



## Education Report: Approval for State schools to provide education to students outside NZ during Covid-19

<b>To:</b>	Hon Chris Hipkins, Minister of Education		
<b>Date:</b>	26 November 2020	<b>Priority:</b>	High
<b>Security Level:</b>	In Confidence	<b>METIS No:</b>	1239346
<b>Drafter:</b>	Miriam Pierard	<b>DDI:</b>	9(2)(a)
<b>Key contact:</b>	Ben O'Meara	<b>DDI:</b>	463 8704
<b>Messaging seen by Communications team:</b>	N/A	<b>Round robin:</b>	No

### Purpose of report

This paper:

- **seeks** your approval for eight schools to temporarily provide education to eligible students outside New Zealand, as provided for in Schedule 1, section 11 of the Education and Training Act 2020 (the Act);
- **provides** information on some of the activities and students schools have asked about that are outside the provisions in the Act.

### Summary

1. The Ministry and NZQA have assessed 13 applications from schools to temporarily provide education and/or NCEA to students outside New Zealand:
  - a. Three of these are from schools that do not require your approval to provide education offshore.
  - b. We are seeking further information from two schools before we make a recommendation.
  - c. We consider that the eight remaining schools meet the approved criteria.
2. We recommend that you approve these eight schools in accordance with Schedule 1, Section 11 of the Education and Training Act 2020.

### Recommended Actions

The Ministry of Education recommends that you:

- a. **note** that Ministry of Education officials and NZQA have assessed 13 applications from schools for their capacity and capability to deliver education offshore

**Noted**

- b. **note** that of these, NZQA has approved three schools to temporarily provide NCEA outside New Zealand. These three schools are private schools and do not require your approval to provide education outside New Zealand
- Noted**
- c. **note** that the Ministry is seeking more information from two schools: Mount Aspiring College and Tauranga Boys' College
- Noted**
- d. **note** that the Ministry considers the remaining eight schools meet the approved criteria for providing education to students based offshore
- Noted**
- e. **agree** to approve the eight State and State integrated schools in the table below to temporarily provide education to their eligible students outside New Zealand, in accordance with Schedule 1, clause 11 of the Education and Training Act 2020:

Hobsonville Point Secondary School	<b>Agree</b> / Disagree
Howick College	<b>Agree</b> / Disagree
Liston College	<b>Agree</b> / Disagree
Rathkeale College	<b>Agree</b> / Disagree
St Dominic's Catholic College	<b>Agree</b> / Disagree
Wainuiomata High School	<b>Agree</b> / Disagree
Westlake Boys High School	<b>Agree</b> / Disagree
Whangamatā Area School	<b>Agree</b> / Disagree

- f. **note** that NZQA has provisionally approved seven of the schools in paragraph e above to provide NCEA to students outside New Zealand, subject to your approval. NZQA has not yet informed these schools of its decision and will do so following your decision on approval

**Noted**

### Proactive release

- g. **agree** that this Education Report is proactively released as part of the next publication.

**Agree** / Disagree

Ben O'Meara  
Group Manager  
Education System Policy

26/11/2020



Hon Chris Hipkins  
Minister of Education

28/11/2020

## Background

1. In response to the Covid-19 pandemic, you have temporary power under the Education and Training Act 2020 (the Act) to approve State and State-integrated schools to provide education to eligible students outside New Zealand (Schedule 1, clause 11). To be eligible, students must have been enrolled at the school on or before 3 July 2020.
2. NZQA has temporary power under the Act (Schedule 1, clause 12) to approve registered (including private) schools to provide NCEA to eligible students in accordance with their Rules. Private schools do not require your approval to provide education offshore.
3. These provisions expire on 31 December 2022.

## Criteria for offering education offshore

4. You have approved the following criteria for considering State and State-integrated schools' applications to provide education to students outside New Zealand (refer METIS 1240810):
  - a. Students are eligible and have a 2020 enrolment with the school on or before 3 July.
  - b. The school has the capability to provide suitable and quality distance learning and assessment to students outside NZ.
  - c. The school has the capability to provide suitable information and support for learning and wellbeing to students outside NZ.

