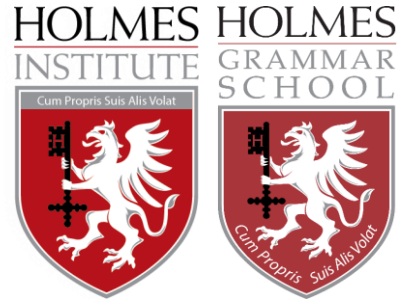


Management of Under 18 International Students Policy and Procedures



1. Scope

This policy and procedures apply to international students under the age of 18, enrolled or seeking to enrol in a course of study at Holmes Institute Pty Ltd and Holmes Commercial Colleges (Melbourne) Pty Ltd, together herein called Holmes.

2. Purpose

The policy and procedures aim to:

- 2.1 Ensure the personal and social wellbeing of international students under the age of 18 (“U18 students”).
- 2.2 Outline how Holmes takes responsibility for the accommodation, support and general welfare of U18 students covered under Holmes’ Confirmation of Appropriate Accommodation and Welfare (CAAW) letter.

3. Policy Statements

- 3.1 Holmes is committed to appropriately managing international students under the age of 18 in accordance with the Education Services for Overseas Students (ESOS) Act 2000, Education Services for Overseas Students (ESOS) Regulations 2001, the National Code and relevant State and Territory Child Safety legislation.
- 3.2 Holmes does not admit students under the age of 13 and thus will not permit any student under 13 to be provided with homestay accommodation.
- 3.3 Holmes will provide U18 students under its CAAW:
 - a) Appropriate accommodation, support and general welfare arrangements until another provider accepts responsibility for the student or the student leaves the country or turns 18;
 - b) An age and culturally appropriate orientation program;
 - c) Access to services to assist U18 students in meeting course requirements; and
 - d) Access to welfare-related support services as required.
- 3.4 Holmes will also implement its Critical Incident Policy and/or Mandatory reporting protocols where necessary to ensure the safety of an U18 student.
- 3.5 Holmes will regularly provide training to student services and support staff in the following areas:
 - a) ESOS Act, National code, and any state or territory guidelines e.g. VRQA guidelines
 - b) Child Safe Standards
 - c) Holmes’ policies for supporting younger students including in emergency situations such as where critical incidents occur, and

- d) Holmes procedures and guidelines for verifying the appropriateness of a student's accommodation based on the student's age and needs. E.g. ensuring that all residents over 18 at a Homestay placement have evidence of a Working with Children Check (WWCC) and that there is a suitable, private bedroom for the student's stay.
- 3.6 Such training will be provided during staff induction and at least three times per year through staff meetings, specific training programmes and attendance at sector specific conferences.
- 3.7 Holmes requires all employees, including contractors to have a current and valid WWCC or the state equivalent, irrespective of whether they have access to U18 students. This includes ensuring that all residents over 18 within a Homestay placement have a WWCC.
- 3.8 All approved Homestay families will be subject to ongoing monitoring and review by Holmes.

4. Procedures

Welfare and Accommodation Arrangements

- 4.1 In accordance with legislative requirements, all students under the age of 18 must be cared for by:
 - a) A parent or legal guardian; or
 - b) A responsible, suitable adult relative over 21 years of age nominated by the parents (Relative as defined by the Australian Government. Refer to Department of Home Affairs website for further information); or
 - c) A Homestay placement nominated by Holmes.
- 4.2 Parents/legal custodians must nominate one of the three options above and advise Holmes via its Care Provider Selection Form before Holmes can issue a Confirmation of Enrolment (CoE).
- 4.3 Holmes will not permit any student under the age of 13 to be provided with homestay accommodation.

