

**ALTERNATIVE
EDUCATION
ASSESSMENT &
REGISTRATION**

Section 14 Education (Welfare) Act, 2000

**Assessment of Education
in places other than Recognised Schools**

**Independent School
Review Assessment Report**

Name of School

Comeragh Wilderness Academy

Address

Boolacloghagh ,
Rathgormack,
Carrick on Suir,
Co. Waterford

Telephone

051-646854

Name of Principal/Director

Quentin Weaver

Name of Assessor/s

Jane Merriman

Date of Assessment

14 December 2023

Date of Final Report

28th February 2025

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Section 1 Background Information

1.1. School Hours

Opening Time:	09:00		
Closing time:	17:00		
Main breaks during the day:	09:00	to	10:00
	13:00	to	15:00

Is school in operation for more than five years?

No

If no, please give date on which school commenced operation

June 2022

1.2. Name(s) of principal and/or other teacher(s) interviewed

(Normally interview should take place with the principal)

Quentin Weaver (Principal), the Deputy Principal and the Operations Manager

1.3. Sources of evidence on which report is based

This assessment report is based on the following sources of evidence:

- Information furnished in the R2 Information Forms completed by the principal
- Interviews with the principal, the deputy principal, the operations manager, the education officer and other relevant members of the school's staff
- Interview with students
- Viewing of the learning environment
- Observation of samples of learning tasks completed by the students
- Observation of the educational materials in use
- Review of school's website
- Review of the books by Campbell Loughmiller *Kids in Trouble - An Adventure in Education and Wilderness Road*
- Relevant School documentation as referenced in the report and including:
 - Comeragh Wilderness Academy Proposed 5 year plan
 - The School Calendar
 - Child Safeguarding Statement, including the risk assessment and associated procedures
 - Health and Safety Statement

Section 2 General Information and School Context

The Comeragh Wilderness Academy (CWA) has its origins in the State as Comeragh Wilderness Camp (CWC), which was operational from 2008. From 2012 the camps provided intervention and an element of respite for young people that were experiencing a range of personal, social, and educational difficulties, that subsequently impacted their engagement in school. The camps used the *Wilderness Road Therapeutic Camping* (WRTC) model. The WRTC approach, which underpins the current provision, is based on the philosophy of Campbell Loughmiller, an American educator. Loughmiller's philosophy is outlined in his 1965 publication *Wilderness Road*, which describes the use of a long-term camping experience to address the needs of boys displaying emotional and educational difficulties. The model as described in the book and applied in CWA incorporates the use of evaluations and goal setting that specifically include the young person, their parents, and the camp staff.

The CWA is part of the Dunmore East Christian Fellowship, a community of Amish Mennonites. The programme's cultural roots lie in the Amish Mennonite community, which is described as one that places a high value on the teaching of children. In line with this, the CWA approach is one where the whole community participate and contribute to nurturing and providing comprehensive education to the cohort of students. The model of education is one where the needs of the individual student are at the programme's core. Each young person is nurtured without compromising the overall needs of the group.

In June 2022 Comeragh Wilderness Academy began offering full time programmes to adolescent boys. The CWA operates as a boarding school. At the time of the assessment there were three adolescent boys enrolled. The programme currently has capacity for up to 10 students with an intention to expand towards a programme for girls. The principal and staff are mindful that this expansion should be realised in an incremental and organic manner. This is to ensure that programme delivery is not compromised while the management, staff team, and the extended community continue to learn and develop the programme.

The school is in operation for 313 days each year and operates on a cycle of four weeks living onsite in the camp followed by a return to the family home for week five. The home visits are structured and require a coordinated approach with the parents. To ensure the educational model is successfully implemented, effective and regular communication between the academy and parents is an essential part of the programme.

While the programme maintains the fundamentals of the *Wilderness Road Therapeutic Camping* (WRTC) model, the management team of CWA are cognisant of modifying it to ensure that it is applicable within the Irish context. Therefore, while much learning was achieved from the running of the wilderness camps, the programme team remain committed to evolving and improving programme delivery within the Irish educational, social, and cultural context.

