CATHOLIC EDUCATION
WESTERN AUSTRALIA

The compliance audit of St Bernard's School was completed on 22 May 2019 by Tom Campbell, School Registration Compliance Consultant. The school's compliance was assessed against the Registration Standards for Non-Government Schools in Western Australia and other system requirements through the process indicated in the table below.

SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
List: • application documentation reviewed • information collected from the school, • observations, meetings, interviews • any other sources.	• Analysis of the evidence collected. • Assessments about the information against the standard or other requirement. • Narrative indicating areas of compliance and non-compliance and associated level of risk.	• Consultant conclusions on school compliance with the standard or in meeting other requirements. • Matters to be addressed. • Conclusions inform the reasons for any limitation imposed. • Conclusions must be consistent with assessment of the evidence and the Risk Profile ratings.

CAPACITY TO MANAGE RISKS
If concerns are identified for any standard or requirement, the associated capacity is to be completed. Evidence demonstrating: • compliance history • skills, qualifications and experience of governing body members and school leaders • training provided for governing body members particularly on their education and care responsibilities • that the governing body makes the best interests of the school its primary consideration • engagement with the school and wider community other relevant matters Analysis of: • capability to manage risks • willingness to manage risks constraints on capacity Impact of capacity assessment on risk rating for each standard/requirement.

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT

STANDARD 1: CURRICULUM

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
1.1	*Curriculum for students in the final year of their early education period, known as Pre-Kindergarten, and in their pre-compulsory education period, known as Kindergarten, is consistent with the principles, practices and learning outcomes of Belonging, Being and Becoming – The Early Years Learning Framework.*	• Curriculum plan • SIP • Strategic Plan • Interviews • Classroom visits	• The school implements the *Early Years Learning Framework – Belonging, Being and Becoming* • The school has conducted an National Quality Standards audit and have incorporated their focus areas into their Quality Improvement Plan	**Meets the standard**
1.2	*Curriculum for students in the first to eleventh years of their compulsory education period, known as Pre-Primary to Year 10 inclusive, is:* *(a) approved, accredited or recognised by the School Curriculum and Standards Authority; or* *(b) a programme of study meeting the needs of the student delivered through an Individual Education Plan.*	• Curriculum plan • SIP • Strategic Plan • Assessment schedule • Interviews	• Western Australian Curriculum is implemented • IEPs and CAPs are in place	**Meets the standard**
1.3	*Curriculum for students in the twelfth and thirteenth years of their compulsory education period or above as permitted by law, known as Years 11 and 12:* *(a) enables all students to achieve a Western Australian Certificate of Education (WACE) or Cambridge International A Levels or International Baccalaureate Diploma or another qualification approved by the Director General; and/or* *(b) provides a programme of study meeting the needs of an individual student delivered through an Individual Education Plan.*	• Not applicable	• Not applicable	**Not applicable**
CAPACITY TO MANAGE RISKS				
• Not applicable				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• What curriculum does the school implement? Is it the SCSA approved curriculum? • What is used to monitor student achievement? • What strategies are used for students who require a modified curriculum? • Does the school regularly review and revise IEPs and CAPs? Do students on a modified curriculum show improvement? • Do all students feel supported and encouraged in their learning?	• St Bernard's School, KOJONUP – 2019 Curriculum Plan • St Bernard's School, KOJONUP – Curriculum Plan Assessment • Standard 1 – Records of Assessment of student needs and adjustments	• The principal, who is relatively new to the position, is keen to implement whole school 'best practice' strategies. Effective support from a staff member who is essentially fulfilling a coaching role should ensure that this is enabled. Support from curriculum consultants would be invaluable. Given the principal is new to the position mentoring support is also desirable. The leadership team has the capacity to implement the changes in curriculum delivery required. • Discussions with principal and teaching coach on curriculum implementation, teaching strategy emphases and data analysis. • Effective differentiation within classrooms should also be investigated. • Coaching support from lead staff member appears very effective and could be a vehicle to facilitate this. • Continued support from curriculum consultants is recommended. • Data analysis is thorough. • Assessment schedule is detailed. • Effective coaching support with a focus on literacy is provided for teachers. • Multilit is being used successfully as an intervention strategy. • Current leadership team has endeavoured to include whole school 'best practice' strategies in classrooms. At this point, not all staff are engaged in the change.

		• Current leadership team has endeavoured to include whole school 'best practice' strategies in classrooms. At this point not all staff are engaged in the change.
		• Resourcing is sufficient to support curriculum delivery.
		• Areas for Improvement derived from NQS audit are being actioned.
		• Visits to other schools to view 'best practice' have been undertaken.
		• Positive change to the delivery of curriculum is in early stages with not all staff implementing the policies and strategies being proposed.
		• An Aboriginal Educational Plan should be developed as soon as possible.

STANDARD 2: STAFF TO STUDENT RATIOS

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
2.1	*In classes for students in their compulsory education period, staff to student ratios are sufficient to provide a satisfactory standard of education and care to each of the students enrolled or to be enrolled.*	• Class lists • Enrolments	• Staff student ratios provide appropriate delivery of curriculum and support to students.	**Meets the standard**
2.2	*In classes for or including students in the final year of their early education period and/or in their pre-compulsory education period, unless otherwise approved by the Director General and subject to standard 4.2(a):* *(a) the staff to student ratio is one staff member, working directly with the students, to a maximum of 10 students. Staff may take breaks of up to 30 minutes per day 'off the floor'. Throughout the break the staff must remain on the school premises and be immediately available to assist if required. In planning staff breaks, adequate supervision must be maintained at all times and the overarching consideration must be the needs of the children;* *(b) at least one early childhood teacher is present for every 30 students or fewer; and* *(c) an early childhood teacher is in attendance at all times that students are present.*	• Class lists • Enrolments • Duty roster • Class visit	• Compliant	**Meets the standard**
CAPACITY TO MANAGE RISKS				
• Not applicable				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Analysis of student enrolment data and staff allocations • Analysis of staff qualifications (as contained in the Staff Declarations under *Standard 4: Staff*)	• St Bernard's School, KOJONUP – Enrolments (February 2019 COSI) • Standard 2 – DUTY ROSTER S1 T1 Wk 7 2019 • Standard 2 – KGC21003_Class List with Columns • Standard 2 – ST21041_Students by School Year & Roll Group	• A tour of the school confirmed the adequacy of staff to student ratios

