

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

Cover Note

DP No.	DP 683 DP 673
School	St Anne's Primary School, Donaghadee
Proposal	To decide on the following Development Proposals (DPs): DP 683 – St Anne's PS, Donaghadee will transform to Controlled Integrated Status with effect from 1 September 2023, or as soon as possible thereafter; and DP 673 - St Anne's PS, Donaghadee will discontinue with effect from 31 August 2022, or as soon as possible thereafter.
Permanent Secretary's Decision	<u>Do not approve DP 683</u> - St Anne's PS, Donaghadee will transform to Controlled Integrated Status with effect from 1 September 2023, or as soon as possible thereafter; and <u>Approve with modification</u> (to implementation date) - DP 673 - St Anne's PS, Donaghadee will discontinue with effect from 31 August 2023, or as soon as possible thereafter.
Date of Decision	8 June 2023
Permanent Secretary's Comments	Having read all of the information, evidence and letters of support and objection provided to me in the submission from officials, I have carefully considered these Development Proposals in respect of St Anne's PS and I would make the following comments: In the absence of a Minister for the Department, The Northern Ireland (Executive Formation etc) Act 2022 enables me to make a decision with regard to these development proposals and I am satisfied that it is in the public interest to do so. DP 683: St Anne's Primary School will transform to Controlled Integrated Status, with effect from 1 September 2023, or as soon as possible thereafter. The Department must be cognisant of its statutory duty to encourage, facilitate and support the development of integrated education, which extends to supporting schools that wish to transform to integrated status by demonstrating that they can become viable and sustainable as measured against the Department's transformation guidance. The Department must be convinced that this will be to the benefit of the educational

experience of all pupils which can only be achieved through the delivery of sustainable and viable provision. In this context, the historic low enrolment at St Anne's PS is a key concern in relation to the long term sustainability of education provision at the school.

The assessment of DP 683 for St Anne's PS against the Transformation guidance (Integration Works) and underpinning criteria highlights that the school has made efforts and garnered community support for the proposal to transform; however, it also highlights that enrolment numbers continue to fall significantly below the SSP minimum enrolment threshold for a sustainable primary school. The projected enrolments put forward in the case for change do not demonstrate that the school can reach sustainable enrolment thresholds.

While the school has sought Transformation to controlled integrated status, the evidence is not suggestive of a successful outcome. In addition, there are two existing integrated primary schools within reasonable travel distance of St Anne's PS, both of which have had available places in each of the past five years. This indicates in broad terms, that existing demand for integrated education in the area is currently being and can continue to be met.

Overall, the evidence presented to me demonstrates that there remain considerable concerns regarding the ability of St Anne's PS to meet the sustainability criteria and, based on the evidence in the submission and having read all of the submission and associated appendices and taking all of these matters into account, I have decided to **not approve** the transformation to Controlled Integrated status.

DP 673: St Anne's Primary School will discontinue with effect from 31 August 2023, or as soon as possible thereafter

The historic low enrolment at St Anne's PS is a key concern in relation to the sustainability of education provision at the school. There is no compelling evidence that the continuation of St Anne's PS would result in the delivery of sustainable provision for pupils of the school. Evidence set out in the submission shows that the school has been significantly below the SSP minimum enrolment threshold for a sustainable primary school (both urban and rural) in each of the past five years, with no indication that this position will improve in the future. Falling enrolments provide challenges for a school to overcome in order to provide a high-quality educational experience for its pupils.

The overall enrolment at the school improved in 2022/23, in spite of the threat of closure, slightly increasing from 50 pupils in 2021/22 to 58 pupils in 2022/23. However, at the conclusion of the 2023/24 admissions process, St Anne's PS received and accepted only five first preference applications. There are 13 pupils in Y7 at

	<p>the school expected to transfer to post-primary in 2023/24 which will see the total enrolment reduce to below 50.</p> <p>Having read all of the submission and associated appendices and taking all of these matters into account, I have taken the decision <u>to approve the proposal to discontinue the school.</u></p> <p>In <u>approving the discontinuance</u> of St Anne's PS I am aware that local Catholic Maintained provision will be removed. However, the evidence shows that there are available places at alternative Catholic maintained schools in both Newtownards and Bangor, and transport would be provided to those pupils who are eligible.</p> <p>The discontinuance of St Anne's PS would require the provision of home-to-school transport for certain pupils; however, given the numbers involved, it would be anticipated that the financial implications for the Transport budget would not be significant. Any transport arrangements will be in accordance with transport regulations and identified preference school.</p> <p>In implementing my decision, the Council for Catholic Maintained Schools, as Managing Authority, must ensure the needs of children and parents (including those who have a Statement of Special Educational Need) are addressed through closure/transfer arrangements.</p>								
Additional notes									
Information redacted	<p>Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.</p> <table border="1" data-bbox="587 1211 1453 1505"> <thead> <tr> <th data-bbox="587 1211 703 1252">Key</th> <th data-bbox="703 1211 1453 1252">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="587 1252 703 1323">X ■</td> <td data-bbox="703 1252 1453 1323">Redaction</td> </tr> <tr> <td data-bbox="587 1323 703 1395">*</td> <td data-bbox="703 1323 1453 1395">refers to less than five cases where data is considered sensitive</td> </tr> <tr> <td data-bbox="587 1395 703 1505">#</td> <td data-bbox="703 1395 1453 1505">means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure</td> </tr> </tbody> </table>	Key	Details	X ■	Redaction	*	refers to less than five cases where data is considered sensitive	#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure
Key	Details								
X ■	Redaction								
*	refers to less than five cases where data is considered sensitive								
#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure								

From: Bill Stevenson
Area Planning Policy Team (East Region)
(Cleared by Janis Scallon – 21 March 2023)

Date: 21 March 2023

To: Dr Mark Browne
Permanent Secretary

Copy distribution below

DEVELOPMENT PROPOSALS (DPs) 683 & 673 – ST ANNE’S PRIMARY SCHOOL (PS), DONAGHADEE – PUBLISHED DPs

Issue:	<p>To decide on the following Development Proposals (DPs) published in relation to St Anne’s Primary School (PS), Donaghadee; namely:</p> <ul style="list-style-type: none">• DP 683 – St Anne’s PS, Donaghadee will transform to Controlled Integrated Status with effect from 1 September 2023, or as soon as possible thereafter; and• DP 673 - St Anne’s PS, Donaghadee will discontinue with effect from 31 August 2022, or as soon as possible thereafter.
Timescale:	<p>URGENT</p> <p>As Stage 1 of the 2023/24 admissions process has already concluded, a timely decision would help parents and Managing Authorities to plan next steps.</p>
Financial/Resource Implications:	<p><u>DP 683</u></p> <p><u>Capital</u> There are no immediate financial costs associated with this proposal.</p> <p><u>Accommodation</u> No accommodation would be required for day one. If approved, and pupil enrolment increases, an additional modular classroom would be required by 2024/25.</p> <p>The cost of a single modular is currently in the region of £200k.</p>

	<p><u>Staffing</u> The school's financial plan, should approval for transformation be approved, is to employ a fourth teacher in the school year commencing 2024.</p> <p><u>Transport</u> Transformation may lead to an increase in the number of pupils requiring transport.</p> <p><u>DP 673</u></p> <p><u>Capital</u> None.</p> <p><u>Budget</u> Closure may result in an operational saving (unquantified) in terms of recurrent costs.</p> <p><u>Accommodation</u> It is not anticipated there will be any accommodation costs to facilitate the closure of St Anne's PS.</p> <p><u>Staffing</u> Teaching and non-teaching staff would be afforded employment protection under the respective School Re-organisation Arrangements and are eligible for re-deployment under transfer redundancy arrangements. Costs cannot be determined at this stage due to the variables involved.</p> <p>It is not possible to predict the number of redundancies or redeployments in advance of a decision; therefore, it is not possible to cost these accurately at this time.</p>
FOI Implications:	The contents of this submission are likely to be fully disclosable.
Statutory Duty Implications:	<p><u>DP 683</u> Education Reform (NI) Order 1989 (Article 64) – statutory duty to encourage, facilitate and support the development of Integrated Education The Integrated Education Act (Northern Ireland) 2022</p> <p><u>DP 673</u> The Shared Education (NI) Act 2016 Article 44 of the Education and Libraries (NI) Order 1986</p>
Presentational Issues:	It is likely that there will be considerable local stakeholder and media interest in your decisions. If approached, Press Office will liaise with officials as required.

Recommendation:

It is recommended that you consider the evidence and information in this submission and attachments and agree to the following:-

- i. do not approve DP 683 - St Anne's PS, Donaghadee will transform to Controlled Integrated Status with effect from 1 September 2023, or as soon as possible thereafter;**
- ii. approve with modification (to implementation date) - DP 673 - St Anne's PS, Donaghadee will discontinue with effect from 31 August 2023, or as soon as possible thereafter; and**
- iii. agree that this submission (with the appropriate redactions) will be published on the Department's website once the Education Authority (EA) and the school have been informed.**

ST ANNE'S PRIMARY SCHOOL (PS), DONAGHADEE – DEVELOPMENT PROPOSALS (DPs)

- **DP 683 - Transformation to Controlled Integrated Status**
- **DP 673 - Discontinuance**

SUBMISSION CONTENTS	
Cover Submission	<ul style="list-style-type: none"> ○ Format of considerations ○ Submissions Summary (Sections 1 to 6) ○ Options for approval ○ Final recommendations
Section 1 <i>Overview</i>	<ul style="list-style-type: none"> ○ Maps ○ Introduction ○ School and Geographical Area ○ Area Planning Context ○ Snapshot
Section 2 <i>DP 683 –Transformation</i>	<ul style="list-style-type: none"> ○ Background ○ Transformation process ○ Special Considerations ○ Case for Change ○ Statutory Process ○ DE assessment against considerations against Transformation Criteria ○ Assessment of Special Considerations ○ Conclusion
Section 3 <i>DP 673 – Closure</i>	<ul style="list-style-type: none"> ○ Background ○ Area Planning Context ○ Special Considerations ○ Case for Change ○ Statutory Process ○ SSP Assessment ○ Assessment of Special considerations ○ Conclusion
Section 4 <i>Assessment of Impact /options</i>	<ul style="list-style-type: none"> ○ Options ○ Benefits and Risks ○ Supporting contextual issue <ul style="list-style-type: none"> ▪ NDND ▪ PFG ▪ Access to education ▪ Duty – Article 64 ○ Overall Conclusion ○ Decision Sheet
<i>Attached Separately</i>	
Section 5	DP 683 - Appendices
Section 6	DP 673 - Appendices

INTRODUCTION

Format of Considerations

1. This submission relates to two published Development Proposals (DPs) for St Anne's Primary School (PS), a co-educational Catholic maintained school situated in the village of Donaghadee, Co Down.
2. DP 683 proposes to transform the school to Controlled Integrated status and DP 673 proposes the discontinuance of the school. This submission includes the assessment of both proposals to ensure you are fully apprised of all inter-related issues prior to taking any decision.
3. You should note that when a proposal for discontinuance has been brought forward under Article 14 of the Education and Libraries (Northern Ireland) Order 1986 alongside a proposal for Transformation to Controlled Integrated status, in accordance with Article 92 (ie proposals for acquisition of controlled integrated status) and Article 94(4) of the Education Reform (NI) Order 1989, the legislation requires that ***“the Department shall consider both proposals together but shall not determine the proposal under Article 14 (ie DP 673) until it has made its determination with respect to the proposal for acquisition of controlled integrated status” (ie DP 683)***. In effect, procedurally a decision must be taken on the Transformation prior to any decision regarding discontinuance. It is recognised that these are separate decisions; however, the assessment naturally has significant inter-dependent considerations.

Submission Summary (Sections 1-6)

4. This submission has been structured to facilitate procedural requirement as follows:-
 - Section 1: Overview
 - Section 2: Transformation DP (683)
 - Section 3: Closure DP (673)
 - Section 4: Assessment of Impact/Options
 - Section 5: DP 683 – Appendices
 - Section 6: DP 673 – Appendices

Options for Approval

5. There are two options to consider in this case, namely:-
 - Option 1: DP 683 – *approve* the school's 'transformation'. As education provision at St Anne's PS would continue, albeit as a different management type, then your decision on DP 673 (discontinuance) is limited to non-approval to facilitate the approval of DP 683 for transformation;

- Option 2: DP 683 – *do not approve* the school’s ‘transformation’. This would result in options for your decision on DP 673 being either approval or non-approval which will determine whether or not St Anne’s PS closes or remains open under its existing management type.

Final Recommendations

6. The following recommendations on DP 683 and DP 673 have been made taking account of all information submitted in relation to this proposal and are based on the Department’s assessment and application of its statutory duties. It is recommended that you:-
- consider the information and assessments contained in Sections 1-4 of this submission together with the supporting information in Sections 5 and 6;
 - agree to the following recommendations, making your decisions in the order set out as required by the legislation:

Decisions	Development Proposal	Recommendation	Proposed Outcome
1.	DP 683 – Transform	Do not approve	St Anne’s PS will not transform to Controlled Integrated status on 1 September 2023.
2.	DP 673 – Closure	Approve	St Anne’s PS will close with effect from 31 August 2023

7. A decision sheet on which to record your decisions is attached at Section 4.
8. Should you wish to discuss the content of this submission, please do not hesitate to contact me.

