



Appendix 1

CONSULTATION REPORT REGARDING THE CLOSURE OF INVERAVON PRIMARY SCHOOL

April 2023

**This Consultation Report has been issued by Moray Council in
accordance with the Schools (Consultation) (Scotland) Act
2010 (as amended)**

**If you have difficulty reading this document please contact
Learning Estates Team on 01343 563374**

Contents

1. Introduction
2. The Consultation Process
3. The Proposal
4. Educational Benefits Statement
5. Public Engagement
6. Written Responses
7. Moray Council Response to Written and Oral Representations
8. Education Scotland Report
9. Alleged Omissions or Inaccuracies and Additional Information
10. Compliance with Section 9(1) of the Schools (Consultation) (Scotland) Act 2010
11. Compliance with Sections 11A to 13 of the Schools (Consultation) (Scotland) Act 2010
12. Representations to Scottish Ministers in terms of Section 15 of the Schools (Consultation) (Scotland) Act 2010
13. Conclusion
14. Recommendation

Appendices:

Appendix A	Closure of Inveravon Primary School Consultation Document
Appendix A1	Options Appraisal
Appendix A2	Public Engagement Comments/Suggestions
Appendix A3	Financial Template
Appendix B	In person Public Meeting Record – Inveravon Church (27 September 2022)
Appendix C	In person Public Meeting Record – Speyside High School (27 September 2022)
Appendix D	Virtual Public Meeting Record (28 September 2022)
Appendix E	Parental Feedback
Appendix F	Pupil Engagement

Appendix G	Online Survey Responses
Appendix H	Online Survey Summary Report
Appendix I	Education Scotland Report

1. Introduction

- 1.1 This report has been prepared following a consultation on the proposal to discontinue education at Inveravon School, which is currently mothballed, and reassign its catchment area to that of either Knockando, Glenlivet or Aberlour primary schools or a combination of these.
- 1.2 This report has been prepared in accordance with the Schools (Consultation) (Scotland) Act 2010 on the above proposal. The objective of this report is to:
- Provide a record of the total number and a summary of written and oral responses received during the statutory consultation period;
 - Provide a statement of the Council's response to those written and oral representations;
 - Provide the full text of Education Scotland's report and a statement of the Council's response to this report;
 - Provide a statement on how the Council reviewed the above proposal following the representations received during the statutory consultation period;
 - Provide details of any omission from, or inaccuracy in, the proposal document and state how the Council acted on it;
 - State how the Council has obeyed Section 12 of the Schools (Consultation) (Scotland) Act 2010 when reviewing the above proposals; and
 - Provide officer conclusions and recommendation.

2. The Consultation Process

- 2.1 The requirement for consulting on a relevant proposal relating to schools is set out in the Schools (Consultation) (Scotland) Act 2010.
- 2.2 At its meeting on 24 August 2022 the Education, Children's and Leisure Services Committee authorised a statutory consultation regarding the closure of Inveravon Primary School.
- 2.3 The proposal document made clear to consultees that the consultation period would run from 29 August 2022 until 7 October 2022. This more than adequately covered the required minimum of 30 days term time required for consultation.
- 2.4 On 29 August 2022 copies of the proposal document were made available to:
- Parent Councils of Knockando, Aberlour and Glenlivet Primary Schools;
 - Parents of the pupils at Knockando, Aberlour and Glenlivet Primary Schools;

- Pupils at Knockando, Aberlour and Glenlivet Primary Schools;
- Parents of pre-school age children living within the Inveravon catchment;
- Staff at Knockando, Aberlour and Glenlivet Primary Schools;
- Trade union representatives;
- Speyside Community Council;
- Glenlivet and Inveravon Community Association;
- Tomintoul and Glenlivet Development Trust;
- Education Scotland; and
- Inveravon Primary School catchment residents

2.5 A copy of the document was also made available at:

- Aberlour Library;
- Knockando Primary School;
- Aberlour Primary School;
- Glenlivet Primary School;
- Glenlivet Medical Practice;
- Ballindalloch Post Office;
- Community Centre, Speyside High School; and
- Elgin Library

2.6 A copy of the document was also available on request from Moray Council Learning Estates Team.

2.7 The proposal document was also published on the Council website:
http://www.moray.gov.uk/moray_standard/page_139703.html

2.8 Communication regarding the consultation was published on the Council's newsroom and social media platforms on 24 August 2022 when a news release was issued. It was further promoted on social media platforms on 8 September 2022.

2.9 The consultation was also advertised in the Press & Journal and Northern Scot newspapers on 9 September 2022.

2.10 An online survey was available throughout the consultation period.

2.11 The consultees were also given the option to submit their comments on the proposal via email to LearningEstate@moray.gov.uk or posted to Community Support Officer (Learning Estate), Elgin Council Offices, High Street Elgin IV30 1BX

2.12 Two face-to-face public meetings were held during the consultation period. The first was held at 1:30pm on Tuesday 27 September 2022 at Inveravon Church, Ballindalloch AB37 9BA. A further public meeting was held at 7pm on Tuesday 27 September at Speyside High School, Mary Avenue, Aberlour AB38 9QU.

- 2.13 An online public meeting was held on Wednesday 28 September. Anyone wishing to attend this meeting was able to register their interest by emailing learningestate@moray.gov.uk.
- 2.14 Education Scotland received a copy of the proposal document and attended both public meetings.
- 2.15 At the end of the consultation period, Education Scotland were provided with all documentation relating to the consultation. They also visited Inveravon Primary School, Knockando Primary School and Speyside High School, which included discussions with parents and pupils. Following their visit and a review of relevant documentation, Education Scotland issued a report on the educational aspects of the proposal. The report is covered in more detail within Section 8 of this report.
- 2.16 Adhering to the statutory requirement this consultation report was published on the Moray Council's website on 12 April 2023, in preparation for the Education, Children and Leisure Services Committee on 19 April 2023, and more than three weeks, the minimum time required, prior to when the Council is expected to take the decision on whether to implement the proposal

3. The Proposal

- 3.1 The proposal document, included as **Appendix A** to this report, was issued to those individuals and bodies listed under 'Distribution' within the proposal document. The Proposal Document was also published on the Council website at:
http://www.moray.gov.uk/moray_standard/page_98109.html#Closure%20of%20Inveravon%20Primary%20School
- 3.2 The proposal on which the consultation took place was:
- To close Inveravon Primary School, currently mothballed, and re-assign its catchment area to either Knockando Primary School, a combination of the Knockando and Aberlour primary schools or a combination of Knockando, Aberlour and Glenlivet primary schools.***
- 3.3 The schools that could be impacted by this proposal are;
- Inveravon Primary School
 - Knockando Primary School
 - Aberlour Primary School
 - Glenlivet Primary School
- 3.4 The proposal was advanced for the following reasons:
- At the start of the 2016/17 session the Inveravon Primary School roll was 13 pupils;

- During the build up to the closing months of the 2016/17 session the school roll had declined, leading to no children enrolled for the 2017/18 session at the end of June 2017;
- It was noted that a number of children within catchment were electing to move to Knockando Primary School;
- In August 2017, due to no children attending the school for the start of the new 2017/18 session, the Education Service was left with no alternative but to take the decision to not open the school and in September 2017, the school was mothballed;
- No parents had chosen to enrol their children at Inveravon Primary School for the 2017/18, 2018/19, 2019/20, 2020/21, 2021/22 or 2022/23 sessions; and,
- Although the number of primary school children in the Inveravon Primary School catchment totalled 15 for the 2022/23 session those families who have formally indicated their choice did not wish to send their children to Inveravon Primary School as they have settled elsewhere.

3.5 An update report on the position at Inveravon School was given to the Education, Children and Leisure Services Committee on 24th November 2021. The Committee agreed to the preparation of an options appraisal regarding the future of Inveravon Primary School.

3.6 A follow up report was submitted to the Education, Children and Leisure Services Committee on 24th August 2022 seeking approval to undertake a statutory consultation on the closure of Inveravon Primary School in accordance with the Schools (Consultation) (Scotland) Act 2010.

