

**SAVE OUR SCHOOLS**

# **Submission to the Review of the Registration Process for ACT Private Schools**

**July 2013**

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Save Our Schools submits that there are five major problems with the in-principal approval and registration process for ACT private schools which should be addressed by the current review:

- Inadequate formal guidelines for the Minister for Education to assess applications for in-principle approval and registration against the criteria set out in the Education Act;
- The lack of an appeal process for interested parties other than the applicant;
- There are several inadequacies in the process for the public notification and inspection of applications for new schools and the publication of in-principle approval decisions and assessment panel reports on registration applications;
- Inadequate policies and standards to meet the registration criteria set out in the Education Act;
- The appointment and composition of the registration assessment panels.

This submission makes several recommendations to the review to address these problems.

## **1. Public guidelines for assessing impact and demand**

The Education Act requires that in deciding whether to give in-principle approval for the provisional registration of a private school, registration at an additional level and registration of a new campus, the Minister must have regard to:

- a) Whether the proposed school, additional level or additional campus would undermine the viability of existing schools, and
- b) Whether there is, or likely to be, demand in the community for the proposed school, additional level or additional campus.

However, there are no provisions in the Education Act to guide the Minister as to what factors should be considered in deciding whether to give in-principle approval. There are guidelines in the Directorate of Education Manual for Compliance and Registration of Non-government Schools but they have proved to be inadequate.

We submit that the Education Act should be amended to include specific guidelines for the assessment of the impact of new private schools on existing schools and the demand for new schools. Such guidelines are needed to ensure that all children from whatever background and location continue to have ready access to a government school. They are also needed to ensure orderly planning for the provision of schooling in the ACT and avoid unnecessary duplication and under-utilisation of existing schools. Guidelines are also needed to ensure consistency in assessing the impact of different proposals and in decisions on in-principle approval and registration.

### **1.1 Assuring access to a government school for all children**

First, in deciding on applications for in-principle approval, the Minister should have regard to the special role of the government school system in providing access to schooling for all children irrespective of their background. It is common nowadays for many in the community and government to see government and private schools as having the same role. This view ignores the unique role and obligation of the government school system to provide free access to a broad secular education for all children in each geographic region. Not everyone is able or willing to pay for a private education or is able to transport their

children over long distances to school. As recognised by the principles relating to government schools set out in the ACT Education Act (clause 18) it is the government's role to ensure that all children whatever their background and means have reasonable geographic access to the provision of a high quality secular education. The Act states that the government school system is committed to providing reasonable access to public education for all students in the ACT. Only the government school system performs this role. Private schools do not perform this role.

Therefore, in deciding on applications for new private schools, the Minister should have regard to the potential impact on the continuing special role that the government schools system has to play in each region. Too often in the ACT and elsewhere we have seen the expansion of private schools to the detriment of the ability of low income and other disadvantaged families to retain easy and free access to a local school for their children. Governments have been unwilling to maintain small schools when higher income families have left to enrol their children in private schools or other high demand government schools. The resulting reduction in access to a local school for less well-off families should be seen for what it is – a failure of school planning. This is not to deny the right of choice for families, but this right of choice should not lead to a loss of choice for less well-off families.

We propose that the Education Act be amended to include a requirement that in deciding whether to give in-principle approval for an application for a new school the Minister should have regard to the special role of the government school system to provide free and reasonable access to a secular education in all regions of the ACT and ensure that this role is not impaired by the establishment of new private schools. New private schools should not threaten the continuation of reasonable local access to a government school for families. New private schools should not be opened in suburbs or regions where there is already substantial excess capacity in existing government schools.

## **1.2 The principle of orderly planning of schools**

The establishment of new government and private schools should have regard to the orderly planning of schools and the efficient utilisation of resources. The allocation of public funds to new private schools should be consistent with the continued provision of effective education to students attending existing government and private schools. Careful planning and management of resources is needed within and between school sectors to avoid diseconomies and disruption resulting from enrolment decline and shifts. The provision of significantly more places than those required for a given population in a region can have significant educational and financial implications. Similarly, major diseconomies can be incurred by establishing new facilities without adequate community demand.

The principle of orderly planning is implicit in the requirement of the Education Act for the Minister to have regard to the potential impact of new schools and the level of community demand for new schools in deciding on applications for in-principle approval for new schools. We propose that this principle be made explicit by its inclusion in the Education Act. We recommend that the Act should state that approval of new private schools should be determined primarily with regard to whether applications are consistent with the overall planned provision of schools in the ACT.