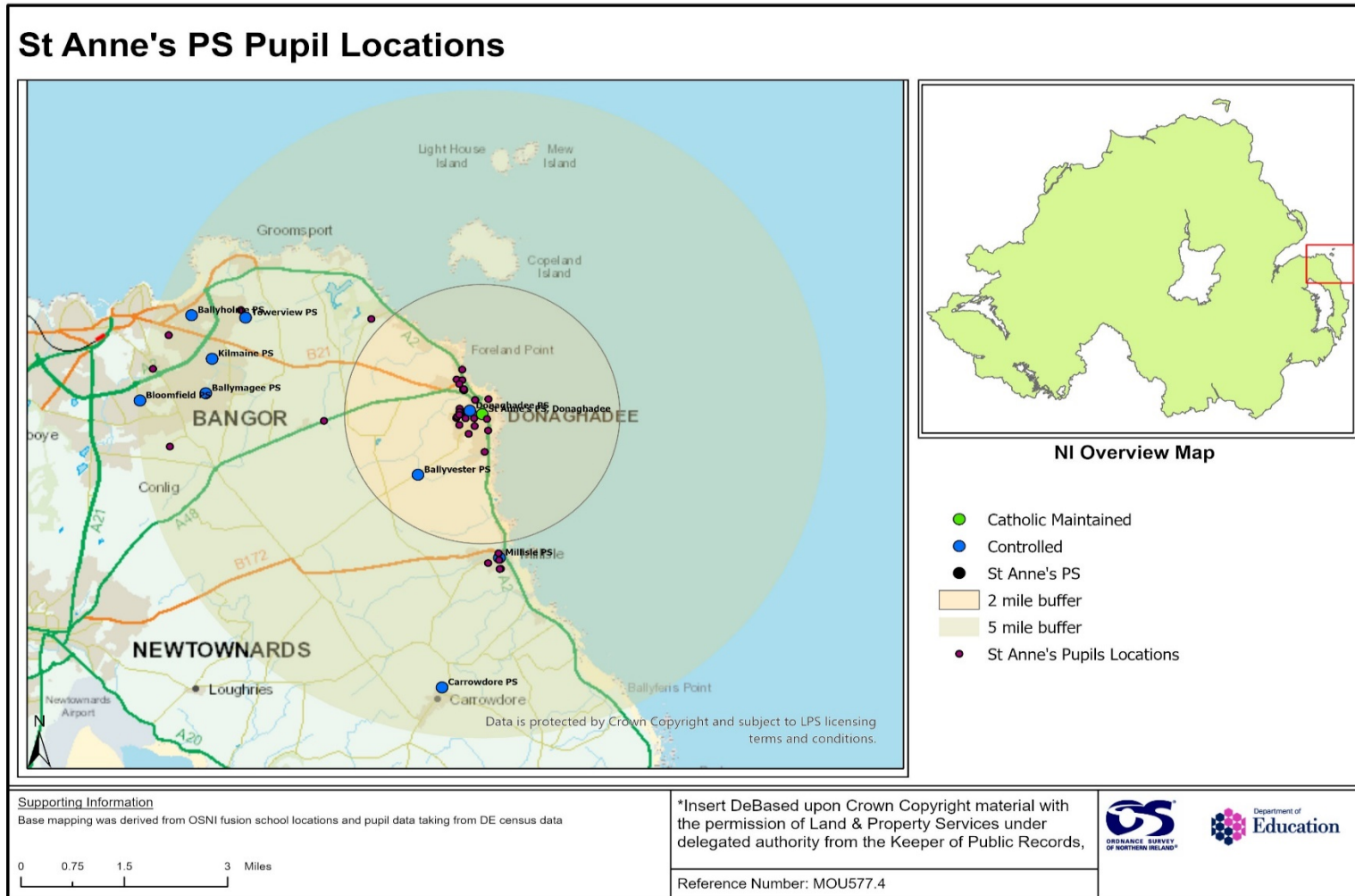
Bill Stevenson ☎ 59310

Bill.Stevenson@education-ni.gov.uk

Copy distribution:

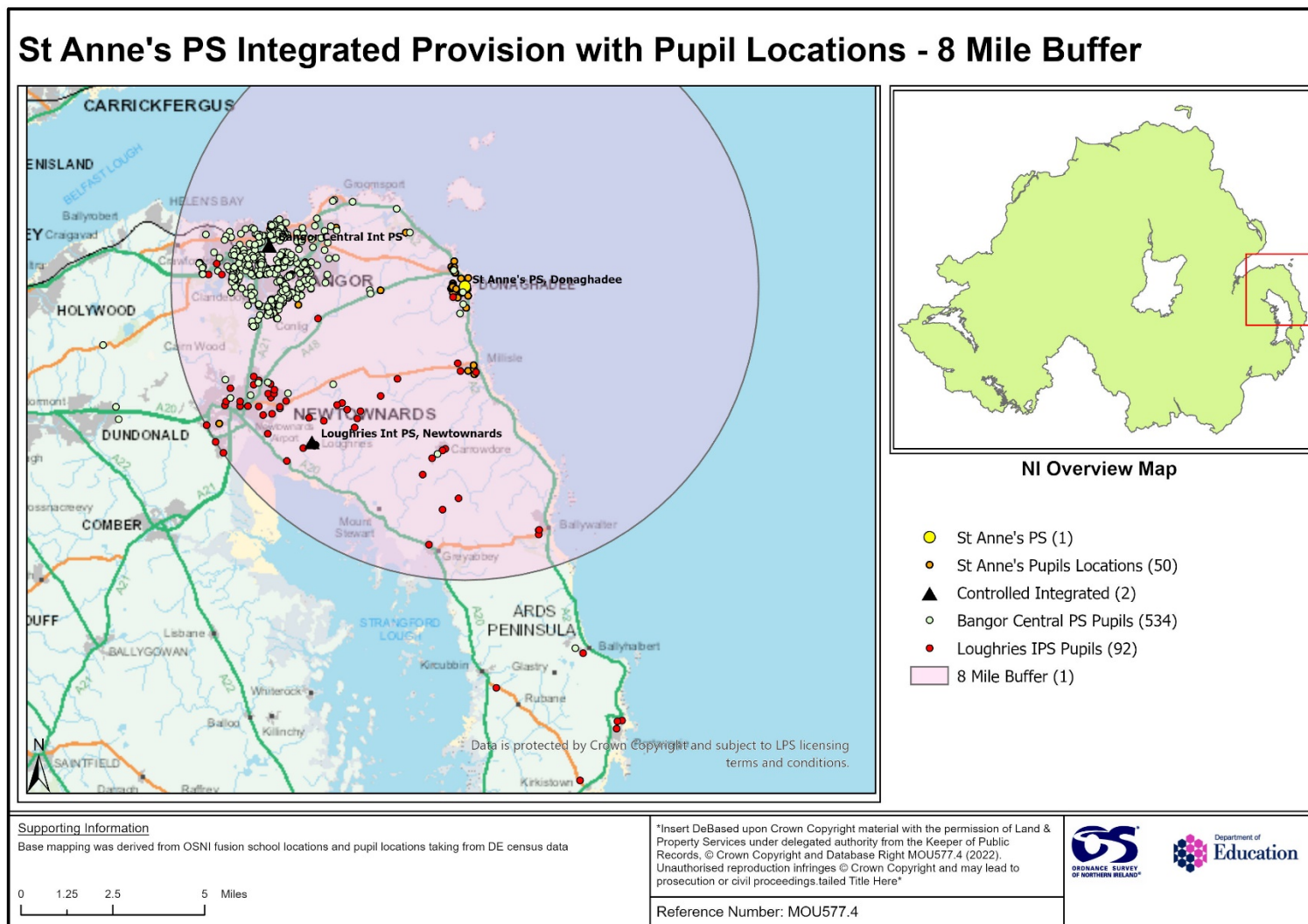
*Linsey Farrell
Lianne Patterson
John Smith
Faustina Graham
Janis Scallon
Eamonn Broderick
Sharon Taylor
Lorraine Finlay
APPT
Press Office*

Map 1: St Anne's PS - Alternative provision and pupil locations – 5 mile mapping radius

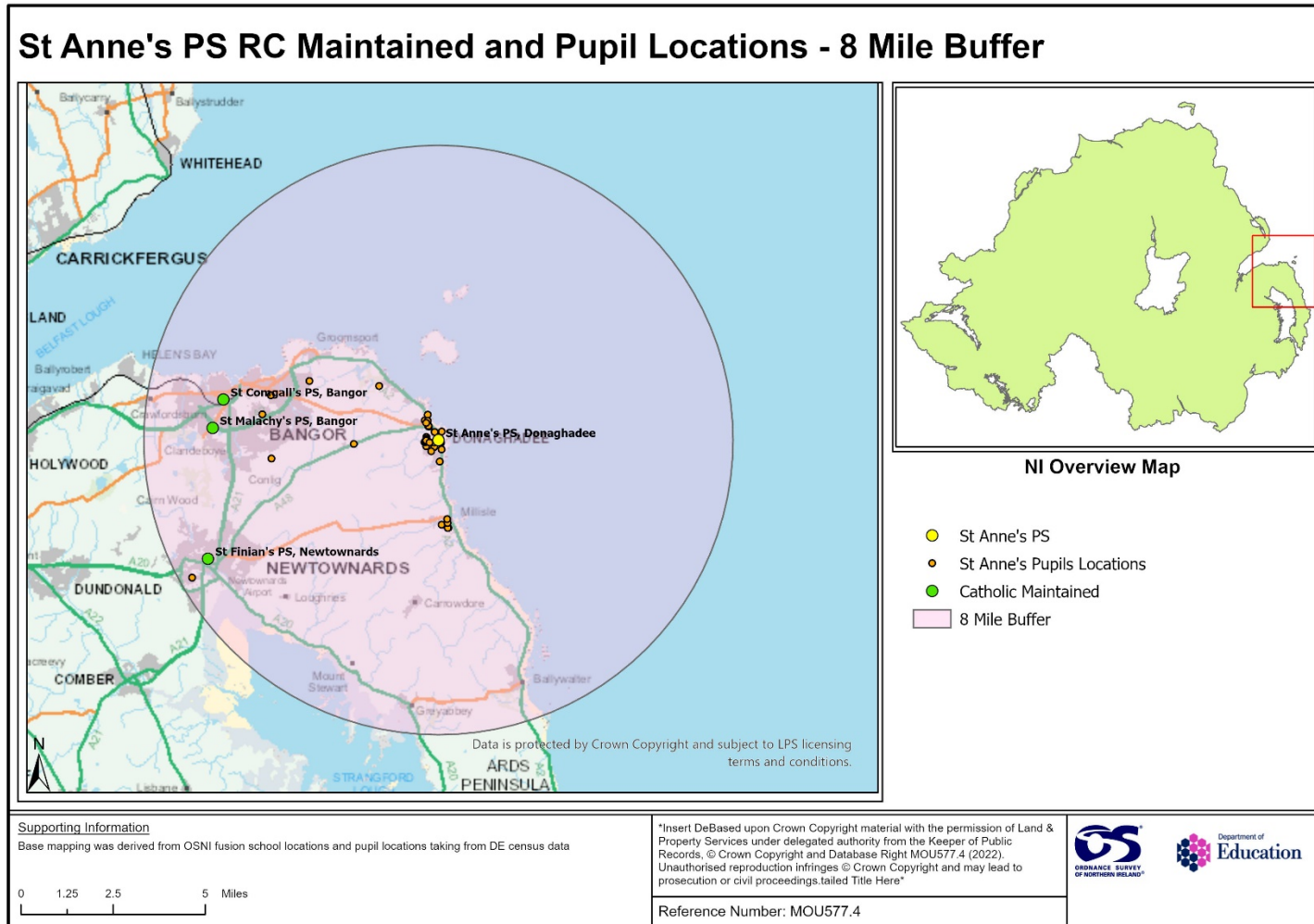


***Note: No other provision other than Controlled provision is within a five-mile radius of St Anne's PS**

Map 2: St Anne's PS - Alternative integrated provision and pupil locations – 8 mile mapping radius



Map 3: St Anne's PS - Alternative Catholic maintained provision and pupil locations – 8 mile mapping radius



SECTION 1: OVERVIEW

Introduction

9. Two DPs have been published relating to St Anne's PS. They are:-
- DP 683: Proposer – St Anne's PS' Board of Governors (BoG) – proposing that *“St Anne's Primary School will transform to Controlled Integrated status with effect from 1 September 2023, or as soon as possible thereafter”*.
 - DP 673: Proposer – Council for Catholic Maintained Schools (CCMS – on behalf of the Trustees of St Anne's PS) proposing that *“St Anne's Primary School will discontinue with effect from 31 August 2022, or as soon as possible thereafter”*.

School

10. St Anne's PS has been operating on its current site in the town of Donaghadee since 1932. The school has approved admissions and enrolment numbers of 11 and 76 respectively, in 2022/23 the school had an enrolment of 58, including:-
- five pupils in Year 1;
 - five (10%) pupils with a Statement of Special Educational Needs (SEN);
 - 31 (53.4%) pupils with Free School Meal Entitlement (FSME); and
 - 23 available places.

Strategic Area Plans

11. The *‘Providing Pathways’ - Strategic Area Plan for School Provision 2017-20* and the (extended) *Annual Action Plan for School Provision April 2019 –March 2021* were published by the Education Authority (EA) on 28 April 2017. The Area Plan notes that in the Ards & North Down Local Government District (LGD) the population in the age range 0-15 years is projected to decrease by 2.3% between mid-2014 and mid-2024.
12. The Annual Action Plan (AAP) contains an entry relating to St Anne's PS with the key issue identified as *“Address school provision where sustainability is an issue”* and associated action *“Managing authority to consult on options for future provision at St Anne's PS by May 2020”*.
13. The second Strategic Area Plan (SAP2) was published by the EA on 29 June 2022 and covers the years 2022 to 2027. SAP2 states *‘The managing authorities and sectoral bodies in their statutory duty will seek to identify, explore and bring forward proposals to encourage and facilitate both Irish Medium and Integrated education to provide sustainable education for an area. Both Comhairle na Gaelscolaíochta and the Northern Ireland Council for Integrated Education will provide guidance on innovative sustainable provision, working with all education partners in achieving Area Planning solutions, including the option for individual schools to transform to integrated status.’*

14. The new SAP is supported by the first Operational Plan (OP1) and there are no work streams relating to St Anne's PS in the plan.

Area Context

15. On the Northern Ireland Multiple Deprivation Measure 2017, the Donaghadee South 2 Super Output Area (in which St Anne's PS is situated) is placed 597 out of 890 (1 being most deprived and 890 least deprived).

Alternative Provision in the Area

16. Map 1 illustrates the alternative education provision within a five-mile mapping radius, while a snapshot of alternative provision in the area, detailing the admissions and enrolment data and the latest Education Training Inspectorate (ETI) inspection assessment, is attached at Table 1. They highlight the following.

Alternative Catholic Maintained Provision

17. Map 1 shows that there are no alternative Catholic Maintained primary schools within a five-mile mapping radius of St Anne's PS; Map 3 shows that there are two Catholic Maintained schools within a seven-mile mapping radius (St Comgall's PS and St Malachy's PS) and one further school located just beyond this area (St Finian's PS). Table 1 shows that when considered together, for 2022/23 these schools have approved admissions and enrolment of 131 and 937 respectively; in 2022/23 the schools had actual admissions of 97, actual enrolment of 817 and 157 available places. The most recent, completed ETI inspections indicate that there are no known concerns regarding the quality of education provided at these schools.

Alternative Controlled Provision

18. Map 1 illustrates that there are nine Controlled primary schools within a five-mile mapping radius of St Anne's PS. Table 1 shows, when considered together, for 2022/23 these schools have approved admissions and enrolment of 485 and 3,408 respectively; in 2022/23 these schools had actual admissions of 439, actual enrolment of 3,282 and XX available places. Donaghadee PS reduced its approved enrolment number from 466 in 2021/22 to 420 in 2022/23 as part of the Department's 'resetting' exercise. The assessment of the quality of education provided at these schools from the most recent, completed ETI inspections indicates no known cause for concern.

Alternative Integrated Provision

19. Map 1 demonstrates that there are no alternative integrated primary schools within five miles (mapping radius) of St Anne's PS. Two schools – Bangor Central Integrated PS (IPS) and Loughries IPS - are within a seven-mile mapping radius. Table 1 shows that for 2022/23, when considered together, these schools had approved admissions of 102 and approved enrolment of 712; in 2022/23 these schools had actual admissions and enrolment of 69 and 585 respectively and 153 available places. The most recent, completed ETI inspection of Loughries IPS assessed the quality of education as "Good" and the most recent ETI inspection of Bangor Central IPS assessed the quality of education as "Very Good".

