plan.			
Staff felt that the presentation was generic in many respects.		X	
Concern was expressed at the last line in 'Option 2' it is challenging to see how sharing could address the long-term sustainability facing St Anne's. Requested this should be amended before hard copy of presentation be given to parents/guardians. Action by CCMS		Х	
CCMS agreed to change the line to 'At this time it is challenging to see how sharing could address the long term sustainability issues facing St Anne's PS'.			
Parents/guardians voiced their unhappiness with the process at start of the meeting.			X
Parents/guardians were unhappy with the proposed date of closure in the presentation.			Х
Queried if the community would be involved in the consultation?			Х
Would the school be under review if the enrolment was 76?			Х
If the school reduced its deficit, is growing and as Donaghadee is the fastest growing town in North Down should the school be given the chance to grow?			Х
Parents/guardians wanted a direct link to CCMS and the principal will act as a conduit. Action by CCMS CCMS agreed the Area Planning Officer would keep in touch with the Principal.			Х

Table of Responses received in 2020

	Parents/Guardians:	Staff:	Governor	Joint BOG Response	Total
'Yes' Responses	0	0	0	0	0
'Yes" Responses – but some concerns	0	0	0	0	0
raised:					
'No' Responses:	6	0	0	0	6
Neither yes/no responses:	0	0	0	0	0
Total number of responses received	6	0	0	0	6

Table of Responses in the written consultation process 3 June – 2 July 2021

	Parents/Guardians:	Staff:	Governor	Joint BOG Response	Total
'Yes' Responses	0	0	0	0	0
'Yes" Responses – but some concerns raised:	0	0	0	0	0
'No' Responses:	25*	6	1	1**	32
Neither yes/no responses:	0	0	0	0	0
Total number of responses received	24	6	1	1	32

^{*} Two responses from the same parent/guardian. One scripted in 2020 (but not received by CCMS at that time) and another in June 2021. Both responses were received during the 2021 consultation process.

^{**}Collective response from the Board of Governors

Key issues raised by written responses and not raised at a meeting. Most written responses re-iterated the key points at the stakeholder consultation meetings.

Issue	Raised by
St Anne's PS has grown over the last five years.	Parents/guardians, Govs
Closing the school is contrary to Rural Schools Act.	Parent/guardian
Transport to another school places additional burden on parents/guardians of children with co-morbidities.	Parent/guardian
It is wrong to close a school based on a document that is eleven years old.	Parents/guardians
No child has ever been disadvantaged by being in a composite class.	Parents/guardians and Govs
ETI report indicates lessons observed were good or very good.	Parents/guardians, Staff
School enjoys strong leadership and management.	Parents/guardians, staff
The school does not accept the assertion in the SSP that small numbers in each year group limits the opportunities for	Govs, staff
working with peers.	
The welcoming Catholic ethos of the school shows Pastoral Care is at the centre of the school's provision.	Parents/guardians
Decision to close the school overly relies on quantitative data which is not balanced by qualitative data.	Parents/guardians
SSP states that 'Local circumstances' need to be considered in determining appropriate action.	Parent/guardians
CCMS presentation seems to include or omit reception pupils to suit their argument.	Staff
Consultation process has had a detrimental effect on the school's enrolment.	Govs, staff
The closure of St Anne's PS may also affect the intake of St Columbanus College, Bangor.	Gov
Will arrange a delegation of parents/guardians, councillors and MPS to meet CCMS.	Parent/guardians

The analysis of the written submissions from stakeholders is below. This includes submission received in 2020.

Stakeholder Comments	Parents/ Guardians	Joint Gov (10)	Gov (1)	Staff	Pupils
St Anne's has shown growth over the last five years. Projected to exceed its quota of 75 pupils, the	6	Gov (10)			
maximum physical capacity of the school.	0	10			
Donaghadee is an expanding area. An estimated 400 new homes to be built. Further building	19	10		2	
developments are planned.					
Population of Donaghadee has grown by 1000 in the last decade.	1	10			
Closing the school forces a journey of approx. 8 miles. This adds transport costs. In addition, there	20	10	1		
are issues with the rush hour traffic in the morning.					
Closing the school is contrary to the Rural Needs Act.	2	10			
Transport to another school places additional burdens on children with co-morbidities.	5				
It is a small school with an excellent reputation.	11	10			
This will mean the removal of parental choice for a faith school in the area.	20				
It is a school that welcomes all faiths and none and all nationalities.	14			3	
Wrong to base closing of school on document published 11 years ago (DE SSP).	2				
School provides a quality educational experience with a wide range of extra-curricular activities with	9	10		1	
opportunities for 1:1 learning.					
Effective management of composite classes leads to an inclusive ethos. Evidence that composite	16	10		2	
classes do not negatively impact learning and teaching.					
No child has ever been disadvantaged by being in a composite class. The ETI report evidenced this.	2	10			
A decision to close would have a devastating impact on every young child, family and staff member.	2	10			
ETI Inspection report indicates lessons observed ranged from good to very good.	2				
There is sound financial planning. The school is living within its budget.	7	10		1	
School enjoys strong leadership and management as evidenced by ETI Report.	8	10		1	
The school is closely connected to its Catholic community.	11	10		3	
The school does not accept the assertion of the SSP that the small numbers in each year group limit		10			
opportunities for working beside peers.					
The school is very accessible. Most children walk or cycle to school.	5	10		1	
Respondents report that ETI say that St Anne's PS provides a broad and balanced curriculum	9	10		2	
enriched with a wide range of additional opportunities experienced through the 'Shared Education					
Partnership'.					
The welcoming Catholic ethos of the school shows that Pastoral Care is at the centre of the school's	19			4	
provision.					
The school shows great care and inclusiveness for pupils with SEN.	5	10	- 	1	

