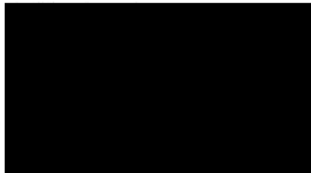




24 AUG 2018



Thank you for your email of 30 July 2018 to the Ministry of Education requesting the following information:

<http://www.education.govt.nz/ministry-of-education/specific-initiatives/health-and-safety/practice-framework-resources-for-health-and-safety/guidelines-for-schools-to-develop-or-review-a-firearms-policy/>

Please supply the public submissions made during this process.

Your request has been considered under the Official Information Act 1982 (the Act).

I am releasing to you the 108 public submissions that we received during the consultation period of 5 March to 11 April 2018. I am withholding names and contact details of individual submitters that did not consent to have their names released under section 9(2)(a) of the Act, to protect the privacy of natural persons.

Where information has been withheld under section 9(2) I have considered, as required under section 9(1) of the Act, the public interest considerations favouring its release. I have identified no public interest considerations which outweigh the need to withhold information at this time.

Please note, the Ministry now proactively publishes OIA responses on our website. As such, we may publish this response on our website after five working days. Your name and contact details will be removed.

Thank you again for your email. You have the right to ask an Ombudsman to review this decision. You can do this by writing to info@ombudsman.parliament.nz or Office of the Ombudsman, PO Box 10152, Wellington 6143.

Yours sincerely

Susan Howan
Acting Deputy Secretary
Sector Enablement and Support

From:
To: Health & Safety Info
Subject: Sub 1 - Guidelines draft for firearms at Schools
Date: Monday, 5 March 2018 1:26:13 p.m.

I believe I can speak for other firearm license holders as well when I say that this draft is pretty much bang on the money. The guidelines for immediate supervision, allowing A Cat firearms on school grounds for serious sporting purposes and letting the individual schools choose the finer details are all perfect ideas.

P.S

If any school around the Wairarapa or Wellington areas wanted to start a shooting club or wanted to talk to a plethora of firearm license holders for advice I'm certain the excellent people at the Wairarapa pistol sports shooting club would be happy to assist.

Cheers

From:
To: Health & Safety Info
Subject: Sub 2 -
Date: Monday, 5 March 2018 1:35:39 p.m.

I vote yes to guns in schools. Everybody teaching shooting has been police checked for a firearms licence, has vast knowledge of firearms unlike you and your staff. Kids have to learn a subject in a good healthy environment

From:
To: Health & Safety Info
Subject: Sub 3 - Firearms feedback
Date: Monday, 5 March 2018 2:31:54 p.m.

I applaud a proper national approach .As a former school cadet and ATC member, I benefited from and greatly valued my firearms training.
As a lifelong hunter :fisherman :target shooter,I regard such outdoor activities a proper part of the NZ education system

From:
To: [Health & Safety Info](#)
Subject: Sub 4 - Guns and School Learning about Firearms
Date: Monday, 5 March 2018 2:50:06 p.m.

1) As a 1961 to 1965 high school student at Shirley Boys High School in Christchurch

- we had cadets with disabled .303 rifles, disabled Bren Guns and artillery pieces on school grounds and where so ever the Army chose to move us.

- we shot many hundreds of .22 rounds on the school range at the school itself as a cadet. I also shot in the school shooting team at the school itself. For this I was a Range Warden in my later school years.

- we shot hundreds of .303 rounds at West Melton under Army supervision as part of cadets. I also shot these as part of the school shooting team.

- we all shot a Bren Gun at Burnham under Army supervision.

- selected students shot Sterling Submachine Guns under Army supervision off the school site at Burnham.

2) I was not subsequently drafted to the army but I have kept my shooting interests alive into my old age.

3) Please don't let new restrictions prevent the Army and/or others from teaching gun safety at schools.

Sent from my iPhone

From:
To: [Health & Safety Info](#)
Subject: Sub 5 - Draft Firearms policy for schools
Date: Monday, 5 March 2018 11:04:01 p.m.

Kia Ora,

Firearm safety trainings with the police are an important part of children's education in NZ, in particular in rural areas. However, weapons designed for other things than hunting/pest control are not an essential part of this lifestyle and Military Style Semiautomatic Weapons (MSSA, page 8 in draft) should not be allowed in schools at all. Please do not allow any weapons that are designed for combat (aka killing another human) in schools! My family has a long history in the armed forces and we were always very clear of what these weapons were designed for and this helped us to keep a healthy respect for them. Even displaying them in schools without explaining their real purpose will dilute this message.

Kind regards,

From:
To: [Health & Safety Info](#)
Subject: Sub 6 - Consultation on draft guidelines for schools developing a firearms policy
Date: Monday, 5 March 2018 9:17:31 p.m.

regarding the above consultation, i would like to submit the below comments.

Please note, as background,

- i am a parent of 4 grown children,
- served as BOT Chairperson for 5 years for our local primary school
- am a member of several shooting clubs including being secretary of a local pistol club, which has junior members and has hosted local cubs/scouts groups
- Am the owner of a hunting/outdoors store

I see the guidelines as logical, thought out and well presented. They present a logical unbiased approach to a subject that unfortunately usually brings more heat than light, and just as often is debated with a lot of assumptions and false facts.

By presenting the current Firearms laws, you have set the ground rules, and all shooting clubs and users would agree with you. I also fully support your stance on "We do not support the unsupervised access of firearms in schools" which again is consistent with NZ law and would be supported by all law-abiding firearms users and groups.

There are only two areas i would suggest changes to

1) *Auctions involving firearms (The dealer must have the correct licences and endorsements for the type of firearm.) - A school staff member who is a firearms licence holder needs to sight the dealer's firearms licence (Local Arms Officer can help with this).*

I cannot see a reason for this, as under NZ law the auction must be operated by someone holding a dealer's license, and this already has requirements around ensuring sellers and buyers have current firearms licenses and details of the transactions are recorded (just as they have to be if the transaction took place in a gunshop or online).

In addition often a police Arms officer is present to help with any legal paperwork that is required to be completed to ensure smooth and legal transactions take place.

To suggest or imply that the school needs to have a staff member with a firearms license present serves no purpose for an activity that is outside of their employment and is likely to just be a business or local club hiring their school hall

2) *Sponsorship - What does the school allow in terms of sponsorship by businesses/ organisations involving firearms.*

We provide sponsorship to many schools, kindergartens and play centres, by supplying goods for fundraising. Our business, like most that deal in firearms, also sell tramping, camping and fishing equipment, and outdoor clothing.

I understand you have put this in as a thought provoker to school boards in creating policy, but it needs to be seen in context with the NZ tradition of the great outdoors

In closing, it's important to understand that research undertaken worldwide shows that children that are shown the correct and safe handling of firearms have a better

understanding of the implications of mishandling them.and have far less risk of missuse or sundsafe use of them.

It has to be remembered NZ has far different laws that US, and a completely different culture to them.

From:
To: [Health & Safety Info](#)
Subject: Sub 7 - Firearms in Schools
Date: Monday, 5 March 2018 9:03:52 p.m.

Firearms in schools are perfectly acceptable so long as they are stored or handled correctly under qualified supervision.

Kind regards

From:
To: Health & Safety Info
Subject: Sub 8 - Firearms in school
Date: Monday, 5 March 2018 8:40:03 p.m.

It is my opinion that you are going in the opposite direction to what would be helpful for many young children growing up.

I'm 68 years old and have owned and hunted with firearms since the age of 16.

I was much younger when my father first took me hunting in the Wairarapa.

Knowledge of firearms takes away the fear and wanting to find out about them in unhealthy ways.

I have two children both have grown up in a home with firearms present, an early introduction to firearms took away their curiosity, my daughter has never had any interest and my son didn't enjoy killing animals, he is now a practicing GP.

Both of his sons, aged 3&4 have been to the range with us and fired my .22 under our guidance.

Sweeping these things under the carpet is plain dumb in my opinion, let them learn what firearms are and how they work, take away the mystery, many will reject them, others will embrace, as I did, a hobby that has taught me much, introduced me to some fantastic people along the way and given me many skills.

I will ensure all of my grandchildren will have the opportunity to learn about firearms and hunting, without pressure, and I know it will be better they grow up with that knowledge and not curiosity.

Sent from my iPhone,

From:
To: [Health & Safety Info](#)
Subject: Sub 9 - Health and safety point
Date: Monday, 5 March 2018 8:38:18 p.m.

Dear Education department

As a father that has had a child attend Wellington High School and was a member of the shooting team I feel that my suggestion may hold merit.

I would like to see any firearm that is to be used by our children at school under supervision of the school have their firearms checked and tested for correct operation from a certified gunsmith/armourist on a regular basis much like you have a car get a warrant of fitness.

This should be logged and noted on official documentation and submitted to a regulatory board or member for inspection. Records to be kept and held for the life of the firearms.

There should also be spot check visits conducted on security and the fitness of the firearms.

This should also be applicable for anyone bringing a firearm to an event for use with students.

This will help prevent accidents with faulty equipment.

Safety safety safety

I would also like to add that the draft looks fantastic and I would love to see more children get involved in my sport.

My son loved it and enjoyed the concentration and sense of achievement from the sport. Shooting can be very rewarding to an individual.

Thanks

From:
To: Health & Safety Info
Subject: Sub 10 - Firearms in Schools feedback
Date: Monday, 5 March 2018 8:20:18 p.m.

Good Evening, First off I am a Firearm's owner and the following are that of a Parent of school aged children, A community member, and a member of a local Clay target club.

My Thoughts are the following

1. Firearms in schools should be and only be allowed under strict supervision of the law enforcement officer, Army or other respected club/organisation.
2. All Firearm's that enter the school ground's shall have the bolt removed where possible and that any Semi-automatic shall have a bolt tag in place as to not allow the bolt to slide and shut.
3. No live ammuniton shall be allowed on school grounds.

I think and feel that teaching about and showing children around firearms will improve not only firearm safety and knowledge but reduce the stigma there is about them and make them understand that like everything else it is not the item/weapon used that is dangerous but the person behind the it making it threatening.

This will also help close the gap between what is the norm in rural life of New Zealand and what is not in the towns and cities of New Zealand.

Thank you

From:
To: [Health & Safety Info](#)
Subject: Sub 11 - Firearms in schools
Date: Monday, 5 March 2018 8:05:22 p.m.

I feel it's very important that firearm safety and appreciation be taught in schools.
Better educated our children are around the safe handling of firearms the better informed they will be.
I wish my child to receive education in the correct use of firearms and safety.

Sent from my Samsung Galaxy smartphone.

From:
To: Health & Safety Info
Subject: Sub 12 - School fire arms and education
Date: Monday, 5 March 2018 6:37:01 p.m.

To whom it concerns,

I would like to submit a no to the banning of rifles and more importantly fire arm education. I am a firm believer that like boxing and martial arts for example, individuals who have been shown how to appropriately defend them selves do everything that they can to diffuse a negative or aggressive situation. I also believe that the more younger people have involvement with the right professional or group they can channel there passion into a potential career or passionate hobby. We have incredible gun stability in this nation and a thorough gun license application in society. I really enjoyed the process, while it was difficult to attain with a busy work/life balance it made me really focus on achieving goals and pursuing this as a hobby. I also really enjoyed the involvement of my wife into the process which assured her of the laws and accountability I had to achieve to attain a rifle. I am now currently in the process of attaining my Pistol license. I am proud of the fact that with purseverence and commitment you can achieve the freedom of having an amazing rifle collection while still having checks and balances for example having to attend multiple club attendees and getting the pistol club to give the green light with senior peers is simple and yet genius as it puts the responsibility squarely on the shoulders of the club group as a whole. I also feel that the hunting community is one of the greatest assets of holding the torch of conservation alive in this country. Finally i think that a large part of fear mongering has obscured the general public's perception of fire arms in this nation please take the time to remove the click bait articles and look at the bigger picture of education on all topic matters regardless it be a rifle, pistol, the planets, life, death etc the more opportunity our society has to learn the broader spectrum attained to be open to educated answers in stead of tribalism and fear mongering.

Thank you for your time.

Sent from my iPhone

From:
To: [Health & Safety Info](#)
Subject: Sub 13 - Firearms in Schools
Date: Monday, 5 March 2018 6:20:58 p.m.

To Whom it may concern,

As a firearms license holder I do not see any reason to stop having responsible exposure to firearms at school. Whether via our military or clay pigeon clubs or small bore rifle clubs or licensed parents wanting to share their knowledge with willing students. All controlled and responsible situations and exposure. Not only the students but it could even be opened up to parents of students that were not brought up with firearms so they can learn and make informed decisions and consents.

If a licensed person is one on one with an unlicensed person explaining and teaching about the firearms then that is 100% positive. And that is the current law too.

This is a positive environment. Not like the common video games where these students are shooting all manner of things and people. Once killed they can then just hit reset and start again, not consequences. Real life understanding of these tools needs to be had.

They are valuable tools to providing food for many tables around NZ, for controlling noxious pests, and also good sporting competitions on the range.

My children are and will continue to be taught and exposed to firearms along with any of their friends that first gain permission and understanding from their parents as that is the only way to properly understand the tool and to also have a balanced understanding from the many biased negative narrative from the media not only nationally but internationally.

Firearms don't kill people, people kill people.

Regards

Responsible, Police approved firearm owner for over 20 years.

From:
To: Health & Safety Info
Subject: Sub 14 and 16 Consultation on draft guidelines for schools developing a firearms policy
Date: Monday, 5 March 2018 5:01:16 p.m.

Dear sir/madam,

Having read through the draft guidelines for schools developing a firearms policy, I think it is actually a reasonably well thought out document.

Aside from a couple of grammatical errors to tidy up there is not much I see fit to change, apart from perhaps adding a comment in the introduction cautioning school boards to think carefully about the limitations they might impose on their students' education and the school's role in the community if they decide to impose a ban on firearms from their school and elect to adopt no policy governing the use of firearms at their school.

Regards

From:
To: [Health & Safety Info](#)
Subject: Sub 15 - Feedback School Guns
Date: Tuesday, 6 March 2018 9:27:52 a.m.

Thousands of kiwis use firearms recreationally and I oppose recent trends that demonize these weapons.

There is no reason why NZ children cannot be instructed in the safe use of guns under controlled conditions.

In Primary Schools contact may be limited to familiarization with guns and exposure to safe handling procedures but in Secondary education this should be expanded to sporting avenues where opportunities exist.

I support the development of sensible policies for schools where the safe handling and use of firearms is a priority, and where sporting considerations are encouraged.

Sent from [Outlook](#)

From:
To: [Health & Safety Info](#)
Subject: Sub 16 - RE: Consultation on draft guidelines for schools developing a firearms policy
Date: Tuesday, 6 March 2018 9:16:53 a.m.

Dear Sir/Madam,

As follow-up to my previous submission (below) I would like to add that the handling of military weapon systems by students is not addressed in the draft policy guidelines. The guidelines only deal with the handling of firearms and restricted weapons classified under the Arms Act and does not address any supervised handling of military firearms, nor does it roll in the Defence Act 1990, under which I believe NZDF Defence Force Orders governing the handling of military weapon systems apply (which provides a step-out for the military from the jurisdiction of the Arms Act and associated Regulations).

I believe it is wholly appropriate for students to be allowed to handle a military weapon system under close supervision of a member of the NZDF who is qualified as a trained instructor, as long as the weapon is in the unloaded state and confirmed clear before it is transported in a secure manner to the school. This is a perfectly safe approach to educating students and may inspire some to pursue a career in the NZDF one day.

Thanks and regards

From:
Sent: Monday, 5 March 2018 5:01 p.m.
To: 'healthandsafety.info@education.govt.nz' <healthandsafety.info@education.govt.nz>
Subject: Consultation on draft guidelines for schools developing a firearms policy

Dear sir/madam,

Having read through the draft guidelines for schools developing a firearms policy, I think it is actually a reasonably well thought out document.

Aside from a couple of grammatical errors to tidy up there is not much I see fit to change, apart from perhaps adding a comment in the introduction cautioning school boards to think carefully about the limitations they might impose on their students' education and the school's role in the community if they decide to impose a ban on firearms from their school and elect to adopt no policy governing the use of firearms at their school.

From:
To: [Health & Safety Info](#)
Subject: Sub 17 - Draft guidelines for schools developing a firearms policy
Date: Tuesday, 6 March 2018 9:08:24 a.m.

Hello,

In broad the guidelines seem sensible, covering the regulatory and safety aspects of firearms on school grounds.

I worry that there is scope within the guidelines to push the policy towards burdensome. If each school can add policy and requirements and permits and paperwork, some schools may be pushed by adults frightened by guns to making that paperwork so burdensome that other more sensible adults are dissuaded from providing safe handling of firearms instruction. I believe this situation must be avoided, as teaching safe firearms handling (and importantly, non-handling for younger students) to children is of benefit to society.

Technical Note (typo). There appears to be a word missing on Page 7: "Inter-school shooting competitions", "Category A (or if at pistol club)", The second table entry appears to be missing "pistol" or "Category B" or such.

My personal view is that teaching safe firearms handling at schools is a beneficial activity, as it will reduce firearms accidents by children, and may also lead them to grow into adults who are less in fear of these essential tools. Many adults seem to have only been educated on firearms by Hollywood and this leads them to all manner of inaccurate conclusions.

Thanks,

--

Citizen, Shooter, Voter.

From:
To: Health & Safety Info
Subject: Sub 18 Guns in schools.
Date: Tuesday, 6 March 2018 9:53:39 a.m.

Hi. My name is (name redacted) . In March 1976 , I was a 14 year old schoolboy who was involved in a near fatal accident at a school camp at Pakeho in the King Country. The NZ army & (name redacted) High school ran a school camp where we had a mock battle at 2 am in the bush. I ran over a limestone bluff striking my head on rocks on the way down. I received a Hematoma, 2 pints of blood taken off my brain. We had guns using blanks. No ACC or compensation was ever paid to me. The real danger of guns in schools is teachers & admin who think they are Generals & Majors who all run for the exit when it all goes wrong ! It was all quietly covered up & I am left to salvage the rest of my life.

I think you will struggle to find any record of this in ministry files but I assure you it did happen. (Name redacted) was principle then. He was not involved with camp. All I have ever wanted was a fair go over this. Thank you.

From:
To: [Health & Safety Info](#)
Subject: Sub 20 - Draft firearm guidelines
Date: Tuesday, 6 March 2018 11:49:05 a.m.

To whom it may concern,

I have learnt about this draft from reading someones post in 'Neighbourly' and am tremendously concerned that this suggestion has been approached for consideration.

Below, is what I have posted in 'Neighbourly' and I wish to submit it as part of my objection to your proposal.

"It's definitely a resounding "No" from Me. I am not against firearms totally as I do believe that there is a time and place for these tools to be used purposefully. However, teachers are trained to be teachers. They are already stretched to their limits with paperwork, legalities and continual attendance of professional training outside of the classroom setting. What is happening in the United States should serve as an extremely bad example of decisions, comments and actions made by elected officials to our Ministry of Education executives."

The young adult who went and shot people did so out of exasperation (and depression) because nobody was willing to take the time to make him feel like he was a productive member of society. All the research, papers published and media awareness campaigns that come from the Mental Health section encourages compassion and understanding amongst other abilities to get alongside troubled young people (and adults) to support them in finding improved solutions for their situation.

I believe that by arming our teachers, it would not only take away this valuable window of opportunity for these troubled people but it would also cause more legalities for our NZ teachers to contend with; as well as instilling fear into our tamariki and matua.

I was not raised in a fearful and hateful New Zealand. Is this really what you want for generations to come and for them to think it is okay???

I implore you to reconsider this proposal and come up with better solutions.

Yours sincerely

From:
To: [Health & Safety Info](#)
Cc:
Subject: Sub 21 - Consultation on draft guidelines for schools developing a firearms policy
Date: Tuesday, 6 March 2018 5:05:43 p.m.

To Whom it may concern,

I read with interest you are undertaking a consultation on firearms in schools. As the parent of a pupil of Auckland Grammar School, who is of the school clay target shooting team, I have some experience in the practicalities and need for a clear and universally understood policies.

Given the recent tragic events in the USA in the uncontrolled environment of their firearm legislation, I am appalled to see the President of the United States calling for teachers to be armed to deal with the problem. This shows a distinct lack of leadership. I am however pleased and congratulate the Ministry of Education in taking a proactive and pragmatic approach to clarifying the best policy for New Zealand secondary schools, even though there is a great deal of emotion surrounding the presence of firearms in schools at this time.

Auckland Grammar has a proud reputation in helping prepare our young men for adult life and I see the extension of that to a responsible attitude towards firearms and firearm safety as important.

Auckland Grammar has also been proud to offer a wide range of sporting and cultural pursuits to extend our boys, and this extends to shooting disciplines, in conjunction with clubs such as the Waitemata Gun Club in Riverhead.

Shooting is a logical component of that offer. Shooting is a Commonwealth Game sport where New Zealand has traditionally performed very well. At this year's GC2018 games there is a full programme including – Fullbore Rifle Target Shooting, Pistol, Smallbore Rifle Target shooting and Trap and Skeet shooting (clay targets – Shotgun). This is very similar to the events at the Olympic games for both men and women.

Shooting Events at the Olympic Games

DISCIPLINES	MEN'S EVENTS	WOMEN'S EVENTS
RIFLE	50m Rifle 3 Positions 50m Rifle Prone 10m Air Rifle	50m Rifle 3 Positions 10m Air Rifle
PISTOL	50m Pistol 25m Rapid Fire Pistol 10m Air Pistol	25m Pistol 10m Air Pistol
SHOTGUN	Trap Double Trap Skeet	Trap Skeet

Schools such as Auckland Grammar are well versed in providing the correct approach to teaching. The considerations in teaching include safety aspects of the Arms Act and the more recent Arms Regulations. This covers everything from the seven basic safety rules for handling firearms as well as storage and firearms licencing requirements. This is well covered in terms of considerations and guidelines in the draft document.

It is wise to extend the school's responsibility and awareness of requirements for the Boards of Trustees under the Health and Safety at Work Act. These necessarily include the drafting of a clear policy (which your guideline provides excellent guidance on), and the need to fully manage

risks through identifying the hazards, assessing the risks, and controlling and monitoring those risks in accordance with the Arms regulations.

The only area I think we should provide more guidance from a practical point of view is the consideration of safe storage of firearms at school to take account of the time outside the actual activity. At present as my son has a particular sporting shotgun to assist the improvement of his shooting, I (as a licenced firearms holder) travel to the school for each event, with the shotgun in a transport case, and physically hand this to the supervising teacher. It would make more sense and be a better control mechanism in my opinion for the school to have an approved firearms locker, inspected and approved by law by the local police arms officer, which the firearm is deposited into and the teacher then accesses at the time of the event. As there has not been the move in the past to set a school policy this has not been investigated to my knowledge, but I would encourage all schools who are considering shooting sports to set up this type of approved facility. I would happily as an interested parent contribute to the cost of it, as it provides a safer environment and regular process.

Thank you for the opportunity to participate in the consultation process. I would be happy to be consulted further if required.

Yours faithfully

From:
To: [Health & Safety Info](#)
Subject: Sub 22 - Draft guidelines for firearms in schools
Date: Tuesday, 6 March 2018 5:58:32 p.m.

Hi there my name is (name redacted) and i have 3 girls the oldest being 9. I am writing to you about my concern with talk of no more firearms in schools. This country has had firearms saftey and sports shooting in schools for 150 years and there has been not one incident around this. What ever they are doing now is proof that it works and works well. My oldest girl loves shooting and i would be very upset if that was taken away in schools before she even has a chance to have a go. If its requirements that need addressing then if you read the arms code it covers all the requirements you need to follow concerning firearm saftey. Every licenced firearms holder in the country is expected to read and understand the arms code. Im sure the kids that already shoot in schools have a understanding of firearms safety before the even touch a gun so the arms code is a must. Plus currently i asume they are taught by a licenced firearms holder if not then that would be a priority but i would be very suprised if that isnt already the case. So my ideas are #1 teach the kids the firearms code safety instructions. #2 a firearms licence holder must teach them also.#3 the firearms must be stored off school property and looked after by the firearms licenced holder who is responsible for the teaching of these kids. Im sure it works like that now as after 150 years there has been zero incidents. I hope i have helped with your decision making and i will be glad to help out in any other way in this matter as i also have shot in some competition shooting. My cell number is (cell redacted) if you need any help. It may supprise you but shooting is right up there as one of the safest sports in the world and as a licenced firearms holder i would love to see it stay safe and stay in schools. Thank you

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From:
To: [Health & Safety Info](#)
Subject: Sub 23 - Submission Feedback Fire-Arms-In schools
Date: Tuesday, 6 March 2018 10:24:36 p.m.

Good Evening,

I submit below my feedback for your guidelines for firearms in schools.

I 100% support these guidelines and demand the current government to educate our children on firearms, their safe operation and potential risk of harm in NZ.

This current media fueled firearm debate is no different to sexual education in the school classroom. Our children are not having sex in the classroom when we bring sex into our classrooms. But we do it so they can learn how to protect themselves and who to talk to when faced with sexual decisions or advances. This same ideology can be said about all current firearm programmes in NZ schools today.

I wish that if my two children were also faced with firearms in the public arena not in my presence that they too know who to contact and how to keep themselves safe. If you don't know what to do in a situation how can you be expected to do it right?

I will teach my children myself but who will teach their friends or peers if their parents are not or do not know a licensed firearm owner?

We do not need to teach how to shoot, that is up to the parents and the individual student to decide how and when to do so but we do need to teach SAFETY! I had a very recent argument with a current South Auckland Police officer who has had the unfortunate experience of children with access to unlawfully obtained/stored firearms and was absolutely gobsmacked at his blind view that all weapons need to be banned. In contrary I reminded him of his oath to up hold the law and TEACH yes TEACH these people in the community in what is not appropriate and at the same time prosecute those in the unlawful possession and use of firearms. Just because these children he had seen had access to these potential weapons is not reason enough to ban them. These children have obviously not been taught the consequences of not being a licensed firearm owner or the consequences of their misuse or I believe they would have called the police or another sensible adult to remove these weapons from their households.

Imagine for a second the potential future law abiding citizens you could unintentionally recruit in the police front line by the way of educating our children not in how to shoot firearms, but just where to use firearms safely, and more importantly HOW TO MAKE THEM SAFE OR RECOGNIZE THEY ARE SAFE or at the least understand the very real dangers of firearms and know who to call or ask for help.

Everyone knows what to do in case of a fire because we TEACH them to get down, get low, get out and call 111.

Everyone will know how to handle, store and use in the presence of or better yet as a

legally licensed firearm owner of NZ if we just teach them to do so.

All that is needed is education and where not better than use our experts already in our schools and communities.

If a child wants to shoot a firearm I would love to see them be given an introduction to firearms in their respective community and be encouraged to join local gun clubs and better yet, the NZ Deer Stalker Association to satisfy that desire. The NZ Deer stalker association holds frequent hunting training programmes for all ages with the ethics required to use firearms for a legal purpose.

I would be deeply saddened if our future generations are exposed to firearms only through TV or video games that only display the violent nature of firearms and encourage killing of others in online gaming platforms while attributing to the ever increasing child obesity rate of NZ. Get our children outdoors and if they choose to collect game/pests for exercise or food, its 100% legal and better yet 100% natural if done properly. If this government is realistic about being predator free in 2050 then they are going to need future recreational hunters help to achieve this.

I support with my whole heart the education of firearms and their respective presence in schools as per the guideline proposal above. Schools will not blindly bring kids in contact with firearms without parents knowledge as the school curriculum will state and offer these classes/programmes. Parents have the right to refuse their child these programmes as they see fit, the same rights parents exercise with respect to religious studies and sexual education.

As a father of two beautiful girls being raised in the true Clean Green Back Yard of NZ and as a licensed firearms owner, hunter and NZ Deer Stalker Association member we cannot miss the opportunity to educate safety in this topic, not now or ever.

For your action.

Best Regards

From:
To: Health & Safety Info
Subject: Sub 24 - Firearms in Schools Policy
Date: Wednesday, 7 March 2018 1:03:12 p.m.

Hi,

I was having a quick read through the guidelines and I have a question in relation to pest management at a school. It talked about having a trained professional coming in to remove pests e.g. magpies, possums, rabbits etc. Often this would be required in rural and at times much more remote places. The concern with that is finding a 'professional' to do it, especially when pests can hide and appear at different times.

Regards

From:
To: [Health & Safety Info](#)
Subject: Sub 25 - Consultation - Draft guidelines for schools developing a firearms policy.
Date: Wednesday, 7 March 2018 11:23:18 a.m.

Hi,

I fully support schools allowing firearms to be present in an educational setting within schools. Not that I believe a policy is required given the existing legal requirements. Given the following considerations:

- The arms act is fully adhered to (as in the legislation, not the police policy that varies and may not always be in keeping with the legislated intent).
- The trainer (being the holder of a firearms license) is fully versed with firearms safety and is in immediate supervision of the firearm and person handling a **loaded** firearm unless exempt as they are performing the training as part of their duties as a police or military person.

It seems to me that the scenarios and concerns at play here are already covered fully by the arms act and health & safety requirements. Any policy further than the requirement to adhere to these and whom within the school would be responsible for confirming adherence would be excessive.

Regards,

From:
To: Health & Safety Info
Subject: Sub 26 - Guns in schools
Date: Wednesday, 7 March 2018 12:02:02 p.m.

1. Guns have been in schools for over 150 years without problem. This engineered issue is extremist Green Party agenda at work. They are now boasting on social media about the problems they are causing.
2. School shooting clubs are the oldest youth service organization in the nation. Show some respect.
3. Grey guns are a big issue. Guns held illegally for lawful use. Big Maori family sharing a rifle for hunting etc. NOT stored safely. Often NOT handled safely. Kids need to be safe when they find these.
4. There are many illegal guns in the community. Because the government is piss weak on crime. Kids need to know what to do if they stumble on one. Also so they can teach / protect other kids. Also so they can shame adults into safe storage.
5. Some loathsome manipulators have suggested that migrants will be made to feel unsafe. Firstly rubbish. Secondly, we dont surrender our culture to new arrivals. We teach them our culture. Lastly, it will do them good to see that our army is friendly and not corrupt or dangerous or oppressive. So career days with the forces are a positive.
6. Shooting teaches responsibility and is social. It belongs in schools because that is where we teach kids.

This is the post modernist, libtard agenda at its worst. No issue. No problem. Go away.

Yours with toxic masculinity,

Hazard identification/Risk Management Procedure: xxxxxx School - Firearms Safety Club

Activity Leader/ Instructor: J _____ F _____ - (Current Firearms License No. R _____ expires

Date: Term 3, 2015,16

Location: xxxxxx School and Adjoining Farmland/Shooting Range

Hazard:	Significant Hazard?	Eliminate?	Isolate?	Minimise?	Hazard Controls Required:	Person Responsible:	Initial/date Complete:
Parental Concern				✓	<ul style="list-style-type: none"> Develop a comprehensive Hazard ID/Risk Management procedure to be put in place prior to the activity. Notify all parents/caregivers of activity via school newsletter. Ensure permission is received from parents/caregivers of all participating children. Provide evidence to parents/caregivers that a comprehensive Hazard ID/Management procedure is in place for the activity; Provide parents with course programme and Risk management procedure. Programme approved by xxxxxx Police. Parents of participating children will receive a course description; this risk management form and return a permission slip. 	BOT	
Children who demonstrate unsafe behaviour	✓			✓	<ul style="list-style-type: none"> Number of participating children will be limited to six (6) Children under the age of nine (9) will not be eligible to participate. Each participating child will be vetted by Teaching Staff before participation. 	Principal	
Uncontrolled access to Firearms at School	✓		✓	✓	<ul style="list-style-type: none"> Firearms will be securely locked away at all times when not being used for training purposes. Bolts & ammunition will be securely stored separately; All firearms and ammunition will be under the direct control and supervision of the instructor at all times. No participating child will handle firearms - loaded or otherwise - unless they can demonstrate a sound understanding of firearms safety. 		
Unintended discharge of Firearms	✓		✓	✓	<ul style="list-style-type: none"> All firearms and ammunition will be under the direct control and supervision of the instructor at all times. Firearms will not be loaded during indoor training sessions. Children will only handle unloaded firearms during indoor training sessions. 		

						<ul style="list-style-type: none"> Live ammunition will only be provided for firearms in a safe field (shooting range) situation, once instructor is confident in the participating child's knowledge and understanding of firearms safety and operation (week 4 and 5 of 5 week course). Teaching Ratio (in Class) 1-6 Teaching Ratio (on firing range) 1-3 All firearms and ammunition will be under the direct control and supervision of the instructor at all times. All live firing will be undertaken in a controlled safe environment on a purpose designed shooting range. Each participating child will be directly supervised during live firing. Other participating children will be directly supervised by a second instructor at a safe location behind the shooter during live firing; A clearly defined "ready-to-fire" procedure will be followed by instructors before live firing. Only a single round of ammunition will be loaded into the firearm for each live firing event. .22 calibre firearms will be used for live firing, unless instructors have confidence in the training, safe behaviour and ability of a participating child, in which case, 4/10 shot guns may be used, subject to all the procedures set down in this document, being followed. All firearms used will be well maintained and checked prior to live firing. Tutor will have a current Firearms licence. Tutor will observe all safety aspects as per the "Fire arms code". 		
Discharge of firearm in an unsafe manner	✓			✓				
Firearm malfunction	✓							
Unqualified Tutor								

Other Instructors:

____ (BOT Trustee) - Current Firearms License No. _____ expires _____

Range Officer _____ - xxxxxx pistol club

From:
To: [Health & Safety Info](#)
Subject: Sub 28 - Draft Policy for Schools developing a Framework for Firearms in Schools
Date: Wednesday, 7 March 2018 8:56:18 a.m.

Dear Sir/Madam,

Children are best served by a safe and structured introduction to activities that could cause them harm. There is ample media and film content readily available to children over the internet and or television or video games that does not introduce firearms in a safe and constructive manner. There are studies that also show children are naturally curious and show disregard for safe use of firearms when presented with access to a firearm without proper instruction.

A policy framework that allows for the safe and educated use of firearms will do much to ensure children who come across firearms in a home or public setting show respect and control. I support the proper introduction of firearms safety to children at school with the consent of their parents on a voluntary basis.