St Anne's Primary School - Primary Provision

DE Ref No	School & Postcode	Urban/Rural	Distance in Miles by Road Google Maps	2022/23 & 2023/24 Approved Enrolment Number	2020/21 Actual Enrolment (Includes supernumerary pupils)	2021/22 Actual Enrolment (Includes supernumerary pupils)	2022/23 Actual Enrolment (Includes supernumerary pupils)	2022/23 Supernumerary pupils	2022/23 Available Places	2022/23 Actual Yr 1 Admissions (includes supernumerary pupils)	2022/23 & 2023/24 Approved Admissions Number	2023/24 Total Yr 1 First Preference Applications	2023/24 Over/Under Subscribed at First Preference	ETI reports Date of Inspection / Overall assessment
4033008	St Anne's PS BT21 0HY	Urban	-	76	49	50	58	5	23	5	11	5	U - 6	Sept. 2018 - High level of capacity for sustained self-improvement.
RC Maintained														
4036146	St Comgall's PS BT20 3DS	Urban	6.5	290	303	304	303	12	0	42	41	50	O - 9	May 2017 - Continues to demonstrate a high level of capacity for sustained improvement.
4036148	St Malachy's PS BT19 1AA	Urban	6.9	437	386	359	351	19	105	41	60	30	U - 30	Nov 2019 - ASOS June 2013 - Good
4033017	St Finian's PS BT23 7AD	Urban	8.2	210	164	160	163	5	52	14	30	15	U - 15	Oct. 2019 - ASOS June 2016 - Demonstrates the capacity to identify and bring about improvement.
Sub total				1013	902	873	875	41	180	102	142	100		
Controlled														
4011654	Donaghadee PS BT21 0BD	Urban	0.4	420	388	399	387	20	53	57	60	53	U - 7	Oct. 2017 - Continues to demonstrate a high level of capacity for sustained improvement.
4011265	Ballyvester PS BT21 0NF	Rural	1.6	109	111	110	109	*	*	16	16	17	O - 1	Sept. 2018 - ASOS Feb. 2012 - Very Good
4011681	Millisle PS BT22 2DD	Rural	2.3	225	192	189	193	10	42	30	30	22	U - 8	Feb. 2020 - ASOS Feb. 2017 - High level of capacity for sustained improvement.
4016430	Ballymagee PS BT19 6ZG	Urban	4.6	406	404	403	391	15	30	47	58	45	U - 13	Jan. 2019 - ASOS June 2011 - Outstanding
4016192	Kilmaine PS BT19 6EF	Urban	4.6	610	616	613	610	15	15	81	87	81	U - 6	May 2018 - ASOS April 2015 - Very Good
4016111	Towerview PS BT19 6AZ	Urban	4.8	406	408	413	402	23	27	47	58	48	U - 10	Sept. 2019 - ASOS March 2012 - Very Good
4016020	Carrowdore PS BT22 2JJ	Rural	5	194	167	165	166	10	38	19	28	12	U - 16	Dec. 2018 - ASOS April 2012 - Good
4011650	Ballyholme PS BT22 2JJ	Urban	5	630	625	622	628	25	27	92	90	77	U - 13	September 2016 - High level of capacity for sustained improvement.
4013023	Bloomfield PS BT19 7PN	Urban	5.9	408	409	411	396	27	39	50	58	41	U - 17	April 2018 - ASOS April 2015 - Good
Sub total				3408	3320	3325	3282	#	#	439	485	396		

DE Ref No	School	Urban/Rural	Distance in Miles by Road Google Maps	2022/23 & 2023/24 Approved Enrolment Number	2020/21 Actual Enrolment (Includes supernumerary pupils)	2021/22 Actual Enrolment (Includes supernumerary pupils)	2022/23 Actual Enrolment (Includes supernumerary pupils)	2022/23 Supernumerary pupils	2022/23 Available Places	2022/23 Actual Yr 1 Admissions (includes supernumerary pupils)	2022/23 & 2023/24 Approved Admissions Number	2023/24 Total First Preference Applications	2023/24 Over/Under Subscribed at First Preference	ETI reports Date of Inspection / Overall assessment
Integrated														
4051680	Bangor Central IPS BT20 4TF	Urban	6.2	610	550	534	496	14	128	59	87	62	U - 25	March 2019 - ASOS May 2011 - Very Good
4056710	Loughries IPS BT23 8SR	Rural	7.2	102	86	92	89	12	25	10	15	5	U - 10	June 2018 - ASOS Dec. 2014 - Very Good
Sub total				712	636	626	585	26	153	69	102	67		
Grand Totals				5133	4858	4824	4742	#	#	610	729	563		

ASOS - Action short of Strike

Actual enrolments and admissions include supernumerary pupils and exclude reception pupils (as per annual Census information).

1st Pref. applications exclude reception & statemented pupils. Total of 1st prefs. at the start of the Primary School Admissions process for the 2023/24 school year, info provided by the EA on 6.2.2023

St Comgall's PS received 4 reception age 1st pref. applicants for the 2023/24 School Year, info provided by the EA on 6.2.2023

St Anne's PS had 1 reception pupil in the 2020/21 School Year - they had no reception pupils in the 2021/22 or 2022/23 School Years. Also, they have no reception age 1st prefs. for the 2023/24 School Year.

St Finian's PS approved numbers reduced from 233/30 to 210/30 for the 2022/23 school year as part of the DE Resetting exercise.

Donaghadee PS approved numbers reduced from 466/60 to 420/60 for the 2022/23 school year as part of the DE Resetting exercise.

Bangor Central IPS approved numbers reduced from 618/88 to 610/87 for the 2022/23 school year approved by DE School Admissions Team (following advice from DE Fresh Start Team).

SECTION 2: DP 683 – TRANSFORMATION

Background

20. DP 683 has been progressed by the BoG of St Anne’s PS under Article 92 of the Education Reform (NI) Order 1989 (ie proposals for acquisition of controlled integrated status). The proposal was published on 16 June 2022 by the EA, on behalf of the school’s BoG, following a successful ballot held in accordance with Article 70 of the 1989 Order (as applied by Article 91).
21. A copy of the published proposal and the BoG’s supporting Case for Change (CfC) are attached at Section 5 Appendices A and B respectively.
22. DP 683 proposes that *“St Anne’s Primary School will transform to Controlled Integrated Status, with effect from 1 September 2023, or as soon as possible thereafter”*.
23. The statutory objection period in respect of the proposal ran from the date of its publication until 14 October 2022, having been extended to allow a full consultation during normal term-time.

Transformation Process

24. To support schools applying to Transform under Article 92 of the Education Reform (NI) Order 1989, the Department’s guidance (*“Integration Works – Transforming Your School (2017)”*) sets out the process to be followed for proposals of this type. The guidance can be found on the Department’s website at the following link: <https://www.education-ni.gov.uk/publications/integration-works-transforming-your-school-guidance>. The key considerations for transformation proposals include the following areas of assessment:-
 - **Unmet demand for Integrated education** (degree of support within the school; availability of Integrated education in the local area; and expressions of interest);
 - **Sustainability** (Sustainable Schools Policy (SSP) considerations and capacity to ensure high quality provision);
 - **The Area Planning Context** (in relation to the wider network of schools);
 - **Religious Balance** (Article 92 (6) of the 1989 Education Reform (NI) Order); and
 - **Planning and Engagement in the Transformation Process** (School’s commitment to Integrated Education and the potential for a successful transformation).

Special Considerations

The Integrated Education Act (Northern Ireland) 2022 and the statutory duty to encourage, facilitate and support the development of integrated education.

25. The Department of Education (DE) has a statutory duty under Article 64 of the Education Reform (Northern Ireland) Order 1989, as amended “*to encourage, facilitate and support the development of integrated education*”.
26. The Integrated Education Act (Northern Ireland) 2022 came into operation on 26 October 2022. The Act amends the definition of Integrated education and what it means to be an integrated school.
27. The new Act amends and extends the duty on the Department under Article 64 of the Education Reform (NI) Order 1989 to include “support” as defined in the Act.

The Integrated Education Act (Northern Ireland) 2022

28. The Integrated Education Bill was introduced as a Private Member’s Bill on 1 June 2021 by Kellie Armstrong, MLA. It was passed at Final Stage on 9 March 2022 and having received Royal Assent came into force from 26 October 2022.

- The Integrated Education Act (Northern Ireland) 2022 defines the Meaning of “integrated education” as:

1—(1) “Integrated education” means the education together, in an integrated school, of—

- (a) those of different cultures and religious beliefs and of none, including reasonable numbers of both Protestant and Roman Catholic children or young persons;
- (b) those who are experiencing socio-economic deprivation and those who are not; and
- (c) those of different abilities.

(2) An “integrated school” is a school which—

- (a) intentionally supports, protects and advances an ethos of diversity, respect and understanding between those of different cultures and religious beliefs and of none, between those of different socio-economic backgrounds and between those of different abilities, and

(b) has acquired—

- (i) grant-maintained integrated status, or
- (ii) controlled integrated status

under the Education Reform (Northern Ireland) Order 1989.

(3) Subsections (1) and (2) apply for the purposes of—

- (a) this Act;
- (b) the Education Reform (Northern Ireland) Order 1989;

- (c) section 2(3A) of the Education Act (Northern Ireland) 2014 (inserted by section 4 of this Act);
- (d) the Shared Education (Northern Ireland) Act 2016; and
- (e) any other provision of Northern Ireland legislation (unless it contains a different definition).

- It also sets out the purpose of integrated education as:

2. The purpose of integrated education is—

- (a) to deliver educational benefits to children and young persons;
- (b) to promote awareness and appreciation of human rights;
- (c) to promote equality of opportunity;
- (d) to promote good relations; and
- (e) to promote respect for identity, diversity and community cohesion.

Shared Education Act

- 29. The Shared Education Act (Northern Ireland) 2016 confers a duty on the Department to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.
- 30. The Shared Education Act is underpinned by “Sharing Works – A Policy for Shared Education”, which describes how shared education is expected to work in practice. Together, the Act and the policy provide a framework for the advancement of shared education.

CASE FOR CHANGE (CfC)

- 31. The BoG’s CfC asserts that the Senior Leadership Team (SLT) began initial exploration of transformation potential during 2018 and 2019 and that in October 2019 the Principal had an initial telephone conversation with the Integrated Education Fund (IEF). However, it is further asserted that the onset of the COVID-19 pandemic delayed further consideration until Autumn 2021, with Governors meeting with the IEF on 13 October 2021. The CfC further states that on 19 October 2021 the BoG decided to initiate a parental ballot which was conducted by post from 23 November to 7 December 2021; from a total of 61 eligible voters, 50 (82%) votes were cast with 48 (96%) in favour of transformation, triggering the transformation process.
- 32. The BoG’s CfC provides the following key points of rationale for the proposed Transformation of St Anne’s PS:
 - Unmet demand for Integrated Education as evidenced through the collection of Expressions of Interest Forms and Community Support Forms (assessed further in this submission);
 - High levels of support from parents and the local community;
 - Without specific educational provision for Catholic children, Catholic families are less likely to move into Donaghadee and segregation is exacerbated;
 - Applications and admissions to Strangford Integrated College (IC) and Priory IC indicate parental demand for Integrated Education;

- Messages of support from politicians, community activists, businesses and dozens of others support the concept of Donaghadee having an Integrated primary school;
 - The unmet demand for Integrated Education will enable our school to become sustainable;
 - The experience of recently transformed schools has been a significant increase in enrolment figures;
 - The schools in the environs of St Anne's PS do not currently have the capacity and are not of a suitable type to intake all of St Anne's PS' pupils;
 - DE census data (2021/22) show a total of 20 available places within three miles of the school, all at controlled schools;
 - The nearest Catholic primary school is St Comgall's PS in Bangor, over six miles away and over-subscribed;
 - The transformation of St Anne's PS creates an option in the locality for those parents wishing to have children prepared for sacraments within school;
 - The discontinuation of St Anne's PS would create additional travel costs, it is likely that those low-income families without a car would find it difficult to access a primary school that was both suitable and within reasonable travel distance;
 - Discontinuation of St Anne's PS would diminish options for Catholic families and options for cross-community sharing and collaboration;
 - The school has enjoyed religious diversity for many years.
33. The BoG's CfC confirms that equality screening of these proposals was carried out and the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate) have been considered.
34. The Department has considered the equality issues related to this DP and is satisfied that transformation to Integrated status, whether approved or otherwise, will not adversely impact any of the S75 groups.

STATUTORY DEVELOPMENT PROPOSAL (DP) PROCESSES

Pre-Publication Consultation

35. The EA invited comments from 42 schools which might be impacted by the proposals and received four responses, one agreeing the proposal, two disagreeing with the proposal and a response from the Controlled Schools Support Council (CSSC) that neither agreed nor disagreed with the proposal. Details of the pre-publication consultation are included in the CfC at Appendix B, a summary of the emerging themes is provided below.

Not in Support of the Proposal for Transformation

- Support St Anne's PS as a maintained school offering choice to those desiring faith school;
- Support St Anne's PS as Ballyvester PS has a long-standing link with the school through the Shared Education Programme;

- It is not evident from the figures that Donaghadee requires three controlled schools;
- Donaghadee PS and Ballyvester PS are community schools offering places to all applicants without reference to faith or culture;
- In favour of all schools being integrated but needs to be carefully managed to ensure the quality of education is maintained and resources are not depleted;
- At a time of inadequate investment in education, there is a danger that other schools suffer a decline in budget due to a decline in admission/enrolment trends.

In support of the Proposal for Transformation

- Formal acknowledgement of the excellent work which the Principal and the school have done over a number of years providing for anyone and everyone irrespective of their culture or background;
- Area Planning has already set a precedent for this in granting Loughries PS to transform when there was a far weaker case.

CSSC Comments

- Recognise the inclusive ethos of St Anne's PS, which along with local controlled schools welcomes children of all faiths and none and acknowledges the positive relationships collaboration amongst the schools in the locality and the positive outcome of the parental ballot regarding Transformation;
- Is aware of concerns expressed by several controlled schools and asks that the EA explores the full impact of the proposal on education provision in the area to ensure the proposed transformation will not impact sustainability of alternative controlled provision.

Education Authority (EA) Comments

36. The EA has noted in its commentary that the Authority recognises its duty under the Education Reform (Northern Ireland) Order 1989; however, goes on to say that it is unable to support the proposal for transformation due to there being available places at alternative integrated schools within reasonable travel distance of Donaghadee and that an additional controlled integrated primary in the area could adversely impact established Controlled and Integrated provision.
37. The EA further notes that the current enrolment of St Anne's PS falls considerably below the SSP minimum enrolment threshold.

Two-month Statutory Objection Period

38. The statutory objection period in respect of DP 683 commenced on 16 June 2022 and was extended to 14 October 2022 to facilitate a full consultation during normal term-time. During the objection period, the Department received 217 representations supporting the proposal. These came from a range of respondents, including pupils, staff, parents, politicians, members of the community, IEF and the Northern Ireland Council for Integrated Education (NICIE). The Department received three representations objecting to the proposal, including one from the BoG of a local primary school and one from CSSC. A summary of the representation received can be found at Appendix E, the emerging themes are listed below.