A decision to close the school under the SSP quantitative criteria and not balanced by qualitative	1	10			
criteria is wrong.					
SSP document states that 'Local circumstances need to be considered in determining appropriate		10			
action'.					
BoG disagree with inclusion of St Anne's PS 'Annual Profile' in pre-consultation booklet since it		10			
includes financial information that is two years out of date.					
The school helps its community with the Breakfast Club and Wrap Around Care.	2	10		2	
St Anne's PS collaborates with the Bangor Parish family of schools at all levels.	1	10			
St Anne's PS collaborates across the wider community of schools.	3	10		1	
CCMS Presentation seemed to include or exclude Reception pupils in their argument to suit their				1	
argument.					
Closing St Anne's PS removes the only Catholic presence in the town.	15			2	
Small schools allow teachers and support staff to get to know their pupils both academically and	2			1	
emotionally more easily.					
Smaller class sizes do mean more 1:1 attention to all pupils especially pupils with SEN. It enables				2	
early intervention.					
ETI reported that the shared education presented is at its best.	2			1	
St Anne's PS meets all the criteria laid out in DE SSP.				1	
Closure of the school removes the opportunity of the other schools in the area to partake in Shared	1		1		
Education.					
The Catholic ethos embraced by St Anne's PS promotes a Christian lifestyle.	9		1		
As a newcomer the Catholic ethos most resembles the ethos of my home.	1				
Travelling to school some distance away will necessitate journeys by car at least three times a day to	1				
pick up children as they finish at different times.					
There will be no financial saving in closing the school.	2				
Recent intake to the school was reduced to two in no small measure due to this damaging process of			1		
closure consultation.					
Closure of St Anne's PS may affect intake of St Columbanus College Bangor.			1		
Will arrange a delegation of parents/guardians, councillors and MPS to meet CCMS.	1				

a) FINANCE DIRECTORATE

403-3008 St Anne's Primary, Donaghadee

The school's **Provisional** Surplus position as at 31 March 2022 is £12,523.

The school's Deficit in the previous year, up to 31 March 2021 was (£16,117).

The school received a total delegated budget of £263,108 in the 2022-23 financial year for **50**¹ FTE pupils, which generates a per capita of £5,262.

The average for all primary schools is £3,404.

The total Free School Meals Entitlement for the school is **29**³³ pupils, which represents 58.00% of the total FTE, which places the school in Band 3 for funding purposes.

The school received £51,863 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.

All schools receive a delegated budget for the financial year on the basis of verified enrolments as at the October Census prior to the financial year. The figures below represent those figures estimated for the 2022-23 financial year.

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

³³ The school's funding allocation is based on the previous year's census data (e.g. the October 2021 census data was used to determine the 2022-23 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).

Factor	2022-23 £	2021-22 £	2020-21 £
Pupil AWPU	127,269	128,079	119,249
TSN – Social Deprivation	23,756	20,374	15,519
TSN – Additional Social Deprivation	4,284	3,844	2,798
Premises Area	3,159	3,159	3,159
Premises FTE	4,271	4,250	4,224
Small Schools Support	51,863	49,807	47,726
Primary Principals Release Time	16,420	16,420	16,420
Foundation Stage	14,103	14,804	14,453
Teachers Salary Protection	13,270	11,127	11,459
Children Looked After	1,178	2,372	1,104
Newcomer Children	3,535	2,372	3,312

Total School Funding	263,108	256,606	239,423
Pupil FTE (no.)	50.00	50.00	50.00
Per Capita	£5,262	£5,132	£4,788

b) TRANSPORT AND FOOD IN SCHOOLS DIRECTORATE

Given the numbers involved it would be anticipated the financial implications for the Transport budget would be offset by the savings made in closing St Anne's Primary School, Donaghadee.

c) SCHOOL ADMISSIONS TEAM

St Anne's Primary School is a Roman Catholic Maintained PS, located in Donaghadee. The school's approved admissions and enrolment numbers are set at **11-13** in admissions and **76** enrolment.

DP 673 proposes St Anne's Primary School, Donaghadee will discontinue with effect from 31 August 2022, or as soon as possible thereafter.

Applications:

Over the past four years the school has received the following applications for admission to Year 1:

Year	Approved Admissions	First preference applications	Total Applications (all preferences)	Total Admissions*
2018/19	11-13	*	6	6
2019/20	11-13	*	*	*
2020/21	11-13	9	9	9
2021/22	11-13	*	*	*

^{*}Excludes pupils with a statement of special educational needs

Temporary Variation (TVs)

If a school receives more applications than it has places available it can request a TV to its admissions and/or enrolment number from the Department

St Anne's PS has not applied for any TVs over the last 4 years.

d) INCLUSION AND WELLBEING DIRECTORATE

Special Education Needs (SET) Input

It is noted in the Case for Change that St Anne's Primary School (PS) is not considered a sustainable school. Attendance at a sustainable school underpins the fundamental principles of the special educational needs (SEN) Code of Practice³⁴, which focuses on a continuum of need 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.

The Case for Change provides details of how the specific requirements of pupils with SEN will be catered for under the proposed new arrangements. It states that, if this proposal is approved, the Catholic Council for Maintained School (CCMS), in liaison with the Education Authority (EA) and the schools involved, would ensure the following steps are taken:

- Assistance for pupils, as required, in managing the transition to a new setting.
- Continued appropriate placement for pupils with a statement of special educational needs, and assistance for these pupils in managing the transition to a new setting.
- Early and confidential transfer of statements and Personal Education Plans (PEP) to the new school.
- Consideration, as necessary, of the facilities and equipment required to support pupils with SEN.
- Consideration, as necessary, of Learning Support Centre provision where appropriate.
- Consideration, as necessary, of transport arrangements.

The Case for Changes states that if the development proposal is approved, that various steps would be taken including:

- Meetings with SEN co-ordinators would be organised to facilitate the efficient and effective transfer of SEN pupils.
- Administration of admissions documentation would be organised.

The Case for Change also states that the staff in the receiving schools would have expertise in catering for pupils with special educational needs and they would ensure that there is no diminution in the level of care currently in place.

SET would not oppose this individual DP, subject to any impact on pupils with SEN being considered and managed effectively.

³⁴ https://www.education-ni.gov.uk/articles/special-educational-needs-code-practice

Pupil Support Team (PST) Input

We note that there are XX children looked after attending the school and would have concerns about a school move for them. Whilst we don't know the specifics of how they entered the care system, children looked after 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 child looked after has and key to this are the relationships formed both with their peers and members of staff – for St Anne's PS to close and these children to be sent to another school this could be interpreted by them as a further rejection in a life which has been filled with rejection, something which may be very difficult for them to overcome. The DE/DoH draft Looked After Children's Strategy has a central tenet of ensuring stability is prioritised for children looked after, both in terms of their home and school placements. It would be important that appropriate support is provided to these children to help with the transition to another school.

e) SHARED EDUCATION AND COMMUNITY RELATIONS TEAM

Current Position

St Anne's Primary School is currently involved in a funded SESP Transition Phase partnership with Ballyvester Primary School (401-1265)

