



Education Report: Guidance for the school donations scheme

To:	Hon Chris Hipkins, Minister of Education		
Date:	27 August 2019	Priority:	High
Security Level:	In Confidence	METIS No:	1203727
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Messaging seen by Communications team:	No	Round Robin:	No

Purpose of Report

This report provides you with the final draft of the donations scheme guidance following a second round of consultation, and feedback from your office. This report seeks your agreement to send the guidance to schools as a basis for their decisions to opt in or out of the scheme.

Summary

1. The first version of the draft guidance documents was sent to you on 17 July 2019 (Metis 1198999 refers).
1. You asked us to conduct a final round of consultation before releasing the documents publicly. We have made some changes to the guidance in response to feedback received.
2. If you agree, we intend to release the final draft guidance on our website on Wednesday 4 September. This will be publicised in the School Bulletin, on social media, and will also be promoted by the Directors of Education and through other existing networks.
3. Schools must advise us that they have decided to opt in to the scheme by 14 November 2019 to receive the funding on 3 January 2020, as part of their first funding drop.
4. The draft guidance will be finalised once the Education (School Donations) Amendment Bill has been passed.

Recommended Actions

The Ministry of Education recommends you:

- a. **agree** that the draft guidance for school donations be published on Wednesday 4 September; and

Agree / Disagree

- b. **proactively release** this report once the Education (School Donations) Amendment Bill has been passed.

Release/Not release


Katrina Casey
Deputy Secretary
Sector Enablement and Support

27/8/2019


Hon Chris Hipkins
Minister of Education

28/8/19

Background

2. In June 2019, we prepared two sets of guidance:
 - Draft guidance for decile 1-7 schools and kura choosing to opt in to the Donations Scheme
 - Draft guidance for decile 8-10 schools and kura, and for those choosing not to opt in to the Donations Scheme.
3. In July, as a result of feedback from the sector working group and the regions, we created a third set of guidance for families/whanau.
4. We undertook consultation on the two sets of draft guidance to ensure they were clear, fit for purpose, and easily understood by schools, and presented drafts to you on 17 July (Metis 1198999 refers).

Final round of consultation

5. You asked us to undertake a final round of consultation with key sector leaders and groups before publication.
6. We made contact with the sector working group, asking them to review the updated guidance (see Annex i for a list of the peak bodies consulted). All participants apart from the Secondary Principals Association of New Zealand (SPANZ) and the School Business Managers' Association (SBMA) opted for providing feedback either by email or telephone. We received several emails with positive feedback to help refine the documentation.
7. On 7 August we met with a representative from SPANZ, and a representative from SBMA phoned in to the meeting to further clarify the guidance. Email feedback was accepted up to 18 August.

Specific feedback on the guidance documents

8. General feedback was that the draft guidance is clear and easy to engage with. Representatives appreciated that the guidance will provide clear and consistent information, making it easier for everyone to understand requirements around parents' payments to schools.
9. Themes arising in the feedback, and how we addressed these, are outlined below.

Theme	Feedback received	How this has been addressed
"Donation" vs "Charge" is not well understood, and nor is the exemption for school camps	<ul style="list-style-type: none">• The Office of the Auditor-General wanted it to be clear that schools shouldn't be asking senior students to pay "subject fees".• There was some confusion around whether the exemption for camps will allow schools to <i>charge</i> for camps, or to seek a <i>donation</i> for camps.• Some people asked whether Education Outside the Classroom (EOTC) is included in the camps exemption.	<ul style="list-style-type: none">• We have added in clarification that subject fees must not be charged.• We have clarified that "camps" include an overnight component. Further clarity will be provided once the exemption has been gazetted.• We have clarified that EOTC camps that have an

	<ul style="list-style-type: none"> There were questions around how we define school camps. This includes questions around what is a "trip" and what is a "camp". 	overnight component fall under the "camps" definition.
Comment at the bottom of parent's sheet	<ul style="list-style-type: none"> This was seen as repetitive and unnecessary. Others were concerned that saying parents could donate if they wished could create an expectation that they will do so. 	<ul style="list-style-type: none"> We have revised this wording in accordance with feedback.
Suggestions around presentation	<ul style="list-style-type: none"> A grid format is clearer. Simple, non-legalistic language and repetition should be minimised. All of the sheets should be aligned in terms of the order of examples. 	<ul style="list-style-type: none"> Information is now in a grid format. We have done a thorough review to minimise repetition and simplify language as much as possible. Examples have been re-ordered and now align across the different sheets.
Treatment of school ball tickets	<ul style="list-style-type: none"> School balls often cause issues for schools – we need to be clear that students must purchase a ticket for the ball – it is an optional activity. 	<ul style="list-style-type: none"> We have clarified wording around school balls, and have added a statement making it clear that students must purchase a ticket if they wish to attend the school ball.
Requirement to consult with communities	<ul style="list-style-type: none"> The requirement to consult with communities seems unnecessary – boards are elected by communities and are therefore representative. 	<ul style="list-style-type: none"> We have removed this requirement. The guidance now says school boards can consult as they deem appropriate.
Clarity around take-home components	<ul style="list-style-type: none"> Can schools ask students to decide whether they want to pay for a take-home component before they make an item? This would assist schools to manage their budgets. 	<ul style="list-style-type: none"> We have clarified that schools may ask families and whanau to decide whether to purchase an item when their student signs up for a course.

