

AUSTRALIAN COUNCIL OF JEWISH SCHOOLS



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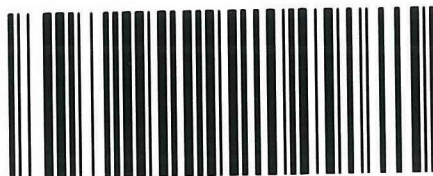
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29 March 2017



PCU070258

Director, Industry and Infrastructure Policy,
PO Box 39
Sydney NSW 2001.

By Email infrastructure.sepp@planning.nsw.gov.au



Dear sir/Madam

New Education and Child Care Policy

The Australian Council of Jewish Schools (ACJS) represents 5 NSW Independent schools which enrol 3,400 school age students and a further 510 students in child care early learning facilities attached to the schools.

The ACJS wishes to express its gratitude to the Department and to the Government for its foresight in addressing this issue and seeing it to this point as a priority measure. The ACJS also expresses its gratitude for including us in the consultation process and for the hearing we were afforded.

We, with our schools have reviewed the proposed arrangements and think in the main that they represent a situation that will ease much of the burden and uncertainty many of our schools faced. We will be able to work within the guidelines and am extremely grateful for these amendments.

There are however, two (2) matters that we seek to comment on and one matter in which we wish to make a general comment.

As a general comment, we note the Minister and the Department are aware of the restrictive nature of enrolment caps. We appreciate the fact that matter was considered and we understand the legal restraint which prevented the address of this matter. We appreciate the ability within the proposed guidelines on an annual basis, subject to complying construction, to increase the cap limit at 10% increments over time and trust that this will meet the needs of most schools.

Specifically we seek clarification in respect of two areas

Matter 1 – Certification of developments

The documentation is technically unclear as to what authority can ultimately certify the self-assessment of a development. We understood that it was intended that schools could seek their own qualified building and environmental contractor to certify compliance and assessment, or have local Council certify the assessment. The documentation could be interpreted to read that the local Council is the only certifier of assessments. This position is not as we understood.

We would like it clearer, (unless we misunderstood) that that the certifier at the end of each process could be the local Council or a suitably qualified independent certifier contracted by the school or preschool.

Matter 2 – Security infrastructure

Under the category of development without consent (section 2.2 1 (b) ii, of the Part 5 Code of Practise), it states that alterations or additions to address work health and safety requirements or to provide access to people with a disability are considered appropriate in that category. This section or wording is similar to that currently in place as a part of local Government assessment criteria.

We are aware that some schools experienced difficulty or in fact had to amend recommend security proposals, as local Government did not consider “security infrastructure” as a health and safety measure within the meaning of the guidelines used.

We discussed this matter with Department representatives when we met, and a specific note was so made in one of our formal submissions. We seek inclusion in that section of security related infrastructure, specifically, or a definitional understanding that security related infrastructure complies within the meaning of that section.

The security related issues referred are matters to which expert opinion has been sought and for which Australian Government funding has been provided to assist the school in mitigating the risks associated to racial or religious indolence.

We are happy to discuss any element of this submission if you have any queries and ask that you do not hesitate in contacting me should that be the case.

Yours Sincerely


Leonard Hain
Executive Director
Australian Council of Jewish Schools



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