



GOVERNMENT OF BERMUDA
Ministry of Education

PARISH PRIMARY SCHOOL CONSULTATION REPORT

JULY 2021



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EXPRESSION OF APPRECIATION AND THANKS

The Minister of Education, the Hon. Diallo V. Rabain, J.P., M.P., would like to acknowledge and recognize the contributions of every individual, group and organization that participated in the parish primary consultation process.

It is heartening that so many parents, staff members, alumni and other members of our community took the time to read the consultation materials, attend consultation meetings, and develop thoughtful, passionate and detailed consultation submissions.

Each and every question, comment, concern, issue and proposed alternative has been thoroughly considered within the analysis and decision-making process.

We hope that you the public will continue to engage in the process of Education Reform to ensure that all public school students benefit from high-quality education and great life-time opportunities.

INTRODUCTION

Background

As part of Education Reform, on December 18th, 2020, the Ministry of Education (“Ministry”) launched a consultation process that proposed to modernize and improve primary schools.

The Ministry invited critical stakeholder and community participation in the consultation on proposals for the introduction of parish primary schools, including primary schools recommended for closure. It also invited alternative proposals that would meet the objectives of improving the quality of education and student outcomes for all students.

Transparency in Decision-Making

The Minister of Education (“the Minister”) committed to transparency throughout the consultation and decision-making process regarding parish primary schools. Therefore, the Parish Primary Consultation Report was developed to provide:

- A detailed overview of the parish primary consultation process, and
- An analysis of the consultation submissions received during the consultation.

How the Parish Primary Consultation Report is Organized

The Parish Primary Consultation Report is organized in 4 parts:

Part I – Overview of the Consultation Process

Part II – Consultation Analysis Process

Part III – Analysis of Consultation Points

Part IV – Analysis of Alternative Proposals

Other Related Documents

The Parish Primary Consultation Report should be read along with other critical documents, that were also developed to ensure transparency, including the:

- The [Parish Primary School Decision Report](#) which shares the Minister’s decisions on proposal for parish primary schools, and the reasons for the decisions; and
- All of the [Parish Primary Consultation Submissions](#) received during the consultation.

These documents are extensive and lengthy because they reflect the considerable community involvement and participation in the consultation process.

These documents are available on the Ministry’s website at www.moed.bm, along with the [Parish Primary School Consultation Document](#) which sets out the proposals that were consulted upon.

PART I – OVERVIEW OF CONSULTATION PROCESS

Parish Primary Consultation Issues

Specifically, the Ministry consulted on:

- i. Whether or not to introduce parish primary schools, consisting of 1 primary school per parish, except for Pembroke Parish which would have 2 primary schools; and
- ii. Whether or not to adopt the proposal for each parish, noting the Devonshire Parish proposal included an exceptionalities signature school and an alternative signature school.

The following primary school sites were proposed as parish primary schools:

Parish	Primary School
St. George	East End Primary School
Hamilton	Francis Patton Primary School
Smith's	Harrington Sound Primary School
Devonshire	New Devonshire Primary School
Pembroke	Victor Scott Primary School
Pembroke	West Pembroke Primary School
Paget	Paget Primary School
Warwick	Purvis Primary School
Southampton	Dalton E. Tucker Primary School
Sandys	Somerset Primary School

The following primary schools were proposed for closure as public primary schools:

Parish	Primary School
St. George	St. George's Preparatory School
St. George	St. David's Primary School
Devonshire	Prospect Primary School
Devonshire	Elliot Primary School
Pembroke	Northlands Primary School
Paget	Gilbert Institute School
Southampton	Heron Bay School
Southampton	Port Royal School
Sandys	West End Primary School

The following primary school sites were proposed to serve as the alternative education signature school and the exceptionalities signature school:

Sites	Signature School
Elliot Primary	Alternative Education Signature School
Prospect Primary School	Exceptionalities Signature School

Stakeholder Engagement and Outreach

Education Reform is a major national initiative and it was critically important to have community outreach to share information and encourage stakeholders to give constructive feedback regarding the proposal for parish primary schools.

A communication strategy was implemented which included a targeted advertising campaign informing stakeholders of the consultation process and the many opportunities available for community engagement and feedback. The following persons and groups were invited to participate in the consultation process:

- Students
- Parents
- Principals, preschool administrators, other system leaders and staff members of the Bermuda Public School System
- Officers of the Bermuda Union of Teachers, the Bermuda Public Services Union and the Bermuda Industrial Union
- The St. George’s Board of Governors
- The Board of Education
- Alumni, and
- Other community members.

To this end, the Proposal for Parish Primary Schools Consultation Document was released in December 2020 which included a response form asking the public for their feedback by the deadline of March 12th, 2021.

Consultation Meetings

Public and parish consultation meetings were held virtually using the Zoom platform due to the COVID-19 pandemic. Each meeting was scheduled from 6:00 p.m. to 8:00 p.m., on average, 2 to 3 times per week from January 26th to March 8th, 2021.

At least 1 public meeting and 1 meeting per parish was livestreamed utilizing the Bermuda Government Facebook page and/or CITV and YouTube.

The Ministry also provided a telephone number to allow questions from persons watching at home on CITV who did not have internet access.

The meeting format consisted of a two-part PowerPoint presentation by the Commissioner of Education, with Education officials on hand to respond to questions. For the sake of online security, participants were asked to register to attend each meeting. They were able to send in questions in advance, as well as ask questions and make comments during the meetings. Stakeholders were also able to send questions and feedback to consultation@moed.bm.

Staff and Other Stakeholder Consultation and Engagement Meetings

The following meetings were held for close and internal stakeholders:

No.	Meeting	Date
1.	Board of Education Members Ministry and Department of Education Staff	Friday, January 22 nd , 2021
2.	Principals and Preschool Administrators	Friday, January 22 nd , 2021
3.	St. George's Preparatory School Board	Friday, January 22 nd , 2021
4.	Union Officers (Bermuda Union of Teachers, Bermuda Public Services Union and the Bermuda Industrial Union)	Monday, January 26 th , 2021

The following public and parish consultation and engagement meetings were held:

No.	Meeting	Date
1.	Public Meeting	Tuesday, January 26 th , 2021
2.	Public Meeting	Monday, February 1 st , 2021
3.	St. George's Parish Meeting	Tuesday, February 2 nd , 2021
4.	St. George's Parish Meeting	Thursday, February 4 th , 2021
5.	Devonshire Parish Meeting	Monday, February 8 th , 2021
6.	Devonshire Parish Meeting	Wednesday, February 10 th , 2021
7.	Pembroke Parish Meeting	Tuesday, February 16 th , 2021
8.	Pembroke Parish Meeting	Thursday, February 18 th , 2021
9.	Paget Parish Meeting	Monday, February 22 nd , 2021
10.	Southampton Parish Meeting	Tuesday, February 23 rd , 2021
11.	Paget Parish Meeting	Wednesday, February 24 th , 2021
12.	Southampton Parish Meeting	Thursday, February 25 th , 2021
13.	Public Meeting	Monday March 1 st , 2021
14.	Sandys Parish Meeting	Tuesday, March 2 nd , 2021
15.	Sandys Parish Meeting	Thursday March 4 th , 2021
16.	Hamilton Parish, Smith's and Warwick Parishes Meeting	Monday March 8 th , 2021

PART II – CONSULTATION ANALYSIS PROCESS

Data Summary of Consultation Responses

A total of 131 consultation submissions, representing over 1000 consultees were submitted throughout the consultation period via electronic consultation form, email and by hand.

Of the 131 submissions, 108 were electronic consultation forms, 21 were emailed and 2 were received by hand. The submissions that were submitted via email or by hand took the form of letters, extensive reports, survey results and a video.

Of the responses submitted via email, some were from non-profit organizations and primary school PTAs. These included the West End Primary School PTA and Community, the St. George’s Community Response group, the St. George’s Preparatory School PTA, the East End Primary School PTA, Bermuda Education Network, and the Elliot Primary School Alumni Association.

The submission from the West End Primary School Community represented over 200 persons, the submission from the St. George’s Community Response group included over 700 signatures, and the submission from the Elliot Primary School Alumni contained 18 signatures. These, and all other submissions are published in the Parish Primary Consultation Submissions document.

The electronic consultation form asked a set of questions of respondents, including which stakeholder group or groups they represented. Those who submitted via the electronic consultation form identified with the following stakeholder groups:

Stakeholder groups	Number ¹
Parents	58
Other/Extended family member	22
Other community member	22
Business community member	7
Department of Education staff member	6
School staff member	11
Board governor	1
Non-Profit service provider	5
Student	2
Other	12

¹ The numbers reflect that some persons identified with more than 1 stakeholder group. For example, some parents are also staff members. Some extended family members may also be a Department of Education staff member.

Process for Analyzing the Parish Primary Consultation Submissions

Although the consultation submissions were extensive and lengthy, a thorough analysis of all consultation submissions was conducted as follows:

1. Review of all submissions

All of the submissions were reviewed, including questions and comments from the consultation meetings.

2. Initial organization of submissions

Due to the volume of responses (131 submissions of over 400 pages) and the nature of the consultation, points from the consultation submissions were organized by consultation question, parish and theme.

3. All key points were extracted and categorized by theme

In reviewing all submissions, there were several common themes that emerged. The key points from every submission were categorized by theme within their respective charts (i.e. the introduction of parish primary schools, parish proposals or a general category). A consultation point was determined to be key if it related to the vision, objectives and criteria for parish primary school, if it was raised as important by stakeholders, and/or if the point was raised a number of times during the consultation.

The themes are as follows:

- i. Parish primary concept
- ii. Effects on students
- iii. Factors, criteria and scoring
- iv. Information and data
- v. Building, infrastructure and siting
- vi. Finances
- vii. Human, financial and other resources
- viii. Birthrate and enrolment
- ix. Effects on the community
- x. Transportation and distance
- xi. History and legacy, and
- xii. Implementation and delivery

The key points were then synthesized within each theme, noting that some key points were interrelated and/or covered more than one theme.

4. Analysis of synthesized consultation points

The synthesized consultation points were then analyzed in relation to the vision, objectives and criteria for parish primary schools. Specifically, the analysis considered whether the consultation points:

- a. Related to the vision, objectives and criteria regarding parish primary schools
- b. Did not relate to the vision, objectives and criteria, or
- c. Did not relate to the vision, objectives and criteria, but were critical to the community.

5. Review and Analysis of Alternative Proposals

The alternative proposals were also extracted from the consultation submissions. Very similar alternative proposals were combined. The alternatives were then analyzed. The analysis considered whether the proposed alternatives:

- a. Related to the vision, objectives and criteria regarding parish primary schools
- b. Did not relate to the vision, objectives and criteria, and
- c. Did not relate to the objectives and criteria, but were critical to the community.

Consideration was given to whether there was any merit in alternative proposals that did not meet the vision, objectives and criteria.

For those alternative proposals that met the vision, objectives and criteria, a pro and con exercise was conducted. Consideration was also given to how the alternative proposal fit with the larger set of proposals, and whether or not the alternative proposal was feasible.

PART III – ANALYSIS OF CONSULTATION POINTS

The consultation points are organized by themes relating to all parishes and primary schools (i.e. systemically), and organized by themes relating to each individual parish. The analysis reflects key points collected from the 131 consultation submissions that extend to over 400 pages. Therefore, the analysis provided does not cover every single consultation point, but provides analysis of a detailed and extensive range of consultation points shared during the consultation process.

Points raised regarding one or more parishes, but which could be applied system-wide, were included within the systemic themes. For example, if an issue was raised within a consultation submission regarding students in general, this point was placed within the system-wide themes, but if an issue was raised about students specifically from a particular school or parish, the point was placed within the themes for that parish.

This analysis augments the consultation points and analysis provided in the Parish Primary Decision Report.

System-wide Themes Regarding Parish Primary Schools

	Themes	Consultation Points	Review, Consideration and Analysis
1.	Parish Primary Concept	<ul style="list-style-type: none"> Both agreement and disagreement was expressed regarding the introduction of the concept of parish primary schools 	<ul style="list-style-type: none"> The differing and mixed views regarding the creation of parish primary schools and the supporting reasons were thoroughly considered and analyzed, as demonstrated by the consultation points organized by theme.
		<ul style="list-style-type: none"> There are questions on how schools unaffected by closures get to stay open when they have received a lower score than other schools that will be forced to close. 	<ul style="list-style-type: none"> The scores for each primary school were considered by parish, and not nationally across all public primary schools. Due to geographic and demographic reasons, and to ensure that all children in a parish and zone can be accommodated in a parish primary school, schools need to be distributed across Bermuda. This is consistent with the Minister’s responsibility to ensure

			<p>that all children in all parishes are accommodated for primary school education.</p> <ul style="list-style-type: none"> • Some of the schools with lower scores are in parishes that have significant percentages of public school students that need to be accommodated. For example: <ul style="list-style-type: none"> ○ Pembroke Parish has 15.9% of public school students and 3 primary schools ○ Paget Parish has 10.2 % of public school students and 2 primary schools ○ Smith’s Parish has 10.3% of public school students and 1 primary school. • Some schools with higher scores are in parishes with lower percentages of public school students and a higher number of schools per parish. For example: <ul style="list-style-type: none"> ○ St. George’s Parish has 8.7% of public school students and 3 primary schools. ○ Southampton has 9.3 % of public school students and 3 primary schools. ○ Sandys Parish has 10.2 % of public school students and 2 primary schools. • To make decisions only based on scores and without regard to the location of the schools and the demography of the parish and zone would mean that there would be no primary schools in Pembroke, Paget or Smith’s and 2 schools in close proximity to one another in St. George’s, Southampton and Sandys Parish.
		<ul style="list-style-type: none"> • The parish primary concept is not required because existing primary 	<ul style="list-style-type: none"> • Some consultees expressed the view that the concept of parish primary schools is not required because existing primary schools already embody the

		<p>schools already embody the parish primary schools.</p>	<p>characteristics of parish primary schools. These views were also reiterated in submissions relating to specific parishes and primary schools.</p> <ul style="list-style-type: none"> • It is agreed that each of our 18 primary schools is an important part of our community and garner community support and investment. Our existing primary schools have developed and evolved over time, but have not been designed as parish primary schools, and do not fully meet the articulated criteria for proposed parish primary schools. • The significant community support provided to schools is valued and appreciated. However, it is also not consistent and lacks co-ordination across all schools. Parish Primary schools would provide a model for equity for community support and involvement across all primary schools. • Consideration was given to whether changes could be made across the board to public primary education so that more primary schools could, with Government and community support, develop the attributes of parish primary schools. • However, the vision, criteria and objectives for parish primary schools cannot reasonably be achieved across 18 primary schools. This is due to declining enrolment, the age and state of facilities, the need for equity and that precious human, financial and other resources would still be spread across 18 primary schools.
		<ul style="list-style-type: none"> • The parish primary concept goes against the Bermuda Review of Education 2007 (“Hopkins” Report). 	<ul style="list-style-type: none"> • The parish primary concept does not go against the recommendations of the Bermuda Review of Education, 2007 (“Hopkins Report”); the proposal does however

			<p>articulate a modern vision, and needed objectives for parish primary schools as part of Education Reform.</p> <ul style="list-style-type: none"> • The Hopkins Report was published 14 years ago. Since that time, prior Government administrations have considered and responded to the Hopkins Report, and identified which recommendations would be implemented and which ones would not, and the reasons why. • The Ministry has also introduced Plan 2022, which provides a new vision for the public school system that aligns with 21st century teaching and learning. • Lessons from the Hopkins recommendations and implementation have been learned and some of the Hopkins recommendations have been superseded by time and changes in the BPSS. • However, the areas covered by the Hopkins recommendations such as leadership, the quality of teaching and learning and curriculum are very much aligned to a modernized approach to implement the Vision <i>for</i> Learning as part of Learning First.
		<ul style="list-style-type: none"> • One school per parish may not be enough • Some parishes should be addressed individually as one school will not be enough for larger parishes • Population density for each parish should determine the number of parish schools in a given area. 	<ul style="list-style-type: none"> • The Ministry looked specifically at population and geography in the development of the parish primary school proposals. • Based on the population and enrolment projections, 10 primary schools are sufficient to accommodate the number of projected students (including preschools and the P7 and P8 years that will be added to primary schools once middle schools are phased out).

