

**RULINGS > PRODUCT | WHAKATAUNGA > WHAKAPUTANGA**

## **Ministry of Education**

Issued | Tukuna: 23 October 2025

**BR Prd 25/06**

The Arrangement is the payment of bursaries that the Ministry of Education makes to eligible student teachers under the Go Rural: Isolated Placements Fund. The bursaries are awarded to student teachers who are hosted in an isolated or rural, state or state-integrated school while completing their Initial Teacher Education programme that is Teaching Council approved.

The Ministry of Education funds the bursaries.

To the extent that a bursary payment the Ministry of Education makes to a student teacher under the Arrangement is income, it is exempt income of the student teacher under s CW 36 of the Income Tax Act 2007.

**START DATE – END DATE | RĀ TĪMATA – RĀ MUTUNGA**

23 October 2025 – 28 February 2029

**(THIS TITLE PAGE DOES NOT FORM PART OF THE RULING. | KĀORE  
TĒNEI WHĀRANGI TAITARA I WHAI WĀHI I TE WHAKATAUNGA.)**

# Product Ruling | Whakataunga Whakaputanga – BR Prd 25/06

This is a product ruling made under s 91F of the Tax Administration Act 1994.

## Name of person who applied for the Ruling | Ingoa o te tangata i tono i te Whakatau

This Ruling has been applied for by the Ministry of Education (the Ministry).

## Taxation Laws | Ture Tāke

All legislative references are to the Income Tax Act 2007 unless otherwise stated.

This Ruling applies in respect of s CW 36.

## The Arrangement to which this Ruling applies | Te Whakaritenga i pāngia e tēnei Whakataunga

The Arrangement is the payment of bursaries that the Ministry makes to eligible student teachers under the Go Rural: Isolated Placements Fund (Go Rural Bursary) programme.

The Ministry funds the bursaries.

The following paragraphs set out further details of the Arrangement.

## Background

- 1) The Go Rural Bursary is a government-funded initiative that the Ministry administers. It funds places in school-based Initial Teacher Education (ITE) programmes in rural or isolated areas. This gives student teachers the opportunity to gain experience in rural or isolated settings and build relationships with rural or isolated schools while working towards their teaching qualification.
- 2) Completing a school placement is an important part of a student teacher's ITE programme. Often student teachers attending placements in rural or isolated schools face greater costs than when they are placed in schools nearer their ITE provider. The Go Rural Bursary is intended to support student teachers to undertake placements at rural or isolated schools in the final year of their ITE programme.

- 3) The bursary is a \$4,000 lump sum payment that the Ministry makes directly to eligible student teachers.
- 4) The Ministry intends to implement the Go Rural Fund programme in the 2025/26 June financial year. Applications will be made available from 1 March 2026.
- 5) For the 2025/26 financial year, 123 funded places are available across 454 state and state-integrated schools with an isolation index of 1.27 or higher.
- 6) The value of the bursaries and the number of funded places available may change in later years. However, the bursary recipients will always be subject to the eligibility criteria and terms and conditions outlined at [9]).
- 7) A student teacher can use the bursary payment to pay fees for the ITE programme they are enrolled in, as well as living costs (eg, accommodation, transport and childcare) and course-related costs (eg, materials and equipment).
- 8) A recipient of another bursary or scholarship that the Ministry provides may also apply for the Go Rural Bursary if they meet the eligibility criteria.
- 9) To be eligible for a Go Rural Bursary, an applicant must be:
  - a) enrolled in a Teaching Council-approved primary or secondary ITE programme, leading to teacher registration;
  - b) in their final year of their ITE study;
  - c) attending a placement at a state or state-integrated school with an isolation index of 1.27 or higher;
  - d) attending a placement that is at least 25 days in length; and
  - e) a New Zealand citizen or New Zealand permanent resident.
- 10) Recipients may be awarded a Go Rural Bursary once only.
- 11) The bursary does not include any arrangements for employing the student teacher with the Ministry or placement school.
- 12) The bursary does not include any bonding arrangements between the student teacher and the Ministry or placement school.
- 13) Recipients are under no obligation to provide any services to the Ministry for the payment of the bursary.

## How the Taxation Law applies to the Arrangement | Ko te pānga o te Ture Tāke ki te Whakaritenga

The Taxation Law applies to the Arrangement as follows:

(a) To the extent a bursary payment the Ministry makes to a student teacher under the Arrangement is income, it is exempt income of the student teacher under s CW 36.

## Period or income year for which this Ruling applies | Te wā, te tau moni whiwhi rānei i pāngia ai e tēnei Whakataunga

This Ruling will apply for the period beginning on 23 October 2025 and ending on 28 February 2029.

This Ruling is signed by me on the 23<sup>rd</sup> day of October 2025.

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**Amy McGimpsey**

Group Lead | Kaihautū ā-rōpū

Customer Compliance Services | Ratonga Kiritaki me te Tautukunga

## About this document | Mō tēnei tuhinga

Product Rulings are issued by the Tax Counsel Office and Customer and Compliance Services. Product Rulings set out the Commissioner's view on how tax laws apply to a particular "product" – which is an arrangement that a specified taxpayer is likely to enter into with a number of people on identical terms. Taxpayers who enter into the arrangement described in a Product Ruling may apply the ruling but are not obliged to do so. Product Rulings are binding on the Commissioner. This means that if you are entitled to apply a Product Ruling and you have calculated your tax liability in accordance with the ruling, the Commissioner must accept that assessment. A Product Ruling applies only to the taxation laws and arrangement set out in the ruling, and only for the period specified in the ruling. It is important to note that a general similarity to an arrangement covered by a Product Ruling will not necessarily lead to the same tax result.