STANDARD 3: DAYS AND HOURS OF INSTRUCTION

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
3.1	*Unless otherwise approved by the Director General and subject to standard 3.2, the school provides at least the minimum hours of instruction prescribed for government schools.*	• Term dates • School timetable	• The school is meeting the requirements	**Meets the standard**
3.2	*For students in the final year of their early education period, known as Pre-Kindergarten, the hours of instruction in each school week do not exceed 25 hours and 50 minutes.*	• School timetable	• The school is meeting the requirements	**Meets the standard**
CAPACITY TO MANAGE RISKS				
• Not applicable				

	Start date	Finish date	Total number of school days
Term 1	4 February 2019	12 April 2019	48
Term 2	29 April 2019	5 July 2019	48
Term 3	22 July 2019	27 September 2019	48
Term 4	14 October 2019	13 December 2019	44
		TOTAL	**188**

	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12
Hours of instruction per week	27.5	27.5	27.5	27.5	27.5	27.5

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Not applicable – calculated prior to school visit	• Standard 3 – Specialist timetable • Standard 3 – Term Calendar Term 1 2019	• Not applicable – calculated prior to school visit

STANDARD 4: STAFF

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
4.1	*The school ensures all staff and volunteers are compliant with the requirements of the Working with Children (Criminal Record Checking) Act 2004, Working with Children (Criminal Record Checking) Regulations 2005, Teacher Registration Act 2012 and Teacher Registration (General) Regulations 2012.*	• Staff declarations	• All staff have current WWC checks and TRBWA registration as required.	**Meets the standard**

4.2	*In each class for or including students in the final year of their early education period and/or in their pre-compulsory education period, unless otherwise approved by the Director General:*
	(a) each teacher is an early childhood teacher. In the event of the absence of an early childhood teacher:
	  i. if the absence totals no more than 60 days in a school year or is due to the teacher's resignation, his or her place may be filled by a primary-qualified teacher for the remainder of the school year;
	  ii. in all other cases, the teacher's place must be filled by an early childhood teacher;
	(b) at least 50% of the staff required to meet the staff to student ratio hold, or are actively working towards, at least an approved Diploma level education and care qualification (the teacher or teachers can be included in this 50%) and all other staff required to meet the ratio hold, or are actively working towards, at least an approved Certificate III level education and care qualification;
	(c) there are staff on the premises with the following: a current approved first aid qualification; current approved anaphylaxis management training; and current approved emergency asthma management training; and
	(d) a record is kept of the person responsible for each class at any time and who was working with the students at any time.
		• Staff declarations
		•
			• The school has adequate numbers of early childhood teachers and education and care assistants **(Standard 4.2(a) and (b))**
			• The Principal has arranged for staff training in first aid (including anaphylaxis and asthma management) on 15 May **(Standard 4.2(c))**
			• Every class maintains student attendance records on SEQTA **(Standard 4.2(d))**
			• Action arising: the Principal was required to provide records of staff that had completed first aid, including anaphylaxis and asthma management, training. This has been completed.
				Meets the standard

4.3	*The school implements a Staff Code of Conduct for all staff, including boarding staff if relevant, which:* *(a) includes guidelines on how to comply with it;* *(b) clearly delineates the boundaries between appropriate and inappropriate interactions between students and adults; and* *(c) requires all staff to report objectively observable behaviour which is not permitted by the Code, other than those subject to mandatory reporting obligations, to the principal, a designated senior staff member or the chair of the school's governing body.*	• Staff Code of Conduct • Discussion with staff	• The school has and implements a Staff Code of Conduct for all members of the school community, which includes guidelines on how to comply with it **(Standard 4.3(a))** • The Code of Conduct clearly outlines what constitutes appropriate and inappropriate interactions between students **(Standard 4.3(b))** • The Code of Conduct requires all staff to report objectively observable behaviour not permitted by the Code **(Standard 4.3(c))**	**Meets the standard**
4.4	*The school provides all new staff, including new boarding staff if applicable, as soon as practicable following their appointment, an induction covering:* *(a) the Staff Code of Conduct;*	• Staff induction procedures • Staff declarations • Staff induction schedule • Discussion with new staff member	• A new graduate teacher noted they had not undergone the full induction process. • The interim feedback recommended that the Principal ensure all staff have received an induction covering the Staff Code of Conduct	**Meets the standard**

	(b) staff obligations to report objectively observable behaviour which is not permitted by the Code; (c) the school's policies and procedures for the prevention, detection and reporting of suspected and actual grooming and sexual abuse; (d) the mandatory reporting obligations of teachers and boarding supervisors; and (e) all other school policies and procedures.		• (including obligations to report breaches), CEWA Child Protection Procedures (Mandatory Reporting) training, and all other school policies and procedures. • This has been completed as of 27 September.	
4.5	The school ensures all staff: (a) participate in regular performance management procedures and professional learning linked, where appropriate, to the Professional Standards for Teachers in Western Australia and to the school's processes for improving student learning; and (b) participate in professional learning covering the Staff Code of Conduct, their mandatory reporting obligations and all school policies and procedures at least biennially.	• Staff performance management policy and procedures • Staff professional learning records • Mandatory reporting training records	• The staff handbook states that Staff Meetings and Professional Learning Community Meetings (PLCs) are held alternative Wednesdays; all staff are required to attend • The staff handbook contains some provisions around professional development • The school has a professional development policy; it requires all teachers to observe their professional requirements, including TRBWA registration • Professional learning focusing on Code of Conduct and mandatory reporting takes place as required by regulation • The interim feedback recommended that the Principal provide a schedule of professional learning for all staff for the year, and ensure that all professional learning and performance management is recorded. • The interim feedback recommended that the Principal ensure all staff have current CEWA Child Protection Procedures (Mandatory Reporting) training. • This has been completed as of 27 September.	**Meets the standard**