			<ul style="list-style-type: none"> • The proposals for 2 parish primary schools in Pembroke reflect a greater population density and travel patterns towards the center of Bermuda. • Parents would continue to have a choice of primary schools and enrolment would continue to be by zone. Therefore, students would not be required to enroll in a particular school because it is in their parish. This ensures that there are enough enrolment places in parish primary schools to accommodate the children that live in the zone.
		<ul style="list-style-type: none"> • Enrolment of 300 students is too high and there will be too many students in a class. 	<ul style="list-style-type: none"> • As the enrolment capacity of parish primary schools (up to 300 students, including 30 preschool students), is part of the proposed model, consideration was given to questions and concerns about the size of parish primary schools. • Specifically, concerns were raised that the culture of a larger school would be too impersonal. Additionally, in some parish submissions, a strong interest was expressed in maintaining small learning environments and class sizes. • It should be noted that as of September 2020, primary school enrolment ranged from 75 students at the smallest primary school to 193 students at the largest primary school. • The research identified in the consultation document indicates that 300 students is an appropriate and optimal number of students to be able to support 21st century learning and the services that would be part of parish primary schools.

			<ul style="list-style-type: none"> • School structures, schedules and resources are organized in ways to ensure that students are in cohorts and sections. • Although schools would be larger, class sizes would remain small as the maximum class size would be 15 students across all primary school year levels. • There are also a number of schools in Bermuda with enrolment that exceeds 300 students.
		<ul style="list-style-type: none"> • Primary schools should be left alone and the focus should be on providing safe environments and improving the quality of education for students. 	<ul style="list-style-type: none"> • Public education in Bermuda needs to change, including at the primary school level in order to improve the quality of education and to provide safe environments for students and staff. • Following considerable community calls for change, the Government has made a commitment to transform education, which includes improving the quality of education for each and every child across each and every public school, including at the primary level. • The status quo or minor changes won't provide equity and improve the education for all students for the following reasons: <ul style="list-style-type: none"> ○ We have too many primary schools for our declining enrolment ○ We need to better focus our resources around students ○ Our schools are aging and declining ○ 21st century fit-for-purpose learning facilities are needed to support the delivery of 21st century fit-for-purpose curricula.

		<ul style="list-style-type: none"> • Pilots and studies should be done before overhauling the entire public education system and there is a concern that the culture of larger schools will be too impersonal and structured. • This will allow methodologies to be tried, tested and improved before rollout of a nationwide scheme and a successful implementation will improve stakeholder confidence and support. 	<ul style="list-style-type: none"> • The introduction of a pilot instead of parish primary schools was considered. • However, the articulated vision and objectives for parish primary school are part of Education Reform and systemic in nature. Parish primary schools were proposed to be systemic and cover the entire provision of public primary education in order to bring change for the benefit of all students, families and staff. • A pilot would: <ul style="list-style-type: none"> ○ Take time, only focus on one (or two) schools, and significantly delay improvements needed for all schools. ○ Require a redirection of resources, and not resolve the underlying issues and concerns across the public education system. ○ Leave inequity in place across most primary schools. ○ Undermine the vision and objectives for the phasing out of middle schools and the introduction of signature schools because a pilot would not help prepare all students for the signature learning programmes at the senior level. ○ Also result in the delay of the phasing out of middle schools as students in the new P7 and P8 years need to be accommodated in primary schools. • Although a pilot isn't appropriate for creating parish primary schools, the Ministry would undertake a phased approach; therefore, lessons learned from each phase would be used to make improvements and adjustments across all parish primary schools.
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		<ul style="list-style-type: none"> • Contained within the executive summary on page 7, the [Parish Primary] Proposal explains that: “If we are to see improvements in education across all school and year levels, we must: <ul style="list-style-type: none"> ○ shift to an assessment programme that is varied, robust, relevant and enables students to demonstrate what they have learned in a variety of authentic ways ○ shift to a system-wide research-based 21st century instructional model for delivering the curriculum. ○ ensure that all teachers in our classrooms and all leaders of our schools have the qualifications and certifications needed to improve education outcomes for our students. • Again, we agree entirely with the above three action points, as a subset of the complete picture. What follows in the remaining 79 pages of the Parish Proposal is therefore particularly confusing, as it does not outline how any of these key action points are to be addressed. 	<ul style="list-style-type: none"> • These key actions points are being addressed through Learning First. • Rather than the Ministry solely deciding how the actions would be addressed in very specific terms, in order to develop effective, meaningful and sustainable change, the Ministry is involving stakeholders from the BPSS and broader community in the redesign of schools and the entire system through Learning First. This approach, which began in 2020 is similar to the one undertaken for the development of Plan 2022, which was written by education stakeholders and other community members. • The Ministry is confident in this approach because of the outcomes it would achieve by involving and drawing on the expertise of stakeholders in the process. If the Ministry solely decided how these points would be addressed, without input, it would be criticized for making decisions about and for stakeholders, without their involvement. This approach also goes further than input and consultation, because participants are being given the opportunity to co-design the future of schools.
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		<ul style="list-style-type: none"> The Parish Proposal is driven entirely around the quality of existing buildings with a somewhat peripheral supporting rationale as it correlates to successful education. Even if the quality of the building were to drive successful education, it could be argued that any school selected to remain open would require such significant modification of infrastructure to meet the new standard, that the scores concerning the condition of the properties become largely irrelevant. 	<ul style="list-style-type: none"> This is not correct. The proposal is based on a vision and objectives to provide high-quality, 21st century education for each and every child. This requires 21st century learning facilities. In addition, there are also other realities, such as declining birthrate and enrolment; aging and declining facilities; and the need for better, student-focused resources that are addressed by the proposal. The vision for parish primary schools was drawn directly from Plan 2022, which was a community-developed strategic plan. Primary school buildings, as they currently exist, cannot support the vision and plan to transform education to elevate all students. Excellent education for an entire education system requires fit-for-purpose 21st century curricula, which cannot be delivered equitably for all primary schools in outdated, outmoded and inadequate learning facilities. Any school that was proposed to remain open would require significant modification to its infrastructure, but the school sites proposed are the best and most appropriate sites for parish primary schools.
		<ul style="list-style-type: none"> It is hard to support the quality of building as a key correlate of education, when it appears to contradict the plethora of research done over the years around school effectiveness. One of the most prominent theories of effective education that is used today to shape education improvements is that of 	<ul style="list-style-type: none"> The need for safe, healthy, 21st century learning environments that can support 21st century curricula do not contradict the 7 referenced correlates of effective education. The 7 correlates are relevant, must be considered along with a plethora of other research and standards for education, including accreditation. Having safe and healthy 21st century facilities that can facilitate the

		<p>Lezotte, 1990. There have been many similar theories over time, but fundamentally these correlates remain largely unchanged. We must ensure that the actions taken on the way to transformational education reform align with that of current best practice to ensure we achieve optimum results for the children of Bermuda.</p> <ul style="list-style-type: none"> • The 7 Correlates of Effective Education (Lezotte,1990) are: <ul style="list-style-type: none"> ○ productive climate and culture, ○ focus on central learning skills, ○ appropriate monitoring, ○ practice-oriented staff development, ○ strong leadership, ○ salient parent involvement, and ○ high expectations and requirements • Links to the following organisations were provided: <ul style="list-style-type: none"> ○ Council of Ontario Directors of Education, Ontario, ○ District of Columbia Public Schools, Washington D.C. ○ Sunnyvale School District, California ○ Ypsilanti School District, Michigan 	<p>delivery of 21st century curriculum is an important part of the provision of education in which the 7 correlates exist.</p> <ul style="list-style-type: none"> • The jurisdictions cited by the consultees in reference to the 7 correlates have made significant investments in newer, more modern or refurbished school facilities. They also have significantly fewer school buildings to manage as a proportion of the student population. For example, Ypsilanti School District in Michigan has 11 schools for 3,840 students and Sunnyvale Elementary School District in California has 10 schools for 6,600 students. • Also, the District of Columbia Public Schools is undertaking a multi-year modernization and capital improvement programme, and in 2020, the Government of Ontario announced that it was investing: “Over \$500 million to build 30 new schools and make permanent additions to 15 existing facilities, supporting over 25,000 student spaces across the province. These new, modern schools will create the foundation for a 21st century learning environment for thousands of students across the province. This investment will also generate nearly 900 new licensed child care spaces to ensure families across the province are able to access child care in their communities.”ⁱ
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2.	Effects on Students	<ul style="list-style-type: none"> • Students need tailored programming and support. 	<ul style="list-style-type: none"> • Students need tailored programming and support. The proposals intend better-student focused resources, including services that are based on student strengths and needs.
		<ul style="list-style-type: none"> • There must be a focus on students with disabilities and special and/or additional needs and how they are impacted; there need to be sensible decisions made on student placement for students with special education needs; they shouldn't just be lumped together. 	<ul style="list-style-type: none"> • The improved focus on students with disabilities and special and/or additional needs is a critical aspect of the parish primary proposals. • As the parish primary model would consist of 10 primary schools, primary resources can be distributed across fewer numbers of schools. The question of resources isn't only about funds, but about securing qualified and trained staff with the skills to provide the required educational and therapeutic supports needed by students. • The Ministry is committed to the least restrictive environment, which means that students are placed in the learning environment that is least restrictive to meet their needs. • Most exceptional students would continue to be educated within their regular primary school in special education programmes. This would range from co-teaching and small group instruction in regular classrooms, to pull out for therapy, one-on-one special education teaching, to partially or fully segregated classrooms within their regular school. • Students would not be automatically grouped together based on their disabilities and special and/or additional needs.

		<ul style="list-style-type: none"> • Support was expressed as long as the opportunity for (at minimum) a decent education is afforded to all students which includes learning support or advanced learning. 	<ul style="list-style-type: none"> • The vision and objectives for parish primary schools are to ensure that all children receive a world-class education.
		<ul style="list-style-type: none"> • The current pandemic has shown us that smaller cohorts of students are beneficial for containment should there be another resurgence, thus there will need to be a delicate balance between economizing and being prepared for such eventualities. 	<ul style="list-style-type: none"> • The proposals consist of a lower maximum class size of 15 students per class. • Smaller cohorts of students can be accommodated in larger schools, through the school structure, scheduling and the numbers of sections for students. • Additionally, as it is proposed that schools be redesigned, 21st century design of schools have flexible learning environments and learning spaces that are adaptable, which is not currently possible due to the ways that schools have been constructed with difficult-to-move interior walls.
3.	Factors, Criteria and Scoring	<ul style="list-style-type: none"> • The “Comprehensive Rubric” for scoring the study factors is much more subjective as a result of being much less quantitative than that established during the SCORE report. There are significant discrepancies on how the SCORE report ranked schools and how the proposal ranks when essentially the criteria is extremely similar. • In fact, it is our understanding that in some instances data was taken directly from the SCORE report and utilized in this capacity in its original form. Many factors discussed earlier in this 	<ul style="list-style-type: none"> • The scoring process was not subjective. While it may appear to the drafters of this submission that the SCORE process was more rigorous based on the assumption that the Parish Primary process was much less ‘quantitative’, in actuality, the SCORE process collected qualitative data and then converted it to numbers for the purpose of quantitative scoring and prioritization. • It also needs to be noted that the SCORE Report and the Parish Primary School Proposals are documents written for different purposes. • The SCORE Report analyzed data that were collected about primary schools with the aim of providing recommendations for consolidation, special programmes and cost efficiencies.

		<p>document (p14) [of the parish primary consultation document] would deduce that the SCORE process was implemented more rigorously and consequently results would be more representative of the environment than the Proposal and therefore concern arises as to the reliability of the underlying data (p. 28) [of the parish primary consultation document].</p>	<ul style="list-style-type: none"> • The Parish Primary School Proposal offered proposals for improving the quality of education and the information included in the document was related to the vision and objectives for parish primary schools.
		<ul style="list-style-type: none"> • The Proposal groups the “Study factors” into 4 broad categories: i. Existing Building Conditions ii. Land/Property Conditions iii. Safety & Health iv. Transportation These categories were then allocated 20%/30%/30%/20% based upon “their level of importance”. • These allocations appear to be somewhat arbitrary and come with no additional information - of particular interest was a low 20% weighting allocated to existing building conditions, given of course that is the basis for the Parish Proposal. • Furthermore, although the scoring process was explained, the cumulative effect of the six person scoring along with the application of maximum ratio points means it is almost impossible to use this data to “unwind” the calculations to really understand how 	<ul style="list-style-type: none"> • Regarding the question of whether the percentage allocations for study factors were arbitrary, it is important to reiterate that the scoring team comprised primarily expert professionals with specialized technical knowledge of buildings, and/or who work on the Government primary school buildings on a daily basis. Their cumulative work experience spans facilities management, estate and property management, and, maintenance, repairs and renovations of Government office and school buildings. • Thus a structured process was followed when allocating the percent weightings to the four broad study factor categories, and, when scoring. The category, ‘Existing Building Conditions’ comprised the individual study factors: age, regulated (historic site), retaining wall issues, electrical, plumbing and HVAC. • Considerations for percent allocations were determined after assessing the current school building conditions based on the working knowledge of Estate Surveyors (age, retaining wall issues); the building lifespans using the Building Owners and Managers Association (BOMA)

		<p>the different schools scored against the rubric.</p>	<p>Preventative Maintenance Guidebook, which provided international standard rates that were adjusted for the local corrosive environment (electrical, plumbing and HVAC), the Department of Planning (regulated/historic site).</p> <ul style="list-style-type: none"> • The main basis of the parish primary proposal objective was to determine the best building location site for a 21st century learning environment in alignment with the vision (including the capability for the development of expanded curricular programmes such as ICT labs, STEAM education, family studies, design & technology, makers rooms, et. al.). This would account for the higher percent weight allocated to the study factor category Land/Property Conditions versus the Existing Building Conditions category. • The rubric for each study factor was mapped out with a rating scale of 1 to 5. The maximum score that a school could achieve would be 30 points if all 6 persons scored the school 5 points, or 18 points if all scored 3points and 6 points if all scored one point each. The individual line item study factor scores un-winds the cumulative effect for each broad category and reflects how each school scored against the rubric.
		<ul style="list-style-type: none"> • School performance should have been a factor and certain schools would have scored higher if school performance was used; high performing schools were penalized; high performing schools should not be closed; low performing schools should be closed. 	<ul style="list-style-type: none"> • This issue in particular was raised in reference to St. George’s Parish, and the opposite view that school performance should not be a factor was also submitted during the consultation in reference to Sandys Parish. • Consideration was given to whether or not school performance should be a factor in decisions on which

