

11 OCT 2016

Redcliffs School BoT response to MoE Education Report October 10, 2016

This is the Redcliffs School Board of Trustees' (the Board's) response to the Ministry of Education's report dated 28 September 2016 headed *Feasibility and Psychosocial Investigation for Redcliffs School* (The Education Report).

The Education Report concerns two independent lines of enquiry. They are:

- A further investigation into the potential psychosocial implications for children attending school at the Main Road site with the proposed mitigation measures in place; and
- A feasibility analysis on whether relocation within a reasonable timeframe to another site within the Redcliffs community is likely to be a realistic option.

The Board's position

(i) Return to the Main Road site

The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible.

The Board's view is based on the fact that there are no objective reasons why the school should not return to the Main Road site. The psychosocial assessments comprehensively conclude that issues relating to the site are minor and can be managed by the Board, school management team and staff, and the school community.

No other issues remain relevant to the assessment, all having been dealt with in previous Board submissions and Education Reports.

The Redcliffs' school community has waited patiently for the results of this further enquiry, and there now appears to be no reason why the school should not return to its original site.

Psychologists' Report

The synthesis of the experts' opinions relating to psychosocial matters concerning the Redcliffs Main Road site, prepared by C MacDonald, drew the following comment by Dr Harith Swadi, which we believe to be a succinct summation of the key themes and opinions expressed in all four of the expert reports:

For the current residents of Redcliffs, and with the mitigation in place, it is highly likely that there will not be a significant amount of psychological stress and/or distress as a result of a return to the old school site. That will be influenced by how confident, engaged and empowered the community feels about the mitigation measures. How this is communicated to the community is the key. Given the level of engagement and trust the School and the School Board has with the community, I believe it is possible for that to be achieved.

The Board and the wider Redcliffs community have demonstrated overwhelming support for Redcliffs School and its place in our community. The Board remains committed to providing a level of engagement which will ensure a positive and vibrant return of the school to its Main Road site for the long term.

Mitigation strategies and procedures for psychosocial matters

The Board has already started to develop strategies and procedures to support the recommendations raised in the psychosocial report. (Appendix 1)

These strategies and procedures will sit within the normal governance and management framework of the school. The Board considers that the plan detailed below will become a core part of the school's normal consultation processes and development of policies, procedures, and its strategic, annual and curriculum plans.

Timeframes

The Board believes Redcliffs School can be returned to the Main Road site as soon as the bund can be constructed. The Board has received a revised cost and programing estimate from Fulton Hogan Canterbury which suggests that the bund can be constructed within 5 months. (Appendix 2)

The school community has not sought an entirely new school as part of this exercise. Its primary focus has been to retain a school in Redcliffs and to return as soon as possible, given the five years already off site. As recognised in the previous education reports, roll growth will be limited while Redcliffs School is located outside its "home" suburb and restricted to the limited space available at Van Asch.

The Board believes that given the existing school roll, the remaining buildings on site could be used to operate the school without the immediate need for major renovations or development. That could be done within the timeframe required for the construction of the bund. This idea was discussed with Ministry staff during a meeting on 30 September and received a positive response. The Board requests that this option be given serious consideration.

The Board proposes that in the near future, a master planning process be established to allow for further development to accommodate the future roll growth which will occur as a result of the re-establishment of the Main Road site and the regeneration of Redcliffs as a suburb. That does not, however, need to occur prior to occupation of the existing buildings.

This approach will provide certainty for the school community, will significantly reduce the time required to return to the Main Road site, and will be the least costly outcome for the Crown. It will allow the school and the community to focus on the return to the site.

(ii) Alternative site

The Board's view is that an alternative site should not be considered until the Main Road site is properly evaluated.

If, contrary to the Board's view, sufficient grounds to abandon the Main Road site do exist, then the Board's main concerns are that we are:

- Provided with a thorough analysis of why the conclusions reached by the psychosocial experts should be rejected;
- Given certainty that a replacement school at an acceptable alternative site will be achieved;
- Given certainty that the Main Road site will not be disposed of before an acceptable alternative site is definitively acquired so that the option of returning to the Main Road site is preserved in the meantime;
- Provided with a clear and reasonable time-frame within which the school will be established on an alternative site;
- Advised by the Ministry how Redcliffs School will be supported to ensure it is able to remain a vibrant and thriving school at Van Asch in the meantime.