With these considerations at its core, the CWA has developed Mission and Vision Statements with identified pathways to achieving objectives. This includes actions that are outlined in a 5-year plan, currently in year 2. While these actions primarily identify material improvements, discussions with the principal, vice principal, and other relevant staff, demonstrated that there is a keen focus on improvements in all aspects of the programme. In particular, a desire to implement an effective educational provision while keeping the primary focus on the wellbeing and personal development of

each student was evident. All planning and associated actions are considered with a view to best outcomes for young people engaged on the programme.

The Comeragh Wilderness Vision is

- *To create an environment where the child is at the core, where education and personal growth go hand in hand.*
- *To foster an environment that nurtures dignity and respect for both the child and their family.*
- *To provide a safe and healthy space for growth, regardless of one's background.*

The Comeragh Wilderness Mission is

Our approach is holistic in nature, focusing on emotional well-being, life skills, and education within a backdrop of pure peace and tranquillity. To stay true to our mission, we abide by a few simple rules:

- *What we do, we do as a group while maintaining a positive attitude.*
- *What is worth doing is worth doing right.*

Comeragh Wilderness Camp CLG (trading as Comeragh Wilderness Academy) is a registered charity under a Board of Directors. Funding has come from donors, primarily from the United States. Parents of students make a financial contribution with fees agreed according to their means. The school operates a bursary system for students.

The Comeragh Wilderness Academy programme runs for up to two years of a student's educational cycle. The model is interventional and on completion of the programme the young person can return to a mainstream school setting or progress through another model of education within the state.

Section 3 The Principal and Staff

The staff at Comeragh Wilderness Academy maintain the Christian faith and anabaptist traditions (anabaptists hold that baptism must be upon a confession of one's faith as an adult). Since the time of the Preliminary Assessment, a number of changes have been made to the CWA staff team and governance structures. The staff team bring with them an array of expertise, knowledge, and complimentary skill sets which are used in a targeted manner. It was evident at the time of the assessment that staff are consistently engaged and eager to build on and develop their skills with a focus on programme delivery and best outcomes for the adolescents they engage with.

The principal has overall responsibility for the day-to-day running of the programme with significant support from his deputy and the wider staff team. The principal reports to the board of directors and executive committee. The school's operations manager is responsible for finance. His role includes building relationships with the local community and linking the United States (US) model with the local culture and Irish educational model.

The principal, deputy principal, education officer, and operations manager are employees of the school. The school's operations manager is responsible for building relationships with the families and the local community in linking the US model within the context of the Irish culture and education systems. The chiefs are young volunteers from the US with previous experience of wilderness camps. Chiefs must be at least 21 years old. They join the CWA community for two to three years. They are supervised by the principal and the deputy principal, and their work is monitored by the school's

education officer. The chiefs are key members of the staff team, they are present onsite day and night. Significant is their inclusion within the core peer group while living with the young people in the forest camp. The chiefs work directly with the young people on personal and educational goals. The CWA goal to *re-introduce the young person to what a [positive] relationship is*, is prioritised through the role of the chiefs. The partnering of chiefs and young people aims to instill a belief that the student can experience success and satisfaction in relationships by developing the skill set required to achieve relationship goals.

Section 4 Time Devoted to Education

The programme operates around a five-week rotation, which includes home visits for a week at the end of each cycle. The curriculum is planned organically across the duration of the programme, which lasts for up to 2 years with students usually staying for approximately 18 months. Students are directly involved in planning activities through setting short, medium, and long-term goals. Planned activities include canoe trips, structural improvements to the campsite, research projects initiated by student interests, and meal planning.

The students have a structured routine within set times for key aspects of daily living, for educational activities and for goal setting, reflection and evaluation. A particular emphasis is placed on the transitioning between different activities. Support, space, and strategies for self-care are facilitated by staff during times of transition. The daily structure includes breakfast at 08:45, lunch from 13:00 – 14:00, dinner at 18:00, and bedtime is at 21:00.

