

NOTICE OF DECISION

The Decision

I, Andrew Barr, MLA, Minister for Education and Training have decided, pursuant to section 20 of the **Education Act 2004**, that:

HALL PRIMARY SCHOOL will close at the end of 2006.

Background

1. On 6 June 2006 I released a proposal titled "*Towards 2020: Renewing our Schools*" (the Proposal).
2. The purpose of the Proposal was to reinvigorate the government school system so that it would remain the first choice for the majority of families. The principles underpinning the Proposal were those of choice, diversity and opportunity. The Proposal outlined the Government's plan for the future provision of public education in the Australian Capital Territory (the Territory). The Proposal provided for a different configuration for Territory schooling provision, involving the integration of preschools into primary schools, the closure of a number of schools and preschools, the amalgamation of others and new structures such as P-3 schools, 5-10 schools, 7-12 schools and collegiate arrangements.
3. The Proposal also included the biggest capital injection into schooling since self-government with \$90 million for capital upgrades, \$67 million for new schools and \$20 million for information technology (IT) upgrades.

The Statutory Requirements

4. The *Education Act 2004* (the Act) governs the provision of public education in the Territory. The general principles and objects of the Act are contained in Part 1.2 Section 7 as follows:

7 General principles of Act

- (1) Everyone involved in the administration of this Act, or in the education of children of school age in the ACT, is to apply the principle that every child has a right to receive a high-quality education.
- (2) Without limiting subsection (1), a high-quality education is based on the following principles:
 - (a) school education and home education provide a foundation for a democratic society;
 - (b) school education and home education should—
 - (i) aim to develop every child's potential and maximise educational achievements;

- (ii) promote children's enthusiasm for lifelong learning and optimism for the future; and
 - (iii) encourage parents to take part in the education of their children, and recognise their right to choose a suitable educational environment; and
 - (iv) promote respect for and tolerance of others; and
 - (v) recognise the social, religious, physical, intellectual and emotional needs of all students; and
 - (vi) aim over time to improve the learning outcomes of students so that the outcomes are free from disadvantage because of economic, social, cultural or other causes; and
 - (vii) encourage all children to complete their senior secondary education; and provide access to a broad education; and
 - (viii) recognise the needs of Indigenous students;
 - (c) innovation, diversity and opportunity within and among schools should be encouraged;
 - (d) effective quality assurance mechanisms should be applied to school education;
 - (e) government funding should be directed to children through their schools or school system;
 - (f) the partnership between the home, community and educational providers should be recognised;
 - (g) school communities should be given information about the operation of their schools.
- (3) Everyone involved in the administration of this Act, or in the education of children of school age in the ACT, is to apply the principle that school education—
- (a) recognises the individual needs of children with disabilities; and
 - (b) should make appropriate provision for those needs, unless it would impose unjustifiable hardship on the provider of the school education.
- (4) Corporal punishment is not allowed in ACT schools.

5. The establishment and operation of government schools is governed by Part 3.2 of the Act, in particular section 20 which provides as follows:

20 Establishing government schools etc

- (1) The Minister may establish government schools and preschools (*government schools*).
- (2) The Minister may decide the kinds of government schools to be established and the educational level or levels for the schools.
- (3) The Minister may establish school-related educational institutions and services (*school-related institutions*).
- (4) The Minister may name, and change the name of, a government school or school-related institution.
- (5) Before closing or amalgamating a government school, the Minister must—
 - (a) have regard to the educational, financial and social impact on students at the school, the students' families and the general school community; and
 - (b) ensure that school communities affected by the closure or amalgamation have been adequately consulted during a period of at least 6 months.
- (6) To ensure that school communities affected by closing or amalgamating a government school are adequately consulted, the Minister must, before a decision is made on the proposal—
 - (a) tell the school communities about the proposal; and
 - (b) listen to, and consider, their views.
- (7) The consultation must be done in a way that gives effect to the following principles:
 - (a) consultation should focus on access to, and the provision of, quality educational opportunities;
 - (b) consultation should be open and transparent;
 - (c) consultation should lead to sustainable decisions by involving effective community engagement;
 - (d) without limiting paragraph (c), consultation should ensure that—
 - (i) relevant information is provided in a timely and accessible way to enable maximum community participation in debate about the proposal; and

- (ii) opportunities are provided for feedback about the proposal, especially from families and other people with significant interest in the proposal;
- (e) consultation should include seeking the views of school boards that are likely to be affected by the proposal.

The Consultation Process

6. On 6 June 2006 I announced the establishment of a consultation process in accordance with the Act. The consultation process was developed and conducted in accordance with the ACT Government's Community Engagement Strategy. Attachment A – Consultation Strategy outlines the entire consultation process. I am satisfied that the consultation process gave effect to the principles outlined in s 20(7) of the Act.

Reasons for the Decision

7. I have decided to close or amalgamate a number of schools and preschools in the Territory. The Government will then make a large capital investment of \$90 million for school infrastructure upgrades and provide \$20 million for IT upgrades across all schools so that students now, and into the future, receive the best possible educational programs in contemporary facilities.
8. The fundamental principle that underpins the Government's proposal is to provide children and young people in the Territory with a vibrant, responsive and world-class public education system that is second to none, and that provides the very best chance for each student, no matter which government school they attend.
9. I have decided to close Hall PS as part of a restructure of the Gungahlin region because whilst it is important for all young people to have access to a nearby school which provides for their educational needs, small schools may limit the opportunities for students to access and participate in a rich curriculum in all key learning areas due to their small size and fewer teachers.
10. Based on a recent Australian study by Professor Brian Caldwell (2005)¹ the appropriate and effective size for a primary school is between 300–400 students. As Hall PS has only 128 enrolments (ACT Department of Education and Training February 2006 School Census) it may be unable to ensure the provision and breadth of curriculum offerings available to students attending one of the other P-6 schools in the Gungahlin region, such as Gold Creek PS or Amaroo PS.
11. Current figures (February 2006 School Census) suggest that the majority of parents of children living within the Priority Enrolment Area (PEA) for Hall PS are choosing to send their children outside of their PEA for their schooling. The proposed provision for Gungahlin will provide parents living in the region with the choice to access schools operating at the existing sites of Amaroo School, Ngunnawal PS, Palmerston District PS and Gold Creek School. The needs of students, staff and families have been considered

¹ Caldwell, B. (2005). Research on school size: An educational transformations briefing paper. *Educational Transformations*. Melbourne.
<<http://www.educationaltransformations.com.au/>>

to ensure that the learning environments in alternative schools are appropriate. Most programs currently offered at Hall PS are being offered at other schools in the region and other programs can be accommodated and incorporated into these schools.