3.7 The Education, Children's and Leisure Services Committee agreed to :

- (i) Authorise a statutory consultation with local stakeholders (Parent Councils, parents, pupils, staff and the local community) on the proposal to close Inveravon Primary School; and,
- (ii) To receive a further report on the outcome of the consultation in January 2023.

Due to insufficient time and resource the Moray Learning Estate team were unable to complete the consultation analysis and draft the Consultation Report for December 2022 to support Committee meeting in January 2023.

4. Educational Benefits Statement

4.1 In 2009, the Scottish Government set out its Vision for the Future School Estate in Scotland, in 'Building Better Schools: Investing in Scotland's Future'.

4.2 In September 2019, this was updated with Scotland's Learning Estate Strategy 'Connecting People, Places and Learning', which was developed by Scottish Government and COSLA. This contains ten guiding principles. Local Authorities are required to take account of these principles in planning changes to their school estate, namely:

- Learning environments should support and facilitate excellent joined up learning and teaching to meet the needs of all learners;
- Learning environments should support the wellbeing of all learners, meet varying needs to support inclusion and support transition for all learners;
- The learning estate should be well-managed and maintained, making the best of existing resources, maximising occupancy and representing and delivering best value;
- The condition and suitability of learning environments should support and enhance their function;
- Learning environments should serve the wider community and where appropriate be integrated with the delivery of other public services in line with the place principle;
- Learning environments should be greener, more sustainable, allow safe and accessible routes for walking, cycling and wheeling and be digitally enabled;
- Outdoor learning and the use of outdoor learning environments should be maximised;
- Good consultation about learning environments, direct engagement with learners and communities about their needs and experiences, and an involvement in decision making processes should lead to better outcomes for all;
- Collaboration across the learning estate, and collaboration with partners in localities, should support maximising its full potential;
- Investment in Scotland's learning estate should contribute towards improving learning outcomes and support sustainable and inclusive economic growth.

4.3 In May 2016, Moray Council approved the 'Schools for the Future': A policy for Sustainable Schools' in order to monitor schools provision in Moray and ensure provision continues to meet the needs of learners, parents and the community and enable the Council to meet its requirements to ensure best value, as per the Local Government Scotland Act 2003. This policy contributes to the aim of ensuring all children and young people in Moray have equality of opportunity in terms of access to educational provision and facilities.

4.4 Within this policy, Moray Council set criteria and indicators in determining an optimum quality education experience which include provision of accommodation as reported to Children and Young People's Services Committee for:

- The range of curricular and wider school activities available for children to enable them to achieve in a range of activities for personal and wider achievement (e.g. physical education, music, art, drama);
- The ability of the school to cater for children with Additional Support Needs;
- The school's ability to provide access to a suitably broad and balanced curriculum;
- The quality of the physical environment for learning and teaching
 - Condition - minimum standard B
 - Suitability - minimum standard B
- No more than two composite year groups in a single classroom at primary school level.

- A minimum of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers; and.
 - Ideally, at least seven classrooms (one for each year group).
- 4.5 Key statutory requirements are further subsumed including delivery of 2 hours minimum Physical Education as part of National standards, compliance with statutory legislation in relation to school accommodation and Additional Support Needs, UNCRC and overall extent of on-site accommodation and facilities (including required general purpose spaces, play and social spaces, staff rest areas and outdoor spaces).
- 4.6 Moray's vision and strategic direction for all involved in Moray Education as set out in our Education Strategic Plan and Priorities 2020-2023 – *improving outcomes for all Moray's children and young people* – is underpinned by the core entitlements of Curriculum for Excellence in order to ensure all children and young people maximise development in the four capacities: Successful Learners, Confident Individuals, Effective Contributors and Responsible Citizens. This stems from Early Learning and Childcare, across the Broad General Education and through into the Senior Phase, working across our system to ensure our learners progress to positive and sustained post-school destinations. Underpinned by our Council values of Fair, Ambitious, Improving and Responsive *we are ambitious to achieve excellence together* in benefit of all Moray's children and young people.
- 4.7 In order to deliver on our Education strategic vision and priorities, all Moray schools thus work towards:
- *Improving outcomes for all:* help improve levels of children and young people's achievements and broaden the range of opportunities for young people to develop their skills;
 - *Curriculum:* provide a quality curriculum and create positive environments for effective learning and teaching matched to the needs of learners;
 - *Learning, teaching and assessment:* create the conditions for greater personalisation and choice for children and young people with improved continuity and progression in their learning; create more opportunities for children and young people to participate in well-judged paired and group activities;
 - *Supporting all learners:* develop a supportive ethos where children and young people's learning, personal, social, health and emotional needs address the care and welfare of children and young people and their personal and social development.
 - *Leadership at all levels:* strong, sustainable schools providing quality education and access to the full curriculum are central to the achievement of this vision and delivering these entitlements.
- 4.8 As further educational context, *Curriculum for Excellence* guides us to achieve transformation in education in Scotland by providing a coherent, more flexible and enriched curriculum from 3 to 18 firmly focused on the needs of the child and young person and designed to enable them to become successful learners, confident individuals, responsible citizens and effective contributors. All children and young people are entitled to experience:

- a coherent curriculum from 3 to 18;
- a broad general education, including well planned experiences and outcomes across all the curriculum areas. This should include understanding of the world and Scotland's place in it and understanding of the environment;
- a senior phase which provides opportunities for study for qualifications and other planned opportunities for developing the four capacities;
- opportunities for developing skills for learning, skills for life and skills for work;
- opportunities to achieve to the highest levels they can through appropriate personal support and challenge; and,
- opportunities to move into positive and sustained destinations beyond school;

4.9 Educational benefits are considered below for pupils in respect of options previously outlined in this proposal document.

4.10 In December 2020, Moray Council approved the approach to the Moray Learning Estate Strategy, setting out the vision of providing a sustainable education service aiming for excellence. As well as improving condition and suitability as noted in para 4.4 above, among wider outcomes this strategy aims to ensure our learning estate enriches the learner journey and supports curricular delivery noting the quality of learning environment as having direct impact on learning and achievement of children and young people.

4.11 Ensuring all young people develop in the four Curriculum for Excellence capacities through the learner entitlements in para 4.8 above would prove more challenging if Inveravon Primary School were to reopen with a reduced number of pupils across the Primary age range. This would also place discrete pressures on staff, for example in planning for a wide range of needs, year groups and abilities, in developing the curriculum and managing educational change. As a result, multi-stage composite classes can prove challenging to recruit teachers compared with larger schools where classes have single or few stage composite arrangements.

4.12 Pupils attending schools within the Speyside Associated Schools Group in closest proximity to Inveravon Primary School; Aberlour, Glenlivet and Knockando Primary Schools, regularly work in pairs and groups on shared learning tasks and cooperative learning activities. A school size low in pupil numbers, for example in a school of 5 or fewer children based on potential future intake if Inveravon Primary School re-opened would mean that groups would be curtailed in size restricting activities to those of a paired nature, with little to no flexibility in change or rotation of participants in pairings or groupings. Pupils could be spread multi-stage across P1 to P7, and while benefitting cross-stage working, this may result in reduced peer challenge in learning or potential for sibling pairing/groups. The variety of skills, knowledge and wider experiences brought to the groups would be further restricted by roll size and may result in gender imbalances and inequity in provision of a full programme of wider school activities.

4.13 In comparison as the smallest school based on the three named closest to Inveravon Primary School, Glenlivet Primary School operates within a pairing

under a shared Head Teacher, school roll projections over the next five years remain near to 20 children on roll, with partnership approaches in place with the paired school; Tomintoul Primary School. This includes joined projects and staff professional and collegiate development activities while both schools retain their own unique identities. Children have regular opportunities to self and peer assess in each school as well as work in stage and cross stage pairings and groups.