CAPACITY TO MANAGE RISKS

• Not applicable

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT

• Do all staff and volunteers comply with the legal requirements of the *Working with Children (Criminal Record Checking) Act 2004, Working with Children (Criminal Record Checking) Regulations 2005, Teacher Registration Act 2012* and *Teacher Registration (General) Regulations 2012*?
• Does the school maintain current records of staff and volunteer WWC checks and TRBWA registration?
• Are there staff on site that are trained in first aid, anaphylaxis and asthma management?
• Does the school maintain attendance records that show staff responsible for students at all periods throughout the school day?
• Does the school have a Staff Code of Conduct?
   o Does it include guidelines on how to comply with it?
   o Does it delineate boundaries for appropriate and inappropriate interactions between children and adults?
   o Does it require breaches of the Code to be reported to a senior member of staff, the Principal or CEWA?
• Does the school's induction process cover training in:
   o the Staff Code of Conduct?
   o staff obligations to report objectively observable behaviour prohibited by the Code?
	• Code of Conduct Full Version – Staff, parents, volunteers, guardians
	• New Staff Employment Procedure
	• Screening Induction Information
	• ST BERNARD STAFF CONTACTS 2016 List of Names
	• St Bernard's New Staff Checklist
	• Staff Declarations Signed
	• Staff handbook 2019
	• Staff Induction Schedule
	• Standard 4 – Anaphylaxis Training
	• Standard 4 – WWC checks
		• See comments under 'Analysis' section.

<li type="circle">school policies and procedures in child protection? <li type="circle">mandatory reporting obligations for teachers? <li type="circle">all other school policies and procedures? - Does the school ensure all staff participate in regular performance management? Is this linked to the AITSL standards and the school's processes for improving student learning?		

STANDARD 5: PREMISES

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
5.1	*The premises are safe, well-maintained, sufficient and appropriate for the delivery of the curriculum to students in the year levels for which the school seeks registration or has been registered and for the number of students enrolled.*	• School tour • OHS certificate	• The grounds and buildings are in excellent condition. • New Nature Play area is an added attraction for ECE students. • An OHS officer has been appointed. • The interim feedback recommended that the Principal ensure the OHS representative conducts a safety assessment of the use of tricycles on the granite stone pathway. • This has been completed as of 27 September.	**Meets the standard**
5.2	*Unless otherwise approved by the Director General, premises built or commissioned since August 2012 for the delivery of educational programmes to students in the final year of their early education period and/or their pre-compulsory education period provide 3.25 square metres of unencumbered indoor space for each student and at least 7 square metres of unencumbered outdoor space for each student.*	• School tour	• Indoor and outdoor areas for students provide for very effective delivery of the curriculum.	**Meets the standard**
5.3	*Where applicable, the premises used by and for boarding students are appropriate, safe, well-maintained and sufficient for the number accommodated.*	• Not applicable	• Not applicable	**Not applicable**
CAPACITY TO MANAGE RISKS				
The principal will follow-up this concern				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Maintenance schedule up to date? • Do the premises provide a safe learning environment? • Are the premises accessible for all students? • Upgrades likely	• Standard 5 – OH & S Certificate – Martie Davies • Standard 5 & 11 Harassment & OHS Officers	• Of some concern which may need follow-up is the positioning of granite stones along a pathway which is used by students on tricycles. • Recommendation: The safety of using the tricycles warrants investigation by OHS officer.

STANDARD 6: FACILITIES

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
6.1	*The facilities used by the school, including vehicles if any, are fit for purpose, safe, hygienic, well-maintained, sufficient and appropriate for the delivery of the curriculum to students in the year levels for which the school seeks registration or has been registered and for the number of students intended to use them.*	• Maintenance schedule • Evacuation and lockdown procedures	• All facilities are maintained in good condition. • New Nature Play area is an added attraction for ECE students. • Evacuation and lockdown practices are held. • Evacuation plans displayed in classrooms.	**Meets the standard**
6.2	*The school provides such ancillary support as is necessary to ensure equity of access to educational programmes for all students enrolled.*	• Staff lists • Class visits	• Adequate ancillary staff support provided.	**Meets the standard**
CAPACITY TO MANAGE RISKS				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Evacuation and lockdown procedures. • Suitability of resources • Observation of facilities in classrooms • Investigate evacuation and lockdown procedures and practices • Is furniture appropriate for use? • Maintenance schedule	• 17 St Bernard's Schedule of Maintenance Plan • EVACUATION PROCEDURES 2019 • Lockdown procedures	

STANDARD 7: CHILDREN PER YEAR LEVEL

The number of students in each year level is sufficient to sustain delivery of the approved curriculum and provide the necessary ancillary support.