The Board also believes that the community will have strong views about these matters. As part of this process, consultation with the community is needed. That has not yet occurred and is still required.

(iii) The process and further consultation

The Board wishes to express its view that this most recent process has been deficient. In the Board's view, the Ministry has only engaged with a small number of Board members (by its own request) in conducting this investigation. It has also amended the process in the midst of proceedings, often at short notice. This did not fulfil the Board's expectations of the process, which were shaped by the Minister's letter to the Board dated 7 July 2016, in which the Minister stated:

"The Ministry will work with your Board to ensure that you as well as the wider community have the opportunity to have input into these pieces of work. This is not a formal consultation process as the Ministry is only gathering information at this stage."

In FAQs distributed to the wider community the Ministry repeated the statement that the process being conducted was about information gathering. The Ministry re-iterated that it *"would also like to hear from the school community and the wider Redcliffs Community."*

A key example of the Board's concerns about this process is seen in the timeframes for comment. The Ministry provided a draft copy of parts of the Education Report to the Board late in the evening of Wednesday 28 September during the first week of the school holidays. It required the Board's reply by Sunday 2 October, allowing only four days for the extensive analysis and feedback required. As well, the report that the Ministry did provide was incomplete, and severely redacted, forcing the Board to respond without access to key information.

The Board has endeavoured to reply as soon as practicable and in as much detail, but has not been able to meet the original deadline. The depth of the Board's reply has been constrained by the timeframes demanded by the Ministry and the lack of access to the full report.

Upon asking, the Ministry has informed the Board that it expects the Minister will make some sort of final decision upon receipt of the Education Report. The Ministry has stated *"there would not be an 'interim' decision in the current process, so it's important that you provide everything that you wish the Minister to consider in your response to the report"*.

The Board strongly objects to this proposed approach and believes that it conflicts with the Minister's statements about the process made in July. The Board has raised this verbally with the Ministry.

Furthermore, at the Ministry's request, the contents of the work commissioned by the Ministry (including the psychosocial reports and the property reports) have not to date, been widely disseminated. The Ministry has taken the position that its work should be properly developed first prior to wider consultation.

The Board has accommodated this stance in good faith, believing that further community consultation would follow. However, to date that consultation has not occurred. The school community, potentially affected residents, and sports and community groups who may be directly affected by a re-location proposal, have not been informed of the proposal.

The Ministry also requested that the Board agree to terms of confidentiality before being allowed to see any part of the Education Report for comment. The Board agreed to this on the basis that it was keen to see movement forward on the process. The Board's terms of acceptance of the Ministry's demands were, however, on the basis that the Minister would allow an opportunity for public comment once the Minister has considered the Education report.

The Board, therefore, expects that the community will be given an opportunity to see the information that has been gathered by the Ministry's process and to provide comment.

Board comments on the Education Report (with redactions)

(i) MoE process and rationale for an alternative site

The Ministry has stated at paragraph 2 of the Education Report that the rationale for the two investigations (psychosocial and alternative site feasibility) is as follows.

"If the school could be relocated, this would address both the Board's concerns about potential negative psychosocial effects that closure could have on the community, as well as the possible negative effects for children if the school returned to the Main Road site... An alternative site could also mean that the school did not have to compromise its space and would not have to manage the ongoing risks posed by the cliffs. It would mean that future generations of Redcliffs children would be able to go to school on an ordinary site, where they would not have to deal with the threat of ongoing rockfall behind the site."

Board response

The Board disagrees that this statement can amount to a valid rationale for the investigations. The Board has been concerned that throughout this process the Ministry's representatives have appeared to assume that a return to the existing Main Road site is unacceptable. The Board is concerned that the statement above indicates a clear bias towards relocation. We believe such a bias to be an unsound basis for any balanced Ministerial enquiry or decision making process relating to the future of Redcliffs School site.

The Board further wishes to clarify that at no time had it been advised that the Ministry's representatives view the above statement as the **purpose** of the Education Report, until we received the draft report on 28 September. Given the clear bias of the report, the Board asks the Minister to put aside this, and other preconceived assumptions about the site when assessing the Education Report and when making any decision about the future of the school's location.