Section 5 The Learning Environment

Comeragh Wilderness Academy is set under the Comeragh Mountains on 46 acres of land and there is potential to add to this acreage in the future. A significant amount of the land is forested, and Comeragh Wilderness has carried out an extensive tree planting programme to increase this. An impressive and exceptionally well-maintained campsite has been constructed in a mature forested area. The camp consists of timber and canvas/vinyl tarp tented structures. Students participate in all stages of campsite construction including tent design, construction, and trail maintenance. The camp is entered through a recently reconstructed porch. The camp includes students and chiefs living accommodation, a woodshed, a kitchen, toilets, a wash area, and a campsite tool shed. There is a small open-sided tent with seating and a central fire area, this is a key gathering place used for transition, evaluation, reflection and daily resolution prior to bedtime.

The students' sleeping tent is located near to the recreation hut and adjacent to the chiefs' sleeping tent. The tent is heated by a self-contained external log stove central heating system. Each student has a locker beside their bed. The locker has a dual function, for personal storage and as a location to visibly record key individual personal development and practical goals. The kitchen is used to cook meals of the day twice weekly when students are camping out.

In addition, and external to the campsite, a number of buildings are on the land. Students make daily use of the modern shower blocks. There is a tool shed and impressively stocked outdoor equipment store. The dining hall is a timber construction; it is a warm and inviting communal area. Here meals are

cooked and served each day, other than on days when students cook at the camp. The dining hall houses a small library, and a number of educational resources are available to aid teaching and learning, some of which takes place in this area. The dining hall is also used for parents' visits and for students to display work.

An impressive and large teepee style structure with circular seating and a central fire area is located close to the dining hall. This area is multifunctional and can facilitate a small or large number of CWA community members.

A building located at the entrance gate of the CWA site is used to house the office, a central staff room, toilets, and includes storage space for record keeping.

Section 6 The Educational Activities

6.1. General information

The curriculum of Comeragh Wilderness Academy draws from multiple recognised models of education and approaches to deliver a child-focused alternative programme within a unique context. The programme while based on the needs of each individual student, simultaneously prioritizes that the needs of the group are not compromised.

Short- and long-term learning goals are set by the student, and each young person is facilitated to evaluate their own needs and ability to achieve their goals. Identified goals are reviewed and updated regularly and this requires agility in curriculum delivery to take into account each child's therapeutic, educational, social, emotional, and personal needs.

CWA is committed to incorporating aspects of the state curriculum into the academic component of the programme. The R2 Annual Return submitted for the academic year 2023-24, specifically identified this as targeted for senior pupils who are given the opportunity to sit the state exams at an independent education centre in Waterford. The programme identifies links to *Aistear*, *Montessori*, and *Steiner* models of education. Aspects of these models were evident at the time of the assessment. While it was not identified by the provider, an unschooling approach was also evident with elements consistent with a Sudbury/Democratic Education model. The CWA framework follows four interconnected themes of Aistear for children's learning and development. These are, *Well-being*, *Identity and Belonging*, *Communicating*, *Exploring and Thinking*. Similar to a Steiner approach, subjects are taught in thematic units allowing the child as part of a group to immerse themselves in a specific selected area of learning. All elements of the CWA educational curriculum are delivered while adhering to the two fundamental principles of the programme as set out in their mission statement, i.e., *what we do we do with a good attitude, and what we do we do as a group*.

The school identifies the following subjects as available to students:

- English
- Maths
- Science
- Geography
- History

PE
Music
Social Studies
Home Economics
Art
Religion
Woodwork-bushcraft

The principal stated that if necessary young people who require assistance in English and Maths can access targeted tutoring. Under the supervision of the CWA education officer, a programme aim is to prepare a young person to return to a conventional educational setting. CWA staff offer support to the young person and his family to make a successful transition to school or a similar mainstream educational environment.

During the assessment students met with the assessors in their camp. They showed their quarters, described their daily routine, and answered questions relating to activities and to their overall experience of the programme. The young people articulated the positive impact of the programme and described some of the challenges they encountered. The students also discussed plans for upcoming events and current educational projects.

The assessor viewed individual handwritten plans and records of goals that were posted on the wall of the dining cabin. Samples of completed written work were viewed.