Thank you

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From: [SE&S Ministerial Team](#)
To:
Subject: Sub 29 - FW: Feedback from education.govt.nz
Date: Wednesday, 7 March 2018 2:17:33 p.m.

Hi

Could you please respond to this one?

Thanks

From: Enquiries National
Sent: Wednesday, 7 March 2018 11:04 a.m.
To: SE&S Ministerial Team <SE&S.Ministerialteam@education.govt.nz>
Subject: FW: Feedback from education.govt.nz

Hi

Can you please respond to this?

Thanks

Enquiries National Team | Ministry of Education ^MC
33 Bowen Street, Wellington
education.govt.nz | [Follow us on Twitter: @educationgovtnz](https://twitter.com/educationgovtnz)

From: Web Channel
Sent: Wednesday, 7 March 2018 10:49 a.m.
To: Enquiries National <enquiries.national@education.govt.nz>
Subject: FW: Feedback from education.govt.nz

Kia pai to ra

From: no reply
Sent: Tuesday, 6 March 2018 12:51 p.m.
To: Web Channel <Web.Channel@education.govt.nz>
Subject: Feedback from education.govt.nz

**Describe the page or copy and paste the link (URL) to the page
This will help us identify the page you were on:**

www.education.govt.nz/assets/Documents/Ministry/consultations/Firearms-in-Schools-Guidelines-March2018.pdf

Your feedback

Please provide your feedback:

What you need to do is take your morbidly pathetic guidelines further up the legislative scale and help ban firearms altogether. Remember it's the arms manufacturers that are the base cause of all death, destruction, and misery that results from conflict worldwide.

I will willingly have an ongoing conversation with anyone about this, either in specifico or as a general topic. My email is

Thank you ,

If you would like to be contacted about your feedback please provide a name and email address:

Your email address (if you would like a reply):

From:
To: [Health & Safety Info](#)
Subject: Sub 30 - Firearms in schools
Date: Wednesday, 7 March 2018 5:06:24 p.m.

What a ridiculous idea! Firearms, and or, firearm training has no place in New Zealand schools!

From:
To: [Health & Safety Info](#)
Subject: Sub 31 - Firearms in schools
Date: Thursday, 8 March 2018 9:09:50 a.m.

I personally think fire arms in schools should be allowed under supervision quite frankly they are used for sports and career education. If you take clay bird shooting away then are you going to remove archery? What about rugby as I'm sure there are more injuries/deaths from scrums? As for the defence force career education as long as the weapons are unloaded I see no difference between a styer ond a cook showing kitchen knives. Children are taught that they are both dangerous and both tools. This subject has only been raised as a knee jerk reaction to what has happened in the USA and I believe the USA has many different social and law issues than nz and we shouldn't change based on those fares.

Thank you

Sent from my iPhone

From:
To: Health & Safety Info
Subject: Sub 32 - Firearms in schools guidelines
Date: Saturday, 10 March 2018 4:04:25 p.m.

To whom it may concern,

I am happy with the guidelines that have been proposed in regards to firearms in schools, and think it is very important for kids/young adults in New Zealand to be involved in shooting sports and hunting. I believe that it is best to explain and emphasis safety around firearms from a young age rather then shelter children/young adults from firearms. Firearms have been and will continue to be a big part of New Zealand culture. Currently we have the best firearm laws in the world and an extremely low rate of gun crime, I believe part of the reason for this is that a lot of us (New Zealanders) have been bought up around firearms and taught to respect them.

Kind Regards,

From:
To: Health & Safety Info
Subject: Sub 33 - Firearms in schools policy guideline feedback
Date: Friday, 9 March 2018 1:21:12 p.m.

I see great merit in introducing our young New Zealanders to the responsibility, safety, educational and sporting aspects of firearms. This might include target or smallbore shooting, clay bird shooting. Additionally, many opportunities for cooperation exist within our communities through such activities as rural community events, career visits from the New Zealand Defence Force, or hosting historical displays at the provincial or national level.

From:
To: [Health & Safety Info](#)
Subject: Sub 34 - Submission Regarding Firearms in Schools
Date: Friday, 9 March 2018 6:42:22 p.m.

To Whom it May Concern,

As a secondary teacher in training myself, I find it appalling the idea that schools may soon be permitted to have firearms on their properties. It is not only concern for teacher and student safety that makes me so adverse to this idea, but it is also the fact that I don't see the relevance of having to have firearms on school premises.

I encourage the sporting activities that involve firearm usage, however, I believe that these activities could be, and should be, conducted outside of school grounds. Many extra-curricular activities are conducted outside of school grounds successfully, and I am sure that students who are interested in these activities would be more than happy to travel. Or, as an alternative, the school could organise shuttle buses or teacher vans to travel to the activity and potentially fund these activities.

I speak on behalf of many of my fellow cohort when I say that I do not believe that allowing firearms on to school property is an answer to stimulating co-curricular activities involving firearms.

Thank you for your consideration.

Kind Regards,

From:
To: Health & Safety Info
Subject: Sub 35 - Feedback on draft guidelines for guns in schools
Date: Sunday, 18 March 2018 12:29:04 p.m.

On behalf of my Mother (name redacted):

“As a grandmother of two young boys I was appalled to hear that guns were brought into schools under any circumstances. Hunters and Army personnel should be doing any training, education or handling of guns on their own premises and NOT in schools.”

From:
To: [Health & Safety Info](#)
Subject: Sub 36 - Firearms Safety in Schools
Date: Friday, 16 March 2018 3:23:51 p.m.

To whom it may concern,

Policies for the use and safety of firearms in schools is currently being reviewed and will no doubt bring forth a range of submissions, many of which may not have a good grounding in fact.

My submission is as follows:

Firearms in NZ are very regulated and cannot be held without the appropriate licenses and storage facilities. Thus if a school is considering a policy about firearms, compliance with the law is the most important issue. What is likely to be generated by the submissions is a discussion about the legitimacy of firearms in schools, so I feel compelled to comment on that.

NZ (and indeed almost every country) has a history that involves firearms for a wide range of uses. Over the years NZ has acquitted itself very well in national and international competition right up to Commonwealth and Olympic events in various shooting disciplines. This can only happen if young people gain a passion for the sport, as they do with every other competitive situation, be it rugby, golf, dance or kapa haka. Encouraging young people to pursue their passion and to excel at it is a fundamental role for schools combined with the more mainstream subjects. We cannot expect to develop well rounded young people if we restrict them to classroom subjects.

In the school scenario, it is most likely that firearms will be part of a target shooting team or club, often involved in interschool and inter club competitions, or may in some cases be part of organised activity outside the classroom such as camps and pest control events.

We should not shy away from the presence of firearms in our society just as we do not shy away from the use of vehicles (which have a fatality rate approximately 300 times higher than firearms each year) or water where many people also lose their lives each year. We need children to know about firearms and to learn this in a controlled environment so that we can avoid the tragedies that occur in places like the US. Being fearful will not resolve the matter.

I have a daughter who shoots (smallbore target) for her school and for her club at very high levels and is very successful at her chosen sport. This has been facilitated by people (teachers and club members) willing to take the time to train young people, ensure they operate safely and are fully supervised. At no time is there risk to the people (especially the students) as a result of these activities. In fact the contrary is true; these students are very careful around firearms and they ensure others are as well. They have developed a remarkable level of maturity as a result of this training.

I support your efforts to provide guidance to Boards, staff and principals and as a past BOT Chair believe this is the right approach. I would be very disappointed if this discussion became one of whether there is a place for firearms in school activity as a strongly submit there is and by doing so provides us the best possible protection from the situation we see occurring overseas.

Yours sincerely

From:
To:
Subject: Sub 37 - FW: Feedback on firearms in schools consultation
Date: Thursday, 15 March 2018 9:33:43 a.m.
Attachments: [image001.png](#)

Hi

I have a couple of comments from Police re the discussion document. Nothing further at this point

Policy and Partnerships



From:
Sent: Monday, 12 March 2018 4:15 p.m.
To: Subject: Feedback on firearms in schools
consultation

Hi

Feedback as below. Only two points from my chair.

Thank you.

Page seven

Auctions involving firearms (The dealer must have the correct licences and endorsements for the type of firearm.)	All firearms	A school staff member who is a firearms licence holder needs to sight the dealers firearms licence (Local Arms Officer can help with this).
---	--------------	--

Third column "(Local Arms Officer can help with this)". This should not be restricted to Arms
Officers and would be better to read 'local police can help with this'.

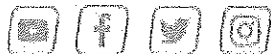
Resources to help you to develop your Policy

- » **NZ Police Firearms Offices:**
<http://www.police.govt.nz/advice/firearms-and-safety/firearms-offices-and-contact-details>
- » **Arms Code:**
<http://www.police.govt.nz/advice/firearms-and-safety/arms-code>
- » **New Zealand Secondary Schools Sports Council:**
<http://www.nzsssc.org.nz/>
- » **Watch a series of videos produced by the Mountain Safety Council and Big Game Hunting NZ:**
<https://www.youtube.com/playlist?list=PLeLnlpLtcBkQ6XcRUijUTEgSgdo9u69KF>
- » **WorkSafe New Zealand:**
<http://www.worksafe.govt.nz/worksafe/>
- » **Firearms Specialist services:**
www.fss.nz
- » **New Zealand School Trustees Association:**
<http://www.nzsta.org.nz/>

The Mountain Safety Council is happy to answer any questions you have around setting up an event involving firearms: firearms@mountainsafety.org.nz

The first link to the Police Firearms Offices could be removed as by accessing the Arms Code any user will be on our site and able to access what is required.

Arms Act Service Delivery Group



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From: [Firearms Safety](#)
To: [Health & Safety Info](#)
Subject: Sub 38 - Draft guidelines for firearms policy in schools - feedback
Date: Wednesday, 14 March 2018 2:46:34 p.m.

Good afternoon.

Thank you for the opportunity to provide feedback on the Draft Guidelines for Firearms Policy for Schools.

I make the comments as the Chair of the Firearms Safety Council, drawing on 32 years as a police officer, 14 of those as the inspector managing arms control.

I am also a member of a BOT, and was the Police representative on the writing of the EOTC guidelines.

I suggest that where the document refers to Arms Act 1983, Arms Regulations 1992, it also refer to *The Arms Code*. In my experience, the Code is the document which the judiciary, including the Coroner will refer to for the standards of firearms use.

On page 6 reference is made to 'category A Firearms (sporting shotguns and rifles). "Category A' has only ever been common parlance. I think it's fine to use the term, so long as you are aware of this.

Page 7 refers to 'Defence force visits'. I suggest this read 'Defence force and Police visits'. The reason being that both Defence and Police possess firearms outside the Arms Act and Regulations, by virtue of section 3 of the Arms Act, and then only in the course of their duties. Once defence or police provide their firearms to another they arguably bring themselves within the Arms Act and Regs and are subject to all the provisions of that legislation, including the offence provisions. Perhaps it would be worth reviewing section 3 as to what other occupations should be included.

That same line line states that 'no student, etc..... may hold or possess a restricted firearm during defence visits'. I suggest including 'or Police'. I also suggest restating this in the positive: *Only NZDF or Police personnel may hold or possess firearms* (note, not limited to restricted firearms) *possessed by NZDF or Police*.

On the same page, 'civil defence and emergencies', add *see defence force visits above*. NH90 helicopters have armed personnel on board. This thereby covers them.

Page 8: Change 'should' to *must* on the lines relating to MSSAs and restricted weapons (i.e. 'it must not be handled by the students').

Page 9: the Seven basic safety rules. I suggest beginning this heading with *The New Zealand Arms Code*.

Page 10: where visitors are coming into the school with firearms, consideration should be given to advising local police. Police are better placed to advise here.

Page 13: include 'advise local police' under roles of principal. *Include Arms Regulations and Arms Code* after Arms Act 1983.

I trust this feedback is useful.

Having given this feedback, I think that Police and Defence need to work out ways that they can lawfully take their firearms into schools. I am thinking in particular of situations whereby a parent, or parents are invited to share their work. This would particularly apply to NZDF where major numbers of pupils at a school are the children/grandchildren of NZDF personnel.

Cheers, and happy to discuss.

Joe Green

Chair

Firearms Safety Council of Aotearoa New Zealand

From:
To: [Health & Safety Info](#)
Subject: Sub 39 - Consultation on draft guidelines for schools developing a firearms policy
Date: Monday, 12 March 2018 12:20:10 p.m.
Attachments: [image004.png](#)

Hi Health and Safety team,

I just noticed that in the draft guidelines, page 9 - Seven basic safety rules for firearms, rule 7 states "Avoid alcohol or drugs when handling firearms".

I believe this should be "Avoid alcohol and drugs when handling firearms". I note the police guidance page <http://www.police.govt.nz/advice/firearms-and-safety/arms-code/seven-firearms-safety-rules> shows the use of "And" in the header links, but in the contents section they use "or". I also note the same error exists in the 2013 version of the Arms Code, and I have notified NZ Police (from my home account) of this error.

However the descriptions and logic all dictate this should be "and".

Regards,

From:
To: [Health & Safety Info](#)
Subject: Sub 40 - Re: Draft guidelines for schools developing a firearms policy
Date: Tuesday, 20 March 2018 9:34:08 a.m.
Attachments: [image002.png](#)

Kia Ora

Nga mihi

Thank you for the opportunity to read and submit feedback, I have a strong view on "guns in schools" both as a psychologist and as a family person with grandchildren in the school system, and following the shootings and outcries both in Australia and U.S. in regard to gun laws.

Also, having talked to students at a local high school in this regard with the strong sense that we ought to have a zero tolerance for violence of any kind in our schools and a policy of

"NO GUNS IN SCHOOLS"

This was their loud cry with eyes widened at the thought!

As educators we need to model the behaviour we want, i.e. peaceful solutions, so my feedback is mixed, both requesting "no guns in schools" but also developing policies which strongly advocate greater restrictions.

Again thank you for the opportunity to submit, I would like some feedback when you have a moment.

From:
To: [Health & Safety Info](#)
Subject: Sub 41 - Guidelines on firearms in schools
Date: Sunday, 25 March 2018 9:57:08 a.m.

Ministry of Education;

I recently read with some interest your request for consultation on the circumstances under which it would be appropriate for students to handle firearms in schools.

Given the emotive nature of this debate, I applaud your efforts to consult the community before implementing any knee jerk bans. Some people seem to feel that firearms should not be allowed in schools under any circumstances, this reaction seems to be rooted in fear and paranoia and have little basis in how firearms are typically used in New Zealand and under what circumstances.

There are approximately 250,000 licensed firearms users in New Zealand and a concomitantly large number of firearms available, mostly the sorts of rifles and shotguns suitable for hunting. We are fortunate to enjoy a very low level of gun violence largely because the sorts of firearms overwhelmingly used in homicides overseas; pistols, are heavily restricted here - in the USA over 80% of gun homicides are committed with pistols; deaths due to long guns are around 300 per year, a tiny fraction. Gun crime in reality could more accurately be described as pistol crime.

Given this New Zealand context, under what circumstances could firearms legitimately be present in schools?

- Hunting and target shooting are all legitimate uses and school clubs exist to allow people to participate in these sports - people who may not get the chance otherwise given how expensive firearms can be.
- Allowing students to handle unloaded firearms and learn good safety habits, under supervision, could only improve New Zealand's safety record given the ubiquity of firearms here; this would also be a circumstance in which allowing firearms in schools would improve people's safety.
- Displays by military personnel are also a legitimate use of firearms in schools, opposition to this seems to be motivated more by some individual's discomfort with the military as an institution than any rational reason, given that this has never led to any sort of adverse safety incident in New Zealand or in fact the entire developed world.

I would also point out that the age at which one can first obtain a firearms license is 16, meaning many year 11 and older students can legally own and handle firearms. Allowing, or at least not prohibiting, these students from gaining more experience handling firearms in a safe and supervised manner can only improve student safety.

Sincerely;

Minister of Education -Hon. Chris Hipkins
Parliament Buildings
Private Bag 18041 Wellington 6160

30th March 2018

Dear Minister

NO Firearms in New Zealand Schools.

Please make it government policy that no firearms nor training is permissible in New Zealand schools.

I was shocked upon reading the 'Draft Guidelines for Firearms Policy for Schools' which implies that it is acceptable to have guns and gun training in schools.

The suggestion to 'operate a gun club' and 'inter-school shooting competitions' as a sport for young school students is disturbing and wrong.

One must ask the question: why is NZ trying to emulate the worst aspects of American culture?

The Guidelines state: 'When it might be legitimate to allow student involvement with firearms' and presents a variety of scenarios for the use of guns at schools.

These premises are skewed and the justifications are misleading by those who are promoting a gun culture. Probably the industry is trying to increase sales through making gun culture 'normal' attractive and necessary. There should be NO firearms industry sponsorship in schools.

Eradication of rabbits or possums is mostly done with poison baits or traps. When guns are used for pig hunting or ducks it would not be on school grounds or never be done when students are there. If older students come from a family with guns they can learn the safety standards there or at an independent gun club.

Surely the Education Ministry does not want students under 18 years to be learning to shoot guns at school. This is an adult activity which already presents enough problems without indoctrination of the young to think it is 'cool' to play with dangerous weapons.

There is no excuse to bring military or restricted weapons into schools. It should not be permissible even for civilians to acquire military assault weapons. The current Arms Act 1983 is too weak and needs heavier fines for violation of Restrictions on Possession (Section 20 \$1000 is not sufficient deterrent) Also Section 43 Selling or Supplying Firearms needs more severe consequences.

Parents, teachers, students and schools are already overloaded with threats to health and safety through violence in our communities, cyber bullying, mental health disorders, youth suicide, drug and alcohol addiction, child abuse and the general dominance of 'violence and warfare as entertainment' on our TV, movie and computer screens.

Please do not exacerbate this problem further by making gun culture in schools normal. American students have had enough of this cultural indoctrination and are bravely rising up to demand dramatic gun control and reduction. The gun culture industry opposes them with the fallacious belief that 'more guns in teachers hands make you safe!' What rubbish!

The New Zealand Ministry of Education must reject gun culture and foster a culture of peace.

Kind regards

Firearms in Schools Guidelines

Submission on behalf of Tauranga Moana Women's Peace Group

Introduction

We welcome the opportunity to comment on the Draft Guidelines for Firearms Policy for Schools. As a group promoting peace in the community we see few reasons for the presence of firearms in schools while many reasons to oppose familiarising children and young adults with weapons. We believe that valuable time could be instead used in teaching students about building a harmonious society and dealing with conflict in peaceful ways.

Comments on some of the points raised in the Guidelines

Page 4, Principle 2.

Schools that decide to have a firearms policy should have such a policy clearly explained in their Health and Safety Policy.

Page 6

Definition of a firearm.

The definition refers to weapons using explosives. The Guidelines should cover other lethal weapons that do not use explosives such as hunting crossbows.

Page 7

Sponsorship

We strongly oppose any form of sponsorship by businesses or organisations involving firearms.

Defence Force Visits

We are concerned that some visits have recruiting as the underlying reason. Although the minimum age to join the Defence Force is 17, students can start the application process before turning 17 when they are still legally children.

If the Armed Forces are at all invited into our schools, their experience in civil defence matters could be a theme they are asked to explore with students. Demonstrating disaster relief strategies and Peacekeeping could be acceptable school events. We oppose visits that get students 'excited' about handling or viewing firearms as reported last year after a visit to Whakarongo School.

Each year there are Weapons Expos promoted as family activities. We do not think schools should be attending those displays and the Guidelines should have a warning to discourage Boards of Trustees from participating. It may not be possible to comply with the Guidelines recommendations on Military style semi automatic and restricted firearms.

Auctions

There is no place in a school for activities dealing with buying and selling firearms.

Inter-school shooting competitions

These activities seem out of place in a school programme. Weapons are not to be associated with sport and fun.

Amusement devices and Fundraising

As above.

Page 8

Immediate supervision

The Guidelines should clarify if it means one to one supervision or a different ratio.

Page 10

Communicating with parents, caregivers, school community and school visitors

Consent forms to be required before any activity involving weapons including Armed Forces visits and when arms are a part of the programme. No consent required when Armed Forces are presenting on civil defence matters.

Opt-out clause must be included. Non-participating students must be offered a meaningful alternative, with a clearly defined task to be completed. The students must be under appropriate supervision for the duration of the lesson.

Schools planning to have such a policy should consult widely with different sectors of their community as well as staff, parents/caregivers. If a school chooses to have a firearms policy, it should be available online.

The Ministry of Education should make public a list of schools with approved firearms policy.

Page 11

Early Learning Services/me nga Kohanga Reo

We do not support Evolve early childhood organisation move to issue, promote and use their gun safety kit. We stand with Dr Sarah Alexander of the early advisory group Child Forum who describes the programme as shocking. Under the guise of safety, the programme endorses gun play at an early age.

Conclusion

We support a comprehensive set of guidelines on weapons at schools. The safety of the staff and students is of paramount importance and the Guidelines are clear on this point. While we acknowledge that Boards of Trustees are entitled to formulate policies for individual schools, we believe that the Ministry should encourage activities leading to peaceful relationships in our

community and discourage those that can create conflict. The presence of weapons at a school even under strict supervision and seemingly legitimate purposes is likely to create unease in the community.

Thank you for the opportunity to comment on the Draft Guidelines.

Maria Cristina Sagarzazu

Marlene Ware

Joy Rising

Rupal Mehta

Merrill Simmons-Hansen

Mary Rose

Margaret Fay

Dolores Flynn-Edge

From:
To: [Health & Safety Info](#)
Subject: Sub 44 - my views on kids and guns
Date: Tuesday, 3 April 2018 12:18:38 p.m.

i am the writer (name redacted), and i have always destroyed all toy guns in the possession of my grandsons. i do not believe that guns are toys. my own daughter grew up without toy guns, but of course her oldest son was immediately introduced to toy guns by other boys and his father — who also bought he little boy a perfect replica gun at the two-dollar shop. sales of which ought to have been illegal in new zealand since they could get somebody killed — eg by the police.

i am also totally against advertising shows at schools organised by the new zealand military.

my own father was in the first world war from 1914 to 18 and was the only one of 21 boys in his school class to come out of the war alive.

i feel that my family has seen all the guns it ever wants to see for at least another century.

in peace, peace also is one of the names of my younger daughter ---

From:
To: [Health & Safety Info](#)
Subject: Sub 45 - Feedback on firearms in schools policy direction
Date: Wednesday, 4 April 2018 11:36:15 a.m.

Hi,

Seriously, if schools can't manage health and safety through the already rigorous risk management procedures and require a special firearms policy, I wonder what will be next.

I can guarantee that the money spent on creating this could have supported many underfunded students in classrooms across New Zealand.

Recommendation - fund students and not policies.

Cheers,

Deputy Principal

From:
To: [Health & Safety Info](#)
Subject: Sub 46 - Feedback
Date: Wednesday, 4 April 2018 2:08:17 p.m.
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)

Hello,

Further to reading information in the School Leader's Bulletin, I am writing to provide feedback on the Draft Guidelines for Firearms Policy for Schools.

Background:

I am the Principal of (redacted) located in Nelson, a member of the SPANZ National Executive, a member of the Nelson Waimea Gun Club and a warranted Mountain Safety Council Firearms Safety Instructor.

Please note however that in making this feedback I am not representing any of the above organisations – the following are my personal views only.

Feedback:

General Summary

In my assessment the Draft Guidelines skilfully navigate the various conflicting viewpoints that New Zealanders will have in relation to firearms in schools.

Areas for further consideration:

- a. The document appears to suggest in various places that Firearms in Schools relies on compliance with relevant legislation and with the Board of Trustees own policy in relation to Firearms in schools. If I am interpreting this correctly, it would be helpful to be more overt in stating that the Board of Trustees has discretion in this area and should accordingly have a policy regarding this.
- b. I am concerned that the section regarding "immediate supervision" (page 8), provides an interpretation of Immediate Supervision that will be at variance with the practice of gun clubs and paintball operators who have their own well established and frequently reviewed safety processes. It may be more helpful to revise the interpretation to make reference to the legislation and giving reference to the Safety processes and protocols of gun clubs and other third parties.

Thank you for considering this feedback and well done to the writers and working group for navigating this area fraught with differing views.

Warm regards,

From:
To: [Health & Safety Info](#)
Subject: Sub 47 - Fire Arms in Schools.
Date: Thursday, 5 April 2018 3:40:47 p.m.

To whom it may concern.....I would like to voice my opposition to the idea of schools being able to have guns on their premises.

I am a trained Primary School teacher and currently involved with a local Kindergarten. My feeling about this is that there is enough for schools to deal with as it is without putting the whole consultation process on to their work load, as well as the responsibility of having guns on their properties if it was decided to do that. There are plenty of avenues for schools to 'educate' on firearm use from our community, and engage in a sporting sense through local shooting clubs and people involved in these activities are very well trained and can pass this on to young people. If there are firearms on school premises it also means they are more open to being burgled specifically for the guns. I feel the current ruling on this which is banning firearms from any school premises, should remain in place.

Yours sincerely,

From:
To: [Health & Safety Info](#)
Subject: Sub 48 - Feedback on draft guidelines for schools developing a firearms policy
Date: Thursday, 5 April 2018 5:27:58 p.m.
Attachments: [image003.png](#)

I would like to submit my support for the proposed guidelines.

I believe the Ministry has developed a good balanced approach, that generally achieves the competing objectives.

Thank you for the opportunity to comment.

Stantec New Zealand

From: [Yvonne Duncan](#)
To: [Health & Safety Info](#)
Subject: Sub 49 - Draft guidelines for schools developing a firearms policy
Date: Friday, 6 April 2018 9:51:40 a.m.
Attachments: [Submission on draft guidelines for schools developing a firearms policy in NZ Schools.docx](#)

To the Ministry of Education

Attached find my submission on Draft Guidelines for schools developing
a firearms policy for NZ schools.

As the wife of a senior army officer and a very experienced teacher

I am well qualified to comment on this subject. This serious matter is not
one to be decided by individual schools but by national policy.

Please confirm receipt of this submission and keep me informed
of progress.

Yvonne Duncan QSM

Submission on draft guidelines for schools developing a firearms policy in NZ Schools

To the Ministry of Education 4th April 2018

I am very concerned that in your proposed guidelines, Boards of Trustees will be given the right to decide, after consultation with their communities, whether or not a gun policy will be adopted for their school. This gun policy according to information supplied could even give permission for gun storage at schools.

At present state schools are free of guns and should remain so. All of the reasons stated in the guidelines already happen without having guns in schools. ANZAC Ceremonies are held in communities around NZ by the RSA and are well attended by young people. Career days are held in schools now and work experience, if guns are involved, such as in military institutions, just require parental permission.

The issue of gun sports is covered by gun clubs and hunting clubs in communities. These are obviously very successful as shooting is an accepted sport in both the Commonwealth and Olympic Games and NZ Teams have competed successfully.

I am the wife of a senior army officer and also a very experienced teacher having taught at primary, secondary and tertiary levels during my long teaching career. During my seven years living in Waikouaiti Military Camp, I taught for two years at Waikouaiti Primary and also taught in Linton Camp School. There were no guns or gun safety courses in those schools.

Schools are already overburdened with the demands of society. Disabled children are now mainstreamed in our schools and in poorer communities schools are assisting with feeding children. Because of lower recruitment and housing shortages, there is a crisis of teacher shortages in some areas of NZ. Taking on a gun policy is an onerous task, as those schools will need to comply with legal and safety requirements and ongoing inspections. It will also cause conflict as parents have strong views on guns in schools! Yes they have the right to remove their children if they disagree with the gun policy but those children will be very likely to be harassed and bullied.

Gun storage will take problems to another level. What happens if there is an accident with a gun? Is the student or those in charge responsible? Storing guns could also make schools targets for criminal elements. The only reason I can think of when guns would be needed in schools would be the armed offenders squad if a school was attacked by someone with a weapon, putting students and staff in danger. I believe this is much more likely to occur in schools which have guns than those that don't.

NZ has a serious problem with family violence. In May last year the Auckland Herald published a series of articles on this subject. According to their research, the police attend on an average, one family violence incident every five and a half minutes which is 279 calls each day.

Children are present at 80% of all violent incidents in the family home. Family violence is estimated to cost our country between \$4.1 and \$7 billion per year. NZ has the highest rate of intimate partner violence and child abuse in the developed world.

Suicide rates are a sign of mental health and social well-being of the population of a country. In 2017 a UNICEF report found New Zealand's youth suicide rate in teenagers from 15-19 to be the highest in a list of 41 OECD and EU Countries. Is this an environment to introduce guns in schools? I think this proposal would exacerbate these problems.

In the 90s the American NRA offered to do gun safety programmes in NZ schools. Phillip Alpers, who led the campaign against this proposal, was able to say then, why would we need this when we do not have guns in our schools? Looking at the NRA record in the US, I suspect they had another agenda. By this proposal to allow guns in our schools, we are moving further towards a gun culture.

Late in my teaching career I saw the end result of a gun culture. I was awarded a Winston Churchill Fellowship to research conflict resolution practices in some primary and secondary schools in Colorado and Texas. All the schools had metal detectors, some had armed police in the playground and two schools in Dallas, one being a primary, had armed police in the corridors of the schools. At the time I wondered how guns in the schools affected the conflict resolution programmes being taught. Now it seems our schools could be in the same position. Are guns in schools compatible with programmes building a more peaceful culture in NZ like restorative justice, conflict resolution and the Peace Foundation's Programmes of peer mediation in primary and secondary schools? Guns are designed to kill! They are the ultimate "quick fix!"

An enlightening example of children's responses to guns in schools was provided last year when the army went into a primary school near Palmerston North with the objective of teaching leadership to 9-13 year olds. Each child got to handle and shoot an unloaded assault weapon as part of the course. One boy said the course was really fun and it would be something imprinted on his brain. An army presenter expressed surprise the children's questions were about the assault rifle and radios not the higher ideas. The purpose of teaching leadership had been subverted by the presence of the gun.

One question I would like answered is, who is driving this guns in schools policy?

I would also like to question your consultation process. I found it very difficult to get information in order to make a submission. As I live in Taupo I rang the local Ministry of Education number and was transferred to the Hamilton Office where I received no information. Later I rang the Ministry in Wellington and again the person who answered could give me no information on draft guidelines for schools developing a firearms policy. I finally got information from the Minister of Education's Office. Have you publicized your proposed guidelines for schools developing a firearms policy so that interested citizens can make submissions?

3

No Board of Trustees has "Carte Blanche" to decide everything in their schools.

Some things require national policies! Guns in schools, is certainly one example!

Recommendations

1 That the period of consultation be extended and the proposal on draft guidelines be publicized so that the democratic process is followed and citizens can have an opportunity to make submissions on the radical changes being put forward for NZ Schools.

2 That more time and resources be given to teaching programmes which will teach students skills to resolve conflict in order to build a more peaceful NZ Society in the future.

3 That no guns or gun storage be allowed in NZ schools.

Yvonne Duncan QSM B.A. [Otago } Dip. Tch

Patron Peace Foundation Aotearoa NZ

From:
To: [Health & Safety Info](#)
Subject: Sub 50 - Fire-arms in schools
Date: Sunday, 8 April 2018 8:17:48 p.m.

The Select Committee re a proposal to allow Arms education in schools

I am utterly opposed to this. When I hear/see the effects of the gun culture in the USA, I am so grateful that I live in New Zealand where guns are not a normal part of the community.

If parents want their children to be involved with guns re hunting or clay pigeon shooting or other marksman sports, then they must join outside Clubs, outside school hours, with their children.

School is not a proper venue for such "education".

From:
To: Health & Safety Info
Subject: Sub 51 - Firearms in Schools
Date: Sunday, 8 April 2018 4:05:25 p.m.

Dear Min of Ed team

I appreciate the opportunity as a NZ citizen to comment on these proposed guidelines. I am a grandmother and hold very seriously the need for every Kiwi to be brought up with a deep understanding of respect and non-violent relationships with the every living species including each other in a spirit of Kaitiakitanga and Manaakitanga. I don't see this as being optimised by allowing guns to be part of the school system.

Would you be willing to take the following into account:

- a. SCHOOLS KEPT AS FIREARMS-FREE ZONES – if training is believed warranted it needs to be done off-site
- b. Any decisions on firearms in schools to be made by an amendment to the Education Act, not left to Boards of Trustees to decide upon.
- c. Inclusion on lead poisoning as a risk
- d. Reference made to the Convention on the Rights of the Child – firearms section
- e. Finally , would also like to see the 'Health and Safety Sector Reference Group' have a name change to make it completely clear that this group comprises many business interests which will benefit financially from increased guns in schools.. Also that NO SPONSORSHIP by firearm manufacturers or associated groups be allowed in schools.

Hei kona mai i roto i nga mihi /Goodbye for now & thank you



"Plastic pollution is a massive and at the same time intensely personal environmental problem... we touch and see plastic every day of our lives. With every trip to the grocery store we can readily see our waste footprint grow. On the bright side, all of us can do something immediate and measurable to reduce it." [David de Rothschild, "Plastik"]

From:
To: [Health & Safety Info](#)
Subject: Sub 52 - Firearms in schools
Date: Sunday, 8 April 2018 1:46:43 p.m.

Government members,

I read with concern the move to make firearms allowable in schools in certain circumstances.

As a retired primary school teacher, mother and grandmother, I submit that there should be NO occasion when guns are allowed in primary schools. We focus on peaceful conflict resolution in our schools and are horrified by the state that schools in USA have got into with the proliferation of guns in that society.

There may be occasions when sport and gun safety are relevant in secondary schools but never in primary and pre school situations.

From:
To: Health & Safety Info
Subject: Sub 53 - Really ?
Date: Sunday, 8 April 2018 8:05:08 a.m.

Ref: A FIREARMS POLICY

Of course we should have a Firearms Policy. It would be a great boost to the economy, All MP's, Teachers, & those in authority should be issued with appropriate weapons for self- defence. It would be of great benefit to the Arms Trade as well as providing further education within the Community together with the backing of a whole new Ministry with a bureaucracy moreover to match. A truly 21st Century advance that would transform our world.

Whangarei

From:
To: [Health & Safety Info](#)
Subject: Sub 54 - RE: Firearms in schools
Date: Saturday, 7 April 2018 5:56:34 p.m.

To whom it may concern:

I read with disbelief that introducing firearms in schools in New Zealand might be a possibility. Do we learn nothing from the terrible events in other countries? Are policy makers ideals and ethics subverted by marketing and purveyors of firearms?