The quoted statement above starts from an assumption that relocation is the preferred outcome. It also assumes that there would be negative effects on children if the school returned to the Main Road site. It goes on to assume that the occupation of other alternative sites would not require management of physical "risks" relating to cliffs : It concludes with a further assumption that ongoing rockfall behind the site is in fact a "threat" that would have to be "dealt with" by future generations of Redcliffs children.

The Board is concerned that the statement said by the Ministry to be the rationale for the two investigations (psychosocial and site) is laden with emotive language which, in itself, limits any properly objective, fact-based exploration of the issues involved.

The statement ignores the years of work which has already gone into assessing the physical nature of the Redcliffs School Main Road site, which itself led to the Minister's own agreement that the physical characteristics of the site can be appropriately managed to allow a school safely to operate from the site.

This statement also appears to close off any real prospect of a dispassionate assessment of the work provided by the psychologists engaged to carry out further investigation into the potential psychosocial implications for children attending school at the Main Road site with the proposed mitigation measures in place.

Furthermore, the statement fails to give any value to an important aspect of the psychosocial investigation, in particular, the instruction to the psychologists to investigate appropriate strategies for dealing with psychological risk on the site.

The Board is concerned that the Ministry has modified its approach as work has progressed, without any structured feedback from the Board, but in a way that is consistent with what appears to be a bias towards relocation.

Moreover, at the Board's meeting with the Ministry on 30 September 2016, Ministry staff acknowledged that Redcliffs Park (Option C site) may also require some form of rockfall mitigation work and ongoing monitoring. No formal investigation or design of those requirements has occurred yet. It should therefore not be assumed that this potential alternative site removes the need for mitigation or monitoring measures, as stated in the above comment. Those matters are simply unresolved. Commonsense would, however, indicate some work will be required.

In addition the Ministry initially refused to allow the psychosocial limb of the investigation to extend to any other school or site in the area. The Ministry was insistent that the enquiry stand alone, specific to the Main Road site (see para 30 Education Report). The psychologists involved, with the exception of Dr Gordon (based in Australia), visited the Main Road site and the wider Bays Cluster area in August. They had the opportunity to be shown the potential alternative sites, however the Ministry chose not to do so.

Then, very late in the process, as Redcliffs Park (site C option) emerged as the preferred alternative site, the Ministry arranged (without any prior notice to the Board) for some of the psychologists who had prepared the assessments of the Main Road site, to visit the Redcliffs Park site and provide their views. No discussion had occurred with the Board and no instructions were developed as a frame of reference for the experts. Given the late notice, only one of the original report writers would have been able to participate. The Board raised concerns about the process, indicating it would participate with an approved terms of reference developed a matter of days prior to the proposed site visit. But ultimately the Ministry abandoned the proposal, again without further discussion with the Board, and as a result no psychosocial analysis of any alternative site has occurred.

Redcliffs Park (site C) is much closer to cliff faces than any school buildings on the Main Road site are, or will be. The Board's view is that the psychosocial issues at both sites are likely to be similar and that the sort of support and normalisation of the environment recommended by the experts would need to occur irrespective of the site, simply because of the nature of the physical environment surrounding. The Board does not accept that this issue supports a preference for one site over another and is simply an environmental background issue which can and will effectively be managed by the school and the wider community over time.

The Ministry initially also refused to carry out any comparative analysis of the Main Road site within the same decision making matrix used by the Property Group to assess other sites arguing that the attributes of the Main Road site are already known.

The Ministry has, however, embarked on some comparative assessment relating to costings and flood and tsunami risk very late in the process. The Ministry engaged an external report relating to flooding risk prepared by Tonkin and Taylor dated 28 September forming appendix 7 to the Education Report. The Board was not consulted about the terms of reference of that report and only learned of it when it was provided with the draft Education report on the 28 September. The Ministry has also included comparative costings and timelines in the Education Report relating to the Main Road site, without any prior discussion with the Board.

The Board's view is that if a full comparative assessment of the Main Road site and the alternative sites were carried out, the Main Road site would prove to be the preferred site on all counts. For the reasons outlined below, however, the Board says that approach is not necessary or appropriate given the frame of reference established by the Minister.

(ii) The Purpose of two enquiries – the Board's view

The Board's view is that the Minister should engage in a two-step enquiry.

