

Andy Smith

From: Enquiries National
Sent: Monday, 8 March 2021 4:25 p.m.
To: [REDACTED]
Subject: OIA Response - 1248509
Attachments: OIA 1248509 [REDACTED] Appendix A.pdf

Tēnā koe [REDACTED]

Thank you for your email of 13 January 2021 to the Ministry of Education requesting the following information:

1. A copy of the Ministry of Education license/agreement which allows Crimson Global Academy to teach online courses to overseas students. A report in the New Zealand Herald said this was granted in May 2020.

<https://www.nzherald.co.nz/business/the-two-other-secret-lawsuits-against-education-firm-crimson/WW7257QIB55CC3GSJ4OCWSOJ4/>

2. A copy of the application documents involved with registering as a school with the Ministry which were submitted by Crimson Global Academy.

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

We have identified 20 documents within scope of your request. Please find these attached along with the decision on their release, as Appendix A. Where information has been withheld from these documents it has been made under section 9(2)(a) of the Act, to protect the privacy of natural persons.

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

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

Nāku noa, nā

Enquiries National Team | Ministry of Education | TW
33 Bowen St, Wellington

education.govt.nz | [Follow us on Twitter: @EducationGovtNZ](https://twitter.com/EducationGovtNZ)

We get the job done *Ka oti i a mātou ngā mahi*
We are respectful, we listen, we learn *He rōpū manaaki, he rōpū whakarongo, he rōpū ako mātou*
We back ourselves and others to win *Ka manawanui ki a mātou, me ētahi ake kia wikitoria*
We work together for maximum impact *Ka mahi ngātahi mā te tuinga nui tonu*

Great results are our bottom line *Ko ngā huanga tino pai ā mātou whāinga mutunga*



Appendix A

Doc #	Date	Document Title	Decision on release
1	1 Apr 19	Email: RE: Private school application	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p> <p>Additional information has been removed as outside the scope of the request.</p>
2	2 Apr 19	Email: RE: Application for registration of private school	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
3	3 Apr 19	Email: RE: Meeting	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
4	3 Apr 19	Email: Re: Meeting	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
5	23 Apr 19	Email: On-line high school application	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
6	23 Apr 19	Email: Crimson Online Academy - update	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
7	1 May 19	Email: Crimson Online Academy curriculum review	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
8	13 May 19	Email: RE: Meet	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
9	21 May 19	Email: Re: Site visit	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p>
10	5 Jun 19	Email: Re: Health and Safety Online Resources.docx	<p>Release in part.</p> <p>Information has been withheld under section 9(2)(a) of the Act.</p> <p>Please note the attachment from this document is contained in document 15.</p>

Doc #	Date	Document Title	Decision on release
11	19 Jun 19	Email: FW: 2019 BWOFF - 25-27 Crowhurst Street, Newmarket	Release in part. Information has been withheld under section 9(2)(a) of the Act. Please note the attachment from this document is contained in document 15.
12	21 Jun 19	Email: Re: Child safety policy	Release in part. Information has been withheld under section 9(2)(a) of the Act. Additional information has been removed as outside the scope of the request.
13	10 Jul 19	Email: Re: Child safety policy	Release in part. Information has been withheld under section 9(2)(a) of the Act. Please note the attachment from this document is contained in document 15.
14	11 Jul 19	Email: Re: Child protection policy etc	Release in part. Information has been withheld under section 9(2)(a) of the Act.
15	11 Jul 19	Memo: Private School Provisional Registration - Crimson Online Academy	Release in part. Information has been withheld under section 9(2)(a) of the Act.
16	15 Jul 19	Email: Oranga Tamariki	Release in part. Information has been withheld under section 9(2)(a) of the Act.
17	30 Jul 19	Email: Crowhurst St	Release in part. Information has been withheld under section 9(2)(a) of the Act.
18	6 Aug 19	Email: Progress	Release in part. Information has been withheld under section 9(2)(a) of the Act.
19	23 Aug 19	Letter: Provisional Registration - Crimson Online Academy	Release in full.
20	??	Media Request	Release in full.

Ken White

From: Ken White
Sent: Monday, 1 April 2019 10:45 a.m.
To: John Morris
Subject: RE: Private school application

Hi John

Perfect. See you at 3.00pm tomorrow.

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [mailto:john.morris@morrisconsulting.co.nz]
Sent: Monday, 1 April 2019 10:33 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: RE: Private school application

Hi Ken

Thanks for your prompt response.

I can do tomorrow afternoon at 3pm if that suits you.

Regards

John

John Morris MA (Hons) ONZM | Morris Consulting
s 9(2)(a)
M: s 9(2)(a) | DDI: s 9(2)(a)
E: john.morris@morrisconsulting.co.nz

From: Ken White [mailto:Ken.White@education.govt.nz]
Sent: Monday, April 1, 2019 9:31 AM
To: John Morris
Subject: RE: Private school application

Hi John

Out of Scope [redacted] Can do any time before 11.00am tomorrow or after 1.30pm tomorrow?

Regards

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [mailto:john.morris@morrisconsulting.co.nz]
Sent: Monday, 1 April 2019 9:20 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Private school application

Dear Ken

I am hoping to meet briefly with you today or tomorrow to drop in an application for a private on-line high school on behalf of Crimson Education.

Would it be possible to call into the Ministry offices either this afternoon around 3.30pm or tomorrow morning around 11.30am for a brief explanation of the application?

Thank you for considering this.

Regards

John Morris

John Morris MA (Hons) ONZM | Morris Consulting

s 9(2)(a)

M: s 9(2)(a) | DDI: s 9(2)(a)

E: john.morris@morrisconsulting.co.nz

Released under the Official Information Act 1982

Ken White

From: Ken White
Sent: Tuesday, 2 April 2019 8:35 a.m.
To: John Morris
Subject: RE: Application for registration of private school

Hi John

Thank you for your email and application for the Crimson Online Academy. This email acknowledges receipt of your application.

Looking forward to meeting this afternoon.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile **s 9(2)(a)**

From: John Morris [mailto:john.morris@morrisonconsulting.co.nz]
Sent: Tuesday, 2 April 2019 7:54 a.m.
To: Ken White <Ken.White@education.govt.nz>; Ben O'Meara <Ben.O'Meara@education.govt.nz>; Pauline Cleaver <Pauline.Cleaver@education.govt.nz>
Cc: jacinda.ardern@parliament.govt.nz; 'j.beaton@crimsoneducation.org' <j.beaton@crimsoneducation.org>; 'd.freed@crimsoneducation.org' <d.freed@crimsoneducation.org>; Janine Manning (j.manning@crimsoneducation.org) <j.manning@crimsoneducation.org>
Subject: Application for registration of private school

Dear Ken

Thank you for agreeing to meet this afternoon to discuss the proposed Crimson Online Academy.

Please find attached the draft application for the Crimson Online Academy. Enclosed also is a covering letter explaining more about the venture – an online high school run by Crimson Education that will use a combination of world-class teaching talent and new-age technological tools to provide a superior education for New Zealand students.

As mentioned in the covering letter, Crimson's leadership is typically globally dispersed but has assembled this week in Auckland for business meetings and would appreciate the opportunity to meet with you at a time convenient to the Ministry for an in-person meeting to further explain their ideas and cover off any queries the Ministry may have about the application.

Hopefully, it will be possible to find a time that suits you for such a meeting when we meet this afternoon.

Thank you for your consideration of this application.

Regards
 John Morris
 Special Adviser to Crimson Online Academy

John Morris MA (Hons) ONZM | Morris Consulting
s 9(2)(a)

M s 9(2)(a) | DDI: s 9(2)(a)
E: john.morris@morrisconsulting.co.nz

Released under the Official Information Act 1982

To the Secretary of Education:

At Crimson Education, we are excited to jointly submit the enclosed application for a private school in New Zealand. We understand that our proposal – for the country's first online high school – does not follow conventional regulatory frameworks, and have done our best to follow the existing application guidelines where possible. Added at the end of our application are a number of appendices to give as much information as possible on this venture.

Throughout the application, we've sought to clarify our mission, our personnel, and what inspired us to submit this to the Ministry. The idea for the Crimson Online Academy came directly from conversations that we have had with our students; from their commentary, we felt that there was a significant untapped demand for a high-quality school that could be accessed from anywhere – broadening the set of students who could possibly study there. In our work at Crimson Education, an online-only supplementary education and academic strategy provider, we have worked with thousands of students around the world online and believe that the coming generations are not only open to the concept, but poised to thrive in it. On the back of this feedback, a member of our Board, Janine Manning, had a meeting with Prime Minister Jacinda Ardern in London. Jacinda was extremely supportive of the idea, asking to be cc'd on the submission of Crimson's application to the Ministry surrounding the effort.

We understand that the application may not answer all the questions you have about our proposal. Crimson's leadership team – including the three authors of the report – is scattered around the world, but are all in Auckland over the next two weeks and would love to meet in person to clarify the outstanding questions. Our team travels quite extensively, and we would love to take advantage of this opportunity to connect and clear up any ambiguities or issues with our report.

Lastly, for our proposal there were a couple areas stated on the physical school application where we did not know if they applied to us. The sections regarding maps of the physical building and certificates for regulatory clearance have thus been left as Pending – we do have plans to use preexisting Crimson physical spaces for testing activities and can contact our landlords and collate those documents if those would be helpful in processing the application. Please simply contact us in the event you would like these to be provided.

Thank you for your consideration.

Sincerely,

Jamie Beaton
CEO, Crimson Education
j.beaton@crimsoneducation.org

David Freed
VP, Operations + Finance, Crimson Education
d.freed@crimsoneducation.org

John Morris
Special Advisor
john.morris@morrisconsulting.co.nz

APPLICATION FOR PRIVATE SCHOOL REGISTRATION
CRIMSON ONLINE ACADEMY

March 28, 2019

Released under the Official Information Act 1982

Preamble

To the Secretary of Education:

The following constitutes Crimson Online Academy's application to become an accredited private high school per the regulations of the Ministry of Education. The high school that we are proposing to found in this document is a predominantly online high school, meaning that in many sections the application questions are applicable only partially or not at all.

Before getting into the application, we want to note that this application is the result of discussions with many of the students of Crimson Education, the education consulting company we work for. Our program is intended to help students maximize their learning outcomes at each point in their respective journeys, and we've had incredible success globally using a completely online education method to obtain the best results for our students. Our students get into top US and UK colleges at rates more than four times the global averages, and our success rates stack up favorably against any other college advising company operating globally. Our courses across all standard curricula (NCEA, CIE, IB, SAT, AP) have produced not only exemplary outcomes but meaningful differences in the results for every student that we worked with.

Our belief is that online education is an equalizing factor that takes the biggest education constraint - location - out of the picture and levels the playing field from students from around the world. We have worked with 20,000 students from over 30 countries and have received endorsements from leading education minds like Larry Summers (former president of Harvard University) and Bror Saxberg (the Chief Learning Officer of Kaplan University) for our innovative methods to guiding and training students.

Our immersive candidacy-building programs pair standard academic tutoring with extracurricular mentoring that helps students develop crucial skills like communication, leadership, and presentation. There are two core elements that underpin everything that we do with our students. The first is the belief that online education is the only forum through which we can regularly and reliably connect students to the best international talent. We have nearly 3,000 current or former students from top-20 global universities in our network that our students work with on their academic or extracurricular projects, and we have scoured the world to find our academic consultants, who reside in nearly 15 different countries.

The second belief is that online education leverages technology to create unique advantages for students. We have spent years developing a proprietary learning management system that facilitates everything we do with students. Images for this can be seen in Appendix A, which shows how we've created distinct advantages for our students through technology. Included in this are a number of distinct data science projects: from the personality matching algorithm (developed by former eHarmony Chief Scientist Galen Buckwalter) we use to ensure optimal matches between students and teachers to the school selection algorithm we use to provide rigorous recommendations around course selection and university applications. Our company is

extremely dedicated to marrying traditional approaches with new-age data science to create learning advantages for our students, and our pedagogy is constantly revised to take new research into account.

It is through these discussions with students that we have developed our conviction around the need for a full online high school in New Zealand. Many of our most successful students (see the case studies expressed in Appendix B) had profiles very suited to the online high school, and we believe that this offering will hit a serious soft spot for students that are looking for high schools that both support their personal learning style and offer the ability for them to learn as quickly as they'd like, instead of being constrained by the group learning style offered in most physical high schools.

Ultimately, we also believe with an online high school we can replicate the advantages we've created in our current programs at scale. We can offer students access to the best international teachers without charging the exorbitant fees of overseas colleges, which will maximize our student's learning outcomes and level the international playing field. We expect that in our online school our technologists and dedicated curriculum team will be able to quickly iterate to create superior curricula and learning methods that will constantly be fine-tuned to best suit our student's needs.

COA's mission, stated formally in Appendix C, is to broaden international access to high-quality education through technology, ensuring that each student that leaves our school has the belief to accomplish their goals and the tools to do it. This is a mission echoed through every level of the organization - from the world-class educators that we have put on the Board to the CEO of Crimson's business, Jamie Beaton, who is pursuing a PhD at Oxford University specifically dedicated to the online schooling space. Jamie, who already has a Masters of Education from Stanford, has quickly established himself as a thought leader in the education space and this project will borrow from his extensive research into online schooling to generate a sustainable, best-in-class education institution.

In the following sections, we have done our best to answer the questions as completely as possible, adding as much supplementary context to the discussions as possible to flesh out our ideas. The concepts we have sketched out are new and innovative within the New Zealand regulatory framework, but borrow heavily from both successful models we have studied abroad and our work with international education thought leaders. We feel confident there is ample precedent for our proposals and are eager to work with the Ministry to demonstrate how our virtual school would translate from concept to execution.

To the last point, in any area in which this application is not sufficiently heavy on detail or clear on precise details, we urge the Ministry to contact us directly to clarify any expectations. We are more than happy to speak to the Ministry about our idea and would love to reach an aligned understanding of our goals as soon as possible to work hand-in-hand on this process. We have

included as much information as possible on our school for transparency (see our mission statement / values in Appendix C), knowing this is a unique idea we have proposed.

Our full contact information has been left below. We very much appreciate the consideration given to this application and look forward to engaging further with the Ministry on this registration topics.

Sincerely,

Jamie Beaton
CEO, Crimson Education
j.beaton@crimsoneducation.org

David Freed
VP, Operations + Finance, Crimson Education
d.freed@crimsoneducation.org

John Morris
Special Advisor
john.morris@morrisconsulting.co.nz

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Application Components

Full Name of the Proposed School

Crimson Online Academy

Proposed Physical and Postal Address of the School

As the Crimson Online Academy (onwards, “COA”) will be a fully functioning online high school (onwards, “OHS”), it will not have a physical campus where classes are administered. Instead, COA will teach its students exclusively through online courses that are taught on Crimson’s proprietary learning management system.

COA does see the value of having physical campuses where students are able to interact for academic and extracurricular reasons, however. It proposes to use the following two campuses below for separate reasons. COA has already had discussions with external registration agencies about adding internationally accredited curricula to its academic system, and they have stressed the importance of in-person testing centres for their primary exams. The first centre below (in Parnell) will thus predominantly be used for academic exercises, and can be a means to ensure academic honesty on important course evaluations - a prominent concern within online education.

The second physical presence will be the 30+ tuition centres that Crimson currently owns and operates across New Zealand, which are going to be used for extracurricular purposes. COA understands that some students may want access to tutors and in-person help with their studies. These centres, therefore, will be a location where students may go in order to take their online classes surrounded by their peers and receive in-person instructional hours from selected tutors trained in the academic curricula that they are studying. While these centres are indeed the home of operations for another tutoring business during selected hours of the day, COA has worked with the owners in order to ensure that it can reserve the spaces for parts of each week for instruction for its students. The centres will have sufficient computer workstations to accommodate COA students, and the tutors will be provided by COA as a resource for the students.

From this point forward, for brevity, the first centre will be referred to as “The Parnell centre” and the second set of centres will be referred to as “The Newmarket centres”. For the second centre, a single address for the head centre is listed below. The full list of centres includes the set of EduExperts centres and Numberworks centres that can be found at these links ([EduExperts](#), [Numberworks](#)).

The Parnell centre

Physical + Mailing Address

Level 3

125 St. Georges Bay Road

Parnell, Auckland 1052

The Newmarket centre

Physical Address

402 Broadway

Newmarket, Auckland 1023

Mailing Address

PO Box 9450

Newmarket, Auckland 1149

Telephone, Fax, and E-mail of the Proposed School

The following items correspond to The Parnell centre, which will be the primary point of contact for COA.

- **Telephone:** +64 9-303-0086
- **Fax:** Not applicable
- **Email:** info@crimsoneducation.org

Description of the School

COA will eventually be a secondary school for students in Years 9 - 13. In its initial years, COA anticipates that it will focus on students in Years 11, 12, and 13 but it will aim to expand to the full high school years within two years of opening. The reason for the initial trial period is to establish proof of concept for COA's innovative pedagogical methods and ensure smooth operational execution of the online classroom medium.

Proposed Date of Opening

The date of opening of COA is conditional on regulatory approval and the conclusion of hiring processes for educational roles within the school (see below). COA anticipates that it will open its doors to begin enrolling students on February 18, 2020. We have spoken to a number of

existing Crimson students about this project, asked them whether they'd be willing to move to a school of this caliber and received very positive feedback. This prospective student list demonstrates a real market interest for these services. Consequently, we are keen to open as soon as possible and are working hard on all fronts to have our institution ready - should we secure approval - for a start at the beginning of the 2020 school year.

Definition of School Type

The COA will initially be a secondary school that serves students in Years 11, 12, and 13. Eventually, it will serve students from Year 9 through Year 13.

Managing / Controlling Body

COA is a subsidiary of Crimson Consulting LLC (henceforth, "Crimson"), but its day-to-day management is largely supervised by two groups - the Board of Directors and the key management team. The management team has a significant degree of autonomy in adjusting COA policies to best suit the needs of faculty and students, and Crimson is represented only through the Board of Directors, which focuses on key strategic priorities for COA.

- Curriculum creation strategy
- School mission and values
- International outreach strategy and promotion
- Tuition policies (including all relevant financial aid experience)
- School budgets and allocation of funds

Appendices D and E show the composition of the Board and the leadership structure of the school. The former is a combination of key administrative staff, representatives from Crimson (Jamie Beaton, David Freed, etc.), and a number of educational advisors who signed on in pursuit of COA's international mission (Bror Saxberg, Larry Summers, etc.). Saxberg and Summers' prior work will be used to drive the creation of an innovative pedagogical curriculum and open academic environment, respectfully.