I can not think of any circumstances where this can be a good idea. It is unethical and insane that it is even on the table for discussion.

Schools are safe places for children where they learn and develop into thoughtful citizens - surely our ideal? Would any parent feel safe sending their child to school when other children might have access to firearms, or teachers, or other parents? Keep our educational ideals, keep schools safe and keep guns OUT.

To be honest I thought this was a joke at first, or some naive idea from a Radio Talkback shock jock, how amazing that is is a serious suggestion. Unbelievable.

Regards

*Monash University
Peninsula Campus
McMahons Road
Frankston*

From:
To: [Health & Safety Info](#)
Subject: Sub 55 - Guns in schools
Date: Saturday, 7 April 2018 9:16:25 a.m.

As a parent, and grandmother of 7, and an ex-teacher,
I don't think guns should be allowed in any schools, not even for career days with police , army
etc. I think that glamorises guns.

From:
To: [Health & Safety Info](#)
Subject: Sub 56 - Submission on DRAFT GUIDELINES FOR SCHOOLS DEVELOPING A FIREARMS POLICY
Date: Saturday, 7 April 2018 7:03:34 p.m.

April 7, 2018

To Whom it May Concern,

I understand that submissions are being called for by April 11, 2018 for DRAFT GUIDELINES FOR SCHOOLS DEVELOPING A FIREARMS POLICY

Please take this email as my submission.

My experience in this area is as follows:

I have been involved for nearly 30 years in peacemaking activities mainly in the USA but also in other war-torn countries around the world.

I have had a school age child attend for a year at an apparently highly-rated state US intermediate school near Washington DC.

I have been a volunteer teacher in a decile 1 school in New Zealand for the past five years during times of great stress for the school and community involving much police activity, school lock downs and evacuation of the area's inhabitants.

Before even considering bringing fire arms into schools, the first priority in education for New Zealand government is to teach children proven peace making skills with which to create harmonious community and to respond effectively and supportively in the face of any kind of aggression and intimidation. *Children must understand that weapons will not solve their problems, nor provide protection, nor bring either power, health, safety or enjoyment, but will do the opposite.* Teachers and schools need backup resources for teaching measures to resolve conflict. This confidence in community and individual responsibility and caring is the prime offering of government education. Normalizing firearms in schools for any purpose destroys this confidence. We have an anti-smacking law that is completely incompatible with allowing fire arms in schools. We struggle with violence in the home and do not want to glorify the weapons of violence in schools.

By accepting weapons as normal in schools we must not feed our culture with fear, discrimination and suspicion such as is continuously enabled in the USA. This has had, and is continuing to have, disastrous consequences for many. It diminishes community connection and trust for everyone, and proliferates high ownership and use of guns as we see in recent years in the US when compared to other developed nations. My daughter's experience at school in the US was having her school bag searched on arrival each day for weapons, along with school breaks being very short to prevent children from playing together and getting to know each other; school was a place where children were isolated even from each other and felt threatened every day. New Zealand does not want to, and must not, follow this example.

To counter division and fear, children need, along with peacemaking skills, to be given experience in civic engagement and democratic decision making within the school and local community, and to understand the importance of voting and making submissions within our parliamentary processes. New Zealand's history of diplomacy for enabling peace needs to be taught explicitly along with our espousing of ethical and non-discriminatory relationships internally and internationally, the importance of fostering positive national and international cross-cultural links through families, sport, business, etc. and how we listen to and speak on issues unpopular with powerful nations and groups who may or may not be our allies. Weaponry needs to be discussed only within such a broad and supportive context along with the destructive consequences of using weapons on individuals, families, communities and nations being laid out clearly.

Further responsibilities of Government to prevent the use of violence and to create a safe, interconnected and flourishing New Zealand society include dealing with the urgent issues of livable incomes for all and appropriate job provision and training, accessible education and health care, nourishing food for all children, a humane, rehabilitative justice system, family and child abuse, mental health and suicide, debt, homelessness and affordable healthy homes, rebuilding and protecting vital natural environmental resources, ethnic and gender equity, strong and just international relationships, national sovereignty over what is essential for our well being, and physical and social infrastructure needed to maintain balance amidst unpredictable consequences of global climate change, economic volatility and others' wars. New Zealand has committed to United Nations Agenda 2030 which provides a plan, respectful to both humans and the natural world, to take all this on. New Zealand civil society is waiting to be included in Government's action.

With regard to the specific guidelines proposed for schools to develop policy on firearms—

This issue is of vital importance to our communities; the call for submissions must be promoted widely and the deadline greatly extended.

Boards of Trustees must not have the right {after consulting their communities} to determine a gun policy in their particular school. This is a very serious issue that affects everyone and is much wider than local communities — it requires a nationally agreed policy!

The tools and resources document states that firearms could be used for career days, work experience, ANZAC celebrations and sports. This is completely repugnant and irresponsible! It is in the interest of us all to know who proposed these as permissible reasons to normalize guns in schools? And who in our Parliament and Education Department agreed to the writing of this draft?

The memorial activities on ANZAC Day are to offer gratitude for the beginning of peacemaking after the violent destructiveness of the wars in which we have been involved — to celebrate the end of using weapons. The symbols and actual weapons of violent death and destruction must not be glorified in schools by being exhibited and especially not for young children.

Thank you for considering this submission.

From:
To: [Health & Safety Info](#)
Subject: Sub 57 - Submission for firearms policy for schools
Date: Friday, 6 April 2018 5:44:49 p.m.

Re: Evaluating a Fire-arms Policy for New Zealand

To whom it may concern

There has been very little disclosure about this consultation and it is a hugely important topic which impacts on many aspects of our life and culture

Of course this then ensures there will be opportunity for very few submissions, which seems to suggest a nefarious agenda ???

*This is poor practice and does nothing to encourage a citizen's belief in democratic process and protocol. I would be interested to know how or why this situation has come to be ? **This topic bears wide scrutiny and national, informed debate. Anything less is a total abrogation of responsibility by the authorities involved in this debacle.***

The deadline must be extended and the issue widely explained : and the opportunity for submissions promoted. Decisions of this size and stature require serious and equitable declaration and discussion.

I totally object to the proposed introduction of a policy permitting primary and secondary schools to determine whether or not they would allow their students to have fire-arms in and off the school grounds. This is a hugely backward step and will ensure New Zealand follows in the parlous steps of other, more violent countries.

THERE IS NO REASON NOR RIGHT FOR GUNS TO BE IN SCHOOLS. Even though it appears to be stated guns could be used for career days, work experience, ANZAC Celebrations and Sports THERE IS NO PLACE FOR GUNS IN OUR SCHOOLS. Schools and guns do not go together. It is not an easy nor a reasonable fit : and the policy change to allow guns into schools at any time for any reason, begs for trouble.

We cannot allow the development of a policy to allow individual schools to decide whether or not to allow guns : we should protect the safety of our youngest citizens in all ways at all stages.

Surely, the media's profiling of the murderous use of guns in USA, UK and other overseas schools, together with the marches by shattered students, friends and families, must impact on the minds of all thinking citizens. They stand on high alert, vociferous and passionate SHOUTING demands that kids and guns and schools be kept separate. Without doubt, the logical and actual responses of our citizens when the words 'gun', 'play' and 'school' are conjoined will be marked by incredulity, total disbelief, anger and, for some, horror.

Already our children are avalanched by media representations of violence and killing. Evidence shows the disturbing patterns and attitudes that are emerging ... and this is not the culture we want our kids developing, nor growing up in. Responsible teachers and schools work hard to influence future generations to explore peaceful and non-violent ways of conflict resolution, integration and acceptance of cultural differences : the concept that we each have a right to live our lives peaceably with dignity and respect.

In truth, there is no empirical way of demonstrating that a gun lesson will cause such a violent act. But, equally, we cannot prove that such a lesson will not lead to dangerous violence. Which, then, is the more sensible option?

Having presented these arguments, I then ask : ...

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is there any reason for our authorities to approve the introduction of such a policy? and, who profits ?

It is quite extraordinary to me that this issue or proposal would every be considered as an issue worthy of any consideration.

Obviously the only possible response must to refuse this request.

Bringing the students on board :

There are some important reasons for a discussion with students about the gun culture they observe on a daily basis in our incredibly inter-connected world.

There is a school massacre in USA : minutes later our kids are engrossed watching it unfold on their devices. We must work WITH THEM to assist them in realising the reality and managing the anxiety that this exposure brings to them

Our kids do need to be aware ...

+What procedures should students follow if there were an attack at school?

+What should they do if they become aware of a fellow student acting strangely, threateningly or making overt or veiled threats

+What are the ways to resolve disputes without violence?

+How could they avoid and challenge the gun culture?

In sum: Introducing the weapons of war to our youth is a serious breach of our responsibility as guardians of the next generation. Our role is to protect and empower - to introduce guns into our schools (which should be safe havens) is a gross mistake both ethically and educationally.

As a nation we cannot afford to go down this path. It is wrong. It is indefensible. It is corrupt at its very core.

Sincerely

From:
To: [Health & Safety Info](#)
Subject: Sub 58 - No Guns in schools
Date: Friday, 6 April 2018 5:26:27 p.m.

Minister of Education-Hon Chris Hipkins

Parliament Buildings

Private bag 18041 Wellington 6160

6th April 2018

Dear Minister,

I am writing to you in the hope that you will speak forcefully against the draft guidelines for schools developing a firearms policy in NZ Schools.

Given the media coverage of the tragic use of guns in schools in America, the very suggestion that Boards of Trustees can decide whether or not to allow guns onto school property is outrageous.

Just as NZ can stand tall as a Nuclear Free country, so too, we must stand tall in being free of guns in schools.

There is ample opportunity within NZ society for people to join gun clubs or hunting clubs. There they will learn the safety requirements for the use of guns. Sadly, there are too many hunting "accidents" involving rifles in spite of this training and safety regulations.

To own a gun in NZ you need a gun licence. This is not given lightly and each licence application is researched and investigated. People who want to own a gun have due process to follow to acquire that licence. That's as it should be. Private citizens have that right. Schools do not and never should have the right to own and store guns on school premises. The fact that this is being considered is very disturbing. We know the Gun Lobby (NRA) in America is very strong and influential. I sincerely hope the NZ government isn't being subjected to the gun lobby in this country.

The NZ Ministry of Education must reject any moves towards introducing a gun culture into any schools.

I trust that you as Minister, and therefore the Labour Government, will do the right thing and reject these draft guidelines as inappropriate, non justifiable and totally unacceptable.

Yours sincerely,

From:
To: [Health & Safety Info](#)
Subject: Sub 59 - Firearms
Date: Friday, 6 April 2018 5:08:53 p.m.

I have read and endorse a submission submitted by Dr John Hinchcliffe. I agree with what Dr Hinchcliffe says, and don't think I could express an opinion any better than he does.

However, I wish to endorse one piece from Dr Hinchcliffe's submission as follows: Surely, the media's profiling of murderous gun fire in USA schools, together with the marches by shattered students, friends and families, must impact on the minds of all thinking citizens. As a consequence, the symbolism would hit hard any authority attempting to endorse the gun culture. Without doubt, the logical and actual responses of our citizens when the words 'gun', 'play' and 'school' are conjoined will be marked by incredulity, anger and, for some, horror.

Sent from [Mail](#) for Windows 10

Sporting Shooters Association of New Zealand Inc
PO Box 275
Whangarei 0140
Tel: 09 436 4065
e-mail- ssanzsec@gmail.com

5 April 2028

The Ministry of Education

P O Box 1666

WELLINGTON 6140

enquiries.national@education.govt.nz

To whom it may concern,

Submission on Draft Guidelines for Firearms Policies for Schools

The Sporting Shooters Association of New Zealand (SSANZ) has reviewed the Draft Guidelines for Firearms Policies in Schools and is very happy with the result.

We appreciate that having firearms in schools is a controversial subject and that for some people the thought of this is intolerable. However, we consider by leaving it up to School Boards to tailor a solution that fits with their communities wishes, and then by also having a strong focus on parental permission, the correct balance will be achievable for each school.

The draft that has been completed it is obviously well researched, thorough, and comprehensive. We are sure it will provide a strong basis for boards to develop their policies. We commend those involved in the drafting process.

Due to the high quality of the draft already there are only a few technical points SSANZ would like to bring to your attention and put forward for revision:

Technical issues

Page 7 Auctions involving firearms – the Firearms Dealer does not require endorsements for the type of firearm. A Dealers licence allows for the possession and sale of all types of firearms.

The school staff member sighting the Firearms Dealers licence does not need to have a Firearms Licence themselves.

Page 8 Who can possess different types of firearms, airguns and restricted weapons – this seems to need some clarification. A restricted weapon (which can be a pistol) can be handled by another person under immediate supervision of an appropriately endorsed licence holder. The issue comes in the exclusion of immediate supervision defence for the possession of an MSSA (Military Style Semi-Automatic) which Justice Pankhurst called a “drafting error” in *Lincoln v Commissioner of Police* 2013 para 72 NZHC 1813 2013.

Given the court has identified a drafting error it is very unlikely that a person who was under immediate supervision of an MSSA would be charged with an offence in relation to its supply or possession. Perhaps this could be clarified by Police.

SSANZ would suggest that restricted (collector) firearms (including pistols held as collector weapons) be allowed to be handled under supervision if this is appropriate to the activity and will enhance learning as judged by the board. As correctly noted elsewhere in the draft, all collector firearms are required to be de-activated to prevent firing so there is no chance of an accidental discharge.

So perhaps under restricted weapons it could read: If a restricted weapon is brought to the school for display purposes, it can only be handled by students under the supervision of the endorsed licence holder.

Further to this why have the defence force been excluded from allowing the handling of their firearms during Career day visits? Surely the defence force is excluded from the provisions of the Arms Act 1983 section 3(2)(a)(i) anyway?

Many SSANZ members will remember fondly having the opportunity of a Defence Force visit to their school and being given the chance to, under supervision, handle a firearm. Equally well there are members of SSANZ who are not happy with defence force visits and consider them to be glorifying war and the military.

It is the thinking of SSANZ that this should be a matter for boards and parental consent via a permission letter outlining the activity.

Firearms and the military go together, and in reality, if parents are happy for their kids to be involved in a military career day then it is unlikely they will be concerned about military firearms.

Finally, there has been some media discussion around lead contamination and the dangers to children. While this is a valid concern when actually discharging firearms on a range, there is minimal risk when handling firearms. If the firearms have been cleaned the risk is nearly NIL. Even in a range situation, as long as there is adequate ventilation, handwashing after shooting and no eating or drinking on the range, the risk is easily minimised. And lead exposure is cumulative so is more likely to be problematic due to an extended exposure.

SSANZ suggests making a note with regards these simple risk minimisation factors when live firing is part of the activity.

In closing SSANZ would like to thank the School Trustees Association and Department of Education for considering our submission, and their excellent work on this to date.

Yours sincerely,

Phil Cregeen

Secretary

From:
To: [Health & Safety Info](#)
Subject: Sub 61 - Guns
Date: Monday, 9 April 2018 9:51:19 a.m.

I am opposed any introduction of a policy permitting primary and secondary schools to determine whether or not they would allow their students to have fire-arms in and off the school grounds.

I believe schools should work to create a culture of peace, and promote non violent means of resolving conflict at school and in the community. The presence of weapons with lethal force in the school environment would be in sharp contradiction to all the work the school is doing to promote peace, and end all bullying.

New Zealand is relatively free of the dangerous gun culture that impact so much of the western world. We should strive to keep it that way. A gun in the hands of a respected teacher sends entirely the wrong message.

Sincerely,

The Ministry of Education
 P O Box 1666
 WELLINGTON 6140
 Your email: enquiries.national@education.govt.nz

Dear Sir or Ms,

Draft guidelines for schools developing a firearms policy: feedback on draft

As invited in your documents of March 2018, where you sought feedback on your proposals for guidelines about firearms in schools, I offer the following observations on what seems to be a generally well-prepared document:

- Page 8: under the item “Military style semiautomatic firearms (MSSA)”, the draft text, in the column “Who can handle/possess it”, reference is made to “Only the person who is licensed with the correct endorsement to possess that MSSA unless a permit has been issued.” If you look at Regulation 24 of the Arms Regulations 1992, I think you’ll find that if a suitable person holds a permit to procure such a firearm. They too would be legally able to hold (possess) that MSSA too. (A minor point perhaps, but as you are setting policy with the final version of this document, it may as well be correct in all regards.) In the next column, “Notes” on the same line, the statement is made, “If a MSSA is brought to the school for display purposes, it should not be handled by the students.” Again, the legislation is specific in that only the person so licensed may handle that firearm, (although I am aware of some ensuing legal discussion about the intent of the law.) Accordingly, I recommend the word “should” be replaced with the word “must” because of the current standing of the law. (Only judges can indulge in interpretations of the law.)

Lower down, also on p. 8, is a section dealing with restricted weapons. In the column “Who can handle/possess it”, the statement is incorrect as it is drafted. For restricted weapons, anyone may handle them if they are under the immediate supervision of a suitably licensed (that is, holding the appropriately endorsed licence, in this case a “C” category endorsement). Immediate supervision has been defined as being within arms reach (and able to take physical control of the weapon.) Under the “Notes”, the statement too is incorrect, because under the circumstances I have outlined earlier in this paragraph, handling is lawful and acceptable. Accordingly, the words “should not” need to be replaced with the word “may” to make the sentence legally and grammatically correct.

- I have reservations too about the propriety of allowing imitation firearms to be used in a ‘school theatrical event’, because in such events firearms are extremely rarely used/portrayed in other than threatening or anti-social scenes demonstrating such behaviours, hardly a positive display of lawful firearm use which I am sure schools would rather be promoting.

- Turning now to page 10, I commend the attention devoted to communicating with parents and others of the school community, this in my view is essential for avoiding the alarm and opprobrium which might arise from the involvement of firearms in a school should such communication be absent. In this way I avoided any such concerns while I was undertaking my teaching work for more than two decades.

I notice some adverse comment from some professionals involved in public health matters who believe they were not suitably involved in discussions on these matters (the newspaper headline read “Glaring omission in schools gun-policy group”). As I understood it, some of the draft document on which I am commenting deals with displayed firearms, not those used for the firing of live ammunition. In my view, this is an overstated problem, arising from the presence of combustion materials containing lead vapour when a cartridge is fired, and from the presence of particulate matter commonly found in lead from the projectile. The problem, such as it is (Dr Russell told me it was, “... a mouse in the room...” when I suggested it was a very small elephant” in a telephone conversation with her late in January this year) is easily remedied by the washing of hands upon leaving the firing point and before eating or using the hands for food or confectionery handling. Such a precaution has routinely been observed by specialist teachers using lead-tin soft solder in their technology lessons, for example, at even primary and intermediate schools.

The health people seem aggrieved not to have been involved in these discussions, but I believe (from my own involvement) that this was open for public input from its earliest inception, and the ‘health people’ chose not to become involved. (Perhaps oddly too, I noticed no one from the Ministry of Education attended a seminar held in Wellington on 14 February this year to discuss firearms and public health, but then maybe the invitation did not extend to your ministry?)

Yours faithfully,

(Citizen-taxpayer)

Feedback

Developing Policy on Firearms activities/events involving Students

To: healthandsafety.info@education.govt.nz

From:

Date:

Monday 9 April 2018

Background:

I wish to strongly support that schools be actively involved in promoting the positive and lawful experiences between pupils and firearms – particularly FIREARMS SAFETY and also supporting children wishing to take part in shooting sports – ie target shooting etc.

As a Mountain Safety Council Firearms Instructor, a fully registered and certified Range Safety Officer (RSO) and a HUNTS Instructor with New Zealand Deerstalkers Assn as well as an avid hunter myself, I regularly come in contact with a wide sector of the community wishing to learn about firearms.

As of a large hunting and shooting club (450+ members of all ages), I am submitting this information on behalf of myself but also Thames Valley Deerstalkers Assn. I am the parent of two adult children, I have 4 grandchildren and am heavily involved in promoting firearms safety and firearms use to the entire age spectrum in our community through club activities, personal requests from the public, various groups and organisations, parents and local schools alike.

I am regularly asked by parents who do not hold a firearms licence if I would be able to 'take their child hunting' or 'let their child learn about firearms on the range and have a go at shooting'. Whenever possible I make this happen or I have often changed my original plans to enable this to happen because if there is an interest in firearms, the child/ren NEED to be able to learn the about the 7 Basic Safety Rules and have their interest accommodated in a LEGAL and LAWFUL manner. The other alternative is that they go 'online' and there is an abundance of examples that would make any person's blood run cold at the shocking displays of firearms misuse, abuse and incorrect handling with no hint of the dire and all too sadly; fatal consequences.

I do not gloss over the consequences; I am totally committed to the absolute safety of firearms and the resulting good behaviour and respectfulness of the youngsters is always extremely heartening to see. Children are 'sponges' and we need to make sure please that there are opportunities for them to learn the correct way to behave with or around firearms and to know exactly what to do, should they see otherwise happening. This too is a key aspect of teaching and preparing children for 'life after school' which ultimately is the purpose of schooling.

I fully support:

- That firearms safety instruction and the relevant exposure to firearms be introduced and encouraged in schools
- That schools actively encourage pupils who wish to be involved in shooting sports – be they in school teams (ie clay target teams via an interschool competition etc) or through recognised and affiliated shooting clubs; with the same support as other sporting codes are given. These pupils will most definitely have an increased level of maturity and be excellent role models with regards to Firearms Safety amongst their peers which further supports the Firearms Safety Message in general.
- That opportunities are made available in schools for children to learn first-hand about firearms because at some stage in their lives they may very well come across them and having hands on knowledge on firearms safety may well be a life saver. Even if this is to only know what they should do or who they should report to will be an added bonus.
- That this firearms safety instruction that I am seeking be put in place; **ONLY** be undertaken by someone who holds a current firearms licence (and preferably someone who also holds additional qualifications – ie an instructor or a RSO) and I also only support the introduction of firearms safety within the parameters of an A Category Licence (Airguns and sporting rifles and shotguns). If children wish to learn about those under various other endorsements, they can do this outside of their school environment however the basics taught and learnt under an A Category still apply to all firearms.
- Children (and adults) **NEED** to learn the consequences of what firearms can do if they are not handled correctly. There is no bouncing back on next week's programme as we see on videos and tv etc – this is not reality but it is all too often the only perception that people are exposed to.
 - Watching the behaviour and maturity of children (even only 4-5 years old) who have had exposure to firearms and firearms safety is so heartening to see.
 - They do not attempt to pick them up and play with them
 - They will only handle or take a firearm if it is done correctly, double checked to see it is empty, unloaded and safe
 - The 7 Basic Safety Rules are undertaken without being prompted
 - They understand implicitly that firearms are **NOT A TOY**
 - **Quite simply – they understand**
 - This cannot be learnt from just seeing it on a screen (1).
- My last bullet point above (1) cannot be reiterated enough and this is highlighted by my time as a Firearms Safety Instructor and a RSO. When people have 'read the book' only and come along to sit their licence, it is really obvious. All too many do not have any genuine concept of firearms safety yet others who have been brought up around them; or had exposure to them through a legal licence holder, a club or a sport, are completely different. The results speak for themselves.
- **Firearms Safety is the paramount topic that I am concerned with and this can be taught in the schools under the correct supervision and is an excellent opportunity for the future of this country to be much better informed.**

- An excellent example of this concept of Firearms Safety to those who are not necessarily apply for a firearms license is the Whakatupato Programme that is fully endorsed by the NZ Police. This programme sees qualified instructors go into (usually) remote areas of NZ and teaching Firearms Safety to those communities – ie the entire age range from the young children through to the elders.

Many do not and will not hold a firearms licence but it's about getting the FIREARMS SAFETY MESSAGE ACROSS to all the community and it is working extremely well. Schools could also adopt and promote similar opportunities.

Thank you for taking the time to consider by feedback and should anyone wish to contact me for any further comments or clarification, please feel free to do so.

Firearms Licence Holder

Also:

*Thames Valley Deerstalkers Assn
Mountain Safety Council Instructor
NZDA Range Safety Officer
NZDA Hunter Training Instructor*

From: [Web Channel](#)
To:
Subject: Sub 64 - FW: Regarding submission on guns in NZ schools.....
Date: Monday, 9 April 2018 11:13:39 a.m.

Kia pai to ra
| Senior Web Writer
DDI +

-----Original Message-----

From:
Sent: Saturday, 7 April 2018 8:43 a.m.
To: Web Channel <Web.Channel@education.govt.nz>
Subject: Regarding submission on guns in NZ schools.....

Is this someone's idea of a joke ?

I find this hard to take seriously.

Today is Saturday, 7th April 2018, submissions close in a few days, Wednesday 11th April 2018.
This is the first I have heard of this.
Why has this issue only now come to my attention ?
Publicity has obviously been very poor.

In case this submission is bone fide I add the following statement :
The presence of guns in NZ schools is totally foreign to my values and objectives for schools.
Guns have no place in NZ schools.

From: Web Channel
To:
Subject: Sub 65 - FW: Feedback from education.govt.nz
Date: Monday, 9 April 2018 11:13:12 a.m.

Kia pai to ra

| Senior Web Writer DDI +

From: no reply
Sent: Sunday, 8 April 2018 7:49 p.m.
To: Web Channel <Web.Channel@education.govt.nz>
Subject: Feedback from education.govt.nz

Describe the page or copy and paste the link (URL) to the page

This will help us identify the page you were on:

[https://peace.us1.list-manage.com/track/click?
u=bb0370f54c8f774bba083eed1&id=ab4755010d&e=7b3d53a459](https://peace.us1.list-manage.com/track/click?u=bb0370f54c8f774bba083eed1&id=ab4755010d&e=7b3d53a459)

Your feedback

Please provide your feedback:

Haven't we learnt anything from the USA experience . How dumb are we.

I hope we show wisdom in not allowing ' loaded guns ' - pardon the pun in using a term that has had a clear message in the English language through the generations .

If you would like to be contacted about your feedback please provide a name and email address:

Your email address (if you would like a reply):

4th April, 2018

In re: A Fire-arms Policy

To whom it may concern

I must begin by saying that information about this consultation has been poor. A friend happened to hear of it but could not even glean any information from the Ministry of Education. So, there will be a dearth of submissions. Surely, this is not a good practice in our democracy.

You should extend the deadline and promote widely the call for submissions.

I write to express my profound opposition to the projected introduction of a policy permitting primary and secondary schools to determine whether or not they would allow their students to HAVE fire-arms in and off the school grounds.

'Having' implies using'. The document states they could be used for career days, work experience, ANZAC Celebrations and Sports. I cannot imagine the government would willingly endorse 'using' guns for any of these activities.

There is one exception. I do not believe, without a law change, it would be legally possible to publicly discourage the use of guns by young students if their parents supported them. However, this should be restricted to areas that in no way connect with schools.

I am sure our authorities would not allow an organisation to develop a policy to allow individual schools to decide whether or not to allow:

- +The consumption of whisky so that their students could enjoy all night drinking sessions at the local whisky Club;**
- +Nude sun-bathing that might be physically healthy, socially interesting and psychologically sensible; or**
- +Smoking pot or tobacco that is a friendly and an enjoyable past-time..**

Opponents of these pursuits would call them idiotic. The government would not dare to advertise the right of schools to develop their own policy about such activities. But some of us might consider they are less harmful than allowing students to play with guns in their school grounds.

Surely, the media's profiling of murderous gun fire in USA schools, together with the marches by shattered students, friends and families, must impact on the minds of all thinking citizens. As a consequence, the symbolism would hit hard any authority attempting to endorse the gun culture. Without doubt, the logical and actual responses of our citizens when the words 'gun', 'play' and 'school' are conjoined will be marked by incredulity, anger and, for some, horror.

I was an eighteen year old Regimental Sergeant Major of a large College cadet battalion in the 1950s. We did use rifles but only on rifle ranges and only for

the reason that we might be forced to defend ourselves given the horrors of the recent Second World War still fresh in the minds of our teachers. There was never the slightest thought of play.

From my experience, most people, including war veterans, would NOT believe the memorial activities on ANZAC Days should exhibit the symbols and actual weapons of violent death and destruction. This especially involving the young children. The day is to remember and celebrate the end of having to use guns.

I am not sure what a school would expect to achieve by showing off guns during work experience and career days. It would cause many of us to turn away in disgust.

Any thought of introducing weapons in order to prevent some disturbed student or crazed outsider from committing murderous mayhem is pointless. The time taken to unlock the armoury and load the guns makes such a defence impossible.

Having been in education for all of my professional career, I have another deep concern about introducing dangerous weaponry to young children at an impressionable age.

They seem to be attracted to media full of violence and killing machines. But this profitable madness is objective and 'out there' on the screen. This is not good. But it is not an existentialist, subjective and personally engaging experience. When a teacher, respected by the children, speaks positively in their classroom about weaponry, the impact on the student is different. They usually listen....and far more likely to believe.

*+What would they learn as being the purpose of the gun? Would any such instruction not encourage them to use such a weapon more readily?
+How can we teach them that weapons will not solve their problems nor provide protection nor bring enjoyment?
+Are we teaching about New Zealand's significant engagement in peaceful actions?*

Surely, responsible teachers who so directly influence the future generations would prefer to encourage their students to explore the peaceful and non-violent ways of conflict resolution such as offered by the Peace Foundation.

If a student from a class that has had instruction in the use of deadly weaponry does commit an act of violence with a gun, then who would be to blame? Probably, it would be the Principal of the School and the Board of Governors. The purveyors and profiteers of gun violence would be absent.

There is no empirical way of demonstrating that a gun lesson will cause such a violent act. But, equally, we cannot prove that such a lesson will not lead to dangerous violence. Which, then, is the more sensible option?

I have another concern. With 3D manufacturing, we could build guns in our home workshop. This is a most worrying development. We can no longer discuss the gun culture as being an extra-ordinary phenomenon. Unless proscribed, guns will become even more common-place. The passion for a peaceful and non-violent culture will become so much more difficult

So, what could be a good reason for our authorities to approve the introduction of such a policy? I would have thought it would never be raised as an issue worthy of any consideration. The only possible response must to refuse this request.

There are some important reasons for a discussion with students about the gun culture. These relate to the following.

- +What procedures should students follow if there were an attack by murderer in the school?*
- +What should they do if they become aware of a fellow student acting strangely or with a sense of suppressed anger or hatred.*
- +What are the ways to resolve disputes without violence?*
- +How could they avoid and challenge the gun culture?*

In sum: Introducing the weapons of war to our youth is a serious mistake both ethically and educationally. My initial soundings from friends clearly manifest incredulity and hostility this unusual proposal.

John Hinchcliff MA (Hons), PhD, Hon D, CNZM and Vice Chancellor Emeritus of Auckland University of Technology

Endorsed by:

*+Rev. Jon Winder MA (Hons), Dip. Ed, Coach and Facilitator in Education
30 years teaching
23 years as an international consultant in education.*

*+Rev. Marama Winder BSc (Hons)
Former National Vice President of United Nations Assoc. of NZ
Education Consultant*

From:
To: [Health & Safety Info](#)
Subject: Sub 67 - FW: Feedback from education.govt.nz
Date: Monday, 9 April 2018 12:15:50 p.m.

Kia pai to ra

| Senior Web Writer DDI

From: no reply
Sent: Friday, 6 April 2018 6:47 p.m.
To: Web Channel <Web.Channel@education.govt.nz>
Subject: Feedback from education.govt.nz

**Describe the page or copy and paste the link (URL) to the page
This will help us identify the page you were on:**

www.education.govt.nz

Your feedback

Please provide your feedback:

I am very much opposed to allow guns in schools. There is no need. If parents find it necessary for their children to learn how to use firearms, they can go to private recognised and state controlled institutions and pay for the tuition.
It is not in the interest of the general population that kids are taught to use weapons.
It is not the Wild West here.

If you would like to be contacted about your feedback please provide a name and email address:

Your email address (if you would like a reply):

From:
To: [Health & Safety Info](#)
Subject: Sub 68 - Policy against guns in schools.
Date: Monday, 9 April 2018 11:46:13 a.m.

Thank you for the opportunity to comment on MoE's draft policy on gun in schools.

My strongly held views are :

1. There should be no guns in schools. Full stop.
2. MoE must set MoE policy ensure that School Board do NOT have the authority to allow guns in schools or to allow the promotion of guns, or the promotion of careers that use guns.
It is not the role of schools or MoE to educate children in the use of guns or in the killing of animals or people.
Army and police career promoters bring the guns in order to inappropriately glamorise their roles in young minds. Guns and gun violence should not be glamorised by male role models.
3. Total exclusion of guns from schools should be added to gun law legislation by which government department is responsible for this.
4. The exception of gun use in schools by pest eradication professionals is nonsense. Multiple use traps are a more effective and more human way of killing possums, and much more appropriate in populated areas.
5. Gun use is restricted to licensed adults by law. Education in the safe use of guns should be required as part of gun licence application by adults and provided by a licensed gun use/gun law educator (who can also verify locked cabinet requirements, etc.)
6. Any temporary possession and use of guns by under-18s should be only in the presence of and under the supervision of their parent or guardian. It should be an offence subject to a fine for any non-parent/non-guardian to supply a gun to a minor. On the model of the Sale of Liquor Act.
7. There should be no licensing of semi-automatic weapons in NZ in any hands except the armed forces'. There is no possible use or justification for them.

From:
To: Health & Safety Info
Subject: Sub 69 - A firearms policy for schools
Date: Monday, 9 April 2018 10:01:55 p.m.

To whom it may concern

I wish to submit my thoughts regarding a firearms policy for schools.

1. Such an important matter should have had wide publicity and consultations. Instead of which it gives the appearance of a closely guarded secret as most people I know have been completely unaware of it. I too became aware of the consultation only this last weekend.
2. I agree that there needs to be a policy for certain limited events when guns may have to be brought on site such as pest control. However I do not believe that schools should be organising gun related activities for students.
3. We hear of so many instances of guns being used in schools in the USA that we should do our utmost to dissuade gun usage except where absolutely necessary. Schools should set the example in this regard and actively work to discourage the possession and use of guns.
4. All gun related activities should be done offsite and under the supervision of the relevant authorised body such as a gun club and parents. The school should not take part in such activities but educate students on the law and the need for restrictions on gun usage.

