

Annex 2: Analysis of feedback

Final feedback from the Board of Trustees

- 1 The Board provided the following arguments against closure:
 - a) A number of errors of fact were contained in the initial report on which you made your interim decision, in spite of the Board having advised the Ministry of these errors and corrected them. The repeated quoting of factual errors brings into question whether your decision was based on complete and accurate information:
 - It is untrue that the Board requested closure during discussions with the Ministry in 2017.
 - It is untrue that there were no students enrolled at 1 March 2018. There were four students seeking to attend the School.
 - The Ministry did in fact discourage some parents from enrolling their children, telling them to enrol them at Martinborough School. (See page 4/5 of the submission).
 - The number of preschool children in the area is understated.
 - The number of houses in the area is not 32, but 101, as advised in submissions.
- 2 In regard to other content of the previous report the Board makes the following submissions.

“The school has a very small roll and future rolls are uncertain/ unsustainable”

 - b) The School currently has eight students with enrolments later this year pending, to a roll of 10/11. Further expressions of interest run to 2022, with a potential roll of 12-13 in 2019.
 - c) The Ministry has stated publicly that “there is no roll number at which we would automatically consider closing a school. Rather, when a very small school does close it’s more often because a board of trustees has voluntarily sought to close because the board believes a school isn’t educationally viable and there are other good educational options available nearby.”
 - d) Neither of these factors apply to Tukurumuri School.

“There are very few pre-school aged children in the area nearing school age.”

 - e) There are nine such children, five of whom are due to start school within the next year. The statements in the previous Education Report about numbers and ages of children in the area, and the number enrolled at the playgroup, are incorrect.

“There is alternative provision for children in the surrounding schools”

 - f) The surrounding schools are not practically available for many families. Travel from the coast to Martinborough School can be over 200 km per day of travel, on single lane metal roads. Moreover, while the road from the coast to Tukurumuri is usually passable, the road from Tukurumuri to Martinborough is often closed due to even moderate wet weather, sometimes for days. This would prevent attendance, or trap students in Martinborough, some with no family to stay with.

“Currently 10 kids from Tukurumuri are attending other schools”

g) There are currently seven such children. Their personal reasons for doing so cannot reflect negatively on Tukurumuri School. Four of these have at least one parent working in Martinborough, and two are Year 8 students, who would be leaving Tukurumuri School at the end of this year anyway. S9(2)(a) OIA

h)

i)

j) All the children currently “bypassing” the School live close to it, so Martinborough is a viable option. This is not the case for those living at or towards the coast.

Other arguments

k) There is only one parent representative vacancy on the Board of Trustees. The Board would have addressed this by now if it had not been told to hold off while closure is being considered.

l) The Ministry implies that people working in the area and sending their children to the School is not a sustainable long-term proposition. The Board asks “What is, then? Surely any town school ... depends on people living and working in the area and their kids attending local schools?”

m) The error in the number of houses in the area remains incorrect in spite of being corrected – it is over 100 according to South Wairarapa District Council figures; not 32.

n) The claim in paragraph 14 that students are likely to move onto a full primary school is nonsensical when Tukurumuri School is a full primary school.

o) The claim (paragraph 15) that some members of the community are actively working to bring families with children into the area and have done for some years is not a sustainable means of maintaining the roll is unsupported. Such initiatives go back over 30 years of fluctuating rolls. The Board asks “how else a small rural school is supposed to maintain its roll?”

p) The Board also question why you, in response to certain written Parliamentary questions, stated the Ministry had no information on those matters, yet the information was included in the Board’s original submissions. The Board believes either you did not receive the information or did not consider it. The Board also asks why it was claimed there were 24 children in the area and why the age range of 5 to 10 was used.

q) There were pages missing from the copies of annexes to the submissions, and the Board believes that the drafter, and therefore you, had incomplete information. It does not accept that the scanning error addresses this adequately. We have confirmed that you received the full version of the submission and Appendices. (In fact the drafter and you had the full submissions. The scanning was only done for filing purposes and to send material to the Board.)

Letters opposing closure

3 Letters supporting the Board and Steering Group position opposing closure make the following points.

- Children living on or near the coast are essentially written off in the report as having to use the Correspondence School. In fact internet access in that area is graded “very poor” and satellite internet access is unaffordable by many. Further, not all parents are suited to being educators on this basis and/or cannot afford to take the time out of their working day to do so. There is no valid option for many families other than to have a school at Tuturumuri.
- The fact that Tuturumuri is not on the South Wairarapa Council’s current growth plan is a reflection on the Council, not the Tuturumuri district and community.
- The poor ERO report of 2013 should not be a consideration as that temporary problem was quickly resolved and the School is back on a three year review cycle.
- Many rural schools have very small rolls yet provide a good education, just like Tuturumuri School.
- The provision of schooling is essential for attracting farm staff. This is particularly so in the district as the topography means younger staff, typically with school-aged children, are needed to cope with the concomitant physical demands.
- Finding a suitable teaching principal is the Ministry’s problem: the School has not historically had difficulty attracting staff. (Note: according to the 2013 and 2015 ERO reports there was an unsettled period from 2011 to 2015, with various staff changes. There does not appear to have been an issue prior to that timeframe).
- The Ministry’s cost analysis does not take into account either the private cost of significantly increased transport distances or the potential negative economic impact on the area if sufficient suitable farm workers can no longer be attracted.
- S9(2)(a) OIA

