



SCHOOL VISION

To encourage children to strive to be their best self, now and in the future, for the betterment of all humanity and the planet.

We action our Vision through our School's Values

COURAGE to do the right thing.

CURIOSITY to know and learn.

CHARACTER to be one's best self.

RESPECT to live wisely and compassionately with others and the planet.

Our School values of Courage, Curiosity, Character, and Respect have been developed through engagement with key stakeholder groups (students, parents, staff, alumni and our Council) and sit at the heart of our education community, guiding every aspect of our learning and decision making.

Purpose

Growing good people in an intellectually rich, supportive and stimulating environment so that they are ready for life.

COMMITMENT TO CHILD SAFETY

At St Margaret's Berwick Grammar (SMBG), ensuring every child feels safe is our top priority. We have a zero-tolerance towards child abuse and strive to create a safe and welcoming environment where children feel secure at all times. We foster positive relationships among students, staff, and peers, based on trust and respect. We actively identify and address any potential safety risks for students, taking any concerns about child safety seriously and responding promptly and thoroughly.

Our staff are dedicated to safeguarding students from abuse or harm within the school environment, working with students to establish a supportive and collaborative atmosphere for learning and quality teaching. They adhere to child safe standards and expectations for appropriate behaviour when interacting with children.

DIVERSITY AND INCLUSION

At SMBG we prioritize cultural safety and inclusivity for all children, including those from diverse backgrounds and those with disabilities. We believe these principles are essential for the safety of every child. We pay special attention to culturally diverse students, students with disabilities, and students who may be vulnerable. Any inappropriate or harmful behaviours, directed at students based on these or other characteristics, is not tolerated at our school. Individual student concerns are acted upon in a sensitive and timely manner, and the information and strategies shared on a need-to-know basis within the School. We take immediate action to address and resolve such instances.

OVERVIEW

St Margaret's Berwick Grammar (SMBG) provides all support and general welfare arrangements for students under the age of 18. The School does not delegate, outsource or contract out this responsibility to any third party.

Before a student visa can be granted to a student under 18 years of age the Australian government must be satisfied that there is appropriate accommodation support and general arrangements in place for the periods that the students will be under 18 in Australia.

This document:

- provides the framework of welfare and accommodation options that must be maintained while the student is under the age of 18 and studying at SMBG.
- provides the operational guidelines for the selection, screening and monitoring of all homestay providers and accommodation.
- provides the operational guidelines for the management of risk for underage students.
- ensures the school is compliant with ESOS legislation and the National Code.

DEFINITIONS

See table below.

Term	Definition
CAWW	Confirmation of Appropriate Accommodation and Welfare Letter.
COE	Confirmation of Enrolment
Direct Homestay	Direct homestay is where the parents of the student nominate local family members or close family friends as a homestay for the student.
Eligible Relative	<ul style="list-style-type: none"> • a parent, spouse, de facto partner, brother, sister, stepparent, stepbrother, stepsister, grandparent, aunt, uncle, niece or nephew, or a step-grandparent, step-aunt, step-uncle, step-niece or step-nephew; and • nominated by a parent of the applicant or a person who has custody of the applicant; and • aged at least 21; and • of good character, and show this by providing a police clearance from the countries in which they have lived for more than 12 months in the past 10 years after the age of 16; and • an Australian citizen, permanent resident or be eligible to remain in Australia until the overseas student's visa expires or the overseas student turns 18 years of age (whichever happens first).
Indirect Homestay	Indirect homestay is where the School finds an appropriate homestay for the student. The School will only consider indirect homestay where a student has been staying with a nominated

Term	Definition
	guardian or in direct homestay where, due to a change in circumstances the student needs to change to an indirect homestay.
PRISMS	Provider Registration and International Student Management Systems.
The School	The School means St Margaret's Berwick Grammar (SMBG) and it's two campuses in Berwick and Officer, Victoria, Australia.

POLICY PRINCIPLES

All overseas students who are underage must have appropriate accommodation arrangements in place that meet SMBG's criteria for approval and/or is deemed appropriate according to DHA. Private rental accommodation without care arrangements in place is not permitted.

All international students are provided with culturally and appropriate child safe and child abuse information and reporting processes as part of their orientation program. All staff and volunteers of SMBG make every attempt to create a supportive and cooperative environment conducive to learning and quality teaching. They are also required to observe child safe principles and expectations for appropriate behaviour towards and in the company of children. To this end all staff and volunteers are required to sign the schools Child Safety Code of Conduct, in which they agree to adhere to observing standards, acknowledged their responsibility to adhere to the child safe principles and expectations for appropriate behaviour towards and in the company of children and immediately report any breach of this code.