Submission on the Draft guidelines for schools developing a firearms policy

I submit that there is no place for guns in our schools.

Guns were invented to kill or injure living creatures and their main purpose is still that. They are not civilised pieces of equipment and should not be normalised to children and young people, particularly in their educational institutions. We do not allow poisons to be handled in schools, except as part of science experiments - and I'm sure that the presence of guns can't be justified by their being used in science experiments!

Firearm owner lobbies are very vocal – do we want to end up with our own NRA with the same power here as it does in the States? I was interested to see that there were 18 representatives of firearms' owners on the panel but no public health experts. Please don't risk the gun lobby influencing this issue – it's too important. The more we normalise guns the more we risk heading down the USA's path of gun ownership and gun lobby power and influence and the more likely we are to end up with school shootings occurring. We have seen what happens in America when so many firearms are in circulation and we shouldn't encourage any more gun ownership in New Zealand Aotearoa.

There is no place for 9 – 13 year olds to be handling semi-automatic weapons in their place of education or to undergo any activities that glamourise firearms. And to teach pre-schoolers about handling guns is just crazy and should not be happening.

Guns, like alcohol, are not acceptable in the hands of young people. Allowing guns in schools sends an adult-centred message that guns are ok. I don't believe there is any necessity for children and young people to have guns in their schools.

Consultation on the Draft Guidelines for Schools developing a firearms policy

(Opened by the Ministry of Education on Monday 5 March 2018 (closing on Wednesday 11 April 2018))

I make this **SUBMISSION** as an ordinary citizen with a concern about this issue. I became aware of this consultation three days ago, less than a week before the closing date. There seems to have been little general notification of the issue, together with little time to respond. My reading of the documents suggests that School Boards of Trustees have been the only targets of this consultation, with the request that it be discussed by Boards and their school communities. I fail to see how even this limited consultation could be satisfactorily completed within the time. I submit that this is a matter of wide public concern, particularly in the light of the deadly firearms events in American schools, and that adequate opportunity should be given for members of the public to offer submissions.

I therefore submit that the closure deadline be extended and that measures be taken to make this consultation more widely known. I believe that there should be a national policy rather than it being decided by individual Boards of Trustees.

It is stated that "Boards of Trustees have authority to allow the supervised presence and use of firearms on school premises following consultation with their local school community". It is difficult to identify what is categorically disallowed. I can find nothing in the consultation documents that actually forbids live firing exercises on school property. The suggested "Tools" in the accompanying document might appear to be more restrictive, but these are emphasised to be for Board guidance only.

Boards of Trustees have authority to design and shape their own school curriculum, but the consultation document cautions them: "If you do want curriculum-related firearms activities on school sites, your policy should explain when and what type of firearms/airguns will be available and at what kinds of events ". I ask: Why should firearms be a part of the curriculum at all? Among situations cited where firearms may be allowed in schools are "Sponsorship", "Career Days", "Auctions involving firearms", "Defence Force Visits", and "Fundraising". Elsewhere it is stated that "If a MSSA (Military style automatic firearm) or a restricted weapon (See Arms Order 1984) is brought to school for display purposes, it should not be handled by the students".

The message of this Consultation document seems to be that as long as the requirements of the Arms Act 1983 and Arms Regulations 1992 are met, firearms in schools can be quite OK! I find this normalisation of the guns in schools problem to be quite repugnant, and I am sure that I am not alone in this.

9th April, 2018

From:
To: [Health & Safety Info](#)
Subject: Sub 72 - Guns and/or gun education in schools
Date: Monday, 9 April 2018 5:43:57 p.m.

Dear Sir/Madam

I am strongly opposed to any programme of gun instruction in schools, at any level.

This proposal is part of an insidious process deliberately designed to normalise the handling and use of firearms, particularly by those with no previous such experience.

It is usually dressed up as being about safety, particularly for those children who live in gun-owning households, but given that most New Zealand children do not live in such circumstances, and may have had absolutely no direct exposure to firearms, the result of this programme if adopted in our schools will be to increase exposure to weapons and make them seem cool and just part of normal life for very impressionable young souls.

Many years ago (in the early 90s) I was a founding member with (name redacted) of a group called **Gunsafe** whose prime mission was to campaign against moves to increase access to guns and decrease gun controls, particularly a campaign being run by the Sporting Shooters Association (largely inspired by the infamous National Rifle Association). We did try very hard over several years to get the government to implement dual licensing of both privately owned weapons and shooters but were always "outgunned" as it were by the pro-gun lobby, with support from the NRA and local gun retailers. The net result was that Governments have wimped out on this issue and now we have about 2 million guns in circulation with no accurate idea about who has them.

One of the SSA's nastiest campaigns was an attempt in about 1991-92 to introduce the NRA's Eddie the Eagle programme into New Zealand Schools which would have had effects well outside the school gates - changing popular attitudes towards the ownership and use of firearms by ordinary kiwis and their families - most of whom manage to live their lives without any access or exposure to guns of any sort. This is something to be valued and protected in our kiwi lifestyle. Eddie the Eagle was the iconic cartoon character for the programme, designed to appeal to kids and get them to adopt various pro-gun messages. Gunsafe wrote to every school in New Zealand + education groups warning them about Eddie the Eagle and were successfully able to almost completely blunt the SSA's initiative - in the end only two schools signed up - both of which were rural high schools with a long history of operating quasi-military cadet training schemes dating back a century or so (which most other schools had long since phased out).

There should be no guns in our schools whatsoever. If there are some communities where gun use is already pervasive and which particularly want to run gun safety courses then let them organise such activities amongst themselves with help from the Mountain Safety Council or similar, but please not in our schools.

Yours faithfully

Ph.

From:
To: [Health & Safety Info](#)
Subject: Sub 73 - Firearms in Schools - submission
Date: Tuesday, 10 April 2018 8:44:15 a.m.

Submission on draft guidelines for schools developing policies on firearms in schools

Background

I am the parent of two (now adult) children who attended state and integrated schools in New Zealand between 1988 and 2005. I was a member of my children's primary school Board of Trustees for some years. I have advocated successfully for law change in areas connected to violence against children.

I am writing this submission because in 2017, I saw a news item in which young school children aged between 9 and 13 were given the chance to handle unloaded military weapons during a school visit by members of the Defence force. The apparent reason for bringing firearms to school was "leadership training" visit. I find this concept of leadership training rather mystifying, to put it mildly.

I acknowledge that New Zealand has a high rate of gun ownership per head of population and that we have been fortunate not to have experienced the level of gun crime as in countries such as the USA. This may be partly because of the legislation on guns controls. We soften that stance at great risk.

Firearms

A working firearm's only purpose is to cause damage, injury or death- to objects, animals or people. It is an inherently dangerous object and the state in New Zealand has recognised the threat a firearm poses by creating legislation in an endeavour to minimise the risk of harm.

This submission has two main points:

- a) Board of Trustees should not be given the responsibility to make their own policy on this very challenging matter – it should be a matter for central government direction
- b) Whoever makes the policy, "firearms in schools" should be the exception, for very specific reasons and not in any way normalised.

A) Board of Trustees not to have any responsibility for making policy on firearms in Schools

Boards of trustees are made up of people from a wide variety of backgrounds. They are not professional policymakers and in my view, they should not be placed in the position of having to sift through the complexities of law around firearms in order to make policy that will keep children safe.

I submit that the government has the responsibility to make policy that is applicable to all schools.

B) What should the central government policy be?

I submit that the policy should start from the standpoint that **no school in New Zealand should allow any type firearm on its premises with only very specific exceptions**. It is then necessary to work out the exceptions.

Exceptions to a "No firearms in schools" policy:

All Schools

- Police dealing with an incident involving an alleged armed offender
- Pest control on school grounds under strictly controlled circumstances when no children are present

Secondary Schools

- imitation firearms used in School-approved theatrical productions

All other school-related firearm activity (gun clubs, clay pigeon shooting, Cadets, auctions of firearms etc) to take place on premises other than schools.

regards

From:
To: [Health & Safety Info](#)
Subject: Sub 74 - Submission regarding the use of weapons in schools
Date: Tuesday, 10 April 2018 11:44:29 p.m.

Honourable members of the committee,

We the undersigned put forward the following points to the committee for consideration:

I: Normalising the use of weapons in a school environment is unacceptable

When all is said and done, a weapon is a tool designed to maim or kill humans or destroy property. There are certain very rare and regrettable situations where the use of weapons is in principle necessary, but this should be seen as a regrettable decision that should be approached with due gravity and never treated as being normal.

With that in mind, the introduction of weapons into a school environment is a priori unacceptable. A school is an environment where student ideas of what is and is not a normal part of society are in large part developed. Introducing military personnel or armed police into school environments and demonstrating the use of weapons in such a context thus sends a strong signal that it is normal for certain groups of people to be prepared to kill or wound other humans on a permanent basis. This in turn normalises killing and de - emphasises its gravity, which is not something that should be taught in schools or, in point of fact, anywhere.

II: Military or quasi - military education has no place in schools

Further to this, the purpose of schools is to produce competent, independent - minded citizens able to exercise their rights and responsibilities as such. This is antithetical to the ethos of the military or the police, which tends to emphasise obedience to authority, a strict hierarchy and conformity to a set of highly conventional social norms. Teaching children to adhere to such an ethos in a school environment through cadet programs, pre - services academies and similar structures thus defeats the purpose of our educational system and teaches people authoritarian attitudes that endanger the proper function of our liberal society.

III: A clear national policy prohibiting the presence of guns in schools is required

As it has been comprehensively shown that the presence of weapons and the military in schools a clear national policy prohibiting weapons and military involvement in schools is needed. This should be worded so as to exclude any firearms or military personnel from being on school property in an educational capacity.

Sincerely,

Auckland Peace Action

Submission on Draft Guidelines for Firearms Policy for Schools

I am making this submission as a private citizen concerned about the existence of these guidelines and about the short period of time allowed for consultation on them as well as the limited public notification of this document.

Firstly and fundamentally I believe that firearms have no place in schools. Suggesting that there might be valid reasons for having them there in any way legitimises their presence and teaches children that they are a normal part of adult life and that it is accepted that problems and differences between individuals, groups and states need to be solved by force of arms.

History shows that negotiation and engagement are the most effective and durable ways to address conflict and warfare, and the use of weapons only exacerbates tension and leads to unnecessary suffering, mental and physical, and loss of life – both amongst aggressors and those who are attacked and their families. This is the message that should be passed to children, and the sanctioned presence of weapons, even with safeguards, denies this truth. Military activities in schools is also contrary to the aims of education as specified in the UN Convention on the Rights of the Child (Article 29), and in the Committee on the Rights of the Child comment No 1 as the teaching and learning of basic skills and life skills such as the ability to resolve conflicts in a non violent way.

Apart from armed conflict the uses of firearms in civil society for hunting or sport or pest control are mentioned. Young adults who wish to take part in hunting activities can be provided for outside the school environment and the use of weapons for sport gives children the dangerous message that use of weapons is harmless fun and therefore should not take place on school property. If firearms are necessary for pest control this activity can take place while children are not present and with appropriate safeguards.

Furthermore it should not be up to Boards of Trustees to make decisions on an issue which is a health and safety one. There should be national guidelines after wide consultation and advice from human rights and health experts.

I hope that these guidelines are withdrawn and that, for all the above reasons, there will be nation-wide regulation through Policy Guidelines or an amendment to the Education Act 1989, to prohibit the unnecessary and pernicious presence of firearms on school property.

10 April 2018

My contact details are in the email to which this submission is attached.

To: The Firearm guidelines for school policy Sector Reference Group

Subject: Submission on draft firearm guidelines for schools

Submitter:

Personal Introduction:

I am a 68 year old retired civil engineer, with over 50 years roading experience directly related to safety, with particular expertise on road safety auditing, reviewing fatal crash sites and their possible causes, as well as a Road Safety Co-ordinator for three district councils, involved in all facets of road safety with the public, Police, ACC, District Health Boards, schools, etc.

I also had 15 years as a Local Authority Councillor, where public safety is a key factor, as well as several years as a an Alternate Civil Defence Controller, a Deputy Principal Rural Fire Officer and Planning Hearing Commissioner, frequently as Chairperson.

In terms of experience more closely aligned to the submission subject, I was involved, for several years, as both a Primary School Committee member and Chairman and as Chairman of the Board of Trustees, when they were first introduced.

In terms of firearm experience, I had my first firearm lesson, with a single shot bolt action 0.22 rifle, at the age of about seven, as my father was a devout believer of firearm safety. I have had a number of rifles and shotguns since the age of 18 years and belonged to an outdoors rifle and pistol club for a number of years. While, in my earlier years, I went duck and rabbit shooting, most of my time was on target shooting, using a wide range of guns, including pistols and black powder.

I have a number of grand children at Day Care, Primary, Intermediate and Secondary Schools, my wife assisting, as a volunteer in some school activities. My daughter in law is a teacher as well as a mother of two primary school age girls.

A number of our grandchildren have, at their respective schools, had tuition on firearms, utilising slug guns/air rifles. Some have also had training in archery.

On a final note, I have a son who was an Air Force Cadet for a few years, with firearm training being a key activity, and he also, as well as my stepson, joined the Regular Army for a time, my son now being in the Territorial Army.

With both my parents being in the armed forces during the Second World War, my own interest in military history, and the above information, I have significant experience of the use of firearms and public safety.

Comments on events leading up to the submission:

On reviewing a large number of newspaper articles, the general theme appeared to be a complete ban on guns in schools, except in emergency situations where armed Police may be required on school grounds.

It is difficult to identify whether the concern about firearms are as a result of some, especially new, parents having different ideas of what schools should be involved in, or the very high profile of firearm attacks in American schools, as it is important to be aware of the different factors in play, particularly as the concerns do not appear to come from within the schools themselves.

While nobody can claim that the school shootings in the USA will or will not occur in New Zealand, these incidents are probably less likely and the banning of firearms in schools is not going to prevent this possibility.

It makes more sense to familiarise children in the safe use of firearms at an early age, and to educate their parents on the safe use of firearms and that firearms are kept in secure locations, as per the arms code.

The issue of lead poisoning from bullets has also been raised, but this could be mitigated by target bunker design, and it should be noted that there is a move to steel shot for shotguns.

With this in mind, it is also important to compare this risk with other more prevalent and serious risks, such as fumes and particulate from vehicle engine emissions, particularly with the significant numbers of parents taking their children to and from school, drop offs usually being immediately adjacent or within the school grounds. This does not include the same risk from passing vehicles on the road in front of the school. There is no move to ban vehicles from or around school grounds.

Defence Forces:

Whether one believes in guns, or not, it is essential that the country has a Defence Force and Law agencies to provide a degree of security, and responsibility to assist other countries, if required, particularly in the current uneasy world environment.

New Zealand was able to activate relatively quickly for the Second World War, as a significant number of people were already partially trained, through College Cadets and the then National Military Training, if your name was drawn in the ballot.

We have neither now, except the Territorials, and it is beneficial for the country, and safer for the individual and public, that people have, as a minimum, an understanding of firearm safety.

By refusing Defence Force personal, with their weapons, on school properties almost demonises the service men/women and will likely have a negative effect on recruitment in the future, as well as the morale of the service personnel, particularly as they may perceive that they are not valued by society as a whole.

We should be proud of our armed forces, especially for what they have protected us from the past, and likely to continue that tradition into the future.

Comments on the submission process:

It is noted that the submission specifically requires comment on the draft guidelines, with no mention of whether guns should be allowed in schools.

The two issues are mutually inclusive; particularly when two Education Ministers, Nikki Kaye and Chris Hipkins, are reported as stating that, in their opinion, guns should not be allowed in schools.

Both the Labour and Green Parties, prior to the 2017 election, were also reported as wanting a ban on schools to be implemented.

My concern is further increased by a statement in the "request for feedback" that there has been considerable debate on the appropriateness of firearms being brought into schools. I follow government issues very closely and have only just seen open interest in the subject, particularly as it was first raised by Nikki Kaye, then the National Education Minister, in June 2017, with an expectation that guidelines be drawn up in 3 – 4 months, immediately prior to the 2017 election.

The firearms in schools issue appears, in my view, to be part of a larger ideology, at a political level, to try and remove all aspects of guns from public view, and reinforced by the recent Defence Force statement that they will not now have firing parties at events such as ANZAC Day commemorations.

The reason given by the Defence Force being that firing parties are a legacy of post First World War ANZAC Day services, when the occasions were funereal in nature. Further to that, Police statements that it could incite a stampede if someone, in a large crowd, yells gun. This could suggest, but has not been verified, that the usual Catafalque Party, consisting of either soldiers or cadets, who stand around the cenotaph, will not be allowed to bring their rifles.

It could also be said that no vehicles should be in the vicinity, for the same reason as guns, incite a stampede similar to that which occurred in Australia and Europe, where terrorists used trucks or cars to maim and kill members of the public.

I am heartened, however, by the well worded media release from the School Trustees Association, on 5 March 2018 (refer page 16), particularly the reference to a well-rounded education, suited to local circumstances, including outdoor recreation pursuits and careers in the armed services. Also mentioned, was that they didn't want to wrap their kids in cotton wool, but to make sure that all reasonably practicable steps are taken to keep them safe.

It is important that the three parties in the Coalition Labour Government, as well as the opposition parties, clearly state publically where they individually stand on the issue of a ban on guns in school or not, and whether there is a degree of subterfuge in the submission process, especially if there is a strong majority of submissions that have included their desire to have a complete ban on guns in schools.

If the submission process was used for any other purpose than that publicly stated, as outlined in the previous paragraph, it could seriously erode the credibility of future submissions on any subject.

For the record, I have included my desire that the submissions process be correctly followed but, in the case of misuse, that I strongly support the instigation of the guidelines for schools to develop a firearms policy, subject to the wording being very clear and transparent and with no bias in the direction of a ban.

I also see little harm in firearms being taken onto school grounds, as long as they are closely supervised by competent authorised personnel, all practicable safety measures taken and parents notified in advance.

Submission on the draft guidelines for schools developing a firearms policy:

General:

New Zealand has a large number of guns, per capita, so children, especially rural town and country children have a high exposure to guns, and thus safety and understanding of guns is critical for their own, and others, safety.

In my time as Chairman of the Board of Trustees, I invited the Army to have a display at the school fundraising events, and these were always popular with both children and their fathers. I do remember a parent being horrified at the Army being on the school grounds during one fundraising event, but that was the only one that I can recollect.

There were a few parents that did not allow their children to play with toy guns at their homes, but it was interesting to observe their behaviour when playing at the homes of children who were allowed toy guns. They enjoyed the guns but their actions were exaggerated, similar to that of children who are not allowed sweets at home, but gorge themselves at somebody else's place.

Clarity as to terminology Firearms/Weapons:

While most of the newspaper articles used the term firearm, there was occasional mention of weapons, which has more far reaching repercussions, as it is very broad, possibly relating to knives, archery, historical/cultural weapons, etc., the latter being openly encouraged, especially in Northland.

Archery and gun clubs are activities that are offered in a number of schools, especially secondary schools, and a number of Primary Schools have training in the use of slug guns/air rifles at school camps.

It is important, especially for legislation, that it is very clear and precise as to what is being considered by the Government, e.g. are the guns themselves being banned, or the actual firing of them.

Draft Guidelines for schools developing a firearms policy:

The concept of a School Firearms policy is to be welcomed, to ensure that safe practices are used, but the rules must not be so onerous that some schools, particularly small schools, may find it difficult to find a

staff member with a Firearms Licence, and the individual's responsibilities must also be realistic and clearly outlined.

There are also a few minor issues that should be addressed to ensure compliance with relevant Acts and Regulations, being as outlined in red font on pages from the Draft Guidelines below:



Introduction



Schools, parents/caregivers and their communities will have differing views regarding firearms in schools. Some parents/caregivers will oppose the presence and use of firearms in schools. Others are often happy with their safe handling in an educational environment or for firearm safety purposes with strict restrictions and policies on their use.

The New Zealand School Trustees Association and the Ministry of Education understands there are differing opinions on schools allowing students to participate in activities involving firearms. While we do not support the unsupervised access of firearms in schools, we do acknowledge that there are legitimate circumstances where firearms may be part of students' education or a sporting activity.

Boards of trustees have authority to design and shape their own school curriculum and policies to best meet the needs of their students and communities. This is underpinned by the principles of the New Zealand Curriculum and Te Marautanga o Aotearoa.

Boards of trustees have authority to allow the supervised presence and use of firearms on school premises following consultation with their local school community. Boards must ensure they meet all the requirements of the Arms Act 1983 and Arms Regulations 1992. should include other Acts, such as the Defence Act, refer comments on page 5

Schools are a core part of our community and social structure and are important settings for promoting health and wellbeing through education, policies and modelling best behaviour.

The following guidance is for boards of trustees when developing a policy involving activities on and off school grounds where students are interacting in some way with firearms. The guidance will also clarify what needs to be considered when drafting a school firearms policy. It is ultimately the board of trustees who will decide on what the firearms policy for their school will look like, in consultation with their communities and within the legal obligations of the Arms Act 1983 and associated regulations.

These guidelines will help you:

- » clarify the situations when firearms are permitted in schools
- » outline processes that a board must follow
- » provide information for boards to consider when reviewing or developing a school policy on firearms.

Boards should use this guide to support them in their decision making process.

Important: If your school does not intend to allow firearms for educational purposes, a policy is not needed. You may however like to update your general school policies to reflect this stance.

These guidelines are based on the following principles:

Principle 1: All schools are required to provide a lawful and safe physical and emotional environment for students and staff. A safe and lawful environment for students and staff is of paramount importance and therefore must be the primary concern when applying the guidelines.

Principle 2: Parents/caregivers, students and the public will have a valid expectation that schools will develop a written policy and procedures to cover circumstances where students are involved in activities relating to firearms and that they will advise parents/caregivers accordingly. Schools must be mindful of these expectations.

a policy should be required regardless of whether the school intends to allow firearms or not, to provide transparency in the decision making by the BOT, particularly as to how they reached their decision and who they consulted with. The concept of no firearms by a BOT may simply be a reflection of their own opinions without consulting their community, or simply an easy way out to avoid the bother.

care also needs to be on the use of firearms for educational purposes, particularly as it should apply to career opportunities, school fundraising events, training in the safe use of firearms, etc.

the term emotional environment is a very loose and dangerous requirement, particularly as virtually every person, of any age, can have many different interpretations, eg. the performance of the haka may, to some people, especially young children, be very threatening.



Legislation



Legal framework for firearms in schools

The Arms Act 1983 and Arms Regulations 1992 apply to everyone in New Zealand. This includes all schools (and school related activities, both on and off school sites) all school staff, students, visitors, displays of firearms and civil/emergency incidents. Legal restrictions involving various firearms are detailed below:

Firearms

It is an offence for anyone to **possess** a firearm unless they are:

- » 16 years of age or older; and
- » the holder of a firearms licence.

There is a defence to prosecution for this offence if:

- » that firearm was in that person's possession for use under the immediate supervision of the holder of a firearms licence; and
- » at all times while that person was in possession of the firearm, they were under the immediate supervision of a firearms licence holder.

See page 8 for more on what 'immediate supervision' means in practice.

It is an offence to **sell** or **supply** a firearm to any person who is not the holder of a firearms licence or dealers licence or a permit to import. There is also a defence to prosecution for this offence where the "immediate supervision" scenario applies.

care required when using the firearms licence as the absolute requirement as, to the best of my knowledge, Armed forces operate under the Defence & Arms Acts & Regulations and personnel may not have individual firearms licences. I am not sure about the Police, in terms of personnel having individual firearms licences.

Airguns

It is an offence for anyone to **possess** an airgun unless they are:

- » 18 years of age or older; or
- » **aged between 16 and 18** years of age and are the holder of a firearms licence.

There is a defence to prosecution for this offence if:

- » that airgun was in that person's possession for use under the immediate supervision of either a person of or over the age of 18 years or the holder of a firearms licence; and
- » at all times while that person was in possession of the airgun, they were under the immediate supervision of either a person of or over the age of 18 years or the holder of a firearms licence.

See page 8 for more on what 'immediate supervision' means in practice.

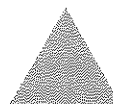
This defence does not apply to "specially dangerous airguns", which are treated as firearms under the Arms Act 1983.

It is an offence to **sell** or **supply** an airgun to a person who is under the age of 18 years and is not the holder of a firearms licence. There is also a defence to prosecution for this offence where the 'immediate supervision' scenario applies.

Pistols, military style semiautomatic firearms and restricted weapons

There are additional legal requirements for pistols, military style semiautomatic firearms and restricted weapons. For example, in a civilian context:

- » pistols may only be used on the range of an incorporated pistol club range recognised by the Commissioner of Police
- » restricted weapons (such as automatic firearms) must be maintained in an inoperable condition and are generally only held by the Defence Force, collectors, museums or for theatrical purposes.



Definition of a firearm

The Arms Act 1983 defines a firearm as anything from which any shot, bullet, missile or other projectile can be discharged by force of explosive. It includes anything that has been adapted so that it can discharge any shot, bullet, missile or other projectile by force of explosive.

It also includes anything that for the time being is not capable of discharging any shot, bullet, missile or other projectile by force of explosive, but which by its completion or repair would be capable of doing so.

Key consideration: What sort of ^{and why the} firearm is coming into the school and are there any restrictions on this type of firearm?

refer page 5 comments, re the Defence & Arms Acts & Regulations, etc. for Armed Services personnel, Police, etc.

Every firearms licence is subject to conditions relating to the security precautions that are required to be met by the holder of the licence. These are contained in Regulation 19 of the Arms Regulations 1992 and apply if firearms are stored or transported.

When it might be legitimate to allow student involvement with firearms

There are a range of circumstances where boards might choose to allow firearms onto their premises, or have students involved with firearms outside school premises — such as for careers days, work experience and Anzac Day celebrations. Some schools, more likely to be secondary, may operate a gun club that uses a local shooting range. The Board may allow the presence or storage of firearms for this purpose. These schools may also participate in inter-school shooting competitions.

It is up to each board to consider if firearms will be allowed on their premises and to define the circumstances in which they might allow their students to participate in activities involving firearms. The policies and procedures surrounding firearms on school premises will be unique to each school and while a policy will endeavour to cover most situations, there are likely to be 'one off' situations that will not be clear cut. If this occurs, the principles and rules for other situations can hopefully be applied. See Tool 3: Example policy/procedure for the safe use and storage of firearms.

Schools will need to ensure they meet their obligations under the Arms Act 1983, Arms Regulations 1992 and Health and Safety at Work Act 2015 at all times. refer comments on Defence Act on page 5

The table below outlines the limited instances identified by school representatives on the Health and Safety Sector Reference Group where firearms may be permitted on school premises, under strict supervision:

Situation when firearms may be allowed in school	What type of firearm	What requirements must be met? (some examples included)
EOTC events such as clay target shooting and controlled activities on school camps	Category A firearms (sporting shotguns and rifles) and airguns	Whether a firearm or a airgun if the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling a firearm or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.
Firearms safety course	Category A and airguns	If the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling firearms or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.

Situation when firearms may be allowed in school	What type of firearm	What requirements must be met? (some examples included)
Sponsorship	Nil	What does the school allow in terms of sponsorship by businesses/ organisations involving firearms.
Career day	Category A and airguns	Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and schools policies and procedures.
Defence force visits	except under immediate supervision	No student, parent/caregiver, volunteer or staff member may hold/ possess a restricted firearm during Defence Force visit.
Auctions involving firearms (The dealer must have the correct licences and endorsements for the type of firearm.)	All firearms	A school staff member who is a firearms licence holder needs to sight the dealers firearms licence (Local Arms Officer can help with this).
School gun club	Storage of Category A and airguns	Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.
Pest control	Category A and airguns	Destruction of pest animals such as rabbits, possums or magpies by pest control professionals outside of school hours
Inter-school shooting competitions	Category A (or if at pistol club)	Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.
Hostels	Storage of Category A and airguns	Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures
Legally transported firearms why not during an event hosted at school?	Category A firearms	Firearms which are being transported for use elsewhere and remain in the vehicle under the immediate supervision of the licence holder at all time. Defence Force personnel firearms are for show only, but could be held by students under one on one supervision
Fundraising (Offsite event, but start/end of event hosted at school)	Storage of Category A and airguns	Pig hunt, rabbit hunt, possum hunt. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.
Amusement devices	Air and pellet guns	School fairs (eg fixed pellet guns for shooting metal bunnies/ducks). Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.
Imitation firearms (School plays, endorsed performers)	Imitation firearms	School plays, endorsed performers. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.
Civil defence and emergencies		Natural disasters, Defence Force helicopters landing on school grounds.
Cadet forces	Category A	Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.

Possession

The word 'possession' can mean different things in different contexts. Ideally, a possessor of a thing has complete physical control over it and knows of its existence, its location and its qualities (as found in *Robertson v Police* unreported, High Court Palmerston North, 8 July 1988, AP138/88). Whether possession implies complete physical control depends on the circumstances.

Under Section 66 of the Arms Act 1983, every person in occupation of any land or a building (such as a school hostel), or the driver of any vehicle (such as transporting students to a firing range and carrying firearms), is deemed to be in possession of any firearm found on that land, building, or vehicle, unless the person proves that the firearm was not theirs and that the firearm was in the possession of some other person.

Immediate Supervision

'Immediate supervision' means that the licensed person is within reach and in control of the person using a firearm or airgun. The person providing the supervision must be able to take control of the firearm or airgun. They cannot be in possession or control of another firearm or airgun. On a shooting range or paintball field, the rules in place, such as a fenced field and supervision of umpires, referees or range officers may contribute towards supervision, providing circumstances allow supervisors to take quick and easy control of the firearm or airgun when required.

Who can possess different types of firearms, airguns and restricted weapons

Item	Who can handle/possess it	Notes
Category A (sporting) firearms	<ul style="list-style-type: none"> Firearms licence holders Others while under 'immediate supervision' of a licence holder 	Unless students handling firearms are firearms licence holders, arrangements will need to be made to ensure licenced persons can provide immediate supervision of those handling the firearm.
Specialty dangerous airguns	But not individuals whose firearms licence has been revoked.	
Airguns	<ul style="list-style-type: none"> Defence personnel, Police, etc. Persons 18 years of age or older Persons aged between 16 to 18 years of age who hold a firearms licence Persons under 18 years of age while under 'immediate supervision' of a licence holder or a person aged 18 years of age or older 	If students are not 18 years or older or holders of a firearms licence, arrangements will need to be made to ensure licenced persons or persons 18 years or older can provide immediate supervision to those handling the airgun.
Military style semiautomatic firearms (MSSA)	<ul style="list-style-type: none"> Only the person who is licenced with the correct endorsement to possess that MSSA unless a permit has been issued. 	If a MSSA is brought to the school for display purposes, it should not be handled by the students.
Pistols	<ul style="list-style-type: none"> The person who is licenced with the correct endorsement to possess that pistol. Others while on the range of an incorporated pistol club recognised by the Commissioner of Police and under the immediate supervision of a licence holder with the correct endorsements to possess that pistol or a pistol of that kind. 	Because there are licensing conditions on where pistols may be carried and they can only be used on a recognised range, pistol-related events would need to be held at a recognised pistol range with the assistance of appropriately licenced and endorsed individuals.
Restricted weapons	<ul style="list-style-type: none"> Only the person who is licenced with the correct endorsement to possess that restricted weapon unless a permit has been issued. 	If a restricted weapon is brought to the school for display purposes, it should not be handled by the students.
Imitation firearms	<ul style="list-style-type: none"> Anyone, however, carrying an imitation firearm without a lawful, proper, and sufficient purpose is an offence 	For example, an imitation firearm might be used in a school theatrical event. A supervising school staff member would not need a licence for a imitation firearm eg in a school play.



Communicating with parents/ caregivers, school community and school visitors

10

Communication with parents/caregivers and school visitors is important when organising an event involving firearms. Boards should write to the parents/caregivers and community outlining details of the event and seeking parental/caregiver consent. The information given to them should be sufficiently detailed to ensure that they can make an informed decision about their child's participation. Many activities may have a high level of perceived risk but a low level of residual risk: some people simply do not like guns in any situations.

A parental/caregiver consent form should be completed for each student. If parents withhold consent, the student should not be involved in the learning experience. However, wherever possible, the learning outcomes of the experience should be delivered to the student in some other way. See Tool 3: Example policy/procedure for the safe use and storage of firearms.

If the parents/caregivers give conditional consent, the school will need to conduct an individual risk assessment on whether the student may be involved in the learning experience or not. See Tool 4: Application for firearm storage.

When organising a sports event ensure you submit your safety plan to the New Zealand Secondary School Sports Council (NZSSSC) for endorsement.

In terms of firearm visual only demonstrations, with no actual live firing, a school's policy should be sufficient, with parents who are opposed to firearms simply choosing not to attend.

Purpose of a policy on firearms and airguns

Boards should consult with their community before adopting a firearms policy or amending their health and safety policy.

A firearms policy is to ensure students and staff are safe in the event that firearms are proposed to be on a school site. The policy should clearly outline your obligations under the Arms Act 1983, and Arms Regulation 1992 and help you comply with your requirements of the Health and Safety at Work Act 2015.

Schools will need to ensure they comply with the requirements under the Health and Safety at Work Act 2015 and the Arms Act 1983 (including Regulation 19 - Storage Facilities) at all times.

A policy on firearms will help boards, staff, parents and students to have a clear understanding of what is acceptable in terms of firearms on school grounds, at school events and in (or not in) the presence of students.

» If, as a board of trustees, you decide you do not want firearms on your school site under any circumstances, it is important to document that in a policy. This could be within your overarching health and safety policy, and does not need to be an independent policy.

this is slightly at odds with the statement, on page 4 Introduction, which states that if it does not intend to allow firearms, a policy is not needed, but may like to update the General School policies

to reflect this stance. refer comments on page 4 about a compulsory policy

Regular scheduled curriculum and sporting activities involving firearms must be covered by a policy and rules that are based on the Arms Act 1983 and Arms Regulations 1992 and follow school health and safety procedures. These activities may have their own Standing Orders/rules, such as in the case of school shooting clubs.

» If you do want curriculum-related firearms activities on school sites, your policy should explain when and what type of firearms/airguns will be available and at what kinds of events, and should show how you will comply with the requirements of the Arms Act 1983. The secure storage and handling of firearms and the supervision practices in place will need to be documented.