The leadership team of the school is structured around having a trio of primary decision-makers (the Principal, the Learning Director, and the Operations Director). While the Principal will be 'first-among-equals' of the three - enlisted with breaking ties as necessary and charting strategic school decisions - all three will work together to solve all of the school's major decisions. The Principal is a CEO-type role (primarily charting strategy), the Learning Director is in charge of all

the academic decisions that are made in the school¹, and the Operations Director will be in charge of all the administrative day-to-day work required in order to keep the school consistently running at 100%.

Manager Contact Information

The school will be ultimately managed by the controlling body of Crimson Consulting LLC, and the primary operators will be representatives Sharndre Kushor and David Freed. Their name, email, and phone numbers has been reproduced below. Their addresses would be the address of the Parnell centre above.

Sharndre Kushor

Telephone: s 9(2)(a)

Email: s.kushor@crimsoneducation.org

David Freed

Telephone: s 9(2)(a)

Email: d.freed@crimsoneducation.org

'Fit and Proper' Template

The 'Fit and Proper' template has been signed by the relevant parties. Since COA will be a subsidiary of Crimson Consulting LLC, the 'Fit and Proper' document was signed by Sharndre Kushor on behalf of the directors of that company (Jamie Beaton, Sharndre Kushor, Janine Manning, and Jason Lenga). See Appendix F.

Local and Health Authority Approvals

As an online school, COA is leasing spaces for both the Parnell centre and the Newmarket centre. In both cases, COA has sought to procure all the required documentation from the

¹ Including, but not limited to, curriculum and course development, student scheduling, and working to ensure that each student is receiving an excellent, personalized education. This person will also be responsible for facilitating and maintaining the quality of the beyond-the-classroom experiences that are key to COA (internship and research opportunities, extracurricular academic opportunities, clubs, etc.). Lastly, the Learning Director will also be tasked with working with students on college preparation, which COA intend to be a core part of the student experience from Year 9 onward.

existing owners of the buildings and is awaiting the documents. It will attach these documents to the application as a supplement and send over when they arrive.

Prospective Students

COA has a number of Crimson students who would be interested in potentially enrolling were COA to open its doors by the 2020 school year. Based on interest, COA believes that it could enroll around 20-40 students per year for its first two years shortly after launching, and would attempt to grow the 2021 graduating class by doing comprehensive outreach to the existing NZ homeschool community.

Overall, COA would aim to have an application-based enrollment policy that will be open to all students in the country who wish to apply. The School Selection policy has been included as Appendix G of this document. Per that policy, COA will not be discriminating on the basis of gender, race, sexual orientation, disability, etc. when admitting students to its school. Consequently, COA anticipates that its initial admitted classes (of students slated to graduate in the 2020 and 2021 school years) will be diverse in all relevant respects.

COA's setup will most likely initially be conducive to students that are currently home schooled; however, COA anticipates that over time it will be enrolling students who spent their first year or two at physical high schools across New Zealand.

Description of Buildings / Proposed Site

See the "Proposed Physical and Postal Address of the School" section for a description of both The Parnell centre and The Newmarket centre.

Annotated versions of the floor plans for these buildings will be included in the supplement to this document. On this, we will clearly indicate the boundaries, grassed and sealed areas, and access points. As mentioned earlier, these properties are not core parts of the COA plan and will not be essential aspects of our pedagogy (to the extent students are ever required to come in, it will be for their exams).

Documents from Local Body, Health, and Fire Authorities

As discussed above, COA has sought to produce this documentation from both The Parnell centre and The Newmarket centre from the existing owners of the properties. Those documents will be included as a supplement to this application.

List of Proposed Staff

COA staff are ready to get started. Crimson will leverage its existing tutoring operations to pull accredited teachers that will be able to immediately get started teaching students at the online high school. COA also has enlisted help with a number of other professionals who will be useful in furthering the mission of the institution.

- **Technology:** COA will be able to utilize the technology stack already built by Crimson in order to create the online classroom environment that will be used to house students. The existing Crimson technology team, which includes CTO Guy Sherman and a series of talented project managers and developers, will be leveraged to fully help with these efforts.
 - **Curriculum Developers:** Crimson has an extensive curriculum development team, led by Gabriel Gladstein, which has produced a number of exemplary proprietary curricula for not only admissions to top colleges but also for existing CIE and IB subject areas. These developers will be deployed to refit the existing curricula to an online high school setting, incorporating Crimson pedagogical lessons along the way.
 - **Child Safety Support:** Crimson has received acclaim for its existing child safety infrastructure and has partnerships with providers like Youthline and the Safeguarding Children Initiative with which it can create a state-of-the-art support system for all of its students
 - **Admissions Counseling:** One factor that will clearly distinguish COA from all other schools in NZ will be its counseling regarding global university and college admission systems. COA will utilize Crimson's network of counselors and mentors in order to provide superior admissions results for its students
-

Equipment

In the traditional sense, COA will use very little equipment. Part of COA's core educational mission is to distribute a high quality of education across the globe with minimal barriers. To that end, having curricula or lesson plans that require using materials that are not immediately accessible to all students (e.g. high-cost calculators, chemistry lab equipment, etc.) goes contrary to the requirement-light COA aims to provide its students.

The major equipment that COA will require of each student is a high-quality, functioning computer through which the student can consume all of the educational content COA provides and complete all of the required assessments. Reading materials for classes will all be provided through the learning management system, as will all assessments and textbooks used², such that students can accomplish the majority of assessments using very basic tools (e.g. standard calculators, pens & paper / basic word processors, etc.).

The learning management system (seen in more detail in Appendix A) will contain a variety of tools to help the student accomplish their learning objectives. Some of the existing tools already in the app that will be used with students:

- **Exam Prep:** COA will have a robust set of exam preparation tutorials for students across all standardized exams (SAT, ACT) required for university and the national / international examinations that they may take (NCEA, CIE) as part of their personalized curricula.
 - The exam prep platform has been customized to give students feedback on the areas of the exam they are deficient and suggest study paths based on results. This differentiates the product from self-graded examinations that do not offer insights into how students can study to better their grades
 - For COA, this program will be extended to cover all courses that they take. Crimson has developed proprietary curricula for past CIE and IB courses and will lean on those learnings, which contain practice question sets and exams, to give students ample problems to practice and master various key subject competencies
- **Roadmaps:** A core part of the COA experience will be the roadmaps that students work on with their guidance counselors, tutors, and mentors. Each student will be in charge of managing a three- to four-year vision for their education with the help of their support staff. This program - already included in Crimson's system - will emphasize student autonomy and their role as the steward of their educational journey
 - The roadmap will include information on all academic courses, extracurriculars, external deadlines (e.g. college applications), and important testing dates. It will interact with the student's classes to provide both a short-term checklist (tests, homework, etc.) and a long term vision of where the student is going
- **Communication:** Crimson's learning management system offers a robust messaging system allowing students to communicate with their full support staff within the learning environment. This facilitates collaboration, be it goal-setting on the roadmap, storing past academic and extracurricular information, or working through exam prep on the platform
 - COA anticipates using this same system for students to interact with all of their support staff at the institution. This will ensure that students are constantly working within the context of their learning system and putting all their progress in trackable formats, enabling support staff to monitor how the student is doing and solve problems before they occur

² Students will be able to purchase physical copies of these textbooks if they so wish for their individual learning, but this will not be required.

- **Classroom Integration:** Crimson has worked with external video providers to provide an online classroom functionality for its existing students, whose sessions with tutors are already taped. These sessions offer the ability for tutors to display their lessons concurrent to the video and for both parties to collaborate on notes for the session
 - Since being rolled out, these have produced exemplary results for students, whose understanding can be tracked by tutors via the public notes. These notes are stored in the app so the student can easily see them in parallel to the video.
 - The video tracking, which will be strongly encouraged but opt-out for students (out of respect to privacy concerns), has also given Crimson significantly better results and increased satisfaction scores from both tutors and students. COA anticipates that these same improvements will carry over into all 1:1 interaction and that its group classes may utilize many of the same technologies effectively.
-

Curriculum

The following section has been broken up according to the categories listed on the application.

Description of Programs, Courses, and Resources

COA intends to ideally offer a version of Cambridge International Education courses from inception to its students, integrated into an original curriculum per the below principles. COA strongly believes that students should be focused on knowledge accumulation rather than test preparation, and so it will bring in concepts from the NCEA and International Baccalaureate curricula as appropriate to refine the curricula to teach students what they will learn.

COA's approach to curriculum design is based on promoting the development of student competencies over the course of their time at COA. COA borrows from Kaplan University in seeking to promote two types of competencies within each class - program-specific competencies (PSCs) and school-specific competencies (SSCs).

The former are subsets of typical course goals, representing knowledge objectives within broader subject areas of mathematics, writing, history, etc. The second are a combination of big-picture academic skills that COA wants all of its students to master (oral communication, written presentation, critical thinking, problem solving, etc.) and career skills that COA thinks important to instill in its students (leadership, entrepreneurship, independent thinking, teamwork, etc.).

All curricula that students enroll in is created with an eye towards developing their competencies in these two subject areas over time. Student coursework is created with an eye on both horizontal and vertical integration. The latter applies primarily to PSCs - students advance along tracks within their core academic competency areas (history, science, mathematics, language) over the course of their four years at the institution based on how well they are absorbing the

competencies required of their age level. COA will not progress students at the rate they age; rather the flexible curriculum will move them up or down according to their progress to ensure that children are consistently being challenged in the classroom. The emphasis of the program is that students have a focus on competing against themselves and working to further their own education - COA believes in the academic research that shows that children need to have individualized attention in order to fully maximize their academic potential.

COA has had very positive discussions about these programs with Cambridge representatives and feels confident that if it can get Ministry approval, then it will be able to partner with the representatives in order to create such a curriculum that will also abide by Cambridge standards. When it initially enrolls students in grades 11, 12, and 13, COA anticipates the set of courses listed below. Note that this list is provisional and subject to change, but is intended to show the breadth of initial coursework COA is prepared to present.

Core Competency Area	Offered Courses (Cambridge #)
History	History (9389), Economics (9708), Global Perspectives and Research (9239)
Science	Computer Science (9608), Biology (9700), Chemistry (9701), Physics (9702)
Mathematics	Mathematics (9709), Mathematics - Further (9231)
Language	English Language (9093), English Literature (9695), General Paper (8021)
Foreign Language	Spanish (9719), French (9716), Chinese (9715)
Electives ³	Business (9609), Classical Studies (9274), Sociology (9699)

Time To Be Allocated to Subjects and Programs

The idea of horizontal integration refers to having consistency in reinforcing SSCs across different verticals. In each year at COA, students will be enrolled in classes in each of their core academic competency areas, along with a foreign language, and two elective courses. Elective courses will be built as adjacent areas to the core academic competency areas to ensure that students remain focused on learning the PSCs and SSCs that are required for them to gain a high-quality holistic education. In both these core classes and the electives they take, students will have opportunities to do projects which reinforce the SSCs that are important to COA's vision of student education.

³ Note that there will be additional electives that are not pulled from the CIE curriculum structured per the "Time To Be Allocated To Subjects and Programs" section.

These projects will include a number of initiatives focused on developing COA's student base into conscious and contributing global citizens. In line with the mission and values of the organization, COA students will be given supplementary courses on quarterly bases that are taken at their own speeds organized on having them address crucial societal issues. Some of these will address issues of implicit bias, as well as broaden horizons about global cultures and key social issues of the day. Others will focus on basic communication skills and how to interact with people from international cultures, preaching the benefits of tolerance, diversity, and global citizenship. COA hopes to develop students into lifetime learners with open minds, and these extracurricular courses will be one of many measures attuned to doing that.

The specific time allocated to each subject will be dependent on the student. COA is built around pushing students to continue improving at their own pace in each subject; the virtual system allows COA to have significantly more flexibility in advancing students through curricula at their pace. This means that students who are inclined towards mathematics will be offered opportunities to move through the curricula at a more rapid pace and progress towards higher levels - so long as they are accomplishing their goals according to time in other classes, they are free to spend as much time as they want pushing the envelope on their mathematics learning. The same would apply for any English learners: COA would provide every resource for them to improve their creative writing, poetry, or academic writing skills and spend an increased proportion of their time advancing quickly in those curricula.

Description of Teaching Approaches

COA is focused on creating a teaching system that emphasizes the autonomy of the student and provides the extent of the guidance that is required to push the student to maximize their learning outcomes. The teaching methods are intended to reflect this.

Students will primarily learn through group lectures for the classes they are a part of. The curriculum is structured such that all lectures will come with supplementary assignments that students will work through to accelerate their learning. Students who wish to move faster than the class will be able to by viewing historical lectures and then taking the competency exams on their own. Tutors will be provided through Crimson Education as an added resource for students to use to help accelerate their learning or solve remedial problems.

Teachers in the online courses will be working with students to go through the curricula live. Teachers will have discretion on how they want to teach the individual concepts within their classes to emphasize innovation and an entrepreneurial spirit to teaching that COA thinks is essential to getting high teacher engagement.

Teachers will then be responsible in post-session meetings to respond to individual student queries (measured through course-level Q&A forums that will be available to all groups of students taking the course; not the ones in any specific lecture group) and grading the minority of assessments which are not assessed automatically. Because COA anticipates using

technology to simplify grading for teachers, the expectation is that teachers are spending more time in office hours or providing individualized feedback based on a review of student progress (they will have access to progress reports similar to those dictated below).

To ensure rapid teacher development and quality control, COA will be using its proprietary learning management system to constantly be monitoring lessons. The curriculum development team mentioned in prior sections is part of a broader network of educators that will be utilized to form best-practice teaching recommendations and constantly review the recorded lectures and student-tutor interactions to make sure that at every touchpoint of the school, the student is receiving the best experience possible. Students, teachers, tutors will be submitting feedback after every interaction and the machine learning algorithms that Crimson already uses for its own staff will be leveraged to spot instances where quality is not up to standards. This will focus on identifying leading indicators of student disengagement and ensure that problems are spotlighted ahead of time. The following section details the progress reports that these leading indicators will feed into, giving all stakeholders in the student's life key insights into their performance levels.

Description of Assessment Methods

Per principles of competency-based education, these curricula will also be created to assess students based on their progress across these broad competency areas. The Learning Director of the school will be tasked with creating evaluative standards that ensure that children are consistently developing competencies at an above-average rate, and assesses students against their own benchmarks. As research shows, it is unfair to expect every kid to achieve the same goals every year and continuing to move the benchmarks in the same fashion will only serve to reduce students' investment in learning and their perceived value from the exercise. To keep motivation high, the assessments will be structured in a fashion that empowers every student to succeed.

The assessment structure from a grade standpoint will include the following components:

- **Participation:** Students will receive a participation grade for showing up to their classes. This will ensure that students are attending the classes they are being taught, which will drive engagement within the online school. There will be in-class questions that are automatically incorporated into the curricula to ensure that students are participating on a regular basis and paying attention to the online class.
 - As part of this, student attendance will be tracked through the online recording system that Crimson uses to stream the lessons. With parental consent, all tutoring sessions will also be recorded so that Crimson can use the data to iterate on successful learning methods and develop more effective curricula for teachers to work with students.
- **Out-of-Class Assessments:** As mentioned above, the curriculum assessments will be structured around the students demonstrating mastery of certain competencies. This will typically take the form of sequential projects and exams that will measure the student's progress in achieving key learning outcomes.

- **Final CIE Exams:** As the curriculum will be structured around the Cambridge International learning system, COA will incorporate the finalized assessments into the assessment systems for all students.

Student progress will be very visible to parents, counselors, and other teachers within the programs. The goal of COA is to have everyone aligned on the student's learning goals and providing a robust support network to ensure that they continue along the right path. Parents and counselors will get weekly progress reports on student progress. These progress reports will not only consist of session feedback reports from any 1:1 tutoring sessions, but also quantitative summaries of progress to the learning objectives mentioned above. Since assessments are outcome-based, it will be easy to show progression over time - as COA gets more data, it can quantify whether students are behind or ahead of schedule compared to a broader cohort and provide more distinct recommendations for where the student needs to spend more time to catch up to peers.

The progress reports will reflect COA's focus on striking the balance between allocating resources to accelerate top students and providing remedial services to struggling students. In their most successful areas, the progress reports will suggest on a quarterly basis ways that students can continue to expand their competencies at a higher rate, whether through enrolling in short supplementary courses (intended to provide short SSC reinforcement) or allocating more time to existing coursework.

Hours of Instruction

COA will not govern as strict of a timetable as a traditional school. As an online institution, students will have significantly more flexibility with their academic approach to suit their schedules and academic accommodations. All classes will be recorded - while students will not have the ability to ask questions if they do not attend the live class, they will be able to rewatch at their convenience. COA emphasizes student flexibility and accommodating a variety of learning methods through a pedagogical system that is outcome-, not process-, focused and will reward students based on their achievement of competency-based objectives over their conforming to traditional educational processes or assessment standards.

With an eye towards practical realities, however, COA's live classes will take place between the hours of 9 AM to 5 PM. Student schedules will be flexible depending on the quantity of classes they are taking and, as with every school, intermediate assessments and projects will largely spill over into other hours.

Attestation of Truth

We, the below signatories, attest that everything written in the above application reflects our material understanding of COA and is, to the fullest extent of our knowledge, true.