			<p>school sites should be established as parish primary schools and which schools should close.</p> <ul style="list-style-type: none"> • The following reflect consideration of academic performance and school performance in his decision-making. • <i>No definition for “high performing school” was put forward during the consultation</i> <ul style="list-style-type: none"> ○ Some consultees have asserted that “high performing” schools should not be closed, but have not defined what a “high performing school” is. The comprehensive St. George’s Community Response refers to academic and school performance, but does not put forward any definitions or criteria indicating what makes a school “high performing.” It also does not provide any information to support why it thinks that the 2 schools proposed for closure in St. George’s Parish, namely St. George’s Preparatory School or St. David’s Primary School are “high performing,” as opposed to other schools • <i>There is no measure of “school performance”</i> <ul style="list-style-type: none"> ○ There is no definition or measure of a “high performing school” or a “low performing school”. Therefore, it is not a basis upon which decisions on school closure can be based.
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			<ul style="list-style-type: none">● <i>P6 Checkpoint assessment results do not represent school performance</i><ul style="list-style-type: none">○ What is sometimes cited by some members of the community as “school performance” are the Cambridge Checkpoint assessment results taken by most public school students in their final year of primary school (P6).○ However, the P6 Checkpoint is a diagnostic test specifically designed for the purpose of “providing “feedback on a candidate's strengths and weaknesses in key areas.”² It also provides feedback on strengths and areas for improvement in teaching. The results are used by teachers to adapt their instruction to help students achieve a better understanding of what was taught, and to improve future student attainment and the quality of teaching.○ On the issue of using the P6 Checkpoint results as an indicator of school performance, or to rank schools, please see the verbatim statement from Cambridge Assessment International Education (“Cambridge.”): <i>Cambridge Assessment International Education (“Cambridge”), a division of Cambridge Assessment, recommends to the Ministry of Education that the P6 Checkpoint (and lower</i>
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			<p><i>secondary checkpoint) not be used to rank schools, or as an indicator of school performance, since they represent a single measurement of student performance. To broaden the application of the assessment scores would be a misinterpretation and misapplication of the results.</i></p> <p>Therefore, the Ministry cannot rely on the P6 Checkpoint results as an indicator of “school performance” because to do so would require the purposeful misinterpretation of the assessment data. Further, using performance as a factor would mandate the Ministry to misuse the P6 Checkpoint results as a measure of school performance, when they are actually diagnostic, in that they give feedback on the strengths and weaknesses of individual students and give feedback on strengths and areas for improvement in teaching.</p> <ul style="list-style-type: none">• <i>A number of factors contribute to student attainment</i><ul style="list-style-type: none">○ Noting that there is no definition or measure for school performance, it is also not fair to students to select schools based on how particular students perform on the P6 Checkpoint, when there is a preponderance of research to support that student achievement is impacted by a number of factors outside of the control of the learner.○ Those factors which impact student achievement include, but are not limited to, a student’s personal
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			<p>factors, their interactions with others and with other systems around them such as the school system, their neighborhood, the economy, political policy, and multicultural relationsⁱⁱ, in addition to the available resources within a school and the quality of teaching.</p> <ul style="list-style-type: none"> • <i>High quality teaching that contributes to student progress and attainment is transferable</i> <ul style="list-style-type: none"> ○ High quality teaching, which is a critical factor in student progress and attainment, is transferrable at the same standard to other school sites, including the site at East End Primary School. The introduction of parish primary schools and the resultant closure of identified primary schools would not be taking high quality school leadership and teaching out of the BPSS. Through Learning First, schools would be redesigned with community input, and would focus on further development of high quality school leadership and teaching, along with fit-for-purpose 21st century curricula, so that it is provided for each and every student in St. George’s Parish, the eastern zone and across Bermuda. • <i>The need for improvement in attainment and outcomes is systemic</i> <ul style="list-style-type: none"> ○ The data provided in the Parish Primary School Consultation document indicates that the need to improve student outcomes and attainment for <u>ALL</u> learners is systemic.ⁱⁱⁱ
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			<ul style="list-style-type: none"> ○ Despite some students achieving well, the assessment results are not where they need to be for all learners across every primary school. ○ There are systemic challenges in English, reading, math and science and a need for improvement in these and other areas in every primary school. ● <i>School performance as a factor does not achieve the objective of equity for each and every learner</i> <ul style="list-style-type: none"> ○ Noting that the P6 Checkpoint assessment results do not indicate school performance, the stated goal of equity for all primary schools and for all students cannot be achieved by using these assessment results. Schools have different capacities for meeting the vision based on a number of factors including inequitable resourcing. ● <i>School performance is not an indicator of whether schools can accommodate the vision and objectives for parish primary schools</i> <ul style="list-style-type: none"> ○ Noting that the P6 Checkpoint assessment results do not indicate school performance, these results are not an indicator of whether a school facility and site can accommodate the vision to realize the objectives to be achieved. An important part of the vision is ensuring that students are equitably accommodated in parish primary schools regardless of where they live. Therefore, parish primary schools must be spread out based on population, enrolment and geography.
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			<ul style="list-style-type: none"> • <i>The rationale for the parish primary school model is for the improved attainment and outcomes for all learners</i> <ul style="list-style-type: none"> ○ In response to community calls for change through Plan 2022 and as part of the Government’s mandate for Education Reform, the Ministry has developed a vision and objectives for parish primary schools based on the imperative to deliver 21st century education to elevate each and every learner. The parish primary model identifies moving together as a system to get where we need to be for the students of today and future generations. ○ The development and implementation of a vision and objectives for parish primary schools would result in a complete redesign of the primary schools as parish primary schools. All children would attend schools that are equitable, have the human, financial and material resources that they need, and consist of 21st century fit-for-purpose learning facilities that support delivery of 21st century fit-for-purpose curricula. • Through Learning First, each and every parish primary school would be redesigned with the involvement of learners, parents, educators and the broader community.
		<ul style="list-style-type: none"> • This proposal essentially penalizes those primary schools that are currently providing a high standard of education to our children as opposed to 	<ul style="list-style-type: none"> • The proposal does not penalize any individuals or schools, but rather was designed to meet the vision and objectives needed to improve education for each and every child as part of the larger commitment of Education Reform.

		<p>understanding better how they work and applying this model nationwide</p>	<ul style="list-style-type: none"> • Schools were scored based on study factors aligned with the vision and objectives for parish primary schools. • The Ministry has an excellent understanding of how schools work and the proposals include the parish primary model for the benefit of all students across primary education in public schools.
		<ul style="list-style-type: none"> • Schools in higher demand should stay open 	<ul style="list-style-type: none"> • Demand for school places changes and goes up and down over time. With the decline in enrolment, in recent years almost all schools are able to accommodate the vast majority, if not all P1 enrolment applications. • The primary school sites that were chosen are the best sites to achieve the vision and objectives for parish primary schools, which is distinct from demand for enrolment places. • Schools have either 1 or 2 streams (the number of intake classes of students) and decisions on the number of streams is based on a number of factors, including the space capacity to accommodate students and the interest in having a minimum number of students per class across each zone. • Demand for enrolment places isn't always reflected by the eventual enrolment of the school as some schools can only physically accommodate a smaller number of students.
		<ul style="list-style-type: none"> • More typically, when trying to improve a program, we tend to look towards its successes and work out how to build on those. Ample research suggests the aided school model yields superior 	<ul style="list-style-type: none"> • Depending on one's perspective, there are pros and cons to aided schools; however, there are significant barriers to creating additional aided schools; for example, the definition of aided schools requires the

		<p>results, with the ability of the school to hire its own staff, and harness accountability at all levels - yet this does not appear to be a consideration.</p>	<p>whole or part of the school property must be vested in a body of trustees or board of governors.</p> <ul style="list-style-type: none"> • Previous Governments have considered boards of governors for maintained schools; the Education Act 1996 was amended in 2015 to repeal boards of governors of maintained schools, except for CedarBridge Academy. • However, the Minister is considering the future of governance for the Bermuda Public School System and all public schools through the establishment of an Education Authority.
		<ul style="list-style-type: none"> • It is possible, with incredible commitment and governance (which has not been reflected in past performance), that many of these positive attributes can be rebuilt under the new structure with time, but the risk of implementation failure of such an approach would be inherently higher than with an approach that would keep these high performing schools in operation. Consider for example the OFSTED (Office for Standards in Education) inspection and regulation model in the UK. The rigorous inspection framework yields four overall judgements - Outstanding, Good, Requires Improvement and Inadequate. Those schools ranked Outstanding are exempt from regular inspections and 	<ul style="list-style-type: none"> • The submission refers to “high performing,” but doesn’t define the term. It refers to the Office for Standards in Education (OFSTED) inspection and regulation model in England, noting that “schools ranked Outstanding are exempt from regular inspections and will not be inspected again unless concerns are raised or some very specific conditions are met. However, as of November 13, 2020 maintained primary and secondary schools and academies judged as ‘outstanding’ in their overall effectiveness are now inspected every 4 years.^{iv} • OFSTED is a non-Ministerial Department of the Government of the U.K. and covers schools in England. • ‘Performance’ in the context of Bermuda education, is often substituted with how students perform on the Cambridge P6 Checkpoint assessment. • OFSTED doesn’t judge schools solely on how students perform on external assessments. Rather, as according to the U.K. Government:

		<p>will not be inspected again unless concerns are raised or some very specific conditions are met. Similarly, those schools ranked Good will only receive a short one-day inspection every four years. OFSTED focus their attention primarily on those schools that are not adequately performing in an effort to raise the overall standard of education nationally, and leave alone those systems that are currently performing as required.</p>	<ul style="list-style-type: none"> ○ “Inspectors will spend most of their time observing lessons and gathering evidence to inform their judgements. Inspectors will talk to a range of pupils and staff about important aspects of the school’s work. Inspectors will also take account of external views of the school’s performance. This may include any evaluation of the school’s performance by the local authority.”^v ● At this time, Bermuda does not have a framework in place for the inspection and ratings of schools. Therefore, schools are not judged by the Ministry or a body equivalent to OFSTED as ‘outstanding’, ‘good’, ‘requires improvement’ or ‘inadequate.’ Without such a framework in place that accurately captures the breadth of what makes a school ‘outstanding’, ‘good’ ‘requires improvement’ or ‘inadequate’ or other kinds of ratings, it is not fair to substitute parent or community perceptions of “school performance” or past student performance solely on external assessments. ● Further, and most importantly for the decision-making process, the vision and objectives to be achieved require a wholesale modernization of teaching and learning consisting of the delivery of a modern curriculum and programmes. ● School performance (whether actual or perceived) is not an indicator of whether a school facility and site can accommodate the vision to realize the objectives to be achieved, including equity for all children.
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4.	Information and Data	<ul style="list-style-type: none"> • It was suggested that the information provided in the Parish Primary Consultation Document was inadequate and had significant gaps in critical areas such as curriculum, instruction, assessment, teacher training, funding. Some consultees asserted that they could therefore not make informed decisions about the proposals. 	<ul style="list-style-type: none"> • Although significant information was provided in the Parish Primary Consultation Document and in the parish primary consultation meetings, there is information, including detailed descriptions of how the proposals would be implemented that wasn't included in the consultation. • This wasn't an oversight by the Ministry, but reflects the carefully constructed consultation, decision-making and school and system design process. • The intention was to first determine whether parish primary schools should be created, and if so which schools would become parish primary schools. If the Minister decided to create parish primary schools, the intention was for the design process to also be undertaken at a school-level, involving persons at those schools. • The development of critical areas such as curriculum, instructions, assessment, teacher training, etc. is part of Learning First and these critical elements are being co-created with members of the community • The information provided during the consultation related to the questions being asked in the consultation and enough information was provided to allow consultees to consider and respond to the questions being asked.
		<ul style="list-style-type: none"> • It was also indicated that the proposal did not provide evidence and lacked detail on how the Government's strategy will align with successful 	<ul style="list-style-type: none"> • Some of the information sought by consultees, regarding staff training, curriculum, programming, etc. are going to be developed as part of Learning First, pending the decisions made on parish primary schools.

		<p>primary-level strategies in small nations, such as:</p> <ul style="list-style-type: none"> • Increasing teacher stability 2. Improving teacher quality by requiring teachers to have a master’s degree 3. Instituting smaller class sizes 4. Implementing a focus on learning rather than targets, homework and testing 	<p>The approach taken builds on the community-developed Plan 2022, whereby members of the community, including parents, educators, business people, community leaders and other everyday citizens collaborate and engage members of the public on these critical areas.</p> <ul style="list-style-type: none"> • The approach being taken is a phased approach, whereby decisions are made on parish primary schools and whether or not to close particular primary schools and then depending on the decision, the subsequent design of the primary schools designated as parish primary schools.
		<ul style="list-style-type: none"> • The proposal identifies key implementation factors for success and then fails completely at addressing them. There are many fundamental areas not addressed in the Parish Proposal. The five interrelated priorities outlined in Plan 2022 have not been covered in synchronization. Only part of Proposal 4 is covered, which in our opinion is insufficient. • Furthermore, almost all of the complex and strategic items to be addressed (such as curriculum, instruction, assessment and accreditation) are not addressed. 	<ul style="list-style-type: none"> • The complex and strategic items to be addressed fall under Learning First which is underway. Rather than the Ministry solely determining how these strategic items should be addressed, the Ministry is involving constituents and stakeholders from the BPSS and broader community in the redesign of schools and the entire system through Learning First. This approach, which began in 2020 is similar to the development of a community-developed and community-owned strategic plan, where BPSS and other community members wrote Plan 2022. • The Ministry is confident in this approach because of the outcomes it would achieve in order to develop effective, meaningful and sustainable change, by involving constituents in the process. If the Ministry solely decided how these points would be addressed, without input, it would be criticized for making decisions about and for stakeholders, without their involvement. This approach also goes further than input and consultation,

			because participants are being given the opportunity to co-design the future of schools.
		<ul style="list-style-type: none"> We believe the Parish Proposal lacks sufficient detail for any person to make an informed decision to support. 	<ul style="list-style-type: none"> The Parish Primary Consultation document provides considerable information regarding the proposals, the reasons for the proposals and supporting data and information. This information relates directly to the proposals, including the vision and the objectives to be achieved. For reasons explained above, the strategic items would be developed as part of the school redesign process for the selected parish primary schools.
5.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> I disagree that school buildings are incapable of providing 21st century learning; all private schools in Bermuda have old buildings that have not been renovated, but modified to support IT upgrades and new programs. 	<ul style="list-style-type: none"> It is incorrect to assert that private school buildings haven't been renovated, but only modified. Most private schools in Bermuda have engaged in whole school upgrades and/or have built new state of the art facilities specifically to support curriculum delivery. Bermuda High School for Girls, Warwick Academy and Somersfield Academy ^{vi} have added new modern learning facilities, specifically for the delivery of 21st century curriculum in areas of STEAM, marine science, and the International Baccalaureate.
		<ul style="list-style-type: none"> This will not result in the best decisions on a location-by-location basis. The Proposal notes, "The primary schools within each parish have been evaluated using an assigned weighting for each of the study factors. Therefore, the final weighted scores for each primary school must be considered by parish, and not 	<ul style="list-style-type: none"> The scores for each primary school were considered by parish, and not nationally across all public primary schools because schools need to be spread out to account for demographics and geography. The boundaries are not arbitrary, but reflect the need for a school in each parish and 2 in Pembroke Parish. Due to demographic reasons, geography and to ensure that all children in a parish and zone can be

		<p>nationally across all public primary schools". Upon further review, we are still unable to link how the conclusion (second sentence) is derived from the statement (first sentence), however, in contrast, we do not believe that each primary school must be considered by parish.</p> <ul style="list-style-type: none"> • If, in fact, we did agree with this Proposal's methodology, at a minimum we would ask the question as to why the top 10 scoring schools overall were not selected, rather than utilizing an arbitrary geographical boundary? The impact of selecting the top school in each parish, versus the top 10 schools overall can be seen below – assuming school #10 in Devonshire is new. By implementing arbitrary parish boundaries in the selection criteria the outcome is only 5 of the top 9 (or 56%) of the top performing schools being selected. • There are questions on how schools unaffected by closures get to stay open when they have received a lower score than other schools that will be forced to close. 	<p>accommodated in a parish primary school, schools need to be distributed across Bermuda. This is consistent with the Minister's responsibility to ensure that all children in all parishes are accommodated for primary school education.</p> <ul style="list-style-type: none"> • Some of the schools with lower schools are in parishes that have significant percentages of public school students that need to be accommodated. For example: <ul style="list-style-type: none"> ○ Pembroke Parish has 15.9% of public school students and 3 primary schools ○ Paget Parish has 10.2% of public school students and 2 primary schools ○ Smith's Parish has 10.3% of public school students and 1 primary school. • Some schools with higher scores are in parishes with lower percentages of public school students and a higher number of schools per parish. For example: <ul style="list-style-type: none"> ○ St. George's Parish has 8.7% of public school students and 3 primary schools. ○ Southampton has 9.3 % of public school students and 3 primary schools. ○ Sandys Parish has 10.2 % of public school students and 2 primary schools. • To make decisions only based on scores and without regard to the location of the schools and the demography of the parish and zone would mean that there would be no primary schools in Pembroke, Paget or Smith's and 2 schools in close proximity to one another in St. George's, Southampton and Sandys Parish.
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6.	Finances	<ul style="list-style-type: none"> • It was posited that Parish primary schools are a fiscally prudent and cost effective approach due to the economic climate and the declining birthrate, it was suggested however, that there may be resulting negative social implications. 	<ul style="list-style-type: none"> • It is difficult to make the needed improvements within the status quo based on the decreasing number of students spread across 18 primary schools with the resources required. • Parish primary schools would result in changes for students, including a transition process and period. • However, the investment in improved 21st century education, services, learning facilities, along with the community-focused approach would provide significant benefits for students.
		<ul style="list-style-type: none"> • A number of concerns were expressed about the lack of costs estimates, and it was indicated that the current economic climate, along with the lack of cost estimates, which will be high is a reason not to proceed. 	<ul style="list-style-type: none"> • Concerns about the potential level of costs for the introduction of parish primary schools were considered. • The lack of investment in schools has been a common and consistent concern of parents/guardians, administrators, school staff, union representatives, service providers and other community members. The objective to improve the quality of education and student outcomes requires significant investment in the public education system. Distributing critical, but finite resources across 18 primary schools is inadequate and ineffective and undermines the ability to deliver high-quality education. Students of the BPSS must be educated in high-quality and safe facilities that can facilitate the delivery of fit-for-purpose 21st century curricula. • This cannot be achieved by maintaining or tinkering with the status quo. • The Minister and the Government have considered the potential costs of developing and refurbishing schools.