12. Currently there is excess capacity within the Gungahlin region and of the students who live within the PEA for Hall PS and attend government schools, only 43% of students are enrolled at Hall PS. To provide a range of educational settings within the geographic area which will be financially sustainable in the future, Hall PS will be closed to align the region's capacity with demand. NSW students will continue to be welcomed into ACT schools, however, under the proposed provision they can be more effectively educated in larger schools in the Gungahlin region which will be able to offer a broad and diverse curriculum in contemporary facilities.
13. At present it costs higher than the ACT average to educate a child at Hall PS. With only 128 students enrolled at Hall PS (February 2006 School Census), and with enrolments not expected to increase (ACT Department of Education and Training Projected Enrolments 2006 to 2010), it is likely that the cost per student per year will remain higher than the ACT average. Closure of Hall PS is anticipated to result in a saving of \$1,933,000 between 2007-2010. (Derived from ACT Department of Education and Training 2004-2005 audited financial statements - Refer Attachment B.)
14. Transitional support of \$750 will be offered to each student affected by the closure of Hall PS, who enrolls in a government school.
15. Assurances have been given that the buildings and grounds will return to the Department of Territory and Municipal Services (TAMS) for administration, in accordance with usual practice, and the Hall Village community will be consulted in regard to future uses for the site.
16. As Hall PS is within a heritage listed precinct the Government is mindful of the need to minimise impacts on the buildings and the need to respond with integrated planning strategies. Cessation of the school operations will not impact on the heritage listing of the buildings and grounds.
17. In reaching this decision I have had regard to the general principles and objects of the Act, the criteria specified in section 20 of the Act and the views expressed by school communities by way of the consultation process as outlined above. An assessment of the pertinent issues, considered by me to be material to this decision, is included in the Findings On Material Questions Of Fact.

FACILITY – HALL PRIMARY SCHOOL

Findings on Material Questions of Fact

18. Hall Primary School is situated in the northern region of Canberra and falls within the Gungahlin Region for the purposes of the *Towards 2020* Proposal.
19. The educational model proposed for the Gungahlin region is the provision of P-10 schools at Gold Creek and Amaroo along with the building of the new P-10 school in Harrison commencing in 2008. Two P-6 schools will operate at Ngunnawal and Palmerston and a new senior secondary college will open in Gungahlin in 2010.
20. This model will ensure the provision of a network of innovative and contemporary educational facilities for the region which will be able to provide a high standard and range of educational opportunities for students. This is aimed at developing every child's potential and maximising their educational achievements by offering innovation, diversity and opportunity within and among the schools in the Gungahlin region.
21. The Government recognises that many parents in the Hall area are not choosing the option of public education within their PEA for their children. The proposed provision for the region of Gungahlin will provide greater choice and more diverse opportunities for parents to school their children within their PEA. This will also provide students' families the opportunity to strengthen their links with their local community thereby fostering the partnership between the home, the community and the educational providers.
22. A number of issues in relation to the educational, financial and social impacts of the proposal on students, students' families and the school community in relation to Hall PS were raised and I had regard to and considered these. The major issues and my findings in relation to those issues are detailed in the following sections.

1 Educational

Small school

23. The current enrolment at Hall PS is 128 students (February 2006 School Census). The projected 2010 enrolment for Hall PS is 110 students (Projected Enrolments 2006 to 2010).
24. Projections are based on recent demographic trends and are generally in line with population figures released by the Demography Unit, Chief Minister's Department. Population forecasts are subject to change but projections from each school are determined from: school census data; data from the Registrar of Births, Deaths and Marriages on the number of births by suburbs; recent levels of grade to grade retention rates; estimates of enrolments from any proposed new residential developments; and any known enrolment policies or other factors, such as capacity limitations, which influence enrolment levels.

25. The families of Hall raised the concern that closure of the school would represent a loss of the traditional public school model offered to date in the region. Some parents indicated that they preferred the small, rural school to alternative schools offered under the Proposal, such as Amaroo PS. Parents felt that the small school was better able to meet the educational needs of their children and some parents indicated that they were not concerned that Hall PS could not offer the wider range of curricular and non-curricular activities offered in a larger school because these could be accessed out of school hours.
26. Whilst it is important for all young people to have access to a nearby school which provides for their educational needs, small schools may limit the opportunities for students to access and participate in a rich curriculum in all key learning areas due to their small size and fewer teachers. The small staff size also places higher demands on teaching staff.
27. **I find that based on a recent Australian study by Professor Brian Caldwell (2005), the appropriate and effective size for a primary school is between 300–400 students. As Hall PS has only 128 enrolments it may be unable to ensure the provision and breadth of curriculum offerings available to students attending one of the other schools in the Gungahlin region, such as Gold Creek School or Amaroo School.**

Parental choice

28. I recognise that many parents in the Hall area are not choosing the option of public education within their PEA for their children. Of the students who live within the PEA for Hall PS and who attend government schools, only 43% are enrolled at Hall PS. Parents are choosing to send their children outside their PEA for their schooling and the majority, (91%), of students attending Hall PS come from outside the PEA, mainly New South Wales (February 2006 School Census).
29. The educational provision proposed in *Towards 2020* focuses on providing families with a range of options to consider when making decisions as to where to enrol their children. This is also aimed at ensuring that government schools, many of which were developed in the 1970s, and in the case of Hall PS in 1911, will be able to meet the educational needs of students through to 2020.
30. **I find that current figures from the February 2006 School Census indicate that the majority of parents of children living within the PEA for Hall PS are not choosing schools within their area. The proposed provision for Gungahlin will provide parents living in the region the choice to access schools operating at the existing sites of Amaroo School, Ngunnawal PS, Palmerston District PS and Gold Creek School.**

Educational programs

31. Parents have expressed satisfaction with the curricular and extra-curricular programs on offer at Hall PS. There is support for the literacy program and the engagement of older students to assist with co-operative reading. The numeracy program is based on the 'Count Me In Too' system. Some parents have argued that the small rural school setting is relevant to educational outcomes, which resulted from educational programs run in conjunction with outside agencies such as Landcare, Greening Australia and Water

Watch. Hall PS implements a student well being model called 'Standing Tall at Hall' which encourages and teaches social skills, protective behaviours and anti-bullying strategies. The Before and After School Care programs which operate at the school are highly valued by parents.