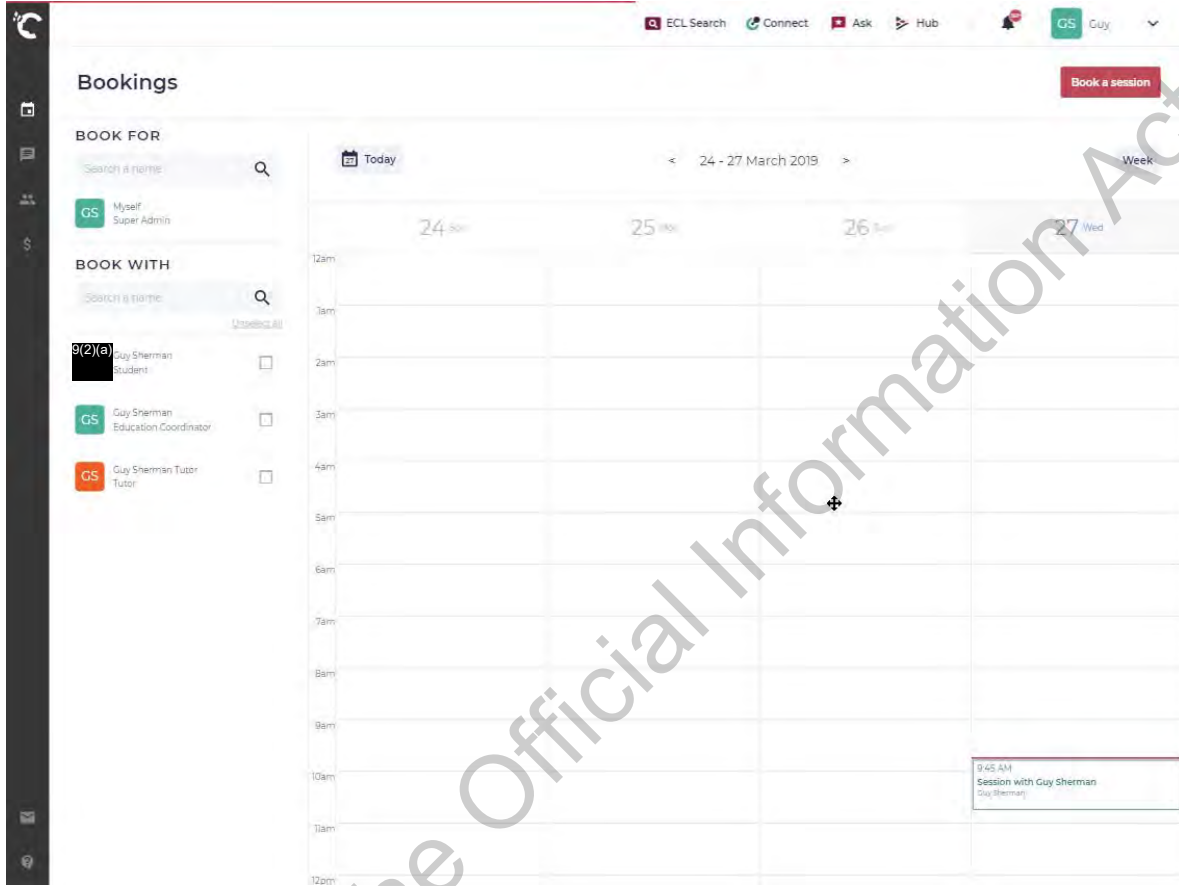
Jamie Beaton
CEO, Crimson Education

David Freed
VP, Finance & Operations, Crimson Education

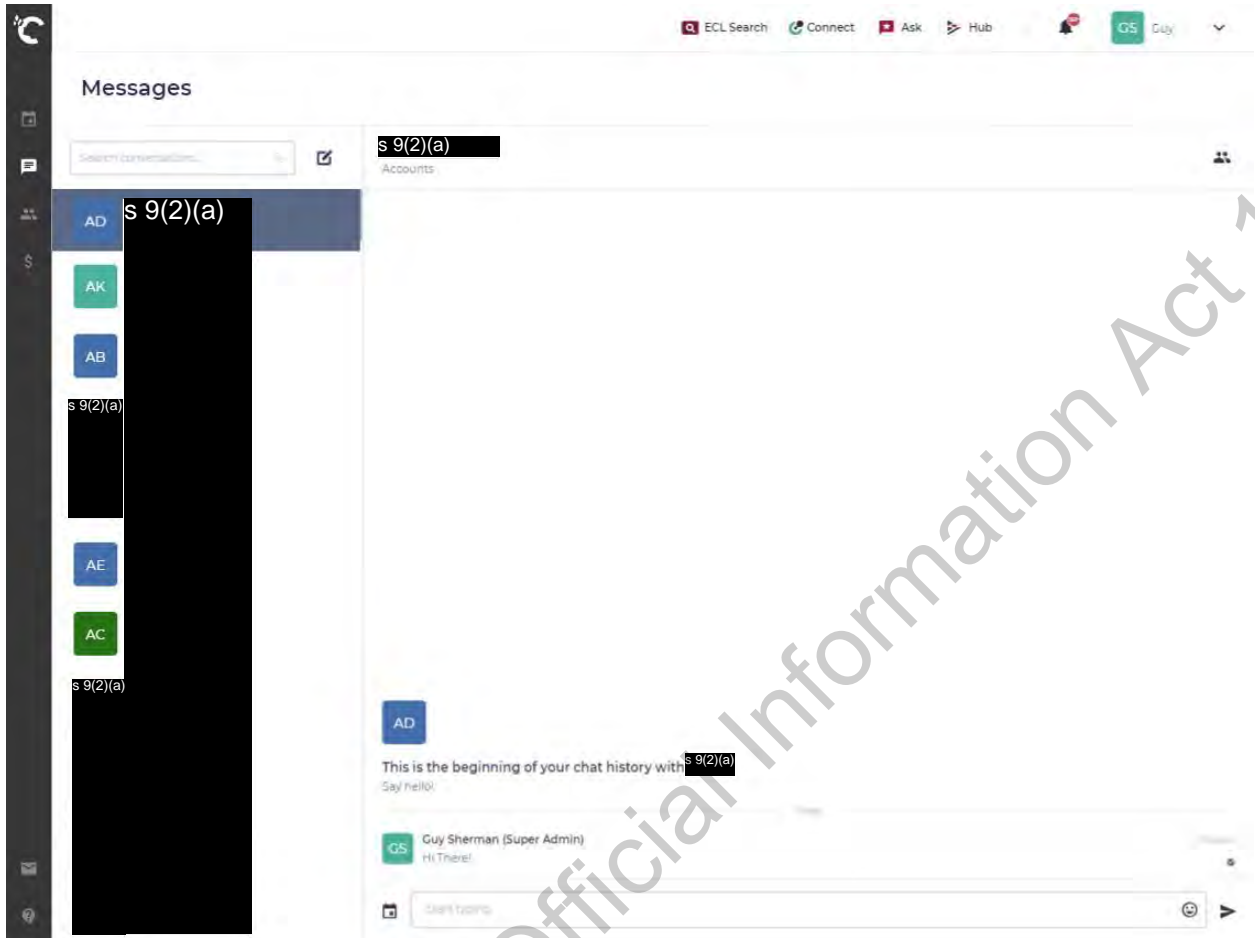
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Appendix A: Crimson App Photos

Images of the Key Crimson App features contained below.



Calendar feature for students to monitor classes, meetings, etc.



Integrated messaging system for all classmates, tutors, teachers, etc. Can be easily turned into a discussion board forum for specific classes (replacing conversations as class topics).

← Our People

John Smith

Profile Package Subjects ECL Roadmap Tasks Grades Test prep Applications Reports

BIO

Hi there!

My name is John and I am currently in year 10. I really enjoy playing sports, debating, and reading philosophy books in my spare time.

I would eventually like to study at either Harvard or Princeton, and major in either International Relations or Sociology!

ABOUT

STUDENT TYPE

Regular

CONTACT DETAILS

5:38pm (local time)

sales_student@crimsoneducation.io

KEY CONTACTS

Jane Smith (Primary contact)

s 9(2)(a)

janesmith@fakemail.com

English (Primary)

Italian

John Smith

UNIVERSITIES

+ Add a university

SCHOOLS

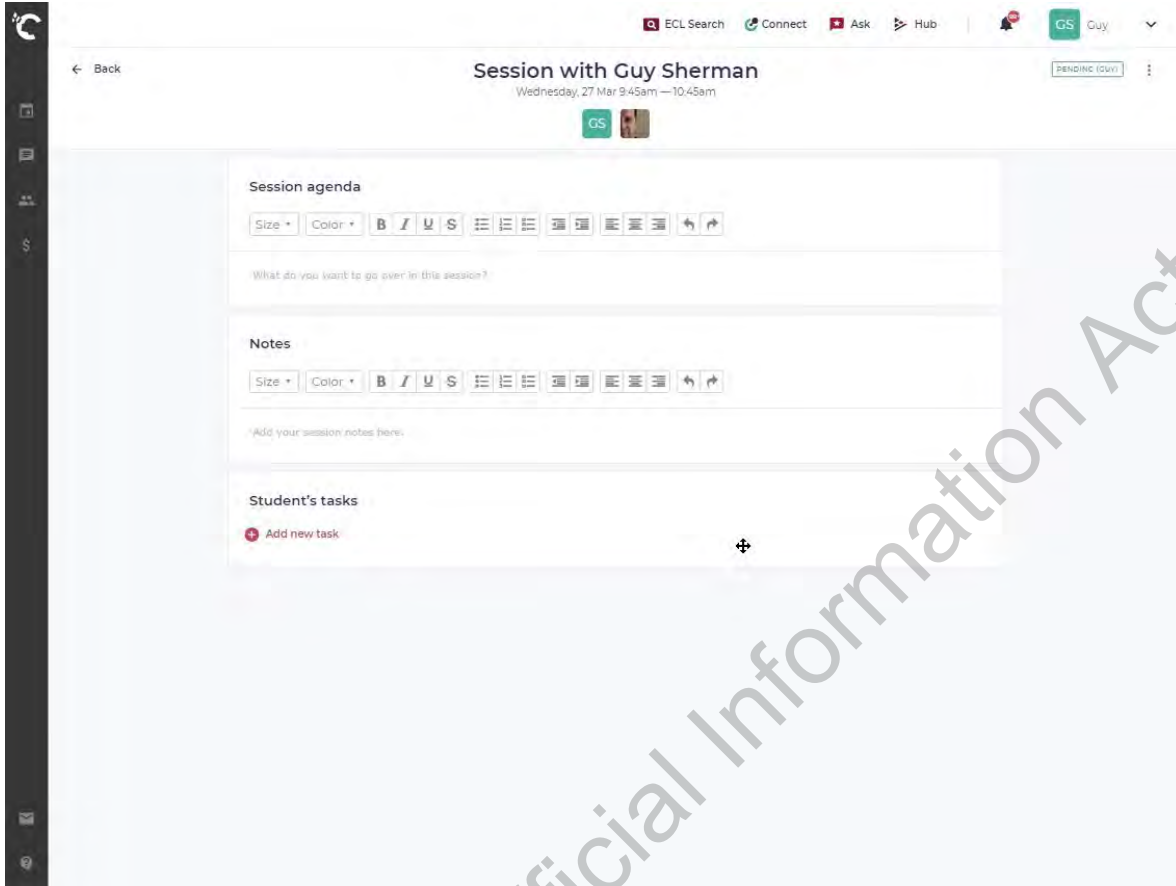
s 9(2)(a)

+ Add a school

Integrated student profiles. Will be viewable to parents, counselors, and teachers so that everyone has a 360-degree view of how the student is tracking against their goals.

The screenshot displays the 'Roadmap' feature for a user named John Smith. On the left, a sidebar lists navigation options: Bookings, Messages, Our People, Invoicing, Support, and Help Desk. The main content area is titled 'Our People' and 'John Smith', with tabs for Profile, Package, Subjects, ECL, Roadmap (selected), Tasks, Grades, Test prep, Applications, and Reports. The 'Roadmap' view shows a list of tasks on the left and a calendar view on the right. The tasks are grouped into projects, each with a color-coded header: green for 'Preparation/Exploration', red for 'UK Application', and red for 'UCAS Reference'. Each task includes a start date, duration in days, and a list of sub-tasks with their own deadlines. The calendar view shows these tasks as horizontal bars across a timeline from 2018 to 2019, with a 'Today' indicator and options to select, print, or delete.

Roadmap function that helps students keep track of all their individual deadlines amidst the larger, overhanging projects on their app. Can group by assignment and project for simplicity.



Integrated session bookings that store notes and generate video links directly. Students will be able to view their notes directly alongside recorded video of lessons to help them study.

Appendix B: Prior Crimson Success Stories

In the course of its normal business, Crimson has had a number of exemplary success stories around students that were full immersed in its comprehensive learning environment. These provide a template for the success that COA envisions having with its students.

§ 9(2)(a)

§ 9(2)(a) is a wonderful example of Crimson's educational program in practice. § 9(2)(a) and Crimson set out a strategy for his education in Year 10 that featured him utilizing hundreds of hours of tutoring as supplements to his existing coursework in order to allow him to take on a much higher volume of learning than he would be able to handle otherwise. Crimson paired this with significant extracurricular mentoring to ensure that § 9(2)(a) was applying his lessons outside of school and not just generating academic accolades at the expense of applying these lessons elsewhere.

§ 9(2)(a)

The results of combining Crimson's strategy with a deliberate execution plan on the tutoring front were tremendous. § 9(2)(a) was one of nine premier scholars in New Zealand for 2015, receiving the most outstanding scholarships in classical studies, English, geography, history, media studies and physics and scholarships in agriculture and horticulture, economics and statistics. He also obtained six A Levels doing the Cambridge International Exams, including topping the world in both English language and AS business studies. When it came time to college admissions, § 9(2)(a) was accepted into five of the eight Ivy League universities, Stanford, and Williams. He eventually chose to matriculate at Harvard.

§ 9(2)(a) story demonstrates the impact Crimson believes high-quality planning can have for a student. § 9(2)(a) and his strategist created detailed learning plans best suited to his style and execution on these helped him achieve extraordinary results.

§ 9(2)(a)

§ 9(2)(a) is one of the Crimson's primary success stories at its storied partner, the § 9(2)(a) girls' school. § 9(2)(a) was the Dux at § 9(2)(a) in 2016 and worked closely with her Crimson mentor to create a strong education portfolio tailored to her interests in design.

§ 9(2)(a)

§ 9(2)(a) story is one of strong planning and hard work to distinguish herself from peers. Knowing that she had an interest in design, § 9(2)(a) and her Crimson strategist researched the world's best schools in those areas and then created a plan that maximized her chances of admissions. Crimson focused on differentiating § 9(2)(a) application by helping her achieve exemplary results on her SAT, on her NCEA exams, and her AP exams. When it came time to apply to college,

Crimson had done work with § 9(2)(a) over a long period of time to prepare the design portfolio that eventually helped her secure admission into Carnegie Mellon and the Rhode Island School of Design, one of the world's best design programs that allowed her to cross enroll at Brown, one of America's best universities, to simultaneously develop her interests in the fine arts.

§ 9(2)(a) story is part of Crimson's efforts to help students from all backgrounds succeed regardless of their learning goals. It was through the strength of Crimson's network that § 9(2)(a) could find tutors that worked in her preferred areas who would mentor her to create an outstanding design portfolio. This is the same network that COA will lean on for all of its students so that no matter background or interest level, they can find world-class mentors that will help further their educations.

§ 9(2)(a)

As part of its operations, Crimson is a natural fit for a number of homeschooled students who are looking for Crimson to provide a driving hand not only for college counseling, but how to structure successful academic programs based on its prior experience with other students and the network of mentors that is globally unique.

§ 9(2)(a)

§ 9(2)(a) is one of Crimson's largest homeschooling success stories. Crimson was able to work with him for a number of years and essentially provided the structure that a standard school would to equip him with all of the tools that he needed in order to succeed. He was given tutors in every subject area that he desired and advanced much more quickly across his preferred educational tracks as a result. Crimson was very excited when § 9(2)(a) was admitted and enrolled in the law program at the University of Victoria.

§ 9(2)(a) story represents the impact that Crimson feels it can have with homeschooled students, many of whom are underserved by the current offerings. A structured, high-quality offering that leveraged international talent made meaningful changes in § 9(2)(a) life, and COA hopes to replicate that for all of its future students.

§ 9(2)(a)

Crimson Education worked extensively with § 9(2)(a), a former student at § 9(2)(a), to create a comprehensive tutoring program that would allow him to push ahead. Crimson suggested that § 9(2)(a) - an already advanced student academically - use tutoring to accelerate his growth and had him studying for his Year 13 exams in Year 12. Crimson worked with § 9(2)(a) to find tutors in areas that were not offered in his school so that he could advance quicker than his existing school infrastructure offered. The results were that § 9(2)(a) had the highest score across the entire country in his Cambridge exams, finishing with top scores in three A level subjects. § 9(2)(a) top score in the entire country on English Literature was duly impressive given that he immigrated to New

§ 9(2)(a)

Zealand in primary school without knowing the language. Crimson supplied [REDACTED] with multiple English tutors to help turn that weakness into a strength.

[REDACTED] is a great example of Crimson's belief that tutoring is just as apt for student who excel as those who struggle, and his success reflects a core COA principle that students should be able to study at their own pace. [REDACTED] ability to use tutors to vastly accelerate his learning timeline and take courses like Earth and Space Science would not have been successful within the constraints of his physical high school.

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Appendix C: COA Mission Statement & Values

Mission: The mission of the Crimson Online Academy is to broaden international access to high-quality education through technology, ensuring that each student that leaves our school has the belief to accomplish their goals, and the tools to do it.

Values: The Crimson Online Academy has eight key values that govern the setup of the school and its pedagogical methods:

- Education is the most powerful democratic and meritocratic force in the world - access to knowledge is a fundamental human right
- In-person education limits students to the quality of the best teacher in their area; online technology exposes students to the quality of the best teachers in the world - fundamentally, when education is borderless, potential is limitless
- All students have the ambition required to achieve their aspirations: the role of a school is to properly nurture and direct their passions, while providing them opportunities
- Schooling is as much a science as an art and schools must be constantly engineering their curricula and learning processes to give students the best education
- Technology-based learning methods are not a substitute, but a partner, to conventional approaches and the marriage of the two can generate deeply personalized education at scale
- Schools must embody the character traits they wish to instill in their students, none more than integrity and accountability
- Neither race, gender, ethnicity, nationality, wealth, nor location should be predictors of student achievement or limits on a student's ability to realize a world-class education
- Families are critical partners in their child's learning process, and work hand-in-hand with schools to ensure students are constantly supported and encouraged

Appendix D: Board Composition

Jamie Beaton, CEO of Crimson Consulting

Jamie Beaton's inspirational educational journey began in high school, when he became the first NZ graduate to be granted admission to each of the world's top 25 universities. He chose Harvard, graduating magna cum laude with a dual bachelor's and Master of Science degree in Applied Mathematics in just three years. He has since enrolled in Stanford's Graduate School of Business (he was one of its youngest admits at age 20) and will graduate with both a Master's of Business and Education in spring 2019. He was also awarded the 2018 Rhodes Scholarship to complete a postgraduate degree studying education at the University of Oxford, where he will graduate in 2021 while doing his postdoctorate thesis on the benefits of online education.

Jamie co-founded personalised education and mentoring company Crimson Education to give students the same opportunities, helping them break down information barriers to seize the best education and career opportunities, irrespective of location or financial standing. Crimson students receive guidance online across academics, university admissions, leadership and extracurriculars and career pathways from a hand-picked group of high-caliber tutors and mentors who are based at, or have graduated from, the world's top-ranked universities such as Harvard, MIT and Oxford.

Since its founding, Crimson has helped over 20,000 students - in its consulting service alone, it has helped students received nearly 150 Ivy League offers and 50 to Oxford/Cambridge, while awarding nearly \$50M USD in scholarship funding and financial aid. Jamie was inspired to create COA to help increase continue to help students worldwide in a more direct fashion, addressing some of the barriers he saw as he went around the world promoting Crimson internationally.