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
7.1	*The number of students in each year level is sufficient to sustain delivery of the approved curriculum and provide the necessary ancillary support.*	• Class lists • Projected enrolments	• Delivery of curriculum will be sustained with current numbers.	**Meets the standard**
	CAPACITY TO MANAGE RISKS			

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
	• St Bernard's School, KOJONUP – Enrolments (February 2019 COSI) • Standard 7 – ST21041_Students by School Year & Roll Group	

STANDARD 8: ENROLMENT AND ATTENDANCE PROCEDURES

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
8.1	*Student enrolment and attendance procedures and practices comply with all legal requirements including the prohibition of unlawful discrimination.*	• Enrolment policy	• All enrolment procedures correctly followed.	**Meets the standard**
8.2	*A CARE school documents and retains on record the basis for each decision that a student enrolled was or is at educational risk.*	• Not applicable	• Not applicable	**Not applicable**
CAPACITY TO MANAGE RISKS				
• Not applicable				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Tracking of missing students • Enrolment and attendance policies • Attendance and enrolment procedures	• School Fees • Standard 8 – Enrolment Policy • Standard 8 – ST21480 Student Enrolment Register	• Not applicable – able to be calculated prior to the site visit

STANDARD 9: CRITICAL AND EMERGENCY INCIDENTS

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS

9.1	*The school has and implements a critical and emergency incidents policy and procedures which:*
	(a) define critical and emergency incidents consistently with these standards;
	(b) require all critical and emergency incidents to be reported and documented;
	(c) enable and require the Principal to notify the governing body of all critical and emergency incidents;
	(d) enable and require critical and emergency incidents to be managed in such a way as to give highest priority to the best interests of the student or students affected.
		• Interviews
		• Crisis Management Policy.
			• The school's Crisis Management Plan:
			  o defines critical and emergency incidents in accordance with the Standard **(Standard 9.1(a))**
			  o requires all critical and emergency incidents to be reported and documented **(Standard 9.1(b))**
			  o enables and requires the Principal to notify CEWA of all critical and emergency incidents **(Standard 9.1(c))**
			  o enables and requires all incidents ot be managed in a way that prioritises the best interests of the student(s) affected **(Standard 9.1(d))**
				Meets the standard

9.2	The governing body ensures the Director General is notified as soon as practicable and, in any event within 48 hours of the incident, using the Critical and Emergency Incident Report form, available at *http://www.des.wa.gov.au*.	• Interviews	• The Employee Relations Team at CEWA provided a copy of the last critical and emergency incident report – it occurred during 2017, under a different Principal • However, the current Principal is aware of their reporting obligations and the required procedures to follow • The school board chair advised that the board is comfortable in leaving these matters to the Principal to manage as required	**Meets the standard**

CAPACITY TO MANAGE RISKS
• Not applicable

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Knowledge staff has of critical incident identification and procedures. • Staff awareness of what constitutes a critical incident • Timely reporting of critical incidents • Critical incident register • Board Chair notified?	• Crisis Management Policy 2017 • Excursion Report police station & Kodja place	

STANDARD 10: BOARDING

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
10.1	*Staff employed to supervise the boarders are competent, fit and proper persons, qualified to manage their care, welfare and needs and compliant with the Working with Children (Criminal Record Checking) Act 2004.*	•	•	•
10.2	*The school maintains open and effective communication with the parents and guardians of boarders.*	•	•	•
10.3	*The boarders receive a well-balanced and nutritious diet.*	•	•	•
CAPACITY TO MANAGE RISKS				

LINES OF ENQUIRY	EVIDENCE (documentation – coll... d pre-site vis...	SITE VISIT

STANDARD 11: COMPLAINTS MANAGEMENT

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
11.1	*The school has and implements policies and procedures for receiving and handling complaints, including complaints from students, which are child-friendly, publicised and readily accessible to all members of the school community.*	• Interviews • Dispute and Complaint and Resolution Policy • Complaints Management Register	• Principal is aware of the processes required to ensure complaints process is transparent. • Not all staff members are familiar with procedures.	**Meets the standard**
11.2	*Complaints are handled promptly, objectively, fairly and confidentially, remedies are provided when complaints are upheld and there is a system for review.*	• Parents interview	• Parents confirmed that their concerns were dealt with in a timely and fair manner.	**Meets the standard**
11.3	*Reports, complaints and allegations are recorded in such a way as to enable the detection of any patterns emerging over time.*	• Complaints Management Register	• Complaints are registered. No patterns have emerged.	**Meets the standard**
11.4	*Complaints from former students and/or their parents or guardians are accepted and dealt with in accordance with this standard despite enrolment of the student having ceased.*	• No complaints received	• Principal is aware of obligations.	**Meets the standard**
CAPACITY TO MANAGE RISKS				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Parents- knowledge and understanding of the complaints process. • Do students understand the process? • Complaints register?	• Dispute and Complaint Resolution Policy • Harassment_of_Staff_in_Schools Policy • Standard 5 & 11 Harassment & OHS Officers	•

