

ISQ Submission to NSSAFRI Taskforce

Feedback on the Prototype Wording of the Queensland Boarding Schools Standard and Criterion



20 January 2026

About Queensland Independent Schools

Community confidence in the independent schooling sector remains strong with more than 158,000 students enrolled in 249 independent schools across Queensland. These schools educate approximately 17.8 percent of the state's total school-age population.

Independent schools are valued institutions and a pivotal part of Queensland's education system. They are valued schooling choices for families, hubs of human and community connection, places of intellectual, civic and social development, employers and employment generators, education innovators and change-makers.

Independent schools are as unique as the communities they serve and offer parents a choice in the education of their children. Common to all independent schools is their commitment to strong student outcomes, high standards of behaviour, and the welfare and wellbeing of students.

Many independent schools educate international students or specialise in the education of students with disability. There has also been strong growth in the number of Special Assistance Schools for students who have disengaged from mainstream schools, and trade training schools that combine senior year studies with practical vocational education and training. There are 32 ISQ member schools with boarding facilities with 3,831 enrolled boarders.

Over the past five years, enrolments at Queensland independent schools have increased by more than 11 percent. This growth is a clear indication that parents value an independent education and are prepared to invest their after-tax incomes in their child's schooling.

Independent Schools Queensland (ISQ) is the peak body representing Queensland's independent schooling sector. Independent Schools Queensland represents the interests of its member schools, fosters choice in education and protects the autonomy of independent schools. ISQ is a not-for-profit organisation and membership to ISQ is voluntary.

Background Information

Establishment of the NSSAFRI Taskforce

In 2023, the Queensland Government commenced a review of the Queensland Non-State Schools Accreditation Framework (the Review). The purpose was to ensure the Non-State Schools Accreditation Framework (the Accreditation Framework) was fit for purpose, supported the provision of quality education, and maintained public confidence in Queensland's non-state schools. Ms Cheryl Vardon AO was appointed to lead the Review.

The [Final Report](#) was published in August 2023. In the early part of 2024, the Queensland Government [response](#) accepted in-principle 21 recommendations for implementation, and a further three, relating to the establishment of a new governance structure, to be considered further. This was followed by the establishment of a dedicated Non-State Schools Accreditation Framework Review Implementation (NSSAFRI) Taskforce in the Department of Education to progress this work.

Recommendation 1.3 (R.1.3) proposed that an additional Standard for boarding schools be created in Queensland, which adequately reflects the higher risk and vulnerability of students being educated while living away from their families. The recommendation also proposed that associated guidelines be developed to assist schools to achieve and maintain compliance with the new standard. In May 2024, a Stakeholder Reference Group (SRG) was appointed to provide input and feedback to help co-create key approaches, while technical experts joined the Working Group (WG) to provide specific technical knowledge and advice in the development of a Queensland Boarding Schools Standard (QBSS). ISQ had representatives in both groups alongside other non-state school sector representatives from Queensland Independent Schools Parent Network (QISPN), Isolated Children's Parent Network Queensland (ICPA Qld) and Catholic Education Queensland Limited (CEQL).

Co-Design of a Boarding Schools Standard (R.1.3)

There are 32 ISQ member schools with boarding facilities, 15 Catholic boarding schools and 3 boarding facilities managed by the state school sector.

The intention of the co-design work was to ensure all Queensland non-state schools meet minimum common standards, and that all students have access to the same basic education and safe learning environment, regardless of the school they attend in Queensland. The NSSAFRI Taskforce noted at the time that a national boarding standard (Australian Boarding Standards - AS 5725:2015) already existed and that while it provided the initial conceptual scaffolding in the co-design work; it was 10 years old and required updating. Revision of the Australian Boarding Standards will commence in 2026 and is anticipated to take up to 3 years to complete.

Changes in departmental priorities and organisational structure impacted the work undertaken by the NSSAFRI Taskforce which led to several 3-month extensions to the project timeline, with the last extension being 31 December 2025. The first full draft wording of the QBSS and Criteria (Criterion 1-5), was completed through the co-design process and submitted to the Interim Taskforce Director on 22 October 2025.