A policy should:

- » Outline the legal framework of the Arms Act 1983 and Arms Regulations 1992 under which you are operating.
- » Outline the board's approach to the presence of firearms and firearm safety courses for students.
- » Outline the provisions for firearms safety courses.
- » Be developed in partnership with the school's wider community to ensure that it reflects the community values, philosophies, ethos, goals and lived experiences. What does "lived experiences" mean?

If you do intend to have events/activities involving firearms on school sites or involving students, your policy should explain how the requirements of the Arms Act 1983 and Arms Regulations 1992 will be complied with and cover:

- » The need to sight the firearms licence of those attending with firearms and that they have the appropriate endorsements
- » The approval process required for the event/activity, including the need to sight the firearms licence of those attending with firearms and that they have the appropriate endorsements
- » The sign in and out requirements for the school, both of firearms holders and those visitors attending the activity
- » What type of firearms/airguns are allowed onsite
- » What type of events are considered acceptable
- » The way the firearms will be secured in storage when not being handled and how they will be identified (which will need to be determined in consultation with the local Police arms officer and subject to their inspection)
- » That access to stored firearms is only by a staff member with a firearms licence
- » What the level of handling of firearms by students will be
- » The level of supervision by a licence holder(s) that will need to be in place (and that should involve at least one member of staff with a licence)
- » A risk management process

The firearms policy and procedures should be provided to anyone wishing to bring firearms onto school grounds or involve students in firearms related activities. It should also be available for parents online.

A *firearms in schools* checklist will help you with developing your schools policy/procedure. See Tool 1: Policy development checklist and Tool 3: Example policy/procedure for the safe use and storage of firearms. Tool three should be customised by your school to suit your particular requirements and circumstances. Firearms procedures underpin the school's more generic health and safety policy.

Early learning services| me ngā kōhanga reo on school sites

Many schools have early learning services on their premises. When firearms are to be present on school grounds that share premises with services, there should be a process in place to notify the services of the risks associated with a firearms-related event. This should be done prior to the event taking place.

Tools and resources to support the draft guidelines for schools developing a firearms policy:

There are a few minor issues that should be addressed to ensure compliance with relevant Acts and Regulations and consistency with the draft guidelines document, being as outlined in red font on pages from the Tools and resources document below:

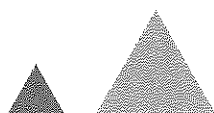


Tool 1: Policy development checklist



Note: This tool is an *example only* and should be customised to meet the individual needs of your school. Please note if your school does not intend to allow firearms for educational purposes, a policy is not needed.

Checklist	Checked
Our commitment to comply with the Arms Act is clearly outlined, considered and any issues addressed.	
Our policy has been developed in partnership with the school's wider community to ensure that it reflects the community values, philosophies, ethos, goals and lived experiences.	
We have outlined the Board's approach to the presence of firearms and firearm safety courses for students.	
<p>If our students participate in extra-curricular shooting activities:</p> <ul style="list-style-type: none"> » We have considered the need for firearm safety courses. » At least one staff member will be required to hold a firearms licence » Annual inspections will be conducted by NZ Police. » Firearms will be carried in a way that they are not easily identifiable when being transported and will be in a proper firearms bag. 	<p>This may be difficult to achieve, especially smaller schools & consideration should be given to another person, such as a BOT member, licenced gun club member, staff from another school, etc.</p>
A risk analysis management plan (Safety plan) will be in place for each event	
We have a set of rules that students and school visitors must adhere to.	
Storage: Have we considered the appropriate and safe storage of firearms on school sites or hostel premises?	
Firearms are registered and logged upon entering the storage facility.	
Firearms are put in to the care of the school immediately on arrival.	
Firearms are only exchanged between firearms licence holders.	note page 5 of the draft guideline comments in this submission, re Armed Forces personnel & Police do not have individual gun licences, but operate under Acts, such as the Defence Act
Firearms licences and endorsements are checked.	
Only staff with a firearms licence have access to our firearms storage facility.	
Ammunition and firearms are stored separately.	
Students, parents/caregivers are aware that firearms must be immediately stored in the firearms storage facility upon arrival on school property, when not under the immediate and personal supervision of a person with a firearms licence.	





Tool 2: Event checklist

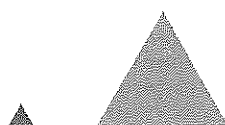


Note: This tool is an *example only* and should be customised to meet the individual needs of your school.

If your school offers shooting as an extra-curricular activity, consider the following factors when formulating your policies and procedures:

Checklist	Checked
We have clearly defined the nature of the activity allowing firearms on school premises or students to participate in an offsite activity involving firearms.	
We know what sort of firearms are coming into the school and what restrictions may apply to them. This includes airguns and replica guns.	
We have written to the parent/caregiver community clearly outlining the event and sought permission for students to participate.	
The Board can be assured that ammunition is stored separately from firearms.	
Alternative learning experiences are available for students not participating.	
We have considered the appropriate and safe storage of firearms on school sites or hostel premises during the event. refer page 4 re firearms licences	
When events are held on school premises (eg. careers days), all person(s) carrying firearms have had their licence(s) checked.	
A licensed firearms holder (i.e. a teacher or other staff member who has a firearms licence) has been appointed as the staff contact person during the event.	
The firearm demonstrator should keep their firearms in a case during transportation. Their licence will be inspected. No ammunition, other than dummy/inert ammunition, should be in the possession of the demonstrator.	
The period of instruction should be pre-approved by school staff, including the staff contact person.	
The period of instruction should include an overview of the seven basic firearms safety rules	

Only inert rounds should be used for demonstration. No live rounds of ammunition should ever be in the possession of the demonstrator.





Tool 3: Example policy/procedure for the safe use and storage of firearms

Note: This tool is an *example only* and should be customised to meet the individual needs of your school. If your school does not envisage bringing firearms on to school premises for the purposes of educational outcomes, then a policy is not needed.

This policy should be read in conjunction with the Arms Act 1983 and *Health and Safety at Work Act 2015: A Practical Guide for Boards of Trustees and School Leaders*.

Purpose:

The board of trustees is committed to ensuring the health and safety of all workers, students, visitors and contractors by complying with the Arms Act 1983 and Arms regulations 1992.

This policy applies to and is to be followed by all of our workers and others in the workplace. The policy also applies to all members of the school's leadership team, workers, students, contractors, temporary workers, volunteers and visitors.

A firearm is defined as "anything from which any shot, bullet, missile, or other projectile can be discharged by force of explosive and includes anything which if repaired could also do so".

The Board is committed to:

- » Complying with the Arms Act 1983
- » Engaging with the local community and understanding their position on firearms in schools.
- » Running regular firearm safety courses for students who participate in small bore and clay bird/target shooting activities or who store firearms at school.
- » If our students are involved in firearms related activities or if we store firearms on school site requiring at least one staff member to hold a firearms licence.
- » Ensuring there are alternative arrangements in place for communicating with parents/caregivers whose first language is not English and/or te reo Māori.
- » Completing a risk analysis management plan for each event involving firearms.
- » Having our firearms storage unit/armoury regularly inspected by NZ Police and as determined by Police District practices.

Procedures: should correspond with the table on pages 6 & 7 of the draft guidelines for consistency. note comments on the draft guidelines on page 7 in this submission

- » Firearms are only to be brought on to school grounds for educational purposes, careers days or special events such as Anzac day.
- » All firearms brought on to school grounds must be unloaded.
- » No ammunition shall be brought on to school grounds with firearms. Except for good, proper and lawful reasons such as a Anzac Commemorative event where blanks/inert may be used.
- » The board of trustees shall consult with the parent community before any firearms are brought on to school grounds as to whether the programme fits with their values and beliefs.
- » Before firearms are brought on to school grounds a risk analysis management plan shall be completed and made available to parents of children involved in the firearms programme.
- » Outside of the processes outlined above, firearms should only be brought onto school grounds in emergency situations (eg. NZ Police in operational emergency situations)
- » Firearms on school grounds shall, at all times, be under the control and responsibility of an authorised user who shall also hold an appropriate firearms licence. The principal shall sight the firearms licence of each authorised user bringing firearms on to school grounds.
- » The principal shall maintain a log of all firearms brought on to school grounds, the time they entered school grounds and the time they left, the name and signature of the authorised user and their firearms licence number.
- » The authorised user shall comply with the seven firearms safety rules as specified by the NZ Police.
- » These procedures will not need to be followed by the NZ Police or Armed Forces personnel in the event of a security incident where they need to come on to school premises for law enforcement or national security purposes.



Storage for firearms procedure:

1. The principal or other senior member of staff with a current firearms licence is responsible for the security of the firearms storage unit/armoury.
2. Firearms storage unit/armoury is always locked in accordance with the required standard.
3. The principal or other senior member of staff will always hold a current firearms licence.
4. The firearms storage unit/armoury has been approved by the police in accordance with the relevant legislation and regular inspections are carried out by local police.
5. Firearms are only handled by the licence holder to firearms licence holder.
6. All students who have firearms stored at school must follow these steps:
 - a. Participate in regular safety training.
 - b. The firearm must be in a clearly named and proper firearms case and always stored in the firearms storage unit/armoury.
 - c. No ammunition can be stored with the firearm at any location within school grounds.
 - d. Students must never have any live ammunition on their person or in their possession.
 - e. A firearm can only be moved from the firearms storage unit/armoury with an adult present. The adult must be a staff member and hold a firearms licence.



Review

This policy shall be reviewed every two years or more regularly by agreement. The provisions of this agreement may be varied by the Board following consultation with workers.

Signatures

Signed Dated ____/____/____

Signed Dated ____/____/____



Tool 4: Application for firearm storage

Note: This tool is an *example only* and should be customised to meet the individual needs of your school.

Name: **Contact No:**

Make: **Serial No:**

Firearm Licence number: enclose photo copy of licence

I acknowledge that health, safety and wellbeing of students, staff and volunteers is paramount.

I agree to participate in any firearms safety opportunities offered to me.

I acknowledge that awareness and training in the safe use of a firearm is the responsibility of my parents/
caregivers and myself.

I agree that the rules set out in the school's firearms policy are appropriate and that I will comply with these
at all times. I agree:

1. to take part in regular safety training
2. to ensure our firearm is in a clearly named and proper firearms case.
3. The firearm will always be stored in the firearms storage unit/armoury.
4. I will not store any ammunition with my firearm, in the firearms storage unit/armoury, or at any other location on school grounds.
5. I will never have ammunition on my person or in my possession.
6. I will only move the firearm from the storage unit/armoury with an adult present. I know and acknowledge that the adult must be a staff member and hold a firearms licence.
7. I understand that if I do not comply with any of the above rules, permission to have the firearm stored at school will be withdrawn.
8. That the firearm must be appropriately insured.

refer comments on page four as it may be difficult for small schools
to have a staff member with a firearms licence. consideration
should be given to other licenced personnel such as BOT member, etc.

Statement:

We have read our schools firearms policy and undertake to comply with all the rules and requirements set out here and in the Policy. We are also committed to comply at all times with the requirements and regulations under the Arms Act 1983.

..... **Student**

..... **Parent/caregiver**

..... **Principal**

..... **Date**

Thank you for the opportunity to present this submission



MEDIA RELEASE

5 March 2018

Draft guidelines to bring clarity and consistency on firearms in schools

It is important that boards of trustees and their school communities provide feedback on the draft guidelines for schools on the safe use and storage of firearms, released today by the Ministry of Education.

"We know there will be strong opinions about this, and it's important that people who hold those opinions participate in the consultation. Schools, parents, students and communities need to be on the same page on this," says Lorraine Kerr, President of NZSTA.

There are a range of circumstances where a board might want to consider allowing firearms on school premises, for example Education Outside the Classroom (EOTC) activities such as cadet force activities, secondary school shooting championships, or career days.

There is an expectation that schools provide a well-rounded education, suited to local circumstances. In New Zealand, outdoor recreation pursuits such as tramping, rock climbing, skiing, white water rafting, swimming, fishing and hunting are a significant part of the Kiwi lifestyle and a career in the armed services can be an important feature in some communities.

"It's important that school provides opportunities for students to learn about a whole range of things they will encounter at home or in later life, in a safe and controlled environment," says Lorraine Kerr.

"We don't want to wrap our kids in cotton wool, but we do need to make sure that we take all reasonably practicable steps to make sure they are safe.

"We need to make sure that everyone is clear about what the rules are, and that the policies and processes we adopt are fit for purpose. It's our hope that the guidelines will provide clarity and consistency for all boards facing these decisions."

The draft guidelines will be reviewed in May this year, to take into account feedback received during the consultation phase before the guidelines are finalised in July.

Further information including the draft guidelines is available on the Ministry of Education website <http://www.education.govt.nz/firearms-policy-for-schools-consultation>.

In our children lies our future - E tipu e rea

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Enquiries regarding this release can be made to Lorraine Kerr, President, NZSTA at 0276875606



Submission to Ministry of Education: *Draft guidelines for schools developing a firearms policy*

1. **We welcome the opportunity to comment** on the *Draft guidelines for schools developing a firearms policy* and its accompanying document *Tools and resources to support the draft guidelines for schools developing a firearms policy*. This is an important area of concern to schools, and it is good to see the Ministry of Education addressing it through guidelines and tools development.

The Department of Public Health, University of Otago Wellington focuses on the study and prevention of disease, prolonging life and promoting health at a population level. We teach undergraduate and postgraduate public health papers, courses and programmes, and run a successful summer school programme each year. The Department works closely with Public Health agencies throughout New Zealand and our researchers are leaders in the field who carry out innovative research which makes a real difference to the health of people in New Zealand.

Our Department includes over 80 teachers and researchers and over 50 post-graduate students (Diploma, Masters and PhD).

Researchers in the Department are currently studying firearms policy in a project called: 'Healthy Public Policy: where to for firearms policy?'. Lotteries Health Research funded it.

This submission covers the Ministry's overall approach: the need for a National Guideline; safety; the normalisation of firearms; lead exposure and a register of schools with firearms. We disagree with most of the 16-point list of situations when firearms may be allowed in school, and discuss sports shooting; firearms safety training; careers day events and Defence Force visits. Our submission concludes with seven recommendations.

2. Overall approach

- (a) We are aware of how onerous writing and consulting on new policies can be for Schools' Trustees. Why cannot the Ministry develop a National Guideline, rather than requiring individual schools to develop their own policies? A well-crafted National Guideline would ensure consistency and application of best practice across the country, rather than burdening individual schools. The number of schools that might want to have firearms in the school may be relatively small. This would not remove the requirement to consult the school's community; rather, the school could consult on the basis of the National Guideline.
- (b) But our view is that firearms and airguns should not usually be allowed anywhere on school grounds.
- (c) **The safety record** appears to be good, but the danger of accidental discharge and injury remains. The precautionary principle should apply here. Severely reducing the occasions and circumstances when firearms and airguns are allowed at schools minimises the risk and is preferable to allowing a wide range of circumstances, as appears in the draft guidelines.
- (d) **Normalisation of firearms in society.** Firearms have a legitimate place in our country, as a tool used by stock farmers for the humane killing of injured animals, for pest control, and by the NZ Police and NZ Defence Force. Because a gun's sole purpose is to fire a dangerous or



lethal projectile, we urge government agencies such as the Ministry of Education and schools' Boards of Trustees to be cautious about in any way promoting the use of firearms and airguns. Given the growth and role of firearms in popular culture, there is a danger of further normalising or even glamourising firearms by allowing them in schools on careers days, in the excitement of EOTC, as sports, or for amusement. Real or replica firearms should not be used in theatrical performances or in other contexts. Objects might be used that appear to an audience to be a firearm, but are clearly not an actual or replica firearm.

Firearms-based fundraising events, 'amusement devices', auctions and sponsorship involving firearms can also contribute to the normalisation of firearms and are inappropriate at schools. We suggest other community facilities (community hall or local church) could be used for such events.

The NZ Defence Forces already have considerable involvement in at least 30 secondary schools through the 'Service Academies' programme, providing military-focused programmes for senior secondary school students disengaged or disengaging from education. [1] This appears to provide recruitment opportunities for the NZ Defence Force [2] but it is less clear how schools benefit in ways that could not be achieved equally well through dedicating the Service Academies funding to fully-trained teachers supporting disengaged students.

- (e) **The lead contamination** from firearms and airguns is of particular concern around children. Airguns are often put forward as a 'first gun' for children to learn about shooting. While soft airguns can use plastic pellets, lead pellets are much in use for airguns; users are exposed to lead while loading and firing and clearing up from airguns. When using firearms, people can be exposed to lead from both primer and ammunition.

According to the World Health Organization, there is no known safe level of lead exposure.[3] In New Zealand, according to Worksafe, a person with blood lead levels equal to or exceeding 0.48 $\mu\text{mol/litre}$ is required to be notified to the health authorities, under the Health Act, 1956. [4] Our research has shown considerable levels of ignorance about the dangers of lead among shooters' representatives, and in some cases outright denial that lead is a health problem or that shooters are exposed. These individuals tend to cite as evidence that they have been shooting for a number of decades and that they and their children are well. This level of anecdote ignores evidence worldwide that shooters, especially at firing ranges, are at risk of lead exposure. [5, 6]

Public Health experts believe many more New Zealanders have raised blood lead levels than are tested, partly because there are few or no immediate symptoms of lead poisoning. However, recreational shooters are the second largest group of people notified in 2014, 2015 and 2016 as having raised blood lead levels (the largest group being people with exposure to lead-based paint, such as house-painters). [7] The fact that shooters' lead exposure is under-researched does not mean it is insignificant.

Children, and babies in utero are at particular risk from lead exposure (both groups are likely to be around schools). According to the World Health Organization:



'Young children are particularly vulnerable to the toxic effects of lead and can suffer profound and permanent adverse health effects, particularly affecting the development of the brain and nervous system. Lead also causes long-term harm in adults, including increased risk of high blood pressure and kidney damage. Exposure of pregnant women to high levels of lead can cause miscarriage, stillbirth, premature birth and low birth weight, as well as minor malformations.' [3]

It is possible to reduce shooters' exposure to lead through shooters' attention to hygiene at firing ranges. Another group at risk in firing ranges, whether indoor or outdoor, are those who clear away used bullets. If used lead ammunition is left at ranges, lead can leach into any nearby earth, adding to the lead in dust and soil. If a firing range is located at or near a school, this may affect students playing in or near the area. If students attend a firing range away from the school, but as part of a school-arranged activity, the school has a duty of care to ensure that appropriate safety procedures, policies and processes are in place to minimise students' exposure to lead.

Public health advice about preventing exposure especially at indoor firing ranges is available from the Ministry of Health and from regional public health offices. [8, 9]

- (f) **Register of schools with firearms.** We consider it very important for schools which do have guns for any reason to notify the Ministry of Education, and for the Ministry to establish and maintain a register of the schools. This is important because of the health and safety concerns about firearms and airguns; a register will facilitate the input of public health authorities and NZ Police with regard to health and safety. The arguments with regard to a register put forward by the gun lobby in the 2017 Health and Safety Sector Reference Group – Firearms in Schools are specious; they assume the register would be made public, and that criminals would then target schools for robberies. As long as the register information is made available confidentially only to appropriate health and police authorities, the 'shopping list for criminals' argument does not apply. Furthermore, criminals may also simply assume there are guns stored in all rural schools.
3. **Situations when firearms may be allowed in school.** The *Draft Guidelines* lists 16 situations when firearms may be allowed in school. From the list of 16 situations, we can discern only two when it would make sense to have firearms in a school.
- (a) **Retain in Guidelines: Situations when firearms may be allowed in school**
- Pest control
 - Civil defence and emergencies
- (b) **Eliminate from Guidelines: Situations when firearms may be allowed in school**
- EOTC [Education outside of the Classroom] events such as clay target shooting and controlled activities on school camps
 - Firearms Safety Course
 - Sponsorship
 - Career day
 - Defence Force visits
 - Auctions involving firearms



- School gun club
- Inter-school shooting competitions
- Hostels
- Legally transported firearms
- Imitation firearms (school plays, endorsed performers)
- Fundraising (offsite event, but start/end of event hosted at school)
- Amusement devices
- Cadet forces*

* It is unclear why the Cadet Forces are included as a situation when firearms may be allowed in school. A personal communication with the NZ Cadet Forces office (19 March 2018) indicated that Cadet Forces do not operate in schools at all. What 'situation' does the *Draft Guidelines* envisage here?

The Health and Safety obligations discussed on p12 of the *Draft Guidelines* place a heavy onus on Boards of Trustees. Reducing the number of occasions and situations when firearms are on school property will reduce pressure on schools and Boards.

Some of the situations have been discussed above. Here we consider: Sports shooting, Safety training, Career day, Defence Force visit; and Hostels and transportation.

- (c) **Sports shooting in schools.** We believe shooting sports are inappropriate in schools. One of the key values of sport in schools is physical activity; this is particularly important at a time when the obesity epidemic threatens our country's health. [10] Shooting sports generally entail standing or lying still in one place to fire the firearm and so provide little or none of the vigorous physical activity from which students may benefit in terms of fitness and weight, as in many other sports. Where hand-eye or body-eye coordination is considered of value, this can also be achieved in other, more active sports (e.g. some ball sports).

The New Zealand Secondary Schools' Sports Council notes in its Census data the numbers of secondary school students participating in firearms sports. [11] Two shooting disciplines are identified. The number of students involved in each of the sports is small; consequently, not many students will be affected if shooting sports take place at clubs and ranges, and are not available in schools.

Clay Target	2017: 524 participants
Shooting	2017: 996 participants

If students wish to be involved in shooting sports, our suggestion is that they be directed to the local firing range or gun club to undertake this sport. If students are referred or taken to sites outside the school premises, it is important for schools to review with the provider how lead dust contamination is managed at the site. Schools need to satisfy themselves that there are policies, procedures and processes in place to minimise any lead exposure. Local Public Health authorities and/or a Medical Officer of Health should be approached for guidance on this.



- (d) **Firearms safety training.** We agree that firearms safety training is important for those who use firearms, and that practical hands-on training with actual firearms is an essential part of such safety training. However, schools are not the place for this hands-on training.

A rural school that wishes to ensure students receive some firearms safety instruction could offer this in collaboration with NZ Police or its contract providers in the form of a talk or lecture, but without the hands-on component; the latter would be more appropriate at a local gun club or firing range, and always with parental permission.

- (e) **Career day.** Taking any firearms to school as part of a career day is unnecessary and inappropriate. We believe there are few careers in New Zealand that require the use of category A firearms and airguns, as suggested on page 7 of the Guidelines, and very few careers that require the use of any other type of firearm. Which organisations and employers exactly do the Ministry envisage would be attending a careers day with category A firearms and airguns?
- (f) **Defence Force visit.** There is no reason for the NZ Defence Force to visit a school with firearms. Recruitment into the armed forces on career days can be achieved without firearms being brought into the school.
- (g) **Hostels and transportation.** If schools only have firearms on the premises for pest control and emergencies, there will be no need for schools to be involved in transportation or storage. Firearms and airguns should not be stored in schools and hostels.

4. Recommendations:

1. A National Guideline should be developed rather than a requirement for individual schools to develop their own policies.
2. Firearms should only be allowed in schools / school property for reasons of pest control and Police emergencies.
3. The Ministry of Education and those Schools' Boards of Trustees wanting to allow firearms in their schools need to learn about the dangers of lead exposure in firearms and airgun use.
4. Given the low level of student involvement in shooting sports, and the danger of lead contamination, students should undertake all shooting sports away from the school, at clubs and firing ranges outside the school.
5. Schools taking students to firing ranges need to assess the safety procedures and risk of lead exposure and noise exposure at the provider's premises and take all steps to ensure students are not exposed to lead or noise. Schools should take the initiative on this issue and consult with local public health authorities / Medical Officer of Health, territorial local authorities and NZ Police.
6. The Ministry of Education should establish and maintain a register of schools with firearms or where students are involved in shooting while under the care of the school, and share this information with appropriate health authorities and NZ Police.



7. Firearms safety training, with parents' permission and without the presence of firearms or airguns, can be carried out on school premises. Any training involving the presence of firearms or airguns, and only with parents' permission, should take place away from school premises.

Professor Diana Sarfati, Head of Department
on behalf of the Department of Public Health, University of Otago, Wellington
10 April 2018

With input from:

Contacts:



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From: Christopher Le Breton
To: Health & Safety Info
Subject: Sub 78 - Guns in Schools?
Date: Tuesday, 10 April 2018 7:41:26 p.m.

Tuesday 10th April, 2018

Minister of Education,
Honourable Chris Hipkins,
Parliament Buildings,
Private Bag 18041,
Wellington 6160

Email: healthandsafety.info@education.govt.nz

Dear Minister –

I am writing as the General Manager and Head of Peace Development of The Peace Foundation, an NZ charity founded in 1975.

We express our deep concern about the consultation on draft guidelines for schools developing a firearms policy in NZ Schools. **We are strongly opposed to any programme of gun instruction in schools, at any level.**

There is no acceptable justification for guns in NZ schools at all. Instead, as we explain later, NZ has a track record of bringing peace sustainably in the school community.

Ending the Spirit of Kiwi Life: The draft guidelines are flawed: and appear to be an attempt to legitimise the presence of firearms in schools and to normalise a “gun culture” among students of the sort that has led to tragedies in schools in other countries. If firearms are allowed in schools it will make guns seem cool and just part of normal life for very impressionable young souls, changing irrevocably the spirit of the Kiwi way of life.

Importing USA gun culture: Surely, the media's profiling of murderous

gunfire in USA schools, together with the marches by shattered students, friends and families, must impact on the minds of all thinking citizens against guns? In our communications with war veterans, they would not want ANZAC Days to exhibit the weapons of war, weapons that cause violent death and destruction. ANZAC Days are there to commemorate, to remember and celebrate the end of having to use guns, and the attainment of a peaceful society. **Why is NZ trying to emulate the worst aspects of American culture?**

The proposal suggests times when it may be appropriate to allow student involvement with firearms on premises or outside school premises and even the possibility to allow storage of firearms on school grounds! All the examples given occur now, without guns in schools, except perhaps inter-school shooting competitions.

Boards of Trustees

We strongly challenge the right stated in the guidelines for individual boards of trustees, after consulting their communities, to decide whether or not to have a gun policy in their school!

This is one of the key flaws in the draft Guidelines: that the appropriate body to make decisions about firearms in schools is the Board of Trustees. This is completely unacceptable because other critical issues for the well-being, physical and emotional safety, and security of students and staff - such as building safety, who is considered suitable to teach in schools, and so on - are determined by **nation-wide regulations** or policy. Firearms in schools must similarly be the subject of **nation-wide regulation**, either through National Guidelines for schools or an amendment to the Education Act 1989.

We reiterate our opinion that allowing guns is of national importance but that a national policy is required rather than handing down the responsibility to local areas!

In sum: Introducing the weapons of war to our youth is a serious mistake both ethically and educationally. If there are some communities where gun use is already pervasive and which particularly want to run gun safety courses then let them organise such activities amongst themselves with help from the Mountain Safety Council or similar, but please not in any of our

schools. Minister, there should be no guns in our schools whatsoever. **We request, Minister, your support for a national policy which supports the status quo of No Guns in Schools.**

Finally Minister, we have a positive suggestion to make: We request you embark on a new policy to introduce peer mediation conflict resolution skills training in every NZ school, to bring peace to every corner of the land, from Kaitia to Stewart Island, and New Plymouth to Ruatoria. The Peace Foundation has been running this kind of training through "Cool Schools" in Primary Schools, and Leadership through Peer Mediation (LtPM) in Secondary Schools since 1984. These tools are developed in NZ, and lead to a reduction in **bullying and violence in the school community**; and at the same time contribute to raising academic standards, tolerance and acceptance of the diversity in the school community and wider neighbourhood. We have the research to prove it, and indeed the previous NZ Labour Government was a major supporter and champion of our peaceful relationship-building tools in schools. Indeed this training could become a new NZ educational export, in the spirit of NZ as a Pacific peacemaker nation rather than a warmonger.

The New Zealand Ministry of Education must reject gun culture in schools in its entirety and - learning from the previous Labour Government - foster a culture of peace, in the spirit of partnership that is at the basis of the Treaty of Waitangi.

Yours sincerely,

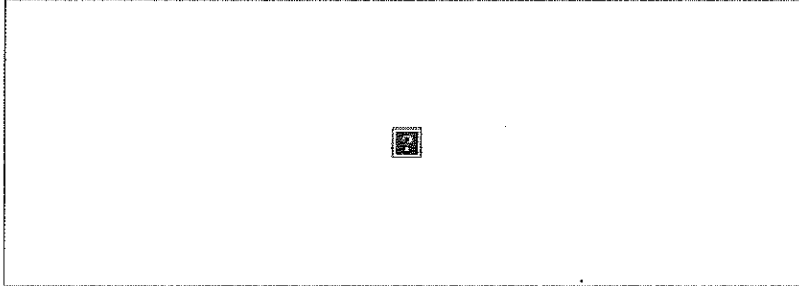
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"Education is one of the most powerful ways we can change the world"

The Peace Foundation helps to bring about peace in New Zealand and overseas through training children in peer mediation conflict resolution skills. Just imagine what we could achieve if every school in the country, and on Earth, used our tools. Become a supporter, and help make this happen across New Zealand, and worldwide.



Submission to the Ministry of Education and New Zealand School Trustees Association's Draft Firearms Guidelines for Schools

Tēnā koutou

Thank you for your invitation to respond to your draft guidelines for schools developing a firearms policy.

I wish to respond as a member of the community, a parent, a grandparent and a retired secondary school teacher.

These are my responses to the "Legitimate circumstances where firearms may be part of students' education and sporting activity" as they are given in the draft guidelines:

1 EOTC Events such as clay target shooting and controlled activities on school camps.

These should not be held on the school site.

2 Firearms Safety Course

There is no need for school students in general to handle firearms and/or undertake firearms safety training. Only a minority of students will handle guns occupationally or in sport. It is not a generally required life skill that can appropriately be part of the school curriculum. Those who will use guns can be trained in firearms safety at the time they apply for a gun licence at 18 years old. School cadets will be trained in gun safety as part of their cadet course off school premises - likewise gun club members.

3 Sponsorship

No sponsorship by businesses or organisations involved in firearms should be allowed.

4 Careers Day

Firearms are an unnecessary accompaniment to information about careers.

5 Defence Force Visits

This category of activities as outlined in the guidelines allows restricted firearms but only if held or displayed by Defence Force personnel. When recruiting or just visiting, the Defence Force emphasises positive qualities such as discipline and leadership as well as outlining the many opportunities offered in the NZ Forces to gain life and career skills. The display of an assault weapon would merely be a gratuitous attraction.

6 Auctions Involving Firearms

It is not appropriate for firearms auctions (which include all types of firearms) to be held at schools. Commitment to non-violence by New Zealand schools does not sit well with such activities. Firearms are weapons, whether collected or used. There are other, more appropriate, venues.

7 School Gun Clubs

Gun clubs should not be held on school premises. And the storage for guns used in this or any other school activity on school premises is not advisable. The non-listing of gun collections currently held by schools speaks to the dangers involved.

8 Pest Control

As in the guidelines, any necessary pest control must be done by a professional outside of school hours.

9 Inter-school Shooting Competitions

Inter-school shooting competitions should be held on shooting ranges away from the schools involved.

10 Hostels

Storage of firearms should not be allowed in hostels connected with schools.

11 Legally Transported Firearms

These are general requirements for the transportation of firearms.

12 Fundraising Events – off-site event e.g. pig, rabbit, possum hunt but start/end hosted at school.

Such hosting would be allowable if guns were not brought back onto school grounds.

13 Amusement Devices for School Fairs

Use of pellet guns under supervision and safety regulations as in the guidelines is acceptable.

14 Imitation Firearms for School Plays

All right as long as identifiable as imitation.

15 Civil Defence and Emergencies

Civil Defence and Police (armed if required) of course should have school access whenever necessary.

16 Cadet Forces

Cadet Force training should be held off school site and guns stored away from school.

My final comment is that these decisions about firearms in schools would possibly be better made at the national level rather than being left to school boards. A consistently strong non-violent stance would accord well with other areas of New Zealand policy.

Thank you again for the opportunity to contribute to the discussion.

From: [Quakers in Taranaki](#)
To: [Health & Safety Info](#)
Subject: Sub 80 - School Firearms Policy
Date: Wednesday, 11 April 2018 11:59:23 a.m.

We firmly believe that teaching about firearms and the presence of firearms is not appropriate for New Zealand schools. We do not support the implicit permission given by the NZ Ministry of Education by the provision of guidelines for Boards of Trustees to allow a policy of introducing firearms or firearms training in schools.

We support the submission made by John Hincheliff and others that introducing weapons of war into school-supported activities is ethically and educationally unsound.

Providing the opportunity for weapons training in schools gives the wrong message to youth that violence and preparation for violence is part of a normal society. This has not been the ethos of New Zealand educational culture since the school cadets were no longer compulsory.

We are against any re-militarisation of New Zealand schools.

If guns are to be used for sport or hunting there are other appropriate venues and clubs in the community for training outside of school hours, just as children attend ballet, music and sports clubs.

We note that in the draft resources provided to Boards of Trustees only a parental consent form is supplied with no opportunity for parents to register their non-consent or object to such an activity taking place. It seems unreasonable that parents are asked to provide insurance should things go wrong for school activities outside of their supervision and control.

We believe that safer communities would be better served through training in non-violence, respect for others and peaceful reconciliation of differences and that this training should take precedence over gun-related safety training. We feel the Ministry of Education could take a lead in developing policy guidelines as to how such safety training may be achieved in the schools and encouraging Boards to develop such policies especially given the current prevalence of bullying and domestic violence in the community which contribute to far more harm than accidents with guns.

On behalf of the Taranaki Monthly Meeting of the Religious Society of Friends (Quakers) in Aotearoa New Zealand

From: [OMEP Auckland](#)
To: [Health & Safety Info](#)
Subject: Sub 81 - Submission: Draft Guidelines for Firearms Policy for Schools
Date: Wednesday, 11 April 2018 11:44:07 a.m.

Draft Guidelines for Firearms Policy for Schools

This submission is presented on behalf of the Auckland Chapter of OMEP Aotearoa New Zealand. OMEP (World Organisation for Early Childhood Education) is an international non-partisan and non-sectarian NGO (non-government organisation), founded in 1948. It is affiliated with the United Nations and has consultative status with UNICEF, UNESCO and the Council of Europe. World OMEP has more than 64 member countries, and OMEP Auckland is one of 5 New Zealand chapters.