- The School’s roll will always fluctuate due to a range of factors. A short term downturn is not a reason to close a school the community as a whole relies on.
- The facilities available at the School are evidence of the community’s commitment and support, having fundraised for these facilities. The School is at the centre of a vast farming area that, as a community, needs this to survive.
- Children thrive in the small school setting, compared with less impressive academic achievement in larger schools.
- If children are bypassing the School the reasons for doing so need to be identified and addressed – not automatically used as a justification for closing the School.
- The playgroup running at the School on Thursdays also provides an important community link for a dispersed population, especially for newcomers to the district.

- The other facilities at the School are valuable to the community – tennis court, swimming pool, and library.
- The School should be at least kept open for another year or two to regrow the roll.

Submission supporting closure

4 One letter from a local couple who are parents of school aged students supported closure. [REDACTED]

The reasons given were as follows:

S9(2)(a) OIA

- The per-student cost of retaining the School would be better deployed across the schooling network in general. The premium paid for retaining rural schools with small rolls is socially unacceptable.
- The limited school roll is not conducive to the collaborative, team based, self-directed learning they feel is important.
- They dispute the claim there is widespread community support for the School, maintaining there could have been 190 submissions based on current housing stock at 1 submission per household, not the 28 received (14 percent).
- There is a very low, stable population and a small number of transitory/seasonal visitors. The School's roll has, over the past dozen years, reflected the educational needs of the local community, however, any spikes in roll in recent years have been short lived and fuelled by transitory/seasonal families.
- No formal process has started regarding claimed plans to create some kind of Tukurumuri village to increase the local population, and there is no local support for this project in the immediate community.
- Possible property devaluation resulting from closure is an individual financial matter and irrelevant to the decision to be made.

5 The couple perceive there is a group determined to retain the School that is not reflective of the community, and whose statements are propagandist.

Ministry response to feedback

6 The Ministry comments in response to the above Board arguments are below:

- a) It is untrue that the Board requested closure during discussions with the Ministry in 2017.

Response:

The then principal and acting Chair requested information on all options for the School, including information about closure processes, by letter dated 1 September 2017. Both have left those positions, and the former principal has left the area. We acknowledge that the current Board does not support closure, and have proceeded on that basis.

- b) It is untrue that there were no students enrolled at 1 March 2018. There were four students seeking to attend the School.

Response:

The School was not operational on 1 March 2018. Enrolment is official on the students first day of attendance. There were no students attending, nor entered into ENROL at this date. We have based this final analysis on the current roll and projections.

- c) The Ministry did in fact discourage some parents from enrolling their children, telling them to enrol them at Martinborough School. (See page 4/5 of the submission).

Response:

We advised the parents who had enquired about the School of options at the time. This included advice from NZSTA that students cannot be enrolled at a school without a principal. We arranged to meet with one family, who failed to keep the appointment. An Emergency Staffing Principal was appointed on 28 February 2018, as soon as we were aware that children were confirmed as moving back into the district and were intending to enrol at the School. The Emergency Staffing Principal began on 5 March. Children were then able to be enrolled. We have based this final analysis on the current roll and projections.

- d) The number of preschool children in the area is understated.

Response:

The numbers were provided by the Playgroup in its annual funding application. Not all Playgroup children will attend Tukurumuri School, as confirmed by parents at the time. The Board has provided eight expressions of interest out to 2022. At least three of these live in Martinborough, with two of them in close proximity to Martinborough School. We have used this Board provided list in preparing this report.

- e) The number of houses in the area is not 32, but 101, as advised in submissions.

Response:

S9(2)(a) OIA

The figure of 32 was provided in the independent facilitator's report, but was initially provided to her by [REDACTED]. We have provided detailed figures regarding the number of dwellings and inhabitation in this report.

- 7 In regard to other content of the previous report the Board makes the following submissions.

- a) "The school has a very small roll and future rolls are uncertain/ unsustainable"

Board comment:

The School currently has eight students with enrolments later this year pending, to a roll of 10/11. Further expressions of interest run to 2022, with a potential roll of 12-14 in 2019.

Response:

We acknowledge the current number of students and expressions of interest running to 2022. We have based this report on those figures. We also note that in the past expressions of interest or pre-enrolments have not always become actual enrolments.

- b) The Ministry has stated publicly that “there is no roll number at which we would automatically consider closing a school. Rather, when a very small school does close it’s more often because a board of trustees has voluntarily sought to close because the board believes a school isn’t educationally viable and there are other good educational options available nearby.” Neither of these factors apply to Tukurumuri School.