Emerging Themes in Support of the Proposal

- The quality of education and staff at St Anne's PS, including excellent pastoral care and SEN provision;
- The positive school ethos and mix of backgrounds already attending the school;
- Benefits of Integrated Education for local communities, children and Northern Ireland;
- Benefits of an integrated school to Donaghadee;
- An increase in housing in the Donaghadee area and increase in population;
- The ability of the school to become sustainable should transformation be approved;
- Demand/Unmet demand for integrated education;
- Community support for the proposal;
- Increasing enrolment following the school's decision to pursue transformation;
- Strong Shared Education links;
- Over-subscription at alternative local schools;
- Distance of alternative integrated provision;
- Benefits of smaller schools and composite classes to students;
- The impact that closure of the school would have on mental health and well-being of children, particularly following disruption caused by the COVID-19 pandemic;
- An integrated primary school would allow a seamless transfer to Strangford IC;
- The Department's obligations to support and actively assist integrated education emerging from the Integrated Education Act (Northern Ireland) 2022;
- Not approving the proposal and approving its discontinuance would result in children having to travel further away and to bigger schools.

*Emerging Themes **Not** in Support of the Proposal*

- Availability of places at existing, integrated provision (Loughries IPS and Bangor Central IPS);
- No evidence of unmet demand for integrated education in the area;
- Potential impact to the sustainability of neighbouring provision;
- Quality of education at neighbouring provision;
- Low enrolment numbers at St Anne's PS and sustainability issues;
- Financial cost of supporting a small school.

Northern Ireland Council for Integrated Education (NICIE) Comments

- NICIE recognise the substantial community support and parental demand for Integrated education evidenced by community engagements;
- We acknowledge the previous rationale of CCMS to discontinue the school but balance this with the school's increasing enrolment, financial situation and intention to recruit a fourth teacher;
- Alternative integrated options are not convenient or sufficient to meet the demand;
- Unmet demand for integrated education evidenced by Expressions of interest and Community Support forms;
- The school is seeing increased Y1 and in-year intake in spite of a proposal for discontinuation due to prospect of school becoming integrated;
- The school is sustainable in all but one area, that of admissions and enrolment;
- The CfC projects a modestly increasing enrolment and current patterns indicate it could reach its approved enrolment in September 2025;
- Seaview PS, Glenarm provides precedent which saw enrolment increase following a successful parental ballot and transformation;
- The Integrated Education Act 2022 defines the requirement of the Act to support Integrated Education as follows:
 - *'identifying, assessing, monitoring and aiming to meet the demand for the provision of integrated education within the context of area planning...and...'*
 - *'providing sufficient places in integrated schools to aim to meet the demand for integrated education within the context of area planning and the overall sustainability of the school estate (including examining evidence of expected future demand).'*
- In this initial phase of implications and implementation of the Act, these processes are not yet in place and so the principal source of data in relation to this 'demand for the provision' of Integrated Education is the data that has been presented in the CfC by the school;
- The community engagement activity carried out by the school's Transformation Action Group has identified significant demand for Integrated Education in the locality, which had previously been unknown, other than through community surveys carried out by the IEF. For example, 77% of parents surveyed in Newtownards in 2019 said they would support cross-community mergers of schools to rationalise the school system and save money;
- Demand has only come to light now as the area planning process did not have any mechanisms to facilitate these discussions;
- The demand for Integrated education in Donaghadee cannot be met at the existing two integrated primary schools;
- Neighbouring controlled schools do not have a balanced enrolment when one considers the two main traditions;
- St Anne's PS already enjoys community balance;

- It is NICIE's view that the evidenced parental demand in the Donaghadee locality at this time, alongside the Department's duties to encourage, facilitate and support Integrated Education, can be met in a cost-effective manner by the approval of DP 683.

Integrated Education Fund (IEF) Comments

- The CfC highlights the level of engagement with key stakeholders and the high levels of support for transformation;
- The school leadership team have shown commitment to the process throughout;
- Enrolments have already increased following the initiation of this process;
- There is strong evidence of growing parental demand for integrated education in the local area, demonstrated through polling completed by the IEF in May 2019 and May 2021;
- IEF asks the Department to take this decision with regard to the Integrated Education Act (NI) 2022.

Controlled Schools' Support Council (CSSC) Comments

- There are two integrated schools in the surrounding area, neither is over-subscribed;
- Historic enrolment statistics for Bangor Central IPS demonstrate a decline in enrolment;
- 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'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";
- CCMS brought forward the proposal to discontinue due to the unsustainability of the school;
- To achieve the threshold of 140 pupils for sustainable schools, St Anne's PS will need to enrol an additional 13-18 pupils each year over the next five to seven years, taking account of live birth figures by academic year, 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.

Meeting with School Delegation

39. Andrew Muir MLA requested that former Education Minister, Michelle McIlveen MLA, meet with a school delegation to discuss the future of the school. It is customary for requests of this nature, made during the statutory objection period, to be accepted and the Minister visited the school on 1 March 2022. Although the visit was requested during the consultation period in respect of DP 673 and the proposal for discontinuance of provision, the focus of the conversation was the school's proposal for Transformation.

40. A record of the meeting is attached at Appendix G, the key points are largely reflective of those received by the Department during the statutory objection period in respect of DP 683.

Assessment against the Transformation Criteria

41. The '*Integration Works – Transforming your School*' Guidance outlines the key steps for Transformation and the issues the Department will consider when assessing any related proposal. Inputs received from the Department's policy teams and ETI in relation to DP 683 are attached at Section 5: Appendix C and Appendix D respectively. The Department's assessment of DP 683 is as follows.

Unmet Demand for Integrated Education

42. As referenced previously, the CfC states that a ballot for the proposed transformation of St Anne's PS to Controlled Integrated status was conducted by Civica Election Services and took place from 23 November 2021 to 7 December 2021 with an 82% turnout (61 eligible voters, with 50 votes cast) and 96% (48 votes) of respondents in favour of transformation. The turnout and proportion of votes in favour of transformation provide indication of potential demand for Integrated education among parents and guardians of the current cohort of children.
43. The CfC asserts that the school also collected a total of 118 Expressions of Interest forms. The school's Principal updated this information and shows that at the close of the statutory objection period the figure has increased to 150; a reproduction of the revised table is shown below at Table 2. The forms collected show a mix of religious backgrounds and demonstrate interest from parents/guardians of children currently enrolled in primary schools and from parents of children yet to commence primary education. The number of forms received provide indication of potential demand from parents of current and prospective children for integrated education.
44. The Principal of St Anne's PS made representation during the statutory objection period and asserts that five pupils have transferred from neighbouring schools and have cited the prospect of Transformation as their main incentive for doing so.

Table 2 – Expression of Interest Forms

		Catholic		Protestant		Other	
	Total	Number	%	Number	%	Number	%
Currently in school P1-P7	46	8	17%	21	46%	17	37%
Starting School 2022/23	45	6	13%	15	33%	24	53%
Starting School 2023/24	#	*	*	6	*	14	*
Starting School 2024/25	#	*	*	6	*	8	*
Starting School 2025/26	#	*	*	6	*	5	*
Starting School 2026/27	#	0	0%	*	*	6	*

45. In addition to Expression of Interest forms, the CfC further states that support was also received from people who were not parents of primary aged children and the school has collected 167 Community Support Forms. The CfC also states that the school has received messages of support from politicians, community activists, businesses and others who have supported Donaghadee having an integrated primary school (this too is reflected in the representation received by the Department during the statutory objection period).
46. The CfC also provides information regarding a recent Northern Ireland-wide poll conducted by the IEF in 2021 and asserts that 71% of parents stated they were in favour of Integrated education and that in the Ards & North Down LGD, 87% of parents were supportive¹. The methodology section of the quoted poll indicates that the total number of responses received was 2,001. It does not break down the number of respondents who are parents. It is, therefore, a maximum of 1,421 respondents that make up the 71%.
47. NICIE’s commentary on the proposal states that demand for integrated education in the area has only come to light now and asserts “*If the educational bodies outlined in the 2022 Act (EA and DE) had already established processes which identified, assessed, monitored and aimed to meet the demand for Integrated Education in the Donaghadee area, it may be that a meaningful conversation could have been facilitated in the community. The new ‘Future schools Toolkit’, which is aimed at enabling honest and difficult conversations in communities, may have brokered a more joined-up solution to the provision of education in Donaghadee*”. This commentary is not accepted by the Department, which is

¹ <https://lovebelfast.co.uk/wp-content/uploads/2021/08/IEF-Northern-Ireland-Attitudinal-Poll-FINAL.pdf>

not, and has not become under the provisions of the Act, a planning authority in respect of integrated education. NICIE are funded by the Department to encourage and promote Integrated Education and are represented at all levels of the Area Planning Structures. The Department also notes the absence of any specific proposal in either the first or second SAPs and underpinning Annual Action and Operational Plans to examine demand for integrated provision in the Donaghadee area, notwithstanding NICIE’s role as a funded body charged with assisting the Department in furtherance of its duties to encourage, facilitate – and now support - the development of integrated education. The future school’s toolkit referred to above was a project undertaken by Ulster University and has been published on the Department’s website in the Area Planning page (sustainable schools section) since its launch in May 2022.

48. The enrolments of the two nearest integrated primary schools to St Anne’s PS, Loughries IPS and Bangor Central IPS, provide some contrary evidence to the existence of unmet demand for integrated education. Table 3 shows the admissions and enrolment at the two schools over the last five years; Table 4 shows the available places at each school across the same period. As shown in Table 1, Bangor Central IPS has approved admissions and enrolment of 87 and 610 respectively; Loughries IPS has approved admissions of 15 and approved enrolment of 102. Table 3 shows that Loughries IPS has seen its enrolment increase in the previous two years; however, the school saw a small decline in 2022/23 and overall has not reached its approved admissions number, while Bangor Central IPS has seen a gradual reduction to its enrolment over the five year period. Both schools have had available places in each of the past five years.

Table 3 - Alternative Integrated Education Admissions and Enrolment Trends

	2018/19		2019/20		2020/21		2021/22		2022/23	
	Adm	Enrl	Adm	Enrl	Adm	Enrl	Adm	Enrl	Adm	Enrl
Loughries IPS	6	74	13	73	16	86	11	92	10	89
Bangor Central IPS	81	601	66	576	66	550	71	534	59	496

Source: Annual Census Return

Table 4 - Alternative Integrated Provision – Available Places

	2018/19	2019/20	2020/21	2021/22	2022/23
Loughries IPS	32	31	18	19	25
Bangor Central IPS	27	53	79	98	128

49. It is acknowledged that these schools are both in excess of six miles (by road) from St Anne's PS, which may be a contributing factor to the low incidence of pupils from the Donaghadee area; however, it could also be argued that with spaces available at both schools, if there is demand for integrated education in the area, more parents would have chosen to send their children to these schools. You will note from Table 3 that the current enrolment for Loughries IPS is below the SSP threshold and approval for transformation for St Anne's PS could, depending on parental preference, impact on Loughries IPS numbers.

Sustainability

50. The Department's SSP sets out six criteria which have quantitative and qualitative indicators and provide a framework for consideration of a school's longer-term sustainability. An assessment of St Anne's PS as measured against the SSP is provided below:

Criterion 1: Quality Education Experience

Education and Training Inspectorate (ETI) Assessment

51. A Primary Inspection of St Anne's PS was conducted by the ETI in September 2018 and the associated report states that *"In order to promote improvement in the interest of all children, the inspection linked internal and external approaches to evaluate the: outcomes for children with a particular focus on literacy; quality of provision with a particular focus on literacy including across the curriculum and the reception provision; and quality of leadership and management"*. The report also states that the school *"has a high level of capacity for sustained self-improvement in the interest of all learners"*.

Special Educational Needs (SEN)

52. In 2022/23, St Anne's PS has five pupils with a Statement of SEN. The 2018 ETI inspection report notes that *"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"*.
53. The CfC asserts that *"the school is recognised by parents and the community as being a supportive environment for those children with additional needs"*.

Composite Classes

54. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers. Statistics confirm that in 2022/23 St Anne's PS operated three composite classes: Years 1 and 2; Years 3 and 4; and Years 5 to 7. Figures for 2021/22 indicate that the school had 3.2 Full Time Equivalent (FTE) teachers².
55. The 2018 ETI inspection report states that *"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"*.
56. ETI commentary in respect of DP 683 (Appendix D) states that *"In 2020/21, the key stage 2 composite class spanned more than two-year groups with only one child 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."*
57. The CfC asserts that *"the school's current financial plan will enable the employment of a fourth teacher within the lifetime of the current plan"* and later states that the plan is to employ a fourth teacher in the school year commencing 2024.

Pastoral Care

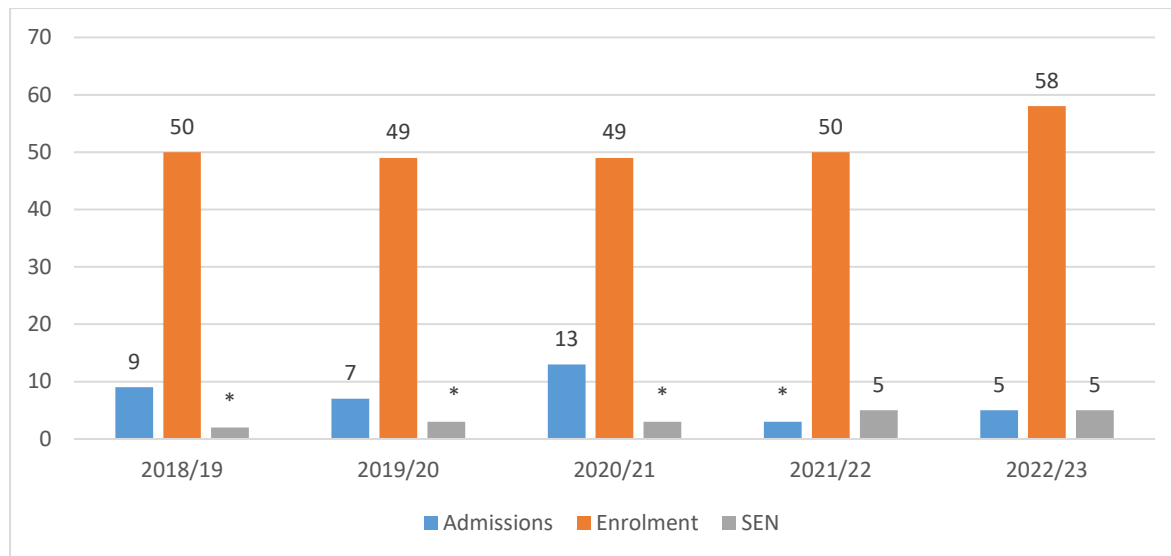
58. The 2018 ETI inspection report states *"that leadership and management promote a shared vision for high standards, excellent pastoral care and individualised support for every child within a caring and inclusive school environment"*.