			<p>However, obtaining detailed costing estimates is an intensive process that requires significant information and the assessment and surveying of schools. In order to be accurate, detailed costings must also be based on scopes of work, which must be developed from the collaborative redesign of schools through Learning First. Therefore, the development of detailed cost estimates could not be undertaken until after decisions on primary schools were made. This approach would ensure more accurate cost estimates are generated that are targeted and focused on the schools that would serve as parish primary schools.</p> <ul style="list-style-type: none"> • The publication of general cost estimates could also undermine the Government procurement process as developers could bid to the cost estimates, rather than submit tailored bids. • In the past, Government has decided how much money it wanted to spend and then attempted to squeeze what it could do within that budget, rather than paying for the vision as needed.
		<ul style="list-style-type: none"> • The question was also posed asking if the proposal will save money. 	<ul style="list-style-type: none"> • The proposal was developed and designed to introduce a vision and meet objectives to improve the quality of education. • In the past, the tendency has been to look at how much money the Government wants to spend and what can be done within that set of funds. However, we must look at the types of student graduates that are needed to lead and contribute to the future of Bermuda. With this in mind, the focus was not on savings, but on improving the quality of education so that the profile of public

			<p>school students upon graduation is achieved in alignment with Plan 2022 and the future needs of Bermuda.</p> <ul style="list-style-type: none"> • While it may save money in the long-term, it would definitely result in the better use of resources to support students.
		<ul style="list-style-type: none"> • It was felt that there are better ways to invest less money in the education system, such as improving existing buildings and investing in IT, and that the focus should be on improving educational standards, rather than on finances. 	<ul style="list-style-type: none"> • A common complaint and refrain regarding public education is the lack of investment in schools. This was a significant point during the development of the SCORE Report and subsequent consultation process. It is also consistently raised by principals, parents and the Bermuda Union of Teachers. • The Ministry, Department, schools, staff, parents and students have been doing more with less for several years. • The improvement to buildings, IT and improving educational standards are critical elements of the parish primary proposals and require funds to implement.
		<ul style="list-style-type: none"> • It was stated that it doesn't make sense to close 8 schools to build a 9th school, referring to the proposed new school for Devonshire Parish. 	<ul style="list-style-type: none"> • As part of the Government's commitment to education reform, the Ministry considered and determined what it would take to deliver 21st century learning, and designed proposals that align to the vision and objectives. • Concerns regarding building a 9th school in Devonshire, on the site of the K. Margaret Carter Centre were considered as part of the alternative proposals suggested for Elliot Primary School.

			<ul style="list-style-type: none"> Note: Ultimately, a decision was taken to not build a 9th primary school on the site of the K. Margaret Carter Center, but to refurbish and renovate Elliot Primary School.
7.	Human and Financial and Other Resources	<ul style="list-style-type: none"> Parish primary schools (including fewer schools) is a better and more equitable use of resources, especially considering the decline in the birthrate. Consolidating schools will provide more resources for students Schools should be consolidated due to declining enrolment and to better resource schools. This includes having fewer, but better teachers. 	<ul style="list-style-type: none"> The vision and objective for parish primary schools require a fair and equitable distribution of resources. The Ministry would also be able to better harness, develop and distribute resources over fewer primary schools. Any changes would involve those directly affected, including staff.
		<ul style="list-style-type: none"> Ensure the support for all students, staff and teachers There must be critical consideration of the quality and support for principals and teachers and a need to ensure that they are highly skilled and effective. This could be through a review of staff. There is no point changing buildings if there isn't going to be a change in the quality of teaching. 	<ul style="list-style-type: none"> Through Learning First, the vision and objective for education reform will encompass a total modernization of teaching and learning, including the approach to learning investments and pedagogy. Improving teaching and learning for better outcomes are reasons for the proposals for parish primary schools.

		<ul style="list-style-type: none"> • There must be a sensitive approach taken to change management and transition, including for students. 	<ul style="list-style-type: none"> • It is absolutely agreed that a sensitive approach is needed to change management and transition, including for students. • A commitment has been made to transparency, involving stakeholders and sharing information to support the transition process, for students, and for staff.
8.	Birthrate and Enrolment	<ul style="list-style-type: none"> • The view was expressed that the declining birthrate is an important factor that supports the introduction of parish primary schools, including having fewer primary schools. 	<ul style="list-style-type: none"> • There were no submissions that indicated that declining enrolment should not be a significant factor in the proposals, although some consultees didn't agree that the Government should respond to declining enrolment by reducing the number of primary schools.
		<ul style="list-style-type: none"> • The concern was expressed that schools could become overcrowded if birth rates increase. 	<ul style="list-style-type: none"> • The birthrate has been declining for at least 30 years and is not projected to increase. • The proposed maximum enrolment for parish primary schools provides ample space for increases in enrolment.
9.	Community	<ul style="list-style-type: none"> • Consolidation of schools around a parish concept will also help to consolidate community support and talent and result in stronger PTSAs. 	<ul style="list-style-type: none"> • Shifting to one primary school per parish, and 2 in Pembroke, is a way to strengthen and improve parental engagement and school support as there would be a larger pool of parents to draw from and be involved in school-community activities.
		<ul style="list-style-type: none"> • There will be increased inequity and segregation. 	<ul style="list-style-type: none"> • The proposal would not lead to increased inequity and segregation as merging school communities would increase integration, cause more students to be educated within the same school, and improve equity across the system.

		<ul style="list-style-type: none"> • The proposal for parish primary schools will exacerbate gang activity. 	<ul style="list-style-type: none"> • Consideration was given to this point; however, it was not agreed that the proposal for parish primary schools would exacerbate gang activity. • The Ministry put this concern to the Inter-Agency Gang Enforcement Team on the threat of gangs to area parish schools, and received the following response: <ul style="list-style-type: none"> ○ <i>From a policing perspective there is no evidence to suggest that parish primary schools will increase gang activity. In-fact the formation and growth of gangs in Bermuda arose during the implementation of the Middle and Senior Schools concept. Generally, primary schools have a more intimate and support environment.</i> ○ <i>New education programmes will embed the importance of schools having both a duty and responsibility to protect their students and divert them away from gangs. It is well established that success in learning is one of the most powerful indicators in the prevention of youth crime.</i> ○ <i>Schools and in particular primary level, are recognised as places where early warning signs that younger children may be at risk of getting involved in gangs and where important interventions can take place to prevent negative behaviour. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched.</i> ○ <i>This is already evident in anti-gang programmes at the Primary level, like:</i> <ul style="list-style-type: none"> ▪ <i>Hype Kings Programme</i> ▪ <i>The GREAT Programme.</i>
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			<ul style="list-style-type: none"> As the new school restructuring is rolled out, the Ministry and Department of Education will be partnering with the various networks that provide programmes aimed to improve social and emotional skills, understanding risk, exploring how to stay safe and make safe choices for children
10.	Transportation and Distance	<ul style="list-style-type: none"> There is a concern with the distance students will have to travel as it will affect parents financially and the creation of congestion There is a vast concern with the reliability of public transportation, the volume of traffic surrounding schools and the management of pickup and drop off of students Transportation support should be given to parents who walk their children to school. 	<ul style="list-style-type: none"> The travel time between parish primary schools would vary from about 5 minutes to 20 minutes. With the exception of students who live in St. David's, most students would continue to live within 10 minutes of the closest available primary school. Especially considering what parish primary schools would provide for children, it is reasonable to expect some additional travel for students. Currently, subject to enrolment policy, parents have the choice of primary schools in the zone in which they reside, which means that they can and often do opt for primary schools that require travel by bus or by car. Transportation is an important concern as students need to get safely to and from school on time every day. This issue would be addressed by the provision of dedicated buses. Concerns about traffic and congestion would be addressed and managed over time by the design of refurbished primary schools. If needed, schools could also introduce traffic plans to facilitate the smooth drop-off and collection of students after school.

11.	History and Legacy	<ul style="list-style-type: none"> • Historical, including segregation are reasons for the current number of schools and contribute to barriers to change. • All schools are parish schools as the rationale for them historically was to address the need for education in the area (consolidate schools, segregation, or simply in need of education in an area) • The schools you are considering closing were built on the backs of our ancestors. • Loss of history when schools are closed down. 	<ul style="list-style-type: none"> • There were considerable views and strong feelings regarding the importance of history and legacy, and how history and legacy would be impacted by the introduction of parish primary schools. • History and legacy are important to schools, particular school communities and the broader community. • A number of submissions raised the issue of racial segregation, discrimination, and the resulting effects on particular schools and school communities. • As referenced in the consultation proposals, it was also noted how racial segregation meant a higher number of primary schools because separate schools for Black children and white children were mandated. • In considering the views regarding history and legacy and the reflections, which understand and respect history, historical wrongs should not be a hindrance or a barrier to making the necessary improvements to the public education and student outcomes. • A different view is taken that the history of education and public education in Bermuda, the longstanding inequities and the failure to make the changes needed are reasons to support the introduction of parish primary schools. • There is a need to preserve history and legacy, which can be achieved by the formation of committees involving school communities that document, honour and celebrate this critical part of Bermuda’s history.
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12.	Implementation and Delivery	<ul style="list-style-type: none"> • There is a concern about implementation and ensuring accountability. • Implementation should be well thought out and clearly articulated to stakeholders • identifies key implementation factors for success then doesn't name them No implementation plan has been provided as part of the consultation. • Such transformational change cannot be supported without a detailed understanding of how it is proposed that this is to be achieved, particularly in light of prior shortcomings surrounding implementation. • Understanding this detailed plan will improve stakeholder confidence. • The Ministry should share plans on implementation (transition of teachers and students, uniforms etc.) • There needs to be consistent, quality and meaningful communication throughout the process. • More transparency is needed on the timeline. • What structural improvements need to be made? When and how will this be done? i.e will the school buildings be worked on during summer holiday only, 	<ul style="list-style-type: none"> • The Ministry accepts and understands concerns regarding implementation and accountability. • However, a detailed implementation plan could not be developed until or unless specific decisions were made. • If the Ministry had developed a detailed implementation plan, it could have left the incorrect impression that decisions were already made, when the purpose of the consultation was to take views and feedback from education and community stakeholders to inform decisions on parish primary schools. • Considerable attention and efforts are being paid to implementation of Education Reform, which also consists of improving accountability. • During the consultation, it was explained that if the decision was made to establish parish primary schools, that a detailed implementation plan would be developed, which would consist of the work of a project and programme manager to map out a phased building programme. • An implementation timeline was dependent on whether or not a decision would be made to establish parish primary schools, and if so which schools would be established as parish primary schools.
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		<p>or while school is in session? Will summer be enough time to complete the renovations and/or additions?</p>	
		<ul style="list-style-type: none"> • A phased approach should be considered – targeting middle school reform, primary school consolidation, introduction of signature schools, building improvements, and the overall transformational improvement required in teaching standards, assessment criteria, and accreditation all at once is far too ambitious for even the most effective governance structures. 	<ul style="list-style-type: none"> • The Ministry is taking a phased approach to Education Reform. Work is underway to develop the first 2 signature schools, and it was proposed that full implementation of any decisions on parish primary schools would not begin until after the 2022/23 school year.
13.	Miscellaneous	<ul style="list-style-type: none"> • The report lacks an author. It does not identify those responsible for its production, their credentials and relevant experience in producing such a document. • It is important for the stakeholders to understand whether collectively there is sufficient experienced personnel involved in this process to be able to take an educated position on how much reliance can be placed on its content. 	<ul style="list-style-type: none"> • The Parish Primary School Consultation document was authored by the Ministry of Education, under the direction and authority of the Minister of Education, of the Government of Bermuda. This is standard practice in Bermuda and the Commonwealth. • The proposals reflect the Government’s commitment to Education Reform, community calls for change, and the priorities and strategies articulated in the community-developed and written Plan 2022. • The Parish Primary School Location Strategy Team comprised primarily expert professionals who have specialized knowledge of buildings, and/or currently work on the Government primary school buildings on a daily basis. Their education and qualifications, knowledge and experience in the areas of facilities management, estate and property management, and

			<p>maintenance, repairs and renovations of Government’s office and school buildings, qualified them to serve on the Parish Primary School Location Strategy.</p>
		<ul style="list-style-type: none"> • It was asserted that there was a lack of proper consultation regarding the parish primary proposals. • The lack of proper consultation results in less-informed decision making, lesser stakeholder satisfaction with regarding outcomes, and a lesser chance of successful implementation. “Public services, in particular, have embraced the approach, seeking involvement of the public in the development and shaping of future services to particular communities; an acknowledgement of the need to involve service users in service development, review and policy making. Thus, consultation has become a requirement in the successful development of public policy and service” (Carol Ann Morgan – B2B International). This was also called out in the 2015 SCORE Report Section V: Closing Considerations: “Consultation with impacted staff, parents, and other key stakeholders should take place early in the process to promote understanding, ownership and the 	<ul style="list-style-type: none"> • The Minister and Ministry have undertaken significant efforts and investment to ensure that the parish primary consultation was conducted fully and properly. • Early in the consultation process before a single consultation meeting took place, it was incorrectly asserted that the Ministry was running an unfair consultation.^{vii} • The starting point for engagement and consultation with constituents and stakeholders of the BPSS and community began several years ago in 2015 with the publication of the SCORE Report. One of its recommendations, which flowed from consultation and engagement was for the Ministry to undertake a strategic plan so that school reorganization decisions could be made in the context of a broader plan for improving public education for the BPSS. • Subsequently, under the direction of the Minister of Education, the Board of Education conducted significant engagement with education stakeholders and the broader community to oversee a strategic planning process, in which the final strategic plan, Plan 2022 was written by members of the community. The Plan was finalized and approved in 2017, after being presented to education stakeholders in consultation and engagement meetings held in the fall of 2017.