6.2. Language and literacy skills

In all aspects of the CWA teaching and learning, there is an emphasis placed on the written word. All written work is on paper, there is no ICT equipment available for the students. Written work takes place as part of planning, goal setting, individual evaluation, journal entries, camp design work, letter writing and extends to poetry, articles, and recording information and learning in project work. Written work is compiled into a portfolio. Portfolios are stored by staff centrally and samples of written work can be reviewed by parents. Students take their portfolios home on completion of the programme.

Reading is integrated into the programme wherever possible and each day students are actively encouraged to read literature and texts from a range of educational materials and books provided to them. Where specific information is sought, dictionary and encyclopaedia work are facilitated and encouraged.

There is an emphasis on oral expression and development.

Resources currently available in the area of language and literacy can be described as generic. There is an intention to develop the area of language and literacy to incorporate and maximise more academic elements that are compatible with effective programme delivery.

6.3. Numeracy

The approach to numeracy at the time of the assessment was described as goal focused. This starts by gathering information about academic achievement and ability from previous school reports and discussions with students and parents. The CWA intends to adopt standardised testing in numeracy using an American model *Woodcock and Johnston*. The testing is intended to ascertain ability with a view to recording progress. At the time of the assessment the Education Officer was due to travel to the US to carry out continuous professional development (CPD) in administering *Woodcock and Johnston* standardised tests.

While the provision makes use of methodologies such as flash cards, worksheets, and sample exercises, a significant amount of numeracy is delivered through functional mathematics. Opportunity for teaching and learning in numeracy was outlined by the principal and deputy principal during the assessment. Construction is a key element of the programme for students and is used to deliver curriculum elements in the areas of scale, measurement, geometry and other elements of engineering. Opportunities for budgeting are availed of through weekly meal planning and students avail of instruction in basic accountancy through weekly involvement with the affiliated academy store in the local village, *The Market*. The principal stated that *students avail of instruction in basic accounting and record keeping through a weekly visit to the camp 'Market' where they receive an allowance to spend as on postage, hygiene products, crafts supplies, or other items of interest.*

The CWA has committed to providing additional tutoring to students in numeracy, where it is deemed necessary. The intention to strengthen the academic aspect of numeracy within the programme was identified as ongoing at the time of the assessment.

6.4. Irish

Irish is not part of the curriculum at the Comeragh Wilderness Academy. Under Section 14 of the Education (Welfare) Act, 2000 the study of Irish as part of the provision is not mandatory. However, opportunities provided to develop skills in Irish should be considered for all students. This is of particular significance where the CWA identifies a return to mainstream school as a progression route for students.

Where an exemption was not previously granted, section 14 registration does not entitle students to an exemption from the study of Irish in the event of a subsequent enrolment at a Department of Education recognised school.

Children attending an Independent School should be afforded opportunity for the study of Irish, however the study of Irish is not a requirement for registration under Section 14 of the Education (Welfare) Act, 2000. Where Irish is included in the provision, an Independent School may identify students attending that they consider would qualify for an exemption from the study of Irish. Independent Schools can make decisions in consultation with parents regarding arrangements for these children. Any arrangements made in relation to the study of Irish does not entitle students to an exemption from the study of Irish in the event of a subsequent enrolment at a Department of Education recognised school.

Parents of children attending an Independent School should be informed of and acquaint themselves with implications of not taking Irish and/or having a second language. Parents seeking information should consult with the Department of Education www.education.ie and/or the State Examinations Commission www.examinations.ie with regard to the requirement for Irish and/or an additional language.

6.5. Other areas of learning

According to the school's website, and information provided to the Alternative Education Assessment and Registration Service on the school's annual returns, in addition to the areas of literacy and numeracy the following areas of learning are included in the curriculum; *Science, Geography, History, Physical Education, Music, Social Studies, Home Economics, Art, Religion, Woodwork-bushcraft.*

Aspects of all identified subjects were evident at the time of the assessment. The model and approach of the provision is one that is led by the needs of the children attending. All components of the curriculum subjects are child centred and *allow the child to explore hands on education and work in collaboration with others in their education setting with the assistance of able adults.* This means that there is no predefined planned curriculum in any of the subjects offered. Planning and programme delivery are informed by the short- and long-term goals set by students. Goals are identified at the start of the placement and reviewed and updated regularly.