List of neighbouring <phase> schools provided by Area Planning

	School	Programme	Membership
Ref No	Name		
	St Anne's Primary	SESP TP	Ballyvester PS
4033008	School		
	Carrowdore Primary	-	-
4016020	School		
	Donaghadee Primary	CASE	Killard House
4011654	School		
4011681	Millisle Primary School	-	-
	Ballyvester Primary	SESP TP	St Annes PS
4011265	School		
	Ballymagee Primary	-	-
4016430	School		
	Kilmaine Primary	-	-
4016192	School		
	Towerview Primary	-	-
4016111	School		
	Bloomfield Primary	CASE	St Malachy's PS
4013023	School		
	Ballyholme Primary	-	-
4011650	School		

	St Comgall's PS,	CASE	Grange Park PS
4036146	Bangor		
	St Malachy's PS,	CASE	Bloomfield PS
4036148	Bangor		
		CASE	Londonderry PS &
	St Finian's PS,		Newtownnards
4033017	Newtownards		Model PS

2 of these schools are engaged in SESP transition phase funded shared education partnerships and 5 in CASE.

SECRT CONSIDERATION

The Case for Change

The proposer, CCMS, has acknowledged the longstanding Shared Education partnership of St Anne's with its neighbouring controlled school, Ballyvester PS. They commented that pupils engage in shared curricular/extra-curricular activities, however, these activities do not provide the basis for sustainable provision across the two schools. They have stated that the proposed closure of St Anne's PS would result in the end of this partnership, and removes the opportunity of other schools in the area to partake in Shared Education.

Shared Education was referenced in the pre-publication comments, it was commented that that the closure of the school would leave an enormous gap in Shared Education opportunities for both staff and pupils.

Ballyvester PS commented that their partnership with St Anne's has a very positive effect on the relationships within the school and wider community, and should the Development proposal proceed they would lose their cross community link as their Shared Education work will cease

EA are supportive of the Development Proposal but have not made any comments in relation to Shared Education.

CCMS has complied with its duty to consider shared Education under Article 6 of the Shared Education Act (Northern Ireland) 2016.

SECRT ASSESSMENT

The comments in the Development Proposal suggest a negative impact on Shared Education partnerships, the closure of the school removes the opportunity of other schools in the area to partake in Shared Education.

f) EDUCATION WORKFORCE DIRECTORATE

No issues or concerns have been identified, from a policy perspective, in respect of this development proposal for teaching and non-teaching staff.

Should the case be approved and subsequent staffing issues are identified, 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 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.
- TNC 2013/2 School Reorganisation Agreement and DE Circular 2013/7 –
 School Reorganisation Allowances: a teacher who suffers a reduction in pay
 as a result of staff reorganisation or redeployment may be eligible to apply for
 a school reorganisation allowance;
- **TNC 2010/1** Procedure for Handling Teacher Redundancy: will apply where a teacher is considered, or wishes to be considered for redundancy;
- 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.

Date of last ETI report: September 2018: St Anne's Primary School, Donaghadee 403-3008

Web link: Primary Inspection - St Anne's Primary School, Donaghadee, County Down 403-3008 (etini.gov.uk)

Date³⁵: 9 February 2022

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

No further detail.

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

According to the published papers in relation to the development proposal, there is available education at local primary schools; Millisle Primary School has 45 places and St Malachy's Primary School, Bangor, has 80 places.

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

In 2020/21, the key stage 2 composite class spanned more than two year-groups with only one pupil in year 7. This is a challenge for the teacher to ensure adequate progression in learning and planning to meet individual needs across a wider range of abilities and stages of development. It also limits opportunities for the children to develop socially and emotionally with those of a similar age and stage of development.

The potential closure of the school reduces the opportunities for shared education across schools and associated communities in the locality.

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

If the development proposal is agreed, the educational authorities need to facilitate parental choice regarding the transfer of the children to alternative schools in the area and provide appropriate transport to such schools.

³⁵ This commentary paper is based on the information and evidence available to ETI on this date. Please check the ETI website <u>www.etini.gov.uk</u> for any new inspection reports that may have published after this date.

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

Sustainable		Meets criterion			
Schools Criterion	Indicator	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 - No additional information from 2018	
	1.2 In primary, a single classroom contains no more than two year-groups in a composite class; for example, years 1 and 2.		No - key stage 2 spans three year-groups.		
1.3 A minimum of fou school. This recognis pupils and the deman 1.4 The ability of the schildren with Special 1.5 The ability at post able to provide suitable entitlement framework appropriate, linkages	1.3 A minimum of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers.			N/A	
	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.			N/A	
	1.6 The standards and the quality of learning and teaching at the school.			N/A	
1.7 The range of cur extra-curricular activichildren including ca education, music, art 1.8 The quality of the for learning and teac	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, energy and water efficiency and suitability of the buildings.			N/A	
	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	4.1 Governors' views on the school based on		N/A
Leadership	quantitative and qualitative evidence.		
and	4.8 There is a school development plan in		
Management	place and progress is being made to achieve		
by Boards of	the plan's aims and objectives.		
Governors and	, , , , , , , , , , , , , , , , , , ,		N/A
Principals	and non-attendance as well as positive		
	behaviours such as involvement in school		
	management (e.g. buddying and mentoring		
	schemes).		
Strong links	6.1 Degree and quality of parental		N/A
with the	involvement (schools will be asked to provide		
Community	evidence on this).		
	6.3 Contribution of the school to the		N/A
	community (schools will be asked to provide		
	evidence on this).		
	6.4 Presence of other features of provision,		N/A
	e.g. nursery or specialist unit.		

6. Summary of impact of the proposal

The development proposal 673 aligns with the Sustainable Schools Policy.