Response:

The Board has requested information under the Official Information Act 1982 about the number of schools with rolls under 10, and whether discussion have been had with them about closure.

We have not automatically proposed closure due to the small roll numbers. We have responded to a request from the former principal and Acting Board Chair. We have followed the prescribed consultation process. We recognise the situation has changed since late 2017 and early 2018, and have prepared this report based on current knowledge and projections.

- c) “There are very few pre-school aged children in the area nearing school age.”

Board comment:

There are nine such children, five of whom are due to start school within the next year. The statements in the previous Education Report about numbers and ages of children in the area, and the number enrolled at the playgroup, are incorrect.

Response:

We are unable to confirm the exact number of pre-school children in the area. Reports from the community differ in number. The playgroup run in Tukurumuri is funded on an average of three and a half places. When the Board consulted with their community in late 2017, there were no known future enrolments. The information provided to us by the Board has indicated there are eight pre-school children identified by expressions of interest who may enrol at the School over the next four and half years. We have used this figure as a basis of our future analysis.

- d) “There is alternative provision for children in the surrounding schools”

Board comment:

The surrounding schools are not practically available for many families. Travel from the coast to Martinborough School can be over 200 km per day of travel, on single lane metal roads. Moreover, while the road from the coast to Tukurumuri is usually passable, the road from Tukurumuri to Martinborough is often closed due to even moderate wet weather, sometimes for days. This would prevent attendance, or trap students in Martinborough, some with no family to stay with.

Response:

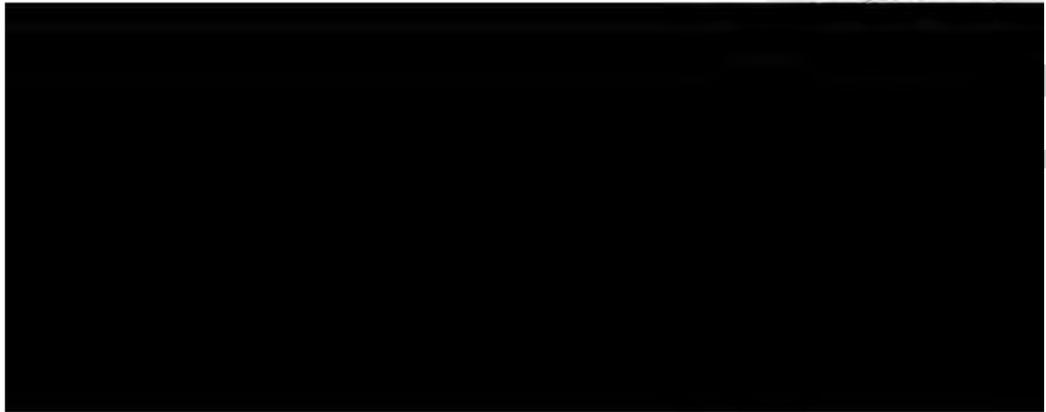
It is correct that the other three schools in the area have the capacity and capability to provide education to the Tukurumuri students. We acknowledge the travel distances involved and have provided detailed analysis of this in this report.

- e) "Currently 10 kids from Tukurumuri are attending other schools"

Board comment:

There are currently seven such children. Their personal reasons for doing so cannot reflect negatively on Tukurumuri School. Four of these have at least one parent working in Martinborough, and two are Year 8 students, who would be leaving Tukurumuri School at the end of this year anyway.

S9(2)(a) OIA



All the children currently "bypassing" the School live close to it, so Martinborough is a viable option. This is not the case for those living at or towards the coast.

Response:

We have provided updated detail of the 18 primary-aged students as at the 1 March 2018 roll return in the catchment and where they were enrolled, in this report.

- 8 Other arguments raised were as follows:

- a) There is only one parent representative vacancy on the Board of Trustees. The Board would have addressed this by now if it had not been told to hold off while closure is being considered.

Response:

At the time of the first report, the NZ School Trustees Association confirmed there were two vacancies. We acknowledge that, with a current roll of eight, the School should be able to appoint the necessary number of parent representatives. However, we consider that the LSM would remain until the Board was able to govern the School effectively.

- b) The Ministry implies that people working in the area and sending their children to the School is not a sustainable long-term proposition. The Board asks "What is, then? Surely any town school ... depends on people living and working in the area and their kids attending local schools?"

Response:

Transience is higher in rural communities, and future roll levels are subject to consequent fluctuations. We understand that some people are being employed, specifically because they have children and others attracted through financial incentives. This approach is not good for any school.

- c) The claim in paragraph 14 that students are likely to move onto a full primary school is nonsensical when Tuturumuri School is a full primary school.

Response:

We acknowledge that this should have referenced secondary schooling only, although we note that one student goes to a Year 7 – 15 school in Masterton.

- d) The claim (paragraph 15) that some members of the community are actively working to bring families with children into the area and have done for some years is not a sustainable means of maintaining the roll is unsupported. Such initiatives go back over 30 years of fluctuating rolls. The Board asks “how else a small rural school is supposed to maintain its roll?”