As Comeragh's learning environment is primarily outdoors, curriculum delivery and teaching and learning is heavily focused on outdoor skills and physical activities. All aspects of the programme including maintenance of the campsite, skills for day-to-day living in the camp, outdoor activities such as mountain hiking, kayaking, archery and fishing, are utilised to explore and deliver subject matter.

This approach was effectively demonstrated in a student driven project on the birch polypore mushroom, which was being undertaken at the time of the assessment. The education officer facilitated the project, and he discussed the teaching and learning experience with the assessors. Evidence of learning was displayed in the dining area and recorded in students' portfolios. This project incorporated learning in multiple areas including history, geography, and science.

Music is primarily delivered through learning songs and singing and this is an important element for CWA and associated communities.

Relationships are identified as a key element of the programme with the re-introduction of positive relationships, including in the context of educational engagement. *How to respect one another, listen to one another and work together to solve problems that may arise within a group whilst providing peer support* is identified at CWA as a primary goal.

6.6. Special educational needs

The school sets out its commitment for inclusion of children with additional and/or special educational needs in an Inclusion of Children with Additional Needs Policy which was provided at the time of the assessment.

In principle the CWA provides opportunity for all eligible children to attend regardless of their ability or needs, within the expertise and resources available and in the best interest of the individual child. This is part of the CWA Admission Policy which is available on the website and was *developed in accordance with the requirements of the Education Act 1998, the Education (Admission to Schools) Act 2018 and the Equal Status Act 2000.* Children with additional needs and SEN are identified where possible at the time of enrollment. The programme works towards providing appropriate support,

resources and the physical environment required to meet the child's needs. The approach of tailoring the programme to the needs of each individual student supports the CWA in delivering a provision for students with additional and/or special educational needs.

The Inclusion of Children with Additional Needs policy states that the team *will work in consultation with the teachers, the parents/guardians of the child, and other professionals and/or agencies working with the family to determine additional resources required to meet the functional and developmental needs of the child and to determine the suitability of the school in meeting these needs.*

It is stated that staff will be supported to gain the appropriate knowledge and skills for the implementation of this policy.

Section 7 Assessment and Record Keeping

The model of education at CWA is focused on the setting and monitoring of individual goals, identified as both personal and learning goals. This requires records of goals and learning to be kept by students and staff, and an ongoing monitoring of student progress is implemented by means of evaluation, feedback, and issuing of written reports.

Staff continually evaluate student activities and progress and under the guidance of the principal and deputy principal their evaluations are shared with the students and their parents to identify learner needs and plan future activities.

Standardised testing (the Woodcock and Johnston model) is used initially and periodically as required, along with monitoring of individual goal setting and learning plans. The principal identified *Education Elephant Ireland*, who provide assessment tools and associated training, as a resource the CWA intends to access. It is expected that this platform will further enhance the staff's ability to implement assessments relevant to its specific cohort of students.

Parents are communicated with regularly regarding their child's progress through weekly oral reports (principal phone calls) and in the form of written reports periodically.

Section 8 Other Relevant Information

All staff members have been Garda vetted and have been trained in child safeguarding under the Children's First Act 2015. All staff have completed first aid training.

The school has a compliant Child Safeguarding Statement (CSS) which is displayed and was viewed at the assessment. There is an appointed Designated Liaison Person (DLP) and Deputy Designated Liaison Person (DDL). Staff are trained in the implementation of the Child Safeguarding Statement. Evidence of the procedures identified in the Child Safeguarding Statement as required was reviewed and are in place.

Documentation relating to Child Welfare and Protection is organised, easily accessible to staff, understood in terms of purpose and implementation and stored in a secure manner. Child welfare and

associated procedures were identified as to the forefront of the provision as part of a child centred programme.

Section 9 Evaluation of the Education Provision and Recommendations

In my opinion students attending Comeragh Wilderness Academy are in receipt of an education, intellectual, physical, moral, and social that meets requirements for Section 14 Registration for students attending the school.