OMEP provides a global perspective on children's issues. Its aims include: fostering optimum development of every child; advocacy on behalf of children and families; promotion of quality early childhood education; and protection and promotion of children's rights and the optimum conditions for their wellbeing and happiness in their family, institutions and society, in accordance with the United Nations Convention on the Rights of the Child (UNCRC).

We do not consider there are any circumstances where firearms should be permitted on school grounds, except in the situation where armed Police Officers might be required to enter school grounds.

We make the following points with regard to the Draft Guidelines:

1. Lack of relevant data on the current situation re firearms use in schools:

There is no background information provided with regard to how many students are presently involved with firearms within schools, school firing ranges, etc. We believe the Ministry of Education should hold this information and strongly disagree with the decision to abandon a schools Gun Register.

2. Composition of the schools 'Health and Safety Sector Reference Group'.

This group was heavily weighted towards representatives of organisations involved with firearms, sports shooting and hunting. The group did not include any public health experts and for that reason important perspectives are missing. The composition of the reference group is not included on the Ministry of Education website or in the draft Guidelines, so this weighting is not readily discovered.

3. Potential normalisation of firearms on schools. With the document's overall focus on gun safety, and the exclusion of health and social factors, it might be seen as contributing to a public perception that the presence of firearms in schools is a normal situation. We are gravely concerned at this possibility.

4. Lack of consideration for health, including mental health, concerns. There is no discussion about the potential health risks associated with firearms, both for students and staff, e.g. lead poisoning, nor of social or mental health issues associated with children, young people and firearms. The Public Health

Association has expressed concerns in various media, for example see http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12021116 and <http://community.scoop.co.nz/2018/03/do-we-really-want-guns-in-our-schools/>

Risks of lead poisoning are well documented in the submission from the Peace Movement Aotearoa.

5. *Potential normalisation of firearms on schools.* With the document's overall focus on gun safety, and the exclusion of health and social factors, it might be seen as normalising the presence of firearms in schools. We are very concerned at this possibility.

6. *Decision making re firearms in schools.* The document is based on the premise that Boards of Trustees (BOT) are the appropriate body to make decisions about firearms in schools. This is unacceptable. Other critical issues for safety and wellbeing of students and staff are determined by national regulation and policy. Any introduction of firearm presence or use in schools should also be the subject of nation-wide regulation.

7. *Table outlining situations where firearms might be allowed.* We do not accept that any of these activities should be permitted on school grounds.

- Activities where students may be involved in firing guns for purposes such as sporting activities or for gun safety lessons should only take place on off-site purpose-built firing ranges under appropriate supervision. In these circumstances firearms should be stored safely at the nearest gun club.
- There is no reason for firearms to be brought onto school grounds for occasions such as Careers Days or commemorations such as Anzac Day. If there are situations where it is felt to be essential that students view firearms, the potential employer should arrange for them to be taken to an appropriate, safe, offsite venue. Article 38-3 of UNCRC is relevant in this regard: *States Parties shall refrain from recruiting any person who has not attained the age of fifteen years into their armed forces. In recruiting among those persons who have attained the age of fifteen years but who have not attained the age of eighteen years, States Parties shall endeavour to give priority to those who are oldest.*
- No displays of firearms, or auctions of firearms, should take place on school property.
- We acknowledge there might possibly be some circumstances where firearms must be transported through school grounds. If so, the firearms should remain in the vehicle within sight of the licence holder at all times, and measures must be in place to ensure they cannot be removed if the licence holder is momentarily distracted.

8. *Imitation firearms.* Where imitation firearms are necessary as theatrical props or similar, then they should be easily distinguishable from real firearms.

Marianne Kayes
Secretary, OMEP Auckland

On behalf of OMEP Auckland Chapter



Organisation Mondiale pour l'Éducation Préscolaire
Organización Mundial para la Educación Preescolar
World Organisation for Early Childhood Education

Website: www.omepaotearoa.org.nz Registered Charity CC53036

11 April 2018

Ministry of Education

Email: healthandsafety.info@education.govt.nz

Re: **CONSULTATION ON DRAFT GUIDELINES FOR SCHOOLS DEVELOPING A FIREARMS POLICY**

To whom it may concern,

The Ministry of Education has promulgated draft guidelines around firearms in New Zealand Schools and has sought feedback through this consultative process.

COLFO would like to acknowledge that robust consultation has taken place and thanks the Ministry of Education for taking a balanced and pragmatic approach to the matter of firearms in schools. The draft guidelines present the required information for school boards to develop their own local policies dependent on their own context. This balanced approach will ensure that communities can work with their school boards to arrive at outcomes that meet community expectations, without being overbearing on one-hand or irresponsible on the other.

Acknowledging that the 'flashpoint' for drafting these guidelines arose from publicity and processes around the New Zealand Defence Force (NZDF) interactions with a school, COLFO would like to recommend very minor amendments to the draft guidelines. This is in recognition of NZDF's ongoing community interaction with New Zealand communities not only through schools but also regional shows, exercises and events such as field days.

The draft guidelines on page 7 recommend that *"No student, parent/caregiver, volunteer or staff member may hold/ possess a restricted firearm during Defence Force visit"*. Further, on page 8 regarding restricted weapons: *"Only the person who is licenced with the correct endorsement to possess that restricted weapon unless a permit has been issued. If a restricted weapon is brought to the school for display purposes, it should not be handled by the students"*.

COLFO requests that references to holding / handling should be removed in favour of remaining with legally defined term of "possession" as has been outlined on page 8. This allows for NZDF to apply its own policy controls (such as physically securing weapons to immovable objects, or having qualified crew supervising students in or around an armed military vehicle such as a LAV) to ensure non-NZDF personnel do not illegally take possession of military weapons.

These minor amendments remain legally compliant regarding "possession" and places the onus on NZDF to apply appropriate policies and procedures while not outright removing valuable tactile learning experiences from students.

On page 7: *"Auctions involving firearms (The dealer must have the correct licences and endorsements for the type of firearm.)"* This is incorrect. A dealer license allows for possession and sale of all endorsement types, therefore this should be corrected to: *"The dealer must hold a current dealer license"*.

In a more general sense, COLFO is particularly pleased that the Ministry of Education acknowledges the role that firearms have in schools. The guidelines appropriately highlight firearms safety rules and refer to the Police arms code. This is important to ensure that young people receive positive education around firearms safety and it is appropriate that the Ministry of Education supports and facilitates this.


It is also pleasing that the Ministry of Education acknowledges the need to continue supporting shooting sports in schools. Many schools support small bore target shooting and clay bird to name a few firearms activities. Teaching and introducing school students to these sporting opportunities is fundamental in feeding forward to growing world class sportsmen and sportswomen. The benefits of this are evident with international level results, including competing at Olympic and Commonwealth games level.

Community based hunting activities in rural environments often rely on schools as a hub for the community and it is appropriate that this continues for such events as wild game competitions, pest control activities such as possum and rabbit culls and the like. Such community support and involvement is a fact of rural lifestyle and community cohesion. Often such events directly benefit the school, such as when the events are used as fundraisers. It is therefore appropriate that those activities are enabled by these guidelines.

In summary, COLFO believes this process of consultation has been in good faith and, as a result (pending recommended changes), presents school boards with a valuable reference in ensuring firearms in schools are managed appropriately to the benefit of all. The challenge will now fall to individual school boards to consult with their own stakeholders in the same good-faith to ensure balanced outcomes are arrived at to meet the needs of their own students and communities.

Yours sincerely

Paul Clark

A handwritten signature in black ink, appearing to read 'Paul Clark', written in a cursive style.

Chairman

Council of Licenced Firearms Owners Inc

11 April 2018



Target Shooting New Zealand Inc

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Draft Guidelines/Resources for Schools Developing a Firearms Policy

Feedback from Target Shooting NZ Inc.

Target Shooting NZ would firstly like to applaud this effort to ensure that students will be able to continue to participate in their chosen sport of shooting. TSNZ firmly believes that the benefits and life skills provided by the sport to teenagers in particular far outweigh any real or imagined negativities.

TSNZ as members of FSCANZ would also like to endorse the comments already provided by Joe Green.

In addition, we provide the following feedback in relation to TSNZ's particular environment:

Draft Guidelines:

Page 9, Airguns – the final two points in this paragraph would be much improved by reversing their order, so that the statement starts with:

“Anyone 18 years of age or older can possess and use an Airgun. Anyone under 18 years of age may possess or use an airgun if:

- they hold a New Zealand Firearms licence.....”

Resources:

These points arise in a number of places within the Tools in the Resources document:

- Teacher / Staff member having to have a Firearms Licence – in many cases a TSNZ school programme will include a Teacher-in-Charge (TIC) who does not have a Firearms Licence, however as the shooting takes place at a TSNZ-approved and controlled range, it is the TSNZ Club members who are actually in charge of the firearms and they DO hold Licences, we believe this to be totally appropriate. Specifying that there MUST be a teacher or school staff member present with a Firearms Licence will inappropriately and severely limit our school shooting programmes currently in place.

- Annual police inspections – what does this relate to, and how will this be managed?
- Risk management information required for “an event” – what is the definition of an event? While we do hold one-off events such as our Nationals, for which we provide Risk Management information to the NZ Secondary Schools Sports Council, TSNZ programmes also include many sessions of shooting and training at Clubs. It would not be practical to have to provide risk management information for each of those sessions as individual events, so there should be capability of “bulk” risk management systems to cover these.
- Storage of ammunition – this is stated as “Ammunition and firearms are stored separately”. This is not currently a condition of the Arms Act 1983 so should not be required, especially as for schools, this could mean providing two completely separate secure areas.
- Ammunition – the statement that students “must never have ammunition in their possession” actually results in students not being able shoot at all, while “no ammunition shall be brought onto school grounds with firearms” results in those schools that have ranges on their grounds not being able to shoot. In a storage situation, it can be well imagined that a parent would deliver a target rifle along with its appropriate ammunition to the school for their student, and the current wording also prevents this.
- The Application for Firearm Storage form implies that only a student with a Firearms Licence could apply. There are students whose parents have correct Firearms Licences who may wish the school to store a firearm for the student to use under correct supervision, and this should not be prevented. There have never been any issues in TSNZ Club environments when a parent-owned target rifle is properly kept by a Club for youth to use under Club supervision, and if a school offering storage has appropriate licenced staff, this should cause no issues there either.

Thank you for the opportunity to comment during this Draft process. TSNZ President Bruce Marchant and I will be attending the upcoming meeting in May, and look forward to continuing to play a part in ensuring NZ's youth continue to be able to access safe and suitable firearms experiences.

Yours sincerely



Jackie Lindsay
TSNZ Administration Officer.

From:
To: [Health & Safety Info](#)
Subject: Sub 83 - Submission on Firearms in Schools
Date: Wednesday, 11 April 2018 9:29:36 a.m.

Consultation on Firearms in Schools

This legislation arises at in response to a critical incident in where public concern was raised by the display of military arms in schools. These concerns seem to have created a sudden realisation that firearms were relatively common in schools and there needed to be a more specific management of their risks. The consultation is undertaken with very little solid information on the presence of firearms within schools and their uses as well as their distribution between city and country schools. It has also comes at the time of significant change in education policy in which the implications of weapons may be of relevance. Both these situations warrant more careful consideration of the context than is provided in this consultation.

While the suggested legislation addresses important issues of the largely physical risks of the presence of firearms, it avoids what is perhaps a much more important issue: that of the impact of school firearms activities on the understanding of the role of firearms within society and the effect that has on the role of firearms on personal identity for those in the school affected. This is in the context of the high prevalence of firearms in NZ and the prominent role of firearms in mortality in the society.

The proposal makes the assumption that firearms do have a valid role in society in asserting that "We do acknowledge that there are legitimate circumstances where firearms may be part of students' education or a sporting activity." A number of possible activities are indicated although the legitimacy of these is hardly validated.

While the issue of physical risk is well addressed on in the proposal, the moral and social implications are barely mentioned. This is surprising since the incident precipitating this legislation clearly indicated a great concern of a moral nature within the society. We need much greater information on the role of firearms in society, and the rationale for and against their use in schools to enable a substantial debate to be launched.

For instance, it can be argued that a firearm is in essence a tool of violence, with the ability to destroy at distance with great suddenness in a context that the shooter has a clear dominance over the target. This is inherently an activity which preferences attitudes of dominance and control potentially of a highly antisocial nature. It validates the belief that such violence and control is a valuable part of the social order.

If this view is valid, then it clearly need to be recognised. While it may be argued that firearms have a vital role to play in the society, it is necessary to balance the need to fulfill these roles against the corrosive effect of the weapons and the attitudes that they promote on the society as a whole. Examination of the activities considered appropriate for school reveals that these are dominantly of a recreational nature, going far beyond what is necessary to fulfill those essential roles. It is important also to ensure that the impact of these activities do not affect the society as a whole, and are therefore removed from schools in general.

We also need to be able to take into account the prevalence of firearms in society and its impact, particularly in terms of mortal impact. These regulations place the responsibility on local education boards to make the decision as

to the appropriateness of the use of firearms within schools in their region within quite broad limits, and avoids any consideration of the moral or social implications involved, thus moving this highly critical issue away from national politics and avoiding the obvious need for a national debate on the issue.

To illustrate the anomaly of this situation one may compare it with the use of recreational drugs, which similarly are wide-spread, with concern in some cases that young people be educated into their responsible use. Yet, such activities receive far greater scrutiny and censure from a moral, as well as physical perspective than is conceived by these proposed regulations.

It is important, of course, that any use of firearms be undertaken with a very clear focus on the physical safety of those involved, and in this regard these regulations are supported. At the same time, it is crucial that the moral nature of the activity be clearly outlined and that a clear policy of developing a national debate on the issue is foreshadowed.



Peace Movement Aotearoa

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Email pma@xtra.co.nz Web site www.converge.org.nz/pma

Draft Guidelines for Schools Developing a Firearms Policy Submission to the Ministry of Education, April 2018

We welcome the opportunity to comment on the Draft Guidelines for Schools Developing a Firearms Policy, because the issues around firearms in schools are of the utmost importance to the health and safety of students and staff, and to the overall wellbeing of society more generally.

Peace Movement Aotearoa is the national networking peace organisation, registered as an Incorporated Society in 1982. In addition to our core networking activities, our work is focused in two main areas - disarmament and human rights - which are both essential for creating and maintaining peaceful societies. We regularly provide information to United Nations disarmament and human rights monitoring bodies, including (of particular relevance to issues around firearms in schools) the Committee on the Rights of the Child, on New Zealand's compliance with the Convention on the Rights of the Child, and the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict (OPAC).

This submission is based on discussion with member and supporting organisations and individuals, primary and secondary school teachers, and human rights, children's rights and public health experts. An overview of our submission was released publicly last week due to the number of requests we received for information on the draft Guidelines and for guidance on points to include in submissions.

We have a number of concerns about the draft Guidelines which are outlined below under the two main headings, followed by our recommendation, as follows:

A. General concerns about the draft Guidelines

- i. Overview of our concerns
- ii. Who should make decisions about firearms in schools

B. Specific concerns about the draft Guidelines

- i. Key omissions in the draft Guidelines
- ii. When should firearms be allowed in a school (which includes comments on each of the proposed scenarios for allowing firearms in schools)
- iii. Who can possess different types of firearms, airguns and restricted weapons

C. Recommendations

We are happy to provide further information or clarification of any of the points in our submission. We wish to be advised of any developments around the draft Guidelines, and to be involved in any further consultation on firearms in schools.

A. General concerns about the draft Guidelines

i. Overview of our concerns

The draft Guidelines are flawed in a number of respects, as outlined below, and appear to be an attempt to legitimise the presence of firearms in schools and to normalise a gun culture among students of the sort that has led to tragedies in schools in other countries.

The purpose of Guidelines on firearms in schools must be to ensure the safety and welfare of all students and staff, including minimising the risk of injury or death from an accidental firearms discharge or deliberate shooting - the most obvious way to do that is to ensure that firearms are only permitted in schools in extremely limited circumstances.

The draft Guidelines blur the distinction between military weapons and firearms used for sports shooting by, for example, outlining scenarios where combat weapons may be taken into schools by the armed forces.

There is no relevant background information provided for the consultation that would have been helpful for submitters to take into account, such as how many firearms are currently kept on school property; how many students and staff are involved in, for example, sports shooting during school time; or the number of schools that have firing ranges (see comment in section B.ii below).

We appreciate the value and importance of firearms safety instruction, and that some students wish to be involved in sports shooting, but neither of these requires the presence of firearms on school property - schools, except in extremely limited circumstances, must be firearms-free zones.

ii. Who should make decisions about firearms in schools

The key flaw in the draft Guidelines is that they are based on the premise that Boards of Trustees (BOT) are the appropriate body to make decisions about firearms in schools: *"Boards of trustees have authority to allow the supervised presence and use of firearms on school premises following consultation with their local school community."* (page 4). It is unclear where this authority comes from because the Education Act 1989, for example, makes no mention of firearms.

It is completely unacceptable for decisions around firearms in schools to be made by BOTs because other critical issues for the well being, physical and emotional safety, and security

of students and staff - such as building safety, who is considered suitable to teach in schools, EOTC activities, school transport, compliance with speed limits and signs around schools, and so on - are determined by nation-wide regulation or policy.

Firearms in schools must similarly be the subject of nation-wide regulation, either through National Guidelines for schools, Regulations (such as, for example, the Health and Safety at Work (Adventure Activities) Regulations 2016), or an amendment to the Education Act 1989 prohibiting firearms in schools except in extremely limited circumstances.

B. Specific concerns about the draft Guidelines

i. Key omissions in the draft Guidelines

There are several key omissions in the draft Guidelines which are outlined in this section.

Composition of the Health and Safety Sector Reference Group: the Ministry of Education consultation page states that the Health and Safety Sector Reference Group was involved in putting together the draft Guidelines, but the fact that it was expanded to include sixteen representatives from organisations involved with firearms, sports shooting and hunting¹ - organisations with a vested interest in promoting firearms - is not included either on the Ministry web site or in the draft Guidelines. Similarly, the fact that no public health experts² were involved in drafting the Guidelines is not mentioned.

Risks of lead poisoning associated with firearms use: there is no reference in the draft Guidelines to the risk of lead poisoning associated with firearms use. This is a clear risk for students and staff, because children and women of childbearing age (which obviously includes female secondary school students and staff) are particularly vulnerable to lead poisoning - the Auckland Regional Public Health Service, for example, advises that “*Young persons of school age (defined as 15 and under) and women of childbearing age should not participate in cleaning or maintenance of “dirty” areas*” of shooting ranges.³

Even a comparatively low level of firearms use increases the risk of lead poisoning - the Nelson Marlborough District Health Board, for example, recommends: “*If you are a shooter who attends an indoor shooting club frequently e.g. **one or more times per week**, you should have your blood lead level monitored by your doctor at least once a year*” [our emphasis].⁴

Furthermore, a recent US study by Laidlaw et al on firearms use, blood lead levels and potential adverse health effects found that the risk of exposure to lead (primarily from blowback of lead primer dust and bullet fragmentation particles) is as high at outdoor firing ranges as it is in indoor ranges.⁵

It is essential that National Guidelines include requirements for BOTs to minimise the risk of lead poisoning for students and staff engaged in sports or other shooting activities during school time, and to set in place blood lead level monitoring for students and staff involved.

Schools with firing ranges: there is no information in the draft Guidelines about the particular safety and security requirements for schools that have a firing range on school property.⁶ It is essential that National Guidelines include safety and security recommendations for schools that already have firing ranges, a prohibition on any new firing ranges being built on school property, and a requirement for firing ranges on school properties to be decommissioned and shooting activities moved to an off-site purpose built firing range as soon as possible.

Human rights obligations: there is no reference to the binding obligations on New Zealand as a state party to, for example, the Convention on the Rights of the Child and OPAC, which both have particular relevance to the issues around firearms in schools.

Armed police officers: there is no reference in the draft Guidelines to the permissible circumstances for armed police officers to be on school property. Any regulations or policy around the permissible circumstances for armed police to be on school property, and their conduct while there, must be included in National Guidelines.

ii. When should firearms be allowed in a school

This section provides comment on each of the sixteen scenarios where firearms may be allowed in a school (the text in italics is from the draft Guidelines, pages 6 and 7, laid out as *Situation when firearms may be allowed in school - What type of firearm - What requirements must be met?* for each scenario).

Of the sixteen scenarios, only three may be permissible - the brief transit of firearms through school property, pest control, and the use of imitation firearms as theatrical props - and only under particular circumstances as outlined for each of those scenarios below.

- **EOTC events such as clay target shooting and controlled activities on school camps - Category A firearms (sporting shotguns and rifles) and airguns -** *Whether a firearm or a airgun if the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling a firearm or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.*

EOTC involving firearms must not take place on school property, only at an off-site purpose-built firing range appropriate for the activity.

- **Firearms safety course - Category A and airguns -** *If the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling firearms or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.*

Firearms safety courses involving firearms must take place at an off-site purpose-built firing range, not on school property, under the direct supervision of a suitably qualified police officer and / or firearms safety instructor.

- ***Sponsorship*** - Nil - *What does the school allow in terms of sponsorship by businesses/ organisations involving firearms.*

Sponsorship for any school ideally would not come from any business or organisation engaged in developing, producing, selling or promoting any firearms - in particular, school sponsorship must not come from any business or organisation that is engaged in developing, producing, selling, or promoting restricted weapons.

There is a wider issue here that must also be included in National Guidelines, around school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons - whether that be prohibited firearms or weapons as defined, for example, in the Arms Act 1983, Arms (Military Style Semi-automatic Firearms and Import Controls) Amendment Act 2012, or Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984, or any other prohibited offensive weapon as defined by the police⁷; and other weapons prohibited by, for example, the New Zealand Nuclear Free Zone, Disarmament, and Arms Control Act 1987 (nuclear and biological weapons), the Chemical Weapons (Prohibition) Act 1996, the Anti-Personnel Mines Prohibition Act 1998, and the Cluster Munitions Prohibition Act 2009.

- ***Career day*** - *Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and schools policies and procedures.*

There is no legitimate reason for firearms to be brought onto school property during career days - if students are considering a career that involves the use of firearms, and it is considered essential that they view the firearms involved, their possible future employer can arrange for the students to be taken to an appropriate off-site venue where the firearms can be displayed in a safe and secure manner.

- ***Defence force visits*** - blank - *No student, parent/caregiver, volunteer or staff member may hold/ possess a restricted firearm during Defence Force visit.*

Any military activity in schools is inconsistent with the aims of education as specified in Convention on the Rights of the Child (Article 29) and in the Committee on the Rights of the Child's General Comment No. 1: 'The Aims of Education', which include the promotion of non-violence in schools, and the teaching and learning of basic skills and life skills such as the ability to resolve conflicts in a non violent manner.⁸ There are no circumstances in which it is acceptable for military weapons or combat equipment (including combat vehicles or combat helicopters) to be on school property.

- ***Auctions involving firearms*** - *(The dealer must have the correct licences and endorsements for the type of firearm.) - All firearms - A school staff member who is a firearms licence holder needs to sight the dealers firearms licence (Local Arms Officer can help with this).*

No auction, or any other activity involving the display or sale of firearms must take place on school property.

- ***School gun club*** - *Storage of Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

It is unclear if this is referring to a gun club in a school with a purpose-built firing range, but regardless, it is not appropriate for firearms to be stored in any school - any firearms used by students for sports shooting must be stored at the nearest gun club or police station with secure storage facilities. Any school gun club activities involving firearms must take place at an off-site purpose-built firing range.

- ***Pest control*** - *Category A and airguns - Destruction of pest animals such as rabbits, possums or magpies by pest control professionals outside of school hours.*

If there is no alternative means of pest control, this may be acceptable providing no students are present and all appropriate health and safety requirements are met.

- ***Inter-school shooting competitions*** - *Category A (or if at pistol club) - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

Shooting competitions must be held at an off-site purpose-built firing range, not on school property, regardless of whether or not the school has a firing range.

- ***Hostels*** - *Storage of Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

Firearms must not be stored in residential hostels, nor on any school property - any firearms used by students must be stored at the nearest gun club or police station with secure storage facilities.

- ***Legally transported firearms*** - *Category A firearms - Firearms which are being transported for use elsewhere and remain in the vehicle under the immediate supervision of the licence holder at all time.*

The brief transit of firearms through school property, for example, when picking up students for a sports shooting activity may be acceptable providing the firearms remain in the vehicle within sight of the licence holder at all times, and cannot be easily removed if the licence holder is momentarily distracted.

- ***Fundraising (Offsite event, but start/end of event hosted at school)*** - *Storage of Category A and airguns - Pig hunt, rabbit hunt, possum hunt. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

Any fundraising event, such as the examples outlined above, can start and finish at a school without those involved bringing firearms onto school property.

- ***Amusement devices - Air and pellet guns - School fairs (eg fixed pellet guns for shooting metal bunnies/ducks). Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.***

We cannot see any reason for firearms to be used for “amusement”, this simply gives children the message that firearms are for harmless fun rather than being used for a specific purpose (for example, sports shooting or hunting) with the appropriate safeguards and security in place.

- ***Imitation firearms (School plays, endorsed performers) - Imitation firearms - School plays, endorsed performers. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.***

Imitation firearms as theatrical props are acceptable providing they are readily distinguishable from actual firearms.

- ***Civil defence and emergencies - blank - Natural disasters, Defence Force helicopters landing on school grounds.***

This would be permissible only in extreme life-threatening circumstances when civilian helicopters are unavailable. Any military helicopter landing in school grounds must not be armed.

- ***Cadet forces - Category A - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.***

Cadet forces activities must not be permitted on school property, whether or not such activities involve firearms. It should be noted that the Committee on the Rights of the Child has raised issues about how the activities of the New Zealand cadet forces accord with the aims of education as specified in Article 29 of the Convention on the Rights of the Child and in the Committee’s General Comment No. 1: ‘The Aims of Education’, and on recruitment activities undertaken by the armed forces within the cadet forces.⁹

iii) Who can possess different types of firearms, airguns and restricted weapons

With regard to the section in the draft Guidelines titled ‘Who can possess different types of firearms, airguns and restricted weapons’ (page 8) which outlines the circumstances under which students can handle firearms, there is no reason for any of these firearms or weapons to be permitted on school property at any time.

We are particularly concerned that this section includes, “*specially dangerous airguns*”, “*Military style semiautomatic firearms (MSSA)*” and “*restricted weapons*”, as though there

may be circumstances in which it would be permissible for those to be on school property - there clearly are not.

C. Recommendations

1. **Nation-wide guidelines / Regulation:** our primary recommendation is that there must be nation-wide guidelines prohibiting firearms on school property except in extremely limited and clearly defined circumstances, as outlined in Section B.ii above. These can be set in place either through National Guidelines for schools, a Regulation, or an amendment to the Education Act 1989. There must be a second consultation round on draft National Guidelines or proposals for a Regulation or amendment to the Education Act.
2. **Firearms safety instruction:** the National Guidelines must state that any firearms safety instruction involving the use of firearms is take place at an off-site purpose built firing range, under the direct supervision of a suitably qualified police officer and / or firearms safety instructor.
3. **Firearms currently kept on school property:** the National Guidelines must state that any firearms currently kept on school property must be moved to the nearest gun club or police station with secure storage facilities. A register with details of the number, type etc of firearms held by schools must be created at the earliest opportunity - the register must be kept up to date, and be held by the Ministry of Education and / or the police.
4. **Risk of lead poisoning from firearms use:** the National Guidelines must include requirements for BOTs to minimise the risk of lead poisoning for students and staff engaged in sports or other shooting activities during school time, and to set in place blood lead level monitoring for students and staff involved.
5. **Schools with firing ranges** - the National Guidelines must include safety and security recommendations for any school that has a firing range, a prohibition on any new firing ranges being built on school property, and a requirement for any firing range on school property to be decommissioned and shooting activities moved to an off-site purpose built firing range as soon as possible. Decommissioning must follow a safe process to reduce any risk of lead poisoning and of any lead residue being left behind.
6. **Armed police officers:** any regulations or policy around the permissible circumstances for armed police to be on school property, and their conduct while there, must be included in National Guidelines.
7. **Sponsorship:** the National Guidelines must prohibit any school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons - whether that be prohibited firearms or weapons as defined, for example, in the Arms Act 1983, Arms (Military Style Semi-automatic Firearms and Import Controls) Amendment Act 2012, or Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984, or any other prohibited offensive weapon as

defined by the police¹⁰; and other weapons prohibited by, for example, the New Zealand Nuclear Free Zone, Disarmament, and Arms Control Act 1987 (nuclear and biological weapons), the Chemical Weapons (Prohibition) Act 1996, the Anti-Personnel Mines Prohibition Act 1998, and the Cluster Munitions Prohibition Act 2009.

8. Military weapons and combat equipment: the National Guidelines must prohibit the presence of any military weapons or combat equipment (including combat vehicles or combat helicopters) on school property, with the sole exception of unarmed military helicopters or vehicles being permitted on school property in extreme life-threatening circumstances when civilian helicopters or vehicles are unavailable.

9. Human rights obligations: the National Guidelines must refer to the Convention on the Rights of the Child and the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict.

Thank you for your attention to our submission.

Edwina Hughes,
Coordinator, Peace Movement Aotearoa

11 April 2018

References

¹ See, for example, 'When should New Zealand schools have guns?', Marie Russell, 28 March 2018, http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12021116

² As at note above

³ 'Minimising Lead Exposure in Shooting Club Ranges', Auckland Regional Public Health Service, http://www.arphs.govt.nz/Portals/0/Health%20Information/HealthyEnvironments/HasardousSubstances/Lead%20for%20shooters/Health%20advice%20and%20recommendations-Operators_Version%2008%2011%2011.pdf

⁴ 'Health Advice for Indoor Shooters', Nelson Marlborough District Health Board, <https://www.nmdhb.govt.nz/assets/Uploads/Health-Advice-for-Indoor-Shooters.pdf>

⁵ 'Lead exposure at firing ranges - a review', Mark A. S. Laidlaw et al, *Environmental Health*, 2017 (16:34), <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-017-0246-0>

⁶ See, for example, Wentworth College and Primary, <http://www.wentworth.school.nz/college/sports/air-pistol-shooting>

⁷ As listed at <http://www.police.govt.nz/advice/firearms-and-safety/prohibited-offensive-weapon>

⁸ Committee on the Rights of the Child, General Comment No. 1: The Aims of Education (CRC/GC/2001/1), 17 April 2001, paragraphs 8 and 9 in particular

⁹ Committee on the Rights of the Child, Concluding Observations on New Zealand's initial OPAC report (CRC/C/OPAC/CO/2003/NZL), 5 November 2003, paragraph 8

¹⁰ As at note 7

From:
To: [Health & Safety Info](#)
Subject: Sub 86 - Guns in Schools
Date: Wednesday, 11 April 2018 1:53:41 p.m.

From:
Subject: Guns in Schools
Date: 11 April 2018 12:40:13 pm NZST
To: healthandsafety.info@education.govt.nz

There should be a policy of no guns allowed in a school or on school grounds. Pupils should be taught of the dangers in the use of guns/weapons in cadet force or hunting club environments, not in a school where peaceful and non violent ways of conflict resolution and NZ 's peace keeping role should be taught. Promoting weapons of war is a mistake both ethically and educationally.

From: kate@chch.planet.org.nz
To: [Health & Safety Info](#)
Subject: Sub 87 - Submission to Consultation on Draft Guidelines for schools re Firearms Policy
Date: Wednesday, 11 April 2018 2:53:12 p.m.

To Whom it may concern:

Our organisation, the Disarmament and Security Centre (DSC) based in Christchurch, was very involved in developing guidelines for Peace Studies in New Zealand Schools over many decades. Dr Dewes has also taught Peace Studies at the University of Canterbury for over 20 years.

The DSC therefore opposes asking Boards of Trustees to allow any school students to be involved with firearms on premises or outside school premises.

We believe there is no valid reason for any guns to be in New Zealand schools.

1. Here are some key omissions in the draft Guidelines :

Composition of the Health and Safety Sector Reference Group: the Ministry of Education consultation page states that the Health and Safety Sector Reference Group was involved in the draft Guidelines, but the fact it contains so many representatives of organisations involved with firearms, sports shooting and hunting (as mentioned in section 2 above) is not included either on the Ministry web site or in the draft Guidelines.

Risks of lead poisoning associated with firearms use: there is no reference in the draft Guidelines to the risk of lead poisoning associated with firearms use. This is a clear risk for students and staff, because children and women of childbearing age (which obviously includes female secondary school students and staff) are particularly vulnerable to lead poisoning - the Auckland Regional Public Health Service, for example, advises that "Young persons of school age (defined as 15 and under) and women of childbearing age should not participate in cleaning or maintenance of "dirty" areas" of shooting ranges.⁶

Even a comparatively low level of firearms use increases the risk of lead poisoning - the Nelson Marlborough District Health Board, for example, recommends "If you are a shooter who attends an indoor shooting club frequently e.g. **one or more times per week**, you should have your blood lead level monitored by your doctor at least once a year" [our emphasis].⁷

Furthermore, a recent US study by Laidlaw et al on firearms use, blood lead levels and potential adverse health effects found that the risk of exposure to lead (primarily from blowback of lead primer dust and bullet fragmentation particles) is as high at outdoor firing ranges as it is in indoor ranges.⁸

It is essential that the Guidelines include requirements for BOTs to minimise the risk of lead poisoning for students and staff engaged in sports or other shooting activities during school time, and to set in place blood lead level monitoring for students and staff involved.

Schools with firing ranges: there is no information in the draft Guidelines about the particular safety and security requirements for schools that have a firing range on school property.⁹ It is essential that the Guidelines include safety and security recommendations for schools that already have firing ranges, a prohibition on any new firing ranges being built on school property, and a requirement for firing ranges on school properties to be closed and shooting activities moved to an off-site purpose built firing range as soon as possible.

Human rights obligations: there is no reference to the binding obligations on New Zealand as a state party to, for example, the Convention on the Rights of the Child and the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict (OPAC) which both have particular relevance to firearms in schools.

Armed police officers: there is no reference in the draft Guidelines to the permissible circumstances for

armed police officers to be on school property.