Response:

We have discussed the various strategies used to maintain the School roll, historically and in future, in this report.

- e) The Board also question why you, in response to certain written Parliamentary questions, stated the Ministry had no information on those matters, yet the information was included in the Board’s original submissions. The Board believes either you did not receive the information or did not consider it.

Response:

Claims made by the Board are not necessarily confirmed fact. In that case they could not be used in a Written Parliamentary Question response as they would not constitute “information held by the Ministry”. Regarding the 24 children, the question asked was for this age range. We used Years 1 to 8 inclusive as it matched the School years. The area used was a 12 km circle around the School.

- f) There were pages missing from the copies of annexes to the submissions, and the Board believes that the drafter, and therefore you, had incomplete information. It does not accept that the scanning error addresses this adequately.

Response:

We have confirmed to the Board that you received the full version of the submission and appendices. The scans have been redone to ensure a correct electronic record and this has been forwarded to the Board.

- g) The Board raises the issue of private costs incurred should the School close, and that these are not included in the cost analysis. They consider there should be a full economic analysis to support your decision.

Response:

The cost analysis is not provided as a basis for closing, or not closing, the School. It is a standard costing provided for information purposes only.

- h) The Board quotes real estate agents as advising a likely 10% decrease in property values, and 50% decrease in likely buyers, if the School closes. This will impact both sale price, and borrowing capability due to reduced equity

Response:

This is speculative and is not a relevant consideration for the Minister of Education in determining as to whether or not a school should remain open.

- i) The Board believes that the SWDC will lose out on rates income as a result of reduced property values.

Response:

This is not necessarily accurate, as the SWDC will reapportion rates to achieve its required income. If Tukurumuri property values decrease, those property owners would pay less rates than if values remained as they are, other things being equal. This is also not a relevant consideration for the Minister of Education in determining as to whether or not a school should remain open.

- j) The Board quotes section 6 and 27 of the New Zealand Bill of Rights Act 1990 (BORA). Section 6 requires enactments to be interpreted consistently with BORA whenever possible.

Response:

It is unclear why it is being quoted, but to the extent it might be relevant the Ministry interprets the Education Act consistently with the BORA whenever possible. Section 27 relates to natural justice in decision making and the right to bring judicial review proceedings. We consider that natural justice requirements have been followed in this process and the Board retains the ability to seek judicial review.

- 9 The Board has previously argued that all children must have a reasonably convenient school they can attend, quoting the Education Act 1989, and that coastal residents will not have such access if the School is closed. However the quoted sections relate to development of enrolment schemes – they do not purport to establish blanket general rights of access.

Steering Group submission

- 10 The Steering Group repeated some of the points also made by the Board. We have not repeated these unless something further has been added. Other arguments raised were as follows.

- a) The Steering Group quotes Article 26 of 1948 Universal Declaration of Human Rights (the Declaration), which begins with:

(1) Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory.

The Steering Group proposes that closure of the School would constitute a breach of this right, and of the Minister's fiduciary duty to communities at large. Elsewhere the Steering Group raises fiduciary duty under Magna Carta and case law - *Mackenzie District Council v Electricorp*.

Response:

New Zealand education legislation is consistent with the values promoted in Article 26. The closure of an individual school does not affect this.

Only one section of Magna Carta is part of New Zealand law today. It relates to *habeas corpus* and the right to a fair trial.

The reference to fiduciary duty in *Mackenzie District Council v Electricorp* is in relation to Territorial Authorities applying a rating regime under legislation. The case is not relevant to the school closure process.

- b) The Steering Group provides details of parents who confirmed enrolments for 2018 in support of its claim that the Minister “defamed” the School by saying it had no enrolments at the beginning of 2018.

Response:

At the time of publication of the media release, there were no students attending the School. The Ministry defines enrolment as the child physically attending the School. Students might have pre-enrolled or signalled enrolment, but this appointment of an Emergency Staffing Principal was unable to be made until students were starting at school. We have prepared this report on the basis of the current, not past, situation.

Further Arguments

11. The Steering Group raises the following points;

- The Ministry’s first decision shows pre-determination by ignoring inconvenient facts and legal arguments (cites section (6) and (27) of the NZ Bill of Rights Act 1990. We have addressed this earlier in this report.)
 - Annex 2 displays a conscious refusal to accept the special needs of underpopulated rural communities.
 - The Ministry discouraged parents from enrolling children when the School was officially open.
 - Defamed: The Minister defamed the School by referring to it as “studentless” when there were four enrolments lodged, and refusing to apologise.
 - Refused to accept there are 102 houses in the district, not 32.
 - Belief that the Minister had not read its’ first submission.
 - The interim decision failed to comply with Hon Damien O’Connor’s “rural-proofing” policy (We have addressed this elsewhere in this report.) - refers to a fiduciary duty under Magna Carta and the Court of Appeal in *Electricorp v Mackenzie* (neither of which is applicable).
 - The Ministry talks about a “sustainable roll” yet says there is no minimum number of acceptable pupils. The Steering Group says this is absurd.
 - There are more pre-school children in the area than attend the play group – the report understates the number.
 - The former principal and acting Board Chair had lived in the area less than three years (and are therefore considered “transient”) and requested information about closure without reference to the community.
 - Letters from the SWDC and GWRC were ignored. (Note: they were in fact considered in preparing our report, but they made no substantive argument – they just supported retention of the School.
- a) The Steering Group proposes that closure of the School would not compare fairly with the treatment of other similar schools, citing the list of small schools it obtained via its official information request.