- 4.14 In Aberlour and Knockando Primary Schools, children have regular opportunities to work in cooperative learning groups, on paired and in group activities with five and three classes formed in each school respectively. This further supports discussions and debate with a range of viewpoints and background of learners contributing to such activities. Class organisation within each school offers a blend of individual, group and class learning and teaching over the session.
- 4.15 The reopening of Inveravon would prove more restricted for children to develop skills for learning, life and work with fewer or no opportunities to work with others of a similar age and stage, which is not possible in a school size low in pupil numbers, for example in a school of 5 or fewer children based on potential future intake. Pupils may miss opportunities to develop wider skills for life in particular with limited immersion and interaction with a wide range of peers, where levels of attendance and participation may also impact further on this.
- 4.16 In Knockando, a skills framework has been developed following refresh of the school's Curriculum Rationale. This promotes equity of opportunity, supporting successes and achievement of all pupils within the formal and informal curriculum. Children use learning logs to reflect on skills development. In Glenlivet, curricular programmes that support sustained development of skills for learning, life and work have been developed where STEM (Science, Technology, Engineering and Maths), and the Career Education Standards/Career Management Skills are specific within the school's skills development pathway and staff continually look for ways to ensure children are challenged and motivated in learning. As the largest school in the Associated Schools Group, children at Aberlour Primary School benefit from wider skills development and transferability through various community projects and whole-school initiatives supported by partners including Primary Engineer, Christmas Enterprise, DYW initiatives and Moray Primary Science. Aberlour Primary School's Skills Progression "Skills for Stars" lead to weekly OSCARS which link to profiling and the Moray Skills Pathway.
- 4.17 Collaboration with wider staff in order to ensure a coherent and progressive curriculum can prove more difficult in a school with low roll size. As noted with Glenlivet Primary School paired with Tomintoul Primary School, a progressive curriculum differentiated to meet the needs of each child with a focus on engaging and active learning experiences is in place with opportunities for personalisation and choice across the four contexts for learning. Rich contexts for learning including the outdoor areas are embraced with child-led developments.
- 4.18 In Aberlour Primary School, the curriculum supports children to develop in the four capacities with planned inter-disciplinary learning for transfer of skills and knowledge with commitment to active learning and purposeful play. At

Knockando Primary School, there is a focus on skills development and building on prior learning through cohesive learner pathways making best use of the outdoors and local context. Children are increasingly benefitting from a range of play contexts that are adult-led, adult-guided or child-initiated. Pupils are developing social skills for sharing, co-operation, turn-taking, listening and organising through play. At Glenlivet Primary School, children have 'independent learning time' each day with child-led and adult-led play. A dedicated outdoor space supports development of a range of play and skills-based activities.

- 4.19 Strong partnerships across the Speyside Associated Schools Group exist with previous joint working on moderation, Numeracy, HWB policy and wider curriculum development. Each school values community and wider partnerships for supporting the Developing the Young Workforce agenda and ensuring children are prepared for the future world of work and employability. At Glenlivet Primary School, partnership working further supports skills development and curriculum enrichment where involvement in partnership projects enables pupils to build confidence and take increasing responsibility for their own learning – for example, learning for sustainability, science, expressive arts and literacy. Key partnerships with Tomintoul and Glenlivet Landscape, Crown Estates, Spey Fishery Board and Glenlivet Wildlife group have supported this.
- 4.20 In Knockando Primary School, a range of partners and local employers including Tamdhu Distillery, Knockando Estate, Knockando Athletics Club and the Shieling Project offer opportunities to learn and be active outdoors. Pupils at Aberlour Primary School have opportunities to engage with local employers and parents as employees for future employability and pathway opportunities, alongside working closely with partner agencies as the Enhanced Provision School for the Associated Schools Group. Schools in the Associated Schools Group also collaborate, including a week's residential stay at Abernethy Outdoor Centre for wider outdoor pursuit experience, team building and transition support.
- 4.21 Larger schools provide greater opportunities for pupil leadership and involvement in the ethos and wider life of the school as well as provision of a wider range of clubs and extra-curricular activities. At Aberlour Primary School, P7 House Captains and P6 Vice-Captains are elected each year to lead 'houses', pupil voice activities and inter-house challenges including sporting events, as well as contribute to whole school change initiatives. Community groups include Eco-schools, Rights Respecting Schools group (successful in achieving 'Gold' status), philanthropic and community engagement activities. Staff led a range of clubs and activities for all children including Bikeability, Running, Languages, Outdoor Learning, Choir, Nurture, Craft, Netball, Gardening and Leadership. P7 Play Leaders further develop their leadership skills through the 'Playground Squad', leading play activities and supporting lunchtime interaction sessions for younger pupils.
- 4.22 Play leaders at Knockando Primary School have been working with Active Schools to support play and lunchtime interactions and activities for younger pupils. This ensures that all pupils feel included at playtimes and lunchtimes and for the P6 and P7 pupils involved, this is further developing skills of leadership, organisation and problem solving. Other opportunities include Pupil Council, Global Citizenship, Community groups and wider pupil projects to enhance the

school and local community. Lunchtime clubs include Club Doodle, Netball Club, Book Club and Gardening Club where pupils also engage in dance/performance, athletics and wider Moray Badge participation.

- 4.23 At Glenlivet Primary School, child-led developments have led to enhancements to school grounds and cross-pollination investigation led to bee-keeping at the school. Real-life scientific and environment studies including Citizen Science research, the Big Wasp survey and RSPB Bird Watch further promote curiosity among learners, where a range of Monday clubs are also offered including Health club, STEM club and Rights Respecting School club led by the pupils. Through 'Glenlivet Go Getters' (Pupil Council) all children make a significant contribution to school leadership of change and views are taken on board. Bronze 'Rights Committed' accreditation has been achieved at Glenlivet with the school currently working towards Rights Respecting Schools' Silver 'Rights Aware' accreditation.
- 4.24 The range of interactions offered by all schools and the leadership and wider skills development opportunities presented strengthen capacity to work with others as part of a team, problem solve, make decisions and increase confidence in learners. As part of a peer group of a sufficient size, social interaction will enable further development of skills for learning life and work and build self-efficacy and esteem. A school size low in pupil numbers, for example in a school of 5 or fewer children based on potential future intake severely restricts opportunities for team sports, meaningful pupil leadership opportunities, clubs and other active recreational activities.
- 4.25 Aberlour, Glenlivet and Knockando Primary Schools are established as caring, nurturing and inclusive environments for learning. Aberlour Primary School as the largest Primary School in the Speyside Associated Schools Group holds Gold Rights Respecting Schools status and through their positive relationships policy, aim to ensure all in the learning community are committed to the school vision – 'we show respect and have fun so we can learn from everyone'. Pupil achievements are regularly celebrated and 'OSCARS' (Our School Can Achieve Results) focused on the four CfE capacities in para 4.8 above, are awarded to pupils in recognition of their positive contribution and achievements in learning.
- 4.26 Knockando Primary School is a caring and inclusive school, where staff work hard to get to know pupils and families well, supporting individual needs. A relational and restorative approach is taken to positive relationship management where the school is on the journey to Gold Rights Respecting School status. The school's Positive Relationship Policy has been developed and shared with the school community with a focus on inclusion, safeguarding, mental and emotional wellbeing and accessing supports.
- 4.27 Glenlivet Primary School has a very caring, nurturing and inclusive ethos with a strong community identity due to the unique school location. Individual reflective portfolios and learning logs support children to reflect on their learning against the four capacities and development of skills. Regular reflection against the school's 'Smarts' is undertaken by children to understand aspects of their own wellbeing. Staff actively promote inclusion and equity for all children and due to the size of school and one large multi-composite class, pupils are grouped by ability as opposed to stage, strengthening pace and challenge in learning. In

collaboration with all children, Glenlivet Primary School has developed a new Positive Relationships Policy reflecting the United Nations Convention on the Rights of the Child (UNCRC).