STANDARD 12: CHILD ABUSE PREVENTION

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
12.1	The school implements policies, procedures, practices and strategies for the prevention of grooming and child abuse, including for boarding facilities if applicable, which are informed by an authoritative and context-appropriate child-safe organisation framework, approved by the governing body, reviewed annually and updated in light of experience and relevant research, including at least: (a) arrangement of all premises and implementation of policies and procedures to deter inappropriate interactions and facilitate detection; (b) staff recruitment practices which: 　• engage only those who are suitable to work with students; and 　• make every attempt to assess commitment to the Staff Code of Conduct on the part of applicants; (c) annual professional learning for all staff on the recognition of grooming and child abuse and appropriate prevention practices and strategies; (d) delivery to all students of a developmentally appropriate protective behaviours curriculum, developed by experts in child abuse prevention, and covering what the boundaries are between appropriate and inappropriate interactions and when, how and whom to tell when a boundary is crossed; (e) a code of conduct for students which sets out minimum standards of conduct, prohibits bullying, harassment and other forms of peer-to-peer abuse and requires respect for the privacy and human dignity of other students and boarders where relevant; and (f) provision of information to parents and guardians about the protective behaviours curriculum, the Staff Code of Conduct, the student code of conduct and when, how and whom to tell when they have concerns about grooming, child abuse or other behavior which is not permitted by either code.	• Protective Behaviours program • Prevention of bullying policy • Discussions with staff, parents and students	• Annual professional learning takes place, and staff are aware of their reporting obligations **(Standard 12.1(c))** • A protective behaviours program has been implemented at the school, however, it could not be confirmed that all staff were implementing the program • Staff have discussed that in 2019 the focus will move to the *Keeping Safe: Child Protection Curriculum* **(Standard 12.1(d))** • The school has a comprehensive behaviour management policy that outlines student behaviour expectations, but it was not developed in collaboration with students, nor is it accessible to them (it is not written in child-friendly language) **(Standard 12.1(e))** • Parents were aware there is a protective behaviours program in place, but were unclear on the contents of it; there didn't appear to be any awareness or understanding of the CEWA Child Safe Framework or the Staff Code of Conduct **(Standard 12.1(f))** In the interim feedback, it was recommended that the Principal: • ensure uniform implementation of a protective behaviours curriculum that meets the requirements of this standard; • support students to develop a student code of conduct that meets the requirements of this standard; and • provide information to parents and guardians about the protective behaviours curriculum, Staff Code of Conduct, student code of conduct, and the procedure for reporting child safety concerns. The Principal confirmed these actions are in progress or completed as at 27 September.	**Meets the standard**
12.2	*Procedures for the detection and reporting of Staff Code of Conduct breaches, grooming and child abuse, at the school or boarding facility if relevant, include at least the following requirements:* (a) that staff must understand and comply with their mandatory reporting obligations; (b) in cases where a former student, or the parent or guardian of a former student, makes an allegation about child sexual abuse at the school occurring before 2009, the *Department of Communities - Child Protection Service* is to be informed immediately; (c) that victimisation of staff, students, parents and guardians for making an allegation in accordance	• Mandatory reporting professional learning register • Discussions with staff • CEWA Mandatory Reporting and Child Protection Procedures • The school Crisis Management Plan	• The school has used the CEWA Code of Conduct template provided; this meets all the requirements of **Standard 12.2** • Staff were aware of their obligations with respect to mandatory reporting **(Standard 12.2(a))**	**Meets the standard**

	with the school's policy, is forbidden, including where the allegation is unfounded; and (d) that the governing body ensures that actual breaches of the Staff Code of Conduct, where there are reasonable grounds to suspect grooming, are reported to the Director General in accordance with *Standard 9.2*.			
12.3	The school responds appropriately to allegations of Staff Code of Conduct breaches, grooming and child abuse in the best interests of students and in accordance with a policy and procedure which at least requires that: (a) the governing body and Principal comply with their legal and professional obligations; (b) in the case of an allegation of grooming or child abuse by current or former staff, the complainant is informed about the services, including advocacy and support services, which may be available; and (c) consultation is undertaken with the relevant government authorities to determine when, what and by whom information related to an allegation of child abuse and its investigation may be given to the person against whom the allegation is made, the complainant and his or her parents/guardian, other affected students and their parents and guardians, and the wider school community.	• Previous breach and/or critical and emergency incident reports • Discussions with staff	• No allegations have been reported since the current Principal has commenced at the school • The previous Principal lodged a critical incident in the correct format **(Standard 12.3(a))** and there was evidence of the supports offered to the student affected and appropriate consultation with government authorities **(Standard 12.3(b) and (c))** • The current Principal and staff are aware of their obligations.		**Meets the standard**

CAPACITY TO MANAGE RISKS

• The Principal is well-placed to implement the recommended changes to ensure compliance with this standard.

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Implementation of Keeping safe: Child protection curriculum • Are parents informed of policy and practice? • What procedures are in place for detecting and reporting grooming? How does the principal and governing body respond? • Is the staff Code of Conduct and child safe school framework reviewed? • Strategies in place for dealing with a breach of the Code of Conduct. • Staff knowledge and understanding of obligations. • Strategies for identifying inappropriate behaviour. • Is the protective behaviours program fully embedded? • What involvement does the governing body have in the process?	• Bullying Policy 2015 • INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)USE BY STAFF • INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)USE BY STUDENTS • Team CPP & Mandatory Reporting (1)	

STANDARD 13: FINANCIAL RESOURCES

PLEASE NOTE: this standard is assessed at a system level – the Catholic Education Commission of Western Australia are responsible for the financial viability of all system schools.

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
13.1	*The school is financially viable.*	• 2019 Initial Budget • 2018 AFS Loans Report • 2019 Forecast Enrolment Change • CCI Insurance Portfolio for 2019 • Interview with school board	• Not applicable	**Not applicable**
13.2	*The school's financial resources are sufficient to enable it to deliver the curriculum for the number of students enrolled in the year levels for which the school is or seeks to be registered and to provide necessary ancillary support.*	• 2019 Initial Budget • 2018 AFS Loans Report • 2019 Forecast Enrolment Change • CCI Insurance Portfolio for 2019 • Interview with school board • School tour	• Not applicable	**Not applicable**
CAPACITY TO IMPLEMENT CHANGE(S)				
• Not applicable				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Not applicable	• 2019 Forecast Enrolment Change – St Bernard's School, KOJONUP • St Bernard's School, KOJONUP – Audit Engagement Letter • St Bernard's School, KOJONUP – Audit Report 2018 • St Bernard's School, KOJONUP – CCI Insurance Portfolio • St Bernard's School, KOJONUP – Financial Audit Report 2018 • St Bernard's School, KOJONUP – Initial Budget 2019	• Not applicable