Larry Summers, former president of Harvard University

Larry Summers has an illustrious background as a public servant and educator. A former U.S. Secretary of the Treasury, Director of the White House National Economic Council, and Chief Economist of the World Bank, Larry is most recognized for his time as the President of Harvard University.

Larry's five years as President of Harvard represented a time of major innovation for the University. He focused on equality of opportunity and removing all financial obligation from students with family incomes below \$60,000 a year. He launched a major effort to make Boston, and Cambridge in particular, the global leader in life sciences research, with the formation of major programs for stem cell research and genomics. Perhaps most importantly, he led efforts to renew Harvard College with dramatic increases in study abroad programs, faculty-student contact, and collaboration across the University during his tenure.

Larry is the President Emeritus and the Charles W. Eliot University Professor at Harvard University, where he became a full professor at age 28, one of the youngest in history. He directs the University's Mossavar-Rahmani centre for Business and Government. He previously

won the John Bates Clark Medal recognizing the world's top under-40 economist and has published more than 150 papers in scholarly journals.

Larry formally serves as an advisor for both Crimson Consulting and COA, where he lends his considerable expertise on the global educational system and all relevant academic matters. He provides direct input to help shape COA's mission statement and values that dictate the organization's broader strategy.

Bror Saxberg, Former Chief Learning Officer at Kaplan University

Bror Saxberg is currently a VP of Learning Science at the Chan-Zuckerberg Initiative, working to apply learning science across the full educational ecosystem. Previously, Bror served as Chief Learning Officer for Kaplan, Inc., a leading global provider of educational services including post-secondary education, test preparation, professional education, English-language training, university preparation, and K12 offerings. There, he was responsible for the research and development of innovative learning strategies, technologies, and products across Kaplan's full range of educational services offerings. He is the co-author of "Breakthrough Leadership in the Digital Age" (2014) with Frederick M. Hess and his articles have been published in a host of academic, educational, and scientific journals.

Before working at Kaplan, Bror previously served as Senior Vice President and Chief Learning Officer at K12, Inc., where he designed both online and offline learning environments and developing new student products and services. Bror holds a B.A. in Mathematics and B.S. in Electrical Engineering from the University of Washington, both received in 1980. As a Rhodes Scholar, he received a M.A. in Mathematics from Oxford University, and also received his Ph.D. in Electrical Engineering and Computer Science from MIT in 1989 and a M.D. from Harvard Medical School in 1990.

John Morris, former headmaster of Auckland Grammar School

John Morris is a former headmaster of Auckland Grammar School, one of the six largest schools in New Zealand and one of its more distinguished academic institutions. John was headmaster of AGS for almost 20 years, from 1993 to 2012. During his time as principal, enrollment grew to nearly 2,500 students and the teaching staff to 150 - he was a visionary in curriculum as well, moving the organization away from the local NCEA system to Cambridge International Education classes because of the impact he believed it could have on his students.

John is the founding Chairman of the Association of Cambridge schools in New Zealand, and continued to promote the curriculum across the country. Prior to serving as principal for Auckland Grammar, John was the principal of Takapuna Grammar for four years. John graduated The University of Auckland in 1972 with an MA of History and obtained a degree from the Auckland College of Education one year later. He is a direct advisor to COA, and is an experienced sounding board for the administrative staff as they develop the curriculum to be used with students.

Keisuke Shibata, CEO of Oak Tree Holdings

A graduate of Georgetown University, Keisuke has successfully managed two schools in New Zealand since 2003. Keisuke was the Managing Director of Auckland International College (a leading IB World School in New Zealand), where he was in charge of strategizing for university admissions.

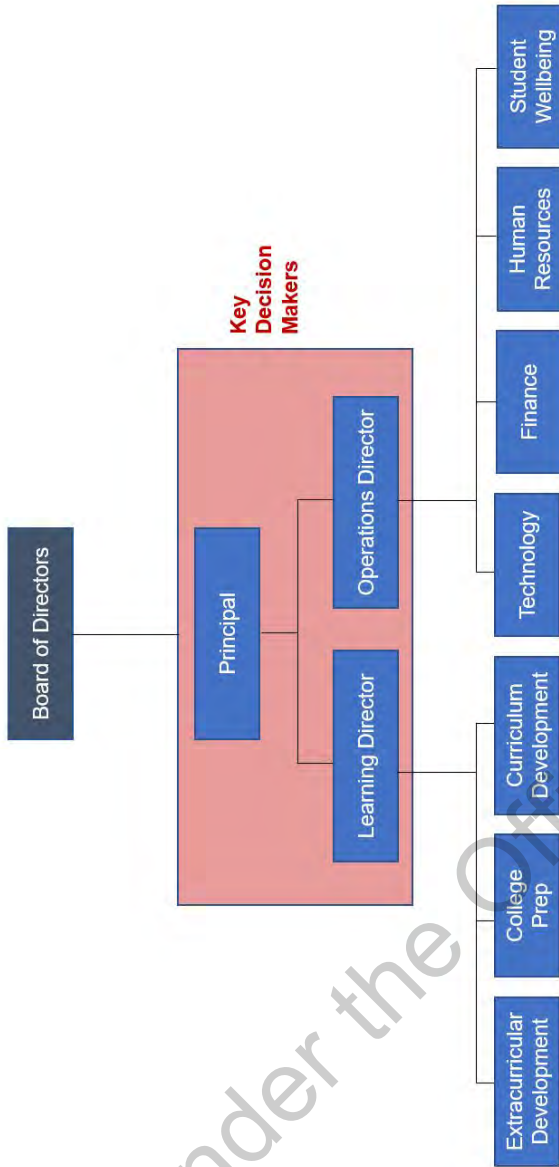
Keisuke served AIC for 12 years, helping take the school from its early days and establishing its status as a 'pathway to the world'. As AIC's reputation grew both onshore and offshore, many talented students flooded to the school in pursuit of education leading to the world's top universities. Under his leadership, AIC went from beginnings to maturity and the roll increased more than fourfold. As Managing Director, he led a gold standard university admissions team to help students navigate a complicated university application process and gain offers from top universities. Under his guidance, 90+% of the graduating class every year received offers from the world's top 50 universities - many graduates to top 10 US and UK universities. Prior to his appointment at AIC, Keisuke worked under two other educational institutions, one of which was his alma mater, Georgetown University.

With extensive experience in the educational industry from management, marketing, project development and university guidance, Keisuke took his post-AIC career and established his own educational service firm in response to a soaring demand for international schools, Oak Tree Holdings (aka Oak Tree Education) to develop international schools worldwide. Keisuke believes in the power of education in creating a better world for this generation and the next. He is dedicated to inspiring young minds to grow as future leaders, and to achieving equality in access to education in as many geographical locations as possible.

David Freed, VP, Finance+Operations at Crimson Consulting

David Freed graduated Harvard University 2016, where he completed his undergraduate and Masters' degrees in Applied Mathematics/Economics in four years. He graduated magna cum laude and Phi Beta Kappa with the highest honors for his major. His thesis was given the two top prizes in undergraduate research (including best thesis in the social sciences) and nominated for publication. Post-graduation, he worked briefly in finance before joining Crimson, where he leads its Service Delivery department and oversees the development of its curricula for all of its tutoring subjects. David was previously one of the youngest acceptances to Harvard Law School, received the offer at 20 but deferring attendance to pursue his goal of helping students with education at Crimson.

Appendix E: Leadership Structure of COA



Appendix F: Statutory Declaration Form

Appendix 1

Ministry of Education

Statutory declaration form

To accompany applications for provisional registration as a private school

(First Schedule, Oaths and Declarations Act 1957)

I, Sharndrē Kushor of s 9(2)(a)

(insert name)

(insert address)

Auckland, New Zealand

being the applicant for Crimson Online Academy

(insert name of private school)

I understand that the following information is required for the purpose of enabling the Ministry of Education to determine whether the directors or members of the trust board, including the applicant, are suitable to be involved in the management of the private school. This information is required pursuant to sections 35A to 35R of the Education Act covering, in particular section 35C (g) "has managers who are fit and proper persons (as described in section 35G) to be managers of a private school". I understand that I must complete this application on behalf of myself and each member that is involved in the management of the private school. Where I have answered in the affirmative to any question, I have attached all the relevant details in relation to the matter.

I SOLEMNLY DECLARE THAT TO THE BEST OF MY KNOWLEDGE:

I AND EACH PERSON WHO IS A DIRECTOR OR MEMBER OF THE TRUST BOARD AND WHO IS INVOLVED IN THE MANAGEMENT OF THE PRIVATE SCHOOL:

- (a) (have) (do not have) any convictions for a serious criminal activity
- (b) (have) (do not have) any health problems that may affect my ability to comply with my obligations towards the school and its students
- (c) (have had) (have not had) any adjudication of bankruptcy under the Insolvency Act 2006 or the Insolvency Act 1967 or any prohibition issued under any enactment on acting as a company director under any of sections 382, 383, 385, and 386A of the Companies Act 1993:
- (d) (have had) (have not had) any previous cancellation of the registration of a school of which I was a manager
- (e) any serious breach of my statutory duties as manager of a school registered under Section 35A of the Education Act
- (f) any conviction for an offence under section 35R
- (g) (am aware of) (am not aware of) any other matter that the Secretary should be aware of in respect of this application for a licence.

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declarations Act 1957.

.....
(Signature of applicant)

Declared at Auckland this 26 day of March 2019

before JB

(Justice of the Peace or other person authorized to receive a statutory declaration)

John Patrick Bowler
Solicitor
Auckland

Appendix G: COA Selection Policy

Broadly, COA wants intellectually curious children who are passionate about education and taking advantage of the tremendous opportunities available through our online portal. Our class sizes are limited to allow our teachers to be maximally effective and so we are limited on an annual basis by the reach of our staff and our technology. We are committed to giving each child a thorough, personalized education track and will be monitoring the size of our school to ensure that we do not enroll more students than we can ably serve.

Consequently, COA aims to put together a student composite that will create a dynamic school environment that maximizes the student learning experience. As an online school, we have the ability to pull from students all over the world, and value the diversity of experience that we can bring to the table.

Application Description

In line with this mission, students are evaluated on two distinct areas: Academic Fit and Quality of Personal Match. For the former, COA has a high educational benchmark and seeks to maximize the quality of discussion by admitting students that satisfy its high educational standards. For the latter, COA seeks to better understand the students that it admits to create diverse classes of ambitious students who will take full advantage of the available opportunities.

In order to properly assess students on Academic Fit, families which are applying to COA will submit the following documents to the school:

- Benchmark personal information (address, country of origin, gender, etc.)
- A transcript of their grades in their existing institution for the last 24 months (as well as any classes taken over the summer or in supplementary learning services)
- Two short personalized essays on topics intended to show personal attitudes towards learning, knowledge, and diversity of thought
- Two teacher recommendations
- For high schools students, a list of current extracurriculars

For the Personal Match section, Crimson has already started work to try and figure out which students are best suited to online work. Jamie Beaton and Galen Buckwalter have already begun to run tests on personality traits within the existing student base that correlate to better learning outcomes through online schooling, and have created a personality trait exam that can aptly measure how well suited students are for the experience. In its existing business, Crimson uses this personality test to help students find their best matches among tutors and mentors but for COA, this will also be used to ensure that students enrolling in the school are good fits for the environment. Crimson will use this information to have candid conversations with applicants about whether the school is best suited to their goals, intending to work with students to find the best education for them.

Incorporation of Personal Background in Application Assessment

Consistent with peer online high schools, COA is committed to a nondiscriminatory enrollment policy. Its statement on the matter is drawn from peers and can be seen in full below.

Crimson Online Academy will not discriminate in admissions on the bases of race, color, national or ethnic origin, sex, age, disability, religion, sexual orientation, and gender identity. All students admitted to Crimson Online Academy will be eligible to receive all the rights, privileges, programs, and activities generally accorded or made available to students at the Academy and the same criteria used in determining admissions will be used when assessing the grants of any additional opportunities, merit achievements, or privileges within the context of the existing learning institution.

Further, as expressed above, Crimson Online Academy will - to the best of its ability - not incorporate a family's need in its assessment of the student's candidacy. In line with its mission statement, Crimson Online Academy is committed to promoting education across the globe without concern for student financial background.

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Wednesday, 3 April 2019 7:44 a.m.
To: Ken White
Subject: RE: Meeting

OK. Thanks Ken. I will let Jamie know and confirm with you.

Regards

John

From: Ken White [mailto:Ken.White@education.govt.nz]
Sent: Wednesday, April 3, 2019 7:36 AM
To: John Morris
Subject: RE: Meeting

Hi John

I can do 2.30pm tomorrow if that suits. I'll see if Rachael Laurenson, Education Manager, is available. If not we should just proceed.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [mailto:john.morris@morrisconsulting.co.nz]
Sent: Wednesday, 3 April 2019 7:17 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Meeting

Hi Ken

Thanks for seeing me yesterday. I appreciated your openness regarding the project and application.

Regarding meeting with Jamie Beaton and David Freed, both of them leave on Saturday for overseas and they are desperate to meet you before they go. Is there any chance you could find a spare 30 minutes to see them sometime/anytime this week? They will come anytime that suits you.

Thanks for your consideration.

Regards

John

Regards

John

John Morris MA (Hons) ONZM | Morris Consulting

9(2)(a)

M: 9(2)(a) | DDI:9(2)(a)

E: john.morris@morrisconsulting.co.nz

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Wednesday, 3 April 2019 3:25 p.m.
To: Ken White
Subject: Re: Meeting

All confirmed Ken. Thanks for your help.
 Regards
 John

John Morris | Morris Consulting
 Cell: s 9(2)(a)
 E:John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 3/04/2019, at 7:36 AM, Ken White <Ken.White@education.govt.nz> wrote:

Hi John

I can do 2.30pm tomorrow if that suits. I'll see if Rachael Laurenson, Education Manager, is available. If not we should just proceed.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [<mailto:john.morris@morrisconsulting.co.nz>]
Sent: Wednesday, 3 April 2019 7:17 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Meeting

Hi Ken

Thanks for seeing me yesterday. I appreciated your openness regarding the project and application.

Regarding meeting with Jamie Beaton and David Freed, both of them leave on Saturday for overseas and they are desperate to meet you before they go. Is there any chance you could find a spare 30 minutes to see them sometime/anytime this week? They will come anytime that suits you.

Thanks for your consideration.

John Morris MA (Hons) ONZM | Morris Consulting

s 9(2)(a)

M: s 9(2)(a) DDI: s 9(2)(a)

E: john.morris@morrisconsulting.co.nz

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Tuesday, 23 April 2019 12:08 p.m.
To: Ken White
Subject: On-line high school application

Hi Ken

Thanks so much for agreeing to meet Jamie and David from Crimson re this proposal to register a private school.

This is just a follow-up to see how things are progressing. You probably gathered from meeting Jamie that he is very keen to get the approval asap so he can start getting things sorted to open next year.

I have tried to explain that there is a process that takes some time but I would appreciate your feedback so that I can forward to Jamie and David.

Thanks for your help Ken. I really appreciate it.

Regards
John

John Morris | Morris Consulting
Cell: s 9(2)(a)
E:John.morris@morrisconsulting.co.nz

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Ken White

From: Ken White
Sent: Tuesday, 23 April 2019 1:17 p.m.
To: John Morris
Subject: Crimson Online Academy - update

Hi John

Thank you for your email.

I have been working through the application and have sought some advice from Wellington around two areas, property and staffing. I think the property one we can easily work through but the staffing area could be a bit more problematic.

Property: The Education Act requires the premises to be fit for purpose for the type of school and number of students at it. If the students are studying online, the school will not need the same facilities as if they were studying face to face. You have indicated that you will have two centres in Auckland. I think if we can get sign off that they are fit for purpose, safety checks completed then we will be satisfied that you have buildings that are fit for purpose.

Staffing: My reading of the application, (correct me if I am wrong) is you will be using your pool of current accredited tutors. In order to teach at a NZ school, state or private, teachers have to be registered to teach by the Teaching Council. The Act states that in order to be registered, the applicant must meet the character requirements and be satisfactorily trained to teach. From our meeting I think you indicated that in the longer term you intended to recruit NZ teachers, which wouldn't be an issue but overseas tutors would have to be registered with the Teaching Council. It would be good if I could get your thoughts on this.

Happy to meet if you wish.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile 9(2)(a)
 12-18 Normanby Road, Auckland

education.govt.nz

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Tara Doak

From: Julie Spedding
Sent: Wednesday, 1 May 2019 7:14 PM
To: Ken White; Venus Rangi
Subject: Crimson Online Academy curriculum review

Kia ora,

I could not find the earlier email to respond to but I have a hard copy of the application for registration

The Education team cannot see any reason for not proceeding with the application for provisional registration, in terms of curriculum review.

Kind regards,
Julie

Julie Spedding | Senior Education Adviser | Central
DDI +64 9 632 9498 | Mobile 9(2)(a) [REDACTED]
12-18 Normanby Road, Auckland

education.govt.nz

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Ken White

From: Ken White
Sent: Monday, 13 May 2019 8:17 a.m.
To: John Morris
Subject: RE: Meet

Hi John

How about 11.00am?

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [mailto:john.morris@morrisconsulting.co.nz]
Sent: Sunday, 12 May 2019 8:52 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Meet

Hi Ken

Can you spare half an hour on Wednesday 22 May?

I have a list of some registered teachers from Crimson for you and also would like to discuss how things are progressing.

You name the time and I will be there.

Thanks ken

Cheers

John

John Morris | Morris Consulting
Cell: s 9(2)(a)
E: John.morris@morrisconsulting.co.nz

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Tuesday, 21 May 2019 8:09 a.m.
To: Ken White
Subject: Re: Site visit

Thanks Ken.
 Cheers
 John

From: Ken White <Ken.White@education.govt.nz>
Date: Tuesday, 21 May 2019 at 7:52 AM
To: John Morris <john.morris@morrisconsulting.co.nz>
Subject: RE: Site visit

Hi John

Liona Blair from our Property team will be doing the property check. I'm just tagging along!

Fine for Numberworks first.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [mailto:john.morris@morrisconsulting.co.nz]
Sent: Tuesday, 21 May 2019 7:14 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Re: Site visit

Ken
 Can we meet at Numberworks first at 2pm and then move on to EduExperts?
 Will you be bringing anyone else? Jamie is overseas but his co-founder Sharndre will be joining us for the visits.
 Regards
 John

John Morris | Morris Consulting
 Cell: 9(2)(a)
 E: John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 20/05/2019, at 11:34 AM, Ken White <Ken.White@education.govt.nz> wrote:

Hi John

Just a reminder, you were going to send through the site addresses for Wednesday's visit.

