

Chapter 4 Education—Overseeing Independent Schools

1.0 MAIN POINTS

Independent schools are private institutions owned by a person or an organization that provide educational instruction to students of compulsory school age (i.e., between the ages of six and 16) and are controlled and administered by an entity other than a government agency.¹

An independent school must be registered with the Ministry of Education in order to educate students in the province. There were 54 independent schools across Saskatchewan as of January 2025 providing educational instruction to over 5,400 students. For some of these independent schools, the Ministry provided \$31 million for the 2024–25 school year.

We found the Ministry of Education had effective processes to oversee independent schools educating students in Saskatchewan, except it needs to:

- Analyze and report on key indicators of student achievement (e.g., students reading at or above grade level) at independent schools.

Insufficient reporting on independent school student achievement may impact the Ministry's ability to make informed decisions or provide additional supports (e.g., training to uncertified teachers) to help ensure students receive a quality education.

- Complete school risk assessments for all independent schools as well as centrally track and use them to determine necessary school inspections.

Maintaining risk-based plans for inspecting independent schools can help the Ministry prioritize resources and focus on schools presenting higher risks to educational quality, student safety, and regulatory compliance. We found the Ministry did not consider student achievement as part of its risk assessment process.

- Centrally compile identified non-compliance for all independent schools.

Without centrally tracking non-compliance notices to schools, the Ministry may be unable to identify trends occurring or be slow in responding to outstanding compliance matters at independent schools.

Having effective processes to oversee independent schools helps ensure students receive quality education and public funds are used for intended purposes.

¹ Ministry of Education, *The Registered Independent Schools Policy and Procedure Manual*, p. 3.



2.0 INTRODUCTION

2.1 Ministry of Education Responsibilities for Independent Schools

The Education Act, 1995, assigns responsibility to the Minister of Education to oversee all matters related to the elementary and secondary education system in Saskatchewan and allows that the Minister may do any things they consider advisable to carry out that responsibility.²

The Registered Independent Schools Regulations (amended in 2023) describe requirements for the registration, supervision, inspection, and administration of independent schools in Saskatchewan, such as operating school facilities that meet safety, health, and construction standards, and enrolling full-time students between the ages of six and 21 from at least three different families.³

These requirements differ based on the category of independent school of which there are six different categories in the province (see **Figure 1**), including registered, alternative, historical high school, qualified, certified, and associate.⁴ Our audit did not include associate schools (8 schools in 2025) as school divisions are responsible for overseeing and funding associate schools (grey shaded in **Figure 1**).

Figure 1—Categories of Independent Schools and Key Operating Requirements

Category	Use Certified Teachers ^A	Teacher Criminal Record Checks	Ministry Funded	Follow Saskatchewan Curriculum	Annual Inspections	Required Routine Ministry Inspections (Other than Annual Inspection)
Registered	No – Religiously based schools Yes – Non-Religiously based schools (none at January 2025)	Yes	No	No – But must provide seven required areas of study ^B	Yes	No
Alternative	Yes	Yes	Yes	Yes	Yes	No
Historical High School	Yes	Yes	Yes	Yes	Yes ^C	Yes ^C
Qualified	Yes	Yes	Yes	Yes	Yes	Yes
Certified	Yes	Yes	Yes	Yes	Yes	Yes
Associate	Yes	Yes	Yes	Yes	Yes	No

Source: Adapted from Ministry of Education records.

^A Certified teachers are those teachers holding a Professional A Certificate, Probationary B Certificate, or a Temporary Teaching Permit issued by the Saskatchewan Professional Teachers Regulatory Board. See **Figure 5** for further details.

^B Required areas of study: science, English language arts, math, social studies, arts education, health, and physical education.

^C Ministry-approved supervisors perform inspections, not Ministry staff.

² *The Education Act, 1995*, sections 3 and 4.

³ *The Registered Independent Schools Regulations*, s. 5.

⁴ **Alternative schools** typically educate students who are wards of the province or who require educational programming in a non-traditional education environment. **Historical high schools** denote schools with long standing historical arrangements that were continued when independent school legislation was enacted in 1989. **Qualified schools** meet basic eligibility requirements for registered independent schools including specific additional criteria (e.g., operating as registered independent school for two years or more, implementing financial reporting). **Certified schools** are qualified independent schools that become eligible to receive increased provincial funding if they meet specific additional criteria (e.g., operating as registered independent school for five years or more, implementing increased financial reporting, complying with all Ministry of Education policies and directives).

Independent schools must operate in accordance with the Ministry's *Registered Independent Schools Policy and Procedure Manual*.⁵ The Manual provides independent school owners and/or operators, directors, principals, and teachers with information regarding the policies, procedures, and legislative requirements to own and/or operate an independent school in Saskatchewan.

If the independent school also provides online learning, it would also be required to comply with the Ministry's *Quality Assurance Framework for K–12 Online Learning*.⁶ One independent school offered online learning during 2024.

Independent schools generally receive funding through tuition fees, private donations, or other non-governmental sources. The Government of Saskatchewan may also provide grants to certain independent schools. Its funding of independent schools varies depending on the nature of the school or the type of registration it holds with the Ministry. **Figure 2** outlines the number of independent schools by category as well as Ministry funding provided for the 2024–25 school year, which amounted to approximately \$31 million.

Figure 2—Number of Independent Schools, Students, and Ministry Funding for 2024–25

School Category	Number of Schools	Number of Students	Funding (in millions)
Registered	14	386	--
Alternative	8	273	7.95
Historical High School	4	700	5.82
Qualified	17	1,056	7.70
Certified	3	878	9.50
Associate ^A	8	2,174	--
Total	54	5,467	\$ 30.97

Source: Adapted from Ministry of Education records.