STANDARD 14: MANAGEMENT OF STUDENTS' BEHAVIOUR

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
14.1	*All students receive positive guidance and encouragement towards acceptable behaviour and are given opportunities to interact and develop respectful and positive relationships with each other and with staff members and volunteers.*	• Behaviour Management Policy • Interviews	• Student behaviour is of a good standard although there is not a coherent process in place with all staff being aware of the whole school approach. • Recommendation: that staff discuss the current policy to ensure the whole school approach is being implemented by all members. • A student code of conduct with a positive emphasis would be desirable. • The interim feedback recommended that the Principal develop a whole-school approach to management of students' behaviour and ensure all staff are aware of the policy and procedures, and are equipped to implement it. • This action has been completed as at 27 September.	**Meets the standard**
14.2	*The use of any form of child abuse, corporal punishment or other degrading punishment is explicitly forbidden, and these terms are defined in accordance with these standards, in appropriate school publications and the Staff Code of Conduct.*	• Behaviour Management Policy • Interviews with staff, students and parents • Class visits	• The Staff Code of Conduct observes all laws, obligations, etc, excluding the use of child abuse, corporal punishment or other degrading punishment. • The interim feedback recommended that the Principal include in the school behaviour management policy and Staff Code of Conduct a provision that explicitly forbids the use of child abuse, corporal punishment and other degrading punishment, and define these terms in accordance with the standard. • This action has been completed as at 27 September.	**Meets the standard**
14.3	*The administration of permitted forms of behaviour management, discipline or punishment conforms to the principles of procedural fairness and the prohibition of unlawful discrimination.*	• Class visits • Interview with parents and students	• Discussions with students revealed some inconsistencies in the implementation of behaviour management plan. They mostly agreed that it was a fair process. • Parents confirmed that they were comfortable with the approach to behaviour management which they believed to be fair and thorough. • The interim feedback recommended that the Principal conduct behaviour management professional development with all staff to ensure uniformity in understanding and application of the policy and procedures. • This action has been completed as at 27 September.	**Meets the standard**

CAPACITY TO MANAGE RISKS

• There is adequate support available to the Principal from the Psychology Team at CEWA to develop a whole-school behaviour management plan, and deliver training to all staff to ensure compliance with this.

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT

• Review the school's behaviour management policy prior to attending the school visit to ensure:
   o it provides students with guidance about how to develop respectful, positive relationships with peers and adults;
   o it explicitly forbids any form of child abuse, corporal punishment or other degrading punishment;
	• Behaviour Management 2017	• See comments in the 'Analysis' section

- it outlines clear processes for the resolution of behaviour issues in the interests of procedural fairness; and - it prohibits unlawful discrimination - Is student behaviour managed appropriately? How does the school do this? - Do students feel like they are given adequate opportunities to interact positively with peers and adults? - Do students feel safe?		

STANDARD 15: MINIMUM AGE OF ENROMLENT

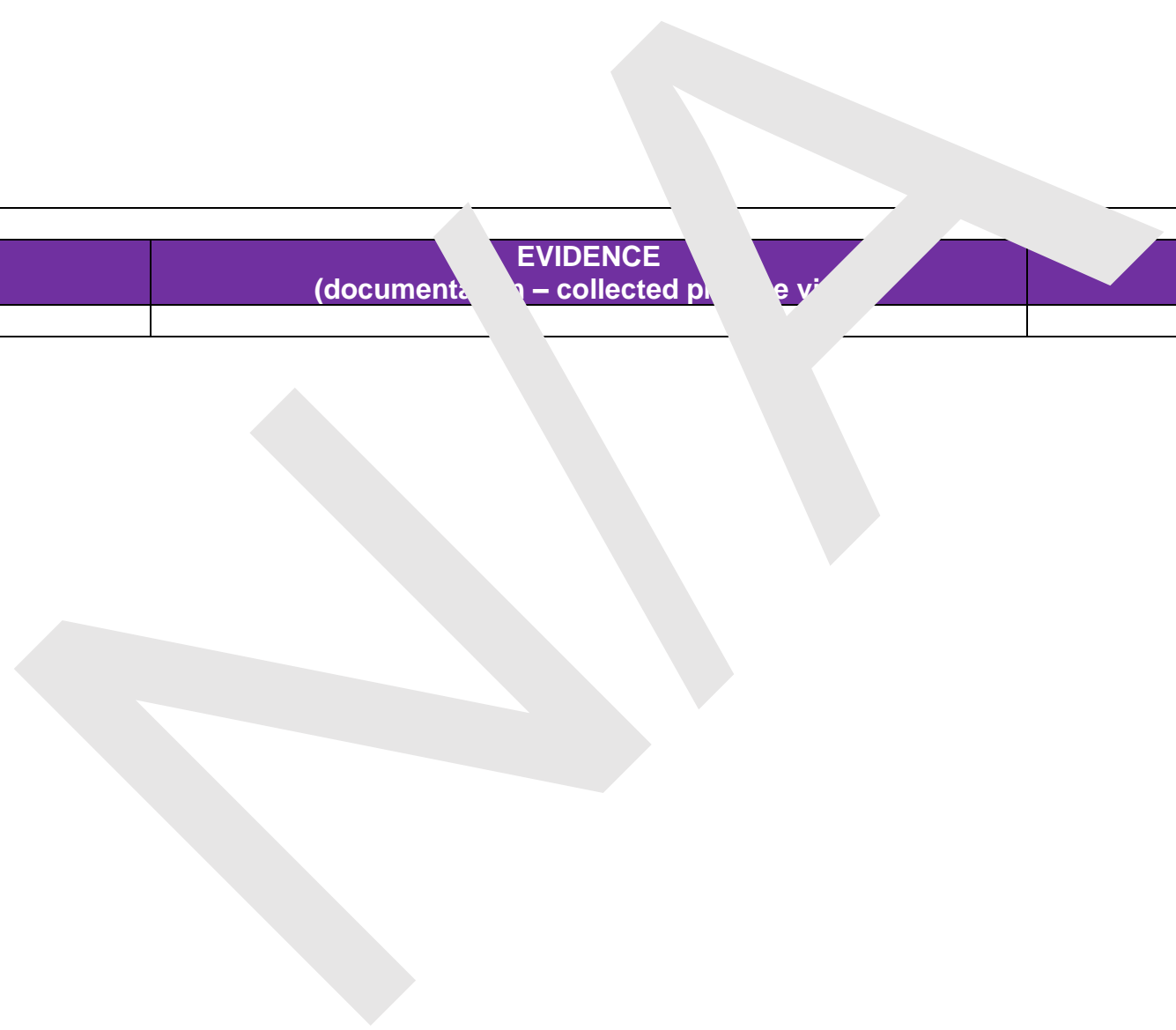|	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
15.1	*Unless the Director General provides approval in advance, the school does not permit any child to be enrolled at the school before the final year of their early education period and the child has turned 3 years of age.*	• Enrolment birth certificates • Enrolment forms	• The school collects birth certificates as part of the enrolment process to confirm no student attends prior to their third birthday.	**Meets the standard**
15.2	*A CARE school does not permit any child to be enrolled before the eighth year of their compulsory education period.*	• Not applicable	• Not applicable	**Not applicable**
CAPACITY TO MANAGE RISKS				
• Not applicable				