Appendix M

Representation received during the two month statutory objection period

Responses **Not** in Support of DP 673 – Emerging themes

Removal of parental choice/Distance of alternative provision

- The removal of the option for Catholic education in Donaghadee will (through practical and geographic reasons) remove the option of Catholic education for many families for whom faith-based education is a priority;
- There will be no choice of a faith school within a six-mile radius of Donaghadee;
- The idea of closing the school, have them travel to another faith school far outside the local community and away from friends at such a young age will have an immense detrimental impact on their learning journey;
- Of the three closest catholic schools outlined in your presentation and offered as "alternative provision" only one of these schools have unfilled spaces, therefore as a parent I do not feel that there is a sufficient choice of alternative provision for my children;
- Parents are the first educators of their children and have the right to choose faith based education for their children if they so decide;
- What is the alternative? Putting young children on a bus to travel miles in all weather, to find a Catholic school because Parents believe and uphold the values taught, caught and enshrined in Catholic Education;

Impact on Children/Community

- A decision to close would have a devastating impact on every young child, family and staff
 of St Anne's Primary School as well as the community in which the school plays a vital part;
- You do also have an obligation to protect the mental health of both the children and staff
 and consider the serious trauma the closure of the school will cause. Surely they have
 endured enough over the last two years. Requiring young children to make even more
 adjustments to their school routine will undoubtedly cause mental health issues;
- There is no other faith school in the surrounding area, and the closest catholic primary school is 7 miles away. My children moving to a new school in an unfamiliar area would be detrimental to their wellbeing who would be torn from their friends and community to attend a school in a town they have no association with. I do not feel that a 15 mile return journey is suitable for children of such a young age;
- St. Anne's Primary School has very strong links to the community. It is a catholic school in a predominately protestant area, and is an integral part of the community. It also has a shared education programme with another local school;
- A round trip, daily, of 12- 16 miles. This is not doable for children from 4 years old. It has
 negative economic implications also for many parents in terms of travel and time costs;
- St. Anne's for many years was Staffed by my own Congregation of The Sisters of Mercy who worked tirelessly despite all the odds of sectarianism, bombing of the school and the

- endless efforts at Fundraising to maintain both a Catholic School and Church for the Catholic population. What a shame to see that at the stroke of a pen all this hard work and labour wiped out.
- Established by the Mercy Sisters, St Anne's has been serving the communities of Donaghadee/Millisle/Groomsport for 90 years;
- Saint Anne's Primary School has been, and still very much is, such a dynamic educational and child-centred community;
- Children will be separated from friends and teachers if they are redistributed to other schools;

Quality of Education/Staff

- We respect and admire the excellent work of the school, as referenced in their most recent ETI Inspection Report;
- St. Anne's offers an extensive range of excellent education to my children. They enjoy a
 wide range of indoor and outdoor activities. They also enjoy varied extra-curricular
 activities:
- In its most recent ETI inspection report (2018) of St Anne's Primary School, Donaghadee it concluded that for all the criteria the school was classed as either "very good" or "good" across its quality of education provision;
- The 2018 ETI report evidences strong leadership and management;
- As a parent I have a clear direction on the educational direction that St. Anne's is providing for my children;
- Teachers and pupils are also active in the wider Bangor Parish Family of Schools and run shared learning and church gatherings for pupils;
- It should also be noted the exceptional support that all teachers provided to pupils and their families throughout the pandemic;
- My children avail of the wrap around care available such as breakfast club and after schools club as well as Lookout After Schools club, all of which are imperative to me as I work full time;
- Saint Anne's Primary School gave me the educational platform to succeed and instilled a strong desire to learn, to progress and to do better all the time. Much of the success I have achieved can be attributed to the exceptional guidance and teaching I received at St Anne's, at such an influential and formative time in my life;
- St Annes has 'all inclusive' school plays where every single child gets either a speaking or singing part; this would not be the case in a larger school and as such does wonders for the children's confidence at a young age at being able to speak out in front of an audience, a quality which will increase their self-esteem and stay with them for life;

Shared Education

- St Anne's PS has been a beacon for Shared Education through longstanding partnership with Ballyvester PS;
- Do not deny your people of their right to choose a faith based shared education in their hometown;
- The school achieved the Gold Standard of shared education

Access to St Columbanus' College

St Anne's PS is a feeder school to St Columbanus' College. Any removal of St Anne's PS
may impact the possibility of future enrolment to St Columbanus' College for faith-based
education for the children of Donaghadee for whom this is a priority, given that they are no
longer attending faith-based schools - a key Admissions Criteria for the College.

Benefits of Small Class size

- There is one to one time which I feel is imperative for my children as my daughter is more inclined to spend time on her numeracy work, but requires gentle coaxing on her literacy;
- Her teacher is keen to ensure that she keeps up with other pupils in her class by building on her reading skills and has successfully achieved this through recognising this early on. It is my opinion that this would not have been picked up as quickly in a larger classroom environment of 30 plus children;
- I am a past pupil of this school attending when numbers were comparable to the present situation and I benefitted greatly from the small class sizes and the individual attention this enabled teachers to give to each pupil. I had a broad, balanced and wide curriculum and all my talents were carefully nurtured;
- The school had a glowing ETI report in 2018 which states (Para 6.2) All of the lessons were good or better; with two thirds being very good. Key features of this practice include: the very effective classroom management of differentiated learning within composite classes;

CCMS process

- Affording only a two-hour parent consultation pre Covid in February 2020 during the Prepublication Consultation;
- Stakeholders' objections were collated by CCMS and formed only a bullet point summary at the end of the 'Case for Change' with no consideration to the valid points;
- CCMS' member dismissed the key point of 400 new houses being built in Donaghadee as the demographics in the area showed limited growth yet Donaghadee is the fastest growing town in Northern Ireland verified by various newspaper articles;
- Their EPC zoom meeting which decided the fate of St. Anne's, the Proposer and Seconder were both from Dungannon and would not know the school community, history nor the ramifications closure would have;

 Refusing to have any consultation and would only reply to e-mails in a generic format regarding their procedure with no specific answers to my relevant enquiries

Growth of Donaghadee

- The demographics stated in the presentation predicts that the population of 4 to 11 year old children will decrease in Ards and North Down area. However, Donaghadee is continuing to grow in size, especially with the announcement of over 400 new houses being built and this building has already commenced;
- The Catholic population of Donaghadee and surrounding areas in increasing and it is imperative that parents are afforded equal opportunities by being able to choose a Faith based education for their children;
- When one considers that Donaghadee is a thriving and burgeoning town with a number of new housing developments appearing in the last number of years there is a very strong argument to suggest that the impressive increase in enrolment over the last ten years could be replicated over the next ten years;
- The statement in the CCMS presentation "there is no evidence, based on past enrolments, or future predicted enrollments, to suggest St Annes can meet the requirements for the Sustained Schools Policy of 105 pupils" is completely erroneous! Enrolment is up 72 percent in 10 years
- Even if only half of the new homes produced an average family of say two children and St Anne's enrolled 10 percent of them, then St Anne's would receive an extra 40 pupils which would put it beyond the current capacity of 76 and well on the way to the SSP magical target of 105 and that is just from one new housing development alone, not to mention the other developments at Hadlow and Montgomery Meadows, and also the influx from 'normal' enrolment routes:

Other

- Outcome 12 of the Programme for Government recommends that "we give our children and young people the best start in life" with one of the indicators identified to determine progress on meeting this outcome being the "percentage of schools found to be good or better". St. Anne's Primary School, as recognised by DE, clearly provides a quality of education that not only meet this level but exceeds it. Again, it remains difficult to understand how a decision to close the school has been made;
- The EAs interpretation of enrolment numbers at St. Anne's had remained similar over recent years and is either stagnant or in decline is not true;
- Enrolment has steadily increased over the past 10 years;
- The foundation of moral and spiritual values, carefully structured in Catholic teaching programmes, may become patchy and at the worst inconsistent;
- The school is exceptionally welcoming of all faiths in our local community and this is the type of educational experience I want for my children;

- St Anne's Primary School should be commended as they have reduced a potential £20,000 in-year over-spend in 2019/20 to just £6,000 as at 12th November 2019;
- With St. Anne's continuing to increase their enrolment figures, the present deficit will quickly decrease:
- As a parent, I feel that the recommendation to close St Anne's, is based on outdated policy, ill-informed financial information, speculative enrolment trends and "bottom line" statistics rather than the holistic approach of what a modern day education for our children should be in the 21st century. The type of education that is currently being successfully delivered to a very high standard at St Anne's Primary School, Donaghadee as confirmed by the Department for Educations own Education & Training Inspectorate;
- Pupil numbers have steadily increased from 29 in 2011 to 59 in September 2022;
- In this day and age there is such little exposure to any form of religion on a daily basis for children and the impact of having a catholic education has a profound and lasting effect on individuals;
- The Catholic population of this area are, in my opinion, being discriminated against. The
 argument about small numbers does not make this acceptable as there are MANY
 Integrated schools which have as small, or smaller enrolment than St. Anne's yet they are
 not being threatened with closure;
- I would also draw attention to the fact that at the time of writing the majority of the pupils enrolled at Saint Anne's come from a non-Catholic background. This is a powerful testament to how a school can be integrated in its relationships and yet at the same time be Catholic in its ethos;
- It provides a unique environment whereby the school has a high percentage of non-Catholics who receive the benefit of a Catholic education and so have a knowledge and understanding of the Catholic denomination from first-hand experience which cannot be received from either an integrated education or an education in a state school;
- Any proposal to make the school integrated does not allow for any faith education, not to mention Catholicism. How else would our children be able 'live out' their Catholic faith? The daily prayer, practice, church calendar, sacraments and things such as the 'sacred space' and prayer areas would be abolished and assigned to the history books. This can not be allowed to happen. Catholic schools by their very nature are accepting of all faiths not just Catholicism and teach true diversity, inclusion and acceptance of all children as one Faith Family;
- St Anne's is successful at providing excellent education for children of all faiths, so I understand how a move to integration appears logical. However, it actually limits choice;
- I have it on good authority that St Anne's school is owned entirely by the Parish and if it
 were to close, CCMS are duty bound to pay back to the Education Authority whatever has
 been spent on the school over the years in existence, therefore it would make no financial
 sense whatever to proceed on that basis;
- Uncertainty about the school's future cannot but have a detrimental effect;
- Children walk to St Anne's PS, in a time of an environmental crisis, making children have to travel 12 miles twice a day will increase pollution.

Controlled Schools Support Council



Controlled Schools' Support Council

2nd floor, Main Building
Stranmillis University College
Belfast, BT9 5DY
T: 028 9531 3030
E info@csscni.org.uk

26 September 2022

Dear Sir/Madam

Re: Development proposal 683 St Anne's Primary School

The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. CSSC supports controlled schools, which are open to all faiths and none, in providing high quality education for children and young people to enable them to learn, develop and grow together, within the ethos of non-denominational Christian values and principles.

The diversity of the controlled sector is evident in the age range of pupils it serves, 3 to 19, as well as in the types and locations of the schools which it represents. CSSC celebrates the inclusion of Nursery, Primary, Special and Post-Primary schools within its wide-reaching community, which welcomes all young people, whoever they are and from wherever they come. The controlled sector is the largest education sector in Northern Ireland accounting for 49% of all schools and catering for over 147,000 pupils.

CSSC notes the request of the Board of Governors of St. Anne's Primary School to publish a development proposal for the school to transform to controlled integrated status, with effect from 1 September 2023, or as soon as possible thereafter. CSSC welcomes the opportunity to respond and has consulted with controlled schools in the area.

CSSC works with the Education Authority and other sectoral bodies in seeking to support controlled integrated schools and will support sustainable schools seeking to transform to controlled integrated status within the context of area planning and the overall sustainability of the school estate, taking account of local demographics and community support.

CSSC acknowledges the inclusive ethos of St Anne's Primary School, Donaghadee, which along with local controlled schools, welcomes children of all faiths and none, and acknowledges the positive relationships and collaboration amongst the schools in the locality. CSSC also recognises the aspiration of St Anne's Primary School to become a controlled integrated school and the work undertaken to this effect, as articulated in the case for change.

Controlled Schools' Support Council <u>www.csscni.org.uk</u> Registered with The Charity Commission for Northern Ireland NIC107873 The case for change states that transforming to Integrated status will meet demand for Integrated Education in Donaghadee and the surrounding areas and as a result the school's enrolment will grow. Currently, there are two other integrated schools in the surrounding area. Neither school is oversubscribed. Primary 1 admissions numbers for September 2022 illustrates that Bangor Central Integrated Primary School had 28 available places in Primary 1 and Loughries Integrated Primary School had six available places in Primary 1. Historic enrolment statistics for Bangor Central Integrated Primary School demonstrate a decline from 614 pupils in 2017/18 to 534 pupils in 2021/22. Enrolment statistics for Loughries Integrated Primary School demonstrate an increase from 74 pupils in 2017/18 to 92 pupils in 2021/22. Whilst Loughries Integrated Primary School does not yet meet the Sustainable Schools' Policy minimum threshold enrolment number of pupils, CSSC recognises the growth and development that Loughries Integrated Primary School has worked hard to achieve. CSSC is concerned that parental demand for integrated provision in this area is not sufficient to support three viable and sustainable integrated schools.