^A School divisions are responsible for overseeing and funding associate schools therefore our audit did not include them.

The Ministry assigned responsibility for overseeing independent schools to its Programs Branch.

2.2 Importance of Independent School Oversight

The Ministry of Education is entrusted with ensuring that all students in Saskatchewan have access to proper education and that schools adhere to the established standards.

Independent schools give parents and caregivers the opportunity to educate children according to their beliefs, including specialized curriculum, smaller class sizes, and the option for a religious or alternative educational approach. Churches, denominations, and religious societies can operate these schools, and do not always need to fully align with public education practices.⁷ Given that an independent school is owned and operated by a person or an organization other than a public authority or government, operational requirements may be more stringent or less, or inconsistent with, a school operated by a school division.

⁵ publications.saskatchewan.ca/#/products/74251 (18 March 2025).

⁶ *Quality Assurance Framework for K-12 Online Learning* (18 March 2025).

⁷ publications.saskatchewan.ca/api/v1/products/77602/formats/86999/download (18 March 2025).



In December 2023, the Office of the Saskatchewan Advocate for Children and Youth completed a 124-page report titled *Making the Grade: Moving Forward in Independent Education*.⁸ The report included 36 recommendations for the Ministry of Education in key areas such as inspections and supervision, learning environments, teacher qualifications, curriculum and learning, and data tracking related to student outcomes. This report and its recommendations highlighted the need for effective oversight of independent schools to ensure a supportive environment for independent school students.

The Ministry also needs to monitor that public funding provided to independent schools is used for intended purposes.

Having effective processes to oversee independent schools reduce the risk students do not receive a quality education in an environment not conducive to learning and that public funds are not used for intended purposes.

3.0 AUDIT CONCLUSION

We concluded that the Ministry of Education had effective processes to oversee independent schools educating students in Saskatchewan for the period ending January 31, 2025, except in the following areas:

The Ministry of Education needs to:

- **Analyze and report on independent school student achievement**
- **Complete school risk assessments**
- **Use centrally tracked risk ratings to determine necessary school inspections**
- **Centrally compile identified non-compliance for all independent schools**

Figure 3—Audit Objective, Criteria, and Approach

Audit Objective:

To assess whether the Ministry of Education has effective processes to oversee independent schools educating students in Saskatchewan for the period ending January 31, 2025.

Audit Criteria:

Processes to:

- 1. Establish appropriate oversight framework for monitoring independent schools**
 - Set clear eligibility and ongoing operating requirements for independent schools consistent with legislation and good practice
 - Register independent schools that meet requirements
 - Establish appropriate agreements with independent schools (e.g., funding, reporting requirements, Ministry inspections, administrative policies and procedures)
- 2. Monitor independent school compliance with established operating requirements**
 - Set comprehensive guidance for monitoring compliance with operating requirements (e.g., checklists, inspection procedures)
 - Set risk-based plans for inspecting independent schools
 - Regularly assess compliance with operating requirements (e.g., use of funding, qualified teachers, student achievement, criminal record checks, appropriate curriculum)

⁸ saskadvocate.ca/making-the-grade-moving-forward-in-independent-education/ (28 March 2025).

3. Report on independent school operations and address any non-compliance identified

- Require prompt action on non-compliance
- Track and investigate complaints about independent schools in a timely manner
- Take corrective action on continued non-compliance (e.g., cancel, suspend or deregister)
- Report on independent school operations and non-compliance to senior management and the public

Audit Approach:

To conduct this audit, we followed the standards for assurance engagements published in the *CPA Canada Handbook—Assurance* (CSAE 3001). To evaluate the Ministry of Education's processes, we used the above criteria based on our related work, review of relevant literature including reports of other auditors, and consultation with management. Ministry management agreed with the above criteria.

We examined the Ministry's processes, policies, and procedures relating to oversight of independent schools. We interviewed Ministry staff responsible for overseeing independent schools and we assessed the Ministry's processes for supervising and inspecting independent schools. We observed Ministry on-site inspection of an independent school. We tested a sample of independent school applications, complaints, and inspections to verify the Ministry followed its processes. We also performed a jurisdictional review of Canadian provinces to determine whether requirements for independent schools in Saskatchewan are consistent with other provinces.

4.0 KEY FINDINGS AND RECOMMENDATIONS

4.1 Clear Eligibility Requirements Established and Communicated

The Ministry of Education established and communicated clear eligibility requirements to own and/or operate independent schools in Saskatchewan. Ministry staff assess applicant schools against these requirements when approving new independent schools and when conducting initial inspections at new independent schools.

An independent school must be registered with the Ministry in order to educate students in the province.

The Ministry appropriately communicates its established eligibility requirements to potential applicants in *The Registered Independent Schools Regulations*, *Independent Schools Registration Handbook*, and *The Registered Independent Schools Policy and Procedure Manual*. **Figure 4** provides an overview of independent school eligibility requirements.

Figure 4—Eligibility Requirements for Independent Schools

- School is owned and/or operated by a corporation (incorporated and operates in Saskatchewan)
- School has a board comprised of a minimum of three adults from three separate households
- By the start of the next school year, the applicant school has enrolled at least seven students between the ages of 6 and 21 from at least three separate households
- School meets fire, health, and safety standards
- Goals of Education for the school are not inconsistent with the province-wide Goals of Education for Saskatchewan^A
- School name is distinct from other schools, and reflects the level of education provided (i.e., does not use the word 'university' or 'college')
- Not owned or operated by an Indian Band (i.e., First Nation) as defined in the *Indian Act* (Canada)^B
- Does not hold a certificate of registration suspended or cancelled within the last 24 months

Source: *The Registered Independent Schools Regulations*, s. 5.