### **1.3 Assessing impact and community demand**

We also propose that the Education Act be amended to require the Minister to have regard to a range of factors in assessing the impact of a proposed new school on existing schools.

The Directorate of Education and Training Manual for the Compliance and Registration of Non-government Schools sets out several criteria for assessing the impact of a proposed school on the viability of existing schools. These include impact on financial viability, educational programs, enrolments and strategic developments in existing schools. The Manual also sets out information to be collected in assessing community demand.

However, Ministerial and Directorate documents obtained through Freedom of Information reveal that these criteria and information requirements were not fully or consistently addressed in the recent round of in-principle approvals for three new private schools in Canberra, and especially in regard to the applications of Brindabella Christian College and Canberra Christian College.

In view of this failure to comply with the guidelines contained in the Manual for Compliance and Registration of Non-government Schools, we submit that factors, criteria and information that the Minister should have regard to in assessing in-principle approval applications should be specified in the Education Act. This would better ensure that relevant factors are taken into account and provide the opportunity for legal redress in the event of the Minister not complying.

To this end we propose that the Act be amended to include the following factors to assess impact on existing schools, government and private:

- Whether total enrolments in existing schools will be significantly reduced and unused capacity increased;
- Whether the extent and nature of educational programs and services for students in existing schools will be significantly restricted;
- Whether the social composition of enrolments in existing schools will be significantly narrowed;
- Whether the cost per student of operating an existing school will be significantly increased by reduced enrolments; and
- Whether reduced enrolments will significantly reduce the income and financial support available to an existing school.

We consider that all these criteria are relevant to ensuring the orderly planning of schools and ensuring continued reasonable local access to a government school. Proposals for new private schools should only be approved if the impact on all the above criteria is not significant. If any proposal is found to have a significant effect on any one of these factors it should be assessed as not being consistent with planned educational provision. The Education Act should be amended to give effect to this requirement.

To support implementation of these criteria, the Directorate of Education Manual for Compliance and Registration of Non-government Schools should specify the data to be collected to assess impact. This data should include, but not be restricted to the following:

- Projected enrolments for each school in the region of the proposed school over the next decade and compared with recent trends;
- Excess capacity in existing schools;
- The range of programs and services operating in existing schools and threshold enrolment numbers needed to sustain them;
- The social composition of existing schools and the likely social composition of the new school;
- Average cost per student in existing schools.

We also consider that there is a strong case to specify the information to be required and taken into account in order for the Minister to assess the level of demand in the community. The Education Act is quite explicit that in assessing likely community demand the Minister should have regard to likely increases in the school-age population in the region **and** the level of community interest in the proposed school.

The Directorate of Education Manual on the registration of private schools should specify the data to be collected to assess community demand. This information should include:

- Population trends in the ACT and the region in which the proposed school is to be located;
- Enrolment projections over the next decade for the proposed school;
- The number of the prospective enrolments by district and percentage of each district's enrolments;
- Details of the level of community interest for the proposed school and the method used to obtain this evidence;
- Signed forms by parents indicating intention to enrol students.

We also recommend that the Education Act should be amended to include minimum enrolment requirements for private schools as in several other states. Parents ought to have a reasonable expectation when they enrol their child in a school that it will be able to provide adequate educational opportunities through their primary and/or secondary education. The taxpayer is also entitled to be assured that the funds will be used efficiently. Minimum enrolment guidelines are needed to provide reasonable assurance that these expectations can be met.

Several state governments, including Victoria, Queensland, South Australia and Western Australia use minimum enrolment benchmarks in assessing applications for new private schools. The actual numbers vary from state to state and take account of the problems associated with isolated rural areas and special school settings.

The adoption of specific minimum enrolment levels in the ACT should be guided by research on school size. In broad terms, this suggests a minimum of 40 students for primary schools and a minimum of 20 students per secondary school year level. It should be expected that these levels should be achieved within three or four years of a school being registered. A school that cannot show that it will achieve these levels within the time frame should not be approved.