Note: The Department of Home Affairs (DHA) will not issue international students under the age of 18 a visa unless there is proof of appropriate arrangements for the student's accommodation, support and general welfare during their stay in Australia until they turn 18.
- 4.4 All international students who are not being cared for by a parent, legal guardian or, a nominated suitable relative, must agree to live in Holmes approved accommodation, and to be under Holmes welfare arrangements for either the duration of their stay in Australia or until the student turns 18, whichever happens first.
 - a) In such instances, Holmes is required to confirm to DHA that appropriate arrangements are in place by completing a declaration called the Confirmation of Appropriate Accommodation and Welfare (CAAW), using the Department's pro forma letter available through PRISMS.
 - b) Holmes approves the welfare of students who are enrolled in courses offered by Holmes, for 7 days prior to the commencement date in the

Confirmation of Enrolment (CoE) to 7 days after the completion date outlined in the student's CoE.

- 4.5 The CAAW is submitted together with the student's CoE as part of the Student Visa application and is subject to approval by the DHA.
- 4.6 If the student is being accompanied by their parent or guardian or if the student will live with a suitable adult relative, this requires the DHA's approval. As such an application for approval of care requirements must be made direct to DHA. In this instance, Holmes will issue the student with a CoE but not a CAAW – as the student will not be under Holmes care. Holmes may however request to review the following information about the proposed welfare arrangements before issuing a CoE, the:
- a) Identity of the family member who will be taking care of the student and demonstrable information about the relationship to the student;
 - b) Age of the proposed carer;
 - c) Student's parent/guardian's written approval for the nominated family member to provide accommodation and welfare arrangements;
 - d) Student's parent or legal guardian's proof of residency in Australia for the duration of the welfare period;
 - e) Proposed address at which the student will live and information about the suitability of the accommodation; or
 - f) Any other information that reassures Holmes that it is appropriate to issue a CoE, such as evidence of good character (e.g. a National Police Certificate).
- 4.7 Holmes may insist that care arrangements be provided by Holmes if Holmes is dissatisfied that the nominated carer meets the welfare requirements set by the DHA. This includes where full checks and documentation are not provided to Holmes at the time a COE is requested.

Recruiting, Screening, Selection and Monitoring of Homestay Accommodation

- 4.8 Where a student and their parent(s) elect to be under Holmes' CAAW, Holmes will ensure the student is placed in suitable accommodation, with due consideration to the student's age, needs and preferences in relation to pets, dietary considerations, facilities, etc..
- 4.9 Holmes may contract Third Party Providers to assist in the identification of appropriate Homestay Host families. The role of the Third Party is limited to the identification and shortlisting of homestay families and to providing ongoing support to homestay providers, such as:
- a) General advice on homestay requirements; or
 - b) General information on helping international students adjust to life in Australia.
- 4.10 Where Third Party Providers provide Holmes recommendations as to Homestay Host families, the Third Party Providers will ensure the following for each placement:
- a) Evidence of an interview with the proposed Host family that demonstrates their family arrangements, including whether proposed accommodation is appropriate to Holmes' students' age and needs;