^A Goals of Education state what the school is working toward in educating its students (e.g., basic skills such as reading and writing, life-long learning, understanding and relating to others); the Ministry of Education lists these goals in the independent school application form.

^B Schools operated by First Nations are under federal jurisdiction.



We assessed the Ministry's guidance documents (Regulations, Handbook, Manual) and found they were clear, comprehensive, and generally consistent with other Canadian jurisdictions (e.g., British Columbia, Alberta). Additionally, eligibility requirements were consistent with *The Registered Independent Schools Regulations* and made available to potential applicants on the Government of Saskatchewan's website.⁹

When a new independent school applies for registration, it provides the Ministry with an application package containing information outlined in **Figure 4**. Staff use established guidance (i.e., checklists) to assess whether the new school meets requirements for an independent school. The Ministry also follows up with applicants if they missed any information in their application package.

The Ministry approved no new independent schools that began operations over the past three years.

At January 2025, the Ministry had six new independent school applicants going through the registration approval process for the 2025–26 school year (anticipating operation beginning September 2025). Applications were at various stages in the approval process. For two of the new independent school applicants we examined, we saw evidence the Ministry reviewed applications, followed up with applicants for missing information, and informed applicants of next steps in the process.

One of the six new applicants had already been approved by the Ministry to operate in a prior school year. However, the Ministry subsequently revoked its registration due to the school reporting it could not find a suitable principal. We found the Ministry followed its established process to approve the school's initial application. Once the school informed the Ministry it had been unable to fill the principal role, the Ministry subsequently cancelled the registration (prior to the school operating).

Having robust eligibility requirements for independent schools consistent with legislation and good practice help ensure students receive education in an environment conducive to learning. Clear communication of those requirements helps independent schools understand the requirements and their responsibility to comply.

4.2 Sufficient Operating Requirements Established

The Ministry of Education established clear operating requirements (e.g., board composition, minimum number of students, health and safety inspections) for independent schools and communicated changes made to operating requirements in a timely manner.

⁹ saskatchewan.ca/government/education-and-child-care/facility-administration/services-for-school-administrators/registered-independent-schools (28 March 2025).

4.2.1 Ongoing Operating Requirements

Key operating requirements for independent schools are listed in **Figure 1**. These include obtaining teacher criminal record checks, being inspected annually for all independent schools as well as, for some independent schools, following Saskatchewan curriculum and using certified teachers. Along with these requirements, independent schools must:¹⁰

- Post the school's policy regarding student and/or parent complaints and grievances at the school and include this information in the student registration package.
- Have administrative policies (e.g., student and staff safety, violence, student records) visible in key areas at the school.
- Provide the Ministry with statements of revenue and expenses, including audited financial statements by October 1 each year (only Ministry-funded schools).
- Provide the Ministry with an annual calendar of operating hours (i.e., school days, professional development days, statutory holidays, school opening and closing hours) by May 1 each year.
- Provide course descriptions to the Ministry for review and approval for schools offering secondary (i.e., high school) level credits. Additionally, these schools must annually upload credits for students in Grades 10–12 to the Ministry's IT system.¹¹
- Annually input student reading level data (Grades 1–3) in the Ministry's IT system.
- Make student assessments (i.e., tests, quizzes, report cards) available for review during Ministry inspections.
- Complete an annual return and submit to the Ministry by September 15 each year.¹²
- Conduct 10 fire and four lockdown drills each year.

Ministry staff verify independent schools follow operating requirements during inspections (see **Section 4.7**).

The Ministry provided independent schools with examples of administrative policies it expected them to follow (same policies it expects school divisions to follow adapted as necessary to apply to independent schools). For example, the Ministry made some policies optional for independent schools to follow such as bus maintenance (e.g., if the independent school does not offer transportation for its students, a bus maintenance policy is not needed). The Ministry emailed or hand-delivered these policies to independent schools. We observed, at the one qualified independent school we visited, that the school had the mandatory administrative policies.

¹⁰ Adapted from Ministry of Education records.

¹¹ In Saskatchewan, students have to pass certain courses such as English language arts, math and science in order to graduate with a Grade 12 education. Students must successfully complete and pass 24 course credits. Each course passed provides the student with one course credit. www.saskatchewan.ca/residents/education-and-learning/credits-degrees-and-transcripts/high-school-credit-options (10 April 2025).

¹² Annual returns require independent schools to disclose school information (e.g., address, name, year founded), student demographics (e.g., number of students, whether students reside at the school), grades taught, school operations (e.g., non-profit corporation in good standing, cumulative records securely stored onsite, criminal record checks for all staff), information about the board, and information about the school administration (e.g., principal and school director name and contact information).



We found the Ministry appropriately communicated changes in operating requirements to existing independent schools timely through email. We reviewed emails the Ministry sent to independent schools in November 2022 informing them of changes to *The Registered Independent Schools Regulations* effective September 1, 2023. For example, the entity which operates a school must be separate from the Church, must immediately inform the Ministry of instances of criminal activity, and provide the Ministry with core learning resources (e.g., assignments, textbooks, workbooks) for review every five years. The communication from the Ministry clearly outlined these changes and the impact on school operations.