32. I find that the needs of students, staff and families have been considered to ensure that the learning environments in alternative schools are appropriate. Most programs currently offered at Hall PS are being offered at other schools in the region and other programs can be accommodated and incorporated into these schools. ACT government schools report against the National Safe Schools Framework in relation to these issues. The pastoral care focus, in areas such as anti-bullying and protective behaviour, is replicated in all schools across the ACT. There are currently no programs offered at Hall PS that cannot be accommodated in other schools in the region.

Educational outcomes

33. Currently the ACT Assessment Program (ACTAP) is one of the forms of assessment undertaken by students in areas of literacy and numeracy. These results are reported to parents to inform them of their child's progress. ACTAP results are used to assist schools in developing teaching and learning programs to address the needs of students.
34. Parents claim that Hall PS has such good educational outcomes that it should remain open. They believe that this is because the small setting enables greater individual attention for their children.
35. I find that the 2002-2006 ACTAP results show that average student progress in reading, writing and numeracy from year 3 to 5 at Hall PS was not significantly different to the system average progress for each student group (2002-2004, 2003-2005, 2004-2006), except for average student progress in writing for the 2002-2004 student group which was significantly below system average progress. The reliability of data for the 2003-2005 student group is significantly affected by the small numbers of students who were assessed at the school in both 2003 and 2005.

2 Financial

Current enrolments from New South Wales

36. Of the students enrolled at Hall PS, the majority (91%) are not from the PEA. The majority of out of area students at Hall PS come from NSW. For residents of Hall Village and district, the political boundary between the ACT and NSW is nothing more than an administrative border and NSW residents who access Hall PS consider themselves to be residents of the Hall Village.
37. I find that NSW students will continue to be welcomed into ACT schools, however, under the proposed provision they can be more effectively educated in larger schools in the Gungahlin region, which will be able to offer a broad and diverse

curriculum in contemporary facilities. Currently the ACT Department of Treasury estimates the compensation for each NSW student attending an ACT government primary school to be \$6,800 per student per year. The Commonwealth Grants Commission (CGC) has independently verified this figure. The ACT Department of Treasury considers this figure falls well short of the average per annum cost of educating a student in a government school, which is \$9,570.

Costs of operating the school

38. The total cost to the Territory of operating Hall PS in 2004-05 was \$1,290,000. This figure is based on the direct and indirect costs associated with running the school, such as salaries and superannuation, school based management funds, school equity funds and student support funds, as well as school support services which are incurred and controlled centrally but relate directly to the school's operation. The figures for Hall PS are set out in Attachment B – Financial Data.
39. Currently the average cost of educating a child at Hall PS is \$10,937 per student per year as against the ACT average of \$9,570 per student per year in a primary school. This figure is based on the total expenses divided by the number of students enrolled at the school.
40. I find that with only 128 students enrolled at Hall PS (February 2006 School Census), and with enrolment numbers not expected to increase (Projected Enrolments 2006 to 2010), it is likely that the cost per student per year will remain higher than the ACT average cost per student. Further, the majority of students at the school are from NSW and the compensation received through the CGC equalisation process for these students falls well short of the ACT average cost per student. Closure of Hall PS is anticipated to result in a saving of \$1,933,000 between 2007-2010.

Capacity

41. Hall Primary School has a capacity of 175 students and currently has an enrolment of 128 (February 2006 School Census). Only 73% of the capacity of Hall PS is being utilised. School capacity figures reflect the designated teaching areas in the school and are calculated taking into account an extensive range of design factors and specific teaching needs including rooms available for specialist requirements and special class needs. Principals may request a review of capacity figures at anytime and these are carried out regularly. The most recent review of capacity for Hall PS, completed on 9 November 2006, confirmed the capacity at 175 students.
42. I find that Hall PS is currently under utilised and that there is excess capacity within the Gungahlin region. Of the students who live within the PEA for Hall PS and who attend government schools, only 43% of students are actually enrolled at Hall PS. To provide a range of educational settings within the geographic area which will be financially sustainable in the future, Hall PS will be closed to align the region's capacity with demand.

Cost of upgrading current buildings

43. Hall PS is located in a Heritage listed building constructed in 1920. The grounds and all buildings, including the museum, are listed in the ACT Heritage Register as part of the heritage listing of the Hall Village precinct. Due to the heritage listing of the school buildings it is not possible to alter the façade of the building or to impact on the historical significance of the site.
44. **I find that the current cost of upgrading Hall PS to the required standard for all other ACT schools is \$145,000 but such upgrading would not be able to effectively alter the capacity of the school to take more students and this expense may not be justified given that the majority of parents who live in the Hall PEA are choosing not to enrol their children at Hall PS.**

Cost to families

45. Parents have raised the issue of the increased costs associated with sending their children to a school not in their suburb. These costs were identified as relating to transport, such as increased fuel costs of driving children to school, or the cost of catching a bus to school instead of them walking.
46. **I acknowledge that this may affect those families who live in Hall Village and who currently enrol their children at Hall PS, however, based on the current figures (February 2006 School Census) the majority of students attending Hall PS are from outside the PEA and their parents would already be driving them to school or they would be catching public transport.**
47. **Transitional support of \$750 will be offered to each student affected by the closure of Hall PS, who enrolls in a government school.**

3 Social Impacts

Loss of neighbourhood school

48. Parents and local business owners have suggested the loss of the neighbourhood school will have a negative impact on the school community and the Hall Village community generally. Hall PS is considered to be essential to the economic and social wellbeing of the wider community. It was argued that the closure of Hall PS could affect house prices in the area and that it would also have an adverse effect on local businesses as parents would no longer be dropping off or picking up children at school and then doing business in the village.
49. **I met with the Progress Association and local business owners of the Hall Village to discuss these issues. I find that the village of Hall has the potential to promote its unique heritage status regardless of the cessation of school operations in the village.**

School as a community asset

50. The school community and the community generally consider the school to be a community asset and resource that will no longer be available for use by the community as a whole. The community is concerned that there is uncertainty as to what it may be used for in the future.
- 51. I find that the buildings and grounds will return to the Department of Territory and Municipal Services (TAMS) for management, in accordance with usual practice, and the Hall Village community will be consulted in regard to future uses for the site.**