- b) Checking the Host(s) personal identification;
 - c) Evidence of a valid WWCC for all residents over 18 including randomly reviewing WWCC validity online, on a regular basis;
 - d) Undertaking referee checks to confirm Host suitability for child connected work; and
 - e) Ensuring the student gets a separate suitable bedroom.
- 4.11 Holmes retains responsibility for approving, verifying and monitoring the accommodation of students on its CAAW. To this end, Holmes will not delegate a site visit to determine suitability of student accommodation to Third Party Providers.
- 4.12 Where a student is to stay at a Holmes' selected Homestay placement, Holmes U18 Welfare Coordinator will undertake an initial visit to the proposed Homestay placement prior to the student's arrival, followed by periodic follow-up inspections of the student's living arrangements which will be undertaken at least every six (6) months. If at this point, the homestay has been visited by Holmes in the previous three (3) months in relation to another placement, each student at that placement will be inspected and no new inspection to the same will be required until the six (6) month cycle obliges another inspection.
- 4.13 Holmes will also ensure that the Homestay placement host has emergency contact details for Holmes and contact details of the student's parent/guardian as well as guidelines for appropriately hosting an U18 student.
- 4.14 There should be no gap in care arrangements between courses. So if the U18 student wishes to change accommodation arrangements while under Holmes' CAAW, the student will be required to gain Holmes' approval prior to any change occurring. Parental/ Legal guardian consent for the change will also be required.
- 4.15 If Holmes suspends or cancels the enrolment of the U18 student for whatever reason, Holmes will continue to check and approve the welfare arrangements for that student until any of the following applies:
- a) the student has verified, alternative welfare arrangements approved by another registered provider;
 - b) care of the student by a parent or nominated relative is approved by Immigration;
 - c) the student leaves Australia; or
 - d) Holmes notifies the Australian government via PRISMS that it is no longer able to approve the student's welfare arrangements.
- 4.16 If the student indicates they will not maintain arrangements that Holmes is prepared to approve, Holmes will report that it can no longer approve the arrangements for the student once all other attempts to assist the student to maintain appropriate arrangements have been exhausted.
- 4.17 In cases where a student under 18 years of age transfers to Holmes with welfare arrangements approved by another registered provider, Holmes will:
- a) Negotiate the transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap

- b) Inform the student of their visa obligation to maintain their current welfare arrangements until the transfer date, or have alternate welfare arrangements approved or return to their home country until the new approved welfare arrangements take effect

Student's Arrival, Orientation and Support

- 4.18 Travel arrangements between the U18s home country and the authorised accommodation in Australia are the responsibility of the parent/ legal custodian, although Holmes may arrange airport reception if requested (additional fees apply).
- 4.19 All U18 students will have received information from Holmes regarding 24/7 emergency number to contact if they have any concerns about their accommodation or any other matters prior to the day they start studying. The emergency contact will be the relevant Campus Director or a delegate who will be familiar with procedures in dealing with:
 - a) Missed Airport pickup or for lost students;
 - b) Problems at Homestay;
 - c) Criminal acts requiring police intervention (Mandatory reporting);
 - d) Providing assistance and reporting any incident or allegation involving actual or alleged sexual, physical or other abuse; and
 - e) Queries from agents and parents.
- 4.20 At Orientation all under 18 students will be provided with a Student Safety Card. The Student Safety Card will include:
 - a) The homestay accommodation provider's address, home and mobile telephone numbers (if the student is in homestay) OR the student's home address and family contact details;
 - b) Holmes Institute's contact details, including 24/7 emergency contact detail; and
 - c) In the case of Holmes Secondary College students, the card will also specific that "Holmes Secondary College is regulated by the Victorian Registration and Qualifications authority (VRQA). Students can contact VRQA at www.vrqa.vic.gov.au.
- 4.21 At orientation, U18 students will be counselled as to the monitoring procedures in place for them including their rights and responsibilities when staying with Homestay families. Students will also be encouraged to give Holmes regular feedback on their experience.
- 4.22 While studying at Holmes, students under 18 will be closely monitored by the Campus Director, Program Manager and the Manager of Student Engagement to ensure that the young person's needs, both academic and personal, are being met.
- 4.23 Holmes has a designated team of student engagement and support under the direct management of the Chief Executive Officer and Manager of Student Engagement. The team is composed of the Academic Support Officers (ASOs) who have direct contact and close communication with Holmes' students to provide ground support in each state. Students are encouraged to contact the Student Engagement Team for academic and welfare support or referrals.

4.24 The contact details of Campus Directors, General, Academic and Welfare Support can be found in the Under18 Student Handbook that is located in the Holmes website.