The Minister has already accepted that the physical attributes of Main Road site are acceptable for continued use as a school. The only issue raised as a last remaining hurdle to return to the site was the assessment of the further investigation into the potential psychosocial implications for children attending school at the Main Road site with the proposed mitigation measures in place.

The first enquiry for the Minister is, therefore, to assess whether the psychosocial assessment raises any objective significant reasons to retreat from the Main Road site, sufficient to support a decision of such significance.

It is only if that conclusion can properly be reached that any assessment of an alternative site for the school should occur.

(iii) The outcome of the first enquiry – the psychosocial assessment

As stated in the Board's position, the Board's view is that there are no reasons why the school should not return to Main Road site. The psychosocial assessments comprehensively conclude that issues relating to the site can be managed.

The Board remains concerned that the Ministry has not portrayed the outcome of the psychosocial reports fairly in the Education Report. The Ministry appears to accept that the primary finding is that any psychological issues arising can be managed. This conclusion is very clear in the synthesis of the reports, and as mentioned earlier the Board have already taken steps to act on these recommendations.

The Board is unclear about the Ministry's view concerning the remaining issue relating to the small number of children who may have general underlying anxiety. The Board in no way wishes to ignore this point or to imply that it would not fully support these children and their families.

The Board does, however, feel that the context of this issue needs to be carefully borne in mind. To that end the Board believes that the section in Dr Gordon's report headed "Anxious children and Parents" is critical. In this section Dr Gordon states that 'this problem would need to be responded to as a problem of an anxiety prone child rather a threat from rockfall...once one generation have gone through the school it is likely the rockfalls and the bund will become a normalised part of school routine.'

(iv) Other issues relating to a return to site

The Board believes that Redcliffs School can be returned to its Main Road site more quickly and at a significantly lower cost than a re-location to any other site.

The Board would like to work with the Ministry to develop a process so that the existing buildings on site could be used to operate the school without the immediate need for major renovations or development in the immediate term. That could be done within the timeframe required for the construction of the bund.

The Board proposes that in the near future, a master planning process be established to allow for further development to accommodate the future roll growth which will occur as a result of the re-establishment of the Main Road site and the regeneration of Redcliffs as a suburb.

That outcome will give the community a short term return to site combined with a medium term programme of rejuvenation to participate in and look forward to.

The Board also believes that a return to the Main Road site carries with it fewer uncertainties than a re-location for the following reasons:

- No process to acquire land is required.
- Greater cost control can be achieved because there will be fewer exclusions from the current alternative site cost estimates relating to
 - Removal of contaminated soil and other hazardous materials (in addition to the allowances within the budget),
 - Relocation of existing in-ground services

- Upgrade of council infrastructure services (this is likely to include significant road safety improvements due to the location of the proposed Redcliffs Park site being on the opposite site of Main Road, a major arterial, to the majority of students)
- Development levies and reserve contributions
- Legal and finance costs
- The overall timeframe including final redevelopment is likely to be shorter enabling more accurate whole of life costings to be developed.
- The option would provide greatest flexibility with the current school roll being fully accommodated within existing buildings, and the opportunity to build in a staged, planned approach as the roll grows. This may include providing additional capacity prior to it being required in order that buildings can be vacated for retrofitting modern learning environments by moving students into new buildings as they are constructed.

Whilst it is acknowledged that the Minister has not requested cost as a consideration in establishing whether a return to site is acceptable (psychosocial considerations are stated as the only potential barrier to investigate), the Ministry has provided comparative costs for both a full rebuild on site, and a partial rebuild and refurbishment. The costings provided by the Ministry for the refurbishment are not considered appropriate for the return to the Main Road site for the following reasons:

- The Board have obtained an estimate for construction of the bund of 820k as opposed to the 1.5 million estimated in the Property Report
- The programming estimate for bund construction would also be reduced to five months
- Redacted in line with s9(2)(i) and s9(2)(j) OIA
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These points reduce the costs of returning to the existing site significantly, in refurbished buildings with far fewer uncertainties.

Appendix 8 of the last Board submission explains that the current proposed location of the bund conservatively allows 1.44Ha, giving up 0.85Ha behind the bund. The location of the bund was chosen to be beyond any potential future rock fall under a total cliff collapse. The bund does not serve any physical purpose for any ongoing minor rock fall (which has been occurring continuously through natural erosion ever since the formation of the cliffs).