Subsequently, on 28 October 2025 members of the WG (Department representative, Interim Director of the Taskforce, ISQ, QISPN, CEQL and ICPA Qld) visited Dalby State High School – Bunya campus (State), Downlands College (Catholic) and Fairholme College (Independent). The CEO of ISQ and the Deputy Director General made a further visit to St Margaret’s Anglican Girls School. These boarding school visits provided an opportunity for the Interim Taskforce Director and Deputy Director General to see first-hand our boarding facilities and engage directly with the boarding school principals and heads of boarding.

On 30 October 2025, the first prototype wording for the QBSS and the Criteria (Criterion 1-5), which was further refined by the Interim Taskforce Director was sent through to the WG members for consultation and feedback. The prototype documentation included examples of minimum demonstration requirements that were suggested by NSSAB and the Interim Taskforce Director which were to be included in the Guidance Material. It is important to note that despite strong and consistent advocacy from the non-state school WG members for the guidance material to be developed alongside the draft standard and criteria, the examples of minimum demonstration requirements were not part of the co-design process.

ISQ Advocacy

ISQ has consistently advocated throughout the co-design process that the Queensland Boarding Schools Standard (QBSS):

- must be kept at a high level and is not so prescriptive that it places disproportionate compliance burden on boarding schools;
- avoids duplication of requirements in the standard that are already covered elsewhere as part of the school’s accreditation obligations;
- ensures non-state boarding schools are not held to a higher standard than state-run boarding facilities; and
- respects parent choice, which means not having overly prescriptive quality standards that will eliminate some providers out of the market.

While non-state schools consistently strive to exceed minimum requirements, it is essential that any regulatory framework maintains consistency and fairness across the entire education sector. The QBSS should not, from a compliance standpoint, impose a higher regulatory burden on non-state schools than that applied to state boarding facilities. ISQ recommends that any new Boarding Schools Standard and associated criteria explicitly recognise existing legislative obligations to avoid unnecessary duplication or the imposition of additional regulatory burden, for example existing WHS and Child Safe Standards requirements. It is also important to note that CRICOS-registered schools operating boarding facilities are already subject to a rigorous quality assurance process under Standard 5 (Younger Overseas Students) of the National Code 2018, which comprehensively addresses student welfare and accommodation.

Throughout this process, ISQ has worked collaboratively with QISPN, CEQL and ICPA Qld and the Taskforce, to ensure a shared understanding of non-state boarding (noting our different sectors) and the importance of parent choice. At times, the delay in progressing this work has been challenging; however, ISQ is very appreciative of the Taskforce’s commitment to providing boarding school providers with appropriate consultation and the opportunity to inform this important work. We look

forward to improving the consultation process and opportunities for all stakeholders, e.g. parents, to be involved as this work progresses.

ISQ remains committed to working collaboratively to implement the Vardon recommendations in a way that "does not create additional regulatory burden for a sector that is already operating at capacity". In doing so, it is important that the scope and language of these requirements adequately reflect the diversity of the sector and the need to ensure that any changes do not disproportionately impact on smaller boarding schools.

General Feedback from the Independent School Sector

I. Avoid Duplication and Administrative Burden

- Many proposed boarding standard requirements duplicate existing accreditation and compliance requirements.
- Recommendation that boarding is not treated as a separate entity from the school and there is a need for better streamlining and alignment with current processes.

II. Clarity of Language and Scope

- There is a need for clearer language/terminology, especially around terms like “coordinated learning”, “boarding service”, and “governance structure,” to avoid misinterpretation and regulatory overreach.
- Recommendation that the QBSS standard explicitly recognises the integration of boarding within the whole school, not as a standalone service. The QBSS should not create a separate governance or compliance regime for boarding, rather ensure inclusion and alignment with existing school policies and structures.
- Concern that the current scope only refers to “accredited non-state school boarding services” which are already operating in a highly regulated environment. It is important that consideration be given to the increased regulation non-state school boarding facilities are subject to, compared to private accommodation providers that house many school students in remote and regional areas (e.g. AFL House, NRL Cowboy House, Blair House Student Hostel, Roma Rural Student Hostel, etc).

III. Equity and Fairness

- Given that the QBSS applies only to non-state schools and not to state boarding or other residential providers as mentioned earlier, this potentially creates an uneven playing field.
- There is strong support from the sector for a consistent standard applicable across all boarding providers, referencing the Royal Commission’s intent for all children.