The Department of Education's Guidance on Transformation states that, "...an essential consideration for the Department is that the new integrated school will be viable and sustainable for the long term. CSSC is aware of Development Proposal 673, published on 20 January 2022, to discontinue St Anne's Primary School, with effect from 31 August 2022, or as soon as possible thereafter. Ministerial priorities required managing authorities and sectoral body representatives to scope and bring forward proposals to address the issue of primary pupils being taught in composite classes of more than two year groups. St Anne's Primary School currently operates a composite class of three year groups at Key Stage 2. CSSC notes that after careful consideration of evidence, the Council for Catholic Maintained Schools' Education Provision Committee determined that due to the unsustainability of St Anne's Primary School the proposal to discontinue was appropriate. CSSC also notes that following pre-publication consultation and careful consideration of evidence, the Education Authority's Strategic Planning and Policy Committee supported the Council for Catholic Maintained Schools in taking forward DP 673 to discontinue St Anne's Primary School. In bringing forward Development Proposal 683 to transform St Anne's Primary School to controlled integrated status, the Education Authority at pre-publication consultation stage confirmed that they were unable to support the proposal due to the current enrolment of 50 pupils falling considerably below the Sustainable Schools' Policy threshold. The Education Authority also cited the places available at alternative integrated primary schools within a reasonable travelling distance of Donaghadee and the potential for an additional controlled integrated primary school to adversely impact established controlled and integrated provision.

The case for change claims that the school will, "meet all of the sustainable schools' criteria within the next five to seven years". The case for change reports the enrolment numbers for each year group over the last 10 years. Over the last four years the enrolment number has been stable at 49 or 50 pupils. To achieve the threshold of 140 pupils for sustainable

https://www.educationni.gov.uk/sites/default/files/publications/education/Integration%20Works%20-%20Transforming%20your%20School%20December%202017.pdf



Controlled Schools' Support Council 2nd floor, Main Building **Stranmillis University College** Belfast, BT9 5DY T: 028 9531 3030

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schools within this time frame, St Anne's Primary School will need to enrol an additional 13-18 pupils each year over the next five to seven years. Taking account of the live birth figures by academic year for Carrowdore, Donaghadee, Loughries and Warren Wards since 2015, CSSC considers this aspiration to be unrealistic.

CSSC, after consultation with local controlled schools, is unable to support this proposal, which has the potential to have a detrimental impact on the wider network of schools in the area and in particular the sustainability of controlled schools. CSSC is unconvinced by the need for the establishment of a third integrated primary school in this area where places continue to be available in the other two integrated schools. CSSC is concerned at the historic and current nature of enrolments at St Anne's Primary School, which is significantly below the Sustainable Schools' Policy threshold, and necessitate children being taught in a composite class of three-year groups at Key Stage 2.

Yours faithfully

Chief Executive

Mark Baker

Appendix N

Note of Meeting between Andrew Muir MLA the then Minister, Michelle McIlveen MLA, and school delegation to discuss the future of the school.



	☐ PRE-	BRIEF	X MEETING
DATE AND TIME OF MEETING:		Tuesday 1 March from 9.15 - 10.00am	
TITLE/ORGANISATION: [Include INV number were possible and ensure title on re-brief an meeting notes are the same]		ST ANNE'S PRIMARY SCHOOL – DONAGHADEE INV-0056-2022	
VENUE:	□ РВ	Rathgael	X OTHER: St Anne's Primary School, Donaghadee
Chair ofAndrewCouncille	XXXX XXXX	XX	
X Minister OFFICIALS:	X SpAd: XXXXXXX (Sustain	X Minister PS nable Schools Pol	Minister APS licy and Planning Directorate)
OTHERS: [include PDF copies of any			

presentations delivered]		
deliveredj		

KEY POINTS DISCUSSED:

- The enrolment breakdown (25%C/25%P/50%O) has been very mixed and balanced over the school's 90 years;
- St. Anne's PS has a 35-year history of Shared Education and Transformation is the next logical step;
- St Anne's successful collaboration with other local schools in the area, providing shared staff training and joint pupil experiences;
- The cross-community links provided by the school, including Summer and Halloween fairs, Linking Generations, joint carol services, etc.
- The demand for Integrated education in the area;
- How parents and pupils have remained at the school, with some pupils transferring
 in;
- How the integrated education route is important from primary through to postprimary;
- The growth of Donaghadee. Whilst the Ards and North Down Local Government
 District shows a decline in 0-15 year olds, the Donaghadee South ward (where St
 Anne's is situated) actually shows an increase in 0-15 year olds; and
- How Donaghadee has seen a lot more families moving in and high levels of "family"-sized housing in construction. No longer seen as a "retirement town".

ISSUES AGREED:

No applicable

ACTION POINTS / OFFICIAL RESPONSIBLE:

No action points arising

Completed Equality Screening Paper

Equality and Human Rights Screening

PART 1 - POLICY INFORMATION

1.1. Policy Title - Development Proposal to close St Anne's Primary School on 31 August 2022 or as soon as possible thereafter.

The proposal complies with the following policies and guidance:

- Area Planning Guidance for Primary and Post-primary Schools (2016). 'Schools for the Future: A Policy for Sustainable Schools' (Sustainable Schools Policy (SSP)) 2009;
- Every School a Good School (ESAGS) (2009)'.
- 'Providing Pathways' 2017-20 Strategic Area Plan for School Provision 2017-20:
- The United Nations Convention on the Rights of the Child (UNCRC) (1990);
- Section 75 of the Northern Ireland Act (1998); and
- Rural Needs Act (2016).

1.2. Description of policy or decision

Aim: To consider the closure of St Anne's Primary School, with effect from August 31 2022 or as soon as possible thereafter, in light of the above policies and guidance, in particular, in line with the terms of reference for Area Planning, 'Schools for the Future: A Policy for Sustainable Schools' and 'Every School a Good School'.

Outcome: To ensure:

- every learner fulfils his or her full potential at each stage of development;
- efficient and effective provision of education;
- improved educational outcomes for pupils;
- provision of a broad and balanced curriculum:
- a network of sustainable schools within reasonable travelling distances;
- an enhanced quality of provision and the raising of standards; and
- a reduction in duplication of provision.

The proposed discontinuance of St Anne's PS, Donaghadee, contributes to this strategy. One impact of this proposal is to advance the aspirations, aims and objectives of the SSP, "It is important that children in rural communities have access to a quality education in cost effective provision" (p27).

1.3. Who are the main stakeholders impacted? (Internal and external as well as actual and potential)

In relation to the school, the main stakeholders are as follows:

Down and Connor Diocese,

- · Staff, Board of Governors, pupils together with their parents;
- nearby schools Trustees, staff, Board of Governors, pupils and future pupils together with their parents;
- CCMS;
- · Education Authority; and
- Department of Education.