## Overview of applications

5. The Ministry and NZQA have created a joint application process, which went live on 14 September. The Ministry is the central collection point and passes relevant applications to NZQA for their review and approval.
6. As at 2 November, the Ministry and NZQA have received 13 applications:

School Number	School Name	Ministry Approval Status	NZQA approval Status
6977	Hobsonville Point Secondary School	Recommend approval	Not Applicable
87	Howick College	Recommend approval	Provisionally Approved*
46	Liston College	Recommend approval	Provisionally Approved*
245	Rathkeale College	Recommend approval	Provisionally Approved*
47	St Dominic's Catholic College (Henderson)	Recommend approval	Provisionally Approved*
478	Wainuiomata High School	Recommend approval	Provisionally Approved*
37	Westlake Boys' High School	Recommend approval	Provisionally Approved*
428	Whangamatā Area School	Recommend approval	Provisionally Approved*
533	Mount Aspiring College	Seeking more information	

121	Tauranga Boys' College	Seeking more information	
68	St Cuthbert's College	Not Applicable	Approved
141	St Peter's School (Cambridge)	Not Applicable	Approved
498	Te Aho o Te Kura Pounamu	Not Applicable	Approved

*\*NZQA has provisionally approved, pending your approval to deliver education offshore.*

7. The Ministry has assessed each of the schools against the approved criteria. Officials considered the information provided by the schools, Ministry enrolment information, and regional information about the schools' capacity and capability in order to determine whether the schools met the criteria.
8. The information provided by schools was assessed by a panel of Ministry officials. In addition to checking the eligibility of the individual students concerned, and information relating to the other criteria, the panel considered the suitability of the proposed learning programmes for distance provision and the arrangements for pastoral care of the students concerned. The panel also sought comment from the Ministry's regional offices on all applications.
9. In several instances the panel went back to schools to request additional information to complete the school's application, such as to confirm the eligibility of students, or that the school had the capacity and capability to deliver education overseas. For example, the panel asked:
  - a. For copies of signed enrolment contracts where students were not entered on the ENROL system;
  - b. About the specific consultation held with teaching staff to ensure staff had appropriate opportunities to raise concerns about delivering to students overseas;
  - c. How some learning programmes, for example, catering and painting, had been adjusted to be suitable for distance provision, while ensuring authenticity of students' own work;
  - d. How the provision of pastoral care would be done via distance, e.g. accessing guidance counsellors via zoom rather than face-to-face.
10. Annex 1 provides summary examples of school applications and their review process. The summary includes the applications from two schools and shows the follow up information the Ministry sought before the applications could be recommended for approval. This is indicative of the process followed with all applications.
11. We recommend approving the following eight schools: Hobsonville Point Secondary School; Howick College; Liston College; Rathkeale College; St Dominic's Catholic College (Henderson); Wainuiomata High School; Westlake Boys' High School and Whangamatā Area School. These schools have demonstrated they have eligible students, and the capacity and capability to deliver education offshore.
12. We are seeking additional information from Mount Aspiring College and Tauranga Boys' College before making a recommendation.

13. NZQA has approved three schools to temporarily provide NCEA that do not require your approval to provide education outside New Zealand.
14. At present, 53 students will be receiving education and NCEA through these arrangements. These numbers are expected to fluctuate as more students return to their home countries, and others end their enrolments with New Zealand schools. The Ministry and NZQA, as appropriate, will confirm with schools the eligibility of individual students as this happens.