In 2008, Ministry staff conducted an interjurisdictional review of Canadian provinces to determine operating requirements and funding levels provided to independent schools in other jurisdictions. At that time, the Ministry's review found Saskatchewan generally consistent with other jurisdictions. Our analysis found Saskatchewan's funding levels for independent schools still consistent with other jurisdictions, but some inconsistencies in operating requirements (e.g., teacher qualifications) exist (see **Section 4.2.2**).

While the Ministry indicated it performs informal, periodic scans of practices in other jurisdictions, we did not see evidence of this occurring. We suggest the Ministry document its future interjurisdictional analysis. Periodically conducting and documenting interjurisdictional scans help the Ministry determine whether other provinces' requirements for independent schools changed, understand rationale for changes made, and consider whether similar changes should be implemented in Saskatchewan.

The Ministry informally reviews its guidance and processes every year. Management indicated that starting in 2024–25, it plans to formally review curriculum of qualified and certified independent schools every five years to ensure alignment with legislation and good practice (e.g., reviewing Grades 10–12 math and science courses in the 2024–25 school year).¹³

4.2.2 Teachers at Religiously Based Registered Independent Schools Not Certified

The Ministry of Education, through *The Registered Independent Schools Regulations*, requires all teachers at independent schools to be certified (i.e., by the Saskatchewan Professional Teachers Regulatory Board), except for religiously based registered independent schools.¹⁴ These schools are not required to use certified teachers, rather they must have teachers obtain a Letter of Eligibility from the Ministry.

¹³ The Ministry of Education reviews curriculum for qualified and certified independent schools (not all independent schools) as registered independent schools are not required to follow the Saskatchewan curriculum, alternative schools work with students who have educational needs that require a non-traditional learning environment, and historical high schools are supervised by a Ministry-approved supervisor.

¹⁴ The Saskatchewan Professional Teachers Regulatory Board (SPTRB) ensures registered teachers meet professional standards for certification, conduct, and competence. sptrb.ca/SPTRB/About_Us/Mission_and_Vision/SPTRB/About_Us/Mission_and_Vision.aspx?hkey=a206d844-caf2-44e6-85cc-1c04f681dba9 (31 March 2025).

In 1986, the Supreme Court of Canada case *R. v. Jones*, ruled in favour of an Albertan pastor who refused to send his children to public school and instead opened a Baptist school where he educated his children and 20 other students, citing religious freedom in education.¹⁵ Registered independent schools often provide families with a choice for children to be educated in a manner that respects their religious identity, beliefs, and values.¹⁶

While it is important to allow the right to religious freedom in education, it is equally important to respect the United Nations' Committee of the Rights of the Child's requirement that every child has the right to receive a quality education.¹⁷ This requirement expects a focus on the quality of the learning environment, of teaching and learning processes and materials, and of learning outputs.¹⁸ The Ministry requires religiously based independent schools to provide students with education in seven required areas of study: science, English language arts, math, social studies, arts education, health, and physical education.

We conducted a jurisdictional scan of five other provinces (Alberta, British Columbia, Newfoundland and Labrador, Prince Edward Island, and Quebec) and found British Columbia and Alberta allowed uncertified teachers at unfunded religiously based independent schools, while the remaining provinces required certified teachers or teachers with post-secondary education.

To provide education based on faith, religiously based registered independent schools in Saskatchewan can use teachers who are of their faith to provide instruction. Recognizing these schools may have difficulty finding certified teachers with the applicable religious background, the Ministry allows uncertified teachers to instruct at these schools (i.e., issues Letters of Eligibility for those teachers). All other categories of independent schools must use certified teachers. **Figure 5** outlines the differences between these teacher certification requirements.

Figure 5—Teacher Qualification Requirements

Teacher Qualification	Requirements
Professional A Certificate	<ul style="list-style-type: none"> Allows individual to teach all subjects in all grades Requires a university degree (i.e., Bachelor of Education with 48 semester hours of approved teacher education, and academic components specific to elementary and middle school or high school)
Probationary B Certificate	<p>To be eligible for a Probationary B certificate, must meet at least <u>one</u> of the following criteria:</p> <ul style="list-style-type: none"> Hold a teacher's certificate from another Canadian province or territory Hold a degree from a recognized university or college Hold a teaching degree from a denominationally based college Hold a degree or diploma from a Bible school Taught successfully for the equivalent of five or more years in the independent school system In the opinion of the registrar, possess other appropriate qualifications including professional experience or special skills

¹⁵ ca.vlex.com/vid/r-v-jones-681040913 (28 March 2025).

¹⁶ Saskatchewan Advocate for Children and Youth, *Making the Grade: Moving Forward in Independent Education*, p. 24.

¹⁷ The Committee of the Rights of the Child is a United Nations committee that monitors the implementation of the Convention on the Rights of the Child. The Convention outlines that childhood is entitled to special care and attention, including education. www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child (2 April 2025).

¹⁸ Saskatchewan Advocate for Children and Youth, *Making the Grade: Moving Forward in Independent Education*, p. 60.



Teacher Qualification	Requirements
Letter of Eligibility	<ul style="list-style-type: none">• Allows individual to teach elementary-level subject matter in a specific religiously based registered independent school for a five-year period. If the teacher changes schools, they must reapply to teach^A• Must be 18 years of age• Must have a clean criminal record check and vulnerability sector check• Must not have held a previously cancelled teacher's certificate

Source: Saskatchewan Professional Teachers Regulatory Board (SPTRB) and Ministry of Education, *The Registered Independent Schools Policy and Procedure Manual*, p. 61.