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Does the school collect student personal information (e.g. birth certificates, dates of birth) to confirm students are not attending school before their third year?	• Standard 15 – Evidence of enrolment Birth Certs • Standard 15 – Evidence of enrolment Forms	• Not applicable – can be assessed prior to site visit

STANDARD 16: DELIVERY OF THE CURRICULUM

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
16.1	*The provision of educational programmes exclusively by means of online-only learning is restricted to students who are geographically isolated, temporarily living or travelling overseas, participating in elite performance in sport or the arts, or unable to attend at a school due to illness, bail conditions or another special circumstance acceptable to the Director General.*	•	•	•

CAPACITY TO MANAGE RISKS

LINES OF ENQUIRY	EVIDENCE (documenta... – collected p... e vi...	SITE VISIT

STANDARD 17: NUMBERS OF CHILDREN ENROLLED

	REQUIREMENT/STANDARD	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
17.1	*The total number of students enrolled in a CARE school does not exceed the number whose needs and safety can be effectively cared for and protected within the financial and other resources of the school.*	•	•	•
CAPACITY TO MANAGE RISKS				

LINES OF ENQUIRY	EVIDENCE (documentation – collected – site visit)	SITE VISIT
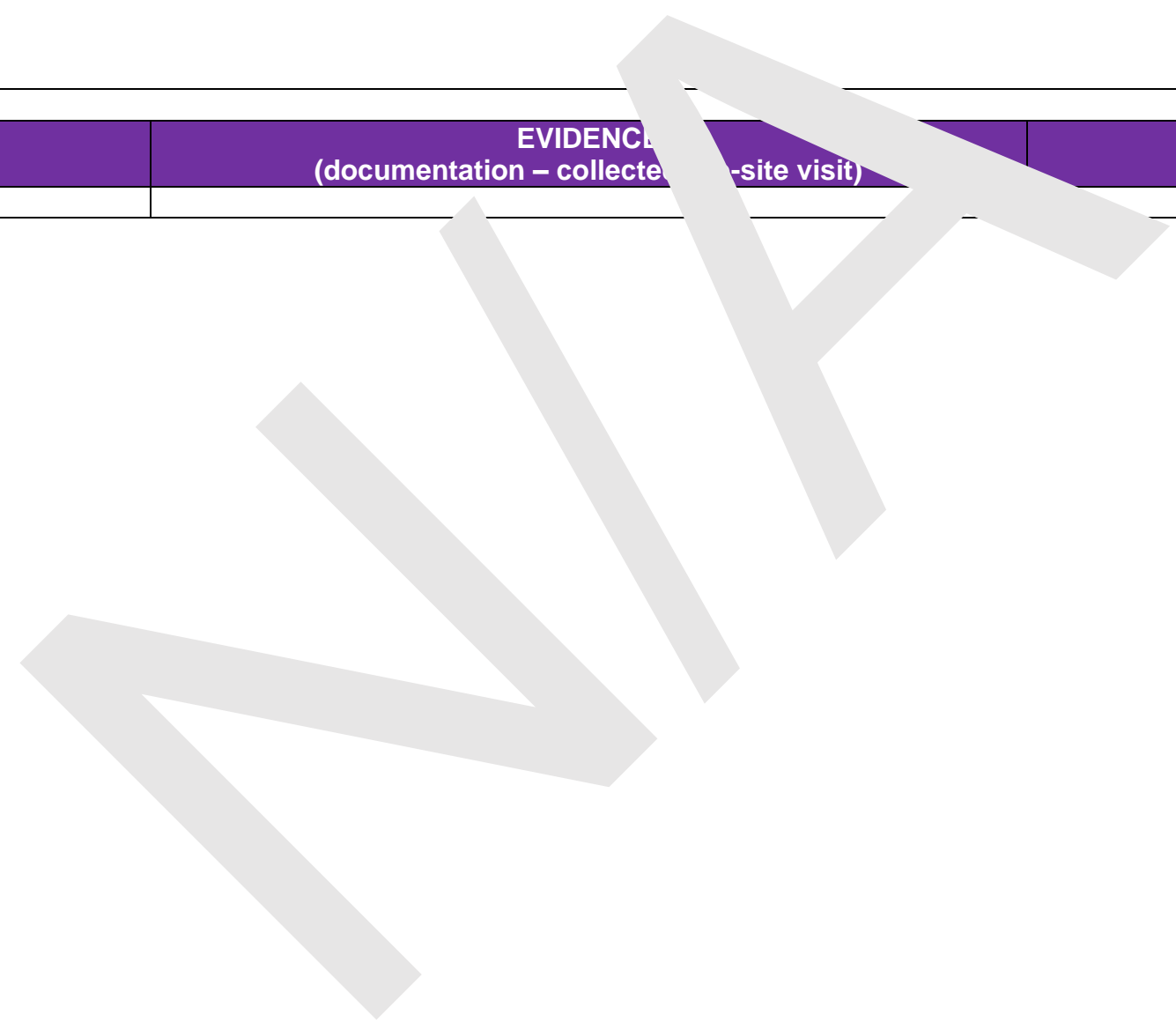
CHAPTER 7: STANDARD OF EDUCATION