IV. Impact on Small and Rural Schools

- There is a strong concern about the risk that increased regulatory requirements could force smaller or rural boarding schools to close, reducing educational choice for families.

V. Staff Qualifications and Practicality

- There is a need for realistic expectations regarding boarding staff qualifications, noting the difficulty of recruitment and the lack of specific boarding qualifications.
- Recommendation to avoid imposing minimum qualifications that are not feasible or necessary for all roles and recognition that recruitment decisions should be at the discretion of the school, taking into account the local context and community need.

VI. Consistency and Transparency in Regulation

- There is strong feedback from the sector about the importance of clear and consistent expectations of demonstrated compliance by NSSAB authorised persons, to prevent subjective or variable judgements when they conduct school reviews - “any future minimum

demonstration requirements should: be clear, tangible and easy to measure / monitor for compliance". Many schools have reported that during a review, there is an element of subjectivity as to whether a school has met a particular criterion. Given there are so many "Examples of Minimum Demonstration Requirements" suggested by NSSAB, schools are concerned that the subjective nature of determining compliance is likely to continue within the Boarding School Standards as well.

- Recommendation that as a minimum, NSSAB provides a boarding specific checklist for the authorised person to adhere to, rather than an interpretive list. Further clarity would be appreciated as there are concerns about a 'regulation creep' and there is a need to define the maximum, not just minimum, requirements.
- Additionally, boarding schools in the non-state sector are complex environments and quite unique in their offerings. NSSAB is encouraged to continue strengthening the capability of authorised persons through ongoing professional development and by fostering a thorough understanding of the diversity within the non-state boarding school sector.

VII. Consultation Process and Timeline

- Overall strong concerns about the seemingly rushed consultation timelines for thorough sector input.
- Recommendation that the Department consider the consultation process that allows for a more rigorous and timely sector consultation in the future.

VIII. Alignment with Existing Standards (e.g., CRICOS, Child Safe Standards, WHS)

- Concerns raised about how the new QBSS will align with (or duplicate) existing requirements, for example, for international students and other regulatory frameworks that schools must comply with.

Specific Feedback on the QBSS and Criteria Prototype Wording

Queensland Boarding Schools Standard Prototype Wording

Accredited non-state school boarding services ('Boarding Schools') support the continuation of a boarder's learning and provide safe living away from home accommodation within the unique context of each boarding school through:

- safe, secure and appropriate accommodation services aligned with the school community's philosophy;
- learning and engagement services that are inclusive of all boarders by demonstrating delivery of appropriate care, wellbeing and development opportunities;
- a strong parent, carer, kinship and community engagement approach providing cultural safety and tailored to the local context to support all boarders throughout their time living away from home; and
- ongoing functional, fit-for-purpose and safe boarding facilities.

ISQ acknowledges that the scope of the co-design work only extends to "accredited non-state school boarding services". Whereas other privately operated accommodation services that support schools in housing students in remote and regional areas, e.g. NRL Cowboy House, AFL House and other hostels, were not included. Schools impacted raised concerns that not having such providers in scope is problematic, as many report that this group of providers would benefit most from stronger support and compliance guidance. Additionally, state boarding facilities were not in scope for this co-design work.

Bullet Point 1 - Reference to a school community's philosophy is problematic as the school community itself is remarkably diverse and it would be difficult to define a unified school community's philosophy. Instead, it would be appropriate to refer to the school's official written statement of philosophy, vision, and aims.

Bullet Point 2 –

- a. The term "inclusive" is a broad and loosely defined term. Is the intent of this statement to confirm that by providing appropriate care, wellbeing and development opportunities, boarding schools are taken to be inclusive?
- b. It is not clear what is meant by the term "learning and engagement services". Some of the nomenclature might imply that boarding students are separate from the school in terms of the learning support they are provided. Additionally, there are many students who go home to their parents after school and where the parents do not provide tutoring and/or access to extra-curricular activities for their child. Whilst many boarding schools do provide these services, it is not clear why an obligation would be created that disproportionately burdens boarding schools and is not necessarily reflective of parent's choice and preference.

Direct feedback from Boarding School Providers

Please note that the responses below are taken directly from independent boarding school providers – hence the language and tense used.