Historical aspect of school

52. The school community and the community generally expressed concern over the possible loss of the heritage status and historical significance of the school buildings.
53. The original Hall building, which still remains, was built in 1911. It is now used as an education museum. The significance of the buildings and grounds was acknowledged when they were identified as a 'place of specific value' in the ACT Heritage Register listing for the Hall Village precinct and by the National Trust of Australia (ACT) classification for Hall Village.
- 54. I find that because Hall PS is within a heritage listed precinct, the Government is mindful of the need to minimise impacts on the buildings and the need to respond with integrated planning strategies. Cessation of school operations will not impact on the heritage listing of the buildings and grounds.**

Health and safety issues

55. Members of the community claimed that closure of Hall PS would deprive children who live in the village of the ability to walk to school and it also raises safety concerns for younger children who may now have to travel by bus to a larger school.
- 56. I find based on the current figures from the February 2006 School Census that the majority of students attending Hall PS are from outside the PEA and therefore are not walking to school. The majority of parents would already be driving their children to school or they would be catching public transport.**

4 Further Issues Considered

57. I have considered the issues raised in relation to Hall PS in the submissions received from:

Bushlink Pty Ltd (Rosemary McFarlane and Iain Pick) – Hall PS, S9
Hall Primary School Parents & Citizens Association, Hall Primary School
Board and Hall Preschool Parents Association – Hall PS, S4

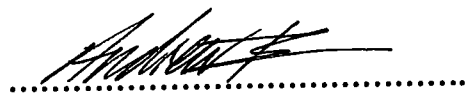
Village of Hall and District Progress Association – Hall PS, S7

Garrie Greenwood – Hall PS, S1
Penny Haisman – Hall PS, S11
Hall/Yallop family – Hall PS, S10
Vicki Harris – Hall PS, S5
Glenn Johnstone – Hall PS, S12
Anita Kilby – Hall PS, S6
Jill and Peter Jolly – Hall PS, S13
Jennifer Lewis – Hall PS, S8
L & J Morris – Hall PS, S2
Rosalie Richards – Hall PS, S3 (not published on website)
Russell and Judy Schneider – Hall PS, S14
David and Barbara Vernon – Hall PS, S15
Jeanette Vernon – Hall PS, S16

Hall PS, S1 etc. refers to the folio number of the submission in the Department's records.

58. I or my Department have responded to 78 pieces of written correspondence relating to Hall PS, recorded in Attachment C – Correspondence Schedule. (Copies of these documents are held in the Department). I have attended two meetings that dealt with issues related to Hall PS. A further 14 meetings were held with Departmental representatives. (Records of meetings are held in the Department.)
59. In addition to the issues and impacts referred to above, I have also had regard to and considered the matters set out in Attachment C. The issues described in part 1 of Schedule C relate to Hall PS specifically. The issues described in part 2 of Schedule C are matters related to the Proposal generally and are not specific to Hall PS. The Schedule includes telephone calls (P), Departmental records and correspondence (D), school meetings (SM), Ministerial meetings (M), written correspondence and emails (C) and submissions (S). (All records listed are held in the Department.)

Signed:



Andrew Barr, MLA
Minister for Education and Training

CONSULTATION STRATEGY Attachment A

The consultation process

The ACT community consistently demonstrates the value it places on public education and its desire to have input into decision-making on issues that affect the education of children and young people. The Government also has statutory obligations under Section 20(5) of the *Education Act 2004* that require that the Minister for Education and Training engage in a consultation period of at least six months before closing or amalgamating a government school.

Accordingly, at the time of the announcement, the Government advised that a comprehensive community consultation process would be implemented between 6 June and 6 December 2006, in accordance with the *ACT Government Community Engagement Service Charter*¹ and *Community Engagement Manual*².

On 6 June 2006, briefings were provided for government school principals, representatives from the Australian Education Union, the ACT Council of Parents and Citizens Associations, the Community and Public Sector Union, the Canberra Preschool Society and the non-government education sector. In the days following the announcement, School Board Chairs were invited to consult with the principal and the region's Schools Director about the proposal.

Meetings with major stakeholder groups continued throughout the consultation period. A *Towards 2020* project team was established within the Department of Education and Training to manage the consultation process.

Consultation publications

Eight four-page publications entitled *Towards 2020: Renewing Our Schools* were distributed to school communities, key stakeholder groups and members of the broader community. These set out the current educational provision and the Government's proposal for each of the educational regions of Canberra: Gunghalin, Belconnen North West, Belconnen South East, North Canberra, South Canberra, Weston Creek, Woden and Tuggeranong.

These documents contained relevant data relating to government schools and preschools. School information covered current enrolment numbers, projected enrolments at 2010 (based on current sites), the enrolment capacity of the school, the percentage of the school utilised, the percentage of students enrolled at each school coming from out of

¹ ACT Department of Disability, Housing and Community Services (2005), *ACT Government Community Engagement Service Charter*, Canberra

² ACT Department of Disability, Housing and Community Services (2005), *Your Guide to Engaging with the Community*, Canberra

area and the percentage of government school students living in the school's priority enrolment area (PEA) who attended the school.

In addition, information was provided on the proposed regional school provision, including projected student enrolments at 2010 for each school under the proposed arrangements. Also included were details of the date and venue of community forums scheduled for each region, notification of the *Towards 2020* website address and telephone inquiry hotline number and information about how the community could seek clarification on the proposal and provide feedback.

Copies of *Towards 2020* publications were made available at ACT Government Shopfronts and the Gungahlin Library. A leaflet was also distributed to all households in the ACT providing the details of community forums and contact details. An open letter from the Minister to parents and carers in affected schools was included in school newsletters. Letters were also sent to families of students with special needs to invite them to meet with school and special education staff to discuss the particular transitional support needs of their children should the proposal proceed.

Consultation website

The Department of Education and Training's *Towards 2020: Renewing Our Schools* website was activated immediately following the announcement. It contained the same information as the printed publications, as well as a page for each school which gave parents and carers and community members access to information concerning the possible effects on their school community.

Papers on the education models proposed were available for reference and Frequently Asked Questions were updated regularly in response to common questions. Additional statistical and financial information was also posted on the site. The website detailed the avenues available to the community to provide feedback and seek further information.

Community consultation forums

Ten community forums were offered to the public. An evening public forum was held in each of the eight regions during June and July 2006. The Minister for Education and Training outlined the educational, demographic, social and financial criteria drawn upon in developing the proposal and, along with Departmental representatives, answered questions from the floor.