Regards

Ken

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile 9(2)(a) [REDACTED]
12-18 Normanby Road, Auckland

education.govt.nz

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<image001.png>

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Wednesday, 5 June 2019 11:50 a.m.
To: Ken White
Subject: Re: Health and Safety Online Resources.docx

Thanks Ken. I will liaise with Jamie at Crimson and see what we can work out.
Will get back to you ASAP.
Cheers
John

John Morris | Morris Consulting
Cell: s 9(2)(a)
E: John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 5/06/2019, at 11:35 AM, Ken White <Ken.White@education.govt.nz> wrote:

Good morning John,

Last time we met you will recall I mentioned a recent legislation change has added a new registration criterion for private schools, requiring them to be physically and emotionally safe places for students.

I am going to need to get some more information from you on how Crimson will address this area. I have attached an information sheet that might give you a steer and there are some good resources. A lot of it won't be relevant to an online school but hopefully it can serve as a guide.

Happy to discuss.

Ken

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile: 9(2)(a)

<Health and Safety Online Resources.docx>

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Wednesday, 19 June 2019 1:38 p.m.
To: Liona Blair
Cc: Ken White
Subject: FW: 2019 BWOF - 25-27 Crowhurst Street, Newmarket
Attachments: 2019 BWof to be issued 25 Crowhurst St18062019.pdf

Hi Liona
 I have just received this from EduExperts.
 Please let me know if this suffices or if there is more information still required.
 Thanks for your help.
 Regards
 John

John Morris | Morris Consulting
 Cell: s 9(2)(a) [REDACTED]
 E:John.morris@morrisconsulting.co.nz

From: Jenny Jin <j.jin@crimsoneducation.org>
Date: Tuesday, 18 June 2019 at 11:56 PM
To: John Morris <john.morris@morrisconsulting.co.nz>, "Jamie org" <j.beaton@crimsoneducation.org>
Subject: Fwd: 2019 BWOF - 25-27 Crowhurst Street, Newmarket

Hi John,

Please see the forwarding email for your reference. They're replacing a brand new elevator for the building and the work will be finished by this month.

Kind Regards
 Jenny

Sent from my iPhone

Begin forwarded message:

From: John Wang <john@jwfire.co.nz>
Date: 18 June 2019 at 10:46:29 PM NZST
To: j.jin@crimsoneducation.org
Cc: mike@jwfire.co.nz
Subject: 2019 BWOF - 25-27 Crowhurst Street, Newmarket

Hi Jenny,

Attached 2019 BWOF issued for you only as per your urgent request. The final BWOF certificate will be issue later as few items on the compliance schedule still to be finalised i.e. passenger lift.

Should you have any queries regarding this BWOF please do not hesitate to contact me.

Kind regards
 John Wang

JW Fire Ltd

11 Pukemiro St, Onehunga

Auckland 1061

PH: 09 6220032 M: 027 6270901

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Friday, 21 June 2019 11:49 a.m.
To: Ken White
Subject: Re: Child Safety Policy

Out of Scope

John

John Morris | Morris Consulting
 Cell: s 9(2)(a)
 E: John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 21/06/2019, at 11:21 AM, Ken White <Ken.White@education.govt.nz> wrote:

Hi John

I can do Monday at 1.00pm. Tuesday I am in a meeting for most of the day.

Ken

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile s 9(2)(a)

From: John Morris [<mailto:john.morris@morrisconsulting.co.nz>]
Sent: Friday, 21 June 2019 10:32 a.m.
To: Ken White <Ken.White@education.govt.nz>
Cc: Jamie org <j.beaton@crimsoneducation.org>
Subject: Re: Child Safety Policy

Hi Ken

This is a lot of material needed and I wonder if we could meet to chat this through.
 The best day for me is Monday 1-2.30 or Tuesday between 2-4pm.
 Can you make any of these times?

Cheers

John

From: Ken White <Ken.White@education.govt.nz>
Date: Friday, 21 June 2019 at 9:03 AM
To: John Morris <john.morris@morrisconsulting.co.nz>
Subject: FW: Child Safety Policy

Good morning John,

Thank you for providing the additional information on child safety and sorry for taking a while to get back to you.

The information provided was good however we need a little bit more information as detailed below.

- A list of practices has been provided – what we need is the list of policies Crimson has (e.g. similar to NEGs and NAGs in a state school)
- Supervision for tutors/mentors etc. to ensure online conversations are suitable (to ensure safety of online grooming of students)
- Police vetting of staff
- There is nothing that relates to the NZ culture in the documentation provided – we are looking at our cultural context for NZ students
- How are the children supporting theirs and others health and safety – what online modules are they doing to support this?
- Health and safety needs to be included in unit plans that teachers write or identified in lesson/units

Happy to discuss if need be.

Regards

Ken White | Senior Advisor | Schooling Network
DDI +64 9 632 9470 | Mobile 9(2)(a)

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Wednesday, 10 July 2019 9:38 a.m.
To: Ken White
Subject: Re: Child safety policy

Ken

The Parnell centre is the Admin HQ and all correspondence is directed there. Shandre is largely based there so is the best person to address to but to cover all bases it might be a good idea to send me a copy at the address below. I can then forward to wherever Jamie is likely to be. Hope this suits you.

Regards
 John

John Morris | Morris Consulting

s 9(2)(a)

Cell: s 9(2)(a)

E: John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 10/07/2019, at 9:24 AM, Ken White <Ken.White@education.govt.nz> wrote:

Hi John

Do you have a postal address we can mail correspondence to? Also do we address correspondence to Shandre?

The application talks about using the Parnell Centre for correspondence but that centre is no longer applicable.

Regards

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile s 9(2)(a)

From: John Morris [<mailto:john.morris@morrisconsulting.co.nz>]

Sent: Tuesday, 9 July 2019 10:47 a.m.

To: Ken White <Ken.White@education.govt.nz>

Subject: Child safety policy

Hi Ken

I have been liaising with Jamie Beaton and his team regarding this policy. I attach the revised version which I hope covers all the concerns listed in your email to me. I think it is extremely comprehensive and hopefully it will provide the final details to enable the MoE to register Crimson Online Academy as a private school in NZ.

Thanks for all your help Ken. I am happy to pop in to discuss things at any time.
Regards
John

John Morris | Morris Consulting
Cell: s 9(2)(a)
E:John.morris@morrisconsulting.co.nz

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Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Thursday, 11 July 2019 12:46 p.m.
To: Ken White
Subject: Re: Child protection policy etc

Ok. Thanks Ken. I will do that this afternoon.
 John

John Morris | Morris Consulting
 Cell s 9(2)(a)
 E: John.morris@morrisconsulting.co.nz

Sent from my iPhone

On 11/07/2019, at 10:18 AM, Ken White <Ken.White@education.govt.nz> wrote:

Hi John,

Just been going through the policy with Julie. Just two things.

The document references Child, Youth and Family in some places. The Act and service is now under Oranga Tamariki. [Oranga Tamariki Act 1989 No 24 \(as at 08 September 2018\), Public Act Contents – New Zealand Legislation](#)

Also the Children's Act 2014 [Children's Act requirements | Oranga Tamariki—Ministry for Children](#) should be referenced covering core and non-core workers.

I think a short email back acknowledging these areas should suffice.

Ken White | Senior Advisor | Schooling Network
 DDI +64 9 632 9470 | Mobile 9(2)(a)

From: John Morris [<mailto:john.morris@morrisconsulting.co.nz>]
Sent: Tuesday, 9 July 2019 10:47 a.m.
To: Ken White <Ken.White@education.govt.nz>
Subject: Child safety policy

Hi Ken

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 I attach the revised version which I hope covers all the concerns listed in your email to me.
 I think it is extremely comprehensive and hopefully it will provide the final details to enable the MoE to register Crimson Online Academy as a private school in NZ.
 Thanks for all your help Ken. I am happy to pop in to discuss things at any time.
 Regards
 John

John Morris | Morris Consulting
Cell: s 9(2)(a) [REDACTED]
E: John.morris@morrisconsulting.co.nz

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MEMO

To: Isabel Evans – Director of Education
From: Ken White – Senior Advisor, Network Planning
Cc: Janet Schofield – Network Planning Manager
Date: 11 July 2019
Subject: Private School Provisional Registration – Crimson Online Academy.

Purpose

This memo seeks your approval for the provisional registration of Crimson Online Academy as a secondary (Year 9-15) co-educational, private school.

Delegation

You have delegated authority to approve this application as noted in the Statutory Education Powers Policy. This document can be viewed on Te Tāhuhu: [Statutory Education Powers Policy](#).

Legislation

This application for provisional registration is related to [Section 35A](#) of the Education Act, 1989.

Background

We have received an application from Crimson Education to establish an online private school, Crimson Online Academy (COA).

Crimson Education describes itself as an online only, supplementary education and academic strategy provider, working with thousands of students around the world online.

Their programme is intended to help students maximize their learning outcomes at each point in their respective journeys. They operate globally using a completely online education method to obtain the best results for students. The application states their students get into top US and UK colleges at rates more than four times the global averages, and their success rates stack up favourably against any other 'college advising company' operating globally. They provide courses across all standard curricula (NCEA, CIE, IB, SAT, AP) and advise they have produced not only exemplary outcomes but meaningful differences in the results for every student they worked with.

Their belief is that online education is the only forum through which they can regularly and reliably connect students to the best international talent. They have nearly 3,000 current or former students from top-20 global universities in their network that their students work with on their academic or extracurricular projects, and their academic consultants reside in nearly 15 different countries.

The mission statement for Crimson Online Academy is to broaden international access to high quality education through technology, ensuring that each student that leaves their school has the belief to accomplish their goals, and the tools to do it.

Each student goes through a complete assessment to determine the best pathway. They are then placed in the appropriate online student group and matched to the appropriate tutor, counsellor and mentor. Ideally students need to be self-motivated with parent support. It is also their

intention to offer part time courses that schools across New Zealand can access in order to provide additional subject options for individual students.

If their application is approved, COA plans to open in 2020 initially focussing on Year 11-13 students, and over time extending this to include Years 9 and 10. It will not have a physical campus where classes are administered. Instead, COA will teach its students exclusively through online courses that are taught on Crimson's proprietary learning management system.

However, COA does see the value of having physical campuses where students are able to interact for academic and extracurricular reasons and proposes to use two centres in Auckland located at Parnell and Newmarket.

This application is a first of its kind and legal and policy advice has been sought to ensure the criteria under section 35A of the Education Act 1989 is met to allow provisional registration to occur.

Criteria for provisional registration

Suitable Premises:

The School is an online school and the intention is to not have a physical campus like other schools. However, they will operate two centres for academic and extra curricula activities. The centres will also be used as exam centres for testing. The centres are situated at 402 Broadway, Newmarket and 25-27 Crowhurst Street, Newmarket.

Both sites have been visited by MoE Property Advisor, Liona Blair. An approval memo has been provided, signed by Sandra Orr, Regional Infrastructure Manager noting EIS is satisfied that the buildings comply with the requirements for Private School provisional registration outlined in Section 35D of the Education Act 1989. (Appendices 1)

Staffing:

Crimson Education intends to use its existing tutoring operations to provide accredited teachers for the online school.

A list of 15 NZ registered teachers has been provided and who will provide the online tuition. Checks with the Teaching Council confirm all of the teachers are NZ registered. (Appendices 2)

Physical and Emotional Safety of Students

A recent Education Amendment Bill has just passed introducing an additional registration requirement for private schools relating to providing a safe physical and emotional environment for students.

Crimson's application states that to ensure student safety, Crimson will be utilising its existing child safety infrastructure and has partnerships with providers like Youthline and the Safeguarding Children Initiative with which it can create a state-of-the-art support system for all of its students.

The policies cover: (Appendices 3)

- Physical safety
- Emotional safety
- Child safety training
- Staff training
- Cyber safety

- Police vetting
- Disclosures
- Health and safety
- Self harm

Roll numbers:

COA already has a number of Crimson students who would be interested in potentially enrolling were COA to open its doors by the 2020 school year. Based on interest, COA believes that it could enrol around 20-40 students per year for its first two years shortly after launching, and would attempt to grow the 2021 graduating class by doing comprehensive outreach to the existing NZ home school community. Overall, COA would aim to have an application-based enrolment policy that will be open to all students in the country who wish to apply.

Curriculum:

COA intends to offer a version of Cambridge International Education courses from inception to its students, integrated into an original curriculum. COA strongly believes that students should be focused on knowledge accumulation rather than test preparation, and so it will bring in concepts from the NCEA and International Baccalaureate curricula as appropriate to refine the curricula to teach students what they will learn.

COA's approach to curriculum design is based on promoting the development of student competencies over the course of their time at COA. COA borrows from Kaplan University in seeking to promote two types of competencies within each class - program-specific competencies (PSCs) and school-specific competencies (SSCs).

In each year at COA, students will be enrolled in classes in each of their core academic competency areas, along with a foreign language, and two elective courses. Elective courses will be built as adjacent areas to the core academic competency areas to ensure that students remain focused on learning the PSCs and SSCs that are required for them to gain a high-quality holistic education. In both these core classes and the electives they take, students will have opportunities to do projects which reinforce the SSCs that are important to COA's vision of student education.

Per principles of competency-based education, these curricula will also be created to assess students based on their progress across these broad competency areas. The Learning Director of the school will be tasked with creating evaluative standards that ensure that children are consistently developing competencies at an above-average rate, and assesses students against their own benchmarks.

The school's proposed curriculum has been reviewed by Education Advisor, Julie Spedding. Julie noted:

The Education team cannot see any reason for not proceeding with the application for provisional registration, in terms of curriculum review.

Standard of Tuition:

The information provided in the application about curriculum delivery indicates that the standard of tuition will not be lower than that of a state school.

Students will primarily learn through group lectures for the classes they are a part of. The curriculum is structured such that all lectures will come with supplementary assignments that students will work through to accelerate their learning. Students who wish to move faster than the

class will be able to by viewing historical lectures and then taking the competency exams on their own. Tutors will be provided through Crimson Education as an added resource for students to use to help accelerate their learning or solve remedial problems.

Student progress will be very visible to parents, counsellors, and other teachers within the programmes. The goal of COA is to have everyone aligned on the student's learning goals and providing a robust support network to ensure that they continue along the right path. Parents and counsellors will get weekly progress reports on student progress. These progress reports will not only consist of session feedback reports from any 1:1 tutoring sessions, but also quantitative summaries of progress to the agreed learning objectives.

Hours of instruction:

COA will not govern as strict of a timetable as a traditional school. As an online institution, students will have significantly more flexibility with their academic approach to suit their schedules and academic accommodations. All classes will be recorded - while students will not have the ability to ask questions if they do not attend the live class, they will be able to re-watch at their convenience.

COA emphasizes student flexibility and accommodating a variety of learning methods through a pedagogical system that is outcome, not process, focused and will reward students based on their achievement of competency-based objectives over their conforming to traditional educational processes or assessment standards.

COA's live classes will take place between the hours of 9 AM to 5 PM. Student schedules will be flexible depending on the quantity of classes they are taking and, as with every school, intermediate assessments and projects will largely spill over into other hours.

Equipment:

In the traditional sense, COA will use very little equipment. Part of COA's core educational mission is to distribute a high quality of education across the globe with minimal barriers. To that end, having curricula or lesson plans that require using materials that are not immediately accessible to all students (e.g. high-cost calculators, chemistry lab equipment, etc.) goes contrary to the requirement-light COA aims to provide its students.

The major equipment that COA will require of each student is a high-quality, functioning computer through which the student can consume all of the educational content COA provides and complete all of the required assessments. Reading materials for classes will all be provided through the learning management system, as will all assessments and textbooks used, such that students can accomplish the majority of assessments using very basic tools (e.g. standard calculators, pens and paper/basic word processors, etc).

Managers:

Shandre Kushor has been listed as the Learning Director of the School. A Fit and Proper Person Statutory Declaration has been received and witnessed by Trent Bowler, Solicitor, Auckland.

The Crimson Education Board comprises, Jamie Eaton, CEO of Crimson Consulting, Larry Summers, former President of Harvard University, a former U.S. Secretary of the Treasury, Director of the White House National Economic Council, and Chief Economist of the World Bank, Bror Saxberg, former Chief Learning Officer of Kaplan University, Keisuke Shibata, CEO of Oak

Tree Holdings, John Morris, former Headmaster of Auckland Grammar School and David Freed, VP, Finance - Operations at Crimson Consulting.

Planning Manager Schooling Network advice and comment

This application meets the requirements for provisional registration as a private school. A recent Education Amendment Bill now requires private schools to provide information on how they will provide a safe physical and emotional environment for its students. We have worked closely with the Wellington Network Team to ensure COA has provided a comprehensive policy around student safety.

I recommend that you approve the provisional registration of Crimson Online Academy effective Monday 18 February 2020, for a period of 12 months. If approved, please sign the attached letter to the school.

Note: Approval of this application is likely to attract media attention. A brief media statement has been prepared should we receive any media enquiries. (Appendices 4)

Recommendation (Circle one)

Approve Not Approve

Signed: Janet Schofield Dated: 11/07/19

Janet Schofield
Planning Manager

Approve Not Approve

Signed: Rachael Laurensen Dated: 22/07/19

Rachael Laurensen
Education Manager

Decision (Circle one)

Approve Not Approve

Signed: Isabel Evans Dated: 8/8/19

Isabel Evans
Director of Education

- Appendices 1 - Property check sheet and photos
- Appendices 2 - List of registered teachers
- Appendices 3 - Child protection policy
- Appendices 4 - Draft media

Released under the Official Information Act 1982

Private Schools Checklist - Building Inspection



To be completed by Regional Infrastructure staff

School name: School number:

School contact: Date of inspection: DD/MM/YYYY

BWOF: Yes No Date issued: DD/MM/YYYY

Code Compliance Certificate: DD/MM/YYYY

Resource Consent: DD/MM/YYYY

Attach copies of final sign-off

Roll

Current roll: No. classrooms: No. specialist rooms: Gym/hall:

List roll by year: Y0: Y1: Y2: Y3: Y4: Y5:

Y6: Y7: Y8: Y9: Y10: Y11:

Y12: Y13:

Fire Safety and Design

Does the fire safety and design meet Building Code requirements?
 Yes No

If no, state why

Emergency plan Building fire rating

Evacuation areas

Access ways Fire alarm system (Type)

Smoke detectors

Sprinkler system

Environment

Do the classrooms meet Building Code requirements for interior environment?

Yes No

Comments

Classroom area is well lit, ventilated and kept at a comfortable temperature.

Lighting

STRIP LIGHTS

Heating source

Air con for heating + cooling

Glazing

Single glazed

Staff facilities

Staffroom area

Sick bay

Teacher areas

Administration

Toilets

Compliant with Building Code requirements?

Yes No

1 UNISEX, 1 ACCESSIBLE
USED BY STAFF + STUDENTS.

No. Male

No. Female

No. Staff

Accessible toilet?