### **Schools recommended for your approval**

15. Hobsonville Point Secondary School is a decile 10, co-ed, State secondary (Year 9-15) school based in Auckland. The school had a 1 July roll of 689 students, with 26 international students.
16. Howick College is a decile 8, co-ed, State secondary (Year 9-15) school based in Auckland. The school had a 1 July roll of 2,099 students, with 86 international students. Howick College has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
17. Liston College is a decile 5, single sex (boys), State integrated secondary (Year 7-15) school based in Auckland. The school had a 1 July roll of 839, with 22 international students. Liston College has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
18. Rathkeale College is a decile 9, single sex (boys), State integrated, secondary (Year 9-15) school based in Wairarapa. The school had a 1 July a roll of 331 students, with 19 international students. Rathkeale College has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
19. St Dominic's Catholic College (Henderson) is a decile 5, single sex (girls), State integrated, secondary (Year 7-15) school based in Auckland. The school had a 1 July roll of 838 students, with 23 international students. St Dominic's Catholic College has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
20. Wainuiomata High School is a decile 3, co-ed, State secondary (Year 9-15) school based in Lower Hutt. The school had a 1 July roll of 591 students, with 17 international students. Wainuiomata High has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
21. Westlake Boys' High School is a decile 9, single sex (boys), State secondary (Year 9-15) school based in Auckland. The school has a roll of 2,357 students, with 150 international students. Westlake Boys' High has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.
22. Whangamatā Area School is a decile 4, co-ed, State composite (Year 1-15) school based in the Waikato region. The school has a roll of 541 students, with six international students. Whangamatā Area School has been provisionally approved by NZQA to deliver NCEA offshore, subject to your approval for them to deliver education offshore.

### **Additional schools approved by NZQA**

23. Three schools have been approved by NZQA to deliver NCEA offshore. Two of these, St Cuthbert's College and St Peter's School (Cambridge), are private schools and do not require your approval to deliver education offshore.
24. One school, Te Aho o Te Kura Pounamu, also does not require your approval as it is already able to provide education to students outside New Zealand through the fee-paying dual-tuition enrolment gateway under the Education and Training Act 2020.
25. St Cuthbert's College (Epsom) is a decile 10, single sex (girls), private composite (Year 1-15) school based in Auckland. The school had a 1 July roll of 1,433 students, with 54 international students. St Cuthbert's College has been approved by NZQA to deliver NCEA offshore.
26. St Peter's School (Cambridge) is a decile 9, co-ed, private secondary (Year 7-15) school based in Cambridge. The school had a 1 July roll of 1,172 students, with 64 international students. St Peter's (Cambridge) has been approved to deliver NCEA offshore.
27. Te Aho o Te Kura Pounamu is a co-ed, State distance school covering all of New Zealand. The school had a 1 July roll of 6,800 full-time students. Te Kura has been approved by NZQA to deliver NCEA offshore.

### **Additional Issues raised by schools**

---

28. Schools' enquiries about delivering education and/or NCEA offshore have included some instances where schools are seeking to provide education that falls outside the scope of the temporary COVID response. These are set out below, for your information.

### **Individual Student Eligibility**

29. Two schools – Te Aho o Te Kura Pounamu and Hobsonville Point Secondary School - included students in their application who do not meet the requirement for students to have been enrolled with their NZ school on or before 3 July 2020. The Ministry will explain to these schools why these students are not eligible.

### **Broader Student Eligibility**

30. The Schools International Education Business Association (SIEBA) and some individual schools have suggested the Government expand this temporary Covid-19 response policy to include new international students in order to support the international education sector.
31. The exceptions provided for are time limited and only available to students already enrolled in schools for 2020. This is intended to allow affected students who are studying NCEA to continue that pathway, while preventing any new provision of NCEA offshore. Any provision of education or NCEA outside of these exceptions would require a change to legislation.
32. The Ministry is using the following key messages to respond:
  - a. There is no intention at present to further increase the provision of education offshore.

- b. The Government recognises the severity of the impact Covid-19 and border closures have had on the international education sector and schools that host and educate international students.
- c. For this reason, the international recovery plan provides \$20m in transition funding for state and state integrated schools that have lost international student revenue this year.