10. Preliminary feedback from your office was also received. In addition to suggestions for minor changes to further align the three pieces of guidance (we have changed these accordingly), our response to feedback is set out below.

Feedback received	How this has been addressed
Suggestion that we include an explanation of what state integrated schools actually are in family/whanau guidance, as this may not be well understood.	<ul style="list-style-type: none"> An explanation has been added.
We state that schools should not make a profit from school uniforms – doesn't this also apply to selling stationery?	<ul style="list-style-type: none"> We have repeated the expectation set out for uniforms – schools are not expected to make significant profits from the sale of stationery, though a small margin to cover the cost of sales is acceptable.
Addition of an 0800 number or email enquiries address	<ul style="list-style-type: none"> We have created an email address for enquiries – school.donations@education.govt.nz. This has been included in each of the sets of guidance.

11. The final draft guidance has been reviewed by our Legal team. They requested we remove the reference to insurance in the miscellaneous sections of the two sets of guidance for schools, as there are few, if any, situations where boards could legally be collecting funds for insurances. We have removed this reference accordingly.

Final draft guidance for the school donations scheme

12. The final draft guidance is attached as Annex ii.
13. The final draft guidance has been updated in accordance with the feedback received during this final consultation. We have also clarified where schools opting in to the donations scheme can and cannot ask for donations.

Next steps

14. If you agree, we plan to publish the draft guidance on our website on Wednesday 4 September 2019.
15. We will be publicising the guidance for schools in a special edition of the School Bulletin and through the Directors of Education networks. We will publicise the families and whānau guidance by sharing this with our colleagues at other government departments, sector parent networks, and publicising on social media.
16. We will be publishing translations of the parent's guidance in a range of languages in the next couple of weeks. The school guidance will be published in English, Te Reo Māori and New Zealand Sign Language. Translated versions will be added to our website in the fortnight following publication.
17. Decile 1-7 schools and kura will need to notify us by 14 November 2019, through an online form if they are opting in to the Donations scheme for the 2020 school year. Decile 1-7 schools and kura that choose not to participate will not need to take any action.
18. The guidance will remain draft until the Bill has been passed. When the Bill passes, we will update the guidance with the final requirements.

Proactive release

19. We recommend that this briefing is proactively released once the Education (School Donations) Amendment Bill has been passed and the guidance has been finalised. Any information that might need to be withheld will be redacted in accordance with the provision of the Official Information Act 1982.

Annex

Annex i: List of peak bodies for second round of consultation

Annex ii: Final draft guidance

Annex i: List of peak bodies for second round of consultation

The table below shows peak bodies we consulted with, and indicates whether they responded.

Organisation	Response?
Association of Proprietors of Integrated Schools	Yes
Equity Sector Reference Group	Yes
School Business Managers' Association	Yes
Ngā Kura a Iwi	No response
New Zealand Association of Intermediate and Middle Schools	Yes
New Zealand Area Schools Association	No further feedback
New Zealand Educational Institute	Yes
New Zealand Principals' Federation	No response
Office of the Auditor-General	Yes
New Zealand School Trustees Association	Yes
Post Primary Teachers' Association	No response
Special Education Principals' Association of New Zealand	Yes
Secondary Principals' Association of New Zealand	Yes
Te Rūnanga Nui o ngā Kura Kaupapa Māori o Aotearoa	No further feedback
New Zealand Parent Teacher Association National Executive	No further feedback

Annex ii: Final draft guidance

Final draft Donations Scheme documents:

- What families/whānau need to know about school/kura donations
- Draft Guidance for Boards of Trustees of Decile 1-7 Schools and Kura Choosing to Opt in to the Donations Scheme
- Draft Guidance for Decile 8-10 Schools/Kura, and Schools/Kura Not Opting in to the Donations Scheme.