Here are some reasons for opposing the use of any firearm in schools:

The 'When it might be legitimate to allow student involvement with firearms' section in the draft Guidelines (pages 6 and 7) begins with an introduction that includes: *"There are a range of circumstances where boards might choose to allow firearms onto their premises, or have students involved with firearms outside school premises - such as for careers days, work experience and Anzac Day celebrations"* (celebrations?!).

The section has a table with sixteen scenarios where firearms may be allowed in a school, and comments on each scenario are provided below (the text in italics is from the draft Guidelines, laid out as *Situation when firearms may be allowed in school - What type of firearm - What requirements must be met?* for each scenario)

- **EOTC [Education Outside The Classroom] events such as clay target shooting and controlled activities on school camps** - *Category A firearms (sporting shotguns and rifles) and airguns - Whether a firearm or a airgun if the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling a firearm or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.*

EOTC involving firearms must not take place on school property, only at an off-site purpose-built firing range appropriate for the activity.

- **Firearms safety course** - *Category A and airguns - If the student is under 18 and does not have a firearms licence they must be under immediate supervision (of a person who holds a current firearms licence with the correct endorsements) at all times if handling firearms or airguns. If the person does not have a firearms licence they must be under immediate supervision at all times if handling firearms.*

Firearms safety courses must take place at an off-site purpose-built firing range, not on school property, under the direct supervision of a suitably qualified police officer and / or firearms safety instructor.

- **Sponsorship** - *Nil - What does the school allow in terms of sponsorship by businesses/ organisations involving firearms.*

Sponsorship for any school ideally would not come from any business or organisation engaged in developing, producing, selling or promoting any firearms - in particular, school sponsorship must not come from any business or organisation that is engaged in developing, producing, selling, or promoting restricted weapons.

There is a wider issue here that must also be included in the Guidelines, around school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons - whether that be prohibited firearms or weapons as defined, for example, in the Arms Act 1983, Arms (Military Style Semi-automatic Firearms and Import Controls) Amendment Act 2012, or Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984, or any other prohibited offensive weapon as defined by the police¹⁰; and other weapons prohibited by, for example, the New Zealand Nuclear Free Zone, Disarmament, and Arms Control Act 1987 (nuclear and biological weapons), the Chemical Weapons (Prohibition) Act 1996, the Anti-Personnel Mines Prohibition Act 1998, and the Cluster Munitions Prohibition Act 2009.

- **Career day** - *Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and schools policies and procedures.*

There is no legitimate reason for firearms to be brought onto school property during career days - if students

are considering a career that involves the use of firearms, and it is considered essential that they view the firearms involved, their possible future employer can arrange for the students to be taken to an appropriate off-site venue where the firearms can be displayed in a safe and secure manner.

- **Defence force visits** - blank - *No student, parent/caregiver, volunteer or staff member may hold/ possess a restricted firearm during Defence Force visit.*

Any military activity in schools is inconsistent with the aims of education as specified in Convention on the Rights of the Child (Article 29) and in the Committee on the Rights of the Child's General Comment No. 1: 'The Aims of Education', including the promotion of non-violence in schools, and the teaching and learning of basic skills and life skills such as the ability to resolve conflicts in a non violent manner.¹¹ There are no circumstances in which it is acceptable for military weapons or combat equipment (including combat vehicles or combat helicopters) to be on school property.

- **Auctions involving firearms** - *(The dealer must have the correct licences and endorsements for the type of firearm.) - All firearms - A school staff member who is a firearms licence holder needs to sight the dealers firearms licence (Local Arms Officer can help with this).*

No auction, or any other activity involving the display or sale of firearms must take place on school property.¹²

- **School gun club** - *Storage of Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

It is unclear if this is referring to a gun club in a school with a purpose-built firing range, but regardless, it is not appropriate for firearms to be stored in any school - any firearms used by students for sports shooting must be stored at the nearest gun club or police station with secure storage facilities.

- **Pest control** - *Category A and airguns - Destruction of pest animals such as rabbits, possums or magpies by pest control professionals outside of school hours.*

If there is no alternative means of pest control, this may be acceptable providing no students are present and all appropriate health and safety requirements are met.

- **Inter-school shooting competitions** - *Category A (or if at pistol club) - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

Shooting competitions must be held at an off-site purpose-built firing range, not on school property, regardless of whether or not the school has a firing range.

- **Hostels** - *Storage of Category A and airguns - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.*

Firearms must not be stored in residential hostels, nor on any school property - any firearms used by students must be stored at the nearest gun club or police station with secure storage facilities.

- **Legally transported firearms** - *Category A firearms - Firearms which are being transported for use elsewhere and remain in the vehicle under the immediate supervision of the licence holder at all time.*

The brief transit of firearms through school property, for example, when picking up students for a sports shooting activity may be acceptable providing the firearms remain in the vehicle within sight of the licence holder at all times, and cannot be easily removed if the licence holder is momentarily distracted.

- **Fundraising (Offsite event, but start/end of event hosted at school)** - Storage of Category A and airguns - Pig hunt, rabbit hunt, possum hunt. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.

Any fundraising event, such as the examples outlined above, can start and finish at a school without those involved bringing firearms onto school property.

- **Amusement devices** - Air and pellet guns - School fairs (eg fixed pellet guns for shooting metal bunnies/ducks). Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.

We cannot see any reason for firearms to be used for "amusement", this simply gives children the message that firearms are for harmless fun rather than being used for a specific purpose (for example, sports shooting or hunting) with the appropriate safeguards and security in place.

- **Imitation firearms (School plays, endorsed performers)** - Imitation firearms - School plays, endorsed performers. Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.

Imitation firearms as theatrical props are acceptable providing they are readily distinguishable from actual firearms.

- **Civil defence and emergencies** - blank - Natural disasters, Defence Force helicopters landing on school grounds.

This would be permissible only in extreme life-threatening circumstances when civilian helicopters are unavailable. Any military helicopter landing in school grounds must not be armed.

- **Cadet forces** - Category A - Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and school policies and procedures.

Cadet forces activities must not be permitted on school property, whether or not such activities involve firearms. It should be noted that the Committee on the Rights of the Child has raised issues about how the activities of the New Zealand cadet forces accord with the aims of education as specified in Article 29 of the Convention on the Rights of the Child and in the Committee's General Comment No. 1; and on recruitment activities undertaken by the armed forces within the cadet forces.¹³

Who can possess different types of firearms, airguns and restricted weapons: there is a further section in the draft Guidelines titled 'Who can possess different types of firearms, airguns and restricted weapons' (page 8) which outlines the circumstances under which students can handle, for example, "specially dangerous airguns", military style semiautomatic firearms (MSSA)" and "restricted weapons" - we cannot see any reason why any of these should be permitted on school property at any time.

Thank you for your consideration.

Sincerely,

Dr Kate Dewes and Commander Robert Green RN (Ret'd)
Disarmament and Security Centre
P O Box 8390
Christchurch 8440
Aotearoa/New Zealand
www.disarmsecure.org

Consultation on draft guidelines for schools developing a firearms policy

My submission on the draft guidelines is as follows.

Position

I am a former secondary school teacher who is opposed to guidelines being provided to schools with regard to the presence and/or use of firearms on their premises. Whether or not firearms should be present in a particular school should not be a decision for Boards of Trustees to make but should be the subject of a national policy, as are other matters relevant to the wellbeing, physical and emotional safety, and security of students and staff. The national policy should be that firearms are not permitted in schools and that any firearms training for school students occurs elsewhere.

I would like to see this consultation period extended by one month to enable more members of the education sector and the general public to provide their views.

Reasons

The "Draft guidelines for schools developing a firearms policy" states at page 4 that "Schools are a core part of our community and social structure and are important settings for promoting health and wellbeing through education, policies and modelling best behaviour." Introducing firearms in schools is not consistent with promoting health and wellbeing.

The guidelines also state that "All schools are required to provide a lawful and safe physical and emotional environment for students and staff." Safety with regard to firearms in schools is only ensured if firearms are not permitted in schools.

There are no legitimate reasons for firearms in schools:

- (a) Firearms safety courses and sports shooting can take place at an independent gun club that is not associated with any school.
- (b) Shooting competitions are held at an off-site purpose-built firing range, not on school premises.
- (c) If students are considering a career that involves the use of firearms, the potential employer can arrange for students to view firearms elsewhere.
- (d) Any military activity in schools is inconsistent with the aims of education, as specified in:
 - (i) the Convention on the Rights of the Child (Article 29):

"Article 29 (Goals of education): Children's education ...should encourage children to respect others, human rights and their own and other cultures. It should also help them learn to live peacefully, protect the environment and respect other people."

(ii) the Committee on the Rights of the Child's General Comment No. 1: "The Aims of Education" at paragraph 8 "Education must also be provided in a way that ... promotes non-violence in school," and paragraph 9 "Education must also be aimed at ensuring that essential life skills are learnt by every child ... Basic skills include ... the ability to make well-balanced decisions; to resolve conflicts in a non-violent manner..."

(e) There are no circumstances in which it is acceptable for military weapons or combat equipment to be present in a school. In civil defence and other emergencies, military helicopters may need to land in school grounds, but they must be unarmed. Such a situation is covered by Defence Force protocols, and does not require a school policy.

(f) Pest control is carried out outside of school hours with no students present and is a matter for pest control professionals.

(g) Imitation firearms are not firearms.

(h) ANZAC Day events do not need to and probably should not exhibit the means of death and suffering. The purpose of such events is to remember particular wars and to renew the commitment not to engage in war.

Outcome sought

That a national policy be put in place that firearms are not permitted in schools, and that any firearms currently in schools be relocated independent gun clubs.

Concluding remarks

Enabling and condoning the presence of firearms in schools, as per the draft guidelines, would place items of harm where there are large numbers of children, thus exposing them to risk, and could make a school with firearms a target for disaffected members of the community (such members including school children), who could seize these weapons and use them to harm children, school personnel and the wider community.

11 April 2018

I share Peace Movement Aotearoa's concerns and support their recommendations.

Submission on firearms in schools

This is a submission from Quaker Peace and Service Aotearoa New Zealand, a permanent committee of the Yearly Meeting of the Religious Society of Friends, Te Haahi Tuahauwiri, charged with promoting peace and assisting the relief of suffering, in line with Friends' Peace Testimony, which has not altered significantly since 1661.

We write to express our thanks at being given the opportunity to comment on the Draft guidelines for schools developing a firearms policy: Developing policy on firearms activities/events involving students, and to provide comment.

We are concerned that the guidelines propose the devolving of decisions on firearms in schools to individual school Boards of Trustees. We see teaching on the correct place of firearms in our culture as of such crucial importance that a national policy would be more appropriate, despite the differing internal and external environments of schools around the country.

We are aware of poor teaching on gun safety leading to a trickle of fatal hunting accidents, but we believe this leads to a need to ensure children and young people learn to see firearms as extremely dangerous pieces of equipment to be used in very limited circumstances with strict controls, not as equipment to be used in competitive sporting activities, or as playthings or objects of interest to be closely examined. Where young people are likely to wish or need to become involved in hunting or pest destruction using firearms we believe the necessary rules and constraints should be taught to them by experienced and competent adults in appropriate locations off the school grounds.

We are proud of the extremely limited use of firearms currently by our police force and by our Defence Forces, and are hopeful that our view expressed in our response to the Defence Review in 2015, i.e "Our defence force needs to disarm and reorient away from the use of violence towards the building of security through more healthy, mutually respectful and egalitarian relationships within our own country and internationally" may come to fruition, so that young people interested in careers in the police force or defence forces are informed of the opportunities for constructive activities, not the use of firearms in attempts to resolve conflict, so firearms should not be brought on to school grounds to help students explore such career opportunities.

We believe our task as a nation as we commemorate the various wars we have been involved in is to grieve for all the casualties of those wars - soldiers, civilians, the bereaved and displaced, and commit to never using violence to attempt to resolve

conflict again, so that taking firearms into schools as part of Anzac Day activities is incongruent with that task and completely inappropriate. We are heartened by the number of schools where skills in non-violent resolution of conflict are actively taught, and believe this is the direction we should take in teaching children and young people, and the direction we have recently modelled and need to continue to model as a nation.

From:
To:
Subject: Sub 91 - Submission on the Draft Guidelines for Schools Developing a Firearms Policy
Date: Wednesday, 11 April 2018 3:55:34 p.m.

To whom it may concern:

In my early years, I briefly attended a school in the USA where one of our teachers, after hours and off-campus, would teach students to handle and fire guns. As a result I hold a Junior Rifleman's medal from the NRA.

Now I am a mother and grandmother, with training in early childhood education and with hope for present and future generations of the children of Aotearoa, that they will learn non-violent, peaceful ways of living together and solving disputes.

I am grateful for the opportunity to make a submission on the Draft Guidelines for Schools Developing a Firearms Policy. I also wish to be kept informed about further consultation and development of these Guidelines.

Time is short. I have carefully read Peace Movement Aotearoa's concerns, which I share, and and I support all of PMA's recommendations. For instance:

- * It seems obvious (to me, anyway) that schools - except in very limited circumstances - should be firearms-free zones. Such a policy must be set at national level, and not left to individual Boards of Trustees.
- * No firearms should be stored on school premises
- * When I learned to shoot a rifle, no one mentioned any possibility of lead poisoning. This consideration alone should lead any Guidelines to prohibit any use of firearms on school property (other than limited use in pest control). Firing ranges are not an appropriate on school property.
- * Sponsorship is known to provide a feel-good advertising opportunity. There must be a ban on school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons.
- * Firearms, to some people, have a certain glamorous attraction about them. If students are seeking a career in a service which uses firearms, career promotion/demonstrations at school should not include the physical presence of firearms.

In the end, what is the hope and goal of education? Surely education should provide development so that students can go on to lead full and responsible lives. Firearms pose both obvious and hidden risks to life. They have no place at schools, except in the most limited of circumstances.

Thank you for your attention.

Ministry of Education
healthandsafety.info@education.govt.nz.

10 April 2018

Submission to Ministry of Education: *Draft guidelines for schools developing a firearms policy*

1. **I am grateful for the opportunity to comment** on the *Draft guidelines for schools developing a firearms policy* and its accompanying document *Tools and resources to support the draft guidelines for schools developing a firearms policy*. This area is of concern to New Zealanders who are concerned with the wellbeing of children including those attending pre-school, primary and secondary schools.
2. I consider myself qualified to comment on ‘traditional’ firearms culture in New Zealand and on firearms in schools. I have experience of working as both a Teacher and Headteacher in rural and urban primary schools. As well as training teachers to work with adult and child migrants I also headed the Correspondence School primary division and the Individual Programme Division finally working as a Regional Advisor for the School in South Auckland. All of these positions involved visiting families in isolated areas.
3. When I was a young person, I was trained to use a firearm safely through enrolment in a tramping club before being permitted to go tramping. This club trained would be members in all aspects of safety and while many members hunted ‘successfully’ safety was as I remember presented and accepted as a predominant concern
4. **This submission covers:** a. the capacity of primary and pre-school aged children to respond to firearms safety training; b. claims about ‘traditional’ firearms culture in New Zealand that are being used to support the use of firearms in schools; c. Reasons why a register of schools with firearms would be helpful; d. Approaches to guidelines. It concludes with recommendations.

1. **Firearms safety messages need to be given at an appropriate age.**
Learning will only be effective when the child has reached the appropriate developmental stage. Stages of learning theories developed and widely accepted by educationalists suggest that children at preschool and primary school are not at a developmental stage where they are likely to absorb and understand the consequences of firearms use. Therefore no attempt at firearms safety training should be made with this age group. Nor should they be exposed to firearms at these stages of schooling. US. research supports the conclusion that attempts to teach gun safety to pre-schoolers or primary school aged children by exposing them to paper guns and targets¹ or any other training do not discourage a child from picking up or playing with guns if they are available. Safe storage and constant adult supervision of weapons when they are out of locked storage is the only effective means of protecting children from firearms.
2. **The traditional role of firearms in New Zealand culture.** This appears to be presented as a rationale for permitting firearms in schools by shooting organisations. Firearms were not present in New Zealand primary schools in my experience, or in that of other teachers of my generation with whom I have discussed this question. Playing with toys that encouraged throwing or mimicry of shooting, such as bows and arrows and catapults were likely to create problems in the playground and classroom and were discouraged. There were no sports activities involving firearms at any of the schools in which I taught, including the rural schools.
3. **Traditional experience of boys with firearms.** Boys in rural areas or with older male relatives who hunted might be trained under their supervision to use a firearm (.22 or an airgun) from the age of nine years. They might then start shooting pest species for government bounties from the age of around fourteen. The age at which adolescents and children engage in activities involving risk, such as driving, has risen in response to research showing that this reduced injuries. The same research that has led to raising the age standards that are applied to other risky activities, such as smoking and driving also applies to the use of firearms.
4. **Lead and use of firearms:** This is a serious health issue in relation to children. The encouragement of participation in firearms sports by young women some of whom will become pregnant is particularly ironic as there is growing awareness of the impact of lead on the foetus. The use of firearms with lead shot is detrimental to the health of children and potentially pregnant women. It took decades to get lead removed from petrol and this expansion of the use of lead should not be supported.

Young women are free to choose to use firearms but schools should not encourage them to do so. The aim of equality means that this is a further reason why it is not appropriate to teach boys to use firearms in schools.

5. **Firearms training in schools would be less effective.** In the traditional situation in which fathers, or other older relatives, taught young people to use firearms on a one-to-one basis, for example, while hunting, the adult tutor was vulnerable if the young person did not pay attention to the safety training and the training was likely to take place over days. This is very different to a classroom full of children. Children and young people should see firearms only in the serious and very focused situations in which they are actually being used. Firearms are not a joke or a game. Necessarily brief lessons on firearms safety in school would likely reinforce the images of firearms and shooting as a casual part of everyday life that are now prevalent in videogames, movies and television. Considerable attention is focussing on the number of behaviourally disturbed children presenting in our schools and we should question the desirability of offering a possible outlet for the settling of grievance.
6. **School Firearms Register - storing firearms in schools:** My experience suggests that having firearms and airguns in schools would serve no useful purpose and could be unfortunate in the event of burglary or vandalism or however remote the 'settling of grievance'. (5)
In the event that any schools do store firearms on site, then a record kept by the Ministry of Education is/will be essential to prevent the possibility that there could be firearms creating problems for emergency services.
7. **Need for National Guidelines.** As a headteacher who worked with School Boards of Trustees, I was aware that they frequently found it difficult to meet the demands on their time. Producing a draft policy and genuinely consulting with parents and other community members will place an additional burden on school trustees. The Ministry of Education should develop national guidelines that schools can modify where necessary. This would not remove the requirement to consult the school's community; rather, the school could consult on the basis of the National Guideline.

Recommendations:

1. Children of the age for preschools and primary schools are not at a developmental stage where they can learn and understand the

consequences of firearms use. Therefore no attempt at firearms safety training should be made with this age group. Rather they should not be exposed to firearms.

2. There is a valid role for adult use of firearms in New Zealand society. There is no such role for the use of firearms by children and therefore firearms have no place in schools. Firearms should not be stored on school property and need only be permitted for pest control, emergencies, and imitation firearms for theatrical performance.
3. The Ministry of Education and Schools' Boards of Trustees need to learn about and act on the dangers of lead exposure in firearms and airgun use. The particular danger for young girls and women should be noted.
4. The Ministry of Education should have a register of schools which have decided to permit firearms on their premises, or anywhere students are involved in shooting sports or training. Schools should have a requirement to report to the Ministry in order that this registry is maintained.
5. A National Guideline should be developed rather than placing the burden of developing individual policies on School Trustees. There should be freedom to develop their version of the guidelines where this is required by the circumstances of the school.

ⁱ http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12021116

Dargaville Intermediate School.

Submission on Draft Guidelines for Firearms Policies for Schools

To whom it may concern,

The Dargaville Intermediate School Board has reviewed the Draft Guidelines for Firearms Policies in Schools and is pleased with the result.

This is a controversial subject and some of our parents will have reservations about activities involving our students with learning about guns.

We are pleased that it is being left up to individual boards to determine the extent (if any) that firearms are learnt about and used in their schools as this obviously needs to be a decision for each school community and parents to make.

The emphasis for our school will be on parental consent.

The draft as provided is simple and clear. We are sure it will provide a strong basis for us to develop our policies. It certainly covers a range of events we previously hadn't considered. Well done to those involved in the process.

Our only concerns revolve around the point that if we are going to allow certain types of firearms into the school that the students attending the event have, if appropriate, the ability to touch the firearms concerned under appropriate supervision. The reason for this is that as we are all aware many children are practical learners, and the ability to touch greatly enhances their experience and learning.

As an example, if we did an ANZAC display this may involve restricted weapons such as a Luger pistol, or a WWII display might have a Thompson submachine gun, or a Bren and under the current draft the children would not be allowed to touch them. And yet being able to touch and or pick them up may well stimulate lines of discussion (such as how heavy they are) and help them connect with the realities of the past.

As these guns are required to be deactivated anyway there is only the same risk as picking up any other inanimate object. And this is lawful if under the supervision of an endorsed licence holder.

And of course, if the Army are coming a large part of the interest (particularly for the boys) revolves around the vehicles and firearms which is an integral part of the experience.

Other than this we are happy that the right balance has been made with the draft in terms of balancing risks with ensuring a positive learning experience for those that have permission and will benefit from it.

Our board would like to thank the School Trustees Association and Ministry of Education for considering our submission, and their excellent work in putting the draft and tools together.

Regards

Dargaville Intermediate School Board of Trustees

10 April 2018

Ministry of Education &
NZ School Trustees Association
Sector Reference Group
healthandsafety.info@education.govt.nz



CONSULTATION ON DRAFT GUIDELINES FOR SCHOOLS DEVELOPING A FIREARMS POLICY

Thank you for the opportunity to provide feedback on the draft guidelines for schools developing a firearms policy. You've indicated the guidelines will support Boards of Trustees to understand their roles and responsibilities, ensure they meet their obligations under the Arms Act 1983, Arms Regulation 1992 and Health and Safety at Work Act 2015, and clarify situations when firearms are permitted in schools and the processes that must be followed.

The Game Animal Council is a statutory agency under the Game Animal Council Act (2013). Related to this Bill, Section 7 of the Game Animal Council Act empowers the Game Animal Council [inter alia] to promote safety initiatives for the hunting sector, including firearms safety, and to raise awareness of the views of the hunting sector. The GAC therefore has an interest in how these guidelines will impact the safe use of firearms, education and awareness of the various enforcement and enabling Acts.

The GAC's focus for this submission is on ensuring safety, proper training and supervision and education about firearms, not scaremongering. It is important to recognize that school students, whether they are licensed or not, are often in the presence of firearms, either because of their domestic circumstances, or through their personal participation in various firearm-related activities, notably hunting. Familiarity with firearms and understanding of safe firearm handling practices is extremely important for those individuals. Opportunities to achieve those outcomes in schools are therefore worth pursuing. We need to strike the right balance between a safe school environment and the rights of law abiding citizens who have a legal right to own and use firearms. Nobody wants firearms getting into the hands of the wrong people but we also don't want over the top restrictions to be placed on students and their supervisors in schools, or for overly prescriptive and resource intensive guidelines to tie up valuable curriculum time.

It is also very important that the process of writing guidelines for firearms in schools does not become a forum for revisiting ownership of firearms. Hunting and target shooting are long standing kiwi traditions and most hunters, shooters and firearms owners treat firearms with the utmost respect. A lot of the children participating in shooting activities in school sanctioned events, will come from a family of hunters so should know how important it is to use firearms safely in order to be able to continue with the privilege of owning and using a rifle. Teaching firearms training in school provides a good opportunity to move towards greater use of online training systems and practical instruction which will result in better informed hunters, from an early age.

The New Zealand Game Animal Council believes that the vast majority of New Zealand school students who are currently involved in shooting as a sport, value the privileges granted to them as firearm users. Some schools have their own rifle teams and clay target shooting teams, and local clubs provide venues for these students to practice in a safe environment, as well as sit their firearms exams. Shooting is a sport that is enjoyed by people of all genders, all ages and all physical abilities.

Training videos are available on the Mountain Safety Council Website and individual hunting organisations such as the New Zealand Deerstalkers' Association and the New Zealand Pighunting

www.nzgac.org.nz

Association have their own training programs for members. All firearms users should be able to recite the seven Firearms Safety Rules and abide by them at all times and should acquire this knowledge prior to their first opportunity to use a firearm.

The GAC is of the opinion that a 'guns in schools' policy would need to reference:

- secure storage of firearms - Access to securely stored firearms to be restricted to school staff members with a firearms licence or local police and subject to their inspection. All firearms to be stored unloaded with bullets to be kept in a separate locked safe as per the Arms Code.
- minimising risks with individuals who are known to have mental health issues.
- individual assessment of whether a student is impaired from drugs or alcohol use prior to handling and/or firing weapons of any kind.
- taking immediate steps to contact local police in the event of the burglary of any premises where firearms are known to be stored.
- the requirement for schools to sight licences of anyone bringing a firearm to school and a requirement to keep an up-to-date register of licences and firearms owned by the school.
- transport of firearms to and from school for interschool shooting competitions.
- checking firearms to ensure they haven't been modified or altered in any way that would make them illegal.
- what conditions will be attached to bowhunting, archery, use of airguns, air rifles, air pistols, BB guns, soft air pellet guns and paintball guns which do not require a firearms licence.
- how the guidelines will affect pig & possum hunt fundraising events hosted by schools.
- the need for consent forms to be signed by parents/caregivers.
- incident reports (and incidents of dangerous behavior) to be shared with local police.

The GAC supports strong penalties and stand down periods for any breach of guidelines or misuse of firearms, in line with the legislation. However, the penalties should be flexible enough to cater for wide ranging breaches, scaled from less serious to most serious. We support bringing in the Police to speak to students who breach the rules, and to advise students sitting their firearms training.

The Council is happy to accept recommendations from the Firearms Community Advisory Forum which was set up to deal with specific policy issues such as this, relating to the administration of the Firearms Act.

The GAC sees no justification for military style semi-automatic firearms (MSSA) to be on school premises unless they are brought in by NZDF personnel or civil defense personnel in the event of natural disasters &/or emergencies.

Thank you again for the opportunity to submit on the new guidelines. The GAC would like to be able to speak to this submission if you are conducting hearings. If you have any queries relating to our submission, please contact either myself on 0274885940 or Deputy Chair Geoff Kerr on 0211071064.



Don Hammond
Chair

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From:
To: [Health & Safety Info](#)
Subject: Sub 95 - Firearms in Schools Consultation
Date: Thursday, 12 April 2018 9:16:26 a.m.

Kia Ora

I am a registered teacher. There is no place in schools for firearms. I was appalled by that photo and article about Whakarongo School and wrote to staff and principal and the Board of Trustees. I did not get any replies.

I wrote to The Press and my letter was published.

I refer you to the excellent submission sent by Peace Movement Aotearoa.

<https://www.facebook.com/notes/peace-movement-aotearoa/firearms-in-schools-submission-points/1659608080753221>

As I am overseas I have not had a chance to take part in discussions so I wish to back the work of PMA.

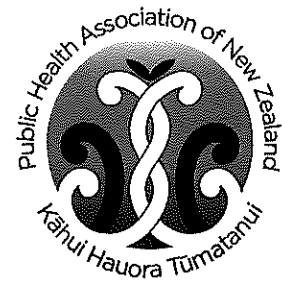
He mihi mahana ki a koe i tenei wa.
Warm greetings to you at this time.

Woodbrooke Quaker Study Centre

United Kingdom



Virus-free. www.avast.com



11 April 2018

Ministry of Education

healthandsafety.info@education.govt.nz

Consultation on draft Guidelines for Schools Developing a Firearms Policy

1. Thank you for the opportunity to make a submission on the draft Guidelines for Schools Developing a Firearms Policy (the draft Guidelines).
2. The Public Health Association of New Zealand (PHA) is a national association with members from the public, private and voluntary sectors. Our organisation's vision is 'Good health for all - health equity in Aotearoa', or 'Hauora mō te katoa – oranga mō te Ao', and our purpose is to advocate for the health of all New Zealanders.
3. To achieve this, we provide a forum for information and debate about public health action in Aotearoa New Zealand. Public health action aims to improve, promote and protect the health of the whole population through the organised efforts of society.
4. We recognise Te Tiriti o Waitangi as Aotearoa New Zealand's founding document, defining respectful relationships between tangata whenua and tangata Tiriti, and are actively committed to supporting Te Tiriti values in policy and legislation.
5. We actively support and promote full implementation of the UN Convention on the Rights of the Child (UNCROC) and the Optional Protocol on the Involvement of Children in Armed Conflict (OPAC) in Aotearoa New Zealand.
6. We fully support the submission on the draft Guidelines by the Department of Public Health, University of Otago, Wellington.

Overall concerns

7. The Ministry of Education's draft guidelines clearly recognise that 'All schools are required to provide a lawful and safe physical and emotional environment for students and staff' (1). Yet the critical question as to whether the presence of firearms on school premises should be permitted at all, and if so under what circumstances, is delegated to Boards of Trustees (BOTs).
8. Given the risks to health and safety posed by the presence of firearms on school premises, we struggle to understand why responsibility to decide on this important health and safety issue is delegated to BOTs when other such issues are decided at a national level in policy and regulations. As an example, after the November 2016 Wellington earthquake the Ministry of

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Education directed schools to close until an engineer had inspected the buildings and reported them to be safe.

9. There are several reasons why the Public Health Association considers it to be inappropriate for BOTs to determine the circumstances in which firearms should be permitted on school premises. These are:
 - a) A general lack of knowledge of the range of potential social, emotional and physical health risks, notably the health risks resulting from exposure to lead.
 - b) As elected representatives, BOTs can be susceptible to pressure from advocates for a range of uses for firearms, placing an unnecessary and potentially onerous burden on the school in response to differing community values. The list of 16 potential uses for firearms in schools contained in the draft guidelines demonstrates this diversity of views.
 - c) Under the Health and Safety at Work Act 2015, BOTs have a primary duty of care for 'providing and maintaining a work environment, plant and systems of work that are without risks to health and safety.' The Act also requires BOTs to assess and manage risks appropriately. In the case of a risk rated as extreme, that is: 'If incident were to occur, it would be likely that death or permanent injury would result' the appropriate action is to 'Consider alternatives to the activity or additional significant safety measures required.' (2) The draft Guidelines are incompatible with this level of risk management and would place BOTs in a very awkward position legally if not ethically.
10. Based on the questionable assumption that it is acceptable for schools to permit firearms in some circumstances, the Ministry has further delegated responsibility for designing guidelines to ensure the health and safety of the school environment to a Health and Safety Reference Group. This Group consists of 48 individuals representing the education sector (24), government (6 from Police, Defence, Worksafe) and 18 people from various organisations with an interest in the use of firearms, but not a single public health expert. (3) The Minister of Education has, in response to our request, agreed to appoint one person from public health. The Minister's response is appreciated, but one person with expertise in health is hardly proportionate in relation to the weight of other perspectives represented.

Public health issues related to firearms in schools

11. This lack of health expertise means that the draft Guidelines are seriously flawed. Since the purpose of the Guidelines must be to ensure the safety and wellbeing of all students and staff, the most effective (and obvious) way to achieve this and to prevent any harm from firearms (whether accidental or deliberate) is to completely ban firearms from schools.
12. The health issues arising from the presence of firearms in schools include social, emotional and physical health outcomes. The presence of firearms normalises and desensitises young people to the risks associated with guns, and the tacit promotion of a 'gun culture' similar to that of the United States of America, characterised by a belief in 'the right to bear arms', and the need for self-defence. Childhood and adolescence can be difficult for some of the most sensitive and vulnerable, and school is not always a safe place emotionally. The child who carries a knife, or any other kind of weapon, is always the most fearful - of bullying, of teacher displeasure, of domestic violence, or the inchoate threats seen on TV. Learning to handle a deadly weapon can provide an unrealistic sense of confidence, power and determination to use the most familiar weapon available.

13. Several of the circumstances justifying the presence of guns listed in the draft guidelines normalise or trivialise the risks associated with guns, such as auctions and amusement devices. It is totally inappropriate to characterise a firearm as an amusement device or a commodity equivalent to a meat pack or spa day voucher.
14. That normalisation of firearm possession perpetuates patterns of violence is apparent from the data on the correlation between high rates of gun ownership and gun violence not only against others but also self-inflicted (4). This is a particular concern in rural areas of NZ (where schools may be more likely to tolerate the presence of guns), and where 40% of suicides (the vast majority young men) are by firearms. A coroner's report concluded that 'suicide risk in farmers was exacerbated by ready access to firearms: almost 40% of farm suicides involved firearms, compared to 8% in the general population over the same time.' (5) It is very important to protect children from this normalisation process. Maintaining a school environment - where children spend most of their day - as a firearm-free zone, is a crucial way to achieve this.
15. Some groups of children are in extra special need of protection from exposure to firearms e.g. refugees and victims of gun violence. These children have already been harmed by exposure to gun violence and it is imperative that school is a safe place for them to learn and fulfil their maximum potential. As a UN report on refugee education stated: 'First and foremost, school should be a safe haven.' (6)
16. Lead poisoning is the greatest risk to physical health from handling firearms. Firearm ammunition and primer contain lead which is released as lead particles and dust on firing and can be ingested or inhaled causing lead poisoning. According to the World Health Organization there is no safe level of lead exposure (7) 'lead has toxic effects down to the lowest measurable levels.' What's more, even very low levels of exposure can be extremely serious: 'An especially striking and unexpected finding in these studies is that the association between lead and disease is proportionately greater at lower levels of exposure—a so-called supralinear dose-response relation.' (8) Women of childbearing age (which includes both schoolgirls and teachers) and younger children are particularly vulnerable to lead poisoning. (7)
17. The only justifiable reason to permit firearms in schools 'to provide a lawful and safe physical and emotional environment for students and staff' is the occasion when NZ Police determine that health and safety is threatened. Consistent with current practice, schools are instructed by Police to go into 'lockdown' on those occasions. In the rare event that a firearm is identified or reasonably suspected on or near a school, Police might decide to intervene with weapons. We note recent news media reports of a private company providing 'lockdown' training for emergencies in schools. This seems to be an eminently sensible procedure. None of these circumstances justifies anyone other than sworn police to carry a firearm.
18. The prohibition on firearms in schools that we propose needs have no impact on community-based recreational use of guns, nor their use on private property for legitimate reasons. Existing legislation requires individuals who wish to own and use guns to be licensed. This includes the gun owner's responsibility to comply with relevant legislation. Schools should never be seen to be a surrogate for gun-owners to evade their responsibilities.