Response:

The official information provided confirms that a number of the small schools on the list are in fact in the closure process, at the request of their respective boards.

We also note that the former acting Board Chair should not be considered transient, owning property in the area.

At no point did the Ministry discourage any parents from enrolling children. We did request a meeting with the family of a potential enrolment to ensure they understood the situation the School was facing, but this meeting or enrolment did not eventuate.

12. The Steering Group cites the 60 minute maximum time a primary-aged child should spend on a school bus, and cites the time taken to travel from White Rock Station to Tukurumuri as in excess of 1 hour 26 minutes once pickups are allowed for.

Response:

This means that it would be impossible to provide a bus service from White Rock Station even to Tukurumuri within normal parameters – it is not clear how this point was intended to apply to the proposed closure.

- a) The Steering Group claims that for students to travel from Tora/ Te Awaiti to Martinborough School would significantly exceed the recommended maximum travel times (whereas the travel time to Tukurumuri School is within this maximum).

Response:

We acknowledge that quoted travel times (AA travel calculator) to Martinborough School will exceed the recommended maximum, although not excessively. We do note that the road to Martinborough is sealed, and travel time is given as approximately 30 min longer than the trip to Tukurumuri from the coast.

- b) The Steering Group also raises the issue of dangers on the roads from increased traffic.

Response:

The dangers apply regardless of which school the children attend. This is a matter for the SWDC. The Ministry cannot do anything about the road conditions, which apply to the unsealed roads leading to Tukurumuri, not the sealed road from Tukurumuri to Martinborough.

- c) The Steering Group raises the issue of flooding on the Tukurumuri-Martinborough road. We have addressed this elsewhere in this report.

13. The Steering Group raises economic issues also raised by the Board. It specifically makes projections about the economic value of 2000 stock units.

Response:

There is no evidence provided in support of the claim of an increase of 2000 stock units based on retaining the School. GWRC advises there is a move away from stock, toward converting marginal pasture land to regenerating manuka, providing approximately 1/3 income from Carbon Credits, 1/3 from honey, and 1/3 from traditional stock. We have addressed the issue of wider economic impact elsewhere in this report.

14. The Steering Group asserts that the reasons for seven (not 10) students bypassing the School include the historic quality of staff, for which the Ministry is seen as responsible.

Response:

We agree that historic staffing issues could be a factor in the School's current position. It is the Board, not the Ministry, which is responsible for engaging staff.

- a) The Steering Group points out that the Ministry's statement "Should the school close and if the local population does grow at some time in the future, we would look to consider the best options for schooling provision at that time" is "a useless promise and unlikely to happen if the school has closed and the buildings have been sold."

Response:

It is not current policy to put a school "into recess" or to retain property once a school is closed. Neither is it allowed for under current legislation. How to cater for a possible future upturn in population is a relevant matter for you to consider in making your decision on closure.

- b) The Steering Group notes that all SWDC growth projections are based on the 2013 census. It also asserts there are no vacant houses available for rental.

Response:

We accept the SWDC growth projections are based on the 2013 census. This is consistent with all other population projections used for network purposes. We note SWDC uses a company, forecast I.D. to provide revised projections that take into account a range of factors, including building consents and developments and we have used these figures as the most up to date available. We note their comment on the rental situation in the area.

- c) The Steering Group considers it biased of the Ministry to base its educational quality assertions on the 2013 ERO report when the 2015 ERO report returned the School to a 3 year review cycle.

Response:

The current report acknowledges the ERO 2015 report and the current provision at the School. We consider that the earlier report did also.

- d) The Steering Group challenges the statement that "[now] the school is not playing the role for the majority of families with school-aged children as it has previously" as "unsupported nonsense". It states that at all meetings Ministry staff have complimented the school community on the evident success of voluntary fund raising activities and on exceptionally well-maintained school and grounds.

Response:

We acknowledge the past community support for the School. However we are aware that its retention is not universally supported by the community, and many families already choose to enrol their children at other schools, in spite of travel distances. We consider we have provided a balanced view of the place the School now holds in the eyes of the community as a whole.

15. The Steering Group asks that your decision be delayed until all official information requests have been answered and the Ministry obtains external legal advice and shares it with the Tukurumuri community. It believes it has a strong case for Judicial Review, based on alleged errors in past statements and considerations.