1.4. Is the policy likely to impact people living in rural areas?

Yes	x
No	

If yes, please complete the rural sections of the template

- 1.5. Other policies or decisions with a bearing on this policy or decision?
 - Review of SEN and Inclusion (2012).
 - EA Transport Policy.
 - · Terms and Conditions of Employment (Staff).

PART 2 - EVIDENCE AND MITIGATION

- 2.1. What information did you use to inform this screening? E.g. census data, Equality Impact Assessments (EQIAs), consultation reports, service level data?
 - Census Data
 - ETI Reports
 - Consultation with school and stakeholders
 - · Consultation with local primary schools
 - · Information relating to Section 75 from Department of Education

2.2. Quantitative Data

What is the profile of the people that are impacted by this policy or decision? Please provide a statistic breakdown of the people impacted by this policy or decision. Note, if the policy or decision impacts both staff and service users, please provide data on both.

Section 75 Group	Make up of affected groups?
Age	Children Primarily aged 4-11 and parents of these children. From most recent census (20/21), 18 pupils are at Foundation Stage, 13 pupils are at Key Stage 1 and 18 at Key Stage 2 (20/21 census figures). Staff – Information on the age profile of staff not available at school level.
Dependants	Pupils aged between 4-11 and the parents/carers of these 49 pupils. Staff – Information on the dependents of staff not available at school level.
Disability	On most recent available census (20/21), it was recorded that 4 pupils have a statement of educational needs. Staff – Information on staff disabilities not available at school level.
Religious Belief	Primarily Roman Catholic. On most recent available census information relating to religion (19/20) 13 were recorded as being from the Roman Catholic Community, 11 Protestant and 26 'other'. Staff – Information on the religious beliefs of staff members not available at school level.
Gender	From most recent available census, 42% of the pupils are male (n=21), whilst 48% are female (n=29). (20/21 census figures). The 1 reception class child is included in the DENI gender breakdown. Information is not available regarding the gender breakdown of staff employed in the school.
Marital Status	There is no data held on the marital status of staff and parents.
Political Opinion	The area would be perceived as a Unionist area. Four out of the six local (Bangor East and Donaghadee) councillors are Unionist. There is no data held on the political opinion of the staff and parents.
Ethnicity	Information relating to ethnicity has been suppressed to prevent the disclosure of information about identifiable individuals
Sexual Orientation	There is no data held on the sexual orientation of the pupils/parents or staff.

Accurate figures are not available on the sexual orientation of the general population, and estimates vary considerably. The Northern Ireland Statistics and Research Agency (NISRA), along with other UK census offices, concluded that the census was not suitable for obtaining such information. The 2011 Census does provide some information, based on same-sex civil partnerships. Research by HM Treasury shows that from 5%-7% of the UK population say they are gay, lesbian, bisexual or 'trans' (transsexual, transgendered and transvestites). The 2010 Northern Ireland Life and Times survey (1,205 adults) reported the figure as only 1%. The Office for National Statistics 2010 report (450,000 respondents) found that in Northern Ireland 92.5% said they were heterosexual and 0.9% of respondents said they were LGB, although 0.4% reported as 'other' and 6.2% said they didn't know or refused to respond. Between 2006 and 2012, there were 715 recorded Civil Partnerships regionally. However, this is not indicative of the LGB population. There are no accurate statistics on sexual orientation in the community as a whole. It is, however, estimated that between 5% and 10% of the population would identify as lesbian, gay or bisexual. Rural Impacts Whilst the Department of Education Sustainable Schools Policy rural enrolment threshold of 105 applies to the school as it is outside Belfast or Derry City, the population of Donaghadee, at 6,780 (2017 - NISRA) places the town in Category E (Small Town) according to the classification set out for settlements in the Rural Needs Act. Some of the school population can be deemed to be rural. There will be an impact on the wider community. There will be increased access to sustainable provision to meet the needs of the rural community.

2.3. Qualitative Data

What are the needs and experiences of the groups that are impacted by this policy or decision?

Are there different needs and experiences for any of the equality groups and what equality issues emerge from this?

Section 75 Group	What are the needs and experiences of the groups as they relate to the policy or decision?
Age	There is no evidence that there would be any impact from this proposal on service users (pupils) and staff according to their age.

	There is a need for age appropriate (4-11 years) provision for pupils in the alternative schools which will differ from year group to year group.
	Staff needs will differ according to age, specifically in terms of retirement, redundancy and redeployment.
Dependents	Under GDPR schools are not obliged to provide data on school-age mothers or fathers. Information is not available regarding staff with dependents. However there is no evidence that there would be any impact from this proposal on service users (pupils) and staff according to their dependants.
Disability	Information on staff regarding a disability as defined by the Disability Discrimination Act 1995 is not available. Pupils with a disability can be impacted where they need to travel further to attend school. This will impact different pupils with different types of disability in different ways. The entitlement to additional support and reasonable adjustments based on the pupils' educational needs will not change.
Religious Belief	There is no evidence that there would be any impact from this proposal on service users (pupils) and staff according to their religious belief. A Catholic school is open to all pupils of all faiths and none. The majority of pupils in this sector are Catholic. St Anne's has a mix of pupils from those from a Catholic, Protestant and 'other' tradition. There is a need for continuation of similar provision for the pupils within reasonable travelling distance.
Gender	The school is co-educational (21 males and 29 females) according to the DE census data (2020/21). There are available school places for both genders. They will both benefit from this proposal with increased peer (age and gender) interaction.
Marital Status	Information on marital status of staff is not available. There is no evidence that there would be any impact from this proposal on parents and staff according to their marital status.
Political Opinion	The area would be perceived as a Unionist area given that four of the six councillors in the 'Bangor East and Donaghadee' area are DUP or UUP. There is a need for provision, within reasonable travelling distance, which takes account of perceived political opinion of pupils.
	There is no known impact on any persons with a particular political opinion.

There is no evidence that there would be any impact from this proposal on service users (pupils) and staff according to their ethnicity.
There is no evidence that there would be any impact from this proposal on service users (pupils) and staff according
to their sexual orientation.

What are the social and economic impacts of the policy of people living in rural areas?

Please consider positive and negative impacts around issues such as access to education or youth provision, transport, broadband accessibility and employment impacts

Rural Impacts

The proposal enables children in rural communities to have access to a quality education in cost effective provision.

There are a number of schools in Northern Ireland which do not meet the SSP. The challenge is to create a portfolio of schools located in the right places to meet demand for school places.

