

Cranbrook School Compliance Assessment

Issues/concerns identified:

- [ABC TV Four Corners 'Old School'](#) episode into allegations of toxic culture and bullying at Cranbrook School (4 March 2026) and various related media articles including:
 - [Former female staff at Sydney's elite Cranbrook School warn of 'toxic' culture as it prepares to go co-ed](#) (ABC News, 4 March 2024);
 - [Cranbrook school principal resigns over allegations he knew about teacher's 'extremely concerning past conduct'](#) (The Guardian, 8 March 2024); and
 - [Cranbrook School Council announces independent review into handling of any serious child safety allegations](#) (ABC News, 11 March 2024).

Requirements under the *Australian Education Act 2013* and the *Australian Education Regulations 2023* being considered

- Section 75 (5) of the Act – fit and proper person (people, governance, and financial management).
- Section 28 of the Regulations sets out the main requirements for fit and proper person. This includes:
 - the experience and expertise of Cranbrook School, and key individuals at the school, in administering the school and providing school education (section 28(1)(a));
 - the governance arrangements at Cranbrook School, including arrangements for managing and supervising the provision of education at the school (section 28(1)(b)(i)); and
 - whether Cranbrook School, or key individuals of Cranbrook School, have engaged in a deliberate pattern of immoral or unethical behaviour (section 28(2)(e)).

Date	Information requested by the department	Summary of information provided by Cranbrook School
12 March 2024	Policies and procedures in handling misconduct (Q1-5): 1. What are Cranbrook School's policies and procedures in relation to handling of allegations of student, teacher, employee, or other person misconduct? Please explain and provide relevant copies of documents. 2. Who is the complaint or allegation of misconduct reported to? Please explain and provide relevant copies of documents.	General policies and procedures provided • Teaching at Cranbrook letter • Behaviour Management • Anti-Bullying Guidelines – Junior School • Behaviour Support Stages Policy – Junior School • Bullying and Harassment Policy – Students • Bullying Policy – Staff • Code of Conduct – Junior School • Code of Responsibilities and Standards of Behaviour for Students • Complaints and Dispute Resolution Guide

	3. How does Cranbrook School investigate complaints or allegations of misconduct? What processes/criteria are used for such investigations? This is in relation to welfare matters, bullying, harassment, and other forms of behaviour considered not compliant with school values? Please explain and provide relevant copies of documents. 4. Are there internal formal investigations, and what is the decision-making process in assessing complaints or allegations of misconduct by a student, teacher, employee, or other person? Please explain and provide relevant copies of documents. 5. What mechanisms are there in place for a student, teacher, employee, or other person seeking feedback or a review of any internal formal investigations? Please explain and provide relevant copies of documents.	• Enrolment Terms and Conditions • Enrolment Terms and Conditions Overseas Students • Full Fee Paying Overseas Students: Complaints and Appeals Policy • Handling Allegations of Staff Misconduct and Reportable Conduct Policy • Harassment Policy • Internal Grievance Resolution Policy • Parent Code of Conduct • Parent Communication Policy • Senior School – Behavioural Expectations Policy • Senior School – Bullying and Harassment Policy • Senior School – Expectations of Students • Senior School – Diary Behaviour and Consequences • Staff and Students Professional Boundaries Policy • Staff Code of Conduct • Student Discipline Policy • Suspension and Expulsion Procedure • Suspension and Detention Policy • What To Do If You Feel You Have Been Discriminated • Whistleblowing Policy. Child protection policies and procedures provided • Child Abuse and Harm Definitions, Identification, and Initial Responses Policy • Child Protection Compliance Policy • Child Safety Commitment Statement • Child Safety Statement • Detecting, Reporting and Addressing Grooming Behaviours Policy • Duty to Protect Students from Child Abuse or Harm Policy • Guide for Managing Incidents of Problematic Sexualised Behaviour Between Peers • Handling Allegations of Staff Misconduct and Reportable Conduct Policy • Information Sharing About Student Safety and Wellbeing Policy • Mandatory Reporting of Child Abuse Offences to Police Policy • Mandatory Reporting of Child Abuse or Harm to DCJ Policy
--	---	--

- | | | |
|--|--|---|
| | | <ul style="list-style-type: none">• Reportable Conduct Policy• Staff and Students Professional Boundaries Policy• Working With Children Checks Policy March 2022. <p>ss 47E(d) and 47G(1)</p> |
|--|--|---|

Implementation/review of policies and procedures in handling misconduct (Q6-9):

6. Are welfare strategies, policies and procedures regularly reviewed to ensure their effectiveness? What internal mechanisms and implementation of policies and review are in place? Please explain and provide relevant copies of documents.
7. Are reviews of welfare strategies, policies and procedures conveyed to students, teachers, staff, and parents? Are these stakeholders able to provide feedback on the implementation of existing welfare strategies, policies, and procedures? Please explain and provide relevant copies of documents.
8. How are complaints, welfare matters, bullying, harassment, and other forms of behaviour deemed not compliant with school values of students, teachers, staff, and parents dealt with at Cranbrook School? Please explain and provide relevant copies of documents.
9. Are complaints, welfare matters, bullying, harassment, and other forms of behaviour deemed not compliant with school values of students, teachers, staff, and parents formally recorded at Cranbrook School? If so, how are these recorded and processed?