Response:

As we have prepared this report based on the current situation and projections, and we consider the report fairly and objectively presents the range of views about the School, we are confident in the advice we have prepared and the processes followed.

Submission supporting closure

16. The primary arguments presented in the submission supporting closure relate to the costs of small schools and the educational opportunities available at these schools.

Response:

These arguments apply to all small rural schools, not just Tukurumuri School. The proposal is therefore a policy position contradicting current, publicly stated, policy.

17. The submission challenges the claims of widespread support. We discuss in this report the split in views within the community. The submission references a possible 190 submissions which seems to be based on the number of registered valuations in the area, this figure being quoted in the Steering Group report as having been provided by GWRC/SWDC.

Response:

This figure is unrelated to the number of residents as many properties do not have dwellings, or have holiday-only dwellings. Of the 28 submissions mentioned, not all were from within the Tukurumuri community.

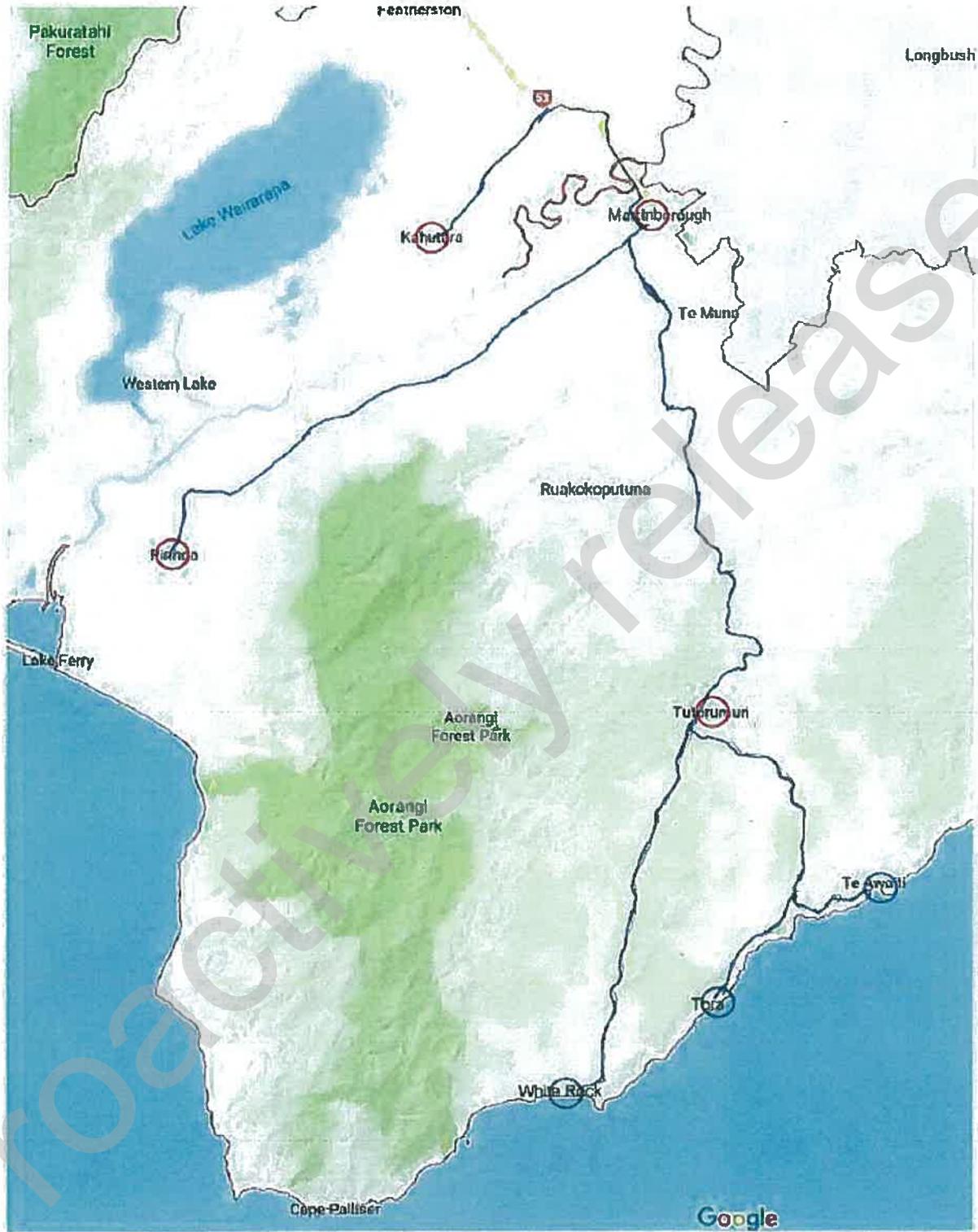
18. Regarding the population levels and transitory nature of farm workers discussed in the letter, we have considered these factors in preparing this report.

19. We have discussed the proposed development of residential sections at Tukurumuri also referred to in the letter.

20. We agree with the submission that possible property devaluation resulting from closure is an individual financial matter and irrelevant to the decision to be made.