The aim of area planning is to ensure that all pupils have access to a broad and balanced curriculum in sustainable, fit-for-purpose schools.

Analysis shows there is a surplus of school places in this area, this proposal means the number of available places will better match the projected demand in the area.

This proposal will increase the opportunities for pupils living in a rural area to have access to a broad and balanced curriculum and have a larger number of peer interactions in a new educational environment with fewer composite classes.

In addition, children in a rural area, where over 2 miles away from a suitable school will receive transport assistance to a suitable school which meets the requirements of the Sustainable Schools Policy and Every School a Good School.

There will be an impact for pupils as the transfer to another school means they may have a larger number of peer interaction in a new environment. This will be managed by the pastoral care procedures of the new school.

2.4. Policy / Decision changes

Based on the equality issues that have been identified, what changes (mitigation) can you make to the policy in order to better promote equality of opportunity?

In developing the policy or decision, what changes did you make, or do you intend to make to address any equality issues that you identified?

Mitigation is at the forefront of all policy decisions taken. Consideration has been given to a variety of options to continue provision on the site, even with suitable education provision available elsewhere for the pupils. This includes maintaining the status quo; federating with other schools; shared education; integration; amalgamation; and discontinuance of the school, with the pupils moving to alternative schools. These options were discussed with the Board of Governors. It was not apparent there was an alternative option for sustainable provision. The reasons for choosing the discontinuance option are detailed in the Case for Change.

CCMS will also collated information from stakeholders through the pre-publication consultation process. The process did not present any specific sustainable school option, but the process did highlight that stakeholders wanted the retention of school provision in the area, regardless of school type.

The school is used by the local community. In the event the proposal progresses this does not necessarily mean the loss of use of the school premises, with the potential for the building to remain in use as a community hub. This decision would ultimately rest with the Trustees of the school in the event the proposal proceeds.

There will be an impact for pupils as the transfer to another school means they have a larger number of peer interactions in any new environment.

CCMS Education Advisers will work with the school to support the pastoral needs of the pupils as they move to an alternative school.

The decision, designed to meet the aims of the DE Sustainable Schools Policy, aims to have sustainable, viable schools providing pupils with high quality education for their benefit and for the benefit of society as a whole.

Based on the rural impacts that you have identified, what changes (mitigation) can you make to the policy?

We will encourage dialogue between the local community and the parish regarding the future use of the facilities within the school grounds, in the event the proposal proceeds.

In addition, by supporting a successful transition of pupils to sustainable schools, this will help the community to retain and to continue to attract additional families to the area.

PART 3 - GOOD RELATIONS

3.1. Are there any changes to the policy or decision that you would make to better promote good relations?

GROUP	Impact on Good Relations	Policy / Decision Changes
Religion	N/A	No mitigations are proposed to the policy.
Ethnicity	N/A	No mitigations are proposed to the policy.
Political Opinion	N/A	No mitigations are proposed to the policy.

PART 4 - SEC 75 EQUALITY SCREENING DECISION

This section is only relevant to the Section 75 Equality Duties

4.1. How would you categorise the impacts of the policy or decision? Please refer to guidance notes on categorising impacts

Please select:

Major Impact	
Minor Impact	X
No Impact	

4.2. Does the policy or decision require a full Equality Impact Assessment?

Please select:

Yes	
No	X

Please provide reasons for your decision

The provision of an estate of sustainable schools improves educational provision across Northern Ireland. Where we are aware of individual requirements of pupils, we will work closely with the Education Authority and other agencies as required to meet their needs.

PART 5 - DISABILITY DUTIES

5.1. Does the policy or decision encourage the participation of disabled people in public life? Or is there anything you can do within the policy or decision to encourage participation of disabled people in public life?

How does the policy encourage the participation of disabled people in public life?	Is there anything further you can do to encourage the participation of disabled people in public life?
Where pupils are disabled, their introduction into a sustainable school	Expanded pupil opportunity and improved facilities will over time
will have a number of pastoral and educational benefits for them.	encourage the participation of disabled people in public life.

5.2. Does the policy or decision promote positive attitudes towards disabled people? Or is there anything you can do within the policy or decision to promote positive attitudes towards disabled people?

How does the policy promote positive attitudes towards disabled people?	Is there anything further you can do promote positive attitudes towards disabled people?
Where there are disabled pupils, they will have access to a wider range of peers in a larger school and to a wider range of educational pathways.	Where pupils are disabled, their introduction into a new school will enable pupils there to interact positively with new disabled classmates.

PART 6 - HUMAN RIGHTS

6.1. Are Human Rights Relevant?

	Relevant Yes/No	
Article 2:	Right to Life	No
Article 3:	Right to freedom from torture, inhuman or degrading treatment or punishment.	No
Article 4:	Right to freedom from slavery, servitude & forced compulsory labour.	No
Article 5:	Right to liberty and security of person.	No
Article 6:	Right to a fair & public trail in a reasonable time.	No
Article 7:	Right to freedom from retrospective criminal law & no punishment without law.	No
Article 8:	Right to respect for private & family life, home & correspondence.	No
Article 9:	Right to freedom of thought, conscience & religion.	No
Article 10:	Right to freedom of expression.	No

Article 11:	Right to freedom of assembly & association.	No
Article 12:	Right to marry & found a family.	No
Article 14:	Prohibition of discrimination in the enjoyment of the convention rights.	No
Protocol 1, Article 1	Right to a peaceful enjoyment of possessions & protection of property.	No
Protocol 1, Article 2	Right of access to education.	Yes

If you answered 'no' to all human rights considerations, please go to section 7 – monitoring.

6.2. If you have answered yes to any of the Articles, does the policy or decision have a potential positive impact or does it potentially interfere with anyone's Human Rights?

Article number	Positive impact or potential interference?	How?	Any legal issues arise?		
Protocol 1, Article 2	Positive	Access for pupils to sustainable education in the area.	No		
PART 7 – MONITORING					

7.1. What data will you collect to monitor the impact of the policy in terms of

equality of opportunity, disability duties or human rights compliance?

Section 75	Disability Duties	Human Rights
One year after the implementation, we will write to the Board of Governors of the school and request information as to whether there was any unforeseen impact in relation to the protected categories.	One year after the implementation, we will write to the Board of Governors of the school and request information as to whether there was any unforeseen impact in relation to Disability Duties.	One year after the implementation, we will write to the Board of Governors of the school and request information as to whether there was any unforeseen impact in relation to Human Rights.