U18 Student Monitoring

- 4.25 Teachers will be informed if they have an U18 student attending their class.
- 4.26 If the U18 student is absent from class the teacher is to report the absence by email to the Campus Director who will contact the student or their Homestay provider to obtain an explanation of the absence. If a student cannot be located for a prolonged period, Holmes' Critical Incident Policy will be triggered and the student's parents or legal guardian, police and/ or Commonwealth, State or Territory agencies notified.
- 4.27 Holmes will routinely interview students under the age of 18 to ensure that their specific individual needs are catered to.
- 4.28 Any potential concerns in relation to a student's safety that arise from routine interviews will be reported back for management review and remediation action taken accordingly.
- 4.29 Holmes will maintain notes regarding all student contact in the student's file.

Communication with Parents and or Legal Guardians

- 4.30 The parents/legal guardians of students will be advised of the U18 student's progress and behaviour through periodic reports.
- 4.31 All official notices sent to the student will also be sent to the student's parent/ legal guardian. For instance, if Holmes intends to cancel a student's enrolment for any reason, Holmes will also notify the parent or legal guardian of the intent and provide reasonable support to the family to return the student home or to transfer the student into the care of another registered provider.

Mandatory Reporting and Critical Incidents

- 4.32 All staff have a responsibility to report any harm that they know has occurred, or reasonably suspect is occurring or likely to occur to under age students. This process is called mandatory reporting. This includes mitigating risk where an U18 student may be exposed to neglect or physical, sexual or emotional abuse.
- 4.33 Australian legislation protects the reporter's identity from disclosure. In addition, legislation provides that so long as the report is made in good faith, the reporter is not liable for the report in any civil, criminal or administrative proceeding.
- 4.34 If a student goes missing from approved accommodation and cannot be contacted, for a period of 24 hours, the student's parents (and the student's agent where appropriate) should be informed and a missing person report filed with the relevant Commonwealth, state and territory agencies.
- 4.35 Disruption to student welfare arrangement is classified as a Critical Incident and the Critical Incident Policy must be followed (Refer to Critical Incident Policy on Holmes website).

Record Management

- 4.36 All documents relating to an U18 student's care arrangements must be included in the student's eFile. This includes any changes to the student's details, parental or

guardianship information or any other matter related to the student’s welfare arrangements. Holmes will ensure to notify DHA via PRISMS of any changes to an U18 student’s accommodation or welfare arrangements, including where a student refuses to maintain Holmes approved accommodation.

4.37 Students’ emergency details must also be routinely checked and updated in the student management system. At the very least Holmes will seek written confirmation of a students’ contact details, including emergency details every 6 months.

4.38 All records of CAAW arrangements are to be kept for a period of 7 years.

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer	Principal of the Secondary College		
Implementation Officers	Campus Directors		
Review Date	June 2022		
Approved by			
Academic Board			
Associated Documents			
Code of Conduct Policy Critical Incident Policy and Procedures Diversity and Equity Policy and Procedure Privacy Policy and Procedure Student Charter and Student Conduct Policy – Higher Education Student Support Policy Under 18 Student Handbook			
Version	Brief Description of the Changes	Date Approved	Effective Date
1.1	Revised Policy (adapted from retired Institutional Policy Manual)	23 August 2018	27 August 2018
1.2	Administrative changes made to ensure policy alignment with VRQA and Ministerial Order No.870. E.g. non delegable responsibilities & the inclusion of a reference to the U18 student Safety Card.	1 May 2019	16 May 2019
1.3	Policy revised to account for VRQA feedback regarding Homestay provider screening verification protocols, specifically inclusion of: <ul style="list-style-type: none"> • Checking personal identification. • Obtaining referrals to confirm suitability, 	6 August 2019	19 August 2019

	<p>and</p> <ul style="list-style-type: none"> • Obtaining evidence of WWCC validity. 		
1.4	<ul style="list-style-type: none"> • Policy revised to link the U18 student welfare arrangement disruption to the revised Critical Incident Policy. • Changed the responsible officer to Principal of the Secondary College and implementation officers to Campus Directors. 	10 July 2020	10 July 2020