		<p>opportunity to contribute to the final outcome.” (SCORE Report – 2015)</p> <ul style="list-style-type: none"> • “It is common ground that, whether or not a consultation of interested parties and the public is a legal requirement, if it is embarked upon it must be carried out properly [as per the Gunning Principles]. To be proper, i. Consultation must be undertaken at a time when proposals are still at a formative stage; ii. It must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response; iii. Adequate time must be given for this purpose; and iv. The product of consultation must be conscientiously taken into account when the ultimate decision is taken... 	<ul style="list-style-type: none"> • Education Reform and the proposals for parish primary schools are a response to community calls for change in public education and reflect the aspirations of the community as articulated in the priorities and strategies in Plan 2022. For example, Plan 2022 strategy 5.35 states: “To ensure college and career readiness, review the current structure of schools (primary, middle, senior) and revise for maximum student success, including the consideration of special school designs to meet unique student needs or interests”, and strategy 4.6.3 is to “Develop and implement a long-term infrastructure renewal plan with building designs based upon modern pedagogical standards. This plan should outline a thoughtful strategy for renovating, rebuilding, and/or consolidating school facilities”. There are a number of other Plan 2022 strategies that would be delivered by the introduction of the parish primary school proposal. • Therefore, there was significant engagement and consultation with education stakeholders and the broader community that was relied upon through Plan 2022 to help shape the parish primary proposals. These proposals are consistent with and are intended to deliver the priorities and strategies of Plan 2022. • In the fall of 2020, the Minister shared that a consultation would be undertaken. The consultation was launched on December 18th, 2020 and concluded on March 12th, 2021. • A total of 20 consultation meetings were held. The Minister and Commissioner of Education presented at each meeting. Due to COVID-19 the meetings were held online using Zoom, with at least 1 public meeting and 1
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			<p>meeting per parish also simulcast on YouTube, Facebook and/or CITV.</p> <ul style="list-style-type: none"> • In addition to presenting during consultation meetings, the Minister listened to all of the questions and comments, and provided considered responses. • Subsequent to the end of the consultation period, the Minister reviewed, considered and analyzed all of the consultation submissions, including alternative proposals, taking into account the product of the consultation in the decision-making process and the ultimate decisions that were made regarding parish primary schools. • The Ministry is confident that it conducted a proper consultation as described in <u>Annex I</u>.
		<ul style="list-style-type: none"> • It was felt by many during the parish primary consultation meetings that the decisions had already been made and additional feedback was not well received. 	<ul style="list-style-type: none"> • It is unfortunate if any impression was left that “additional feedback was not well received.” • Consultation invariably involves a proposal that the Minister would like to undertake, supported by reasons and information. In responding to questions, the Minister and staff often explained the proposal and provided answers that were consistent with what is being proposed. That may have been incorrectly interpreted as the decision already being made. • The Minister’s responsibility is to consider the questions and feedback, including verbal and written consultation responses. This meant that during the consultation process, including at consultation meetings, the Minister kept his mind open and didn’t form final views on the comments, feedback, suggestions and alternatives until well after the conclusion of the

			<p>consultation period, and the review, consideration and analysis of the consultation submissions.</p> <ul style="list-style-type: none"> • This is a very rigorous and time-consuming process, that requires considerable thought and reflection, which is in contrast to providing immediate responses to feedback during consultation meetings.
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St. George's Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Effects on Students	<ul style="list-style-type: none"> • St. George parish has two separate and completely different educational needs. • The needs of St. David's should be met separately. 	<ul style="list-style-type: none"> • Student strengths and needs are diverse and vary within and between primary schools. The redesign of primary schools as parish primary schools would be based on a powerful and compelling vision of learning so <u>ALL</u> students can access learning that is personalized, among other elements for 21st century education. • Parish primary schools would accommodate up to 300 students, including preschool aged children. However, the current and projected population of the parish and surrounding areas within the central zone do not support the need for 3 primary schools within St. George's Parish.
		<ul style="list-style-type: none"> • Kids and families need stability during the pandemic 	<ul style="list-style-type: none"> • The importance of stability is acknowledged and agreed. • The timeframe for parish primary schools communicated during the consultation process was 3 to 5 years following the 2022/23 school year.
		<ul style="list-style-type: none"> • East End Primary should also remain open and its role serving students with learning differences should be developed. 	<ul style="list-style-type: none"> • Students with learning differences attend every primary school in Bermuda; while some schools have special programmes, for example the ASD programme, East End

			Primary School doesn't not have such a programme for students with learning differences.
2.	Factors, Criteria and Scoring	<ul style="list-style-type: none"> • Assessment of facilities were not carried out to the school's knowledge and so we question how the rating of Plumbing, HVAC and Electrical specifically has been derived • It is felt the building age is incorrectly represented as the building has undergone extensive and more recent renovations that have not been factored in. • SGPS lost points for Flood Risk when the building has never flooded and is situated at a high elevation. • SGPS lost significant points for accessibility when that can be easily addressed within proposed renovations and only affects a small part of the school. • It is surprising that St. George's Preparatory School scores less than the other schools in the category of proximity to Community Services, when clearly SGPS is the only school that is situated within the Town of St. George's. • Section 4.2 of the Primary Schools Study Factors Rubric awards points for close proximity of a bus stop. SGPS has 	<ul style="list-style-type: none"> • The scoring Team comprised of expert professionals with specialized technical knowledge of buildings who work on the Government primary school buildings on a daily basis. • The working knowledge of Estate Surveyors in addition to sourcing the Building Owners and Managers Association (BOMA) Preventative Maintenance Guidebook which provides international standard rates that were adjusted for the local corrosive environment for electrical, plumbing and HVAC. • The age of the building was sourced from the Ministry of Public Works, Department of Lands & Buildings, and is based on the oldest part of the building • Building age is a standard industry criterion when assessing buildings and was applied to all primary schools. • There is knowledge that flooding occurs on the western side of the school property which would not be practical for potential building in alignment with the 21st century vision for primary schools. • It is correct that St. George's Preparatory School is not fully-accessible. There are classrooms located upstairs. • It is not agreed that St. George's Preparatory School should have scored higher on community services even though it is located close to the Town of St. George's. East End Primary is also located relatively close to the Town of St. George's and is located very close to the St. George's Community Centre which provides after school and community programmes.

		<p>been disadvantaged in this section, with East End and St. David’s both achieving better scores. However, the Parish Primary School proposal assures us that public buses will be replaced by dedicated school buses. The dedicated school buses will of course be able to stop right outside the school, meaning this section of the score sheet is irrelevant and should be removed. Please note, for the past 3 years, SGPS does have a bus that comes to the unfinished Church.</p> <ul style="list-style-type: none"> • SGPS lost points for traffic congestion when that is not an issue even with COVID protocols, and will be a significant issue for the proposed East End site with the opening of the St. Regis Hotel. 	<ul style="list-style-type: none"> • This section of the score sheet is still relevant and the assessment is based on the current building location sites. The rubric explains the scoring. Children disembarking the bus have to walk a distance from the unfinished Church to the school entrance prior to walking in the yard and then into the school building. Children disembarking the bus at East End or St. David’s School walk right into the school yard and into the school building. • The narrow roads, leading to and from St. George’s Preparatory School, including Queen Street (a partial one-way and two-way road) leading to St. George’s Preparatory School do result in congestion for drop off and pick up of students; further, the St. Regis Hotel is slightly closer to St. George’s Preparatory School than it is to East End Primary School; traffic regarding the St. Regis Hotel is not considered to be an issue of concern during school hours if at all; however, noting a common way to travel to and from the location of the St. Regis Hotel to the Town of St. George’s or beyond via Government Hill Road, there is a likelihood that both St. George’s Preparatory School and East End would be affected by any traffic and congestion resulting from the St. Regis Hotel. • After considering the concerns raised about scoring, and after considering the number and variety of categories used for scoring, the scores identified did not have a material effect on the overall score for St. George’s Preparatory School.
		<ul style="list-style-type: none"> • The SCORE Report was more rigorous than the scoring for the 	<ul style="list-style-type: none"> • The SCORE Report and the Parish Primary School Proposals are documents written for different purposes.

		<p>recommendation of parish primary schools.</p> <ul style="list-style-type: none"> The “Comprehensive Rubric” for scoring the study factors is much more subjective as a result of being much less quantitative than that established during the SCORE report. There are significant discrepancies on how the SCORE report ranked schools and how the Proposal ranks when essentially the criteria is extremely similar. In fact, it is our understanding that in some instances data was taken directly from the SCORE report and utilized in this capacity in its original form. Many factors discussed earlier in this document (p14) would deduce that the SCORE process was implemented more rigorously and consequently results would be more representative of the environment than the Proposal and therefore concern arises as to the reliability of the underlying data. 	<ul style="list-style-type: none"> The SCORE Report analyzed data that were collected about primary schools with the aim of providing recommendations for consolidation, special programmes and cost efficiencies. Stakeholders were engaged to provide the information that was analyzed and then shared in the SCORE Report. The Parish Primary School Proposals offered proposals for modernizing and improving the quality of primary education and the information included in the document was related specifically to the parish primary proposals.
		<ul style="list-style-type: none"> It is believed there is an inconsistent rating of Land/Property conditions as a result of the Ministry suggesting they [the Government] do not want to spend money on a property they do not own but have not considered creative options to make this work (long term leasing, etc). 	<ul style="list-style-type: none"> The rating of Land/Property rating isn’t inconsistent as all school sites were rated using the same rubric and criteria. That St. George’s Preparatory School isn’t owned by the Government was not factored into did not affect the rating of its site.

			<ul style="list-style-type: none"> • However, the point has been made that the Government may not want to invest in a property that is privately owned, particularly with the potential of creating an empty building at the site of the East End Primary School when there are buildings that it does own that could be utilized.
		<ul style="list-style-type: none"> • St. George’s Prep is a high performing school which supports its students and parents 	<ul style="list-style-type: none"> • Consideration was given as to whether or not school performance should be a factor in decisions on which school sites should be established as parish primary schools and which schools should close. • The following reflect consideration of academic performance and school performance in his decision-making: • <i>No definition for “high performing school” was put forward during the consultation</i> <ul style="list-style-type: none"> ○ Some consultees have asserted that “high performing” schools should not be closed, but have not defined what a “high performing school” is. The comprehensive St. George’s Community Response refers to academic and school performance, but does not put forward any definitions or criteria indicating what makes a school “high performing.” It also does not provide any information to support why it thinks that the 2 schools proposed for closure in St. George’s Parish, namely St. George’s Preparatory School or St. David’s Primary School are “high performing,” as opposed to other schools

			<ul style="list-style-type: none">• <i>There is no measure for “school performance”</i><ul style="list-style-type: none">○ There is no definition or measure of a “high performing school” or a “low performing school”. Therefore, it is not a basis upon which decisions on school closure can be based. • <i>P6 Checkpoint assessment results do not represent school performance</i><ul style="list-style-type: none">○ What is sometimes cited by some members of the community as “school performance” are the Cambridge Checkpoint assessment results taken by most public school students in their final year of primary school (P6).○ However, the P6 Checkpoint is a diagnostic test specifically designed for the purpose of “providing “feedback on a candidate's strengths and weaknesses in key areas.”³ It also provides feedback on strengths and areas for improvement in teaching. The results are used by teachers to adapt their instruction to help students achieve a better understanding of what was taught, and to improve future student attainment and the quality of teaching.○ On the issue of using the P6 Checkpoint results as an indicator of school performance, or to rank schools,
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			<p>please see the verbatim statement from Cambridge Assessment International Education (“Cambridge.”):</p> <p><i>Cambridge Assessment International Education (“Cambridge”), a division of Cambridge Assessment, recommends to the Ministry of Education that the P6 Checkpoint (and lower secondary checkpoint) not be used to rank schools, or as an indicator of school performance, since they represent a single measurement of student performance. To broaden the application of the assessment scores would be a misinterpretation and misapplication of the results.</i></p> <ul style="list-style-type: none">○ Therefore, the Ministry cannot rely on the P6 Checkpoint results as an indicator of “school performance” because to do so would require the purposeful misinterpretation of the assessment data. Further, using performance as a factor would mandate the Ministry to misuse the P6 Checkpoint results as a measure of school performance, when they are actually diagnostic, in that they give feedback on the strengths and weaknesses of individual students and give feedback on strengths and areas for improvement in teaching.
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			<ul style="list-style-type: none"> • <i>A number of factors contribute to student attainment</i> <ul style="list-style-type: none"> ○ Noting that there is no definition or measure for school performance, it is also not fair to students to select schools based on how particular students perform on the P6 Checkpoint, when there is a preponderance of research to support that student achievement is impacted by a number of factors outside of the control of the learner. ○ Those factors which impact student achievement include, but are not limited to, a student’s personal factors, their interactions with others and with other systems around them such as the school system, their neighborhood, the economy, political policy, and multicultural relations^{viii}, in addition to the available resources within a school and the quality of teaching. • <i>High quality teaching that contributes to student progress and attainment is transferable</i> <ul style="list-style-type: none"> ○ High quality teaching, which is a critical factor in student progress and attainment, is absolutely transferrable at the same standard to other school sites, including the site at East End Primary School. The introduction of parish primary schools and the resultant closure of identified primary schools are not taking high quality school leadership and teaching out of the BPSS. Through Learning First, schools would be redesigned with community input, and would focus on further development of high quality school leadership and teaching, along with fit-for-purpose 21st century curricula, so that it is provided for each
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			<p>and every student in St. George’s Parish, the eastern zone and across Bermuda.</p> <ul style="list-style-type: none"> • <i>The need for improvement in attainment and outcomes is systemic</i> <ul style="list-style-type: none"> ○ The data provided in the Parish Primary School Consultation document clearly indicates that the need to improve student outcomes and attainment for <u>all</u> learners is systemic.^{ix} ○ Despite some students achieving well, the assessment results are not where they need to be for all learners across every primary school. ○ There are systemic challenges in English, reading, math and science and a need for improvement in these and other areas in every primary school. • <i>School performance as a factor does not achieve the objective of equity for each and every learner</i> <ul style="list-style-type: none"> ○ Noting that the P6 Checkpoint assessment results do not indicate school performance, the stated goal of equity for all primary schools and for all students cannot be achieved by using these assessment results. Schools have different capacities for meeting the vision based on a number of factors including inequitable resourcing. • <i>School performance is not an indicator of whether schools can accommodate the vision and objectives for parish primary schools</i>
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			<ul style="list-style-type: none"> ○ Noting that the P6 Checkpoint assessment results do not indicate school performance, these results are not an indicator of whether a school facility and site can accommodate the vision to realize the objectives to be achieved. An important part of the vision is ensuring that students are equitably accommodated in parish primary schools regardless of where they live. Therefore, parish primary schools must be spread out based on population, enrolment and geography. ● <i>Rationale for parish primary school model is for the improved attainment and outcomes for all learners</i> <ul style="list-style-type: none"> ○ In response to community calls for change through Plan 2022 and as part of the Government’s mandate for Education Reform, the Ministry has developed a vision and objectives for parish primary schools based on the imperative to deliver 21st century education to elevate each and every learner. The parish primary model identifies moving together as a system to get where we need to be for the students of today and future generations. ○ The development and implementation of vision and objectives for parishes would result in a complete redesign of the primary schools as parish primary schools. All children would attend schools that are equitable, have the human, financial and material resources that they need, and consist of 21st century fit-for-purpose learning facilities that support delivery of 21st century fit-for-purpose curricula.
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			<ul style="list-style-type: none"> • Through Learning First, each and every parish primary school would be redesigned with the involvement of learners, parents, educators and the broader community.
3.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> • It is felt the assessment of expansion capacity is not reflective of true potential; SGPS has historically housed 257 students. With a combined current enrolment in St. George's and St. David's of 258, and a projected future enrolment decline, this capacity should be more than sufficient. 	<ul style="list-style-type: none"> • Historical enrolment is not an indicator of the appropriate number of students a school can accommodate in the present and future, or of expansion capacity. • Since at least 1990, St. George's Preparatory School is recorded as not having more than 160 students. • In the past 10 years, the maximum class size for lower primary ranged from 15 to 18 students; however, around the year 2000, the maximum class size for lower primary school (P1 to P3) was lowered to 15 students and was previously as high as 25 or more students. The lower class sizes from the year 2000 to the present has resulted in a lower maximum enrolment for primary schools. Comparing past enrolment, especially historical enrolment when desks were largely organized in rows and specialized learning spaces were less common doesn't provide a true picture of the number of students that can be appropriately taught within the school's classrooms. • Specifically regarding expansion, East End Primary School has a larger acreage and more usable land for the purposes of expansion capacity. • Parish primary schools would consist of specialized learning spaces to accommodate expanding offering of curricula. Some of the specialized learning spaces that would be provided in parish primary schools such as science laboratories and makers rooms also do not currently exist within primary schools.