In October, Departmental officers and Ministerial staff attended a community forum for parents and carers of students with special needs. The Minister also attended a *Youth InterACT* forum which was also held to discuss the *Towards 2020* proposal with school age young people and representatives of the Ministerial Youth Council.

Between August and October 2006 a series of six education seminars was held, focusing on the new curriculum framework, early years of schooling, emerging technologies and special education. Over 600 people attended these seminars.

In addition, the Chief Executive and/or Departmental officers attended meetings of the Canberra Preschool Society to discuss preschool issues and of the Indigenous Education Consultative Body to discuss issues for Indigenous students and their families.

Consultation correspondence

The ACT Chief Minister, the Minister for Education and Training and the Department of Education and Training provided over 1650 responses to correspondence received regarding the *Towards 2020* proposal during the consultation period. This included responses to emails, letters and submissions.

Consultation submissions

Over 350 submissions were received on the proposal. Submissions were called for by Friday 3 November 2006 but were accepted until the end of the consultation period on 6 December 2006.

Some communities developed a collaborative approach to preparing submissions. This involved school governance groups, school staff, parents and carers and community members. Consolidated submissions of this kind enabled communities to put forward their views in a coherent and cogent way.

Submissions for which permission was given for publication will be available on the *Towards 2020* website³ from 13 December 2006.

Consultation meetings

Over 700 meetings were held by the Minister, Ministerial staff and Departmental officers during the six-month consultation period. These included group and individual meetings with parents and carers, school communities, members of school boards, Parents and Citizens Councils, Preschool Parents Associations, community members, business groups and other stakeholders.

The Minister visited, or met with representatives of every school proposed for closure and in a number of cases followed up with further meetings with school communities. He met with representatives of school boards, parents' associations, the ACT Government School Education Council and community groups. These meetings provided the opportunity for the Minister to hear the views of the community and to consider issues over the length of the consultation period.

³ *Towards 2020*, <http://www.det.act.gov.au/2020/index.htm>

FINANCIAL DATA

Attachment B

School: Hall Primary School – Proposed for closure 2006
Financial (all figures in this section relate to 2004-05 unless otherwise indicated)
Average cost to educate a student: \$10,937 (ACT average \$9,570 per student in a primary school)
Operational Costs
Direct employee expenses: \$0.860m
Direct SBM payments: \$0.129m
Depreciation: \$0.047m
Other in school expenses: \$0.051m
Educational & corporate support costs: \$0.203m
Total cost to operate the school: \$1.290m

Savings from Closure			
	SBM	Salary	Total
	\$m	\$m	\$m
2006-07	0.056	0.220	0.276
2007-08	0.112	0.435	0.547
2008-09	0.112	0.436	0.548
2009-10	0.115	0.447	0.562
Total	0.395	1.538	1.933

Notes:

1. Employee expenses include salary and superannuation costs for all teachers and administrative staff at the school during the year. This includes centrally funded relief.
2. School Based Management (SBM) payments are made to schools for site running costs such as cleaning, minor maintenance and utilities. 2004-05 amounts include 2 quarterly payments in 2004 and 2 in 2005.
3. Other in school expenses include Australian Government specific purpose funding and other general expenses incurred in providing educational programs in schools.
4. Depreciation includes depreciation on buildings and plant and equipment.
5. Educational and corporate support costs are the sum of costs which are centrally funded such as curriculum, and other corporate costs such as finance and human resources.

Source: ACT Department of Education and Training, derived from 2004-2005 audited financial statements.

CORRESPONDENCE SCHEDULE

Attachment C

Part 1 Hall Primary School

Concern / Issue raised	Correspondence schedule numbers
Educational issues raised	
General:	
Current enrolments make school viable	C1, C29
Loss of specific curricula Unique rural opportunities, environmental focus	C62, S3, S4
Loss of extra curricula programs	C62, S4, S16
School achieving good educational outcomes - no need for change	C1, C12, C28, C31, C34, C44, C45, C47, C53, C54, C51, C52, C57, C73, S2, S4, S5, S13, S15
School achieving better outcomes than school(s) remaining open	S1, S6
Loss of good facilities Museum	C18, C62, S1, S2 C55, S2
Loss of rural education programs	C4, C51, C53, C54, C67, S2, S4, S6
Questions about data	
Data claimed to be generally incorrect	C3, C24
Capacity figures claimed to be incorrect	C3
Projected enrolments: demographic data claimed to be flawed	S4
Projected enrolments: have not taken account of school 'turning around' and attracting future enrolments	C5, C13,
Other	C13 (out of area enrolments steady for last 15 years)
General enrolment data questions	D12
New families have come to Hall with children already established at other schools – explains lack of local enrolment	C75
Parental choice	
Loss of choice across the ACT	S1, S3, S6, S8, S16

Fewer schools means less choice	S1, S8
Family moved to be in the area	C29, C78
Fewer schools means less access to NSW parents	C6, C15, C24
Small schools will no longer be available choice	C78, S6, S8
Parents in Gungahlin & Belconnen NW choosing Hall PS	C53, C54, S1, S16
Loss of choice within region	C49, C51, C74
Concerns about models being proposed	D6
Loss of choice locally	S8
Loss of neighbourhood school	C15, C22, C25, C36, C78, S4, S6, S8, S16
Loss of a particular model of schooling (rural schooling)	C51, S4, S7, S10, S11, S16
PEAS	
PEAS – timeline for new areas?	C9, D4
NSW residents	S4, S6 (Cross Border Agreement should support extended PEA for Hall)
Sibling rights issues	C36
Enrolment rights for NSW Hall Primary School students	D8
Value of small schools	
Individual attention	C18, C25, C44, C39, C40, C42, C47, C67, C74, S3
Caring & friendly	C3, C13, C18, C46, C47, C67, C74, C78, S1, S6, S13, S15, S16
Research evidence suggests improved outcomes for 'at risk' and special needs students	S3, S4, S8
Curriculum provision meets parent expectations	C1, C18, C62, S1, S4, S6, S8, S11, S15, S16
Primary schools should focus on core curriculum; don't need big school for this	S4, S8
Promotes sense of self and community	C18 ('retain its unique character'), C67, S3
"Big is not always better"	C7, C18, C30, C38, C40, C44, C45, C57, S5
Question: where is research about school size?	C42, C48