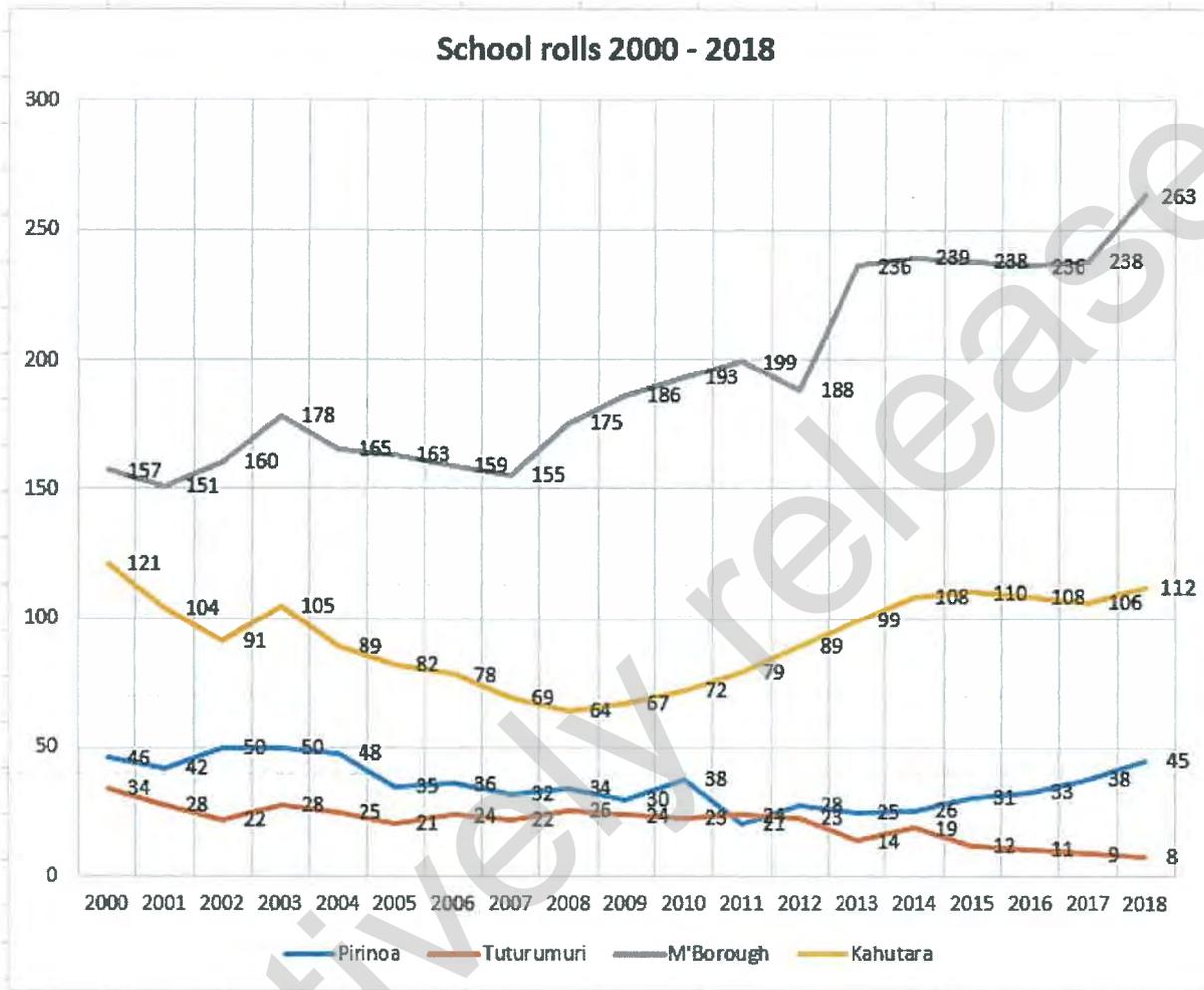
21. The Board and Steering Group maintain that the School is undergoing an intergenerational gap in enrolments, as has happened in the past. However, the sudden drop in roll in 2017 is elsewhere described in detail as due to short-term individual family circumstances, not a long-term intergenerational issue. Other discussion does raise the intergenerational issue of aging farming families whose offspring are reaching an age where they would potentially return to take over management of the family farm, while wanting to raise families of their own. The two scenarios are not mutually exclusive. The 2017 downturn appears to be a short-term anomaly precipitated by private circumstances, which might be against a medium-term background lull due to intergenerational factors.

Annex 3: Map of area and schools



Annex 4: School Rolls

Local school rolls 2000 to 2018. The 2018 roll for Tuturumuri School is shown as 8, being the number of current students.



Tuturumuri School roll 1973 to 2017



Annex 5: Rural proofing guidelines

Response from Minister O'Connor's Office:

The rural proofing guide is an endorsed, voluntary process that government departments should use to ensure that they build a rural lens into the full cycle of policy development, implementation and service delivery.