Yes No

Outside areas

Area of playground (sqms)

N/A

Covered outside area?

Yes No

Fields

Yes No

If no, where is physical education curriculum taught?

N/A

Parking

No. of carparks

10

Traffic Management Plan?

Traffic flows marked one way direction?

Off street drop off and pick up?

Bus way separate from car park?

Safe egress and ingress for children?

Comments

Ten car parks at front of building, utilised ^{mainly} ~~safety~~ for drop off/pick up of students.

Approval

Checked by

Shamdré Kushor
Consultant's name

Crimson Consulting Limited
Consultant's company

[Signature]
Signature

29/05/2019 DD/MM/YYYY
Date

LIONA BLAIR
Property Advisor name

[Signature]
Signature

29/05/2019 DD/MM/YYYY
Date

Sandra Orr
Regional Infrastructure Manager name

[Signature]
Signature

29/05/2019 DD/MM/YYYY
Date

Copy of report sent to

[Blank]
ECP Senior Advisor name

[Blank]
Signature

 / / DD/MM/YYYY
Date

Released under the Official Information Act 1982

5/3/2019

Ref: 325/1 - KD

Daniel Scott
Tram Lease Limited
PO Box 90 534
Victoria Street West
Auckland 1142

Dear Daniel

**Dryclners,Ziera,Suits,NumbWorks,Kid Rep,ITZME,Jill
392-410 Broadway, Newmarket, Auckland**

Please find enclosed a copy of the completed Building Warrant of Fitness for the above building.

We will install the Building Warrant of Fitness in the building on our next visit.

A copy of the Building Warrant of Fitness and the Forms 12A have been forwarded to Auckland Council - Central Building Control as required by the Building Act 2004.

The reports are to be kept for a minimum of two years at the above address to be made available to the Territorial or any Statutory Authority that requests them.

We thank you for favouring us with the work and trust it is to your satisfaction.

Yours faithfully
Compliance Consultants Ltd



Kit Dean
DDI 09 377 7427

Box 8056, Symonds St, Auckland. Ph (09) 377 7420

5/3/2019

Ref: 325/1 - KD

The Chief Building Control Officer
Auckland Council - Central Building Control
Private Bag 92300
Auckland 1142

Dear Sir/Madam,

**Dryclners,Ziera,Suits,NumbWorks,Kid Rep,ITZME,Jill
392-410 Broadway, Newmarket, Auckland
Compliance Schedule No. HCS/96/00031**

Please find enclosed, the renewed Building Warrant of Fitness for the above building.

Any queries regarding this Building Warrant of Fitness should be directed to the writer.

Yours faithfully
Compliance Consultants Ltd



Kit Dean
DDI 09 377 7427

ARGUS FIRE SYSTEMS SERVICE LIMITED
314A Neilson Street, Onehunga, AUCKLAND
Ph: 09 634-0250 Fax: 09 634-7319 Email: compliance@argusfire.co.nz

CERTIFICATE OF COMPLIANCE WITH INSPECTION, MAINTENANCE, AND REPORTING PROCEDURES
SECTION 108 (3) (c) – BUILDING ACT 2004 – FORM 12A

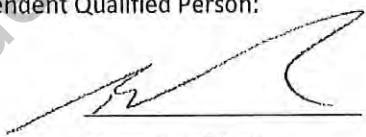
THE BUILDING:
Street Address of the building: 392-410 Broadway, Newmarket
Legal description of land where building is located: Lot 4-7 DP 27122
Building Name: Drycleaners, Ziera, Suits, NumbWorks, Kid Rep, IRZME, Jill
Location of building within site / block number: -
Level / Unit number: -

THE OWNER:
Name of Owner: Tram Lease Limited
Mailing Address: P O Box 90534, Victoria St West, Auckland 1142
Street Address:

COMPLIANCE:
The inspection, maintenance, and reporting procedures of the compliance schedule number **HCS/96/00031** have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

2.1	EMERGENCY WARNING SYSTEM Type 2	COMPLIANT
-----	---------------------------------	-----------

Signed by the Independent Qualified Person:

SIGNATURE: 
NAME: Bryce Donaldson
POSITION: General Manager - Northern
IQP REGISTRATION NO: 110289
DATE: 14 January 2019

Email: reports@compliance.co.nz
CCL Ref: 325/1 KD ✓

14 JAN 2019

All reasonable care has been taken to ensure that the information provided in this annual report is correct at the time of writing. We will not accept any liability for anything done or not done in reliance on the information in this annual report.

Certificate of Compliance with inspection, maintenance, and reporting procedures.

The Building

- Street address of building: 392-410 Broadway, Newmarket, Auckland
- Legal description of land where building is located: Lot 4-7 DP 27122
- Building name: *Regal Dry cleaners only.*
- Location of building within site/block number:
- Level/unit number:

The Owner

- Name of owner: Tram Lease Limited
- Mailing address: PO Box 90534, Victoria Street West, Auckland 1142

Compliance

- The inspection, maintenance, and reporting procedures of the Compliance Schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

Systems

- 2 Emergency warning systems for fire or other dangers
- 3/3.1 Interfaced fire or smoke stop doors or windows (interface test only)

Terry Lewin
.....

8.1.1.2019
Date

Signature of independent qualified person
IQP Name (on register) *TERRY LEWIN*
Reg No. *110005*

Notes:

If this Form 12a does not cover the whole building please state which areas are included.

Site Contact:
Site Phone:
C/S records held: the above address
CCL Ref: 325/1 - KD ✓
Service Agent = Jimtal Electronics Ltd

BWOF Annual: 08/02
C/S Ref: HCS/96/00031
Territorial Authority:
Auckland Council - Central Building Control
Fax No. 416 9921

rplIQPprocessForm12A

**Please Return by: 8/1/2019 to fax (09)3777-540 or email:
reports@compliance.co.nz**

Box 8056, Symonds St, Auckland. Ph (09) 377 7420

- 7 JAN 2019

ASSA ABLOY Entrance Systems NZ Ltd - FORM 12A

CERTIFICATE OF COMPLIANCE WITH INSPECTION, MAINTENANCE, AND REPORTING PROCEDURES
SECTION 108 (3) (C) - BUILDING ACT 2004

Compliance Schedule: HCS/96/00031

Record: 20502640

Reference: 325/1 - IW

AK01163

THE BUILDING:

STREET ADDRESS OF BUILDING: 392-410 Broadway, Newmarket, Auckland 1023
LEGAL DESCRIPTION: Lots 4-7 DP 27122
BUILDING NAME: Ziera Shoes
LOCATION OF BUILDING: Auckland

THE OWNER:

NAME OF OWNER: Tram Lease Limited
MAILING ADDRESS: PO Box 90534, Victoria St West, Auckland 1142
Contact Person: Owners
STREET ADDRESS: PO Box 90534, Victoria Street West, Auckland 1142

COMPLIANCE

The inspection, maintenance, and reporting procedures of the compliance schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

SS3.1 Automatic Sliding Doors (tested to NZS 4239 standard) x 1 (Main Entry to Ziera Shoes)

SIGNED IN ACCORDANCE WITH THE COMPLIANCE SCHEDULE AND THE BUILDING ACT:

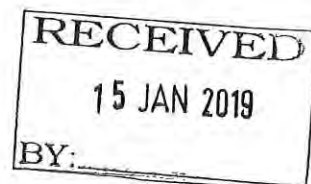
NAME: Simon Paul

POSITION: IQP Certified

IQP/LBP No: 110554

DATE: 04 January 2019

SIGNED:



325/1

Certificate of Compliance with inspection, maintenance, and reporting procedures.

The Building

- Street address of building: 392-410 Broadway, Newmarket, Auckland
- Legal description of land where building is located: Lot 4-7 DP 27122
- Building name: NumbWorks
- Location of building within site/block number:
- Level/unit number:

The Owner

- Name of owner: Tram Lease Limited
- Mailing address: PO Box 90534, Victoria Street West, Auckland 1142

Compliance

- The inspection, maintenance, and reporting procedures of the Compliance Schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

Systems

- 4 Emergency lighting system

[Signature]
.....
Signature of independent qualified person
IQP Name (on register) *Tram Lease*
Reg No. *110005*
NUMBWORKS ONLY

22.1.2019
.....
Date

Notes:

If this Form 12a does not cover the whole building please state which areas are included.

Site Contact:	BWOF Annual: 08/02
Site Phone:	C/S Ref: HCS/96/00031
C/S records held: the above address	Territorial Authority:
CCL Ref: 325/1 - KD	Auckland Council - Central Building Control
Service Agent = Pacific Building Services	Fax No. 09 279 3719

rplIQPproceedForm12A

Please Return by: 8/1/2019 to fax (09)3777-540 or email: reports@compliance.co.nz

Box 8056, Symonds St, Auckland. Ph (09) 377 7420

29 JAN 2019

Certificate of Compliance with inspection, maintenance, and reporting procedures.

The Building

- Street address of building: 392-410 Broadway, Newmarket, Auckland
- Legal description of land where building is located: Lot 4-7 DP 27122
- Building name: Dryclners,Ziera,Suits,NumbWorks,Kid Rep,ITZME,Jill
- Location of building within site/block number:
- Level/unit number:

The Owner

- Name of owner: Tram Lease Limited
- Mailing address: PO Box 90534, Victoria Street West, Auckland 1142

Compliance

- The inspection, maintenance, and reporting procedures of the Compliance Schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

Systems

- 7 Automatic back-flow preventer connected to a potable water supply

..... *[Signature]*
Signature of independent qualified person
 IQP Name (on register)..... *RD HILL*
 Reg No..... *110101*

24.1.19
Date

Notes:

If this Form 12a does not cover the whole building please state which areas are included.

Site Contact:	BWOF Annual: 08/02
Site Phone:	C/S Ref: HCS/96/00031
C/S records held: the above address	Territorial Authority:
CCL Ref: <u>325/1 - KD</u>	Auckland Council - Central Building Control

Service Agent = Backflow Prevention Services Ltd. Fax No. rplIQPproceedForm12A

Please Return by: 8/1/2019 to fax (09)3777-540 or email: reports@compliance.co.nz

Box 8056, Symonds St, Auckland. Ph (09) 377 7420

30 JAN 2019 ✓



FORM 12A

Certificate of Compliance with Inspections, Maintenance and Reporting Procedures

Section 108(3)(c), Building Act 2004

The Building	
Building name	Numberworks Tenancy
Compliance schedule number	HCS/96/00031
Street address of building	392-410 Broadway, Newmarket, Auckland 1023
Legal description of land where building is located	Lot 4-7 DP 27122
The Owner	
Name of Owner	Tram Lease Limited
Mailing address	P O Box 90534, Victoria Street West, Auckland 1142
Street address	
Registered office	

Compliance

The inspection, maintenance and reporting procedures of the compliance schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified systems:

SS9 Mechanical ventilation or air conditioning systems

Date: 30th January 2019

Registration No: 110809

Signature of Independent Qualified Person:


Warren Hughes

RECEIVED
31 JAN 2019
BY: _____

PO Box 71055
399 Rosebank Road, Avondale, Auckland
Phone 0800 278 269
Email aklcompliance@aquaheat.co.nz

325/1

Certificate of Compliance with inspection, maintenance, and reporting procedures.

The Building

- Street address of building: 392-410 Broadway, Newmarket, Auckland
- Legal description of land where building is located: Lot 4-7 DP 27122
- Building name: Dryclnrs, Ziera, Suits, NumbWorks, Kid Rep, ITZME, Jill
- Location of building within site/block number:
- Level/unit number:

The Owner

- Name of owner: Tram Lease Limited
- Mailing address: PO Box 90534, Victoria Street West, Auckland 1142

Compliance

- The inspection, maintenance, and reporting procedures of the Compliance Schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

Systems

- 9/2 Mechanical ventilation or air conditioning systems

.....
Signature of independent qualified person
IQP Name (on register) GEORGE REED
Reg No. 110455

15.01.19
Date

Notes: *We only look after Ziera shoes.*
If this Form 12a does not cover the whole building please state which areas are included.

Site Contact:
Site Phone:
C/S records held: the above address
CCL Ref: 325/1 - KD

BWOF Annual: 08/02
C/S Ref: HCS/96/00031
Territorial Authority:
Auckland Council - Central Building Control

Service Agent = 1st Maintenance

Fax No. 525-1805

rplIQPproceedForm12A

Please Return by: 8/1/2019 to fax (09)3777-540 or email: reports@compliance.co.nz

Box 8056, Symonds St, Auckland. Ph (09) 377 7420

Form 12A
Section 108(3) (c) Building Act 2004

Certificate of Compliance with inspection, maintenance, and reporting procedures.

The Building

- Street address of building: 392-410 Broadway, Newmarket, Auckland
- Legal description of land where building is located: Lot 4-7 DP 27122
- Building name: Dryclners,Ziera,Suits,NumbWorks,Kid Rep,ITZME,Jill
- Location of building within site/block number:
- Level/unit number:

The Owner

- Name of owner: Tram Lease Limited
- Mailing address: PO Box 90534, Victoria Street West, Auckland 1142

Compliance

- The inspection, maintenance, and reporting procedures of the Compliance Schedule have been fully complied with during the 12 months prior to the date stated below in relation to the following specified system/s:

Systems

- 14/2 Signs for specified system(s) 1- 13
- 15(b) Final exits / means of escape
- 15(c) Fire separations protecting a means of escape
- 15(d) Signs for communicating information intended to facilitate evacuation
- 15(e) Smoke separations
- 3/3 Interfaced fire or smoke stop doors or windows

.....  **Mike Gordon**

Signature of Independently Qualified Person
Compliance Consultants Ltd IQP Reg No. 110205

15, 1, 19
.....
Date

Site Contact:
Site Phone:
C/S records held: the above address
CCL Ref: 325/1

BWOF Ann: 08/02
C/S Ref: HCS/96/00031

rplIQPproceedForm12ACCL

Backflow Prevention Valve (I.Q.P.) Annual Test Report

Our Job number: RH112,319
Owner / Occupier: Regal Drycleaners
Site address: 392 - 410 Broadway, Newmarket
Site contact:
Agent for Owner / Occupier:
Your order / ref: 325/1 - LT - 2019
Number of B/F on site: 1

Page 1 of 1

Recommend site Survey within.

Location of B/F: **On supply within building (Located rear of Drycleaners down stairs in doorway)**
Make/Model of B/F: **Flowmatic 9100** Serial Number: **# H9034**
Type of B/F: **D/C** Size of B/F: **25mm** Line strainer present: **yes**
1st check: **14** 2nd check: **16** Relief: **n/a** KPA reading: **740**
The above Backflow valve has: **passed** Test Date: **24 Jan 2019**
Note:

Certified by R D Hill



Test kit last calibrated on 17/07/18 - GCN 5530 (IQP Number 110101 - Auckland Council)

All backflow valves tested to AS2845.3 and test kits calibrated to AS1349

PLEASE NOTE: This backflow prevention Valve Test Report is not a survey of your site. There may well be prohibited crossconnections on your site. If they exist they are a major HEALTH RISK to the people within your site and must be addressed.

Backflow Prevention Services Ltd

P O Box 62 Red Beach Auckland 1462
Ph 0800 222 356 or (021) 925 317

Teacher name	Registration number
s 9(2)(a) 	

Released under the Official Information Act 1982



Child Protection Policy

Crimson

July 2019

Released under the Official Information Act 1982

Overview

Crimson Education has long maintained a culture where child safety is of paramount importance. As it expands into the online schooling space, Crimson is dedicated to maintaining its high-quality child safety apparatus and having administrators provide the best possible service to both students and parents. Crimson has sought to embed a culture of child safety that consistently safeguards children and promotes their well-being (see Background below).

This document will concisely lay out the policies that Crimson's online high school will use. These policies have been created in line with the Vulnerable Children's Act of 2014 and Crimson's best understanding of how to best serve New Zealand students (whether European or Maori), reflecting the principles and spirit behind NAG 5. Crimson is deeply dedicated to providing a quality experience for every student that it can (in line with NAG 1 and NEG 2) and understands how important child safety is to this.

This policy will be reviewed annually by the Board of Crimson's online high school and all applicable changes will be made speedily and efficiently. As illustrated below, employees will be going through consistent trainings to ensure they fully embody the value of child safety and are dedicated to the cause.

This document includes __ sections:

- Background - An overview of existing Crimson policies
- Key Principles - Discussion of Crimson's critical child safety principles
- Staff Trainings - Explanation of training policies for staff
- Cyber Safety - Overview of the procedures Crimson will use to ensure safety in all online interactions
- Reporting Standards - Overview of how child safety concerns are handled
- Health & Safety At Work - Overview of procedures for existing staff
- Policy Review - Detailed description of how this policy is consistently reviewed
- Other Policies - Relevant Crimson policies that do not fit into the above buckets

Background

In 2017, Crimson Education identified the needs to (a) develop a comprehensive child safety policy for its global network of staff and contractors to be able to manage and support students and their families, and (b) equip the Crimson team with these best practice trainings and policies.

To develop and roll out its child safety program, Crimson Education engaged a child safety consultant with extensive experience in the area. The consultant was a Kidsline team leader for 6 years and a counsellor on an adult services helpline. Kidsline is New Zealand's largest national counselling service for children 14 and under (0800 Kidsline). This consultant worked with Crimson to develop a comprehensive child safety training that is now required for all members of Crimson's service team who interact with students.

Existing Crimson Programmes

Physical Safety

Since Crimson Education is an online service provider, no physical contact occurs between its contractor network of tutors, mentors and consultants and Crimson students. Students and their parents on occasion may visit a Crimson office, but are normally accompanied by at least one permanent staff member.

All front-line sales staff and all tutors, mentors and consultants (essentially, all Crimson part-time contractors) have completed at a minimum Crimson's Tier 1 Child Safety training. All full-time service staff globally have completed more extensive training, doing both Tier 1 and Tier 2 child safety trainings (see below) in order to ensure that they fully understand how to respond to any situations that arise with a student.

Emotional Safety

The child safety policy and training has a strong focus on emotional safety due to the nature of Crimson's services, which are delivered online and not face-to-face. As detailed below, the training covers not only how to handle difficult scenarios with students but also the proper escalation procedures when the student's situation demands the attention and expertise of a medical professional.

Child Safety Training

All training is provided online using a platform available to all staff and contractors with active management and tracking to ensure compliance and completion of the training in a prompt manner. No service staff are allowed to begin working with students (part-time or full-time) until they have completed the applicable child safety trainings.