Criterion 1 – Boarding Services Management

Management of safe, secure and appropriate boarding services which must demonstrate:

- 1.1 governing body, day school and boarding service alignment across strategic planning, policies and operations;
- 1.2 principal, school leadership and boarding staff engagement;
- 1.3 a clear, transparent and publicly visible boarding school governance structure;
- 1.4 secure and coordinated learning, health and accommodation service operations;
- 1.5 compliance with relevant (human resource) legislation including level of supervisory coverage and criminal history checks; and
- 1.6 operationally consistent and documented child safety, financial, facilities, risk and records management systems and processes.

Feedback on specific criterion clauses:

1.1 - What alignment means is very confusing. Is the intention to ensure that boarding services are included in the governing body's consideration of long-term planning and that boarding-specific policies exist? If that is the intent, the point should be more clearly redrafted.

1.2 – This is confusing. Is the intent for the principal and school leadership to be actively engaged with what's happening in the boarding service?

1.3 - What is a boarding school governance structure? Is this supposed to mean an organisational chart or structure, including those to whom the head of boarding reports? Consider using "organisational structure" instead of "governance structure" to better reflect existing accreditation requirements.

1.4 - Define "coordinated" operations. Is the intent that an appropriate number of policies and procedures exist that coordinate the boarding service's operations? Remove or clarify references to "coordinated learning" and "learning and engagement services" to avoid holding boarding students to a higher standard than day students.

1.5 - Why is HR legislation pointed out? The Fair Work Act says nothing about supervisory coverage. Blue Card compliance or separate criminal history checks? The latter would make no sense. All schools will also have to comply with the Child Safe Standards from January 2026.

1.6 - To be aligned with the rest of the accreditation framework, this should be drafted as: "to have and implement processes". Avoid duplicating requirements already covered by other regulatory areas, such as child safety, governance, and financial processes.

Feedback on the suggested minimum demonstration requirements examples:

- The proposed compliance expectations introduce significant administrative and financial burdens.
- Boarding staff are already managing complex pastoral, welfare, and operational responsibilities.
- Additional layers of documentation particularly duplicative policy registers, governance charters, and procedural alignment between day and boarding operations risk diverting time and focus away from the core purpose of residential care and wellbeing.

Criterion 2 – Boarders care, wellbeing and development

All members of the boarding school community are encouraged to be active participants in fostering positive, respectful relationships to create a school culture that values boarders' agency, safety, voice, wellbeing and diversity by:

- 2.1 supporting boarders' continued wellbeing and education journey while living away from home;
- 2.2 promoting positive boarder interactions and communications between and within the boarding facility, day school and with parents/carers;
- 2.3 supporting access to co-curricular and pastoral care programs; and
- 2.4 enabling preparation for life beyond school through self-agency and independence development opportunities.

Feedback on specific criterion clauses:

2.1 - The goal/intention here is fine; however, it is too vague. To create more clarity, the requirement might be having and implementing a statement of service, such as that existing in Distance Education and Special Assistance Schools, which covers the boarding service's approach to wellbeing and education support. Consider adopting a standard-of-service approach similar to distance education and SAS schools, allowing schools to document their own processes for well-being and care.

2.4 - Vague. Living in a boarding house is itself the greatest independence development opportunity for any young person.

Feedback on the suggested minimum demonstration requirements examples:

- The emphasis on student agency, diversity, and voice is supported in principle. However, the cumulative effect of additional procedural documentation as evidence of minimum demonstration, for e.g. attendance records to census day, extended complaints management protocols, and additional child protection reporting processes, will impose further administrative load without clear evidence of improved outcomes.
- Many boarding programs already operate under robust student welfare frameworks and now the implementation of the National Child Safe Standards, which provide sufficient guidance. The risk here is policy duplication with multiple overlapping of compliance instruments requiring constant review and record-keeping.

- A more balanced approach would recognise existing compliance obligations and allow schools to demonstrate equivalence, rather than require wholesale adoption of new, prescriptive formats.

Criterion 3 – Boarding school staff are qualified, trained and safe

Boarding school staff must be:

- 3.1 qualified relevant to their role and responsibility;
- 3.2 appropriately inducted and receive ongoing training to support the health, safety and wellbeing of boarders; and
- 3.3 afforded a safe working environment.