Criterion 2: Stable Enrolment Trends

59. The SSP states that the minimum enrolment threshold for a sustainable rural primary school is 105 pupils and a sustainable urban primary school is 140. St Anne's PS was previously defined by the SSP as "rural"; however, is now defined by the SSP as "urban" following the redesignation of geographies in September 2022 to align with NISRA definitions. Sustainability was first identified in the 2019-21 AAP, published in June 2019.
60. St Anne's PS' approved admissions and enrolment numbers are 11 and 76 respectively and so also fall below the SSP minimum enrolment thresholds. Chart 1 below sets out the school's actual admissions and enrolments and shows that the school has not admitted to its approved enrolment number and enrolment has not exceeded more than 58 pupils (inclusive of SEN pupils) between 2018/19 and 2022/23, significantly below the minimum enrolment thresholds (either rural or urban) set out by the SSP.

² [Teacher workforce statistics in grant-aided schools in Northern Ireland, 2021/22 \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/teacher-workforce-statistics-in-grant-aided-schools-in-northern-ireland-2021/22) – Table 12

Chart 1 – St Anne’s PS Admissions and Enrolment Trends



Source: Annual School Census
Inclusive of SEN pupils

61. The table below sets out the enrolment at St Anne’s PS by year group. The data shown for 2022/23 illustrates that there has been an increase in pupil numbers in four of the seven year groups. However, the table also shows that 13 of the school’s pupils are currently in Y7 and will be transferring to post-primary in 2023/24 which will result in the school’s enrolment falling below 50 pupils unless admissions markedly increase. Admissions in 2021/22 and 2022/23 have fallen to XXX and five respectively (including children with Statements of SEN) and the school received five first preferences during the 23/34 process.

Table 5 – Enrolment by Year Group

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Y1	5	9	7	13	*	5
Y2	10	*	10	5	13	*
Y3	*	15	*	9	6	14
Y4	*	*	14	*	9	7
Y5	10	*	*	14	*	10
Y6	9	11	*	*	14	7
Y7	*	7	11	*	*	13

Source: DE Census Data
Inclusive of SEN pupils

62. Table 6 summarises the applications made to the school across each of the past four years and for 2022/23 and shows that the school has been consistently under-subscribed.

Table 6 – St Anne’s PS Preference Trends

Year	Approved Admissions	First preference applications	Total Applications (all preferences)	Total Applications Accepted*
2018/19	11	4	6	6
2019/20	11	*	*	*
2020/21	11	9	9	9
2021/22	11	*	*	*
2022/23	11	6	7	7
2023/24	11	5**		

*Excludes pupils with a statement of special educational needs

** Position at stage 1 of the 2023/24 admissions process

Criterion 3: Sound Financial Position

63. 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.
64. The school received a total delegated budget of £263,108 in the 2022/23 financial year for **50³** FTE pupils, which generates a per capita of £5,262. The average for all primary schools is £3,404.
65. The total Free School Meals Entitlement (FSME) for the school is **29³** pupils, which represents 58.00% of the total FTE, which places the school in Band 3 for funding purposes.
66. 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.
67. The CfC asserts that the school’s three-year financial plan 2021-24 indicates that it is living within its budget and will be in surplus at the end of 2023/24, the CfC further states that the school is on track to move out of deficit by the end of the current** financial year (the CfC asserts that ** At time of writing, 3/3/22, the school projected a 2021/22 end of year surplus of £15,000).
68. Evidence provided by the Principal of the school during the statutory objection period shows that the school is now projected to be in surplus for the current financial year, growing to a projected surplus of £48,853 for 2024/25 based on a total enrolment of 60 pupils.

³ 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).

Criterion 4: Strong Leadership and Management

69. The ETI inspection of September 2018 assessed the quality of leadership and management at St Anne's PS as "Very good". As previously noted, the associated ETI inspection report comments that *"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"*, and further comments *"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"*.

Criterion 5: Accessibility

70. The CfC states that the school is located in its own grounds on a *"busy commuter route for people travelling from the Ards Peninsula coastal towns to work in Bangor, Newtownards and Belfast"*, and further states *"the buildings of St Anne's are fit for purpose and are accessible for children with disabilities"*.
71. The CfC further asserts that the school provides annual Sacramental preparation classes for First Penance, First Holy Communion and Confirmation for pupils from Killard House Special School.

Criterion 6: Strong Links with the Community

72. The 2018 ETI inspection report notes *"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"*.
73. The CfC states that *"since 1932, St Anne's PS has been held in very high regard by, and is extremely active within, this close-knit community. As well as its strong relationships and collaboration with other local schools, St Anne's PS has always enjoyed strong community links"*. The CfC asserts that the school has been involved in town festivals, historical ceremonies, Christmas carol singing, environmental projects and intergenerational projects.
74. The CfC goes on to state that the school has enjoyed a close relationship with Ballyvester PS since the mid-1980s through various community relations initiatives and that the collaboration has deepened through engagement in the Shared Education Signature Project (SESP). The school also attend other local churches and invite ministers from all denominations to regularly present at school assemblies.

Summary of Sustainability Assessment

75. The 2018 ETI Inspection concluded that St Anne's PS has a *"high level of capacity for sustained self-improvement in the interest of all learners"* and noted excellent pastoral care. The school currently operates three composite classes, one of which comprises of three year groups contrary to SSP recommendations. The ETI commentary in respect of DP 683 (Appendix D) states that *"In 2020/21, the key stage 2 composite class spanned more than two-year groups with only one child 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."*
76. The school has not admitted to its approved admissions number in four of the past five years. Across the same period, the school's enrolment, inclusive of SEN pupils, has not exceeded more than 58 pupils, a figure below both the school's approved enrolment number and the SSP minimum enrolment threshold for a sustainable urban primary school. The number of expressions of interest in Transformation has not materially changed actual applications for admission to the school and does not provide strong evidence of a growth trajectory that will ultimately result in a sustainable school.
77. The school's **provisional** Surplus position as at 31 March 2022 is £12,523.
78. The 2018 ETI inspection of the school assessed the quality of leadership and management at the school as "very good". The CfC states that the school is accessible to its pupils and has enjoyed strong links with the community and other schools for many years.

Area Planning Context

79. The Transformation guidance states that any DP for Transformation must consider the wider context of the network of schools and *"Stakeholders should consider and develop proposals within this overarching framework. Schools should be able to demonstrate how they meet the six key indicators in the SSP. In approving Transformation to integrated status, an essential consideration for the Department is that the new integrated school will be viable and sustainable for the long term."* Details of alternative provision in the area is included in this submission.
80. There are two Integrated schools in the local area. Bangor Central IPS is situated over six miles (by road) away from St Anne's PS and Loughries IPS is situated over seven miles (by road). Map 2 shows that a small number of pupils travel to Bangor Central IPS from the Donaghadee area, while Loughries IPS and St Anne's PS both draw some pupils from the Millisle area.

81. The neighbouring controlled schools detailed in Table 1 all exceed the SSP minimum enrolment thresholds for their respective urban/rural designations. Should this proposal be approved, the risk to neighbouring controlled provision is considered to be low given the pattern of enrolments at these schools.
82. Table 1 also shows that there are three Catholic maintained schools all in excess of six miles (by road) away from St Anne's PS. All three schools exceed the minimum enrolment threshold for a sustainable urban primary school and any impact on these schools in the event of approval of this proposal is considered to be low. While approval of transformation would remove the only Catholic maintained primary provision in the Donaghadee area, options continue to be available for children to attend a Catholic maintained setting, albeit at a greater distance than currently experienced by most children currently attending St Anne's PS.
83. The school's current approved admissions and enrolment numbers are 11 and 76, as highlighted this is below the SSP minimum enrolment threshold. The CfC references the enrolment number and states that if 50% of pupils who have completed an Expression of Interest form enter the school for the next three years there would be an anticipated growth of 10 to 15 pupils per year, the CfC further provides a table (Table 15) detailing projected enrolment growth and shows that by 2030 the school hopes to admit 20 pupils per year and have an enrolment of 131. As previously stated, however, the number of expressions of interest in Transformation has not materially changed actual applications for admission to the school for 2023/24 and does not provide strong evidence of a growth trajectory that will ultimately result in a sustainable school.
84. It is important to clarify that should you decide to approve this proposal, the school's approved admissions and enrolment numbers would not change, the projected growth set out in the CfC would require a further, separate DP to increase approved numbers and an assessment of potential impact to the wider network of schools would be undertaken during consideration of that proposal.

Religious Balance

85. Table 7 below shows the historic religious balance at St Anne's PS and shows that the proportion of pupils from a Protestant background has been 20% or higher across four of the past five years, with a drop to 15.5% in 2022/23. It also shows that the proportion of pupils from a Catholic background has decreased across the past five years while the opposite is true for pupils identifying as other/no religion.

Table 7 - St Anne's PS – Religious Balance

	Protestant		Catholic		Other	
2018/19	10	20.00%	16	32.00%	24	48.00%
2019/20	13	26.50%	15	30.60%	21	42.90%
2020/21	11	22.50%	13	26.50%	25	51.00%
2021/22	10	20.00%	13	26.00%	27	54.00%
2022/23	9	15.50%	13	26.00%	36	62.10%

Source: Annual Census Return

86. Integrated schools aim to have a minimum of 30% of the school's enrolment from the minority tradition (Protestant or Roman Catholic), but this is an aspiration rather than a target or legal requirement. However, this can be difficult to achieve or demonstrate for individual schools depending on issues such as the demographics of the surrounding area and an increase in the number of pupils identifying as 'other' or 'religion not known'. Census data from 2011, although dated, shows that in the Donaghadee settlement, 6.39% of residents identified as belonging to or having been brought up in the Catholic religion and 82.84% identified as belonging to or having been brought up in the Protestant and other Christian religion. The designation "Other" is not otherwise expanded or explained.
87. Table 2 also shows the religious background of prospective pupils whose parents completed an Expression of Interest form. Based on the information gathered, it shows that future intakes have the potential to continue to draw Protestant pupils, but with a decline in the proportion of prospective pupils from a Catholic background, with none of the eight respondents with children due to start primary education in 2026/27 identifying the child as Catholic. This must be weighed against the reducing number of responses received for children due to enter primary school in later years and also the lower proportion of residents in Donaghadee from the Catholic tradition, but may indicate that the school may face difficulties in achieving a religious balance in the future.

Planning and Engagement in the Transformation Process

88. The guidance states that the Department will want to be satisfied about the school's commitment to integrated education and its commitment and potential to make a successful Transformation with the interests of pupils, rather than the institutions, being at the centre of any proposal. The guidance also highlights that the ultimate aim of the initial exploration phase is to develop a clearer understanding of the level of support for Transformation within the school community; and the type of changes that would be necessary within the school to transform successfully.

89. The AAP 2019-2021 (extended) was published on 17 June 2019 and identified the examination of sustainability of the school as an action to be progressed. The CfC asserts that initial discussions with IEF were then conducted in October 2019. Therefore, based on this chronology, it would appear that the exploration of transformation only commenced when the school was identified for potential closure by the managing authority. The CfC further asserts that the Principal of St Anne's PS visited two other integrated primary schools and disseminated his findings to staff in November 2021 with the Transformation Action Group being formed in December 2021.
90. The CfC also states that in addition to the groups it was required to consult with, consultation has been ongoing since September 2021 and has extended to involve the wider community. The CfC also provides a range of methods utilised by the school in order to identify and assess parental demand in the area.
91. During the statutory objection period, the school's Principal also provided copies of the school's Transformation Action Plan Year 1 evaluation showing the targets met and those which continue to be worked on, as well as the Year 2 plan which includes targets, timescales and resources the school hopes to utilise to achieve its targets.

Assessment Summary

92. The overall sustainability of St Anne's PS is a concern, particularly with regards to admissions and enrolment trends with the school falling below the SSP minimum enrolment threshold for a sustainable primary school in each of the last five years, this too has led to the implementation of composite classes comprising of more than two-year groups. The SSP highlights the difficulties which small schools can encounter and the detrimental impact on pupils' educational experience.
93. Representation from NICIE and the school's Principal has indicated that the enrolment at the school has increased and for 2022/23 the actual number of pupils enrolled is 58, while the Principal also asserts that 5 children have transferred to the school and cite the potential transformation of the school as their reason. Expressions of Interest forms gathered by the school also provide some indication of potential interest in provision of integrated education in the area. However, the Expressions of Interest are not supported by actual applications to the school and although parents of 45 children due to commence Y1 in 2022/23 indicated interest, the school only received seven applications in total, and five first preference applications at Stage 1 of the 2023/24 admissions process.
94. The impact of this proposal is considered to be low given that approved admissions and enrolment at the school will remain unchanged. All but one school shown in Table 1 exceeded SSP minimum enrolment thresholds in 2022/23. The proposal if approved could potentially impact enrolment numbers at Ballyvester PS which, with an enrolment of 109 (including SEN pupils) in 2022/23, may see its enrolment fall below the threshold for a sustainable rural primary school.

95. In overall terms, information set out in the CfC, in addition to supplementary evidence received during the statutory objection period, shows evidence of engagement with the community and commitment to the Transformation plan by parents, staff and governors at the school.

ASSESSMENT OF SPECIAL CONSIDERATIONS

Integrated Education

96. Section 4 of the Integrated Education Act (Northern Ireland) 2022 has amended Article 64 of the Education Reform (NI) Order 1989 in respect of the Department's statutory duty towards integrated education; the Article previously stated that the Department's statutory duty was to "*encourage and facilitate the development of integrated education*", this has now been amended to "*encourage, facilitate and support the development of integrated education*". Support is defined in Section 5 of the Act.
97. The duty does not equate to a duty to approve every proposal brought forward on behalf of an integrated school and the Department must also be mindful of its statutory duty under Article 44 of the Education and Libraries Order 1986 and under "Managing Public Money" to ensure effective and efficient use of public funds.
98. The Department must also be mindful of the ruling by Treacy J in the judicial review *McKee v Department of Education*, 2011. He said: "the Department may facilitate and encourage the Irish medium [and therefore also Integrated] sector in ways that it need not for other sectors by:
- taking positive steps; or
 - removing obstacles which inhibit the statutory objective."
99. The legislation and guidance for Transformation provide a mechanism for the Department to exercise its duty when a school meets the criteria set out in the guidance. The Department's assessment of St Anne's PS in the context of DP 683 highlights the balanced enrolment in terms of religion in recent years and continuing support from the local community. The related recommendations on DP 683 will take due account of the information and evidence gathered in this case together with the Department's 'duty' under Article 64.

The Integrated Education Act (Northern Ireland) 2022

100. This DP was published before the Act came into operation. The Department wished to provide opportunity to the school to put forward additional information, points or evidence that it would not have covered at the point of publication. In response to the Department's invitation to the school (and NICIE) to put forward any additional information or evidence considered relevant in the context of the Act, the Principal of St Anne's PS provided information in relation to religious balance, socio-economic deprivation measures, different abilities, ethos and practices etc which align mainly to Sections 1 and 2 of the Act as requested. This information, in full, can be found at Appendix F.