Loss of older student mentoring in early childhood schools	S6
Loss of excellent relationships with staff	C53, C54
Models	
Discussions about P-3 school at Hall, and affect on the curriculum	D11
Staffing Matters	
Status of staffing	D6, D7
<i>Financial issues raised</i>	
Questions of costs data	
DET expected savings figures claimed to be inaccurate or overstated	C27, C34, C37, C43, C44
Schools proposed for closure	Hall PS similar to other schools staying open: C2, C14, C21, C20, C21, C22, C24, C34, C36, C44
DET school costs figures claimed to be inaccurate	C3, C24
ACT / Australian Government funding agreements & impact on proposal?	C1, C18, C26, C44
ACT / NSW Government funding agreements & impact on proposal?	C13, C18, C26, C31, C34, C44, C47, C48, C49 (note: 'Hall PS parents work and/or shop in Canberra) S13, S15, S16
NSW Govt should pay more	S2
Proposal does not take a cost- benefit approach (including costs to families and community	C26, C27, C44, C47, C49, S4, S16
Facilities upgrades could be relatively low cost	S4
Acknowledgement of high cost per student	C13, C18, C44, C13
"Education should not be ruled by the bottom line"	C21, C25, C27
Disbursement of school funds if closes?	D12
Costs to families	
Transport	C57
Advice on Transition funding (eg when known; how much)	D1

General impact of transition	D1, C28, C36, C38
Costs to communities	
Effects on business eg loss of local shops	M1, C14, C18, C41, C45, , C53, C54, C57, C58, C62, S1, S5, S7
Proposal claimed to be about land sales (including questions of how land will be used)	C4, C18, C21, C26, C44, C75
Proposal claimed to be about saving money	C75
Social issues raised	
Loss of neighbourhood school (community social networks)	C3, C4, C14, C15, C16, C17, C18, C19, C23, C25, C28, C30, C34, C38, C44, , C53, C54, C74, S1, S3, S4, S6, S13
Students will lose friends	C18, C44, S1
Students will be seen as outsiders in receiving schools	S9
Loss of school as 'heart of community'	C14, C59 ('social costs'), S3 ('source of pride'), S4 ('essential to economic and social well-being') S6, S7 ('role of schools in small communities'), C76, D3, S11, S14, S15
Loss of before and after school care (& holiday programs)	C23, C58, C74, S1
Loss of heritage values and students' sense of history. Canberra should value the historical links Hall provides	D3, C15, C17, C20, C25, C29, C30, C47, C58, C62, C66, C71, C77, C78, S1, S3, S5, S6, S7, S11
Heritage Day Centenary celebrations planned for 2011	D2, D6 S1 S1
Loss of cross-border interactions	S9
School contributes to community events	
Transition issues	D4, D10, D12
Opportunities for before and after school care to be provided on the site	D11
Transport	
Transport difficulties due to changes (eg no car/one car)	C25, C57, S4
Environmental impact of families needing to use transport	C29, C57, C63, C64, C65, S4
Length of bus travelling time	C39, C40, C42, C46, C57, S4, S9
Timing of notice on new bus routes?	C57,
Student health concerns as no longer walking to school	C29, S4

Safety concerns (eg parking, road crossings, bicycle paths, traffic lights)	C57, S4
Inadequacy of school bus services	C57, S4
Need to revise bus policy eg rural to any ACT school	S4
Concerns about young children travelling	S9
Special needs bus arrangements	D9
Agrees Government needs to review and renew schooling provision	S6
Timeframe too short for 2007 implementation	C5, C7, C27, C47, C48, C56, S6, S8
Need to extend the consultation period	C10, C11, C18, C27, C37, C44, C78
Government should have consulted before developing proposal	C2, C7, C20, C27, C28, C36
Claimed that individuals or groups did not have their views heard	C1
Claimed that consultation not genuine, decisions already made	S8
Criteria for proposed closure of particular schools not explicit	C47, S6, D4, S12, S13, S14, S16
DET using data not available to public to inform recommendations	C8, C31, C34, C35, C44, S6
Claimed that questions not answered	S7
"Fix Government school problems first; don't close schools!"	C68

Summary of proposal	Schedule number
Options to achieve savings: More collaboration with other small schools	S6
Exploit heritage values for all ACT students Museum as a resource for ACT schools	S4, S6
Strengthen early childhood provision	S4
Develop agri-environmental curricula, could be used by other schools	S4

Part 2 Correspondence - General

Concern / Issue raised	Correspondence schedule numbers
<i>Educational issues raised</i>	
Schools proposed for closure	
<i>General:</i>	
Current enrolments make school viable	C17
Loss of specific curricula	C239
Loss of extra curricula programs	C238, S15 (requests protection) P34,
Schools achieving good educational outcomes - no need for change	C170
Loss of good facilities	C9, C17, C43, C51, S20
Protection, storage or new location for school assets, memorabilia etc	C9, C43, C231
Concerns about students coping with change and moving to new schools	C118
Questions of educational, social, and financial impact on students	C128, C134
General opposition	C19, C35, C37, C43, C58, C79, C85, C92, C93, C102, C103, C179, C180, C228, C323, C250, C225, C266, S33
General support	C28, C29, C39, C40, C54, C56, C63, C67, C90, C101, C112, C116, C135, C136, C141, C171/176, C172, C173/174, C175, 198, C208, S27
Concerns about the rights of Yass Valley students	C151
Concerns standard of education is decreasing	C206
Suggested ways to improve education in the ACT	C214
Closures should result in better educational outcomes for students	S21
General lack of educational rationale behind proposal	S26, C247 (requests evidence of educational advantages of new models)
Claimed that there is a lack of resources to implement set schedule	S26
Negative impact of closures to outcomes of students	S30

Educational quality is not related to number of empty places at a school	S37
Questions about data	
Capacity: are demountables counted?	C51, C115, C135, C157, P3
Capacity: modern education requires additional space	S8, S34
Projected enrolments: claimed that demographic data flawed	C33, C72, C75, C77, C100, C119, C167, C242, C243, S30, S33
Claimed that current enrolment figures incorrect	C91, S3
More detail of criteria required	C4, C21, C49, C57, C71, C74, C81, C109, C121
Claimed that capacity figures in accurate	C25, C52, C75, C77, C87, C91, C100, C132, C135, C166, C170, C243, S24, S37, S44, D3
quest data about public attending local schools	C147
Why are some schools with a lower percentage capacity rate staying open?	C157
Enrolments are already decreasing because of proposed closures	C167, C230, C264, C265, S4,
Equity concerns	
Claimed that inequitable impact on indigenous students and families	C43, C240, C255, S30,
Claimed that inequitable impact on low SES students and families	S18, S24, S30, S34, S42
Government must protect the rights of all students	S21
Dealing with equity in 2020	P13
Parental choice	
Claimed that will result in loss of choice across the ACT	C26, C131, C170, S24, S34
Range of models not available in all regions	S34, S36, S44
Larger schools offer more choice	S1, S43
Small schools will no longer be available	S20, S30, S34
Loss of choice within region	S34
Range of models not available in region	C130
Loss of choice locally	C121, S6