^A Annually, the Ministry of Education receives a listing of teachers from each school. The Ministry can determine by reviewing these listings whether a teacher moved to a different school and thus requires a new Letter of Eligibility.

At January 2025, 14 religiously based registered independent schools in Saskatchewan educated approximately 390 students. None of these schools employed certified teachers. The Ministry indicated the majority of students who attend these religiously based registered independent schools do not attend school beyond Grade 9. Religiously based registered independent schools wanting to offer Grades 10–12 must use teachers with at least a Probationary B Certificate (see **Figure 5**).

The Ministry reviews applications for uncertified teachers and approves a Letter of Eligibility if the applicant meets the basic requirements noted in **Figure 5**. The Ministry does not assess whether the individuals have relevant knowledge or experience necessary to teach the seven required areas of study (science, English language arts, math, social studies, arts education, health, and physical education). The Ministry issued 88 Letters of Eligibility to teachers at 14 independent schools from February 2023 to February 2025.

We tested 12 teachers with approved Letters of Eligibility and found all teachers completed criminal record and vulnerability sector checks and were at least 18 years of age. However, we found eight teachers did not graduate high school. We were unable to determine whether this impacted student achievement as the Ministry does not sufficiently monitor and analyze information on key indicators of student achievement at independent schools (e.g., students reading at or above grade level) (see **Section 4.10**). If the Ministry identifies students at these religiously based registered independent schools as underperforming, it should consider providing additional supports (e.g., training for uncertified teachers, conducting more frequent school inspections) to help ensure students are provided with a quality education.

4.3 Qualified Staff Approve and Monitor Independent Schools

The Ministry of Education uses qualified staff to approve new independent schools and monitor independent schools' compliance with legislation and Ministry requirements.

The Ministry's Programs Branch employs three superintendents and an Executive Director to monitor independent schools by inspecting and reviewing reporting submitted by independent schools. It expects these four staff to have extensive academic education and experience in the education sector such as:

- Master of Education degree;
- Professional A Certificate issued pursuant to *The Registered Teachers Act*; and

- A minimum of two years of school administration experience.¹⁹

We found all four staff met these expectations and had more than 30 years of professional experience each.

When a new superintendent begins at the Programs Branch, the Ministry appropriately expects them to job shadow the Executive Director to provide on-the-job experience prior to completing inspections on their own.

Assigning qualified staff to assess independent school applications and monitor ongoing operating requirements helps to ensure independent schools comply with legislation and Ministry requirements.

4.4 Adequate Agreements Established

The Ministry of Education signed adequate agreements with most of its funded independent schools outlining responsibilities of both parties (Ministry and school), annual funding, and reporting requirements. The Ministry drafted an agreement template for historical high schools in March 2025, but the agreements with those schools have not yet been finalized.

In 2024–25, the Ministry established agreements, for the first time, with two categories (qualified, certified) of Ministry-funded independent schools. Key responsibilities of the independent schools outlined in the agreements appropriately included:²⁰

- Agreeing to practice good governance including management of staff and fiduciary responsibility
- Providing all required reports to the Ministry (e.g., financial statements, annual returns, school calendar)
- Maintain registration in good standing in accordance with *The Registered Independent Schools Regulations*

We examined five agreements and found the agreements had sufficient terms and conditions including reporting requirements and timelines, Ministry's ability to audit, and termination clauses. Appropriate personnel (i.e., Executive Director, Programs Branch, and the independent school directors) signed all five agreements.

In March 2025, the Ministry drafted an agreement template for historical high schools consistent with requirements in the other agreements. However, the Ministry had not yet finalized or approved these agreements. We suggest the Ministry finalize and approve its historical high school agreements.

The Ministry establishes funding levels for each category of independent school it funds. These funding levels are based on a per student rate or on specific services (e.g., salaries, benefits, and operational costs for educational programming and intensive supports for alternative independent schools) provided by the independent school (see **Figure 6**).

¹⁹ *The Registered Independent Schools Regulations*, s. 21(2).

²⁰ Adapted from Ministry of Education records.



It sets the per student rates using a percentage of the average per student funding provided to school divisions. We found setting funding for independent schools based on a per student rate or based on specific services consistent with other jurisdictions (e.g., British Columbia, Alberta).

Figure 6—Funding Level by Category of Independent School

Independent School	Funding Level
Qualified	50% of the eligible average per student amount paid to provincial school divisions up to 399 student full-time equivalents (FTEs) and an incremental rate (i.e., additional, lesser amount) applied to any additional students.
Certified	80% of the eligible average per student amount paid to provincial school divisions up to 399 student FTEs and an incremental rate (i.e., additional, lesser amount) applied to any additional students.
Alternative	Subject to provisions included in each individual service agreement. For example, Ellen Gunn Education Centre (Ranch Ehrlo campus in Saskatoon) had a three-year (2024–27) agreement whereby the Ministry pays about \$5.6 million annually.
Historical High School	80% of eligible average per student amount paid to provincial school divisions up to 399 student FTEs and an incremental rate (i.e., additional, lesser amount) applied to any additional students.

Source: Adapted from Ministry of Education records.

Establishing sufficient agreements with independent schools help to ensure accountability, transparency, and effective monitoring of compliance with regulations.

4.5 Risk Ratings Not Determined for All Independent Schools

The Ministry of Education assigned a risk rating to most independent schools but has not yet assigned risk ratings for alternative independent schools.

The Ministry completes periodic onsite inspections of independent schools based on an assigned risk rating. However, the Ministry does not inspect historical high schools. Instead, the Ministry approves supervisors to oversee the inspection and supervision of these schools (e.g., inspections at least annually). The Ministry meets with supervisors at least annually to receive updates on any findings from these inspections.