Newcomer Information Incorporating Those of Different Cultures

101. The summary table below shows a breakdown of newcomer pupils enrolled at St Anne's PS since 2002, their home language and the differing religions.

Table 8 – Breakdown of Newcomer Information

Home Language*	Religion*
Tagalog/Filipino	Orthodox Christian
Hindi	Muslim
Malayalam	None
Latvian	Roman Catholic
Italian	Methodist
Lithuanian	
Spanish	
German	
English	
Ukrainian	*In no particular order

Source: Additional information received by the Principal.

102. The table below shows that St Anne's PS has a history of enrolling newcomers to the school.

Table 9 – Historical Newcomer Enrolment

Year	Total Newcomers
2022/23 Provisional	7
2021/22	*
2020/21	*
2019/20	*
2018/19	*
2017/18	*

Source: DE Census Data

103. The information provided by the Principal also includes sample letters to parents which are translated into their home language; and photos from a variety of multi-cultural events held in recent years at the school, or in the local Community Centre. In addition, it is also asserted that there is signage around the school in relevant languages and collaboration with the EA Intercultural Education Service to provide translators.

Religious Split

104. In addition to Table 7, the Principal has provided an update on the 2022/23 Religious Split, as shown in the table below.

Table 10 – 2022/23 Religious Split

XXXX TABLE REDACTED XXXX

Source: Principal of St Anne's PS

Socio-Economic Deprivation Measures

105. Addressing the socio-economic deprivation measures required in the new Integrated Education Act, the Principal has provided commentary indicating that:-

- Parents are encouraged to check their eligibility for FSM and are supported in the completion of the FSM online application process;
- St Anne's PS do not ask parents for a "contribution" to school funds at any point during the year; all stationery supplies are provided free-of-charge;
- The uniform policy ensures that it is affordable to all; with only two "branded" pieces, all other pieces can be bought from any supplier including supermarkets;
- The school also run a uniform-recycling scheme, "Uni-Cycle", to help parents replenish outgrown pieces of uniform; and
- All of the After-School clubs are set at an affordable 50p per session, with some clubs such as Homework Club offered free-of-charge.

106. Extended Schools funding is targeted at those schools serving the most disadvantaged communities. To qualify for Extended Schools funding, schools must meet set criteria (which are indicators of socio-economic disadvantage) in order to ensure those in the greatest need receive additional support. Each year, DE determines which schools are eligible for the Extended School programme by identifying the most disadvantaged schools according to the proportion of their pupils which are entitled to FSM or live in an area classified as disadvantaged. This is worked out using FSM and pupil residence data gathered as part of the annual School Census exercise. In order to be eligible, a school must meet the following requirements⁴:

- 51% or more of their pupils living in either a Neighbourhood Renewal Area (NRA) or the 30% most deprived Super Output Areas (using both the MDM (2017) and Education Domain) and/or;
- 37% or more of pupils with FSME. In the case of Nursery schools, 37% or more of pupils with FSME or parents in receipt of Income Support or Income Based Job Seekers Allowance.

107. The Principal indicates that St Anne’s PS has qualified for Extended Schools funding for 15 years.

Table 11 – Historical Free School Meals Entitlement

	FSME	Enrolment	% FSME
2017/18	21	43	48.8%
2018/19	21	50	42.0%
2019/20	22	49	44.90%
2020/21	26	49	53.06%
2021/22	29	50	58.0%
2022/23* unvalidated	27	58	46.6%

Source: DE Annual Census Data

108. Table 11 illustrates that over a six-year period, the number of pupils entitled to FSM averages 24. The average total enrolment over the same period is 50 pupils, thus indicating approximately half of the school population have been entitled to FSMs.

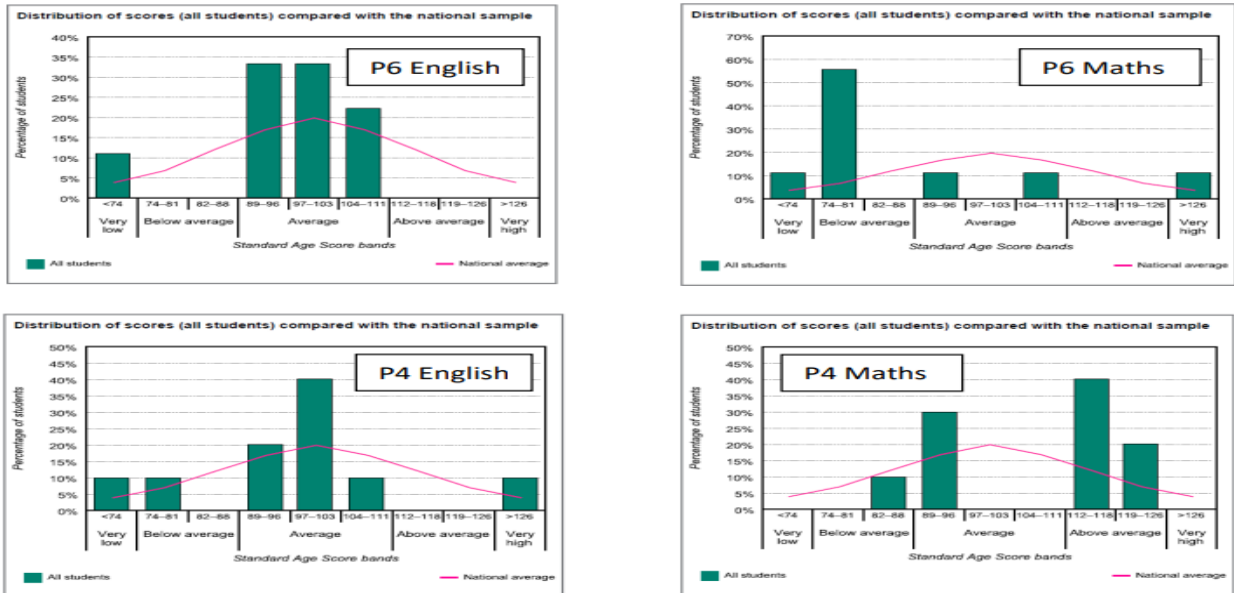
Different Abilities

109. The Principal has commented that St Anne’s PS has a programme of Special Needs support for those pupils who are identified as both low and under-performing. Their progress is carefully monitored and their support is continually assessed to ensure progression and development. The school supports children with physical needs by incorporating suitable activities into planning, making adjustments where necessary and by inviting visitors to school to share their experiences with the pupils.

⁴ [Extended schools criteria and funding 2018.19.pdf \(education-ni.gov.uk\)](#)

110. The visuals below show the differing range of abilities in St Anne’s PS using the standardised PtM/PtE tests.

Extracts from our 2022 Standardised Tests (PtE/PtM) which show a range of abilities:



111. It is considered by the Department that the information provided by the Principal may be viewed as relevant in the context of the provisions of the Act.

Shared Education Act

112. The Transformation CfC has acknowledged the successful Shared Education partnership that St Anne’s PS has enjoyed for over 35 years with its neighbouring controlled school, Ballyvester PS.

113. Governors have commented that this partnership has seen an increase in joint pupil, staff, parent and governor activity. They also stated that the transformation of the school would enable Shared Education to continue with more meaning in this area as they will be welcoming and expressing Protestant as well as Catholic and other identities as an integrated school.

114. The CfC further asserts that approval of this proposal will “increase the potential for building on the successful shared education partnership”. A number of responses received by the Department during the consultation period also highlighted the Shared Education partnership with Ballyvester PS and noted that approval of this proposal would allow this work to continue.

OTHER CONSIDERATIONS

Population Projections

115. The increasing size of the town of Donaghadee has been referenced in the CfC, by NICIE and by numerous respondents during the course of the statutory objection period, with particular reference given to new housing and expected new developments that have the potential to increase the population of the town.
116. Housing developments do not necessarily translate into reliable evidence of the need for school places, as matters such as age demographics of those who may move into a development and expressions of parental preference for types of education provision will have bearing on demand.
117. NISRA population projections for the Ards & North Down LGD indicate that the size of the cohort of primary school aged children will decrease gradually until 2043, as shown in Table 12 below.

Table 12 - NISRA Population Projections

Age/Year	2018	2019	2020	2021	2022	2023	2024	2030	2035	2040	2043
4	1869	1798	1889	1741	1634	1644	1658	1568	1517	1517	1542
4-11	15823	15671	15564	15355	15081	14759	14490	13285	12753	12456	12479

118. Although this data covers the population for the entire LGD, it is supplemented by analysis of live birth statistics for the Donaghadee ward and the three neighbouring wards, as set out in Table 13.

Table 13 - Live Birth Statistics

Ward/Year	2014	2015	2016	2017	2018	2019	2020
Donaghadee	37	37	29	29	29	26	24
Carrowdore	55	43	29	39	37	36	24
Loughries	56	35	45	39	51	33	45
Warren	40	26	35	32	54	42	49
Total	188	141	138	139	171	137	142

119. Analysis of live birth rates shows that the number of children born in each of the Donaghadee, Carrowdore and Loughries wards decreased between 2014 and 2020, with the number of children born in the Warren ward fluctuating; the total number of children born has decreased significantly over the seven-year period. Electoral wards can cover a large geographical area; the Warren ward extends into Bangor and the Loughries ward extends towards Newtownards, it may be the case that for a portion of children born in these wards that Loughries IPS or Bangor Central IPS would be closer than St Anne's PS.
120. The population projections cast further concern over the ability of St Anne's PS to grow in line with the projections given in the CfC and, therefore, the ability of the school to become sustainable in the long-term.

Resource

Capital

121. The CfC states that St Anne's PS is an established school and, therefore, there are no immediate financial costs associated with this proposal.

Accommodation

122. The CfC states that once pupil enrolment increases as projected, an additional modular classroom would be required by 2024/25. However, the figures provided indicate that at the beginning of 2024/25 the school project their enrolment to be 72 pupils, which is within their current approved numbers.

123. The CfC projects that in the period from 2027-2030, the school would have an enrolment of 131 pupils. If this is the case, then this would move the school into the five-classroom bracket and it would require an additional classroom and associated toilets. It is important to note once again, however, that this figure is in excess of the school's current approved enrolment number and a separate DP would need to be brought forward to increase this.

124. The cost of a single modular is currently in the region of £200k. This cost could increase considerably by 2027.

Staffing

125. The CfC asserts that the current staffing at St Anne's PS is a *“Teaching Principal, and three Assistant Teachers. The support staff team consists of a part time School Secretary, Caretaker, a Classroom Assistant and a Supervisory Assistant. There are also four Special Educational Needs Assistant.”*

126. The CfC further asserts that *“the school's current financial plan is to employ a fourth teacher in the school year commencing 2024. This will enable us to meet the Minister's priority with regard to composite classrooms and numbers of teachers.”*

CONCLUSION

127. The correspondence received in respect of DP 683 indicates a strong community response to the proposed Transformation of St Anne's PS to Controlled integrated status and the potential for parental demand for integrated education in the town. Conversely, some correspondence has signalled concerns of neighbouring provision should this proposal be approved.

128. The CfC presents a detailed proposal and demonstrates the steps that have been taken so far, and those that the school intends to take, to acquire controlled integrated status.

129. The most recent ETI inspection report (2018) concludes that the school “has a high level of capacity for sustained self-improvement in the interest of all learners” and assessed the quality of leadership and management as “very good”; the school had a provisional surplus in March 2021; the CfC provides evidence of strong links with the community and accessibility. As mentioned previously, the ETI have commented that “In 2020/21, the key stage 2 composite class spanned more than two-year groups with only one child 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.”
130. However, concerns remain regarding the sustainability of the school, both immediate and long-term. The school’s enrolment has not exceeded 58 pupils in the past five years, and while it has been asserted that five children have transferred from neighbouring primary schools, this figure remains significantly below the SSP minimum enrolment threshold. Expressions of Interest forms for children due to enter primary education in 2022/23 have not translated to actual applications to the school with 45 forms completed and only 7 applications received (six of which were first preference). At stage 1 of the 2023/24 admissions process, St Anne’s PS received five first preference applications.
131. The CfC projects growth to the school’s admissions and enrolment so that by the end of 2027 it will have an enrolment of 132 pupils (a projected growth of 128% over 4 years), but this trajectory has not been consistent with first preferences received for the 2023/24 year and is suggestive of an overly optimistic assessment of demand. Population projections and live birth rates indicate a declining cohort of primary school aged children in both the LGD and the immediate area around St Anne’s PS which provides further concern regarding the ability of the school to achieve a sustainable enrolment.
132. The Department has a duty under Article 64 to “encourage, facilitate and support the development of integrated education”, but must be convinced that the educational experience of pupils will be of high quality and be sustainable in the longer term.
133. In this case it is considered that, while the school has sought to demonstrate a pathway to sustainability through Transformation to controlled integrated status, the evidence is not suggestive of a successful outcome. The fact that there are two existing integrated primary schools within reasonable travel distance of St Anne’s PS, both of which have had available places in each of the past five years, indicates in broad terms that existing demand for integrated education in the area is currently being and can continue to be met. Considered alongside the projected decrease in the population of primary school aged children both locally and across the LGD, this suggests that the SSP minimum enrolment number (140) will not be reached within the timescales set out in the CfC.

SECTION 3: DEVELOPMENT PROPOSAL (DP) 673 - CLOSURE

Background

134. DP 673 has been progressed by CCMS in its capacity as managing authority of St Anne's PS under Article 14 of the Education and Libraries (Northern Ireland) Order 1986. The proposal was published on 20 January 2022 by the EA.
135. A copy of the published proposal and the supporting CfC are attached at Section 5, Appendices H and I respectively.
136. DP 673 proposes that *"St Anne's Primary School, Donaghadee will discontinue with effect from 31 August 2022, or as soon as possible thereafter"*.
137. The statutory objection period in respect of the proposal ran from the date of its publication until the 21 March 2022

Strategic Area Plans

138. The *'Providing Pathways' - Strategic Area Plan for School Provision 2017-20* and the (extended) *Annual Action Plan for School Provision April 2019 –March 2021* were published by the EA on 28 April 2017. The Area Plan notes that in the Ards & North Down LGD the population in the age range 0-15 years is projected to decrease by 2.3% between mid-2014 and mid-2024.
139. The AAP 2019-2021 (extended) was published on 17 June 2019 and identified the examination of St Anne's PS with the key issue identified as *"Address school provision where sustainability is an issue"* and associated action *"Managing authority to consult on options for future provision at St Anne's PS by May 2020"*. The CfC asserts that initial discussions with the IEF were conducted in October 2019. Therefore, based on this chronology, it would appear that the exploration of transformation only commenced when the school was identified for potential closure by the managing authority.
140. The SAP2 was published by the EA on 29 June 2022 and covers the years 2022 to 2027. SAP2 states *'The managing authorities and sectoral bodies in their statutory duty will seek to identify, explore and bring forward proposals to encourage and facilitate both Irish Medium and Integrated education to provide sustainable education for an area. Both Comhairle na Gaelscolaíochta and the Northern Ireland Council for Integrated Education will provide guidance on innovative sustainable provision, working with all education partners in achieving Area Planning solutions, including the option for individual schools to transform to integrated status.'*
141. The new SAP is supported by the OP1, there are no work streams relating to St Anne's PS in the plan.