Rural proofing asks agencies to:

- Consider the unique drivers and challenges to rural communities (isolation, access to services, and primary industry reliance)
- Identify benefits and implications for rural communities
- Seek advice from relevant contacts and organisations
- Consider mitigation or innovative approaches
- Make adjustments
- Keep parties informed.

A scan of the media coverage of Tukurumuri School closure would suggest that the Ministry of Education has built consultation and working with the local rural community into this decision process, even if the outcome is not what some had hoped for.

Rural proofing isn't a test or auditing function as suggested in the reported speech.

Annex 8: Timeline and reactive Q&As

Timeline

1 March 2017	School roll was 9
Term 3, 2017	School roll had reduced to zero, due to a range of independent family events
1 September 2017	School's principal and acting Board chairperson enquired about options for the future of the School, including the process for closure (by letter)
	Board holds 3 community consultation meetings
8 December 2017	Ministry prepares briefing for Minister on the School's situation
10 December 2017	Board holds School open day. Seven community members form Steering Group to focus on attracting students and keeping the school open
11 December 2017	Independent report provided to Ministry
22 February 2018	Limited Statutory Manager appointed to assist Board due to vacancies
20 February 2018	Minister agrees to recommendation that consultation begin on possible closure
28 Feb – 28 March	Consultation period
31 May 2018	Consultation feedback provided to Minister
6 June 2018	Minister makes interim decision that School should close and gives Board 28 days to provide reasons why it should remain open
15 July 2018	Board given extension until 10 August for response
3 September 2018	Final report provided to Minister

General Q&As

What are the Ministry's criteria for closing small schools?

There is no specific roll size at which we would automatically close a school. We consider the school's sustainability in terms of a number of factors:

- Roll size, current and predicted
- Quality of teaching and learning
- Community support
- Ability to attract a suitable teaching principal
- Accessibility of education (including travel time)
- Whether the school is essential to the network
- Financial stability

Key points re wider issues include

- Being at school with only one or two other students (particularly when they may be your siblings) is not an ideal learning situation for many students.
- Students benefit from having peers who have diverse strengths and needs.
- Any decisions about infrastructure are based on the needs of individual students and the intent to support students to learn in their local communities, alongside their siblings and same age peers.

Transport

- The distance to Martinborough is 31.5 km one way and minimum drive time of 33 minutes one way. The time to get to Tukurumuri School will be additional and will depend on individual students' locations. The trip could be longer than published travel times once pick-up and drop-off times and speed on remote rural roads are considered.

Which other schools that we have recently closed – or are in the closure process?

Small schools that have recently been closed

- Lynton Downs School, near Kaikoura – closed 28 April 2017
- Ngamatea School, Whanganui office – closed 13 April 2017
- Hurleyville School, South Taranaki – closed 6 February 2017
- Aramoho School, Whanganui – closed 27 January 2017
- Cheltenham School, near Feilding – closed 27 January 2017
- St Joseph's School, Picton – closed 15 December 2017

Small schools in the closure process

Linton Country School (near Palmerston North) was being considered for closure towards the end of 2016. This was because the roll was likely to be zero for 2017. The school was retained when the community brought in more students (the 1 March 2017 roll was 3 students and the 1 July 2017 roll was 5).

Why was a Limited Statutory Manager (LSM) put into the School?

- The Board of Trustees at that time had two vacancies for parent representatives, and was unable to properly discharge its functions.
- A LSM was appointed to support in the Board on 22 February 2018.
- The LSM is responsible for the Board's employment powers, operations, management and communications.
- The LSM has also been working with the Board during the consultation process for possible closure.

Hon Chris Hipkins



MP for Rimutaka

Minister of Education

Minister of State Services

Leader of the House

Minister Responsible for Ministerial Services

17 SEP 2018

Kerstin Gruender
Chairperson
Tuturumuri School Board of Trustees
White Rock Road RD 2
Martinborough 5782

Dear Kerstin

Thank you for the Board's final submission regarding the proposal that Tuturumuri School should close. I acknowledge and appreciate the work that you have undertaken to ensure that the Board and Tuturumuri community have had the opportunity to consider, discuss and submit final comments as to why the School should remain open.

I have considered the final comments that you have provided to me, along with updated information about the School and its future prospects. I have also considered the impact that would result from closing the school on travel distances and times for local children to attend an alternative school.

In light of all the information I have received I have made a decision that Tuturumuri School should remain open during 2019, and accordingly I am ending the current closure process.

It will be crucial for the long-term sustainability of the School to attract a suitable teaching principal in 2019. I have instructed the Ministry of Education to provide me with an update about the ongoing sustainability of the School later in 2019, which will include advice on the upcoming Education Review Office report.

If you have any further questions, Erika Ross, Director of Education Wellington can be contacted by email: erika.ross@education.govt.nz and phone: [REDACTED]

S9(2)(a) OIA

Yours sincerely

A handwritten signature in blue ink, appearing to be 'CH', written over a large, faint 'Released' watermark.

Chris Hipkins
Minister of Education