Parents don't want their children leaving permanent buildings to go into demountables	C146, S34
PEAS	
PEA system operates against choice (eg some specialist programs only available in one region)	
Enforce student attendance within PEA only	S34
PEAS – timeline for new areas	P31
Lack of information about PEAS	C109
Choice of school - rights	C3, C76, C223, S36
Negative effect on hopeful out of area enrolments	C6, C76, S34
Should address why people don't go to school	C6
Government deciding what schools will close, then thinking of PEAS – should be the other way around	C202
How are the NSW students being considered?	C236
Students not attending local schools because of lack of educational value	S3
Review of PEAS is complicating matters	S34
Out of area priority	P7
Request for info about PEAS	P23
Value of small schools	
Individual attention	C26, C37, C44, C82, C115, C209
Caring & friendly	C197, C238, C239
Suggestions about improved outcomes at small schools	C221
Cost effectiveness	C62
Teach children valuable life skills	C102
General value	C140, C160, C165, S30, S34, D3
Behaviour problems are better dealt with	C238, S3
Small schools assists sense of community	S8

Inconsistent attitude towards small schools (still supporting them in the private sector)	S31
Models	
General	
Too many models	S4
Models will support 'seamless pathways'	S7
Some models will mean too many transition points through schooling	C205
Some students will need to move multiple times because of 2007 closure	C15
Support for models	C15
Requests for evidence of advantages of and disadvantages of models and larger schools	C119, C120, S34
Concerned about disadvantages of larger schools	C154, C160, C221, C237, C264, S17, S24 (provides examples), S29, S30, S39, S39, S42
Criteria for deciding on particular models of schooling	C124, C138
Public needs to be made more aware of educational advantages of new models	C141
No consistency within regions	C146, S7
Expected educational outcomes for new models	C146, S30 (no evidence to suggest improved educational results) S44 (similar outcomes as current model)
Cost of adapting existing schools to cater for the new grades the school will have	C218
Will current programs be lost?	C224
Concerns about lack of choice of particular models	C224, S34 (retain use of larger and smaller schools)
Capacity issues will force students into particular schools	S36
Provide counselling to improve behaviour	S41
Research that supports putting year 6 into high schools	P10
Early years	
Specialist early childhood schools should be P-2, not P-3	C204, S7, S20, S43
Importance of early learning, thus importance of trained staff	S20
Middle Schooling	

Positive response to middle schooling	C238
Model unproved	C48, C218
Loss of Y6 leadership in primary schools	S36, C266
More information about what middle schooling involves	C109
Will students be forced to do year 6 at HS?	C18, C266
Doesn't believe students will attend Stromlo in year 6	C238
Interested in middle schooling, but believes it won't suit all students	S36
7-12 schools	
Loss of successful college model	S11
Less curriculum choice than colleges	S11
Loss of young adult environment	S11
Where did the demand come from?	C144
Existing 11-12 model would be weakened by integrating other years	C149, C167, S11, S29, S34 (support for 11-12), C244, C262 (requests evidence to support 7-12)
ACT schools will miss out on grants if all other states have 11-12	S23
Students with particular needs	
Impact on:	
Students with Autism Spectrum Disorder	C150
Students with disabilities	C210
Concerns about:	
Appropriate facilities and resources	C1, S43, S46
Students coping with change	C235, C245, S36, S42
Unit cohorts remaining together	C1
Continued provision of mainstreaming opportunities	C189, S46
The detrimental effect large schools will have on students with special needs	S34

Availability of schools in their area with special needs unit	C210, S46
Government "targeting" students with special needs	C232
The closing of schools with LSU	C235
Early childhood schools will mean additional transition for students with special needs	S46
Stress for families	S46
Need more time for planning and transition	C246, C259, D1
Heard rumours of special ed funding reduction	P9
Heard point system to change – harder for students to get into units	P9
aff matters	
Loss of staffing positions, including executive opportunities	C52, C161
Teacher stress	S9, S34
Bigger classes	C185
Timing of transfer outcomes	C230
Effect on school staff	C104
Concerns about future working conditions	C137
Request for funding to go towards teachers and assistants	S13 (not technology), S19
Concern that teachers not involved in the development of proposals	S13
Concern that professional development opportunities will be lost	S20
Concern that staff will not have early childhood training	S20
Government needs to address the lack of social recognition teachers have in the community	S21
Provide a career path for gifted teachers	S41
Provision for minimum number of teachers	S43
How many staff at schools will be affected	P2
Preschools	

Desirability of childcare and long day care programs associated with preschools	C13, C234, S6, S28
Criteria not clear	C108
Integration with PS needs to ensure appropriate structures take place	S6
Government doesn't have a commitment to early childhood education	S20
All viable preschools should remain open, even if their primary school closes	S120
All students should have the right to government preschool	S20
Preschool registration should be earlier	P8
Financial issues raised	
Questions of costs data	
Schools proposed for closure	C108, S6, S30
Claims that DET school costs figures inaccurate	S30, S37
Proposal does not take a cost-benefit approach (including costs to families and community)	C264, S26
Issues with cost analysis	C128, C129, C211, S3, S34, S44
Put more money into schools	C103
Don't close schools to make money for dragway	C132
Closure of preschools results in small savings	S7
Cost per student doesn't reflect special needs provision	S9
School configuration based on economic factors	S19
Requests more money spent on upgrading existing schools	S24, S41
Waste of public resources	S31, P12 (who is paying for ads?)
Costs to families	
Transport	C239, C256, C258, S13, S14, S18, S20, S30
Costs of changing schools eg uniforms	C148, P4 (heard "rumour" about support)
Advice on Transition funding (eg when known; how much)	C115, C126, C150, S18, P10