Area Context

142. On the Northern Ireland Multiple Deprivation Measure 2017 the Donaghadee South 2 Super Output Area (in which St Anne's PS is situated) is placed 597 out of 890 (1 being most deprived and 890 least deprived).

Special Considerations

Shared Education Act

143. The Shared Education Act (Northern Ireland) 2016 confers a duty on the Department to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.
144. The Shared Education Act is underpinned by "Sharing Works – A Policy for Shared Education", which describes how shared education is expected to work in practice. Together, the Act and the policy provide a framework for the advancement of shared education.

CASE FOR CHANGE (CfC)

145. The CfC summarises that the rationale for the proposed discontinuance of 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*".
146. The CfC asserts that "*due consideration has been given to the balance between meeting the enrolment, educational and financial requirements of the SSP and removing provision. There is no evidence the enrolment, educational and financial aspects of the school can be satisfactorily addressed, should St Anne's PS remain as a Catholic maintained primary school*".
147. The CfC also highlights that pupils who live within two miles of the school do not qualify for transport assistance which restricts their ability to attend a sustainable school elsewhere.
148. The CfC confirms that equality screening of these proposals was carried out and the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate) have been considered.
149. Equality considerations relevant to this DP have been considered and alternative provision, including alternative maintained provision, is available should you approve closure of the school.

STATUTORY DEVELOPMENT PROPOSAL (DP) PROCESSES

Pre-Publication Consultation

150. The CfC asserts that pre-publication consultation commenced with St Anne's PS at meetings with the BoG, staff and parents/guardians on 27 February 2020, however, was halted due to the onset of the COVID-19 pandemic and subsequent standing down of all area planning activity. Consultation restarted on 3 June 2021 and ran until 2 July 2021, with all responses received during the initial consultation carried forward.
151. The EA invited comments from 42 schools which might be impacted by the proposals and received five responses, all of which did not support the proposal. Details of the pre-publication consultation are included in the CfC at Appendix J, a summary of the emerging themes is provided below:
- Donaghadee PS' approved enrolment will reduce from 466 to 420 from September 2022. As Ballyvester PS is full there will be limited capacity in the immediate area;
 - The distance to access a faith school is prohibitive;
 - Travel time to St Finian's PS or St Malachy's PS is likely to exceed 30 minutes;
 - There are projected to be in excess of 400 new houses in the next two to three years;
 - Catholic education in Donaghadee is being removed, this will disadvantage those seeking faith-based education for their children;
 - The closure of St Anne's PS leaves an enormous gap in Shared Education opportunities;
 - St Anne's PS is a feeder school to St Columbanus' College, any closure may have a negative effect on their enrolment;
 - Former Minister Peter Weir addressed the Assembly and 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"*.
 - It is unfair to measure a school against Area Planning criteria when we have been and continue to be significantly and adversely affected by the ongoing COVID-19 pandemic;
 - There remain smaller schools in other areas which do not have a local population for their intake.

Education Authority (EA) Comments

152. The EA supports CCMS in taking forward this DP; however, the EA has also expressed concern over the lack of suitable alternative provision in the area and state that it 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 (sic) to assist them in accessing suitable provision"*.

Two-month Statutory Objection Period

153. During the objection period, the Department received 51 objections to the proposal from a range of respondents, including parents, former pupils, BoGs of other schools and members of the community. The Department received no responses in support of the proposal. A summary of the representation received can be found at Appendix M, the emerging themes are listed below.

Emerging Themes Not in Support of the Proposal

- St Anne's provides a high quality of education as evidenced in the 2018 ETI report;
- The benefits of small class sizes and positive impact this has on children;
- The school has always welcomed children of all backgrounds and is reflective of the local community;
- Approval would remove parental choice for a faith-based primary education;
- Alternative Catholic Maintained primary schools are between 12 and 16 miles away and over-subscribed;
- The distance to other Catholic provision may disadvantage lower income families who may not be able to afford to transport their children;
- St Anne's PS' enrolment has increased from 29 in 2011 to 59 in 2022;
- The school has a positive, and improving, financial position;
- Population growth of Donaghadee and the volume of new properties recently built or due to be built will attract young families which will improve numbers at the school;
- Closure would have a negative impact on pupil's ability to gain access to St Columbanus' College as St Anne's PS is a feeder school;
- The school has been open for 92 years and would be a loss to the community;
- Closure would have a negative impact on children's wellbeing and mental health;
- St Anne's PS has a positive shared education relationship with Ballyvester PS;
- Children are currently able to enjoy a range of extra-curricular activities;
- The additional travel involved with transporting children will increase pollution.

Meeting with School Delegation

154. Andrew Muir MLA requested that the then Minister, Michelle McIlveen MLA, meet with a school delegation to discuss the future of the school. It is customary for requests of this nature, made during the statutory objection period, to be accepted and the Minister visited the school on 1 March 2022. Although the meeting was requested during the statutory objection period in respect of the proposal to discontinue St Anne's PS, the school delegation used the meeting to discuss and convey their case for Transformation (DP 683).

155. A record of the meeting is attached at Appendix N, the key points are largely reflective of those received by the Department during the statutory objection period in respect of DP 683.

Sustainability

156. The Department's SSP sets out six criteria which have quantitative and qualitative indicators and provide a framework for consideration of a school's longer-term sustainability. An assessment of St Anne's PS as measured against the SSP is provided below.

Criterion 1: Quality Education Experience

Education and Training Inspectorate (ETI) Assessment

157. A Primary Inspection of St Anne's PS was conducted by the ETI in September 2018, the associated report states that *"In order to promote improvement in the interest of all children, the inspection linked internal and external approaches to evaluate the: outcomes for children with a particular focus on literacy; quality of provision with a particular focus on literacy including across the curriculum and the reception provision; and quality of leadership and management"*, the report states that the school *"has a high level of capacity for sustained self-improvement in the interest of all learners"*.

Special Educational Needs (SEN)

158. In 2022/23, St Anne's PS has five pupils with a Statement of SEN. The 2018 ETI inspection report notes that *"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"*.

159. The CfC asserts that *"the school is recognised by parents and the community as being a supportive environment for those children with additional needs"*.

Composite Classes

160. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers. Statistics confirm that in 2022/23 St Anne's PS operated three composite classes: Years 1 and 2; Years 3 and 4; and Years 5 to 7. Figures for 2021/22 indicate that the school had 3.2 Full Time Equivalent (FTE) teachers⁵.

161. The 2018 ETI inspection report states that *"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"*.

⁵ [Teacher workforce statistics in grant-aided schools in Northern Ireland, 2021/22 \(nisra.gov.uk\)](https://www.nisra.gov.uk) – Table 12

162. ETI commentary in respect of DP 673 states that *“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”*.

Pastoral Care

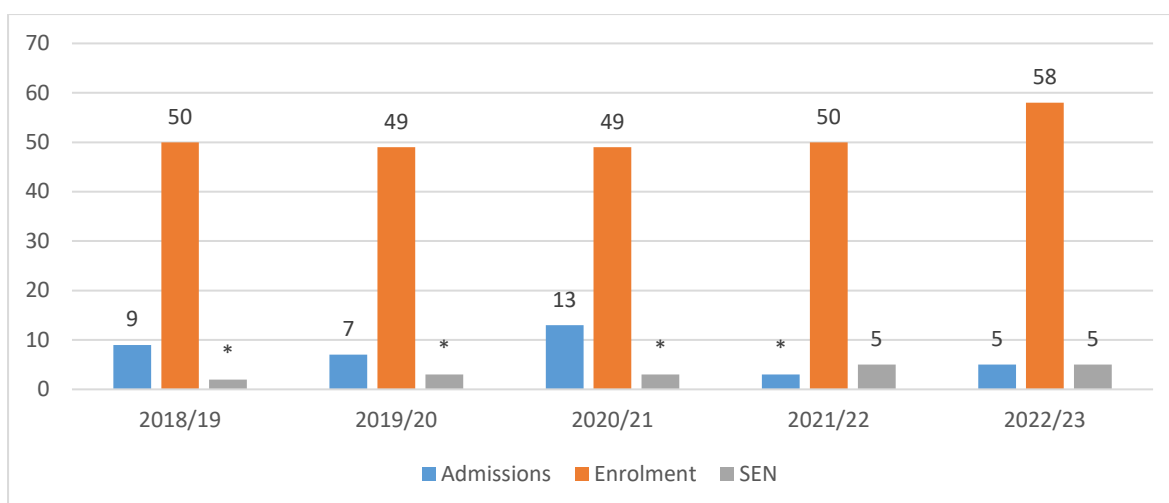
163. The 2018 ETI inspection report states *“that leadership and management promote a shared vision for high standards, excellent pastoral care and individualised support for every child within a caring and inclusive school environment”*.

Criterion 2: Stable Enrolment Trends

164. The SSP states that the minimum enrolment threshold for a sustainable rural primary school is 105 pupils and a sustainable urban primary school is 140. St Anne’s PS was previously defined by the SSP as “rural”; however, is now defined by the SSP as “urban” following the redesignation of geographies in September 2022 to align with NISRA definitions.

165. St Anne’s PS’ approved admissions and enrolment numbers are 11 and 76 respectively and so also fall below the SSP minimum enrolment thresholds. Chart 1 below sets out the school’s actual admissions and enrolments across each of the past five years and shows that the school has not admitted to its approved number and enrolment has not exceeded more than 58 pupils (inclusive of SEN pupils), significantly below the minimum enrolment thresholds set out by the SSP.

Chart 1 – St Anne’s PS Admissions and Enrolment Trends



Source: Annual School Census

166. Table 1 illustrates the applications made to the school across each of the past four years and for 2022/23, the table shows that the school has been consistently undersubscribed.

Table 1 – St Anne’s PS Preference Trends

Year	Approved Admissions	First preference applications	Total Applications (all preferences)	Total Applications accepted*
2018/19	11	*	6	6
2019/20	11	*	*	*
2020/21	11	9	9	9
2021/22	11	*	*	*
2022/23	11	6	7	7
2023/24	11	5**		

*Excludes pupils with a statement of special educational needs

** Position at stage 1 of the 2023/24 admissions process

Criterion 3: Sound Financial Position

167. 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.

168. The school received a total delegated budget of £263,108 in the 2022/23 financial year for **50⁶** FTE pupils, which generates a per capita of £5,262. The average for all primary schools is £3,404.

169. The total FSME for the school is **29⁶** pupils, which represents 58.00% of the total FTE, which places the school in Band 3 for funding purposes.

170. 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.

171. The CfC asserts that the school’s three-year financial plan 2021-24 indicates that the school is living within its budget and will be in surplus at the end of 2023/24, the CfC further states that the school is on track to move out of deficit by the end of the current financial year. 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.

⁶ The school’s funding allocation is based on the previous year’s census data (e.g. the October 2020 census data was used to determine the 2021-22 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).

Criterion 4: Strong Leadership and Management

172. The ETI inspection of September 2018 assessed the quality of leadership and management at St Anne's PS as "Very good". As previously noted, the associated ETI inspection report comments that *"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"*, and further comments *"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"*.

Criterion 5: Accessibility

173. The CfC states that the school is located in its own grounds on a *"busy commuter route for people travelling from the Ards Peninsula coastal towns to work in Bangor, Newtownards and Belfast"*, and further states *"the buildings of St Anne's are fit for purpose and are accessible for children with disabilities"*.

174. The CfC further asserts that the school provides annual Sacramental preparation classes for First Penance, First Holy Communion and Confirmation for pupils from Killard House Special School.

Criterion 6: Strong Links with the Community

175. The 2018 ETI inspection report notes *"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"*.

176. The CfC states that *"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"*.

177. The CfC goes on to state that *"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."*

Summary of Sustainability Assessment

178. The 2018 ETI Inspection concluded that St Anne's PS has a "high level of capacity for sustained self-improvement in the interest of all learners" and noted excellent pastoral care. The school currently operates three composite classes, one of which comprises of three year groups; in excess of the SSP recommendations. The ETI commentary in respect of DP 673 (Appendix L) states that "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".
179. The school has not admitted to its approved admissions number in four of the past five years. Across the same period, the school's enrolment, inclusive of SEN pupils, has not exceeded more than 58 pupils, a figure below both the school's approved enrolment number and the SSP minimum enrolment threshold for a sustainable urban primary school.
180. The school's **provisional** Surplus position as at 31 March 2022 is £12,523.
181. The 2018 ETI inspection of the school assessed the quality of leadership and management at the school as "very good". The CfC states that the school is accessible to its pupils and has enjoyed strong links with the community and other schools for many years.

Assessment of Special Considerations

Shared Education Act

182. The Department's statutory duty under the Shared Education Act is to encourage, facilitate and promote Shared Education. From an Area Planning perspective it is important to promote 'Shared Education' solutions that also consider the *sustainability* of the schools involved.
183. St Anne's PS is currently in a Shared Education Partnership with Ballyvester PS and approval of this DP would effectively end this sharing agreement. The CfC states that a Shared Education option was considered and notes that pupils engage in shared curricular/extra-curricular activities with Ballyvester PS, however, the CfC also asserts that these activities do not provide the basis for sustainable provision.
184. The Shared Education partnership was mentioned in a number of responses during the Department's consultation period, with a focus on the longstanding relationship between St Anne's PS and Ballyvester PS.

Other Considerations

Educational Impact

185. The CfC asserts that approval of this proposal would afford pupils the *“opportunity to enrol in a sustainable school 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”.*

186. The CfC further asserts that *“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. This proposal would progress the development of a network of strong viable schools to meet the educational needs of pupils”.*

187. Representation received by the Department during the two-month objection period highlighted the school’s excellent ETI inspection report, which has been assessed previously in this submission, while other responses assert that the small class sizes in operation at the school are beneficial to children.

Population and Housing Developments

188. Responses received during the Department’s two-month statutory objection period highlighted ongoing construction of housing developments in the Donaghadee area, asserting that there are currently 400 additional homes being built in the area with plans approved for further construction in the future. Respondents have asserted that the increased levels of housing will attract young families to the area and that this will result in increased demand for primary provision and subsequently improve enrolment figures at St Anne’s PS due to limited capacity at other primary schools in the area.

189. However, housing developments do not necessarily translate into reliable evidence of the need for school places, as matters such as age demographics of those who may move into a development and expressions of parental preference for types of education provision will have bearing on demand.

190. An increasing population in the town was also referenced by respondents during the Department’s consultation. NISRA population projections for the Ards & North Down LGD indicate that the size of the cohort of primary school aged children will decrease gradually until 2043, as shown in Table 2 below.