4.	Finances	<ul style="list-style-type: none"> • There is general concern on where the funds for renovating this school will come from. 	<ul style="list-style-type: none"> • Concerns about the potential level of costs for the introduction of parish primary schools were considered. • The lack of investment in schools has been a common and consistent concern of parents/guardians, administrators, school staff, union representatives, service providers and other community members. The objective to improve the quality of education and student outcomes requires significant investment in the public education system. Distributing critical, but finite resources across 18 primary schools is inadequate and ineffective and undermines the ability to deliver high-quality education. Students of the BPSS must be educated in high-quality and safe facilities that can facilitate the delivery of fit-for-purpose 21st century curricula. • This cannot be achieved by maintaining or tinkering with the status quo. • The Minister and the Government have considered the potential costs of developing and refurbishing schools. • The Government of Bermuda has made a commitment to reform education, including primary schools and has a mandate to do so. The Ministry of Education would work with the Office of Procurement and Project Management, and the Ministry of Public Works for funding models to support the introduction of parish primary schools to bring about necessary improvements to primary-level education.
		<ul style="list-style-type: none"> • The concern that government should not pay for renovations buildings located on land which belongs to a trust are outweighed by a greater public 	<ul style="list-style-type: none"> • In considering whether or not there is a greater public interest to keep St. George's Preparatory School open, the four main reasons why holistic and wide-ranging change is being undertaken, were re-examined, that being the:

		<p>interest- to keep a high performing school open</p>	<ul style="list-style-type: none"> ○ The Government mandate to deliver on its commitment to change and transform public education ○ Community demands for change and transformation through the development and articulation of Plan 2022: Bermuda’s Strategic Plan for Public School Education ○ The trend of declining enrolment, and ○ Most importantly, the need to improve student outcomes and attainment for <u>all</u> learners. ● Consideration was also given to: <ul style="list-style-type: none"> ○ The vision and objective to be achieved, including the need for equity for all students, in each school, parish and zone. ○ The best and most appropriate site to achieve the vision and meet the objectives for parish primary schools. ○ That while there may be strong community support for increasing the numbers of students who can attend St. George’s Preparatory School, historical enrolment (showing 5 year intervals) dating back to 1990 (when the school ranged from P1 to P7) indicated that its numbers did not exceed 160 students. ○ That in a small parish community that support for St. George’s Preparatory School could also be expanded and extended to East End Primary School, which is located less than 1 km away. ○ The reasons identified above regarding school performance demonstrate that it is not a fair,
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			<p>accurate or appropriate factor in decision-making for parish primary schools.</p> <ul style="list-style-type: none"> ○ The potential financial costs of the development and refurbishment of a parish primary school in St. George's parish and whether those funds should be invested in St. George's Preparatory School, even though East End Primary School is a more appropriate site to serve as a parish primary school. ● Also, noting the potential financial costs for a parish primary school in St. George's, and the importance of investing in education, the Minister considered whether public funds should be spent on a privately-owned school site (St. George's Preparatory School) when a more appropriate and larger school site to meet the Ministry's vision and objectives is available in close proximity, whose benefits would be wholly public. ● In considering these points, the Minister has determined that the public interest in developing and designing a parish primary school at the site of the East End Primary School is not outweighed by any public interest in keeping St. George's Preparatory School open.
5.	Human, Financial and Other Resources	<ul style="list-style-type: none"> ● It is felt that teachers should be consulted on first and that there should have been more community outreach to promote the consultation. 	<ul style="list-style-type: none"> ● Educators were on the Ambassador Design Team that wrote Plan 2022, and the Ministry and Department collect continuous feedback from educators and other education stakeholders through various methods. ● Educators are well represented on the design teams for Learning First and would continue to be involved in Education Reform. ● The Ministry conducted extensive community outreach during the consultation process and is committed to

			ongoing outreach. Examples of the efforts undertaken during the consultation are included in the Parish Primary Consultation Report published at www.moed.bm .
6.	Birthrate and Enrolment	<ul style="list-style-type: none"> • With a combined current enrolment in St. George’s and St. David’s of 258 students, and a projected future enrolment decline, this capacity should be more than sufficient. 	<ul style="list-style-type: none"> • The Ministry agree that students can be accommodated in one school in the East. • Enrolment will continue to decrease.
7.	Community	<ul style="list-style-type: none"> • Key stakeholders are satisfied with how things are currently. 	<ul style="list-style-type: none"> • The Ministry acknowledges that some key stakeholders may be satisfied with the status quo; however, there have been considerable and consistent calls for change in public education. • Education reform and parish primary schools call for an holistic approach to modernizing and improving education for all young people; therefore, the Ministry can’t bring forward the necessary changes and simultaneously maintain the status quo. • The changes proposed are drawn from Plan 2022, which indicated a review and revisiting of the structure of schools.
		<ul style="list-style-type: none"> • The St. David’s community already supports the school through after school programs, minibus services and a breakfast club to support families in need. • The closure of St. David’s Primary will have a negative impact on its 	<ul style="list-style-type: none"> • It is agreed that each primary school is an important part of the community and garners community support and investment. Our existing primary schools have developed and evolved over time, but have not been designed as parish primary schools, and do not fully meet the articulated criteria for proposed parish primary schools. • The significant community support provided to schools is valued and appreciated. However, it is also not consistent

		community such as the further closing of businesses and house prices.	<p>and lacks co-ordination across all schools. Parish Primary schools would provide a model for equity for community support and involvement across all primary schools.</p> <ul style="list-style-type: none"> • Consideration was given as to whether changes could be made across the board to public primary education so that more primary schools could, with Government and community support, develop the attributes of parish primary schools. • However, the vision, criteria and objectives for parish primary schools cannot reasonably be achieved across 18 primary schools. This is due to declining enrolment, the age of facilities, the need for equity and the as precious human, financial and other resources would still be spread across 18 primary schools.
8.	Transportation and Distance	<ul style="list-style-type: none"> • Interest is taken to the flow of traffic into St. George's and the accessibility of East End as the parish primary school • St. Georges and St. David's are spread out geographically. • Not including traffic, there is a 15-minute commute both ways from St. David's to St. George's. 	<ul style="list-style-type: none"> • With fewer primary schools, some students would have to travel farther to attend school. Especially considering what parish primary schools would provide for children, it is reasonable to expect some additional travel for students. • The Government currently provides mini-buses for students and concerns regarding public transportation would be addressed by the introduction of dedicated buses. • Potential issues regarding traffic and congestion around schools would be addressed and managed over time by the design of refurbished primary school sites. Traffic plans would also help to manage traffic and congestion to help ensure safe drop-off and pick-up of primary school students.

			<ul style="list-style-type: none"> • Students who live in St. David's and who would have to attend St. David's Primary School would have to travel farther to school than many of their peers. • However, there are students who currently live in St. David's who attend primary schools outside of St. David's. • The distance for most students from St. David's to East End Primary School is about 20 minutes; the travel time to Francis Patton Primary School is similar. While transportation may be a hardship for some parents, it would be addressed by the provision of dedicated buses.
9.	History and Legacy	<ul style="list-style-type: none"> • Many generations of families have attended St. George's Prep 	<ul style="list-style-type: none"> • The Ministry acknowledges and appreciates that many generations of families have attended St. George's Preparatory School, as is the case with other primary schools.
10.	Implementation and Delivery	<ul style="list-style-type: none"> • Utilize great staff and teachers from St. George's Prep in the new parish primary schools. 	<ul style="list-style-type: none"> • The plan is to grow and develop the quality of teaching; quality teaching is transferrable to other school sites.

Hamilton Parish

	Theme	Consultation Point	Review, Consideration and Analysis
1.	Effects on Students	<ul style="list-style-type: none"> How is this change going to affect Francis Patton? We love our principal and staff and we would hate to see them go. 	<ul style="list-style-type: none"> It was proposed that Francis Patton Primary school be redesigned and refurbished in line with the vision and objectives. Staffing decisions are long-term ones, and would be made over time considering the needs of each school, along with staff input.

Smith's Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Factors/Criteria/Scoring	<ul style="list-style-type: none"> I simply don't think it makes common sense to keep Harrington Sound open, which has a lower score than St. George's Prep, just due to its location. 	<ul style="list-style-type: none"> Where there is only 1 school per parish, that school is proposed to stay open due to population, geography and to accommodate students in the parishes and elsewhere in the zones. Smith's is relatively centrally located and is projected to have 200 students in 2023 and 185 students in 2027. The area will also need to accommodate preschool students and P7 and P8 students as middle schools are phased out. Closing Harrington Sound Primary School instead of St. George's Preparatory School would undermine the need to accommodate all students in the zone. It would also concentrate schools in the East, which isn't supported by the current or projected population of students.

2.	Implementation and Delivery	<ul style="list-style-type: none"> • There are concerns about how the change will affect schools staying open by default. 	<ul style="list-style-type: none"> • There would be a change in the schools staying open, in that they would be refurbished and redesigned, and take a higher number of students. • However, each parish primary school would be carefully redesigned, and the Ministry has committed to taking considerable input on the redesign of schools and the transition process.
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Devonshire Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Students	<ul style="list-style-type: none"> • There must be opportunities for inclusion through community programs. • Children with exceptionalities need extra space and resources and deserve a space designed for them. • Students with exceptionalities deserve a space for themselves. Therefore, all resources must be provided in the exceptionalities school. • Support is expressed for the plans for students with special needs • There is support with a school for exceptionalities 	<ul style="list-style-type: none"> • It is agreed that there must be opportunities for inclusion through community programmes. • A community approach is proposed, and through the school design process, there would be a number of opportunities for community input. • It is agreed that students, for which the exceptionalities signature school would be established, require additional space specifically designed to support their educational and therapeutic needs. • The space at the existing Dame Marjorie Bean Hope Academy limits the programming that can be provided to students; for example, there is no gymnasium and insufficient space for therapeutic services. • There are extensive benefits that would accrue from co-locating the exceptionalities signature school and the K. Margaret Carter Center on the same site. Examples include

			<p>shared services and placements for students as they transition to K. Margaret Carter Center.</p>
		<ul style="list-style-type: none"> • There is grave concern that separating children with special needs will cause more issues, such as bullying. • I agree that Dame Marjorie Bean Hope Academy's services need to be expanded. However, it is my hope that inclusion of the vast majority of children who have exceptional needs, i.e. accommodating their needs in mainstream, typical settings will remain as the philosophy of the Ministry. Children with exceptionalities need to be able to survive and thrive in mainstream society once they emerge from their public education process. • There is concern with the separation of students with exceptionalities and students attending parish schools • It is felt that catered learning for students with exceptional abilities should be provided in all parish schools to ensure they are able to thrive in society. 	<ul style="list-style-type: none"> • The first intake of students for the exceptionalities signature school is intended for students currently educated at Dame Marjorie Bean Hope Academy. • The Ministry is committed to the least restrictive environment, which means that students are placed in the learning environment that is least restrictive to meet their needs. • Most exceptional students would continue to be educated within their regular primary school in special education programmes, which would range from supports co-teaching and small group instruction in the regular classrooms, to pull out for therapy, one-on-one special education teaching, to partially or fully segregated classrooms within their regular school. • There is no intention to automatically grouped together based on their disabilities and special and/or additional needs.

		<ul style="list-style-type: none"> Specialized schools can also cater to children with dyslexia, language disorders, ADD, and other exceptionalities. 	<ul style="list-style-type: none"> The Ministry is committed to the least restrictive environment, meaning that students are placed in the learning environment that is least restrictive to meet their needs. Although specialized schools can educate and support children with other exceptionalities, the first intake of students for the exceptionalities signature school is intended for students currently educated at Dame Marjorie Bean Hope Academy. Other programmes will be considered in time. Most exceptional students would continue to be educated within their regular primary school in special education programmes, which would range from supports co-teaching and small group instruction in the regular classrooms, to pull out for therapy, one-on-one special education teaching, to partially or fully segregated classrooms within their regular school. There is no intention to automatically grouped together based on their disabilities and special and/or additional needs.
		<ul style="list-style-type: none"> The proposed re-use of Prospect Primary School involves the combination of two separate special needs educational programs onto one campus which is not Americans with Disabilities Act compliant. 	<ul style="list-style-type: none"> The proposal for the exceptionalities signature school was designed to better meet critical needs for both the students at Dame Marjorie Bean Hope Academy and the clients of the K. Margaret Carter Center (also referred to as KMCC). The legislation referred to is from the U.S. and is not applicable to Bermuda; however, there would be a careful and considered design of the programming for both the Dame Marjorie Bean Hope Academy and the K. Margaret

			<p>Carter Center. They would remain separate entities, but would benefit from shared facilities and services.</p>
		<ul style="list-style-type: none"> • It is believed that an alternative school should not be needed if the Learning First Model and diverse learning methods are successfully implemented. 	<ul style="list-style-type: none"> • There is a need for designated facilities and resources based on requirements of students with educational and social-emotional learning needs.
		<ul style="list-style-type: none"> • If there is a need for an alternative signature school, based on data, then we agree, as long as placing children in the least restrictive environment is still upheld. 	<ul style="list-style-type: none"> • We are cognizant of the sensitivities regarding placements into alternative education programming. • These decisions would be made based on the needs of students in line with the principle of the least restrictive environment.
		<ul style="list-style-type: none"> • Students with behavioral challenges deserve their own space. • Maximizing of space added features can be provided on-site to support social-emotional learning. • The idea to create a separate institution for students with social emotional needs due to trauma is troubling. 	<ul style="list-style-type: none"> • In some cases, students with educational and social-emotional learning needs require specific programmes, including therapeutic services that are best provided in a separate school placement.
2.	Factors	<ul style="list-style-type: none"> • There is concern with the proximity of MAWI being a deciding factor of whether to use Elliot as a parish primary school or not. 	<ul style="list-style-type: none"> • Proximity to MWI was not a deciding factor in proposing the site for the alternative signature school, although it was a consideration. • The alternative education signature school is required to be centrally-located as students would enroll from all over the Island.

		<ul style="list-style-type: none">• Elliot is ideal for a parish primary school as there is space for the addition of a preschool on-site.	<ul style="list-style-type: none">• The alternative proposal for the Elliot Primary School to serve as the parish primary school for Devonshire was considered, accepted and adopted.
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		<ul style="list-style-type: none">• Demographics of students with special needs must be shared to determine if such schools are needed.	<ul style="list-style-type: none">• The first students for the exceptionalities school are already known to the Ministry as they attend the Dame Marjorie Bean Hope Academy.• The exceptionalities signature school is needed to accommodate students at Dame Marjorie Bean Hope Academy and would also accommodate clients of K. Margaret Carter Center.• The exceptionalities signature school would have a smaller number of students than parish primary schools; however considerable indoor and outdoor space is required to deliver the required programmes and services, and to accommodate assistive technology and devices, as well as therapeutic devices.
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3.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> • There is an immediate need to improve the facilities at Dame Marjorie Bean Hope Academy. The Prospect Primary School site is ideally situated, as it is close to the hospital. 	<ul style="list-style-type: none"> • The Ministry agrees with the need for better facilities for students attending the Dame Marjorie Bean Hope Academy. • Having a site centrally-located and close to the hospital is a critical factor in the site proposed.
		<ul style="list-style-type: none"> • The location of Elliot Primary School for the alternative education signature school is good and in a less dense and more open neighbourhood area. 	<ul style="list-style-type: none"> • These points are noted and acknowledged as reasons supporting the proposed location for the alternative education signature school.
		<ul style="list-style-type: none"> • There is concern on the proximity of the Exceptionalities school and CedarBridge 	<ul style="list-style-type: none"> • Proximity of exceptionalities signature school to CedarBridge Academy is a benefit for both schools so that students plus for integration and mainstreaming.
		<ul style="list-style-type: none"> • There is question as to why the exceptionalities and alternative school have to be in the same parish. 	<ul style="list-style-type: none"> • The exceptionalities and alternative signature schools do not need to be in the same parish, but they need to be centrally-located to be accessible for students from all parishes. • The exceptionalities signature school also needs to be centrally-located, and more specifically needs to be close to KEMH VII Hospital due to the medical needs of some students.
		<ul style="list-style-type: none"> • There is concern that making Prospect primary more accessible for the clients at K. Margaret Carter Center would be an expensive process. 	<ul style="list-style-type: none"> • In looking at available options, there are significant limitations and challenges with the current site of the Dame Marjorie Bean Hope Academy, such that it is not suitable to serve as the exceptionalities signature school. • Therefore, the Ministry needed to propose a site that would be appropriate and large enough to accommodate students at Dame Marjorie Bean Hope Academy, as well as clients of the K. Margaret Carter Center.