Ask parents to pay more taxes to save schools	C73
Increased costs may result in more truancy amongst disadvantaged students	S18
Costs to communities	
Loss of community resources eg sporting fields	C119, C168, C206, S37, S48
Loss of school impact on house prices	S14, S30, S44, P7
Effects on business re loss of local shops	C153, C213, C264, S30, S48
Proposal really about land sales	C33, C47
How will vacated land be used? (may provide suggestion)	C207, C234, C248 (request for childcare use), C249, C253, C257, S2 (use for cheap accommodation for needy), S22, S30 (suggests ideas), S34, S44, P10 (vandalism concerns), P21, P32,
Employment effects	S30, P2 (contractors)
Questions about what is going to happen to P&C funds, excess uniforms, etc.	C260
Tenants	
Building used as a homeless shelter	C114
<i>Social issues raised</i>	
General	
Loss of neighbourhood school (community social works)	C5, C30, C86, C98, C147, C264, S16, S30, S44
Students will lose friends	C27, C86, C115
Loss of school as 'heart of community'	C9, C27, C30, C98, C100, C105, C130, S16
Stress for students with special needs	C7, C9, C270
Loss of parental involvement	S20
Community support for schools to remain open	C131, S16
School closures will effect community and parents generally	C166, S24
Stress for parents and community	C169, C212
Request for social impact assessment	C226

Schools in each suburb not necessary – community is broader	S1
Co-location of early childhood services in proposal	S5
Community contribution for fundraising	S20
Transition support requested	S30, S40, S43, P3
Transport	
Transport difficulties due to changes (eg no car/one car)	C148
Environmental impact of families needing to use transport	C262, S30
Student health concerns as no longer walking to school	C30, C43, C82, C239, C262, C264, S16, S20, S34,
Safety concerns (eg parking, road crossings, bicycle paths, traffic lights)	C43, C197, C238, S14, S16, S17, S24 (requests upgrades), S30
Inadequacy of school bus services	C109, C183
Wanting free bus transport	C30
What provision will be made to ensure travel arrangements will not be a burden	C151
Travel on public transport isn't safe	C151, S16
General transport issues with increased traffic	S9, S24
School bus scheme	P13
General issues raised	
Timeline too short for 2007 implementation	C5, C8, C42, C45, C80, C81, C89, C95, C97, C119, C125, C169, C197, C230, C238, C245, C259, C262, S6, S20, S29, S34, S37, S46
Government should have consulted before developing proposal	C45, C203, C262, C264, S13, S42, S48
Individuals or groups did not have their views heard	C12 (old tech process)
Decisions were already made (consultation not genuine)	C130, C143, C158, C225, C237, S8, S26, S29, S34, S37, S38
Criteria for proposed closure of particular schools not explicit	C3, C138, C216 (requests statement of reasons), C262, S13, S17, S30, S34
Unclear whether outcomes data (eg ACTAP) were used to inform proposal	C10, C70, C170
DET using data not available to public to inform recommendations	C193, C245, S9, S19, S42, S44
Requests for information	C2, C11, C16, C22, C32, C35, C38, C46, C49, C60, C61, C68, C69, C83, C94, C108, C110,

	C117, C121, C126, C127, C128, C129, C134, C155, C157, C159, C161, C182, C188, C191, C204, C211, C216, C219, C255, S34, P24
Against sale to private schools	C31, C33, C36, C115, C215
Lack of an experienced minister	C104
Need for objective report/study	C64, S48
Towards 2020 – anti live in Canberra campaign	C86, C185, S16, S37
Consultation period not long enough	C117, C125, C143, C170 (bad timing), C212, C262, S34, S42
Request evidence of consultation- believes there is a lack of consultation	C117, C146
Requests support with submissions	C139
Government needs to do more planning	C144, C200, C259
How government determines funding for non-government schools	C142, C176
Honesty with community required	C146, C207, C264, S31 (explain terminology) C57 (suggests FAQ's)
Requests sensitivity for dates and method of announcement of the final decision	C201, S38 (inconsiderate)
Losing people to non-government schools	C203, C261, S4, S34, S36, S37, D3
Requests information on who and how the submissions would be analysed	C217 (requests independent party) C219
Close schools sooner rather than later	S1
Concerns over language of proposal	S7
Questions priority of government	S17
Offers suggestions to reverse decline in government school enrolments	S23
Suggested ways to improve demographics of areas with closing schools	S23
Question relationship between Towards 2020 and territory plan	S26
Should have undertaken risk analysis	C 240, C255, S34
Requests government to conduct surveys to gain information from parents, students, and staff	S40
Suggests DET discuss school closures with other organisations	S40
Family moving to ACT- needs to know what's happening	P5

Issues with savings as costs	D1
West Belconnen only open P-6 in 2009 – Request for P-10 “as promised”	P19
“Schools Location Bill”	C263
Request for compensation for schools that were proposed to close but didn’t	C265

Summary of proposal	Schedule number
Review assistance schemes to minimise effects of school closures on disadvantaged and homeless students	S18
Delay decision till 08 to allow full public enquiry and time to manage change	S18
Leave Narrabundah, Charnwood & Southern Cross as P-6 schools	S18
Establish a revitalised school on the Holder site (instead of Duffy)	S18
Intergenerational facility on site possibly including ‘independent government school’	S22
Use excess space more productively to support community benefit	S30
Strengthen public education through development of community schools	S30
Use submissions as starting point for extended process to support more informed decisions: no closure of amalgamations until 2007	S34
One-stop-shop sites for families incorporating infant and day care, preschool to Year 5 and before and after school care.	S34
A strategy that includes smaller and larger schools.	S34
Development of guidelines for future proposed closures and amalgamations.	S34
Requires a revisit of the strategy in 2020 as a matter of urgency	S44
Suggests that different aspects of education system be considered within a hierarchical framework – at a local, subdistrict, district or metropolitan level	S44

The correspondence schedule numbers refer to correspondence and briefings for Ministerial meetings on the Proposal, held in the ACT Department of Education and Training. Correspondence is coded as follows:

- P Telephone calls
- D Departmental correspondence
- M Ministerial meetings
- C Written correspondence and emails
- S Submissions

P1 etc. refers to the folio number of the record of the telephone call held in the Department’s records.
D1 etc. refers to the folio number of Departmental records and correspondence.

SM1 etc. refers to the folio number of records for school meetings

M1 etc. refers to the folio number of records for Ministerial meetings.

C1 etc. refers to the folio number of written correspondence or emails held in the Department's records.

S1 etc refers to the folio number of the submission held in the Department's records.