The Ministry's risk assessment process begins each spring. Ministry superintendents review reported information, complete a risk assessment checklist, and determine whether an elevated level of risk (e.g., significant staff turnover, missed reporting deadlines from agreements, receipt of public complaints over the past two years, findings from previous inspections) exists.

We found the risk factors the Ministry considered in its risk assessments reasonable; however, the Ministry should consider student achievement as part of its risk assessment process (see **Section 4.10**). Monitoring student achievement is key to successful educational outcomes.

The Ministry had not completed risk assessments for the eight alternative independent schools as of March 2025. It told us it plans to complete these assessments in 2025–26. Since the Ministry has not performed risk assessments and has not yet assigned risk

ratings for alternative independent schools, it only inspects these schools annually (see **Section 4.7**). As a result, the Ministry may not be inspecting these schools frequently enough.

Having incomplete risk assessments increase the risk of the Ministry not inspecting riskier schools frequently enough, increasing the risk of deficiencies going unaddressed. Maintaining risk-based plans for inspecting independent schools can help the Ministry prioritize resources and focus on schools that may present higher risks to educational quality, student safety, and regulatory compliance.

1. We recommend the Ministry of Education complete risk assessments for alternative independent schools.

4.6 Central Tracking of Risk Ratings Needed

While the Ministry of Education centrally tracks assigned risk ratings for qualified independent schools, it has not done so for all other categories of independent schools (alternative, certified, registered) it inspects.

The Ministry classifies risk of qualified independent schools as either red (high risk), yellow (medium or moderate risk), or green (low risk) based on its risk assessment process. It tracks the associated risk rating in a central spreadsheet on the Programs Branch's network drive.

The Ministry does not currently track risk ratings centrally for other categories of independent schools such as certified or registered independent schools. Instead, it uses checklists to assess the risk rating and saves its assessment in the independent school's file. The Ministry intends to extend its central tracking process to all schools in phases starting in 2025–26.

Centrally tracking risk assessments would allow the Ministry to more easily identify higher risk schools and assign appropriate resources and inspection frequency to those schools.

2. We recommend the Ministry of Education centrally track its risk ratings for all categories of independent schools.

4.7 School Inspections Based on Risks But Not All Risks Identified

The Ministry of Education appropriately sets its inspection frequency for independent schools based on assigned risk ratings. However, the Ministry does not consider student achievement as part of its risk ratings (see **Section 4.10**), which means some schools may rate at higher risk levels than presently rated. Also, the Ministry has not assigned risk ratings for alternative independent schools and, as a result, the Ministry may not be inspecting these schools frequently enough (see **Section 4.5**).

Superintendents conduct onsite inspections based on the assigned level of risk (i.e., higher risk ratings mean more frequent inspections). This approach aligns with good practice. **Figure 7** outlines the various categories of independent schools, a summary of their associated risk ratings, and the frequency of Ministry school inspections.



Figure 7—Risk Ratings and Frequency of Inspections for the Various Categories of Independent Schools for 2024–25

Category	Risk Ratings	Frequency of Ministry Inspections
Registered	All Low	Annual
Alternative	None (see Recommendation 1 about completing risk assessments)	Annual
Historical High School	All Low	None by the Ministry ^A
Qualified	Some Low, Medium, High	Some annually, some monthly, and some weekly
Certified	Some Low, Medium, High	Some annually, some monthly, and some weekly

Source: Adapted from Ministry of Education records

^A Ministry approved supervisors perform inspections, not Ministry staff.

We found all registered independent schools had low risk ratings assigned at January 2025 (as shown in **Figure 7**). However, because the Ministry does not assess student achievement as part of its risk assessment process, risk ratings may be lower than they should be (see **Recommendation 4** about periodically analyzing independent school student achievement).

Figure 8 outlines the information superintendents verify during annual inspections. The Ministry provides superintendents with appropriate checklists to ensure inspection consistency.

Figure 8—Annual Inspection Requirements

General <ul style="list-style-type: none">• Board members from at least three separate households• School is incorporated• Following Ministry approved curriculum, where applicable (e.g., obtain and review curriculum used by school)• Policies available, with complaints policy posted in the school
Facility <ul style="list-style-type: none">• Meets health, safety, and construction standards• Fire extinguishers routinely checked• Entrances and exits clearly marked and not blocked• No evidence of mold
Administration <ul style="list-style-type: none">• Hours of instruction consistent with <i>The Education Act, 1995</i>• Maintains student records and provides report cards• Student attendance monitored• Discipline policy is consistent with laws of Canada and Saskatchewan (i.e., no corporal punishment)
Instruction <ul style="list-style-type: none">• Conforms to teaching practices consistent with Goals of Education• Classroom organized• Seven required areas of study taught (e.g., observed during annual inspections)
Personnel <ul style="list-style-type: none">• Teaching staff are certified or hold Letter of Eligibility (for religiously based registered independent schools only)• Teaching staff participate in professional learning opportunities

Source: Adapted from the Ministry of Education records.

We tested six independent schools and found the Ministry completed annual inspections as expected. In instances where superintendents found deficiencies (e.g., school needs to recertify fire extinguishers), it followed up with the independent school until compliant.

Independent schools with a high or medium risk rating receive more frequent (i.e., monthly) inspections in addition to the required annual inspection. For these inspections, superintendents monitor each teacher at the school and document the results in a monthly supervision report provided to the Executive Director. **Figure 9** outlines what superintendents monitor during these monthly inspections (e.g., determine school safe for students, observe teachers instructing students, confirm school tracks students' academic results).