		<ul style="list-style-type: none"> • It is more cost effective to upgrade than build a new school on the Margaret Carter Success Academy 	<ul style="list-style-type: none"> • Following submissions on this point, the Ministry agrees that it may be more cost effective to renovate a school, rather than construct a newly-built primary school.
		<ul style="list-style-type: none"> • Due to the parish’s population size, the parish primary school should be centralized in the parish. 	<ul style="list-style-type: none"> • This concern was considered in the context that the proposed site for the Devonshire Parish primary school is located in the central zone and close to Victor Scott Primary School, and was considered relating to points for alternative proposals that Elliot Primary School should become the parish primary school for Devonshire Parish.
4.	Community	<ul style="list-style-type: none"> • Elliot Primary already embodies a parish school • Elliot has many community partners, including the Elliot Trust which sponsors scholarships for students pursuing post-secondary education. Alumni association donates hampers to families in need for children who attend the school. Wolves football club. 	<ul style="list-style-type: none"> • It is agreed that each primary school is an important part of the community and garners community support and investment. Our existing primary schools have developed and evolved over time, but have not been designed as parish primary schools, and do not fully meet the articulated criteria for proposed parish primary schools. • The significant community support provided to schools is valued and appreciated. However, it is also not consistent and lacks co-ordination across all schools. Parish Primary schools would provide a model for equity for community support and involvement across all primary schools. • Consideration was given as to whether changes could be made across the board to public primary education so that more primary schools could, with Government and community support, develop the attributes of parish primary schools. • However, the vision, criteria and objectives for parish primary schools cannot reasonably be achieved across 18 primary schools. This is due to declining enrolment, the age of facilities, the need for equity and the as precious human,

			financial and other resources would still be spread across 18 primary schools.
5.	Transportation and Distance	<ul style="list-style-type: none"> • There is a concern that concentrating services for special needs students might make it difficult for families that don't live near the school. 	<ul style="list-style-type: none"> • The first students and clients to be accommodated at the exceptionalities signature school already attend Dame Marjorie Bean Hope Academy and the K. Margaret Carter Centre, which are centrally located.
6.	History and Legacy	<ul style="list-style-type: none"> • Disagreement was expressed regarding the rationale to repurpose Elliot Primary School for many reasons: The history of Elliot takes one from a one-room schoolhouse built by 12 freed Black men (former slaves) back some 200+ years ago to a school further along on Jubilee Road to the present site of the school on Hermitage Road. • In my mind the legacy left behind and the vision of those 12 Black men to build a school so that their children could receive an education is something to be celebrated, not re-branded. (I have a feeling that if Mary Prince had been allowed an education, she would have attended Elliot primary!) • Elliot Primary has a lot of history attached to it thus, there is concern for its loss. History behind the 'building is loaded and reflective of Bermuda's history. To see the school-community 	<ul style="list-style-type: none"> • Consideration was given to whether other factors, such as history and legacy, should have been considered in the rationale for the Devonshire Parish proposal. • The rationale for the alternative signature school was based on the need within the education system and community to better support students who require alternative education. • As important as history and legacy are to particular school communities and the broader community, they were not part of the rationale as they do not directly relate to how to best achieve 21st century learning to improve the quality of education and student attainment and outcomes for all students. • A number of submissions cited the history of racial segregation as a reason not to close certain schools. Rather than allow historical wrongs and longstanding inequities to be a barrier to the imperative to change education, because schools and the education system were built on a foundation of inequity, Bermuda's difficult history and the lasting legacy instead indicate that the system needs to be transformed. • There is a however critical need to preserve and honour history and legacy. Some consultees have made suggestions on the potential renaming of parish primary schools.

		<p>connection and spirit reflected in the children visiting the original site and walking to the various points of the school is affirming that the spirit of the founders continues.</p>	<ul style="list-style-type: none"> ● Rather than the Ministry deciding how this would be achieved, the Ministry proposes to draw on the knowledge, experiences and memories of our school communities by inviting community members on the best ways to document, honour and celebrate critical aspects of Bermuda's history. ● The consultation submissions and the strength of views on the importance of history and legacy were balanced with the strong imperatives to improve education, the longstanding inequities, the declining enrolment, and the failure to make the changes needed indicate the need for parish primary schools.
7.	Implementation and Delivery	<ul style="list-style-type: none"> ● There is concern on what the curriculum would look like for both the alternative and exceptionalities school (students with separate special needs programs will be housed together at the exceptionalities school) 	<ul style="list-style-type: none"> ● The need for the best and most appropriate curricula for the exceptionalities signature school and the alternative education signature are considered to be critical aspects of the school redesign process. ● Within the curricula, programming for each student would also be individualized through individual education plans and other kinds of written, measurable plans to support students' education, development and progress.

Pembroke Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Factors, Criteria and Scoring	<ul style="list-style-type: none"> Northland's is one of the better schools in Pembroke. 	<ul style="list-style-type: none"> The other 2 primary schools in Pembroke are the best and most appropriate sites for parish primary schools, and are therefore a better option than Northlands Primary School. Northlands Primary School was previously a secondary school, has a very small footprint and playground area; the field is also across the street, which is a safety concern.
2.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> It is believed that Pembroke should have 3 parish schools Leave all schools in Pembroke open 	<ul style="list-style-type: none"> There is a need to spread out the primary schools. The population in and surrounding Pembroke doesn't support the need for 3 schools. Northlands Primary School was determined to not be the best choice available for a parish primary school and has a small footprint.

Paget Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Students	<ul style="list-style-type: none"> In reference to Gilbert Institute, smaller environments are believed to be best suited for children with hearing difficulties 	<ul style="list-style-type: none"> The research identified in the consultation document indicates that 300 students is an appropriate and optimum number of students to be able to support 21st century learning and the services that would be part of parish primary schools. School structures, schedules and resources are organized in ways to ensure that students are in cohorts and sections. Although schools would be larger, class sizes would remain small as the maximum class size would be 15 students across all primary school year levels.

			<ul style="list-style-type: none"> • There are also a number of schools in Bermuda with enrolment that exceeds 300 students.
2.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> • It is agreed that Paget Primary is an ideal location for the Paget parish primary school 	<ul style="list-style-type: none"> • Based on the scoring, the Ministry agrees that Paget Primary School is the best and most appropriate site for the parish primary school for Paget Parish.
3.	Community	<ul style="list-style-type: none"> • Gilbert is already a strong and diverse community school. 	<ul style="list-style-type: none"> • It is agreed that each primary school is an important part of the community and garners community support and investment. Our existing primary schools have developed and evolved over time, but have not been designed as parish primary schools, and do not fully meet the articulated criteria for proposed parish primary schools. • The significant community support provided to schools is valued and appreciated. However, it is also not consistent and lacks co-ordination across all schools. Parish Primary schools would provide a model for equity for community support and involvement across all primary schools. • Consideration was given as to whether changes could be made across the board to public primary education so that more primary schools could, with Government and community support, develop the attributes of parish primary schools. • However, the vision, criteria and objectives for parish primary schools cannot reasonably be achieved across 18 primary schools. This is due to declining enrolment, the age of facilities, the need for equity and the as precious human, financial and other resources would still be spread across 18 primary schools.

4.	Transportation and Distance	<ul style="list-style-type: none"> There is a concern for the increase of traffic around the proposed parish primary school site 	<ul style="list-style-type: none"> Dedicated buses are part of a vision. schools can have traffic plans and congestion can be managed/prevented by design and renovations
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Warwick Parish

	Theme	Consultation Point	Review, Consideration and Analysis
1.	Miscellaneous	<ul style="list-style-type: none"> Support expressed for Purvis as a parish primary school. 	<ul style="list-style-type: none"> The support expressed is consistent with Purvis Primary School being the best and most appropriate site for the parish primary school for Warwick Parish.

Southampton Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Building, Infrastructure and Siting	<ul style="list-style-type: none"> A question was raised regarding the current facilities of Dalton E. Tucker and whether it is equipped for an increase of students. 	<ul style="list-style-type: none"> The Dalton E. Tucker site would be refurbished; the site is large enough as it consists of the footprint of the primary school and the adjacent Southampton Preschool. Parish primary schools would be able to accommodate up to 300 students.
		<ul style="list-style-type: none"> Port Royal is believed to be more suited to accommodate grades P1 to P8. 	<ul style="list-style-type: none"> Port Royal was determined not to be the best and most appropriate site for the parish primary school for Southampton Parish. The site is not large enough and along with the site's topography doesn't lend itself to be the best option for the parish primary school for the parish.
		<ul style="list-style-type: none"> Southampton is the largest parish There is a concern about there being one school that isn't centrally located to service students within one of the biggest parishes. 	<ul style="list-style-type: none"> While Southampton is long, it is not the largest parish and has the 3rd lowest projected student population.

		<ul style="list-style-type: none"> It is believed that two schools will better serve Southampton parish (Port Royal and Heron Bay are recommended to stay open) 	<ul style="list-style-type: none"> The population does not support the need for 2 primary schools in the parish. Dalton E. Tucker was proposed as the best and most appropriate site to accommodate the vision and objectives for a primary school for the parish.
2.	Human, Financial and Other Resources	<ul style="list-style-type: none"> Port Royal has a Trust, whose funds would be lost if the school is closed. 	<ul style="list-style-type: none"> Citing confidentiality, the Ministry was not provided with detailed information about the Trust, but was advised that there is a discretionary Trust, that funds are spent as the Trustee determines in the best interest of the school, and that if the school ceased to operate that the funds would be applied elsewhere. It should be noted that the funds are not within the discretion of the Ministry to spend, and even if funds were available, the unofficial dollar amount shared with the Minister by consultees doesn't supersede that Port Royal Primary School was not determined to be the best and most appropriate site for the Southampton parish primary school.
3.	Transportation and Distance	<ul style="list-style-type: none"> Having two schools will allow for convenient travel and easy access to the schools 	<ul style="list-style-type: none"> Bermuda is small and the distance between the proposed schools is reasonable. The majority of students in the Western Zone would continue to live within 10 minutes of the primary schools in the zone. Parish Primary Schools would also benefit from dedicated buses for transportation.

Sandys Parish

	Theme	Consultation Points	Review, Consideration and Analysis
1.	Students	<ul style="list-style-type: none"> • There is concern for students with special needs within this community. 	<ul style="list-style-type: none"> • Student strengths and needs are diverse and vary within and between primary schools. The redesign of primary schools as parish primary schools would be based on a powerful and compelling vision of learning so <u>ALL</u> students can access learning that is personalized, among other elements for 21st century education. • The work of Education Reform is intended to improve education and programming for all children, including those with disabilities.
2.	Factors, Criteria and Scoring	<ul style="list-style-type: none"> • There is a concern with the closure of West End when primary schools that have scored lower on the rubric are being kept open. • West End's total weighted score on the Ministry's buildings evaluation (55.88%) is higher than four of the parish schools which are to remain open... West Pembroke (50.11%), Harrington Sound (50.44%), Victor Scott (51.64%) and Paget Primary (52.85%) 	<ul style="list-style-type: none"> • The scores for each primary school were considered by parish, and not nationally across all public primary schools. • Due to demographic reasons, geography and to ensure that all children in a parish and zone can be accommodated in a parish primary school, schools need to be distributed across Bermuda. This is consistent with the Minister's responsibility to ensure that all children in all parishes are accommodated for primary school education. • Some of the schools with lower schools are in parishes that have significant percentages of public school students that need to be accommodated. For example: <ul style="list-style-type: none"> ○ Pembroke Parish has 15.9% of public school students and 3 primary schools

			<ul style="list-style-type: none"> ○ Paget Parish has 10.2 % of public school students and 2 primary schools ○ Smith’s Parish has 10.3% of public school students and 1 primary school. ● Whereas some schools with higher scores are in parishes with lower percentages of public school students and a higher number of schools per parish. For example: <ul style="list-style-type: none"> ○ St. George’s Parish has 8.7% of public school students and 3 primary schools. ○ Southampton has 9.3 % of public school students and 3 primary schools. ○ Sandys Parish has 10.2 % of public school students and 2 primary schools. ● To make decisions only based on scores and without regard to the location of the schools and the demography of the parish and zone would mean that there would be no primary schools in Pembroke, Paget or Smith’s and 2 schools in close proximity to one another in St. George’s, Southampton and Sandys Parish.
		<ul style="list-style-type: none"> ● The number of classrooms at West End exceeds that of Somerset Primary. 	<ul style="list-style-type: none"> ● This is not correct. However, the number of classrooms isn’t directly related to which school can better accommodate the vision and objectives for parish primary schools.
3.	Finances	<ul style="list-style-type: none"> ● There is interest in the differences of cost to refurbish of both West End Primary School and Somerset Primary School. 	<ul style="list-style-type: none"> ● Decisions on parish primary schools need to be made prior to a full costing; however, the differences in refurbishment costs were not study factors in the scoring of primary schools.

4.	Building, Infrastructure, and Siting	<ul style="list-style-type: none"> ● It is believed that West End is physically capable of being the Sandy's parish primary school as it has previously housed a large number of students, has more classrooms than Somerset Primary, provides room for age-appropriate play, and is housed in a safe location. ● Assigning Somerset Primary as the parish primary school is not supported. ● It is strongly recommended that West End be developed to serve as the parish primary school for Sandys. 	<ul style="list-style-type: none"> ● The considerable views that disagree with the proposal have been reviewed, considered and analyzed. ● Somerset Primary School received a higher overall score than West End Primary School, and was proposed as the best most appropriate site for the parish primary school because it: <ul style="list-style-type: none"> ○ Is a larger site and has more expansion capability than West End Primary School, which is surrounded by residences and roads ○ Has a separate building for a preschool ○ Already has separate and larger parking and play areas for both the preschool and the primary school ○ Is close to Warren E. Simmons Field which can provide additional learning spaces which can support the delivery of the curriculum.
		<ul style="list-style-type: none"> ● Consultees suggested going up a storey for West End Primary School so it could be the parish primary school. 	<ul style="list-style-type: none"> ● Providing an additional storey does increase the size of the building, but not the available greenspace.
5.		<ul style="list-style-type: none"> ● The location of Somerset Primary isn't as safe as West End as it is occupied by gangs, does not have adequate fencing around the property and the darkness during the winter months raises concerns on safety of children who attend after school programs. 	<ul style="list-style-type: none"> ● The reference to gangs is not correct and was denied by the Inter-Agency Gang Enforcement Team. ● Any questions of safety, for example in reference to fencing or darkness would be considered in the renovation of the site.
6.	Community	<ul style="list-style-type: none"> ● West End already embodies a parish school. 	<ul style="list-style-type: none"> ● It is agreed that each primary school is an important part of the community and garners community support and investment. Our existing primary schools have developed and evolved over time, but have not been

			<p>designed as parish primary schools, and do not fully meet the articulated criteria for proposed parish primary schools.</p> <ul style="list-style-type: none"> ● The significant community support provided to schools is valued and appreciated. However, it is also not consistent and lacks co-ordination across all schools. Parish Primary schools would provide a model for equity for community support and involvement across all primary schools. ● Consideration was given as to whether changes could be made across the board to public primary education so that more primary schools could, with Government and community support, develop the attributes of parish primary schools. ● However, the vision, criteria and objectives for parish primary schools cannot reasonably be achieved across 18 primary schools. This is due to declining enrolment, the age of facilities, the need for equity and the as precious human, financial and other resources would still be spread across 18 primary schools.
7.	Transportation and Distance	<ul style="list-style-type: none"> ● The site of West End is conveniently situated to public transport and Sandy's town. 	<ul style="list-style-type: none"> ● Transportation is one of many factors to be considered in the decision. ● West End scored higher than Somerset Primary on transportation, but overall, Somerset received a higher score.