### **Broader provision of education**

- 33. The Ministry met with SIEBA to discuss the fact that State and State integrated schools are not able to provide education outside New Zealand, outside the limited circumstances provided for in response to the pandemic. This discussion, and some of the queries we've received, suggest that some schools may be providing forms of education offshore outside the exceptions – and may have been doing this for some time. The Ministry is preparing guidance to make it clear where these practices are not permitted under legislation.
- 34. In addition, several State and State integrated schools have requested they be allowed to provide 'taster' cultural exchange and English Language courses to students outside New Zealand who are not enrolled with them. This would involve the provision of resources, activities and video calls. Some schools indicated they would request a fee for this. They have argued that this allows them to develop or maintain relationships with prospective students that may wish to come to New Zealand in the future.
- 35. The Ministry considers these programmes to be provision of education and that State and State integrated schools are not able to offer this outside New Zealand. These requests are outside the scope of this temporary policy as the students were not enrolled with the school on or before 3 July 2020. However, schools are welcome to remain in communication with prospective international students offshore as this would not be an exchange of services or resources.

### **Next Steps**

---

- 36. We will provide a copy of this Education Report to NZQA to confirm your approval of the schools listed in recommendation (e) above to provide education outside New Zealand. This will meet Criterion 1 of the NZQA rules: *"State schools must have obtained Ministerial approval under clause 11 of Schedule 1 of the Act"*, and NZQA can then approve those schools to provide NCEA outside New Zealand.
- 37. The Ministry will notify the eight recommended State and State integrated schools of your approval for their provision of education to eligible students outside New Zealand.
- 38. The Ministry and NZQA, as appropriate, will confirm with the approved schools which students meet the enrolment eligibility criteria.

### **Annexes**

---

Annex 1: Summary examples of school applications and their review process

## Annex 1: Summary examples of school applications and their review process

---

### **Rathkeale College**

#### *Initial assessment*

- Students were confirmed as enrolled at Rathkeale College on or before 3 July 2020.
- Application showed NCEA level 1 was to be delivered but the school did not seek approval from NZQA.
- Regional staff were confident that the school has the capability, capacity and Information and Communications Technology (ICT) systems to deliver distance learning and NCEA to the student mentioned in the application.
- Staff were consulted, however it was unclear if the teachers had had an opportunity to raise concerns and if there were concerns if they had been addressed appropriately.
- Teachers were engaged with the student, however it was unclear how the college would ensure the authenticity of the student's own work
- Onsite supports were available to the student as well as resources, however it was unclear if that support was available while the student was offshore.

#### *The Ministry followed up with the school and confirmed:*

- The school did want to seek NZQA approval and this was discussed further with NZQA.
- Teachers had not raised any issues in consultation and that staff were 'very happy to continue to provide ongoing educational support, teaching, work and marking as appropriate'.
- The student's work that contained a significant amount of written text was likely to be run through the Turnitin programme which checks for plagiarism.
- The student had ample distance supports available in their teachers, the school dean and fellow students via email and Microsoft Teams.

### **Wainuiomata High School**

#### *Initial assessment*

- The seven students were confirmed as enrolled at Wainuiomata High School on or before 3 July 2020.
- Regional staff noted no concerns about Wainuiomata High School's capacity and capability of staffing, ICT systems, and suitability of teaching and learning for distance, and for NCEA – suitability of standards, assessment and moderation procedures.
- The school noted that the courses listed for each student were suitable for offshore delivery, however it was unclear how the catering course was adapted for offshore delivery.
- The school listed onsite supports available to the student as well as resources, however it was unclear what resources and supports would be available to the student while they are offshore.

#### *The Ministry followed up with the school and confirmed:*

- Staff had considered remote delivery of their courses, for example the catering course - the offshore student is given a recipe for a cooking session in advance, and would participate in the local student's group to interact and cook together through an i-pad Zoom call. The teacher would then follow up one on one with the student in the next lesson through a one on one conversation and report on progress, concerns, questions and issues that the student may have.



- Students had a 40-minute conference session facilitated by the International Dean and International Student Manager. The school guidance councillor would be consulted if the student required further support for their wellbeing. Language support was available from International staff members to ensure clear communication too.

Proactively Released