- 4.28 Aberlour Primary School has the Primary Enhanced Provision base for children with Additional Support Needs for the Associated Schools Group. Most children attend for part of the time, also attending mainstream classes. 'The Rainbow Room' provides specialist support for identified young people and support on group and one-to-one basis. Multi-agency links are in place with key partners including Health, Social Work and 3rd sector.
- 4.29 At Knockando Primary School, class teachers support all children where required with support assistant input for targeted need. Currently the Head Teacher in class contact time supports in provision of additional Support for Learning Teacher time, ensuring all children are supported as part of Moray's approach to staged intervention. In Glenlivet Primary School, there is effective planning to meet the needs of all learners, with clear progression pathways and universal/targeted interventions where necessary. A Support for Learning teacher works with identified pupils over two days per week with Pupil Support Assistant time for targeted needs.
- 4.30 All schools within Speyside Associated Schools Group benefit from their location in an area of outstanding natural beauty with access to extensive grounds and countryside. As a town school, Aberlour Primary School is in close proximity to Speyside High School as the local secondary school, with access to a range of external areas including a playing field, outdoor garden area and hard-standing playground/parking area. The school currently houses a local authority and partner nursery. The school is within walking distance of the secondary school's swimming pool, community sport facilities and multi-use games area.
- 4.31 The catchment of Knockando Primary School enjoys large grounds with easy access to woodland, fields, burns and wildlife supporting outdoor learning contexts. During snowy weather, the hill next to the school is used as a sledge/ski run. The school is well resourced with outdoor playing fields and play areas and additional multi-use spaces. With extensive outdoor areas or within close proximity to wider facilities in the case of Aberlour Primary School, opportunities for team sports and game-based activities can be maximised with a number of pupils on the roll of all three schools enabling such activities. Larger staffing complement and parent body further increases the likelihood of interested adults leading a broader range of activities. Glenlivet Primary School pupils regularly use the woods located behind the school for outdoor learning. A community play park organised by the Go Getters funded by Pupil Equity Funding and other community monies (Paul's Hill Windfarm and the Glenlivet and Inveravon Community Association) is used by children during school time and is available for community use out with school times.
- 4.32 Aberlour, Glenlivet and Knockando Primary Schools are committed to the 1+2 languages agenda. French is offered across all three schools with the addition of German in P5-P7. This provides the opportunity to work as a whole class and in small groups or pairings in participatory learning activities. Emphasis is on the spoken word and opportunities are planned through enjoyable activities such as group and class games, role-play and songs. Delivery of language learning

would be restricted within the multi-stage context of a school size low in pupil numbers, for example in a school of 5 or fewer children based on potential future intake. At Glenlivet Primary School, to meet the needs of current children in school, British Sign Language (BSL) will be delivered as a third language this coming year instead of German.

- 4.33 Aberlour, Glenlivet and Knockando Primary Schools benefit from a very small amount of Pupil Equity Funding and use this creatively to support identified children, with interventions reaching further than those where impact is directed. Aberlour Primary School focus in on Literacy interventions, Numeracy and HWB approaches. Glenlivet Primary School have identified gaps in Health and Wellbeing and run a successful Breakfast club, improving engagement in learning. In order to support Health and Wellbeing for all, swimming lessons have been provided where half of the school had never swam, building confidence in swimming, team working and wider mental, physical and social wellbeing effects. Knockando Primary School has supported literacy, numeracy and Health and Wellbeing with the purchase of various learning supports including additional Pupil Support Assistant hours for targeted support and Health and Wellbeing inputs.
- 4.34 Schools also look outwards and seek to source additional supports and wider experiences for children. Heritage Lottery Funding supported Glenlivet Primary School in a four year programme with a group of artists, significantly developing children's artistic and digital technology skills. Although this project has now finished, a legacy of skills and equipment remain which Glenlivet continues to make use of for learning and teaching.
- 4.35 Aberlour, Glenlivet and Knockando Primary Schools all have Parent Councils formed who meet regularly throughout the year. Aberlour Primary School Parent Council represent the views and interests of parents and pupils and support school improvement where there are currently ten parent members. Glenlivet Primary School regularly engages with parents and a supportive Parent Council take an active role in driving forward school improvement. There is a very strong sense of community with the school vision 'success for all' understood by all. Sustainable partnerships with parents and wider community further enrich the curriculum and children are supported to take an active part in the school and wider community.
- 4.36 At Knockando, an active and supportive Parent Council fundraise for school trips and activities and also contribute to bringing in specialists to enhance the curriculum with dance, sport, music, drama and outdoor education. Parents may also use their individual skills to support learners through 'Activity Afternoons'. If Inveravon were to re-open then there would be potential for a Parent Council to operate. However, with a small pupil cohort there would be a limited number of families able to participate – particularly where sibling groups may feature – resulting in greater reliance on a few individuals to support the school in this way.
- 4.37 Aberlour, Glenlivet and Knockando Primary Schools are central establishments within their respective communities with strong links to other organisations including local churches. Effective transition programmes and links with other Associated School Group schools including Speyside High School as the local secondary school are in place. Working in collaboration across the Associated

Schools Group, Head Teachers and schools ensure all children continue to access a wide range of experiences and activities, ensuring location does not detract from opportunities available. Glenlivet, Knockando, Tomintoul and Craigellachie Primary Schools also work in partnership to organise transition events throughout the year for Primary 7 pupils, to support team building and wider skills development in advance of secondary transition.

- 4.38 Section 3 of the Standards in Scotland's Schools etc Act 2000 requires local authorities to endeavour to raise standards and secure improvement in the quality of school education provided in our schools for all learners. It is Moray Council's view that the pupils from the Inveravon catchment derive educational benefits from their current attendance at other larger neighbouring schools. Formalising the current arrangements would provide a number of such benefits, judged against both the Moray and National criteria set out above.
- 4.39 As all pupils from the Inveravon Primary School catchment currently attend Knockando Primary School or Aberlour Primary School depending on current zoning arrangements or parental choice, no adverse effects for those pupils are expected to arise from the permanent closure of Inveravon Primary School.

5 Public Engagement

Public Meetings

- 5.1 All parents/carers and stakeholders were invited to discuss the proposal at one of the two public meetings, or a third online meeting which were scheduled to be held during the consultation period.
- 5.2 The first meeting was held at Inveravon Church on the afternoon of 27 September 2022 and chaired by Programme Manager, Learning Estate. It was attended by 11 members of the community. The minutes of the meeting are attached as **Appendix B**.
- 5.3 A second meeting was held at Speyside High School on the evening of 27 September 2022 and chaired by Programme Manager, Learning Estate. It was attended by 2 members of the community, who had both attended the earlier meeting. A record of the meeting is at **Appendix C**.
- 5.4 A third online meeting was planned for the evening of 28th September 2022. It was attended by 1 member of the community. A record of the meeting is at **Appendix D**.
- 5.5 During the meetings there were questions and comments regarding
- The status of the school leading up to the 2016/17 session
 - The process that led to the decision to mothball the school
 - The fall in school roll leading up the end of the 2016/17 session
 - The community consultation up to and following the mothballing decision
 - Maintenance of the grounds at Inveravon Primary School

Discussion with Parents (Inveravon Catchment)

- 5.6 At the time of the consultation 15 (fifteen) children of primary school age resided in Inveravon Primary School catchment area. All parents/carers of Inveravon catchment children were offered the opportunity to provide comments on the future of the school. During pre-engagement and statutory consultation parents/carers responded and all indicated a preference to continue to send their children to their current school rather than Inveravon Primary School, should it reopen. A collated record of the parent/carer comments received is at **Appendix E**.

Discussion with Pupils

- 5.7 As part of the consultation process, Head Teachers at Knockando, Aberlour and Glenlivet Schools discussed the proposal regarding the closure of Inveravon Primary School with their respective pupils.
- 5.8 Knockando Primary School has 11 children from the Inveravon Primary School catchment on its current school roll, Aberlour has 4 children from Inveravon catchment and Glenlivet has no children from the Inveravon catchment.
- 5.9 A full breakdown of the pupil responses is at **Appendix F**. Within the responses a minority of children expressed an interest in the school reopening. Of these almost all expressed their preference to remain at their current school if Inveravon Primary School did reopen.