<p>8.</p>	<p>History and Legacy</p>	<ul style="list-style-type: none"> ● It is believed that the score for West End Primary School would have outnumbered that of Somerset Primary School if community legacy or cultural values were included in the scoring process. ● It was expressed that improving our education system should not be at the expense of the history and legacy of schools (West End Primary). ● It is believed that our schools are more than buildings, they house parish and personal histories which should be cherished. 	<ul style="list-style-type: none"> ● Consideration was given to whether other factors, such as history and legacy, should have been considered. ● The factors used to develop the proposals for parish primary schools were based on the vision and objectives to be achieved, and were driven by the need for 21st century learning to meet the needs of young people, well into the future. ● As important as history and legacy are to particular school communities and the broader community, they were not part of the scoring process because the study factors were directly related to how to best achieve 21st century learning to improve the quality of education and student attainment and outcomes. ● Further, each and every school has an important history and legacy that is also special and meaningful to their community. Factoring in history and legacy to determine which schools should be parish primary schools and which schools should close would also be a difficult to fairly apply across all primary schools. ● A number of submissions cited the history of racial segregation as a reason not to close certain schools. Rather than allow historical wrongs and longstanding inequities be a barrier to the imperative to change education, because schools and the education system were built on a foundation of inequity, Bermuda's difficult history and the lasting legacy indicate that the system needs to be transformed. ● There is a however critical need to preserve and honour history and legacy. Some consultees have made suggestions on the potential renaming of parish primary schools.
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			<ul style="list-style-type: none"> ● Rather than the Ministry deciding how this would be achieved, the Ministry proposes to draw on the knowledge, experiences and memories of our school communities by inviting community members on the best ways to document, honour and celebrate critical aspects of Bermuda’s history. ● The consultation submissions and the strength of views on the importance of history and legacy were balanced with the strong imperatives to improve education, the longstanding inequities, the declining enrolment, and the failure to make the changes needed indicate the need for parish primary schools.
9.	Implementation	<ul style="list-style-type: none"> ● Somerset Primary’s property can be repurposed to serve the community. 	<ul style="list-style-type: none"> ● The Ministry agrees that the future uses of a building must be considered; this responsibility falls to the Ministry of Public Works, and future uses would be considered if needed depending on the decisions.
		<ul style="list-style-type: none"> ● Due to the history of segregation at Somerset Primary, name the parish school something completely different than West End and Somerset Primary. ● West End’s property can be used as a trade school for less academically inclined children ● It is urged that the Government does all it can to preserve the legacy of West End (by incorporating schools colors, including teachers and staff from West End at the new parish school, or naming the school after an educator or leader from West End. 	<ul style="list-style-type: none"> ● Depending on the decisions, the Ministry is interested in engaging the community regarding recommendations and suggestions for the possible naming and renaming of schools. ● There would be significant opportunities for community involvement in the implementation of any decisions; therefore, the recommendation of preserving the history and legacy of the West End Primary School would be considered.

PART IV – ANALYSIS OF ALTERNATIVE PROPOSALS

The merits of each proposed alternative were also carefully examined to determine if they considered and addressed the reasons why parish primary schools were being proposed and whether they related to the vision and objectives, or could meet the objectives of parish primary schools. The feasibility of alternatives was also considered.

Although many were comprehensive, most alternatives did not fully or partially take on the issues that needed to be resolved by the introduction of parish primary schools. For example, a number of alternatives focused on individual schools, and why a particular school should not close, which is understandable. However, these approaches did not also address the systemic issues and the vision and objectives of parish primary schools.

A summary of the alternatives proposed for parish primary schools and how they were considered are provided below. Some similar alternatives have been consolidated.

	Alternative	Summary of Consideration and Response for Each Alternative
1.	Select schools with the highest scores as parish primary schools	<ul style="list-style-type: none"> ● This would not achieve the vision and objectives, including achieving equity and accommodating up to 300 students and staff for each parish primary school. ● Parish primary schools need to be spread across Bermuda for demographic reasons, geography and to ensure that all children in a parish and zone can be accommodated in a parish primary school ● To make decisions only based on scores and without regard to the location of the schools and the demography of the parish and zone would mean that there would be no primary schools in Pembroke, Paget or Smith’s and 2 schools in close proximity to one another in St. George’s, Southampton and Sandys Parish.

2.	Close fewer schools; instead of parish schools, we can continue with the three zones - East, West, Central, closing the schools with lower enrolment.	<ul style="list-style-type: none"> ● The research conducted supports a maximum enrolment of up to 300 students. ● The current and projected enrolment supports the number of primary schools proposed. ● Closing fewer schools would mean: <ul style="list-style-type: none"> ○ Spreading precious human and financial resources across a higher number schools and undermine achieving the vision and objectives, including equity and accommodating up to 300 students and staff for each parish primary school ○ Less financial investment for each school and therefore a reduction in the ability to provide 21st century learning ○ Schools would not be the optimal size based on research and projected enrolment.
3.	Keep all St. George's Parish schools open	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools, nor does it achieve the goal of equity. ● The vision is to have inclusive and equitable schools for <u>ALL</u> learners and families. ● The St. George's Parish student population projections will fall below 200 students for all three schools; this data indicates there is no need to have three schools in St. Georges; the current student population averages roughly 253 for all three schools. In addition, the parish primary school will accommodate P7 and P8 years. ● Keeping all schools open in St. George's Parish does not support the parish primary school concept of one school per parish. ● The Government prefers not to invest in privately owned buildings when other buildings are available, and whereby the benefits of ownership can be enjoyed by the entire community. The vision is equity across the System for all schools and all students

4.	Keep 2 primary schools in St. George's, Southampton and Sandys	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools, nor would it achieve the goal of equity ● The birth rate and enrolment continues to decline; the population in these parishes does not support 2 schools each for these parishes.
5.	Don't close highest performing schools	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools for the benefit of all students, nor would it achieve the goal of equity across all primary schools for all students. ● "Highest performing" has not been defined ● The goal is to have all schools performing at a level that meets the needs of all children ● Equity in all schools is the aim.
6.	Close schools with low enrolment (except the schools in St. George's and Gilbert Institute) and limit costs of new buildings	<ul style="list-style-type: none"> ● This alternative would not achieve the vision or objectives for parish primary schools for the benefit of all students, nor would it achieve the goal of equity across all primary schools for all students. ● This alternative suggests a carve out for particular lower enrolment schools in a parish (St. George's Parish) with a low percentage of students for the number of primary schools and another better more appropriate site nearby, and a carve out for a school (Gilbert Institute) with another more appropriate site close by. ● In recent years, some small schools are at capacity and may have a low enrolment compared to other schools with more capacity ● This alternative limits the decision around enrolment only, and doesn't take into regard the vision and objectives for parish primary schools, or the need for equity across all primary schools. ● The current and projected population of St. George's Parish does not support having 3 primary schools.

7.	Keep St. George's Prep and St. David's Open and move East End to St. George's Preparatory School	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools as the vision is to have one primary school per parish. ● The vision is to have inclusive and equitable schools for <u>ALL</u> learners and families ● East End Primary School is the best and most appropriate site for the St. George's Parish Primary School ● The Government prefers not to invest in privately owned buildings when other buildings are available, and whereby the benefits of ownership can be enjoyed by the entire community ● The vision is equity across the system for all schools and all students. ● The current equity gaps must be removed so that all schools will have the necessary educational services and programs that students require ● The St. George's Parish student population projections will fall below 200 students for all three schools; this data indicates there is no need to have two schools in St. Georges; the current student population averages roughly 253 for all three schools. In addition, the parish primary school will accommodate P7 and P8 years.
8.	Keep St. David's Primary as the St. George's parish primary school	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools. ● St David's Primary School does not have the land area needed for the expansion capability and green space needed to align with the vision for a parish primary school.

9.	The Devonshire Primary School should be more centrally located in the parish, for example at the site of Elliot Primary School; The siting of the school at the western extreme of the parish makes little sense. If it is really going to be a parish school and the focus of the community, it should be more centrally located.	<ul style="list-style-type: none"> ● This would achieve the vision and objectives for parish primary schools. ● This would situate the parish primary school for Devonshire Parish farther away from Victor Scott Primary School and the border between the eastern and central zones. ● Using Elliot Primary School instead of a new Devonshire Primary School is a viable option as the land area at Elliot Primary School facilitates the vision for expanded capability and plenty of green space.
10.	Use Pembroke school instead of New Build in Devonshire	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools as the vision is to have one primary school per parish. ● This would put the school in Pembroke Parish and not in Devonshire Parish as the plan intends. ● A third school is not needed in Pembroke based on the current and projected enrolment. ● The remaining school in Pembroke, Northlands Primary School by virtue of its site cannot accommodate the vision and objectives for a parish primary school.
11.	Use Prospect instead of Elliot for the alternative school	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for the exceptionalities signature school. ● The Prospect Primary School site was proposed for another use, which is to accommodate DMBHA and KMCC.

12.	Refurbish Dame Marjorie Bean Hope Academy (DMBHA) for exceptional students and use Prospect for new Devonshire primary school	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for the exceptionalities signature school. ● The DMBHA building and site cannot meet the vision and objectives, cannot accommodate the expansion required, and is not large enough to accommodate the current number of students. ● The footprint of the site has remained the same since the school opened in 1985. ● Additional space is needed for the expansion of programmes and services as required by students with exceptionalities in a 21st learning environment and required by clients of the K. Margaret Carter Center. (KMCC).
13.	Consider Gilbert for the exceptionalities signature school	<ul style="list-style-type: none"> ● Prospect Primary School is the best most appropriate site for the exceptionalities signature school. ● The exceptionalities signature school must also be in close proximity to KEMH VII due to the medical needs of students and clients ● Additional space is needed for the expansion of programmes and services as required by students with exceptionalities in a 21st learning environment and the clients of KMCC.
14.	Use Gilbert Institute for the alternative signature school	<ul style="list-style-type: none"> ● Following consideration of alternative proposals, the site of KMCC has been determined as the best and most appropriate site and location for the alternative education signature school
15.	Heron Bay Primary School should be the Southampton parish school instead of Dalton E. Tucker Primary School	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools ● The size of the site is too small and limits the ability for programme expansion in alignment with the vision for a 21st century learning facility

16.	If a school in the West is to close, make it Somerset Primary instead of West End Primary	<ul style="list-style-type: none"> ● Somerset Primary School is the best most appropriate site for the parish primary school because it: <ul style="list-style-type: none"> ○ Is a larger site and has more expansion capability, whereas West End Primary does not as it is surrounded by residences and roads ○ Has a separate building for a preschool ○ Already has large separate parking and play areas for both the preschool and the primary school ○ Is close to Warren E. Simmons Field which can provide additional learning spaces which can support the delivery of the curriculum
17.	Introduce a charter ^x school or academy model ^{xi}	<ul style="list-style-type: none"> ● This would not achieve the vision or objectives for parish primary schools for the benefit of all students, nor would it achieve the goal of equity across all primary schools for all students ● Bermuda is small with limited resources for the charitable sector; it is unlikely that sufficient and sustained funds could be raised to provide enough funding to support parish primary schools as charter schools or academies in a sustainable way. ● It is also likely that these models would draw funds away from other non-profit needs, and reduce required social investment in other areas in Bermuda

18.	Run a pilot programme	<ul style="list-style-type: none">● This would:<ul style="list-style-type: none">○ Not achieve the vision and objectives○ Only serve a small number of students○ Not address the reasons why change is needed, including the need for equity, to address declining enrolment and accommodate the 2 additional years of primary school education○ Only impact a small number of students when there is an imperative and mandate for systemic change, and○ Would significantly delay the necessary changes for all students.
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Demonstration of a Proper Consultation Process

	Gunning Principles	Adherence to and Demonstration of Gunning Principles
i.	Consultation must take place when the decision is at a formative stage.	<p><u>Articulation that Consultation is on Proposals</u></p> <p>Consultation materials and activities articulated and emphasized that consultation is on proposals, that the Minister is open to alternative proposals, and that no decisions have been made, as follows:</p> <ul style="list-style-type: none"> • Articulated in consultation document • Articulated in consultation meeting presentation (by moderator and presenters) • Articulated and reiterated in responses to consultation questions <p>The messaging was consistent that that no decisions have been made and that the Minister is open to proposals.</p>
ii.	Those being consulted must be given enough information to allow them the ability to give intelligent and reasoned responses.	<p><u>Invitation to Participate</u></p> <p>Persons were invited to participate in the consultation by:</p> <ul style="list-style-type: none"> • Written letters of invitation • Ministerial statement • Press conference • Press releases • Advertisements supported by an advertising campaign • Social media • Government WhatsApp account

		<p><u>Opportunities to Participate</u></p> <ul style="list-style-type: none">• Persons were given opportunities to participate in the consultation by:• Reading the Proposal for the Introduction of Parish Primary Schools Consultation Document and the• Executive Summary of the Proposal for the Introduction of Parish Primary Schools Consultation Document• Attending stakeholder, public and parish meetings• Submitting a Parish Primary School Consultation Form• Emailing consultation submissions via email to consultation@moed.bm. <p><u>Staff and Close Critical Stakeholders</u></p> <ul style="list-style-type: none">• Consultation meetings for staff and close critical stakeholders were held that included:<ul style="list-style-type: none">○ The Board of Education, Ministry of Education and Department of Education○ The St. George’s Preparatory Board of Governors.Principals, preschool administrators and other system leaders○ The BPSU, BUT and BIU Officers <p><u>Responsiveness to Questions</u></p> <p>Persons were invited to ask questions at:</p> <ul style="list-style-type: none">• Consultation meetings, online at Facebook, Menti.com, and• Via consultation@moed.bm
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iii.	There must be sufficient time to allow those responses to be given.	<p><u>Consultation Period and Deadline</u></p> <ul style="list-style-type: none"> • The consultation period ran for 3 months from December 18th, 2020 to March 12th, 2021. • Documentation and presentations articulated the consultation deadline. • There was a significant advertising a push leading up to the deadline to solicit consultation responses before the end of the consultation period.
iv.	The results of the consultation must be considered in the making of the final decision.	<p><u>Submission and Data Collection</u></p> <p>For the Minister’s consideration, the Ministry collected all consultation questions and responses by the following means:</p> <ul style="list-style-type: none"> • Completed Parish Primary School Consultation Forms • Comments and questions at meetings (verbal and in writing via electronic chat, comments and messaging application functions) • Questions and comments via consultation@moed.bm <p><u>Consultation Analysis and Decision-Making</u></p> <ul style="list-style-type: none"> • The Minister read, reviewed, considered and analyzed each consultation submission • An analysis was conducted, which was provided to the Minister to inform his decision-making.

Endnotes

ⁱ (Ontario, 2020)

ⁱⁱ (Bertolini, 2012))

ⁱⁱⁱ Parish Primary School Consultation document; Annex IV; pages 78-81.

^{iv} (Ofsted, 2019)

^v Ibid.

^{vi} (Bernews, 2019)

^{vii} (Lagan, 2021)

^{viii} (Bertolini, 2012)

^{ix} Parish Primary School Consultation document; Annex IV; pages 78-81.

^x Established in the U.S., charter schools are publicly-funded and independently run schools, although they may solicit and receive additional funds from private or community interests. Legislation and rules vary from state to state. Generally, they do not abide by the same rules and regulations as traditional public schools. For example, they have the flexibility to determine school hours, curriculum and hiring and firing. However, they are bound by accountability requirements.

^{xi} ^{xi} Established in England, academies are publicly funded and independently run schools. They are run by academy trusts, which are not-for-profit companies. They may solicit and receive additional funds from private or community interests. Academy trusts have the flexibility to determine term times and hire and fire staff. They do not have to follow the National Curriculum, but must have a broad and balanced curriculum.

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