It is necessary that the proposed location of a school should be specified in the application. Without this it is not possible to assess impact on existing schools in the area. For example, a recent application gave the 'Belconnen area or Gungahlin area' as the likely location of the school. Another application stated that the school would be in Molonglo, even though planning for this region is still incomplete. The lack of certainty about the site of a proposed school makes it difficult for communities to comment on the potential impact of any new school or expansion of a school. Moreover, it makes it very difficult for the Minister to assess the effect on existing schools, the level of demand in the area or the level of interest shown by the proposed school community.

The Education Act should also be amended to require that a report on the assessment of impact of proposed new schools on existing schools and likely community demand for new schools should be prepared and published on the Directorate website. Current practice is that the assessment of impact and community demand by the Directorate is not published and it is therefore no public scrutiny of the assessment. A public report on the assessment would add significantly to the transparency of the process of deciding in-principle approval and registration of proposed schools.

## **2. Appeal rights against Ministerial decisions**

We consider that there are serious deficiencies in the review of decisions sections of the Education Act. There are appeal rights for all three registration decisions (in-principle, provisional and final registration) of the Minister, but appeals can only be made by the applying body if the Minister refuses an application. No appeal is possible against a decision to grant an application, even if the decision is prima facie seriously in error. Appeal by other than the applying body should also be possible.

We propose that the Act be amended to provide the opportunity for other interested parties, such as schools or organisations affected by an in-principle or registration approval, to appeal approval of an application. Other stakeholders should have the same appeal rights as those whose applications are rejected.

## **3. Public notification of matters relating to applications and decisions**

There are several inadequacies in the existing provisions for public notification of matters relating to applications for new private schools (including new stand alone schools, new campuses of existing schools, or extensions of existing schools to additional levels of education). We consider that these inadequacies have limited the opportunities for public comment and led to a lack of transparency about assessment and reporting on applications.

Under the Education Act, the Directorate must seek community comment on applications for in-principle approval by a notice in the Canberra Times. This may restrict the opportunity for comment if interested parties fail to read the notice or become aware of it. Even peak organisations have missed the notices at times, but it is especially difficult for individuals and local organisations to become aware of applications that may affect them (for example, a local school or P&C association). Recently, the Directorate has revised its practice to inform stakeholders of applications and the period for comment. This change is welcomed and we consider that requirements to this effect should be included in the Manual for the registration of private schools.

A copy of applications for in-principle approval must be made available “for inspection” at an office of the Education Directorate. However, recent practice by the Directorate have made it difficult for members of the public to record or copy information from these applications in order to make submissions on them. The term “for inspection” has been interpreted narrowly to mean that the Directorate does not assist in making photocopies or electronic copies available and those wishing to inspect applications have been required to physically attend the Directorate office and take notes if they want to record information to assist their comment on the application. This practice has also changed recently to provide easier access. We propose that the new arrangement be included in the Manual for the registration of private schools.

Under the Education Act, the Minister must inform the applicant of the decision in writing and state reasons for giving or refusing approval for an application. The Directorate must make the Minister’s statement available for public inspection. However, there is no requirement to inform the public or even those who made submissions regarding the application. Recent practice has been not to advise the public nor inform those who made submissions, so that they have been unaware of the Minister’s decision. We propose that the Education Act be amended to require that the Minister’s decision be posted on the Directorate website. We also propose that the Manual for the registration of private schools should include a provision that those who made comment on an application should be formally advised of the Minister’s decisions.

Another issue concerns the reports to the Minister by panels assessing applications for the registration of new private schools according to the registration criteria set out in the Education Act. Panels have to prepare a report advising the Minister on the satisfaction or otherwise of various criteria such as the curriculum, nature and content of the education to be offered, safety and welfare of students, and financial viability. These reports must be available for inspection at an office of the Education Directorate and a copy must be provided to interested persons at a reasonable cost. However, there is no requirement for the Directorate to inform the public or interested parties of the report. This obviously limits the opportunity of public scrutiny of decisions by the Minister. We propose that the Education Act should be amended to provide that panel reports on registration be published on the Directorate website.

#### **4. Inadequate policies and standards to comply with registration criteria**

The Education Act includes several criteria to be met for the registration of private schools. These cover governance, curriculum, student safety and welfare, qualifications of teaching staff, monitoring of education outcomes and financial viability.

The Directorate of Education and Training Manual for the Compliance and Registration of Non-government Schools sets out a range of guidelines relating to policies and standards required to meet these criteria. We submit that the guidelines rely too heavily on processes and information to be provided rather than compliance with minimum standards. We also submit that the guidelines provide a much lighter regulatory framework for private schools than applies to government schools. We further submit that the policies and standards in the guidelines are inadequate and should be specified in more detail, especially with regard to student safety and welfare.