Tier 1 training includes (but is not limited to):

- Child abuse and self-harm definitions and management
- Escalation policy
- Responding to unsafe child practice
- Code of conduct and standards

- 5 assessments of understanding and compliance with 100% pass requirement

Tier 2 includes (but is not limited to):

- Roles and responsibilities within Crimson for managing child safety
- Working with contractors and employees
- Reports of Concern - what they are, how and when to use one
- Responding to risk
- Working with disclosures of child abuse
- Emergency services and other agencies
- Grounding
- Welfare checks - student and parent
- Compassionate conversations
- Aftercare
- 5 assessments of understanding and compliance with 100% pass requirement including the completion of a Report of Concern

The child safety training is included in the on-boarding and induction for all new Crimson Sales and Service staff and contractors and there is a requirement for each team member to complete an annual refresher.

Child Safety Management

To ensure on-going compliance of the program and management of child safety issues, Crimson Education has two Child Safety Officers, one based in New Zealand and one based in the United Kingdom, who are responsible for the global team of staff and contractors in regards to child safety.

Crimson Education also uses a customer management system globally for its team of Education Coordinators who are the first and key point of contact for all Crimson students and parents. This CMS system has a dedicated child safety feature that allows the capture of reports of concern and automatic escalation to ensure the client's privacy is maintained once key data is captured. The process is trackable by the Child Safety Officers from the point the report of concern is initiated and is secured so not visible by any other employees.

Key Principles

The board of trustees of the Crimson Academy is committed to ensuring the health and safety of all workers, students, and contractors by complying with the relevant health and safety legislations, regulations, New Zealand local standards, and approved codes of practice.

Since the board of trustees is committed to providing this safe and healthy workplace for all the people who are involved in any capacity with the Crimson Online Academy, the Board has vowed to:

- Make health and safety a key part of all operations at the Crimson Online Academy, beginning with all hiring and application practices;
- Working hand-in-hand with our workers to ensure that we have a world-class health and safety system at the school;
- Doing everything policy to ensure that students are behaving in a safe and effective manner during all interactions, and removing or reducing any risk of injury or illness - whether mental or physical;
- Investigating any incidents with the utmost seriousness and putting serious resources to bear at figuring out anything that could potentially harm our students or workers;
- Having emergency plans and procedures in place to deal with any potential situation that arises;
- Training everyone involved with the students about the hazards and risks of online communications, with an eye towards the perils of cyberbullying and the importance of promoting tolerance and diversity with a globally dispersed student body;
- Providing the appropriate induction, training, and supervision for all new and existing workers and students to foster the right atmosphere and promote health and safety across the school;
- Helping all students or workers who are injured or ill return to work safely and have a smooth transition back to full-time status;
- Having very smooth guidelines for all contractor hires and ensuring that they operate in a safe manner that is conscious of and focused on providing the ultimate student experience;
- Creating appropriate expectations of cyber privacy and security by working hard to preserve all student data and keeping systems safe to provide an optimal learning environment.

Expectations will be high for both students and workers for them to maintain and promote a safe and healthy workplace at every turn by doing the following:

- Staying involved in improving health and safety systems, specifically volunteering any instances where they do not feel that the school's values are being properly upheld;
- Following the school guidelines to ensure that at every point, the proper regulations are being taken heed;

- Reporting any instance where there have been injuries or illnesses, mental or physical, that resulted from anything that was going on with respect to the Crimson Online Academy;
- Working with all new students and staff members to ensure that they understand the standards and are working towards providing the same high-quality environment to their peers;

The same expectations will apply to everyone that is involved with the school in a formal capacity, from contracted employees (that do or do not work with students) to the Board itself.

All staff will be provided with comprehensive training that helps them accomplish the objectives listed above. Crimson Online Academy considers health and safety to be the province of every employee, student, and teacher - there will be no exceptions and all involved parties will be responsible for ensuring the integrity of the system is maintained at the highest levels.

In accordance with the above, the Board has adopted the MoE's four key principles of child safety:

- We have the wellbeing of child as our primary concern and the child is at the centre of all decisionmaking when responding to suspected abuse or neglect;
- We promote a culture where staff feel confident to constructively challenge poor practice and raise issues of concern;
- We recognize the culture of the family/whānau, its importance and the rights of family/whānau to participate in decision-making about their children unless this would result in an escalation of risk to the child;
- We let all staff know they can report suspected child abuse and neglect to Child, Youth and Family (CYF) or the Police

Staff Trainings

Crimson will ensure that all employees are fully up to date on all applicable trainings throughout the duration of their time working with children. All online-only employees will be required to complete both the Tier I and Tier II trainings referenced above. This will include any tutors who are working with students, any consultants or mentors working with students, and any professor who are giving live-streamed lectures to students.

Further, all administrative employees will be required to complete both Tier I and Tier II trainings to ensure a culture of child safety within the school. For any of the proposed physical co-working spaces (whether at partner schools or within existing Crimson tuition centres), all employees who come into contact with students will be required to complete the trainings. To be consistent with standard Crimson policy, both Tier I and Tier II trainings must be completed ahead of any student work. Child safety is and will continue to be strictly monitored during the onboarding process to ensure there are no holes.

Relevant student resources will also be broadly available to all parties within the context of the Crimson App, such that students and parents are always fully apprised of what to go or where to go in the case of any emergency

To ensure that this extends down to all parties, students who enter the school will have to take compulsory health and safety trainings that will help teach them not only the key touchstones of the school's health and safety culture, but also how to deal with specific situations that may come up and how to best preserve a clean environment for learning that is supportive of fellow learners

Among the topics students will have to learn about:

- Expert Mental Health Techniques
- Proper Online Communications With Peers
- Long-Term Impacts of Cyberbullying
- Bias Training¹

This lecture content will be re-affirmed in examinations that all students have to pass before they are able to start their academics with the school. The standard content will be something students have to re-engage with at the beginning of each year (exact form to be determined, but will likely include having to re-pass exams) to ensure they do not slip in their understanding. These health and safety plans will be reiterated by teachers in their classes directly with students.

As Crimson develops further, it will continue to refine and improve these trainings in line with the most updated legislation and to reflect the best practices it sees in other companies around the world. Crimson is dedicated to doing an annual review of its child safety practices within its existing business, and all learnings and changes will be passed on to the trainings used for the Crimson Online Academy.

¹ This training will include standard diversity training as well as student education on what constitutes harmful speech and how to properly behave in a diverse, global classroom.

Cyber Safety

Crimson is conscious that child safety and health goes beyond simply physical health. For that reason, Crimson will put into place policies dedicated to protecting the emotional health of students as they interact with Crimson through its online platforms. These policies are intended to mitigate the influence of cyberbullying and ensure a safe and healthy atmosphere across Crimson platforms.

As a first measure, Crimson will be supervising all messaging systems that it has and monitoring all public message boards through its platform for cyberbullying or any other behavior which makes the atmosphere difficult for its students. Student interactions through the online platform will be closely followed and triggers set in to alert teachers in the case of any troubling commentary. Crimson aims to add some part-time employees in the near future whose job it will be to constantly monitor the communication between students and make sure that toxic language that is not being picked up by existing systems is addressed in that fashion.

To further ensure that all teachers that interact with students will exhibit the best practices of child health and safety and live up to Crimson's internal standards, the Crimson team has committed to putting in place the following procedures:

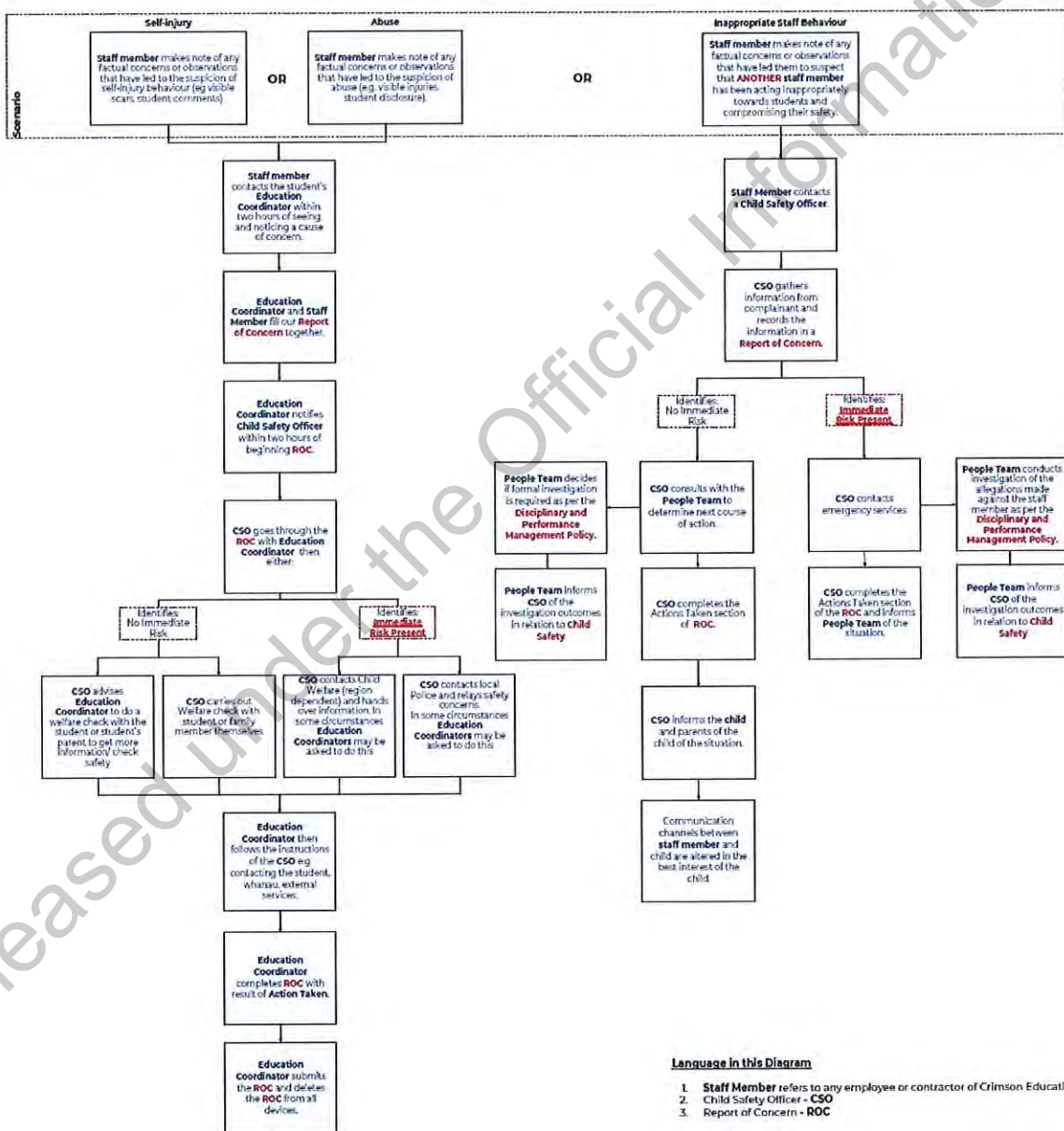
- All sessions between Crimson teachers and students will be recorded (pending student permission) as a means of accomplishing a couple of important pedagogical and health objectives:
 - Firstly, by having records of the student studies, Crimson intends to vigilantly enforce high quality standards across its student service operations
 - Secondly, these videos will be referenced in the case of any dispute between teachers and students and will be used to adjudicate any cases where there are child health concerns
 - To address privacy concerns, these sessions will be accessible only to a select and limited group of school administrators
- Crimson will perform extensive police vetting of all teachers who deal with Kiwi students, even if their interactions are completely online
 - Crimson intends to liaise directly with the New Zealand Police Licensing and Vetting Service Centre to ensure that all of its teachers have passed the appropriate examinations
 - Contractors who work with the school will undergo a similar process, and they will be required to produce - prior to hiring - their past work experience, references, evidence of their qualifications, and descriptions of how they will protect the school's health and safety culture

Reporting Standards

Crimson has already created a robust set of child safety procedures that govern how the organization responds when it is made aware of any potential situation with a student. The Crimson Online Academy will use a very similar system, replacing the "Education Coordinator" with the Child Safety Office that is employed by the school.

As can be seen in the below diagram, the staff members are held accountable to immediately report the issue up the chain, at which point Crimson identifies whether there is immediate risk to the student and proceeds further with calling in appropriate parties and filing a Report of Concern (ROC) so that all involved parties with the child can be fully aware of the situation after the fact.

Crimson Education Child Safety Escalation Procedure



As it stands, if a staff member has a concern about a child's safety or wellbeing they will, in all instances, follow the Crimson Escalation Policy by reporting to either the students Education Coordinator or the corresponding Child Safety Officer. This will be done at the first possible opportunity to best ensure the safety of the child. The severity of the suspected abuse or neglect is not up to the staff member or Education Coordinator to determine. The Child Safety Officer has the responsibility to ensure appropriate authorities are notified.

In consultation with their Child Safety Officer, Crimson will always respond if they suspect abuse or self-injury of a child, regardless of who may be involved, as follows:

- i. **Contact the Police** immediately if a child is in immediate danger. The primary response must be to ensure the safety of the child. This includes danger to oneself.
- ii. **Contact Child Welfare** to discuss appropriate steps where:
 - a) A child has disclosed abuse or neglect (see table below)
 - b) Abuse or neglect of a child has been disclosed by the person responsible
 - c) A staff member has observed abuse or neglect, or suspects abuse or neglect on the basis of their own observations
 - d) A third party has told a staff member of known child abuse or neglect, or of their suspicions of possible child abuse or neglect
- iii. **Contact family** where the concern is more of a general, well-being related concern and not specifically about abuse or neglect. This is if there has been a safe family/whānau member identified by the child.

All staff have a responsibility to discuss any child protection or wellbeing concerns with their Child Safety Officer. These CSOs have a responsibility to follow procedure and ensure that the appropriate authority is notified when a staff member informs them that a child has been, is likely to be, or is suspected of being, abused or has plans to self-injure. This extends to ensuring that all known information about the child, young person, and their siblings and family, is shared in full with the appropriate authority, to determine the most appropriate response (see section below on confidentiality and information sharing). It is therefore essential that managers/supervisors delegate this responsibility during times of absence and that their staff are aware of the delegation.

Where a third party has advised of the abuse, that person will be encouraged to report the information to the appropriate service. In the spirit of full ownership and collective responsibility for child safety, where a third party has been encouraged to report information, Crimson staff will make a report as well if there is immediate risk to a child's safety.

+ Crimson Guidelines For Responding when a Child Discloses Abuse

Listen to the child

Disclosures by children are often subtle and need to be handled with care.

Reassure the child	Let the child know that they are not in trouble and have done the right thing. While reassuring the child it is important that you do not agree 'not to tell anyone'.
Ask open ended prompts, e.g. "What happened next?"	Do not interview the child (do not ask questions beyond open prompts for the child to continue).
If the child is visibly distressed	Provide appropriate reassurance and engage in appropriate activities.
If the child is not in immediate danger	Re-involve the child in ordinary activities and explain what you are going to do next.
As soon as possible formally record the disclosure	With the child's Education Coordinator, record: <ul style="list-style-type: none"> + Word for word, what the child said. + The date, time and who was present. + Use the provided Crimson documentation forms

+ Crimson Guidelines to Notify Authorities with Suspected Abuse

What process to follow	For example	Key considerations
Recording	Formally record: <ul style="list-style-type: none"> + Anything said by the child. + The date, time, location and the names of any staff that may be relevant. + The factual concerns or observations that have led to the suspicion of abuse or neglect (e.g., any physical, behavioural or developmental concerns). + The action taken by your organisation. + Any other information that may be relevant 	Relevant information can inform any future actions.
Decision making	Discuss any concern with the education coordinator or the designated person for child protection	No decisions should be made in isolation Child Welfare will:
Notifying authorities	Notify Child Welfare promptly if there is a belief that a child has been, or is likely to be abused.	I. Make the decision to inform the parents or caregivers, in consultation with our organisation. II. Advise what, if any, immediate action may be appropriate,

including referring the concern to the Police

Following the advice of Child Welfare

Child Welfare advice will include what, if any, immediate action may be appropriate, including referring the concern to the Police

Child Welfare is responsible for looking into the situation to find out what may be happening.

Storing relevant information

Securely store:

- + The record of the concern.
- + A record of any related discussions (including copies of correspondence, where appropriate).
- + A record of any advice received
- + The action your organisation took, including any rationale.
- + This concern with any earlier concerns, if the notification is based on an accumulation of concerns (rather than a specific incident).

Records assist in identifying patterns

+ Crimson Guidelines to Respond to Students Who Disclose Self-Harm

Listen to the child

Disclosures by children need to be handled both calmly and directly.

Validate the child

Let the child know that they are not in trouble and you understand that they must be in a lot of pain. While reassuring the child it is important that you do not agree 'not to tell anyone'.

Establish level of risk

Use direct questions to clarify if the child is of imminent danger to themselves e.g "Have you been thinking of suicide?" Do you have a plan to take your life?"

This type of question, when done calmly, shows the child that they are not alone.

If the child is visibly distressed

Provide appropriate reassurance and engage in appropriate activities.

If the child is not in immediate danger

Re-involve the child in ordinary activities and explain what you are going to do next. This could involve providing them with resources, eg. helplines

As soon as possible formally record the disclosure

With the Education Coordinator, record:

- + Word for word, what the child said.
- + The date, time and who was present.
- + Use the provided Crimson documentation forms

If the child is in immediate danger

Help them create a safe plan which may involve external agencies like the police. Consult with the Child Safety Officer.

+ Crimson Guidelines to Record/Notify Police for a Child in Immediate Danger

What process to follow	For example	Key considerations
Recording	<p>Formally record:</p> <ul style="list-style-type: none"> + Anything said by the child. + The date, time, location and the names of any staff that may be relevant. + The factual concerns or observations that have led to the suspicion of self-injury behavior (e.g visible scars, being under the influence of substances). + The action taken by your organisation. + Any other information that may be relevant 	<p>Relevant information can inform any future actions.</p>
Decision making	<p>Discuss any concern with the Education Coordinator or the designated person for child protection</p>	<p>No decisions should be made in isolation</p>
Notifying authorities	<p>Notify Police promptly if there is a belief that a child is at risk of fatally harming themselves soon.</p>	<p>Police will make the decision to on whether to contact the child. This could be either via phone or in person.</p>
Storing relevant information	<p>Securely store:</p> <ul style="list-style-type: none"> + The record of the concern. + A record of any related discussions (including copies of correspondence, where appropriate). + A record of any advice received + The action your organisation took, including any rationale. + This concern with any earlier concerns, if the notification is based on an accumulation of concerns (rather than a specific incident). 	<p>Records assist in identifying patterns</p>

Released under the Official Information Act 1982

Health and Safety at Work

In line with the 2015 Health and Safety At Work Act, Crimson seeks to support health and safety at all levels of the organization to ensure that the principles underlying its child safety provisions are echoed across the organization. The following section explains the key policies and safeguards that Crimson will implement to be in compliance with the 2015 HSWA, and will be annually reviewed (by both worker representatives and a relevant subcommittee of the Board) in order to ensure that there are never any questions of safety within the workplace.