Figure 9—Monthly Inspection Requirements

Environment	Requirement
Physical	<ul style="list-style-type: none"> • Entrances are clear • All rooms checked • Students present • Entrances marked • Evacuation plans in all classrooms • Cumulative folders and criminal record checks securely stored
Academic	<ul style="list-style-type: none"> • Examples of assessment/student work • Report cards (depending on timing of inspection) • Evidence of teacher/educational assistant planning • Curriculum outcomes observed during visit (documents for which subjects observed) • Student/teacher rapport
Administrative	<ul style="list-style-type: none"> • Teacher/student list • Class schedules • Teacher schedules • Monthly fire drills • Discipline log • Teacher (Principal) supervision reports • Health and safety meetings (if applicable) • Staff meeting notes • Complaints policy posted in a visible location

Source: Adapted from Ministry of Education records.

The Ministry performed at least monthly visits at all seven medium or high risk qualified independent schools from September 2024 to January 2025. For schools with a high-risk rating, the Ministry visited these schools multiple times per month (e.g., one school had four different inspections in a given month).

We tested two qualified independent schools with a high-risk rating and found the Ministry completed monthly inspections as required. In addition, we accompanied a superintendent during their monthly inspection of a qualified independent school. We observed the superintendent using Ministry checklists to document their assessment of teacher and student activities and interactions. Additionally, the school showed us how it tracks student performance using the Ministry's IT system.



4.8 Central Tracking of Identified Non-Compliance Needed

The Ministry of Education established processes to take prompt action on identified non-compliance with legislation and Ministry requirements by independent schools. However, the Ministry does not centrally track non-compliance identified during superintendent inspections.

During inspections, if a superintendent finds an independent school to be non-compliant with significant legislation or Ministry requirements (e.g., have not submitted discipline policy), the Ministry will issue a letter of non-compliance to the school. Non-compliance notices outline deficiencies, required corrective actions, and due dates. If the school continues to be non-compliant, the assigned superintendent will escalate the matter to the Executive Director who will then escalate the matter to the responsible Assistant Deputy Minister.

Health and safety issues or issues of a criminal nature are automatically escalated to the Assistant Deputy Minister. When these issues (health, safety, criminal) occur, the Executive Director immediately reports the issue to the Assistant Deputy Minister, who then decides whether to investigate further or escalate the issue outside the Ministry (e.g., Ministry of Social Services, police). The Ministry's *The Registered Independent Schools Policy and Procedure Manual* includes an adequate policy on the steps staff should take if they identify criminal activity.

Management indicated there were four matters escalated to the Assistant Deputy Minister between June 2023 and January 2025.

While the Ministry established processes to issue non-compliance notices to independent schools, we found it does not centrally track these notices. Therefore, the Ministry could not easily determine how many non-compliance notices were issued during our audit period. Management had to check individual files for documentation of non-compliance notices to determine how many instances of non-compliance took place during the period.

We tested all four instances of non-compliance identified by management from June 2023 to January 2025. We found the Ministry took timely, appropriate action to address each instance of non-compliance. These instances ranged from failure to provide the Ministry with the school's discipline policy to the school deemed unsafe for instruction (i.e., required mold remediation that the school would not address). In all four instances, the Ministry appropriately recommended the cancellation of the independent schools' registration certificates. In one instance, the independent school closed on its own before the Ministry issued the cancellation of registration notice.

Without centrally tracking non-compliance notices to schools, the Ministry may be unable to identify trends occurring or be slow in responding to outstanding compliance matters at independent schools. Centrally tracking these notices.

3. We recommend the Ministry of Education centrally track all non-compliance notices issued to independent schools.

4.9 Appropriate Complaints Handling Process Established

The Ministry of Education documented appropriate complaint resolution procedures in its *The Registered Independent Schools Policy and Procedure Manual* and schools made complaints and grievance policies available to parents, caregivers, and students at independent schools.

The Ministry requires all independent schools to have a policy on complaints—Student and Parent Complaints and Grievance Policy—outlining the process to file a complaint. The Policy provides examples of when a complaint should be escalated to an appropriate third party (e.g., police for suspected criminal cases). The Ministry requires this Policy to be posted visibly (e.g., bulletin board at entrance of building) at all independent schools, which superintendents verify during their periodic inspections. The Policy states that if a complainant is not satisfied with the outcome of their complaint, they can escalate the complaint to the appropriate Assistant Deputy Minister within the Ministry.

The Ministry uses a system (i.e., SharePoint) to track complaints it receives. When the Ministry receives a complaint, it gets entered into SharePoint and the Executive Director assigns a superintendent to investigate. Once assigned, superintendents assess the relevance and seriousness of the complaint and will resolve minor non-compliance issues. If any escalation is required, superintendents discuss via phone call with the concerned parties.

The Ministry also established internal deadlines when responding to complaints. For example, staff must review complaints within two business days of receipt and complete investigations within 10 business days.

We tested two complaints received in 2024 (out of seven total complaints) and found the Ministry followed its established policy and addressed each complaint within the required deadlines. For example, the superintendent called a parent who complained about poor student treatment on the same day they received the complaint. The parent decided not to escalate the complaint any further, so the Ministry closed the matter. The Ministry properly escalated the other complaint to the appropriate third party (i.e., police) after determining it required escalation.

Tracking, investigating, and taking appropriate action on complaints in a timely manner helps maintain trust in the independent school system, as it demonstrates the Ministry's commitment to accountability, fairness, and responsiveness to the concerns of students, parents and caregivers, and the public.