Online Survey

- 5.10 During the consultation period parents/carers, stakeholders and community members were invited to take part in an online survey to express their opinion on the proposal. The survey provided a summary of the proposal regarding the closure of Inveravon Primary School. Participants were also given the opportunity to leave comments regarding the proposal.
- 5.11 A total of 33 people completed the online survey and a collation of their direct responses is provided at **Appendix G**. An analysis of the online survey is at **Appendix H**. The analysis of the responses highlighted that 40% (13) of respondents resided within the Inveravon Primary School catchment, 44% (16) of respondents were equally split between Glenlivet and Aberlour catchment and the remaining 16% (4) resided in the Knockando catchment. The high level outcome from the online survey was that 13 supported closure of the school, 14 disagreed and 6 did not respond to the specific closure question. Of the 16 parents that completed the online survey, 11 supported the proposal and 5 disagreed.

Staff Engagement

- 5.20 As Inveravon Primary School has not been operational since August 2017 and mothballed since September 2017, teaching staff that were employed at the

school have been employed at other establishments. Staff at Knockando Primary School and Aberlour School were given the opportunity to discuss the proposal with Education Scotland but none chose to do so.

6 Written Responses

- 6.1 During the consultation period between 29 August 2022 and 7 October 2022 representations were invited from statutory consultees and interested parties.
- 6.2 Officers received 5 written communications. Three responses were received from individuals in the community. One of these individuals was a parent of a child who was at Inveravon Primary school just prior to mothballing. Two of the responses were from local community groups, the Speyside Area Forum and Glenlivet and Inveravon Community Association.
- 6.3 None of the written responses supported the proposal.

7 Moray Council Response to Written and Oral Representations

- 7.1 The comments received during the consultation period fall into a number of themes. These have been carefully considered and the Council responses to these are provided below.

Statutory Consultation has not been robust, open and transparent

- 7.2 A comment was received that the '*consultation process has not been pursued with due diligence, especially in establishing the desired qualities for openness and transparency*'
- 7.3 Moray Council do not agree with the assertion that the consultation process has not been robust, open and transparent. A number of public engagement events were completed prior to the 24 August 2022 Education, Children's and Leisure Services Committee report seeking approval to undertake a statutory consultation regarding the closure of Inveravon Primary School in accordance with the School (Consultation)(Scotland) Act 2010.
- 7.4 At these pre-consultation meetings the next steps in the mothballing process were discussed and members of the community were able to ask questions and contribute future options for consideration. In addition to these public meetings, suggestion boxes were positioned around the catchment to allow any interested party to comment on the future of the school. Indeed, the majority of Inveravon Primary School catchment parent/carer responses were received through this approach. This engagement information is contained within the consultation proposal document at **Appendix A**.
- 7.5 This consultation process has followed the process set out in the Schools (Consultation)(Scotland) Act 2010 in engaging with all interested parties and providing every opportunity for community engagement. This Consultation Report is now made available to all interested parties to review prior to a Council decision on the future of Inveravon Primary School planned for 24 May 2023. Legislation allows for any person to make representations to Scottish Ministers

within three weeks of the Council taking their final decision to implement a closure proposal. The detail on the how to do this is at Para 12.5.

Reduction in School Roll

- 7.6 A number of comments made reference to the school roll during the 2016/2017 academic year. An example comment was that the *'official timeline of recorded individual pupil departures and enrolments had been reduced to a crude assertion that parents unanimously transferred their children to other schools for educational reasons in August 2017'*.
- 7.7 The Council has maintained throughout that the decision to mothball the school was the result of a school roll that fell throughout the 2016/2017 academic year. Although the detail of this was not available at the public consultation, subsequent analysis of the August 2016 to June 2017 school roll clearly shows that the roll fell from 13 to zero during this timeframe.
- 7.8 The school roll on 21 September 2016 was 13, with the breakdown by gender and year group shown below.

P1		P2		P3		P4		P5		P6		P7		Total	
Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male
2	0	2	1	3	0	1	0	1	1	0	2	0	0	9	4

SEEMIS data over the period December 2016 to June 2017 shows a gradual decrease in school roll. Detail of this is set out below.

- 22 December 2016 1 x placing request to Knockando Primary School
- 14 March 2017 1 x placing request to Craigellachie Primary School.
Reason given "more pupils to make transition easier for secondary school"
- 31 March 2017 1 x pupil move to school out with Moray
- 24 April 2017 1 x placing request to Knockando Primary School – no reason given. Initially refused but later accepted (12 June 2017) due to class numbers
- 17 May 2017 2 x pupils move to school out with Moray
- 1 June 2017 2 x placing requests to Knockando. Reasons given - "school is too small - would benefit from being in bigger school with more children of their own age" and "school is too small - behind with their work - benefit from being in bigger school with more children"
- 12 Jun 2017 1 x placing request to Craigellachie Primary school
reason given "moving house to Dufftown - pupil has attended Craigellachie before and has peers at the school"
- 15 Jun 2017 1 x placing request to Knockando Primary School – no reason given
- 20 Jun 2017 2 x placing requests to Knockando Primary School.
Reasons given for both is that if they stayed they would be the only pupil.

30 Jun 2017

1 x pupil move to school out with Moray.

Other than the 2 x placing requests received on 20 June 2017 the reasons provided for leaving Inveravon Primary school were educational ones.

The situation was that the school had a roll of zero at the end of the 2016/2017 academic session.

School Mothballing Process

- 7.9 Several comments were received during the consultation period questioning the mothballing process that Moray Council undertook and the lack of documentary evidence as to what was formally communicated to Inveravon Primary School parents prior to this.
- 7.10 Moray Council acknowledge that no documentary evidence has been discovered between the parents/carers of those children still at Inveravon Primary regarding the decision at the end of June 2017 that the school would not reopen for the 2017/18 academic session. However, correspondence between council officers during this period provides an insight into decisions and points towards a rapidly changing situation as a number of placing requests were received from parents/carers in June 2017 resulting in a school roll of zero for the start of the 2017/18 academic session. Although during the public engagements and later consultation public meetings on the future of Inveravon Primary School it has been stated by the Moray Council consultation team that there may have been letters/emails between the Council and/or school in May and June 2017 that could not now be found, it would appear that there was little if any formal correspondence during the critical run up to end of year (June 2016) period as the Education Service at that stage had no intention to not open Inveravon Primary School at the start of the 2017/2018 academic session.
- 7.11 Email correspondence dated 15 Jun 2017 between Education (Head of Schools and Curriculum Development) and Legal Services requested advice following receipt of placing requests from the parents/carers of the remaining 2 children on the school roll requesting a move to Knockando for start of 2017/2018 academic session. The email states that *“the roll at Inveravon primary has been dropping of late to the point that the last 2 remaining children will move to Knockando, effectively ‘mothballing’ the school. This has happened very quickly with parents, unfortunately, informing teaching staff yesterday”*
- 7.12 Email correspondence dated 19 Jun 2017 between Human Resources and Education to discuss a visit to discuss the impact on school staff with a forecast school roll of zero for the start of the 2017/2018 academic session.
- 7.13 Letter dated 27 June 2017 between Education Services and Principal Teacher informing them of compulsory transfer to Aberlour Primary School at start of 2017/2018 academic session as result of zero school roll at Inveravon Primary School.

- 7.14 Email correspondence dated 27 June 2017 between Human Resources and Head Teacher, Inveravon Primary school detailing the redeployment of other staff at the school for the 2017/2018 academic session.
- 7.15 Email dated 3 July 2017 between Public Relations and Education seeking approval for press release that stated *“given the low numbers at the school the remaining parents decided to seek placings at Knockando Primary. The council has accommodated these requests and provided transport. Staff have been redeployed within the school system locally. A report will be submitted to councillors early in the next session setting out options for the school’s future”*
- 7.16 Due to the zero school roll at Inveravon Primary School for 2017/2018 academic session the Moray Council’s Children and Young People’s Services Committee agreed on 23 August 2017 for a consultation to proceed with respect to the mothballing of Inveravon Primary School. A consultation event was held at Inveravon Primary School on Monday 25th September at 7pm to discuss the mothballing.
- 7.17 The report to the Children and Young People’s Services Committee on August 2017 records that in May 2017 the Head of Schools and Curriculum Development and the Business Support Team Manager met with parents and staff of both Inveravon and Knockando primary schools to answer concerns over falling school roll at Inveravon Primary school and stated that *“parents were assured that as long as there were pupils on the roll at Inveravon there would be no decision to mothball or otherwise”*.