The reasons for this are as follows;

- Effective structures and governance evidenced to support the running of Comeragh Wilderness Academy.
- The commitment of the principal and deputy principal in leading a coordinated team within a supportive community.
- The dedication and passion of the staff team while delivering an alternative education provision that is child centred and focused on best outcomes for each individual young person.
- The balance between meeting the individual young person's needs while not compromising best interests and outcomes of the overall student and staff team.
- The staff's experience, expertise, knowledge, and skills are utilised to achieve programme goals.
- Effective channels of communication are in place between CWA and the parents of students, to support improved outcomes.
- Mechanisms for evaluation and feedback between staff and students provide opportunities for learning and progression.
- The utilisation of the natural setting provides a learning environment that is safe, stimulating and inspiring for the programme participants.
- The trust bestowed upon students to take ownership of their own education and personal progression under the guidance and support of staff and parents, resulting in opportunity for meaningful personal growth.
- The school's focus on developing a comprehensive programme that is motivated towards improved educational and personal progress for a cohort of students that require a targeted approach to meet individual goals.
- Evidence that the wellbeing of the child and opportunity to achieve best outcomes is at the forefront of all aspects of programme delivery.
- High motivation towards programme improvement was demonstrated by the staff team under the guidance of the principal and deputy principal.

Following my assessment of the provision I recommend;

- to enhance knowledge that CWA carry out further investigation of alternative models of education that cater for and address the educational needs of early school leavers (ESLs), (including Steiner and Sudbury and alternative programmes for ESLs) to include considering linking with principals/directors of such programmes already established within the state.

- as the CWA draws on multiple compatible models of education, that it considers creating an overarching programme plan/educational model, to provide increased coherency and coordination specific to the identified programme goals and student cohort.
- that programme plans for individual subjects are developed to identify specific learning outcomes to be achieved, with particular focus in the areas of numeracy and literacy. Plans can be developed without compromising the child-centred approach and educational model employed. This should include more formalised short-term planning, so that specific opportunities for learning in day-to-day activities are identified and recorded. Students can engage in and contribute to such day-to-day planning and associated recording of learning. QQI module descriptors (Levels 3 and 4) may be useful to review for examples of learning outcomes within specific subject areas outside of a specified curriculum.
- that resources specific to tasks and activities are developed to support and record learning. As the teaching and learning is student led, this will require agility and flexibility to create and modify resources without the need to compromise the educational model and approach.
- that CWA develop an individual progression plan for each student to ensure that the transition back to mainstream education is supported in a cohesive and effective manner.
- to consider accessing a professional on a consultative basis to assist with the coordination of the educational aspect of the programme. This may help to achieve a more cohesive approach to teaching and learning and to encourage the rebuilding of each student's relationship with education.
- expand the current strategic plan by detailing actions, timelines and resources. This would allow CWA to better capture the multiple social and educational improvements identified as part of the discussion with assessors.

I recommend that pupils of the Comeragh Wilderness Academy are retained and registered on the section 14 Register. I recommend that a review assessment is carried out in July 2025 to monitor the ongoing development of the provision.

The findings of the assessment were discussed with the participants on the date of the assessment. The participants were advised that the decision regarding registration would be made by Tusla – the Child and Family Agency: Alternative Education Assessment and Registration Service (AEARS).

Following the assessment, a draft report is provided to the principal, along with a Factual Accuracy and Feedback Form, which may be submitted within a specified timeframe, in response to the content of the draft report. The report, along with any information provided on the feedback form for consideration, is brought to the AEARS Registration Panel. The Registration Panel make decisions regarding registration of children in receipt of the education at the Independent School.

Section 10 Discussion of Finding of Report with Principal

The findings as outlined in the sections of this report were discussed with the principal at the conclusion of the visit. It was stated that the recommendation would be to include the pupils of Comeragh Wilderness Academy on the register. The final decision regarding registration will be made by the Alternative Education Assessment and Registration Service Tusla, Child and Family Agency.

Section 11 Outcome

Outcome of Tusla Alternative Education Assessment and Registration Service Panel Regarding Requirements for Section 14 Registration of Children Attending the School

Following the Assessment, the Registration Panel decided that children attending Comeragh Wilderness Academy will be registered and retained on the register of children receiving an education in a place other than a recognised school as required by Section 14 of the Education (Welfare) Act, 2000.

Registration is subject to a periodic review by the Child and Family Agency