Feedback on specific criterion clauses:

3.1 – What would be the minimum qualification requirements for boarding staff? Are there any suggestions? Are schools now required to recruit only those staff with a formal qualification? Many boarding schools do not have staff with formal qualifications but are recruited on experiential learning and expertise. Clarify what is meant by "qualified" staff, avoiding the implication of mandatory boarding-specific qualifications, and focus on relevant training (e.g., first aid).

3.3 – This requirement is already covered in WHS legislation.

Feedback on the suggested minimum demonstration requirements examples:

- Schools already meet rigorous staffing and compliance requirements under existing state and commonwealth legislation. This proposed criteria, while well-intentioned, extend these obligations into new audit and recordkeeping domains, for e.g. expanded WHS documentation, psychosocial hazard tracking, and validation of training comprehension. Such expectations are resource intensive and costly, particularly for smaller boarding operations that do not have the scale to support dedicated compliance staff. The practical challenge lies not in the intent, but in the volume and granularity of evidence demanded to demonstrate compliance.
- A risk-based, proportionate approach is strongly recommended. One that recognises established systems already ensuring staff suitability, training, and safety.

Criterion 4 – Parent, caregiver, kinship and community engagement

Boarding schools are committed to parent, caregiver, kinship and community engagement by:

- 4.1 supporting parents and caregivers of boarders to actively engage in the learning and wellbeing journey of their children;
- 4.2 providing boarding school life involvement opportunities to parents and care givers, including in supporting school advisory mechanisms where appropriate; and
- 4.3 building and maintaining collaborative partnerships between the boarding school, boarders, parents, carers, kinship and community.

Feedback on specific criterion clauses:

- 4.1 – How feasible is this in remote and regional settings where students are in the care of the state?
- 4.2 - There are no mandates to provide "school advisory mechanisms" in the accreditation framework; therefore, boarding schools should not be required to have them, as this would extend obligations beyond current accreditation requirements. Involvement should be context-specific for each boarding school.
- 4.3 - How is this different to the points above? Suggest that the approach to engagement with parents is included in a statement of service.

Feedback on the suggested minimum demonstration requirements examples:

- Many of the suggested minimum demonstration requirement examples, for e.g. "evidence of social media presence" and "strategic engagement plans", do not necessarily equate to improved parent partnership or student outcomes. Schools should be encouraged to demonstrate engagement in ways that reflect local context and community character, not through mandated templates.
- Remove repetitive elements, such as supporting the education journey, from multiple criteria to streamline requirements.
- Community engagement is already a strength of most boarding programs. Formalising these relationships through policy documents, strategic plans, and evidence registers, however, adds compliance pressure without enhancing practice. Engagement is relational, not procedural, and should not be reduced to audit artefacts.

Criterion 5 – Fit-for-purpose boarding facilities

Boarding schools are to ensure facilities that are fit-for-purpose by:

- 5.1 meeting obligations to provide boarders and boarding staff with safe and secure boarding facilities;
- 5.2 complying with requirements of any Act or other law relating to land use, building and work health and safety to ensure the health, safety and welfare of students while boarding; and
- 5.3 responding to the local context, including where relevant the boarding school philosophy, religion, size, location and boarder cohort.

Feedback on specific criterion clauses:

5.1 - What does the term “obligations” refer to? If this is about WHS, that is already covered in the WHS Act and the Accreditation Regulation. While “safe” likely refers to WHS, does “secure” have a specific meaning? It would be important to clarify this further.

5.2 – The compliance requirements referenced here is again already covered in the Accreditation Regulation. Why is there a need to duplicate it in the boarding criteria?

5.3 - How does this point fit under facilities?

Feedback on the suggested minimum demonstration requirements examples:

- Including evidence of development approvals, maintenance registers, and certification records overlaps with existing legislative obligations under workplace health and safety, building compliance, and local council regulations. These requirements appear to duplicate existing regulatory regimes, adding administrative repetition rather than improving safety outcomes.
- For smaller or regional schools, the financial and administrative impact of new, parallel reporting systems could be substantial.
- A coordinated framework that references existing compliance evidence, rather than requiring separate boarding specific documentation, would reduce burden while maintaining accountability.