#### **4.1 Lack of specified standards for the registration of new private schools**

We consider that the Directorate's Manual on the registration of private schools fails to specify adequate standards for compliance and guidelines on some registration criteria. It tends to rely on ensuring that private schools have policies and documents for inspection by registration panels rather than setting standards for compliance. As such, it focuses on processes and information to be provided rather than setting out minimum conditions or standards for in-principle approval and the registration criteria. This general deficiency is very much in evidence in relation to student safety and welfare, but it is also apparent in other areas.

The failure to provide conditions or standards to be met in key areas also creates the potential for different registration panels to use different standards in making their assessments. The absence of standards for the assessment of proposals puts the onus on panels to establish their own explicit standards or, more likely, to adopt implicit standards. Both can result in inconsistency in approach between panels while the use of implicit standards can lead to a lack of public transparency in the registration process.

We propose that the review of the registration process should develop more explicit standards and guidelines to be used in the assessment of the registration criteria. We also recommend that a more detailed list of specific policies required as evidence of compliance to the registration criteria. Specific proposals are outlined below.

#### **4.2 Lighter regulation of private schools than government schools**

The Directorate's Manual provides for a much lighter regulatory framework for private schools than for government schools. Government schools are required to meet a range of policies and standards that are not specified for private schools. For example, government schools have to comply with many detailed policies on student safety and welfare that are not specified in the manual for private schools. These include policies on excursions, outdoor adventure activities, playground supervision, illness, infectious diseases, accidents, critical incidence planning, administering medication, HIV/AIDS mandatory procedures, racism, sexual harassment, sun protection and many others. Many of these policies include standards and procedures for implementation. None of these policy requirements are specified in the Manual.

Government schools are also required to comply with many other policies and guidelines that are not required of private schools by the Directorate's manual. These include policies on behaviour management, care and use of animals, equal opportunity employment, gifted and talented students, and school canteens.

There is little reason why similar requirements should not be made for private schools, particularly in relation to student welfare and safety. A large proportion of private schools in the ACT have around 70 per cent of their total income provided by the taxpayer. They should be required to have similar policies and meet similar standards as government schools.



### **4.3 Minimum governance requirements**

There is a significant gap in the minimum governance requirements in the Directorate's Manual. It fails to require that private schools are governed and staffed by people of good character who do not pose a physical, psychological or sexual threat to children. Private schools should be required to meet the same stringent standards of behaviour that are expected in the governance of government schools.

We recommend that the Manual should require that members of the government body of private schools should be fit and proper persons to manage a school and any related facilities such as boarding facilities. The members of governing bodies should have demonstrated good character and repute as appropriate to the management of an institution educating children. They should have documented police clearance to confirm that they have no conviction that would render them unfit for involvement in the governance of a school or related facility.

Proprietors and principals who have operated or managed a school for which registration has been cancelled anywhere in Australia should be disqualified from involvement in the operation or management of a private school in the ACT for a period of at least five years from the date of cancellation. Proprietors and principals should be required to certify at the time of applying for registration that they have not been involved in the operation of a deregistered school.

### **4.4 School organisation and policies**

The Directorate Manual fails to provide for some basic school organisation matters. For example, there is no requirement on the minimum number of days per year or hours per week that a school will be open to students. This seems to be a basic requirement to ensure that the curriculum can be delivered to students. There are also no standards specified for student/teacher ratios or class sizes. The policy for government schools is that there should be an average class size of 21 students across primary and high schools and 19 students in colleges.

We recommend that the Manual should include standards to deliver the curriculum offered by a private school. These should include a minimum number of days per year the school is open to students, a minimum number of hours per week and per day and maximum class sizes for primary schools, high schools and colleges.

The Manual provides a broad list of school policies to be presented as part of the registration assessment process. However, it fails to provide a detailed checklist of specific policies that should be in place – only broad categories of policies are itemised. This contrasts markedly with the list of detailed policies applying to government schools. We recommend that the Manual should include a list of specific policies that private schools should have in place in order to be registered.