Systemic issues in handling misconduct (Q10-13):

10. How many allegations have been raised regarding bullying, harassment, and sexual abuse involving students, teachers, other employees, and persons?
11. How many of these were formally investigated by the Cranbrook School? How many were referred to external parties, for example the police or other enforcement or regulatory body?
12. Please describe the nature of these allegations and investigations.
 - a. Based on these internal or external investigations, did the outcome result in any disciplinary action, legal undertakings, financial disbursements, student being expelled, or employment being ceased for a teacher/other employee?
13. Did the Council of the Cranbrook School oversee any of the investigations? Were reports provided to the Council on bullying, harassment, and sexual abuse matters? What decisions, if any, were made by the Council in relation to these matters during meetings of the Council. Please provide copies of relevant board minutes since 2017.

ss 47E(d) and 47G(1)

	Involvement of the AISNSW (Q14-17): 14. What process and decision-making were undertaken by Cranbrook School to engage the services of the AISNSW to investigate the claims of unethical conduct by a serving teacher at Cranbrook School? 15. How was information obtained by the AISNSW for the investigation?

	16. Please provide the department with a copy of the report and the findings of the AISNSW investigation. Please redact and de-identify any personal information. 17. Is AISNSW undertaking any current investigations for the Cranbrook School?		
	<table border="1"> <tr> <td data-bbox="273 1241 1057 1388"> Reported independent external review (Q18-21): 18. Who has Cranbrook School engaged to undertake the review? </td><td data-bbox="1057 1241 2145 1388"> Reviewers engaged Two law firms: MinterEllison and Thomson Geer, with Dr Amanda Bell AO. Terms of reference </td></tr> </table>	Reported independent external review (Q18-21): 18. Who has Cranbrook School engaged to undertake the review?	Reviewers engaged Two law firms: MinterEllison and Thomson Geer, with Dr Amanda Bell AO. Terms of reference
Reported independent external review (Q18-21): 18. Who has Cranbrook School engaged to undertake the review?	Reviewers engaged Two law firms: MinterEllison and Thomson Geer, with Dr Amanda Bell AO. Terms of reference		

	19. What are the Terms of Reference? Please provide a copy. 20. What are the timelines for the finalisation of this review? 21. Once the review is finalised and considered by the Council, please provide the department a copy of the review.	• MinterEllison: ss 45, 47E(d) and 47G(1) of reference. • Thomson Geer and Dr Bell: ○ Concerns Review: ss 45, 47E(d) and 47G(1) ○ Policy Review: ss 45, 47E(d) and 47G(1) ss 45, 47E(d) and 47G(1) no written terms
31 May 2024	Involvement of the AISNSW (Q1-6): 1. (a) How did Cranbrook School decide to engage the services of AISNSW to investigate the claims of unethical conduct by a serving teacher at Cranbrook School in 2015? How was this decision made by the headmaster of Cranbrook School as indicated in your response. What procedures were followed? (b) Please provide copies of any emails/letters or other correspondence between AISNSW and Cranbrook School in the context of engaging AISNSW as the external investigator for the 2015 investigation. (c) Were there any other organisations that were considered by Cranbrook School prior to engaging AISNSW for this 2015 investigation? 2. In relation to your response to question 15 of my letter of 12 March 2024:	ss 47E(d) and 47G(1)

	(a) Did AISNSW provide an investigation plan or draft report for its 2015 investigation? ss 47E(d) and 47G(1) (b) Was there a terms of reference for the investigation? (c) What was the contract value of the investigation? Please provide a copy of the contract/engagement agreement. 3. In relation to your response to question 16 of my letter of 12 March 2024: (a) In light of the investigation undertaken by AISNSW and the final investigation report provided to Cranbrook School: i. How did the decision maker (the Headmaster) consider the report and findings of AISNSW? Was there any consultation or discussion on the AISNSW investigation within Cranbrook School. Provide details, including any formal minutes. ii. How did Cranbrook School ensure the relevant legislative obligations and reporting requirements relating to the matter were met in relation to the NSW Reportable Conduct Scheme? (b) What action, if any, was taken in regard to the staff member? Please provide copies of relevant documents. ss 45, 47E(d) and 47G(1) (c) Was there any correspondence between Cranbrook School (current employer) and Mount St Benedict (former employer) in relation to the staff member? Please provide copies of any correspondence. (d) Were any specific strategies or policies implemented or reviewed by Cranbrook School during and after the investigation?
--	--