Proposal to close the school is financially driven

- 7.18 A number of written and oral comments during both the engagement and the follow up statutory consultation stated that Moray Council were seeking to close Inveravon Primary School for financial reasons. The Council do not agree with this opinion and argue that the closure proposal is based on school roll and educational benefit.
- 8.1 During both the pre-consultation engagement and the consultation the majority view of parents/carers within the Inveravon Primary School catchment was that if the school were to reopen they would not move their children from their current schools. A similar response from children from Knockando, Aberlour and Glenlivet primary schools was that they would not wish to leave their current schools should Inveravon Primary School reopen.
- 8.2 Education Scotland back up the education benefits statement and their report highlights that children currently benefit from working with larger peer groups aligned to their age and stage. Their report also concluded that the predicted school roll in the wider area makes it unlikely that all four primary schools affected by this report could be sustained.

Staff changes during 2016 and 2017

- 7.19 A number of comments were received during the consultation period, although not from parents, that the staff changes that took place during the 12 months leading up to the mothballing of the school were somehow engineered by the Council and resulted in a “weakening of the school’s teaching provision” which “significantly damaged its educational efficacy”. A request was made to provide more detail over the staffing changes.
- 7.20 The Council refute the assertion that staffing changes at Inveravon Primary School were engineered. Teaching staff leave for a number of reasons such as career progression or seeking out new challenges. Moray Council cannot stop career development or staff desire to move on, but do work to support schools where this may have happened with backfill and new appointments. Schools may wish to keep teachers they hold in high regard but this is out with the local authority control and down to individual staff wishes. The Council continue to support recruitment to posts and staff professional development but at times have a limited supply available. The following paragraphs provide more specific detail that is requested on the circumstances of staff changes at Inveravon Primary School in 2016 as requested during consultation.
- 7.21 On 5 May 2016 Education Services informed Inveravon Primary School parents/carers that the Head Teacher had been appointed, following the standard recruitment process, to become Head Teacher for Linkwood Primary School, a new 450 place primary school that was at that time in construction. An acting Head Teacher position was advertised and while the process for recruiting for a permanent Head Teacher was underway the appointment of an Acting Head Teacher for Inveravon Primary School was made on 29 June 2016.
- 7.22 In May 2016, the Inveravon Primary School Principal Teacher, after another recruitment process, was appointed Head Teacher at Botriphnie/Newmill and a replacement Principal Teacher appointed.
- 7.23 In 19 December 2016 the process for recruitment of permanent position Head Teacher at Knockando and Inveravon was unsuccessful in finding a long term suitable candidate to appoint. The Acting Head Teacher remained in post while the recruitment process was reset.

School building condition

- 7.24 A number of comments were made that the condition of the school had been allowed to decline during the period that it has been mothballed. One such comment is that *‘we note that certain elements of the condition of the building have deteriorated from condition C to D during the time of indecision by Moray Council. In essence the failure to maintain the building essentially means the building is no longer ‘fit for purpose’ as an educational establishment’*
- 7.25 At the meeting to discuss the school mothballing in September 2017 it was explained that the school building would be maintained in a wind and water tight condition – which Moray Council have done. During this same period, due to budget constraints, Moray Council has had to prioritise building maintenance across the school estate and focus on building fabric and services that had a

high risk of closure to an operational school. This policy of ‘make-do-and mend’ implemented a regime of affordable controlled management of those condition factors that had fallen from Condition C (Poor) to Condition D (Bad), as defined within the Scottish Governments Condition Core Fact guidance, and had a high closure risk if not addressed.

- 7.26 A full condition survey of Inveravon Primary School was completed in 2022 and graded the overall school Condition as C (42.27%). Within that overall grading a number of factors were identified as Condition D. A comparison between the survey conducted in June 2022 and the previous one in April 2013 is set out in the table below.

	Roofs	Floors	Ceilings	Externals	Internals	Sanitary	Mechanical	Electrical	Decoration	FFE	Externals	Outdoor Sports	Overall	Grading
Weight (%)	15	7	1	20	7	5	14	11	2	5	10	3		
April 2013	B	B	B	B	B	B	D	D	B	B	C	N/A	59.54%	C
June 2022	C	D	C	C	B	C	D	D	C	B	D	N/A	42.27%	C

- 7.27 During the 9 year interval between condition surveys although a number of areas have declined from B to C, and in one case B to D, this managed deterioration repeats a similar pattern to other schools in Moray, schools that have not been mothballed for nearly 6 years. This is not an ideal situation, but as previously explained is as a result of the ‘make-do-and-mend’ approach which has been applied across the school estate.

School inspection reports not being made public

- 7.28 One written respondent made reference to the lack of access to school inspection reports and that *“appropriate detailed documentation has not been put into the public domain to allow interested parties to track the apparent educational decline of Inveravon Primary School in 5 years from a position of outstanding excellence”*
- 7.29 Inveravon Primary School was last inspected by Education Scotland in November 2011 with the report published in January 2012. The public report was shared with parents/carers. The evaluation for Inveravon Primary School were, against the three important quality indicators, as follows:

Learners’ experiences	excellent
Improvements in performance	very good
Meeting learning needs	very good

No other formal inspections were undertaken by Education Scotland between 2011 and 2017. Although Quality Improvement Officers have provided support to Inveravon Primary School to continue to improve they did not undertake any formal inspections and therefore there is no additional documentation available to publish in the public domain.

- 7.30 The premise in the written response that there was an “*apparent educational decline*” at Inveravon Primary School between 2012-2017 is not evidenced and is therefore only an opinion that is not supported by Moray Council.
- 7.31 The decision to mothball the school and the current proposal for school closure does not question the past educational performance of Inveravon but rather reflects the situation in June 2017 – when the school roll fell to zero - and the current situation where parents/carers in catchment, who have expressed an opinion, have no desire to move their children to Inveravon if the school were to reopen.

Status of School Website

- 7.32 A number of oral and written responses made reference to the fact that the link to the Inveravon Primary School website was removed from the Moray Council website at or just before mothballing in September 2017, therefore depriving potential parents/carers from identifying Inveravon as their primary school of choice.
- 7.33 The Council acknowledge that the website link should not have been removed from the Council website and have apologised for this at pre-consultation and consultation public meetings. It was an honest error by the Council officers at the time and nothing more. As soon as the Moray Learning Estate team were made aware of this the website was updated and the school reinstated on the school list..
- 7.34 The Council accept that as a result of the website not being available some prospective parents in the local area may have not been aware of the school situation. However, the Council do not believe that awareness of the school situation would have only been through the website. The dual Inveravon/Knockando Head Teacher remains extant and they were aware of the status, the Parent Council at Knockando are also aware (a number of members have been and are Inveravon residents) and it is assumed than within a small community the situation with the ‘local’ school would be shared by word of mouth.
- 7.35 Whether an active website would or would not have made new Inveravon catchment parents/carers aware of the option to request to send their children to Inveravon Primary School, and potentially resulted in a viable school roll at some stage over the last 5 academic sessions, cannot be proven either way.

Status of Parent Council funded school assets

- 7.36 A number of oral and written comments made reference to the removal from the school site of items that had been purchased by the parent council without permission and described the actions “as the council’s wanton ‘vandalism’ of the amenities in the school grounds following mothballing”.