REQUIREMENT	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
Section 160(1)(g) of the School Education Act requires you to consider whether the school will provide a satisfactory standard of education of the kind for which registration is sought or has been granted.*	• Interviews • Class visits	• Overall the standard of education is satisfactory with the current leadership team endeavouring to introduce current 'best practice' strategies to the school • There is also an excellent coaching support service provided for classroom teachers • A concern is, however, that not all staff have been willing to engage with this positive move to a whole school approach focusing on 'best practice' • Differentiation in classrooms also requires monitoring • The interim feedback recommended that the Principal update the school Curriculum Plan in accordance with recommendations by your School Support Consultant. • This was confirmed to have been actioned as at 27 September.	**Meets the standard**

CAPACITY TO MANAGE RISKS
• The Principal has access to a School Support Consultant and Regional Officer that can assist with managing this.

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT
• Does the school's Curriculum Plan evidence and articulate the school's context? • Is there evidence of the Catholic context of the school and the role it plays within the school community? • Does the Curriculum Plan include a statement about the school, its beliefs and values (curriculum-focused)? • Does the Curriculum Plan provide an overview of the student population – SWD, ATSI, LBOTE, CAPs and IEPs? • Does the school use the SCSA Western Australian Curriculum? • Does the school adopt the PP-Year 10 teaching, assessing and reporting policy as outlined by SCSA? • Does the school teach a developmentally appropriate protective behaviours curriculum? • Does the school's Curriculum Plan link to their School Improvement and Strategic Plans?	St Bernard's School, KOJONUP – 2019 Curriculum Plan St Bernard's School, KOJONUP – Compliance Certificate (February 2019 COSI) St Bernard's School, KOJONUP – Curriculum Plan Assessment St Bernard's School, KOJONUP – 2019 School Improvement Plan St Bernard's Strategic Plan 2015-2018 Standard 1 – Records of Assessment of student needs and adjustments	• See comments provided in the 'Analysis' section

* While the registration standards impose a number of requirements which will contribute to the standard of education, this provision is wider. It could enable you to conclude that, even if all of the relevant registration standards are observed, a school nevertheless does not provide a satisfactory standard of education for its students.

CHAPTER 8: LEVELS OF CARE

REQUIREMENT	SOURCES OF EVIDENCE	ANALYSIS	CONCLUSIONS
Section 160(1)(h) of the School Education Act requires you to consider whether the school will provide satisfactory levels of care for the children concerned.	• Child-safe environment policies and procedures and evidence of implementation • Student welfare policies and procedures and evidence of implementation (e.g. privacy, technology usage, parent/guardian access arrangements, staff and student codes of conduct) • Student safety policies and procedures and evidence of implementation (e.g. critical and emergency incidents, evacuation and lockdown, excursions, water safety, out of school learning) • Bullying and harassment policies and procedures and evidence of implementation (e.g. behaviour management) • Catastrophic weather events procedures and evidence of implementation (if applicable) • Student health policies and procedures and evidence of implementation (arrangements for ill students, administration of medication, anaphylaxis and asthma management, communicable and infectious diseases, food and nutrition, sun protection, smoking, substance abuse, first aid) • Evidence of compliance with the *Disability Standards for Education 2005* for students with disabilities • Evidence of risk management relating to provision of satisfactory levels of care • The school's student recruitment policy and procedures	• The students feel safe and enjoy their school environment • However, the school's inconsistent approach to the protective behaviours curriculum requires attention • The school has a number of policies and procedures in place that support a positive environment, and ensure the welfare, safety and health of all students • The Staff Handbook contains information where all staff can access the school's policies and procedures • The Principal received actions in their interim feedback that required them to address the recommendations made under: *Standard 4: Staff, Standard 5: Premises, Standard 12: Child abuse prevention* and Standard *14: Management of student behaviour* • This was confirmed to have been actioned as at 27 September.	**Meets the standard**

CAPACITY TO MANAGE RISKS
•

LINES OF ENQUIRY	EVIDENCE (documentation – collected pre-site visit)	SITE VISIT

• Review the school's policies and procedures prior to attending the school visit to ensure they provide satisfactory levels of care for all students
• Are all members of the school community aware of the policies and procedures relating to the safety and wellbeing of all students?
• Do all members of the school community know how and where to access these policies and procedures?
• What are students' and parents/guardians' perceptions toward the levels of care provided by the school? Do they feel they are adequate?
	• All policies and procedures that cover the following areas:
	  o **Positive Environment:** positive school culture; pastoral care; classroom environment; behaviour management and discipline; anti-discrimination; bullying and harassment management; celebrating diversity
	  o **Student Welfare:** child protection (including mandatory reporting and child protection); privacy; technology use (including social media, mobile phones, cyber safety); parent/guardian access; student/staff relationships; duty of care; playground supervision
	  o **Student Safety:** emergency management (critical and emergency incidents); lockdown and evacuation procedures; evacuation records; catastrophic weather/bushfire (if applicable); playground safety; supervision of off-site camps, excursions and water-based activities; supervision of off-site workplace learning, VET and community service
	  o **Student Health:** health management (includes anaphylaxis and asthma); sun protection; medical records management; communicable and infectious disease management; substance abuse; management of medical conditions (including storage
		• See comments under the 'Analysis' section

	and administration of drugs); food and nutrition; students with a disability requiring a medical plan	

* While the registration standards require a number of policies and other protections for students' health, safety and wellbeing, this provision is wider. It could enable you to conclude that even if all of the relevant registration standards are observed a school nevertheless does not provide satisfactory levels of care for its students.