Recommendations

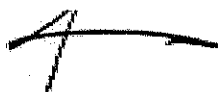
19. The draft Guidelines should state explicitly that they are based on the principles enshrined in the UN Convention on the Rights of the Child (UNCROC) and the Optional Protocol on the Involvement of Children in Armed Conflict (OPAC) to which New Zealand is a signatory. Article 19 of UNCROC

requires the state to take all appropriate measures, including educational, to 'protect the child from all forms of physical or mental violence' (9) And OPAC calls for special protection for the rights of children and for children's 'development and education in conditions of peace and security,' (10)

20. The draft Guidelines should also explicitly mention the Sustainable Development Goals and be consistent in particular with SDG 4 Quality Education. One of its targets is to 'ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, *promotion of a culture of peace and non-violence ...*' (our emphasis) and another target is to 'Build and upgrade education facilities that are child, disability and gender sensitive and *provide safe, nonviolent, inclusive and effective learning environments for all.*' (our emphasis) (11)
21. Accordingly, firearms should be totally banned from schools and all other education facilities (except as outlined in paragraph 17 above).
22. In the meantime, the Ministry of Education should immediately establish a register of all schools with firearms. This register must be appropriately secured to prevent any illegal access.
23. In the event that legislation continues to permit the presence of firearms in schools in some circumstances, Ministry of Education should develop national guidelines on the management of every school's obligations for health and safety.

We are happy to provide any clarification on matters covered in our submission.

Yours sincerely,



Warren Lindberg
Chief Executive Officer

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2018-04/004
T:D102

11 April, 2018

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Tēnā koutou

Draft guidelines for schools developing a firearms policy

The New Zealand Nurses Organisation *Tōpūtanga Tapuhi Kaitiaki o Aotearoa* (NZNO) welcomes the opportunity to briefly comment on the above consultation document, which is directly relevant to nurses working with and within schools; professionally relevant to the nursing profession in relation to child and adolescent health, particularly mental health; and more widely relevant to the social determinants of health. This submission is informed by consultation with members and staff, including school nurses and members of the College of Child & Youth Nurses, the College of Primary Health Care Nurses and Mental Health Nurse Section, te Rūnanga o Aotearoa and professional nursing, research and policy advisers. NZNO has also consulted with health sector colleagues and warmly supports the Public Health Association's submission.

NZNO **does not support** the Ministry's draft guidelines, or any school developing a narrowly focused firearms policy. We recommend instead that the Ministry directs its energy to providing comprehensive and consistent guidelines for *all* educational facilities including early childhood centres, primary and secondary schools and tertiary institutes, to develop a policy to support mental health and wellbeing, and reject violence and offensive weapons. Schools, like hospital and other public places, should be violence- and weapon-free at all times.

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About the New Zealand Nurses Organisation

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 49,000 nurses, midwives, students and health workers on professional and employment-related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand.

Firearms are not the issue

NZNO takes the view that violence is a serious public health issue, and that a systemic, d integrated approach that aligns health, education, social development and justice policies is needed. Although nurses confront, and are at times subjected to, violence in the course of their work, it is comparatively rare, and contact with firearms is rarer still. School nurses estimate that about 1-3% of their work involves treatment of serious harm from assault with a weapon, often knives but, more commonly, "whatever comes to hand" eg a hammer from the woodwork room, a chair or a desk. However, the mental and physical health of young people is significantly affected by other forms of violence - domestic and family violence, bullying, threats and intimidation, peer pressure, etc - the impact of which is indicated by high rates of youth depression, anxiety, suicide and ...more violence.

The overriding priority for schools must be to ensure a safe, violence-free space, and to support the mental health and wellbeing of students and staff. The development of a firearms policy is a 'red herring', and a dangerous one, as it focuses attention on a minute risk, while ignoring the larger one, and effectively legitimises firearms in schools. We think it likely that an unintended consequence will be to encourage schools to consider how they could include firearms in their programmes, for instance to attract interest from students.

Although we are somewhat protected in Aotearoa from, for example war and access to weapons in comparison with other countries, we shouldn't forget that we are living in a very uncertain world, with

climate change, new technologies, and accelerating social changes which threaten traditional social structures and the planet, nor that we are on the edge of a region which has already seen significant conflict and where certainly international tensions between political giants are being played out.

Exposure to, and the threat of, violence whether directly, or through news and social media and entertainment can be disturbing, stressful and depressing for children growing up. The physical presence, and normalisation of weapons inevitably reinforces negative concepts, for instance that weapons are common or necessary, that problems are settled through conflict, that people are powerless. Conversely, acting to stop violence, to deliberately articulate the rejection of weapons and violent behaviour, and to affirm peace and justice, can be reassuring and inspire hope and confidence in the future. Given our current rates of youth suicide and issues with mental health, we suggest the Ministry should be sending very clear messages that weapons have no part in the school curriculum, but that education to support resilience, wellness and positive social relationships is integral to all learning environments.

A comprehensive education policy

The legal framework for firearms is very clear. The Ministry should clarify that firearms and other offensive weapons may not be taken into any educational institute under any circumstance. This is consistent with rules for other public spaces including hospitals, airports, courtrooms etc. A single policy for all learning environments is necessary to reinforce a single and consistent message that violence is unacceptable in any circumstance. Contrary to the 'no gun' policies that prevailed in all our early childhood centres (kindergartens, play centres etc) late last century, it is disturbing to find that 'Evolve' early childhood "learning" centres (a US education model) have introduced toy gun kits to 'teach' children 'gun safety'. For this reason we advocate that any policy regarding weapons apply to both private and public preschools as well as primary and secondary schools. No preschooler needs to learn 'gun safety' because no preschooler should be exposed to guns in a school, any more than primary or secondary students need to be. We urge the Ministry to act immediately to ban the toy gun kits and stop this unnecessary and culturally insensitive and inappropriate education.

In conclusion, NZNO **recommends** that you:

- do not proceed with the guidelines;

- demonstrate leadership by clarifying that no offensive weapon is allowed in any learning and education centre; and
- develop guidelines for schools to develop policies which support mental health and wellbeing and eschew violence.

Nāku noa, nā

U

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From: [Phil Walker](#)
To: [Health & Safety Info](#)
Subject: Sub 98 - Submission on draft school firearms policy
Date: Wednesday, 11 April 2018 5:01:28 p.m.

Kia ora,

I am making this submission on the draft school firearms policy on behalf of the Houghton Valley School Board of Trustees.

Our perspective is that there is no reason for the presence of firearms on school premises. We have deep concerns about the draft policy as currently drafted. We do not feel the policy, as currently drafted, adequately addresses the question of why it would be necessary or reasonable to store firearms on school premises. This places too much agency with Boards of Trustees to govern and manage storage of firearms on school premises without adequate guidance to inform that decision making or management process. This raises a question about the overarching duty of care held by the Ministry of Education to ensure the overall safety of New Zealand school children on school premises.

The policy references schools wishing to operate a gun club at a local shooting range, but doesn't explain why this activity necessitates firearm storage on school premises. Similarly the policy references having firearms on school premises for the purposes of a careers day, however doesn't articulate why it isn't possible to communicate the nature and options of various careers without having firearms present. Similarly the policy references firearms auctions being held on school premises without articulating any rationale for this activity being an appropriate use of publicly funded school premises. This aspect of the policy needs significant strengthening if Boards of Trustees are to use the guidance in the policy to govern decision making around the presence of firearms on their school's premises.

The key roles and responsibilities table doesn't mention any responsibility for the Ministry of Education. It would be useful to document any mechanism, or intent, to audit or otherwise scrutinize individual board's firearms policies, or adherence to those firearms policies and it may be the Ministry of Education has a key role to play in this.

it would be a better approach to construct a policy that excluded firearms from New Zealand School premises, and outlined an exceptions process where the presence of firearms could be considered on a case by case basis. This process would need to ensure rigor around the necessity for firearms on school premises, and weigh any contribution to student well being from the presence of firearms against appropriate management of risk.

Nga mihi

Phil Walker.

From:
To: [Health & Safety Info](#)
Subject: Sub 99 - No Firearms In Schools - National Policy Urgently Needed
Date: Wednesday, 11 April 2018 5:07:16 p.m.

To Whom it May Concern,

This submission objects fundamentally to the ludicrous suggestion that guidelines are needed for schools so they can develop a policy for firearms in schools, and also objects to the foolish notion that an individual school board ought to be able to institute a firearms policy in their school. A school is never a place for firearms. No firearms ought to ever be held on school premises anywhere in New Zealand. The risks are too many and too fundamental, ranging from deliberate misuse to tragic accidental use, with both having the potential to end in serious injury or death of a child. This is however now a matter of national policy urgently needing to be set for the future safety of all New Zealand children, regardless of where they go to school. It's not a matter that can be delegated to individual schools whose trustees may not have the knowledge or training to understand the full impact of the risks associated with firearms around children.

This idea that school boards and their trustees can set a firearms policy potentially allowing firearms on school premises must be stopped in its tracks immediately. The focus instead needs to be about more important educational matters, like teaching children essential life skills (reading, writing, maths, etc) that they need as adults. Handling a firearm is not an essential life skill by any stretch of the imagination. There is a reason why one must be 18 years of age to have a firearms licence. There are many other things one needs to learn in life before learning how to handle a weapon. The only policy needed is that firearms are never allowed on any school premises. If schools wish to hold events of a sporting nature that includes firearms, they can do so by visiting a properly licensed location with properly trained staff after obtaining parental consent. It is ludicrous to enable a school board to force a situation of armed premises onto parents who may not wish for their children to have such knowledge, nor access.

If schools wish to train students in using firearms (but why would they when the kids can't legally use them until adult), they can obtain parents' consent to take such students to a properly equipped and licensed location where adults who are properly trained and licensed to hold firearms and to educate others about the same can instruct them. A day out like any other day out to a specific location with specific skills and trained professionals. A school is not a place for firearms. Ever. If Police, or the Defence Force wish to educate school students about their work, there is no need for them to bring weapons along to do so. Both these highly skilled professions avoid using firearms to the outmost extent and would not need to bring them into a school environment to educate students about their work.

Firearms are weapons. As such, a matter of life and death. There is no reason whatsoever that weapons need to be on school premises at all at any point in time ever other than in a tragic criminal emergency situation handled by qualified skilled adults with licences who are trained to handle such emergency situations (Police, Defence Force).

The notion that schools can arm themselves - regardless of the words used to justify such armoury - runs contrary to New Zealand being a country of peace with a thorough vetting process for obtaining a firearms licence. That this matter is being considered at all by the Ministry of Education at a time when New Zealand students struggle to learn how to read, write and do maths - statistically falling behind much of the rest of the developed world - is a depressing and worrying indication of the mindset currently present at the Ministry of

Education. How can a weapons in school policy possibly be a priority?

The logic is obvious. Introduce the ability for school boards to introduce firearms in schools and some will do so, and some schools will keep them on their premises. Parents sending their children to their local school will not necessarily know that the school has such a policy. This itself is a serious breach of duty of care towards our children and citizens, and a health and safety hazard of epic proportions.

Individual school boards - comprised of citizens not heavily vetted for trustee positions - setting such school firearms policy, introducing a significant risk to the lives of children attending such schools, also creates an inconsistency across the national education system. Suddenly we have schools with weapons and schools without weapons. We are not talking cooking classes, or yoga here. We are talking about schools being able to hold weapons on premises attended by children daily. Schools sadly get broken into on occasion. Students sadly sometimes hold gripes against schools. If a school holds weapons, it must declare it to be so. Then we are dealing with a situation of locals knowing that weapons are held at a school. Schools are not exactly fortresses. This opens another can of worms where weapons held may be abused well outside the scope of intended use, regardless of best naive intentions.

There is a reason why we have such stringent rules around weaponry in New Zealand. Peace, also known as national safety. The idea that different schools have different policies concerning weaponry is abhorrent. The idea that some schools can hold firearms and others not creates a new problem for parents in deciding which school to send their child to. The long term consequences are dire, where we might end up in a situation where certain parents send their children to certain schools precisely because they can be trained in using weapons. How is that educating for peace? This is a matter of national educational policy to ensure consistency and safety across all New Zealand schools. The policy needs to be that firearms are never allowed on school premises, no exceptions. The policy needs to be that no school can have its own firearms policy, but that for national safety and peace the rule about firearms is set at the highest level and applies to all schools. Only then do we have a fair and equal and safety-oriented educational system, abstaining from teaching children about weapons until they are legal adults and can explore such knowledge themselves. Only by having a national policy that rejects firearms in schools can we hold our hands on our hearts and truly say we are doing our best to preserve peace and keep our children safe from harm while at school.

We cannot risk individual schools deciding to hold firearms on school grounds, no matter what words they use to justify arming themselves. We must not introduce a policy that enables school trust boards to set firearms policy. The basic rule is simple: no guns, no firearms, no weaponry allowed on school premises. If this matter proceeds, there will inevitably be a media storm as this matter becomes more public, which it will. Peace organisations in New Zealand, which include former and current military and police staff, all reject this suggestion that guidelines are needed for school boards to be able to develop a firearms policy on the grounds that no firearms are ever needed in schools and children do not need to learn about firearms. It is safe to say that the wider community will agree. Please stop this nonsense and help schools focus on improving education for our children.

Regards,

healthandsafety.info@education.govt.nz
Parliament Buildings
Wellington

11th April 2018

Re: Feedback on firearms in schools

Please note my opposition to the presence of firearms in schools for any purpose other than in the hands of trained security guards for the protection of the school and all of its students and staff. The idea of permitting firearms in schools in the hands of either students or staff is pure anathema to me as clearly supporting weapons in a school environment is sending a completely wrong message too students. In an age where peace is essential for human survival, the last thing we want to do is support any policy that poses a threat to the safety of our student population.

The whole question of firearms in schools is of such importance that it requires national guidelines and should not be in the decision-making realm of boards of trustees where the danger exists that mixed guidelines would be applying throughout the country. As far as I can see there are no scenarios that justify accepting the presence of firearms in schools apart from the aforementioned protection of the school environment.

Once draft national guidelines are drawn up there should of course be further consultation on them.

From:
To: Health & Safety Info
Subject: Sub 101 - No firearms In Schools - National Policy Urgently Needed
Date: Wednesday, 11 April 2018 5:41:39 p.m.

To Whom it May Concern,

This submission objects fundamentally to the ludicrous suggestion that guidelines are needed for schools so they can develop a policy for firearms in schools, and also objects to the foolish notion that an individual school board ought to be able to institute a firearms policy in their school. A school is never a place for firearms. No firearms ought to ever be held on school premises anywhere in New Zealand. The risks are too many and too fundamental, ranging from deliberate misuse to tragic accidental use, with both having the potential to end in serious injury or death of a child. This is however now a matter of national policy urgently needing to be set for the future safety of all New Zealand children, regardless of where they go to school. It's not a matter that can be delegated to individual schools whose trustees may not have the knowledge or training to understand the full impact of the risks associated with firearms around children.

This idea that school boards and their trustees can set a firearms policy potentially allowing firearms on school premises must be stopped in its tracks immediately. The focus instead needs to be about more important educational matters, like teaching children essential life skills (reading, writing, maths, etc) that they need as adults. Handling a firearm is not an essential life skill by any stretch of the imagination. There is a reason why one must be 18 years of age to have a firearms licence. There are many other things one needs to learn in life before learning how to handle a weapon. The only policy needed is that firearms are never allowed on any school premises. If schools wish to hold events of a sporting nature that includes firearms, they can do so by visiting a properly licensed location with properly trained staff after obtaining parental consent. It is ludicrous to enable a school board to force a situation of armed premises onto parents who may not wish for their children to have such knowledge, nor access.

If schools wish to train students in using firearms (but why would they when the kids can't legally use them until adult), they can obtain parents' consent to take such students to a properly equipped and licensed location where adults who are properly trained and licensed to hold firearms and to educate others about the same can instruct them. A day out like any other day out to a specific location with specific skills and trained professionals. A school is not a place for firearms. Ever. If Police, or the Defence Force wish to educate school students about their work, there is no need for them to bring weapons along to do so. Both these highly skilled professions avoid using firearms to the outmost extent and would not need to bring them into a school environment to educate students about their work.

Firearms are weapons. As such, a matter of life and death. There is no reason whatsoever that weapons need to be on school premises at all at any point in time ever other than in a tragic criminal emergency situation handled by

qualified skilled adults with licences who are trained to handle such emergency situations (Police, Defence Force).

The notion that schools can arm themselves - regardless of the words used to justify such armoury - runs contrary to New Zealand being a country of peace with a thorough vetting process for obtaining a firearms licence. That this matter is being considered at all by the Ministry of Education at a time when New Zealand students struggle to learn how to read, write and do maths - statistically falling behind much of the rest of the developed world - is a depressing and worrying indication of the mindset currently present at the Ministry of Education. How can a weapons in school policy possibly be a priority?

The logic is obvious. Introduce the ability for school boards to introduce firearms in schools and some will do so, and some schools will keep them on their premises. Parents sending their children to their local school will not necessarily know that the school has such a policy. This itself is a serious breach of duty of care towards our children and citizens, and a health and safety hazard of epic proportions.

Individual school boards - comprised of citizens not heavily vetted for trustee positions - setting such school firearms policy, introducing a significant risk to the lives of children attending such schools, also creates an inconsistency across the national education system. Suddenly we have schools with weapons and schools without weapons. We are not talking cooking classes, or yoga here. We are talking about schools being able to hold weapons on premises attended by children daily. Schools sadly get broken into on occasion. Students sadly sometimes hold gripes against schools. If a school holds weapons, it must declare it to be so. Then we are dealing with a situation of locals knowing that weapons are held at a school. Schools are not exactly fortresses. This opens another can of worms where weapons held may be abused well outside the scope of intended use, regardless of best naive intentions.

There is a reason why we have such stringent rules around weaponry in New Zealand. Peace, also known as national safety. The idea that different schools have different policies concerning weaponry is abhorrent. The idea that some schools can hold firearms and others not creates a new problem for parents in deciding which school to send their child to. The long term consequences are dire, where we might end up in a situation where certain parents send their children to certain schools precisely because they can be trained in using weapons. How is that educating for peace? This is a matter of national educational policy to ensure consistency and safety across all New Zealand schools. The policy needs to be that firearms are never allowed on school premises, no exceptions. The policy needs to be that no school can have its own firearms policy, but that for national safety and peace the rule about firearms is set at the highest level and applies to all schools. Only then do we have a fair and equal and safety-oriented educational system, abstaining from teaching children about weapons until they are legal adults and can explore such knowledge themselves. Only by having a national policy that rejects firearms in schools can we hold our hands on our hearts and truly say we are doing our best to preserve peace and keep our children safe from harm while at school.

We cannot risk individual schools deciding to hold firearms on school grounds, no matter what words they use to justify arming themselves. We must not introduce a policy that enables school trust boards to set firearms policy. The basic rule is simple: no guns, no firearms, no weaponry allowed on school premises. If this matter proceeds, there will inevitably be a media storm as this matter becomes more public, which it will. Peace organisations in New Zealand, which include former and current military and police staff, all reject this suggestion that guidelines are needed for school boards to be able to develop a firearms policy on the grounds that no firearms are ever needed in schools and children do not need to learn about firearms. It is safe to say that the wider community will agree. Please stop this nonsense and help schools focus on improving education for our children.

Regards,

From: [WILPF Aotearoa](#)
To: [Health & Safety Info](#)
Subject: Sub 102 - WILPF's submission on the draft guidelines for schools for developing a firearms policy.
Date: Wednesday, 11 April 2018 6:46:06 p.m.
Attachments: [WILPF Submission on Draft Guidelines for Schools Developing a Firearms Policy.docx](#)

Kia ora

please find attached WILPF's submission on the draft guidelines for schools for developing a firearms policy.

Please could you confirm that this is the correct address for provision of the submission.

The website simply asks for feedback to be submitted to this address

Ngaa mihi



Women's International League for Peace and Freedom

*United Nations Consultative status with ECOSOC, UNESCO and UNCTAD
Special relations with the ILO, FAO, UNICEF, and other organisations and agencies*

WILPF Aotearoa Section, PO Box 2054, Wellington. Email: wilpfaotearoa@gmail.com
www.wilpf.org.nz

11 April 2018

Submission on Draft Guidelines for Schools Developing a Firearms Policy

WILPF Aotearoa is the Aotearoa/New Zealand section of the WILPF International, an international women's organization established in 1915. WILPF works for peace by non-violent means to achieve a more just and equal world, free from weapons and war.

WILPF Aotearoa is strongly of the view that there should be no guns in schools and that a national position is stated to this effect. The existing convention of no guns in schools must remain, as is currently widely understood among our members and we believe, the public at large. Any shift from this position must only follow in-depth, independent research regarding education and training related activities that involves firearms of any description, military or non-military.

If, following in-depth, independent research, it is found that there is the need, a national exceptions-based policy that provides for schools to apply for firearms related training and education for a very narrow range of activities could be developed. Any such activities should be exceptions rather than the norm, and where granted must be subject to close monitoring and reporting.

WILPF Aotearoa does not support the regularization of firearms in schools in any shape or form because of insidious effects of normalizing gun use. Children have a right to be protected and educated in a protective environment that actively promotes non-violent conflict resolution.

Any parent that wishes their child or children to be educated about firearms and their use can do so through sports clubs that have the relevant expertise. No parent is denied that possibility. However, introducing firearms instruction in schools turns this around and means that any parents not wanting their children subjected to firearms training will have to seek an exemption. It is WILPF's view that most parents understand schools as free of guns in with regard to education and training (emergencies that involve armed offenders are not an education related function) and do not want guns introduced in schools for any reason. Consultation on a 'guns in schools' policy assumes that guns will be in schools. A consultation process based on this assumption is flawed.

More specifically, the draft guidelines are flawed in their omission of key information, and appear to be an attempt to legitimise the presence of firearms in schools and to normalise a "gun culture" among students of the sort that has led to tragedies in schools in other countries.

The premise that Boards of Trustees (BOT) are the appropriate body to make decisions about firearms in schools is also flawed. Other critical issues for the well-being, physical and emotional safety, and security of students and staff - such as building safety, who is considered

suitable to teach in schools, and so on - are all determined by nation-wide regulations or policy. If, following research and consultation and decision to allow firearms in schools was agreed, it must similarly be the subject of nation-wide regulation, either through National Guidelines for schools or an amendment to the Education Act 1989.

The draft Guidelines blur the distinction between military weapons and firearms used for sports shooting by, for example, outlining scenarios where combat weapons can be taken into schools by the armed forces. Any military activity in schools is inconsistent with the aims of education as specified in Convention on the Rights of the Child (Article 29) and in the Committee on the Rights of the Child's General Comment No. 1: 'The Aims of Education', including the promotion of non-violence in schools, and the teaching and learning of basic skills and life skills such as the ability to resolve conflicts in a nonviolent manner.¹¹ There are no circumstances in which it is acceptable for military weapons or combat equipment (including combat vehicles or combat helicopters) to be on school property.

Megan Hutchings
President

From:
To: [Health & Safety Info](#)
Subject: Sub 103 - Guns in Schools Policy
Date: Wednesday, 11 April 2018 9:29:24 p.m.

To All Involved:

Very simple:

No alcohol in schools.

No drugs in schools (except first aid pharmaceuticals).

No guns in schools.

Weapons and violence permeate our culture, media and entertainment.

Schools are sanctuaries of learning, for growing healthy young humans free from fear.

Teach positive communication, conflict resolution and mediation skills. Practice peacemaking -- not how to use tools designed to kill.

Educate our children -- do not weaponise them!

Sincerely,

From:
To: [Health & Safety Info](#)
Subject: Sub 104 - Firearms in schools... no thank you
Date: Wednesday, 11 April 2018 9:20:09 p.m.

To whom it may concern,

I am writing to object to the suggestion that guidelines are needed for schools so they can develop a policy for firearms in schools. A school is not a place for firearms. No firearms should be on school premises in New Zealand. The risks are too many and too fundamental, ranging from deliberate misuse to tragic accidental use, with both having the potential to end in serious injury or death of a child. This is a matter of national policy to be set for the future safety of all New Zealand children, regardless of where they go to school. It's not a matter that should be delegated to individual schools whose trustees may not have the knowledge or training to understand the full impact of the risks associated with firearms around children.

This idea that school boards and their trustees can set a firearms policy potentially allowing firearms on school premises is not sensible or safe. Handling a firearm is not an essential life skill. If schools wish to hold events of a sporting nature that includes firearms, they can do so by visiting a properly licensed location with properly trained staff after obtaining parental consent. It is not fair or necessary to enable a school board to compel parents who may not wish for their children to have such knowledge, or access to firearms to have to do so.

If schools wish to train students in using firearms they can obtain parents' consent to take such students to a properly equipped and licensed location where adults who are properly trained and licensed to hold firearms and to educate others about the same can instruct them. A day out like any other day out to a specific location with specific skills and trained professionals. A school is not a place for firearms. If Police, or the Defence Force wish to educate school students about their work, there is no need for them to bring weapons along to do so. Both these highly skilled professions avoid using firearms and would not need to bring them into a school environment to educate students about their work.

Firearms are weapons. There is no reason whatsoever that weapons need to be on school premises at all at any point in time ever other than in a tragic criminal emergency situation handled by qualified skilled adults with licences who are trained to handle such emergency situations (Police, Defence Force).

Introduce the ability for school boards to introduce firearms in schools and some will do so, and some schools will keep them on their premises. Parents sending their children to their local school will not necessarily know that the school has such a policy. This itself is a serious breach of duty of care towards our children and citizens, and a health and safety hazard.

The policy needs to be that no school can have its own firearms policy. We cannot risk individual schools deciding to hold firearms on school grounds. We must not introduce a policy that enables school trust boards to set firearms policy. The basic rule is simple: no guns, no firearms, no weaponry allowed

on school premises.

kind regards,

From:
To: [Health & Safety Info](#)
Subject: Sub 105 - New Zealand Ministry of Education: consultations and reviews: firearms-policy for schools consultation
Date: Wednesday, 11 April 2018 8:49:11 p.m.

New Zealand Ministry of Education: consultations and reviews: firearms-policy for schools consultation

As a retired school teacher, mother, grandmother and third-generation-born Kiwi, I was appalled by the NZ Army in early 2017 taking assault weapons into Whakarongo School for 'so-called' leadership training and allowing children to handle these weapons. I, along with most of my contemporaries, have always assumed that guns were never permitted on any school premises. So the initiative of the previous Minister for Education to draft guidelines to prevent a re-occurrence of the Whakarongo episode was most welcome, as was the decision of the new government to complete the process.

But the document is deeply disappointing. Sadly the draft Guidelines appear to be an attempt to legitimise the presence of firearms in schools and to normalise a "gun culture" among students, of the sort that has led to tragedies in schools in other countries.

The key flaw in the draft Guidelines is that it is based on the premise that Boards of Trustees are the appropriate body to make decisions about firearms in schools. This is completely unacceptable because other critical issues for the well-being, physical and emotional safety, and security of students and staff - such as building safety, who is considered suitable to teach in schools, and so on - are determined by nation-wide regulations or policy. Firearms in schools must similarly be the subject of nation-wide regulation, either through National Guidelines for schools or an amendment to the Education Act 1989, and therefore under the responsibility of the Ministry for Education.

There is no relevant background information provided for the consultation, such as how many schools have firearms, how many students and staff are involved in, for example, sports shooting during school time; or the number of schools that have firing ranges. Therefore I believe there should be an urgent review of all of the above and that all guns and live ammunition should then be immediately removed from all school premises to the nearest gun club or police station with secure storage facilities.

The draft Guidelines blur the distinction between military weapons and firearms used for sports shooting by, for example, outlining scenarios where combat weapons can be taken into schools by the armed forces.

In terms of Human Rights obligations, there is no reference to the binding obligations on New Zealand as a state party to, for example, the Convention on the Rights of the Child and the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict (OPAC) which both have particular relevance to firearms in schools.

Re armed police officers: there is no reference in the draft Guidelines to the permissible circumstances for armed police officers to be on school property.

Any military activity in schools is inconsistent with the aims of education as specified in Convention on the Rights of the Child (Article 29) and in the Committee on the Rights of the Child's General Comment No. 1: 'The Aims of Education', including the promotion of

non-violence in schools, and the teaching and learning of basic skills and life skills such as the ability to resolve conflicts in a nonviolent manner. There are no circumstances in which it is acceptable for military weapons or combat equipment (including combat vehicles or combat helicopters) to be on school property.

There is no legitimate reason for firearms to be brought onto school property during career days - if students are considering a career that involves the use of firearms, and it is considered essential that they view the firearms involved, their possible future employer can arrange for the students to be taken to an appropriate off-site venue where the firearms can be displayed in a safe and secure manner. (Arms Act 1983 and Arms Regulations 1992, Health and Safety at Work Act 2015 and schools policies and procedures.)

Sponsorship for any school ideally should not come from any business or organisation engaged in developing, producing, selling or promoting any firearms - in particular, school sponsorship must not come from any business or organisation that is engaged in developing, producing, selling, or promoting restricted weapons. There is a wider issue here that must also be included in the Guidelines, around school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons - whether that be prohibited firearms or weapons as defined, for example, in the Arms Act 1983, Arms (Military Style Semi-automatic Firearms and Import Controls) Amendment Act 2012, or Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984, or any other prohibited offensive weapon as defined by the police ; and other weapons prohibited by, for example, the New Zealand Nuclear Free Zone, Disarmament, and Arms Control Act 1987 (nuclear and biological weapons), the Chemical Weapons (Prohibition) Act 1996, the Anti-Personnel Mines Prohibition Act 1998, and the Cluster Munitions Prohibition Act 2009.

I acknowledge the work of PMA (Peace Movement Aotearoa) in providing the background research for many of the above points of my submission.

Sent from Mail for Windows 10

From:
To: [Health & Safety Info](#)
Subject: Sub 106 - Guns in schools
Date: Wednesday, 11 April 2018 8:23:11 p.m.

As a parent, grandparent and (retired) high school teacher, I absolutely oppose any introduction of gun culture into New Zealand schools. Teachers work so hard to create a safe learning environment for our students and to teach the skills of co-operation, negotiation and working constructively with others.

We do not want an organised gun lobby with their self-interested agenda attempting to move in to our schools.

Schools benefit children. Guns do not.

From:
To: [Health & Safety Info](#)
Subject: Sub 107 - Firearms in schools guidelines
Date: Wednesday, 11 April 2018 7:38:45 p.m.
Attachments: [image001.png](#)

Hi there

In regard to the draft policies they look like good.

As a licence holder, former clay target shooting coach and Principal I think it is important to note that clay target shooting and small bore rifle shooting are Olympic and Commonwealth Games sports and therefore need to be supported by schools as NZ Secondary School competitions exist. Amongst the guidelines it would be advisable that guns are always transported in the school grounds in gun bags or cases so that firearms are not viewed made up as this is what causes people anxiety if they have never viewed or used real firearms.

Thank you for the opportunity to comment on the draft guidelines.

Regards

From:
To: [Health & Safety Info](#)
Subject: Sub 108 - Submission : Firearms in schools policy
Date: Wednesday, 11 April 2018 9:31:08 p.m.

Kia ora

I am writing in support of Peace Movement Aotearoa's submission on this matter.

Please take into serious consideration the following points.

Thank you

1. Nation-wide guidelines / Regulation: our primary recommendation is that there must be nation-wide guidelines prohibiting firearms on school property except in extremely limited and clearly defined circumstances, as outlined in Section B.ii above. These can be set in place either through National Guidelines for schools, a Regulation, or an amendment to the Education Act 1989. There must be a second consultation round on draft National Guidelines or proposals for a Regulation or amendment to the Education Act.
2. Firearms safety instruction: the National Guidelines must state that any firearms safety instruction involving the use of firearms is take place at an off-site purpose built firing range, under the direct supervision of a suitably qualified police officer and / or firearms safety instructor.
3. Firearms currently kept on school property: the National Guidelines must state that any firearms currently kept on school property must be moved to the nearest gun club or police station with secure storage facilities. A register with details of the number, type etc of firearms held by schools must be created at the earliest opportunity - the register must be kept up to date, and be held by the Ministry of Education and / or the police.
4. Risk of lead poisoning from firearms use: the National Guidelines must include requirements for BOTs to minimise the risk of lead poisoning for students and staff engaged in sports or other shooting activities during school time, and to set in place blood lead level monitoring for students and staff involved.
5. Schools with firing ranges - the National Guidelines must include safety and security recommendations for any school that has a firing range, a prohibition on any new firing ranges being built on school property, and a requirement for any firing range on school property to be decommissioned and shooting activities moved to an off-site purpose built firing range as soon as possible. Decommissioning must follow a safe process to reduce any risk of lead poisoning and of any lead residue being left behind.
6. Armed police officers: any regulations or policy around the permissible circumstances for armed police to be on school property, and their conduct while there, must be included in National Guidelines.
7. Sponsorship: the National Guidelines must prohibit any school sponsorship by any business or organisation that is engaged in developing, producing, deploying, or promoting any prohibited weapons - whether that be prohibited firearms or weapons as defined, for example, in the Arms Act 1983, Arms (Military Style Semi-automatic Firearms and Import Controls) Amendment Act 2012, or Arms (Restricted Weapons and Specially Dangerous Airguns) Order 1984, or any other prohibited offensive weapon as defined by the police; and other weapons prohibited by, for example, the New Zealand Nuclear Free Zone, Disarmament, and Arms Control Act 1987 (nuclear and biological weapons), the Chemical Weapons (Prohibition) Act 1996, the Anti-Personnel Mines Prohibition Act 1998, and the Cluster Munitions Prohibition Act 2009.
8. Military weapons and combat equipment: the National Guidelines must prohibit the presence of any military weapons or combat equipment (including combat vehicles or combat helicopters) on school property, with the sole exception of unarmed military helicopters or vehicles being permitted on school property in extreme life-threatening circumstances when civilian helicopters or vehicles are

unavailable.

9. Human rights obligations: the National Guidelines must refer to the Convention on the Rights of the Child and the Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict.

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