- 7.37 This issue was first raised at a meeting with the community on 25th October 2017 and subsequently in an MP Enquiry. A verbal response was provided to the meeting and a written response to the MP from the then Head of Lifelong Learning, Culture and Sport dated 26 October 2017.
- 7.38 The letter stated that the equipment had been removed by a janitor who was on site to collect materials that were not to be left on site while the school was mothballed and to supervise a team of young people undertaking ground maintenance tasks as part of their community service orders. The janitor noted the outdoor equipment and decided this could be put to good use elsewhere. Despite permission to remove the equipment being denied by the Education Resource Manager at the time he went ahead with removal.
- 7.39 In the letter responding to the MP enquiry it was stated that Moray Council did offer at the community meeting on 25 October 2017 to return the equipment and reinstate the ground to its original condition. Although the equipment was returned to the site, it is unclear why it was not reinstated as the Moray consultation team can find no further correspondence on the issue. The dismantled equipment is currently stored inside the school building.
- 7.40 It was noted in the letter that the equipment had been gifted to the school by the Parent Council. However, once the equipment had been gifted to the school it became the property of the school and therefore Moray Council.
- 7.41 Should the decision be to close the school there is an extant request from a Glenlivet community group to move and install the outdoor equipment within the grounds of Glenlivet Primary School. The Council are supportive of this request.

Full rezoning to Glenlivet

- 7.42 A number of written comments made reference that in the event of a closure of Inveravon Primary School that there was no option to fully rezone the Inveravon catchment to Glenlivet Primary School. It has been stated that *“the fact that the rezoning options for the children of Inveravon precludes them from going to Glenlivet Primary School (the other school within our parish) is most concerning. Some Inveravon children will have to travel further to school each day and in winter especially, the B9008 to Glenlivet is kept in reasonable condition, whilst the B9102 is much more likely to be closed with drifting snow”*
- 7.43 During the 2016/17 school roll decline no placing requests were received to transfer children to Glenlivet Primary School. Currently none of the parents/carers and children (currently 15) living within the current Inveravon Primary School catchment attend Glenlivet. The parent/carer feedback received during engagement and consultation is that if Inveravon Primary School were to reopen then they would not chose to send their children there. It is the opinion of Moray Council that the same position would be taken should the Inveravon Primary School catchment be fully rezoned to Glenlivet Primary School.
- 7.44 All Inveravon Primary School catchment children have been travelling to both Knockando (free transport) and Aberlour (private arrangements) primary schools since August 2017 without any issues notified.

- 7.45 With any of the closure options proposed parents/carers within the Inveravon Primary catchment are still able to submit a placing request to send their children to Glenlivet Primary School and provided there a suitable places available then this is highly likely to be accepted. However, they would not be eligible for free transport.

Community support for a school ignored

- 7.46 There were a number of oral and written comments that opined that the community support for the school was ignored by the Council during mothballing, public engagement and consultation.
- 7.47 The strong support for the school by a small but dedicated community group has been and is acknowledged. If there was a viable school roll at Inveravon Primary School (and current policy is that operational viability is reviewed if a school roll falls below 15) then re-opening the school would be a serious consideration. However, there is no desire by parents/carers within the Inveravon catchment to move their children to Inveravon Primary School were it to reopen. A school cannot reopen if it has no pupils, no matter if there is a community desire for it to do so.
- 7.48 The expectation is that the land ownership, and by inference the school building, will transfer to Ballindalloch Estate in the event of school closure. The Education Scotland report states that *“should the proposal (to close the school) be approved it will be important for Moray Council, Ballindalloch Estate and community organisations to work together to find an appropriate use for the site and building”*. The Council acknowledge and agree that this would be the next step should the school close. If this is the outcome then the community use options proposed during public engagement and consultation have been collated and will be shared with Ballindalloch Estate in order to facilitate any early discussions on future use.

8 Education Scotland Report

- 8.3 In line with the Schools (Consultation) (Scotland) Act 2010, a report was produced by Education Scotland on the educational aspects of the proposal. The full report is attached as **Appendix I**.
- 8.4 The report from Education Scotland was prepared by His Majesty’s Inspectors of Education (HMIs) in accordance with the terms of the Schools (Consultation)(Scotland) Act 2010. The purpose of the Education Scotland report is to provide an independent and impartial consideration of Moray Council’s proposal to close Inveravon Primary School.
- 8.5 HMIs considered:
- the likely effects of the proposal for children and young people who live in the catchment area of the school;
 - any other likely effects of the proposal;

- how the council intends to minimise or avoid any adverse effects that may arise from the proposal;
- the educational benefits the council believes will result from implementation of the proposal, and the council's reasons for coming to these beliefs;
- any reasonable alternatives to the closure of Inveravon Primary School; and
- the likely effect on the local community and different travelling arrangements with the proposal to close a rural school.

8.6 In preparing their report, HMIs undertook the following activities:

- attended both public consultation meetings held on 27 September 2022;
- considered all relevant documentation provided by Moray Council in relation to the proposal, specifically the educational benefits statement and related consultation documents, written and oral submissions from parents and others; and,
- visited Inveravon Primary School, Knockando Primary School, Aberlour Primary School and Glenlivet Primary School with the intent to view the schools and discuss the proposal to close Inveravon Primary School with relevant consultees.

8.7 Education Scotland are of the view that there are sound reasons for Moray Council to consider the long term viability of Inveravon Primary School. HMIs agree that the proposal by Moray Council will result in educational benefits for children in the Inveravon Primary School catchment area. They state that the proposal provides clarity for the parents and for staff in neighbouring schools that children have attended since 2017 and addresses the future education provision in the area.

8.8 The report highlighted that children currently benefit from working with larger peer groups aligned to their age and stage.

8.9 The report concluded that the predicted school roll in the wider area makes it unlikely that all four primary schools affected by this report could be sustained.

8.10 Education Scotland noted that parents/carers are fairly evenly split between Option 1, all of the catchment area allocated to Knockando Primary School and Option 3 where it is split across the three neighbouring primary schools.

8.11 Education Scotland recognise that the mothballing and proposed closure of Inveravon Primary School is a loss to the community. They highlighted the importance of Moray Council working with Ballindalloch Estate, who land ownership will revert to in event of school closure, and the local community to explore options for both the school building and land, should the proposal be approved.

8.12 The Council welcomes the Education Scotland report and accepts its findings. In response to the findings within the report, Moray Councils response is as follows:

- The Council has acknowledged the community concern about the future of the land and school building. Should the proposal go ahead the importance of Moray Council, Ballindalloch Estate and community groups and organisations to work together to find an appropriate use for the site and buildings is recognised.
- The Council accept that there is a view that the mothballing process was poorly handled. Para 7.10 provides more detail around the rapidly changing situation leading up to the school not opening in August 2017 and subsequently mothballing in September 2017 which we believe mitigates this view. In order to avoid any future confusion in terms of actions and communications around any future mothballing Moray Council have recently implemented a more robust process.

9 **Alleged Omissions or Inaccuracies and Additional Information**

- 9.1 Section (10)(3) of the 2010 Act also places a requirement on the Council to provide details of any inaccuracies or omission within the proposal document which has either been raised by the consultees or identified by the Council itself.
- 9.2 This section of the 2010 Act also requires the Council to provide a statement on the action taken in respect of the inaccuracy or omission, or, if no action was taken, to state that fact and why.
- 9.3 Officers are required to publish its response to representations made during the consultation period within its final Consultation Report.
- 9.4 There were no areas identified by consultees as being inaccurate or omitted from the proposal document during the consultation period.

10 **Compliance with Section 9(1) of the Schools (Consultation) (Scotland) Act 2010**

- 10.1 Section 9(1) of the Schools (Consultation) (Scotland) Act 2010 states that:

After the Education Authority has received HMIE's report, the Authority is to review the relevant proposal having regard (in particular) to

- (i) written representations received by the Authority (from any person) during the consultation period,
- (ii) oral representations made to it (by any person) at the public meeting,
- (iii) HMIs report

- 10.2 The feedback from the consultation, and all the questions and comments raised, were considered in detail by officers. Data and factual information was checked where required and advice and input was sought from other Council Services where needed to consider the issues raised. This ensured that the Council met the requirements to review the proposal under section 9(1) of the 2010 Act.