4.10 Analysis of and Reporting on Student Achievement Lacking

While we found the Ministry of Education collects certain pertinent information (e.g., reading assessment data for Grades 1–3, credit attainment, graduation rate, student enrollment, student attendance) from independent schools, the Ministry does not analyze or report on independent school student achievement to Ministry senior management or to the public.

There were over 5,400 students attending independent schools at January 2025.



4.10.1 Internal Analysis and Reporting of Student Achievement

Prior to 2023–24, the Ministry prepared data cards for qualified and certified independent schools annually. These data cards provided information on:

- Student attendance (comparing all qualified and certified independent schools to school division reporting)
- Reading data for Grades 1–3 students (number of students reading above, at, or below grade level). Schools use Fountas and Pinnell (a literary assessment tool) to assess student reading level.
- Credit attainment (comparing the provincial average to the school reporting).

The Ministry has since stopped preparing this information, but still requires independent schools to report the information in its IT system. It told us it will require some form of reporting on student achievement when the province's new Student Assessment Program comes into effect but has not yet determined what information it will require.²¹

We observed that the Ministry extracts Grade 1–3 reading assessment data submitted by independent schools from its IT system. However, beyond saving the data centrally, we saw no evidence of the Ministry analyzing the available data. Additionally, we did not see any evidence of the Ministry obtaining credit attainment or graduation rate data related to independent school students.

We were unable to see any consistent periodic reporting to senior management that outlined the success (or lack thereof) of independent schools. For example, we expected the Ministry to provide periodic reports to senior management including key data on independent school operations such as the number of students enrolled, key academic achievement results (e.g., reading level assessment scores, credit attainment, graduation rates) of those students at independent schools. During our audit, we observed the Ministry reviewing reading level assessment score data from independent schools during its site inspections but noted that the Ministry does not currently analyze, compile, or report on this data.

The Ministry should analyze student achievement (e.g., by category of independent school). If the Ministry determined a specific category of independent school as underachieving, it would need to consider the impact on assigning risk ratings for schools in that category and conduct inspections more frequently (see **Section 4.5**).

Insufficient reporting on independent school operations may not keep senior management aware of ongoing issues, impacting their ability to make informed decisions, allocate resources effectively, and ensure the Ministry takes appropriate action to address concerns at independent schools.

4. We recommend the Ministry of Education periodically analyze and report to senior management on independent school student achievement.

²¹ In November 2024, the Ministry of Education announced a provincial assessment program that will provide a fair and objective measure for how students are doing, help guide instruction and assist schools, school divisions, and government in improving student achievement. Beginning in the 2025–26 school year, Grades 5 and 9 students will participate in an annual mathematics assessment, and Grades 4, 7, and 10 students will participate in an English language arts assessment. saskatchewan.ca/residents/education-and-learning/prek-12-education-early-learning-and-schools/student-assessment/saskatchewan-student-assessment-program (31 March 2025).

4.10.2 Public Reporting

The Ministry of Education makes guidance documents (e.g., *The Registered Independent Schools Policy and Procedure Manual*) available on its website but does not report other information about independent schools publicly (e.g., enrollment, funding, student achievement).

During our interjurisdictional analysis (See **Section 4.2.2**), we found other jurisdictions do not currently report this type of information about independent schools publicly. However, once the Ministry analyzes and internally reports on student achievement at independent schools, it should consider what information to report publicly. For example, student achievement data could inform parents or caregivers considering student enrollment at certain independent schools about the academic achievement of these schools compared to their counterparts in K–12 school divisions.

5.0 SASKATCHEWAN INDEPENDENT SCHOOLS AT JANUARY 2025

Registered Independent Schools ^A	
Northwood Christian School	Swanson Christian School
East Fairwell School	Pasquia Hills Christian School
Endeavour Christian School	Wheatland Christian School
Countryside School	North Star School
Valley Country School	Chaplin Mennonite Christian School
Fort Pitt Christian School	Old Colony Mennonite Christian School
North Prairie Mennonite School	Northern Skies Christian School
Qualified Independent Schools	
Prairie Christian Academy	Discovery Learning – Regina Campus
Morning Star Christian Academy	Northeast Christian Academy
Valour Academy	Elevation Academy of Prince Albert
Brilliant Star Montessori School	Riverside Christian School
Montessori School of Regina	Prairie Sky School
Roadways Literacy Academy	Discovery Learning – Maple Creek Campus
Flex ED School	Curtis-Horne Christian School
Discovery Learning – Oxbow Campus	Allegro Montessori School
Westgate Heights Academy	
Certified Independent Schools	
Saskatoon Christian School	Valley Christian Academy
Saskatoon Misbah School	
Historical High Schools	
Luther College High School	Lutheran Collegiate Bible Institute
Rosthern Junior College	Athol Murray College



Alternative Schools	
Ellen Gunn Education Centre	Eagle's Nest Youth Ranch – Christopher Lake
Eagle's Nest Youth Ranch – North Battleford	Hansen Education Centre
Cornwall Alternative School	Eagle's Nest Youth Ranch – Saskatoon
Eagle's Nest Youth Ranch – Prince Albert	Schaller Education Centre
Associate Schools	
Briercrest Christian Academy	Meadow Lake Christian Academy
Cornerstone Christian School	Mother Teresa Middle School
Harvest City Christian Academy	Regina Christian School
Heritage Christian School	Regina Huda School

Source: Adapted from the Ministry of Education records.

^A At January 2025, all Registered Independent Schools were religiously based.

6.0 SELECTED REFERENCES

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