There is a major gap in the Manual relating to student safety and welfare. The registration criteria of the Education Act include appropriate policies for the safety and welfare of students, yet no such policies are specified in the Manual. The Manual includes only a requirement that a school have student welfare policies, programs and support structures

(p. 85). In contrast, all other registration criteria are specifically addressed by some guidelines and evidence requirements.

We submit that applicants for registration should be required to supply evidence that they have specific policies and programs in place that provide for student safety and welfare in all its aspects, just as government schools have to. The Manual should include a list of specific policies and programs to ensure that the registration criterion is effectively met. These should cover matters such as student welfare and support, behaviour management and discipline, bullying and harassment, racism, drug and alcohol use, accidents, excursions, outdoor adventure activities, playground supervision and a range of health related matters.

Schools should also be required to have programs in place to meet the personal and social needs of students. They should be required to demonstrate how pastoral care, including counselling, is to be organised and the qualifications of personnel to be responsible for them.

## **5. Assuring the independence of registration panels**

We submit that guidelines for registration assessment panels should be revised to assure the independence of the panels. The existing guidelines are not adequately specified and allow potential bias and conflicts of interest in the composition of panels. Indeed, they have permitted the appointment recently of a biased panel with a majority of representatives of private schools.

The Directorate's Manual distinguishes between panels appointed for the registration of Catholic schools and other private schools. A memorandum of agreement between the Directorate of Education and Training and the Catholic Education Office devolves the administration of the renewal of registration of Catholic systemic schools to panels appointed by the Catholic Education Office. The administration of panels for the registration of all new schools and for the renewal of registration of all schools apart from Catholic systemic schools are undertaken by the Non-Government School Section of the Directorate.

The Manual does not distinguish between panels set up to administer the renewal of registration of Catholic systemic schools and those to administer registration of new systemic Catholic schools, additional campuses and extensions to additional levels. Our understanding is that this does not accurately reflect the memorandum of agreement which relates solely to renewal of registration and not to other registration processes. We recommend that the Manual be revised to make this distinction and require that the Non-Government School Section of the Directorate manage the administration of panels for the registration of new Catholic schools, additional campuses and extensions to additional levels.

The Manual states that an independent panel comprised of members with a range of competencies that enable the panel to meet the legislative requirements will be drawn from suitably qualified staff from the following groups:

- The Catholic Education Office
- The Association of Independent Schools of the ACT
- ACT Department of Education and Training

- Tertiary Institutions (ie: universities for teacher training)
- Community member or business representative with relevant expertise (optional)

This membership does not guarantee an independent panel. Panels could be biased by the appointment of a majority of members from the private school sector. This is the case with the recent appointment of the panel to assess the renewal of registration of Brindabella Christian College at Lyneham and the registration of its proposed new campus in Charnwood. A panel of 10 was appointed by the Minister and a majority are private school representatives. The panel is comprised of the chair who is the principal of Belconnen HS, two private school principals, four private school teachers, two Directorate officers and one Board of Senior School Studies officer. Other registration panels in the last few years have also had a majority of members from the private school sector.

We consider that provision should be made to ensure the independence of registration panels. ACT private schools are extensively funded by taxpayer and the taxpayer should be assured that the process of registration of private schools is done by an independent panel and not be turned into a self-regulatory process by recipients of taxpayer funding.

We recommend that the Education Act be amended to provide that registration panels appointed by the Minister are comprised of a majority of members from outside the private school sector. We further recommend that the procedures should be tightened to specify that no more than one member of each panel can be an employee or parent in the school sector from which the application is received. No member should be appointed to the panel if they have an interest in the school being reviewed for registration.

We further submit that the Memorandum of Understanding between the Education and Training Directorate and the Catholic Education Office (CEO) on the re-registration of Catholic systemic schools should be revised to ensure the independence of the panels. At present, the only requirement is that a majority of members should be from outside the Catholic school sector. This leaves it open for the appointment of biased panels comprised of a majority of members from private schools. We recommend that these panels be comprised of a majority of members who have no association with the private school sector in any capacity.

## **6. Recommendations**

We propose several recommendations for amendments to the Education Act and to the Directorate's Manual for the Compliance and Registration of Non-Government Schools.

### **6.1 Amendments to the Education Act**

1. In considering applications for in-principle approval of new private schools, additional year levels and additional campuses, the Minister should have regard to the objective of orderly planning of schools to support efficient utilisation of school facilities.
2. In considering applications for in-principle approval the Minister should have regard to sustaining the special role of the government school system to provide free and reasonable access to a secular education in all regions of the ACT.