	(e) Was any guidance or advice provided by the relevant NSW authorities in relation to the NSW Reportable Conduct Scheme or other requirements, including any advice regarding managing risk. Please provide copies of relevant documents. 4. In relation to your response to question 17 of my letter of 12 March 2024: a. Has AISNSW undertaken any investigations for Cranbrook School since 2015? If so, please provide details and context of the investigations and outcomes. 5. In relation to your response to question 19 of my letter of 12 March 2024, you noted that “There are no written terms of reference for MinterEllison's engagement.” a. Please provide a copy of the contract between Cranbrook School and MinterEllison that details the work requirements and milestones to be delivered by MinterEllison. 6. In relation to questions 20 and 21 of my letter of 12 March 2024, you noted that “MinterEllison’s review is expected to be finalised end of April 2024” and that you “anticipate that Thomson Geer's Concerns Review and the Policy Review will take between three and four months from the start of April 2024”. a. Please provide a status update on these reviews and the current timelines.	
28 November 2024	Policies and procedures in handling misconduct: 1. Who oversees the application of all policies and procedures in practice to ensure they are	ss 47E(d) and 47G(1)

	implemented for their intended purpose, and how is this governed? ss 47E(d) and 47G(1) (a) What is the School Council's role in the review and implementation of policies and procedures? (b) How does the School Council satisfy itself that the policies and procedures in place are fit for purpose? 2. When the decision maker (either the Head of School or President of the School) determines whether an investigation into alleged misconduct by students, teachers, employees, or other persons is required, and if so, whether the investigation is to be conducted internally or by an external investigator: i. How is the decision recorded? Is the decision made solely by the decision maker? ii. Are these decisions reviewed and reported to the School Council? 3. Which individuals are appointed to conduct internal investigations into alleged misconduct by students, teachers, employees, or other persons? i. What training and qualifications are these individuals required to have to ensure they are appropriately qualified to undertake such investigations? ii. How does Cranbrook School ensure these individuals are appropriately qualified, have the relevant experience to undertake such investigations and that no conflicts of interest exist between parties involved?
--	--

ss 47E(d) and 47G(1)

- | | |
|--|---|
| | <p>4. When an investigation is undertaken under the general investigation process, including both internal and external investigations:</p> <ul style="list-style-type: none">iii. Who is responsible for overseeing the investigation?iv. ii. What is the decision-making process and who is responsible for considering the written report and findings and determines the final findings?v. iii. Once final findings are made, who is responsible for providing the findings to the person whom the allegations are made, advising of the preliminary view regarding any action and considering any response before making a final decision?vi. iv. What is the process and who is responsible for making the final decision? |
|--|---|

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

	Independent external review reports
	8. Please provide the department with copies of the MinterEllison and Thomson Geer Review Reports.
ss 47E(d) and 47G(1)	

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

s 47G(1)

MinterEllison Review Report
ss 42, 45, 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

Thomson Geer Review Report

ss 42, 45, 47E(d) and 47G(1)

Reports submitted by members of the Cranbrook School community

3. The Thomson Geer Review Report notes that of the 76 reports received, ss 42, 45, 47E(d) and 47G(1)

Pages 17 to 18 redacted under ss 42, 45, 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 45, 47E(d) and 47G(1)

Thomson Geer Review Report summary

Concerns Review via Your Call/Rely platform

76 reports were submitted between April–July 2024. ss 42, 45, 47E(d) and 47G(1)
ss 42, 45, 47E(d) and 47G(1)

Pages 24 to 25 redacted under ss 42, 45, 47E(d) and 47G(1)

NESA With Cause Investigation Report for Cranbrook School summary

Purpose of the investigation

The NSW Education Standards Authority (NESA) conducted a "with cause" investigation into Cranbrook School, following concerns raised in media reports, particularly an ABC Four Corners episode titled "*Old School*" aired on 4 March 2024. The investigation focused on the school's compliance with registration requirements for Non-Government schools, specifically regarding the provision of a safe and supportive environment.

School context

- Cranbrook School is registered for Kindergarten to Year 12 and accredited for the Record of School Achievement and Higher School Certificate until 31 December 2027.
- The school includes approved boarding facilities.
- The last inspection in August 2022 found no non-compliance.