Using the Ministry guidelines, the site as proposed will accommodate 314 students, with only 1,200m² required to bring the site up to 400 capacity. This could be achieved through further investigation of the bund location, or adjacent property purchase. Much of the land behind the bund is suitable for residential development and so could be used to offset, or neutralise, any land purchase adjacent to the existing site if this is required.

In addition it should be noted that area recommendations are usually reserved for greenfield school developments and should not be, and are not, applied to the redevelopment of an existing site as evidenced by the recent redevelopment of Lyttelton School

Conclusions

The Board's view is that the Minister should confirm that the school will return to its original site at Main Road and should allow that to occur as soon as possible.

As referred to above, if an alternative site is established as necessary or preferable the Board believes that the following are critical conditions which should be confirmed:

- To have certainty that a replacement school at an acceptable alternative site will be achieved. The community would need to be provided with as much information as possible to give certainty that a school at an alternative site will be achieved. We also request the Minister indicate whether the Government intends to expedite the process using any legislative options which may be available.
- To have certainty by way of a clear undertaking from the Ministry that the Main Road site will not be disposed of before an acceptable alternative site is definitively acquired so that the option of returning to the Main Road site is preserved in the meantime,
- To have a clear and reasonable time-frame within which the school will be established on an alternative site;
- To be provided with necessary undertakings/confirmation from the Ministry as to the specific financial support which Redcliffs School will be provided with to enable it to remain a vibrant and thriving school at Van Asch in the meantime. As an absolute minimum the Board believes that the level of funding received by the school for the 2016 year should be confirmed as the base level of funding for the school while it remains at Van Ash until it returns to another site.

Communications plan [DRAFT]

Managing psychosocial perceptions of rockfall risk on Redcliffs School site.

Background

The following document outlines the proposed communications to specifically address any concerns regarding the safety of the return to the Main Road school site and covers two communication and consultation projects:

- a) The initial return to the Main Road site, and
- b) The ongoing communications to future school users and community members

This plan draws on the expertise and recommendations of the four psychologists engaged to make recommendations to the Ministry of Education regarding any psychological and psychosocial impacts of perceived rockfall threat.

It recognises that comprehensive mitigation will be put in place and the risk of rockfall on the school site will be negligible and creates no greater risk than any other activity. It also employs the opinions of the experts who unanimously agree that a child's appraisal of risk is dependent on their education and preparation, and on the reactions of parents and teachers.

In writing this communications plan, we are guided by the expert opinion of Dr Gordon that any concerns arising from children's subjective appraisals of rockfall can be actively responded to within the context of the normal curriculum and in specific responses to falls as they occur.

The advice provided by the experts on how to develop effective communications has been used throughout this communications plan. The technical reporting, images and 3D viewer developed as part of the Board's submission has already proven to be powerful in technical communication, and will be used in ongoing communications. This strategy was confirmed by Dr Swadi, who noted that he would feel it is safe to send his children to school at Redcliffs, largely because he had the opportunity to see the evidence, weigh it and discuss it with the experts, and that any concerned parent should be able to have a similar experience.

This plan ensures there are resources in place to provide clear information to minimise the uncertainty of a natural hazard and help minimise any risk of anxiety.

Objectives

- Ensure there is open communication between adults and children about the geotechnical environment we live in, including cliffs, rockfalls and the school bund.

- Clearly communicate the outcomes of the geotechnical reports and the process the school went through to ensure the site was safe to occupy and that the threat of disruption to learning was mitigated.
- Allow the community to make balanced appraisals of the situation by providing all of the facts
- Provide a conduit for ongoing communication of concerns for students and other members of the school community

Audience / key stakeholders

Current school community:

Teachers
Parents
Children of different ages
Wider Redcliffs community

Future enrolments:

Parents and children

Projects

1. Return to site:

In preparing to return to the Main Road site, the Board agrees that the following tools will be used to communicate with our audiences:

Community consultation

As recommended by Dr Sawdi, the community will be empowered to advise the school of the information they would like to receive and how they would like to receive it¹. The outcome of this consultation will inform the final version of the school's communication plan.