3. In assessing the impact of applications for in-principle approval the Minister should have regard to the following factors:
  - Whether total enrolments in existing schools will be significantly reduced and unused capacity increased;
  - Whether the extent and nature of educational programs and services for students in existing schools will be significantly restricted because of a decline in enrolments;
  - Whether the social composition of enrolments in existing schools will be significantly narrowed;
  - Whether the cost of operating an existing school will be significantly increased by reduced enrolments; and
  - Whether reduced enrolments will significantly reduce the income and financial support available to an existing school.
4. If any application for in-principle approval is found to have a significant effect on any one of these factors it should be assessed as not being consistent with planned educational provision.
5. Applications for in-principle approval should be required to meet minimum enrolment requirements.
6. A report on the assessment of impact of proposed new schools on existing schools and likely community demand for new schools should be prepared and published on the Directorate website.
7. Other interested parties to applications for in-principle approval, such as schools or organisations affected by an in-principle or registration approval, should have a right of appeal against approval of an application.
8. The Minister's decision on an in-principle approval application should be posted on the Directorate website.
9. Panel reports on the registration of schools (including for additional years of school and additional campuses) be published on the Directorate website.
10. Registration panels appointed by the Minister should have a majority of members from outside the private school sector. No more than one member of each panel can be an employee or parent in the school sector from which the application is received. No member should be appointed to the panel if they have an interest in the school being reviewed for registration.

### **6.1 Amendments to the Manual for Compliance and Registration of Non-government schools**

1. The Manual should specify the data to be collected to assess impact and include but not be restricted to the following:
  - Projected enrolments for each school in the region of the proposed school over the next decade and compared with recent trends;
  - Excess capacity in existing schools;

- The range of programs and services operating in existing schools and threshold enrolment numbers needed to sustain them;
  - The social composition of existing schools and the likely social composition of the new school;
  - Cost per student in existing schools.
2. The Manual should specify the data to be collected to assess community demand including the following:
    - Population trends in the ACT and the region in which the proposed school is to be located;
    - Enrolment projections over the next decade for the proposed school;
    - The number of the prospective enrolments by district and percentage of each district's enrolments;
    - Details of the level of community interest for the proposed school and the method used to obtain this evidence;
    - Signed forms by parents indicating intention to enrol students.
  3. The proposed location of a school should be specified in the application.
  4. The Manual should include the recently revised practices by the Directorate to inform stakeholders of in-principle approval and registration applications and the period for comment.
  5. The Manual should include the recently revised practices by the Directorate to provide easier access to applications for in-principle approval and registration by interested parties.
  6. The Manual should include a provision that those who made comment on an application for in-principle approval or registration should be formally advised of the Minister's decision.
  7. The Manual should include more explicit standards and guidelines to be used in the assessment of the registration criteria.
  8. Proprietors and principals who have operated or managed a school for which registration has been cancelled anywhere in Australia should be disqualified from involvement in the operation or management of a private school in the ACT for a period of at least five years from the date of cancellation. Proprietors and principals should be required to certify at the time of applying for registration that they have not been involved in the operation of a deregistered school.
  9. The Manual should include standards to deliver the curriculum offered by a private school. These should include a minimum number of years the school is open to students, a minimum number of hours per week and per day and maximum class sizes for primary schools, high schools and colleges.

10. The Manual should include a list of specific policies and programs applicants should provide to meet the registration criterion relating to student welfare and safety. These should cover matters such as student welfare and support, behaviour management and discipline, bullying and harassment, racism, drug and alcohol use, accidents, excursions, outdoor adventure activities, playground supervision and a range of health related matters.
11. The Manual should require schools to have programs to meet the personal and social needs of students. They should be required to demonstrate how pastoral care, including counselling, is to be organised and the qualifications of personnel to be responsible for them.
12. The Manual should be revised to does not distinguish between panels set up to administer the renewal of registration of Catholic systemic schools and those to administer registration of new systemic Catholic schools, additional campuses and extensions to additional levels and require that the Non-Government School Section of the Directorate manage the administration of panels for the registration of new Catholic schools, additional campuses and extensions to additional levels.
13. The Manual should be require that panels for the renewal of registration of Catholic schools be comprised of a majority of members who have no association with the private school sector in any capacity.