HSRs

While it is the responsibility of every employee to be pushing for health and safety across their workspace, the Crimson Online Academy will appoint special representatives to handle concerns that have been raised and liaise with an appropriate Board Subcommittee on this topic.

HSRs will have a series of important responsibilities:

- Represent workers in all health & safety related complaints
- Investigate any worker complaints related to health & safety
- Monitor and execute all measures created by the Board to enforce health & safety standards across the organization
- Liaise directly with the Board to monitor the health & safety culture of the organization and create applicable policies to fix any issues
- Investigate anything that appears to be a risk to worker health & safety, even if no complaint has been formally raised

HSRs will be pooled from the general pool of employees and the Board will ensure that there is accurate representation across all of the divisions of the Company so that employees have designated representatives they can go to with complaints. All HSR training will be comprehensive and shall cover everything mentioned under NZQA Unit Standard 29315. HSRs will receive continual training as directed by the Board to ensure the organization has up-to-date safety standards that are consistently enforced across the organization.

Subcommittee

The Board will create a sub-committee that is specifically dedicated to health and safety that will work with the HSRs to promote a safe and healthy culture across Crimson. This subcommittee will also include senior members from the student experience side of the Operations department, ensuring that any complaints are heard at the highest levels.

This subcommittee will not only be in charge of coordinating the health and safety approach and regularly reviewing applicable school policies, but will also ensure that all workers are consistently updated on changes to policies. This group will coordinate trainings for all key personnel and ensure effective monitoring of risk. It will be required to inform - and, if necessary, hold to account - school leadership in the case of any health and safety crisis.

Health and Safety Risk

The Board and the HSRs will work together to identify and mitigate any potential risks ahead of time and solve them expediently. This will take place in a four step process.

The first process is identifying the key risks and what the possible health impact will be. Every employee at Crimson will be trained on how to escalate concerns, and the Board and HSRs will work together to accurately map and estimate the damage potential. The second step is then assessing the right solutions for these measures. This will consist of implementing control measures that can be implemented quickly and effectively given the available resourcing and time constraints. Again, this will be done in a coordinated effort by the Board and HSRs.

The last step will be maintenance and execution on the control measures. It is the responsibility of the two parties that all solutions be executed and all plans judged by their eventual outcome, not just the quality of the plan. The Board shall give the HSRs the authorization to utilize existing administration resources and re-appropriate labor from other divisions as required to solve urgent health concerns, understands that a safe workplace is of prime importance.

The function of the HSRs in these discussions will not only be to provide an on-the-ground opinion and also source these concerns directly through their day-to-day work, but also to ensure that workers are adequately represented in the discussion about possible solutions. This will ensure that worker health is taken into consideration and that all solutions can be found to work for all parties.

Training

To ensure that Crimson's health and safe procedures are adopted and upheld by all employees, there will be a number of required trainings for all new employees at Crimson who work in physical offices. An abridged version may be required for those employees who work remotely and outside of a traditional physical workplace, where their surroundings are not maintained or monitored by Crimson.

These trainings will include:

- Discussion of the risks and hazards in the work area
- Appropriate risk control measures
- How to report health and safety incidents in the workplace
- Harassment and bullying identification and reaction training
- HSR policies and how to contact
- Fire drills / CPR

Completion of training will be closely monitored and all teachers will be held accountable for completing these trainings prior to beginning at school. They will be re-evaluated and re-taught on a regular basis to ensure that the same quality standards are kept from year to year.

Policy Review

While the above commentary notes some of the important measures that Crimson will be instituting to ensure compliance with the requirements for the 2014 Vulnerable Children's Act, there are a couple of other important steps that will be taken by the school with specific respect to the Act itself:

First, Crimson will post this Child Protection Policy (incorporating all subsequent revisions) on its website and available for all parents and students to read. Before anything is posted, the CPP will have to be approved by the Board of the Crimson Online Academy prior to launch. Although the 2014 VCA stipulates that the policy will need to be reviewed every three years, Crimson will have its Board review the policies annually to ensure that it remains effective and update. In doing so, the Board will work directly with school leaders in the process of creating the initial draft, and when working on improvements, will be soliciting feedback from parents and students on both a direct and anonymous basis.

To the latter point, the establishment of the CPP will include the creation of anonymous reporting channels so that any member of the school can report violations of this policy to the highest level. This can come from not only students or parents, but also any staff members who view actions they believe could lead to child abuse or neglect. In line with our Key Principles, these channels will remain open and there will be independent monitors who communicate this feedback to the Board to protect confidentiality. Further, The Board will create a sub-committee which will deal specifically with these reports, working hand-in-hand with school liaisons but also establishing a separate, independent body to review issues where the school may be compromised (e.g. top executives are accused of not having obeyed the policy).

To get advice from independent entities, both members of the child support group Frontline and NZSTA advisers will be brought into this creation process so that their consultations are given serious weight in the policy discussions and Crimson can be leveraging their institutional knowledge during the creation of all these important policies. A relevant retrospection on the largest child safety incidents of the last year (and how the current policy either sufficiently addressed or failed to address those concerns) will be another key part of the annual review process.

In line with the expectations of the VCA, this public policy will be part of the initial induction for all staff members (see above) and a required component of the training for each student. Crimson will ensure that the CPP will be enforced rigorously at every turn, with staff members being given direct support from Crimson to ensure that they take any learning & development courses required to be able to support it in all of their interactions with students.

Other Policies

Confidentiality and Information Sharing

Using the New Zealand Privacy Act 1993 and the Children, Young Persons, and Their Families Act 1989 (CYPF Act) as guides, information is to be shared to keep children safe in the event of abuse or self-injury.

Generally, advice should be sought from Child Welfare and/or the Police before information about an allegation that may identify an individual is shared with anyone, other than the appropriate supervisor/manager.

Under sections 15 and 16 of the CYPF Act, any person who believes that a child has been, or is likely to be, harmed physically, emotionally or sexually, or ill-treated, abused, neglected or deprived may report the matter to Child Welfare or the Police and, provided the report is made in good faith, no civil, criminal, or disciplinary proceedings may be brought against them.

Recruitment and Employment (safety checking)

Our recruitment policy reflects a commitment to child safety by including comprehensive screening procedures. This includes appropriate interview questioning, police vetting and reference checks.

Professional Development & Support

Crimson is committed to ensuring that it builds the capability and provides the appropriate resources and support, to all staff. The underlying principle is that staff will have the necessary skills consistent with the scope of their work/role. Crimson staff will be required to undertake an online module as part of their training before interacting with children.

The appropriate level of additional training, resources and support required will vary depending on:

- + The amount of contact the staff member has with children
- + Whether the staff member is likely to be expected to provide support to others who suspect child abuse or neglect.

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Monday, 15 July 2019 3:17 p.m.
To: Ken White
Cc: Jamie org>; d.freed@crimsoneducation.org
Subject: Oranga Tamariki

Hi Ken

The recent document from Crimson regarding the OHS referred to Child, Youth and Family. This nomenclature has since changed and the Act and service is now under Oranga Tamariki Act 1989 No 24. In addition the Children's Act 2014 referred to in the document should have been referenced covering core and non-core workers.

I will get David Freed to amend these in the document.

Do you have a timeframe for possible registration?

Regards

John

John Morris MA(Hons) ONZM | Morris Consulting

Cell: s 9(2)(a)

E: John.morris@morrisconsulting.co.nz



MEMO

To: Sandra Orr, Regional Infrastructure Manager
From: Liona Blair, Property Advisor
Cc: Jayne Taylor-Clarke, Infrastructure Manager
Date: 30/07/2019
Subject: Private Schools Checklist approval

Purpose:

This memo seeks your approval/endorsement of the attached Private Schools Checklist.

Background:

Crimson Online are seeking registration as an educational provider with the Ministry of Education. They are primarily an online based educator. They will be utilising the already existing Eduexperts premises in Newmarket as and when required for their students to sit external assessments.

Attached are copies of the sites current BWOFF and response from Auckland Council's planning department that under Auckland's Unitary Plan running an educational facility in Business-Metropolitan Centre Zone is a permitted activity.

There is no code of compliance certificate as no consented works were carried out for Crimson Online, they are utilising the already approved Eduexperts site.

Recommendation:

Recommend approval.

Private Schools Checklist - Building Inspection



To be completed by Regional Infrastructure staff

School name: School number:

School contact: Date of inspection: / / DD/MM/YYYY

BWOF	<input checked="" type="radio"/> Yes <input type="radio"/> No	Date issued	<input type="text"/> / <input type="text"/> / <input type="text"/>	DD/MM/YYYY
Code Compliance Certificate	<input type="radio"/> Yes <input checked="" type="radio"/> No	Date issued	<input type="text"/> / <input type="text"/> / <input type="text"/>	DD/MM/YYYY
Resource Consent	<input type="radio"/> Yes <input checked="" type="radio"/> No	Date issued	<input type="text"/> / <input type="text"/> / <input type="text"/>	DD/MM/YYYY

Attach copies of final sign-off

Roll

Current roll	No. classrooms	No. specialist rooms	Gym/hall
<input type="text" value="50"/>	<input type="text" value="6"/>	<input type="text"/>	<input type="text"/>

List roll by year

Y0	Y1	Y2	Y3	Y4	Y5
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Y6	Y7	Y8	Y9	Y10	Y11
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Y12	Y13				
<input type="text"/>	<input type="text"/>				

Fire Safety and Design

Does the fire safety and design meet Building Code requirements?

Yes No

If no, state why

- Emergency plan
- Evacuation areas
- Access ways
- Smoke detectors
- Sprinkler system

Building fire rating:

Fire alarm system (Type):

Environment

Do the classrooms meet Building Code requirements for interior environment?

Yes No

Comments

Classrooms have natural light, heating and cooling devices, natural ventilation.

Lighting

Strip lights

Heating source

Heatpump

Glazing

Single

Staff facilities

Staffroom area

Sick bay

Teacher areas

Administration

Toilets

Compliant with Building Code requirements?

Yes No

No. Male

2

No. Female

2

No. Staff

Accessible toilet?

Yes No

Outside areas

Area of playground (sqms)

Covered outside area?

Yes No

Fields

Yes No

If no, where is physical education curriculum taught?

Tutoring service in academic subjects not full time students

Parking

No. of carparks

6

Traffic Management Plan?

Traffic flows marked one way direction?

Off street drop off and pick up?

Bus way separate from car park?

Safe egress and ingress for children?

Comments

Entranceway leads out to car park where students are dropped off by parents or make their own way there, entrance is off main street.

Approval

Checked by

Consultant's name

Consultant's company

Signature

 / /

DD/MM/YYYY

Date

Liona Blair

Property Advisor name

 L Blair

Signature

 30 / 07 / 2019

DD/MM/YYYY

Date

 Scott Orr

Regional Infrastructure Manager name

 S Orr

Signature

 20 / 08 / 2019

DD/MM/YYYY

Date

Copy of report sent to

ECP Senior Advisor name

Signature

 / /

DD/MM/YYYY

Date

Liona Blair

From: John Morris <john.morris@morrisonconsulting.co.nz>
Sent: Tuesday, 30 July 2019 9:37 a.m.
To: Liona Blair
Cc: Jamie org>; d.freed@crimsoneducation.org; Sharndre Kushor; Ken White
Subject: Crowhurst St

Hi Liona

I have been liaising with Jenny Jin from EduExperts and she has been to see the Auckland Council re your request. The advice she has received from the Council is below:

To confirm the advice given.

Under the Unitary Plan the definition of Education facility is defined as:

“Facility used for education to secondary level. Includes:

- schools and outdoor education facilities; and*
- accommodation, administrative, cultural, religious, health, retail and communal facilities accessory to the above.*

Excludes:

- care centres; and*
- tertiary education facilities.*

This definition is nested within the Community nesting table”

Under the Auckland Unitary Plan (Operative in Part), it is a permitted activity to have educational facility in Business – Metropolitan Centre Zone however you must comply with all the standards.

Please also be aware that the property is also subjected to numerous overlays such as Regionally Significant Volcanic Viewshafts and Height Sensitive Areas, and you need to comply with other relevant chapters from AUP(OP)

Ngā mihi I Kind Regards

Eddie Ng | Graduate Planner

Central Resource Consenting

Email: **9(2)(a)** [@aucklandcouncil.govt.nz](mailto:9(2)(a)@aucklandcouncil.govt.nz)

Auckland Council, Level 2 East, [35 Graham Street](#), Auckland

Visit our website: www.aucklandcouncil.govt.nz

Can I assume that this covers your request and that the property is compliant.

Regards
John

John Morris MA(Hons) ONZM | Morris Consulting
Cell: **9(2)(a)**
E: John.morris@morrisconsulting.co.nz

Released under the Official Information Act 1982

**Building Warrant of Fitness
Form 12 Section 108: Building Act 2004**

Expires: 30/5/2020

Building Name:
Unit/Level No:
Street Address: **25 – 27 Crowhurst St, Newmarket, Auckland**
Location of Building within site/block number: Rear building on site
Legal Description: **Lot 1 DP 53415**

Compliance Schedule # **HCS/94/00643** Year Constructed:
Highest Fire Category Rating: **1** Purpose Group: **WL**
Current, lawfully established use: **Offices/Accommodation**
Max Occupancy:
Intended life of building if 50 years or less: **Indefinite, not less than 50 years**

Name of Owner: **Liu & Lin Trust Partnership**
Postal Address: **9(2)(a)**

Name of Agent: **FacilityWorx Ltd**
Postal Address: **105 Preeces Point Road, Coromandel 3506**
Contact: **Jan Macdonald PH 9(2)(a)** Email **facilityworx@gmail.com**

Specified Systems

- SS 2 Emergency Warning System for fire or other danger**
- SS 3/2 Access Controlled Doors**
- SS 4 Emergency Lighting System**
- SS 8/1 Passenger Lifts**
- SS 9 Mechanical Ventilation and/or air conditioning**
- SS 13/1 Mechanical Smoke Control**
- SS 14/1 Signs for systems 1 – 13**
- SS 15/2 Final Exits**
- SS 15/3 Fire Separations**
- SS 15/4 Signs communicating information intended to facilitate evacuation**

The inspection, maintenance and reporting procedures of **Compliance Schedule # HCS/94/00643** have been fully complied with for the 1 month prior to the date of issue.

The Compliance Schedule Records are located on site

Signature of Owner/Agent.....  FacilityWorx Ltd – Ref 128/28

Relationship to Owner – Duly Authorised Agent

Date: 18/6/2019

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Monday, 15 July 2019 3:17 p.m.
To: Ken White
Cc: Jamie org>; d.freed@crimsoneducation.org
Subject: Oranga Tamariki

Hi Ken

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John

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Ngā mihi I Kind Regards

Eddie Ng | Graduate Planner

Central Resource Consenting

Email: 9(2)(a) [REDACTED]@aucklandcouncil.govt.nz

Auckland Council, Level 2 East, 35 Graham Street, Auckland

Visit our website: www.aucklandcouncil.govt.nz

Can I assume that this covers your request and that the property is compliant.

Regards
John

John Morris MA(Hons) ONZM | Morris Consulting

Cell: 9(2)(a) [REDACTED]

E: John.morris@morrisconsulting.co.nz

Released under the Official Information Act 1982

Ken White

From: John Morris <john.morris@morrisconsulting.co.nz>
Sent: Tuesday, 6 August 2019 10:46 a.m.
To: Ken White
Subject: Progress

Hi Ken

Just wondering if there is any progress with the Crimson OHS private school registration.

I had another query from Liona which I sorted re the EduExperts property and she said she would get the tick off from her boss and then pass on to you. So I am hopeful of a quick resolution.

Anything I can pass on to Jamie would be helpful.

Thanks Ken

Cheers

John

John Morris MA(Hons) ONZM | Morris Consulting

Cell: s 9(2)(a)

E: John.morris@morrisconsulting.co.nz

Released under the Official Information Act 1982



23 August 2019

Shandre Kushor
Crimson Online Academy
C/o The Parnell Centre
Level 3
125 St. Georges Bay Road
Parnell
Auckland 1052

Dear Shandre

Provisional Registration – Crimson Online Academy

In accordance with the provisions of sections 35A to 35R of the Education Act 1989, I am pleased to advise you that your application for provisional registration as a secondary school (Year 9-13) has been approved as of 18 February 2020. This provisional registration will lapse on 18 February 2021.

As soon as your school begins to operate, please complete the enclosed Information Profile form and return it to Ken White at this office or email ken.white@education.govt.nz. When the Ministry receives your response, it will request the Education Review Office to carry out a review of your school between six and twelve months from the date of your school's provisional registration.

As a provisionally registered school, you are entitled to copies of the curriculum statements relevant to the programmes offered by your school. You should request these from Customer Services, Learning Media Limited, PO Box 3293, Wellington, or you can email your request to orders@learningmedia.co.nz.

I remind you that your school cannot receive Government funding until it becomes fully registered under the Education Act 1989. Government funding is paid on a quarterly basis to fully registered schools.

If you require any further information or advice, please contact Julien Le Sueur, Education Manager on 09 632 9345 or email julien.lesueur@education.govt.nz

I wish you the best for the coming year.

Yours sincerely

Isabel Evans
Director of Education - Auckland

From	General response
Response required by	Urgent-
Information Required	We understand a new on-line school has been provisionally registered.
Notes on response	<p>In April this year we received an application from Crimson Education to establish an online private school, Crimson Online Academy (COA) for Year 9-13 students.</p> <p>Crimson operates globally using a completely online education method. COA intends to offer a version of Cambridge International Education courses from inception to its students.</p> <p>COA plans to open in 2020 initially focussing on Year 11-13 students, and overtime extending classes to include Years 9 and 10. It will not have a physical campus where classes are administered. Instead, COA will teach its students exclusively through online courses that are taught on Crimson's proprietary learning management system.</p> <p>However, COA does see the value of having physical campuses where students are able to interact for academic and extracurricular reasons and proposes to use two centres in Auckland, both located in Newmarket.</p> <p>When considering a private school's registration we take into account the standard of teaching, the way its curriculum is delivered and the regularity of lessons. To gain provisional registration we needed to be satisfied that the standard of teaching would be equal to that provided at state schools. Crimson met the requirements of the Education Act.</p> <p>The school is provisionally registered for 12 months and the Education Review Office (ERO) will carry out a review to inform whether the school's operation is meeting requirements to gain full registration.</p>
Prepared by	Ken White
Spokesperson	
Response	
QA by	

Media Advisor	
Approved	

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