- 10.3 Officers of the Education Service and Education Resources and Community Service have listened to the points made at the public meeting and have considered equally carefully the written representations received.
- 10.4 The Education Service's position (as the Education Authority) is set out in Section 4 of this report.
- 10.5 The educational benefits were reviewed in respect of the Education Scotland report and representations made. Factors included in the Education Scotland report or representations made regarding any aspect of the educational benefits were considered.
- 10.6 There were no aspects included in the representations made which provided a different conclusion in relation to the rural school factors.

11 Compliance with Sections 11A to 13 of the Schools (Consultation) (Scotland) Act 2010

11.1 Inveravon Primary School is a remote rural school, therefore the Schools (Consultation) (Scotland) Act 2010 requires the Authority to have special regard to the following factors:

- (a) the likely effect on the local community in consequence of the proposal,
- (b) the likely effect caused by any different travelling arrangements that may be required in consequence of the proposal.

11.2 As Inveravon Primary School is a rural school, special regard was paid to the rural school factors.

Likely Effect on the local community

11.3 Inveravon Primary School has not operated as a school since August 2017. The Council recognises that Inveravon Primary School was a sustainable learning community prior to the school roll falling to zero at the start of the 2017/18 session. It is also acknowledged that the uncertainty surrounding the future opening of the school has impacted on the community and it is hoped that this statutory consultation will give clarity to the community and a sense of certainty regarding the future of their children's education.

11.4 During the engagement and consultation process surrounding the future of Inveravon Primary School full endeavours have been made to ensure all residents within the catchment area have been communicated and consulted with to ensure that the impact on the community is understood by officers.

11.5 Prior to launching the statutory element of the consultation, opportunities were made available to all members of the community to either suggest ways to make the school viable again or alternative uses for the building that would benefit the community.

- 11.6 There were no suggestions from the engagement and consultation that could be seen as ways of ensuring a viable future school.
- 11.7 The alternative uses proposed during engagement and consultation will be shared with the Ballindalloch Estate, to whom the land ownership, and by inference the building, will transfer in the event of the school closure, for them to consider as future community use options.

Likely effect caused by different travel arrangements

- 11.6 Since 2017 free transport has been provided to those children in the Inveravon Primary School catchment who attend Knockando Primary School. During this same timeframe no transport has been provided to those children in the catchment who attend Aberlour Primary School.
- 11.7 The rezoning proposals in both Option 2 and 3 to this closure proposal see free transportation now available to both Aberlour and Glenlivet primary schools within their respective extended catchments. This will immediately benefit children in and around the Marypark area who attend Aberlour Primary School.

12 Representations to Scottish Ministers in terms of Section 15 of the Schools (Consultation) (Scotland) Act 2010

- 12.1 If the Authority makes a final decision to implement the proposal, it will require to notify Scottish Ministers of that decision and provide them with a copy of the proposal document and consultation report. This must be done within six working days of the decision. Scottish Ministers have an eight-week period from the date of the final decision to decide if they will call-in the proposal.
- 12.2 Within the first three weeks of that eight-week period, Scottish Ministers will take account of any relevant representations made to them. Until the outcome of the eight-week call-in process is known, the Authority cannot proceed to implement the proposal.
- 12.3 If Scottish Ministers call-in the proposal, they must refer the proposal to the Convener of the School Closure Review Panels who may refuse to consent to the proposal or grant their consent to the proposal subject to conditions or unconditionally.
- 12.4 It should be noted that the legislations allows for any person to make representations to Scottish Ministers within three weeks of the Council taking their final decision to implement a closure proposal. Moray Council expect the decision on whether or not to implement this closure proposal at its meeting on 24 May 2023. If the decision is taken to implement the closure proposal, any representations to Scottish Ministers, therefore, in this context need to be with the Ministers within three weeks of this date. Therefore, any representations must be made to Scottish Ministers by 14 June 2023.
- 12.5 Anyone wishing to make representation to Scottish Ministers during the three week period referred to above should do so by email to schoolclosure@gov.scot or in writing to:

The Scottish Government
School Infrastructure Unit
2A (South) Victoria Quay
Edinburgh EH6 6QQ.

13. Conclusion

- 13.1 In review of the oral and written submissions to the formal consultation and survey results, it is clear that there is stakeholder support for the proposal to close Inveravon Primary School.
- 13.2 Officers have carefully considered the opportunities, issues and challenges identified by stakeholders during both the informal engagement and formal consultation processes.
- 13.3 The Council now has the following options:
- Adopt the proposal to close the school; or
 - Amend the proposal in a minor way; or
 - Amend the proposal significantly and undertake a further consultation exercise on a new proposal; or
 - Withdraw the proposal and maintain the status quo.

Each option is discussed below.

Adopt the Proposal

- 13.4 If the Council chooses to adopt the proposal and close Inveravon Primary School on a permanent basis then one of the three options for Inveravon Primary School, outlined in the proposal document, would need to be chosen.
- 13.5 The most popular option amongst participants was Option 3, to close Inveravon School and split the current catchment between Knockando (the majority area), Aberlour and Glenlivet. This option was supported by 14 (51%) of the 27 participants who responded to this question of the online survey. The option was discounted by 9 (33%) of the 27 participants who responded to the question in the online survey. The Council position is that this Option would most align with the current parental choices to send their children to either Aberlour or Knockando primary schools.
- 13.6 If the Council adopts the proposal, it would be on the basis that it aligns with the wishes of the majority of current parents/carers in the Inveravon Primary School catchment AND that the educational benefits set out in the proposal document would materialise and a period of uncertainty for the community would come to an end. Children will have access to greater learning opportunities and experiences and increased socialisation through being part of a larger school. Opportunities to participate in peer support, classroom learning, learning groups across stages and between classes and opportunities to engage in lunchtime, after school and team events will be increased. The primary schools of

Knockando, Aberlour and Glenlivet have the capacity to accommodate additional children. The proposal will assist the Council to deliver 'Best Value' through making more efficient and effective use of its resources.

Amend the proposal in a minor way and adopt

- 13.7 During the consultation period no suggestions were received from stakeholders that would require a minor amendment to the proposal.

Amend the proposal significantly and undertake a further consultation exercise on a new proposal

- 13.8 The Schools (Consultation) (Scotland) Act 2010 requires that changes to the school estate are subject to rigorous statutory consultation. Any significant amendments to the proposal would require a full consultation with pupils, parent/carers and the wider community of all affected by the proposed schools.
- 13.9 Allowing for appropriate governance the process can take in the region of nine months to complete.
- 13.10 This is considered to be unreasonable to go through another lengthy statutory process. The uncertainty surrounding the future of the school has significantly impacted on the community and it is hoped that this statutory consultation to close Inveravon Primary School will give clarity to the community and a sense of certainty regarding their children's education.
- 13.11 Having reviewed the Education Scotland report and feedback from consultees, officers concluded that the basis of the original proposal continues to be the most appropriate conclusion for Inveravon Primary School.

Withdraw the proposal and maintain the status quo

- 13.12 This option would be to continue to mothball Inveravon Primary. Maintaining the status quo would continue the uncertainty for the community. The school would remain mothballed and the building would continue to draw on Council revenue finances and require additional significant capital investment in the future to be upgraded to Condition B status.
- 13.13 Withdrawing the proposal, the Council would be failing to recognise or respond to the educational and social benefits for Inveravon catchment children. Education Scotland has recognised the proposal has the potential to deliver overall educational benefits for the children within the Inveravon catchment area. Children are currently benefitting from working with larger peer groups closely aligned to their age and stage.

14. Recommendation(s)

- 14.1 The recommendation of officers is that the Council should adopt the proposal to permanently close Inveravon Primary School and re-assign**

its catchment area between Knockando, Aberlour and Glenlivet primary schools. Children would also continue to receive school transport to their catchment school where eligible.