Background to investigation

- Media reports raised concerns about:
 - Staff grievances and workplace culture.
 - Allegations of sexual abuse of a boarding student (circa 2013).
 - Conduct of a teacher in 2014–15 involving a former student from another school.
- NESA's regulatory scope excludes criminal investigations and historical allegations but assesses current compliance risks.

ss 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

Departmental recommendation

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

Pages 34 to 35 redacted under ss 47E(d) and 47G(1)

OFFICIAL



Australian Government
Department of Education

Our Ref: AGEID 22073

s 22 , Compliance and Reviews
s 22

Dr Anne Johnstone
Head of School
Approved Authority Representative
Cranbrook School
BELLEVUE HILL
NSW 2023

By email: s 47F @cranbrook.nsw.edu.au
Copy to: s 47F @cranbrook.nsw.edu.au; s 47F @cranbrook.nsw.edu.au;
s 47F @cranbrook.nsw.edu.au

Dear Dr Johnstone

Outcome Letter – Compliance Review under the *Australian Education Act 2013*

I am writing to you as the contact officer and the approved authority representative for Cranbrook School under the *Australian Education Act 2013* (the Act).

The purpose of this letter is to advise Cranbrook School of the outcome of the review undertaken by the Australian Government Department of Education (the department).

The department is responsible for the administration and payments of Commonwealth funding under the Act and the Australian Education Regulations 2023 (the Regulations). The Act sets out the basic and ongoing requirements for approved authorities to receive funding. These requirements are:

- being a body corporate (section 75(2) of the Act)
- not operating for-profit (section 75(3) of the Act)
- financial viability (section 75(4) of the Act)
- fit and proper person (people, governance, and financial management) (section 75(5) of the Act)
- meeting ongoing policy requirements (section 77 of the Act).

OFFICIAL

OFFICIAL

Section 28 of the Regulations sets out the main requirements for a fit and proper person. In relation to Cranbrook School, the following requirements were considered:

- the experience and expertise of the school, and key individuals at the school, in administering the school and providing school education (section 28(1)(a))
- the governance arrangements at the school, including arrangements for managing and supervising the provision of education at the school (section 28(1)(b)(i))
- whether the school, or key individuals of Cranbrook School, have engaged in a deliberate pattern of immoral or unethical behaviour (section 28(2)(e)).

Department's request for information

On 12 March 2024, the department wrote to Cranbrook School under section 39A of the Regulations requesting information following an ABC TV Four Corners episode concerning allegations of a toxic culture and bullying at Cranbrook School as well as various other media articles, including:

- Lyons, K (8 March 2024). 'Cranbrook school principal resigns over allegations he knew about teacher's extremely concerning past conduct'. **The Guardian**.
<https://www.theguardian.com/australia-news/2024/mar/08/cranbrook-school-principal-nicholas-sampson-resigns>
- Gregory, X (11 March 2024). 'Cranbrook School Council announces independent review into handling of any serious child safety allegation'. **Australian Broadcasting Corporation News**.
<https://www.abc.net.au/news/2024-03-11/nsw-sydney-cranbrook-school-independent-review-announced/103572482>

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

ss 42, 45, 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

OFFICIAL

ss 47E(d) and 47G(1)

If you have any questions, please email SchoolsAssuranceCases@education.gov.au.

Yours sincerely

s 22

1 October 2025

Priority Cases – 2 October 2025

Priority Cases..... 1

s 22

Cranbrook School..... 3

s 22

Priority Cases

s 22

s 22

Pages 44 to 49 redacted under s 22



Australian Government
Department of Education

Meeting record for Commonwealth information sharing meeting
with NESA

Time/Date	10:30am, Friday 14 November 2025		
Location	Microsoft Teams		
Attendees	- s 22 - s 47F	Commonwealth Department of Education New South Wales Education Standards Authority (NESA)	
Apologies	- s 22 - s 47F	, Department of Education , NESA	

[Link to the record of the last monthly meeting in October 2025.](#)

Commonwealth Department of Education update

s 22

s 22

ss 47E(d) and 47G(1)

s 22

School Assurance Branch

Priority Cases Weekly Report – 27 August 2026

Priority Cases 1

s 22

Cranbrook School 4

s 22

Priority Cases

s 22

s 22

Cranbrook School

Personal Information has been removed
under s 11(C)(1)(a) of the FOI Act 1982

has submitted a Freedom of Information (FoI) request and ministerial correspondence seeking information relating to the department's compliance review and subsequent regulatory actions for Cranbrook School.

- In July, the department responded to a parliamentary question from Australian Greens Senator Penny Allman-Payne regarding its investigation into Cranbrook School's compliance with 'fit and proper person' requirements under the Act.

ss 47E(d) and 47G(1)

ss 47E(d) and 47G(1)

s 22