On site open day

Once the site mitigation measures including the bund are in place, a community open day will be held. This will include presentations on the geotechnical mitigations that have been put in place

"Our environment" video

A video will be created outlining the unique geographical location of Redcliffs, and demonstrating the modelling work done to ensure the safety of the school site, clearly showing that the risk is no greater than any other activity. This video will be shared with the school and wider community, and posted on the school's Facebook page. It will be hosted on the school website and will be a valuable resource for new students and their families.

2. Ongoing future communications

In preparing for day-to-day operations on the Main Road site, the Board agrees that the following tools will be used to communicate with our audiences:

¹ Dr Harith Swadi: Independent Opinion – Redcliffs School Main Road Site

School welcome pack

Redcliffs School provides a welcome pack to every new family joining the school. This welcome pack will include detailed and iterative FAQs about the school's location and links to the video and other material.

Website

Redcliffs School website will provide an accessible platform for communications about the school site. It will include detailed iterative FAQs and the "Our Environment" video.

Frequently Asked Questions

Responses to these questions will be included in the School Welcome Pack, on the school website and in the video.

- Why did the school relocate to another site?
- What are the natural hazard risks at the Main Rd site?
- Why is it safe to return to the Main Rd site?
- What is the risk of rockfall?
- What are the mitigation measures?
- What was the process the school went through to return?
- What is the extent of expert opinion sought regarding the school's return to Redcliffs?
- Where will the school rebuild / why will it rebuild on the road-side of the property?
- How can I talk to my children about the geotechnical safety of the site?

The FAQs will be continually updated as new questions and requirements of students become apparent.

Pedagogical Tools:

Annual curriculum plan

As recommended by Dr. Gordon, age appropriate teaching about the geotechnical aspects of Redcliffs School will become part of the school's curriculum, consistent with understanding the features of the environment. Teaching in this way normalises the situation and removes the risk of children making uninformed subjective appraisals of the risk situation. Families will be part of the consultation about "what and how" this information will be communicated and this will be reviewed on a regular basis.

Outside agencies

The Schools-based Mental Health team provides pro-active outreach support in addressing child and youth mental health issues in Canterbury in the post earthquake recovery stage. School staff will identify children who need further support and pastoral care and will make referrals to this service where appropriate. This team will provide teaching staff with evidence-based interventions that will enhance resiliency for any children with anxieties. Teachers will work with individual children and families to provide accurate information so that any misconceptions and subsequent anxieties are mitigated.

Conclusion

There is general agreement amongst the experts that "a child's psychological adaptation to challenges, including possible exposure to the sight and sound of rockfall, is related to his or her psychosocial context. Families and schools are critical in shaping this context, and this relationship can be strengthened to improve children's wellbeing."

Appendix 2



ESTIMATE

Tuesday, 29 March 2016

Redcliff School Board of Trustees C/O Redcliff School

To The Redcliff School Board of Trustees,

1	Preliminary and General	LS	1	\$280,270.20	\$280,270.20
2	Sediment Control	LS	1	\$11,777.50	\$11,777.50
3	Initial Earthworks	m2	1600	\$50.01	\$80,016.00
4	Bund Construction	m	150	\$2,139.23	\$320,884.50
5	Ramped Earth Bund	m2	672	\$114.95	\$77,246.40
6	Swale Construction	m	160	\$93.18	\$14,908.80
7	Site Restoration	m2	1600	\$23.30	\$37,280.00

1.

RE: Redcliff School – Engineered Bund We are pleased to submit our ESTIMATE of \$822,383.40 (excluding GST) for the work described

below.

Scope of Work

Within this Estimate we have allowed to,

- Establish to site and fence off a construction area
- Install sediment and enviromental control measures
- Excavate the site and setup construction platforms

- Construct a 2m high Gabion Basket Wall 150m long
- Construct a swale drain around the back of the wall
- Shape an earth slope to 2 metres above ground level to create an amphitheatre and reduce the visual impact of the wall
- Spread topsoil over the earth slope to allow planting
- Restore any disturbance from the construction process

Special Notes The provided rates are an indicative estimate only, further information would be required prior to supply a quotation for this work. If you have any queries regarding the above, please contact us.
Yours faithfully **FULTON HOGAN LTD** Hamish Rees Excavation
Department Manager