Table 2 - NISRA Population Projections – Ards & North Down LGD

Age/Year	2018	2019	2020	2021	2022	2023	2024	2030	2035	2040	2043
4	1869	1798	1889	1741	1634	1644	1658	1568	1517	1517	1542
4-11	15823	15671	15564	15355	15081	14759	14490	13285	12753	12456	12479

191. Although this data covers the population for the entire LGD, it is supplemented by analysis of live birth statistics for the Donaghadee ward and the three neighbouring wards, as set out in Table 3.

Table 3 - Live Birth Statistics

Ward/Year	2014	2015	2016	2017	2018	2019	2020
Donaghadee	37	37	29	29	29	26	24
Carrowdore	55	43	29	39	37	36	24
Loughries	56	35	45	39	51	33	45
Warren	40	26	35	32	54	42	49
Total	188	141	138	139	171	137	142

192. Analysis of live birth rates shows that the number of children born in each of the Donaghadee, Carrowdore and Loughries wards decreased between 2014 and 2020, with the number of children born in the Warren ward fluctuating; the total number of children born has decreased over the seven-year period. Electoral wards can cover a large geographical area; the Warren ward extends into Bangor and the Loughries ward extends towards Newtownards, it is therefore likely that for a portion of children born in these wards that alternative Catholic maintained provision at St Comgall's PS, St Malachy's PS or St Finian's PS would be closer than St Anne's PS.

193. The population projections set out above at both LGD and ward level suggest that the number of children entering primary school will reduce in the coming years. Population projections and live birth rates are not a perfect measure of future demand; however, the figures shown indicate that there would be significant challenges for St Anne's PS to meet either its approved numbers, or the minimum enrolment threshold for a sustainable urban primary school.

Resources

Finance

194. The CfC states that 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, as 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.

Accommodation

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

Staffing

196. The CfC asserts that the school's staff cohort is commensurate with the current and anticipated enrolment and any redeployment/redundancy costs will be in line with current guidelines. However, it is not possible to predict the number of redundancies or redeployments in advance of a decision regarding the DP. 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.

Transport

197. The CfC asserts that the majority of the pupils attending St Anne's PS live within a three-mile radius of the school with a small number of pupils living beyond a five-mile radius. The discontinuance of St Anne's PS would require the provision of home-to-school transport for certain pupils; however, given the numbers involved, it would be anticipated the financial implications for the Transport budget or Food in Schools budget would not be significant. Any transport arrangements will be in accordance with transport regulations and identified preference school.

Efficient use of Resources

198. In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of resources available to it.

199. In respect of St Anne's PS, in 2022/23 the school had 58 pupils enrolled. It receives the maximum Small School Support funding (£51,863). The delegated budget generates a per capita allocation of £5,262 which is significantly above the Northern Ireland average for all primary schools (£3,404).

200. Any consideration of the continuance of St Anne's PS must be balanced against the need to avoid unreasonable public expenditure and to provide high quality education. As set out in this submission, the school's enrolment has not exceeded 58 pupils in the last 5 years (2018/19 to 2022/23) and there is no clear evidence that maintaining the school in its current form would result in an improved enrolment which provides cause for concern regarding the school's long-term viability.

Conclusion

201. The CfC presented by CCMS in respect of this proposal asserts that all viable options were considered for the future of St Anne's PS with the only option that would result in pupils having the opportunity of attending a sustainable primary school being that of discontinuance.
202. All proposals must have at their core the best interest of pupils. In this instance, there is no strong evidence that the continuation of St Anne's PS as a Catholic maintained primary school would result in the delivery of sustainable provision for pupils of the school. Evidence set out in this submission shows that the school has been significantly below the SSP minimum enrolment threshold for a sustainable primary school (both urban and rural) in each of the past five years, with no clear indication that this position will improve in the future. Falling enrolments can provide challenges for a school to overcome in order to provide a high-quality educational experience for its pupils.
203. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite years groups in a single classroom and a minimum of four teachers. Evidence shows that in 2022/23, St Anne's PS operated three composite classes, one of which consisted of three years groups (Y4-7) and in 2021/22 employed less than four FTE teachers.
204. Inspection evidence shows that within a composite class of two-year groups, it is possible for all children to be catered for effectively and make good progress. There is no evidence from school inspections to suggest that children taught in composite classes of two-year groups are disadvantaged in any way. However, additional factors need to be considered when the composite class spans more than two-year groups. Under these circumstances, ensuring adequate progression in learning and planning to meet the individual needs of children across a wider ability range and stage of development can be more challenging for the teacher. There are also issues relating to opportunities for the children to develop socially and emotionally with children of a similar age, gender and stage of development.
205. The CfC notes that there are available places in local schools and evidence set out in this submission shows that there are sufficient available places in neighbouring Catholic maintained schools to cater for all pupils currently enrolled in St Anne's PS as well as available places at local controlled schools. It is acknowledged that the closest available Catholic maintained provision with available places is St Malachy's PS, located 6.9 miles (by road) from St Anne's PS; however, should this proposal be approved transport would be provided to pupils who are entitled to it.

SECTION 4: ASSESSMENT OF IMPACT/OPTIONS

Options

207. There are two options to consider in this case, namely:

- **Option 1:** DP 683 – *approve* the school’s ‘transformation’. As education provision at the St Anne’s PS setting would continue, albeit as a different management type, then your decision on DP 673 (discontinuance) is limited to non-approval to facilitate the approval of DP 683 for transformation.
- **Option 2:** DP 683 – *do not approve* the school’s ‘transformation’. This would result in options for your decision in respect of DP 673 (discontinuance) for either approval/non-approval which would determine whether or not St Anne’s PS closes or remains open under its current management type.

Risks and Benefits

Risks

208. Should you decide to approve DP 683 (transformation), there is no guarantee that the Expressions of Interest gathered in support of this proposal will translate to actual applications and create a sustainable school. Indeed, provisional data for 2023/24 admissions show that projections set out in the CfC have been significantly over-optimistic. This will have an impact to the educational experience of pupils and will also represent a continued additional cost to the education budget.
209. Should you decide to either approve DP 683 and the school transforms or decide not to approve DP 683 and approve DP 673 which would see education provision at the St Anne’s PS site discontinue, in each scenario local Catholic Maintained provision will be removed. Although there are available places at alternative Catholic maintained schools in both Newtownards and Bangor, this would result in further travel distance for pupils; however, this is expected to be within the home-to-school transport time threshold for primary pupils and transport would be provided to those pupils who are eligible.
210. Should the Transformation be turned down and education provision cease on the St Anne’s site, a future proposal for a new Grant Maintained Integrated (GMI) school in this area could be brought forward (and be successful) if viability is demonstrated through a minimum intake of 12 Year 1 pupils to secure recurrent funding and a minimum of 15 Year 1 pupils per year (over three years) to secure capital funding.

Benefits

211. Approval of DP 683 would see the transformation of St Anne’s PS to a controlled integrated primary school. The retention of education provision at the St Anne’s PS site could be seen as a positive response to potential interest in establishing integrated education in the area.

212. St Anne's PS is an established school, with suitable accommodation for an enrolment of 76 pupils, but should you decide to approve the DP for transformation and there is a subsequent shift in parental preference to the school, additional accommodation can be provided.

Supporting Contextual Issues

213. There are a number of supporting contextual issues which also have to be factored into your consideration of your proposals. These are:

New Decade New Approach Deal (NDNA)

214. The priorities of the (restored) NI Executive are set out in the New Decade New Approach Deal (NDNA - 2020). For Education, which is included under the Transformation of Public Services banner, it states that a priority is:- *'To help build a shared and integrated society, the Executive will support educating children and young people from different backgrounds together in the classroom'*.

Programme for Government (PfG)

215. The draft Programme for Government (PfG) Outcomes Framework (2021) under the Our Children and Young People have the best start in Life' outcome includes as one of its key priority areas: *'Addressing resourcing pressures, taking a strategic approach to area planning i.e. ensuring all have access to fit for purpose schools and support our education sector, including integrated and shared education'*.

Access to Education

216. Area Planning aims to ensure that all pupils have access to a network of sustainable schools of the right type and size; in the right place and which have a focus on raising standards through a broad and balanced curriculum offer.

Education Reform (Northern Ireland) Order 1989 – Article 64

217. There is a statutory duty on the Department of Education under Article 64 of the Education Reform (NI) Order 1989 (as amended by the Integrated Education Act (NI) 2022) *'to encourage, facilitate and support the development of integrated education.'*

Overall Conclusion

218. The historic low enrolment at St Anne's PS is a key concern to the sustainability of education provision at the school. However, the Department must also be cognisant of its statutory duty to encourage, facilitate and support the development of integrated education which extends to supporting schools that wish to, and show potential, to transform to integrated status by demonstrating that they can become viable and sustainable as measured against the Department's transformation guidance.

219. The assessment of DP 683 for St Anne's PS against the Transformation guidance and criteria highlights that the school has made efforts and garnered community support for the proposal to transform; however, also highlights that enrolment numbers continue to fall significantly below the SSP minimum enrolment threshold for a sustainable primary school.
220. Data for 2022/23 shows that in spite of the threat of closure at the school, the overall enrolment has improved, increasing from 50 pupils in 2021/22 to 58 pupils. However, despite a large number of completed Expression of Interest forms, these have not translated directly into applications for admission to the school, with six first preference applications for 2022/23 and only five pupils admitted. There are 13 pupils in Y7 at the school expected to transfer to post-primary in 2023/24, which will see the total enrolment reduce below 50 if admissions continue to be low. Stage 1 of the 2023/24 admissions process shows that St Anne's PS received five first preference applications.
221. There has historically been a degree of balance in terms of religion at the school, with Protestant and Roman Catholic pupils accounting for 15.5% and 26% of the enrolment respectively in 2022/23 and the remaining 62.1% identifying as "other/no religion".
222. Population projections for the Ards and North Down LGD, along with live birth statistics for the Donaghadee ward and its three neighbouring wards, suggest that the population of primary aged pupils in the area will decrease in the coming years. This will present additional challenges for the school, in any format, to improve its admissions and enrolment to a sustainable number.
223. Housing development within Donaghadee has been referenced in the CfC by NICIE and by responses received during the statutory objection period; however, there remains no clear indication that the population of primary aged pupils will increase.
224. It is also acknowledged that the Department has a statutory duty to encourage, facilitate and support the development of integrated education; however, the Department must also be convinced that this will be to the benefit of the educational experience of all pupils which can only be met through the delivery of sustainable, viable provision.
225. Overall, there remain considerable concerns regarding the ability of St Anne's PS to meet the sustainability criteria and it is recommended that you do not approve DP 683 (transformation) and approve DP 673 (discontinuance) of St Anne's PS.
226. As the implementation date initially proposed for DP 673 has now passed, should you decide to approve the proposal it will require an approval with modification (to the implementation date) to 1 September 2023, or as soon as possible thereafter.
227. The sheet below should be completed to record your decisions on DP 683 and DP 673.

DECISION PAGE

In accordance with Article 94 (4) of the Education Reform (NI) Order 1989 I have read and considered the submission presented to me in relation to:

- **DP 683** which proposes St Anne's PS's Transformation to Controlled Integrated status; and
- **DP 673** which proposes the discontinuance of St Anne's PS

As required by the legislation, I have taken my decision on DP 683 (*Transformation*) in advance of my decision on DP 673 (*Discontinue*).

DP 683: *St Anne's Primary School will transform to Controlled Integrated Status, with effect from 1 September 2023, or as soon as possible thereafter.*

Decision:

Having read all of the information, evidence and letters of support and objection provided to me in the submission from officials, I have carefully considered these Development Proposals in respect of St Anne's PS and I would make the following comments:

In the absence of a Minister for the Department, The Northern Ireland (Executive Formation etc) Act 2022 enables me to make a decision with regard to these development proposals and I am satisfied that it is in the public interest to do so.

The Department must be cognisant of its statutory duty to encourage, facilitate and support the development of integrated education, which extends to supporting schools that wish to transform to integrated status by demonstrating that they can become viable and sustainable as measured against the Department's transformation guidance. The Department must be convinced that this will be to the benefit of the educational experience of all pupils which can only be achieved through the delivery of sustainable and viable provision. In this context, the historic low enrolment at St Anne's PS is a key concern in relation to the long term sustainability of education provision at the school.

The assessment of DP 683 for St Anne's PS against the Transformation guidance (Integration Works) and underpinning criteria highlights that the school has made efforts and garnered community support for the proposal to transform; however, it also highlights that enrolment numbers continue to fall significantly below the SSP minimum enrolment threshold for a sustainable primary school. The projected enrolments put forward in the case for change do not demonstrate that the school can reach sustainable enrolment thresholds.

While the school has sought Transformation to controlled integrated status, the evidence is not suggestive of a successful outcome. In addition, there are two existing integrated primary schools within reasonable travel distance of St Anne's PS, both of which have had available places in each of the past five years. This indicates in broad terms, that existing demand for integrated education in the area is currently being and can continue to be met.

Overall, the evidence presented to me demonstrates that there remain considerable concerns regarding the ability of St Anne's PS to meet the sustainability criteria and, based on the evidence in the submission and having read all of the submission and associated appendices and taking all of these matters into account, I have decided to not approve the transformation to Controlled Integrated status.

DP 673: *St Anne's Primary School will discontinue with effect from 31 August 2023, or as soon as possible thereafter*'.

Decision:

The historic low enrolment at St Anne's PS is a key concern in relation to the sustainability of education provision at the school. There is no compelling evidence that the continuation of St Anne's PS would result in the delivery of sustainable provision for pupils of the school. Evidence set out in the submission shows that the school has been significantly below the SSP minimum enrolment threshold for a sustainable primary school (both urban and rural) in each of the past five years, with no indication that this position will improve in the future. Falling enrolments provide challenges for a school to overcome in order to provide a high-quality educational experience for its pupils.

The overall enrolment at the school improved in 2022/23, in spite of the threat of closure, slightly increasing from 50 pupils in 2021/22 to 58 pupils in 2022/23. However, at the conclusion of the 2023/24 admissions process, St Anne's PS received and accepted only five first preference applications. There are 13 pupils in Y7 at the school expected to transfer to post-primary in 2023/24 which will see the total enrolment reduce to below 50.

Having read all of the submission and associated appendices and taking all of these matters into account, I have taken the decision to approve the proposal to discontinue the school.

In approving the discontinuance of St Anne's PS I am aware that local Catholic Maintained provision will be removed. However, the evidence shows that there are available places at alternative Catholic maintained schools in both Newtownards and Bangor, and transport would be provided to those pupils who are eligible.

The discontinuance of St Anne's PS would require the provision of home-to-school transport for certain pupils; however, given the numbers involved, it would be anticipated that the financial implications for the Transport budget would not be significant. Any transport arrangements will be in accordance with transport regulations and identified preference school.

In implementing my decision, the Council for Catholic Maintained Schools, as Managing Authority, must ensure the needs of children and parents (including those who have a Statement of Special Educational Need) are addressed through closure/transfer arrangements.

MARK BROWNE (Dr)
PERMANENT SECRETARY OF THE DEPARTMENT OF EDUCATION