Underage students are monitored by the Head of House with support from the Head of Wellbeing Girls/Boys and school psychologists. Teachers who work with students in the course or their duties will have a current Victorian Institute of Teaching registration which includes a Working with Children and Police check. International students are further supported through the School's International Student Coordinator who is a primary contact for students and their families.

International Student Safety Card

All international students are provided with an International Student Safety Card as part of their orientation (International Student Orientation Checklist) that includes:

- The student's home in Australia information.
- Emergency Contacts e.g. police.
- Emergency School Contacts.
- How to Raise Concerns and Complaints with the VRQA.

ACCOMODATION AND WELFARE OPTIONS

International Students, who are under 18, have two accommodation and welfare options when studying with SMBG:

- **stay in Australia with a ‘nominated guardian’ approved by the Department of Home Affairs**, who can be the overseas student’s parent, person who has legal custody, or an eligible relative who is aged over 21 and is of good character; or
- **stay in homestay accommodation**, where support and general welfare arrangements that have been approved by the School against which the School has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter. This accommodation option is only available to students who are 13 years or older.

HOMESTAY OPTIONS

The School has two types of homestay categories ‘Direct’ and ‘Indirect’.

- **Direct homestay** is where the parents of the student nominate local family members or close family friends as a homestay for the student.
- **Indirect homestay** is where the School finds an appropriate homestay for the student. The School will only consider Indirect homestay where a student has been staying with a nominated guardian or in Direct homestay but due to a change in circumstances needs to change to an Indirect homestay.

In either homestay environment the School will follow the homestay protocols as detailed in this document.

Staying with a Nominated Guardian (Direct Homestay)

If an overseas student is under the age of 18, a parent, legal custodian, or an eligible relative can be nominated to take responsibility for the overseas student’s accommodation, welfare and support in Australia. The parent, legal custodian or eligible relative must have an appropriate visa or have applied for a Student Guardian visa (subclass 590).

An eligible relative is:

- a parent, spouse, de facto partner, brother, sister, stepparent, stepbrother, stepsister, grandparent, aunt, uncle, niece or nephew, or a step-grandparent, step-aunt, step-uncle, step-niece or step-nephew; **and**
- nominated by a parent of the applicant or a person who has custody of the applicant; **and**
- aged at least 21; **and**
- of good character, and show this by providing a police clearance from the countries in which they have lived for more than 12 months in the past 10 years after the age of 16; **and**
- an Australian citizen, permanent resident or be eligible to remain in Australia until the overseas student’s visa expires or the overseas student turns 18 years of age (whichever happens first).

Homestay Protocols

The Department of Home Affairs will assess the nominated arrangements according to the Migration Regulations 1994 and, if approved, the parent, legal custodian or eligible relative will be the overseas student’s **‘nominated guardian’**.

If the School becomes aware the international student is not being well looked after the School will contact the contact Department of Home Affairs and other local agencies.

International Students living with Nominated Guardian must keep the school informed with respect to changes of their accommodation arrangements. Students should discuss any proposed changes with the International Students Coordinator wherever possible.

Receptionists or Student Administration should refer all students under 18 to the relevant **Head of Students** when they are notified of changes.

The School will advise the Department of Foreign Affairs as soon as possible in the event that an under 18-year-old international student has changed their living arrangements or no longer approves of the arrangements for the student via **PRISMS (Provider Registration and International Student Management System)**.

It is a requirement of the Department of Home Affairs international students must confirm their living arrangements addresses every six months. The school will request this information via email and ask the Nominated Guardian to verify the information.

Students who do not provide updated personal details within five business days will be in breach of their visa conditions and risk having their visas cancelled.

International students who changed their accommodation arrangements without the necessary approvals will be regarded as breaching their student visa conditions and may be reported to the Department of Home Affairs as a result.

Homestay and Welfare Arrangements

If a student who is under the age of 18, but over the age of 13, advises the School that they need a homestay, then the School may accept responsibility for the welfare arrangements of the student.

If the School agrees to accept responsibility for the welfare arrangements of the student, the School will create a **Confirmation of Appropriate Accommodation and Welfare Letter (CAAW)** letter at the same time as a **Confirmation of Enrolment (COE)**.

SMBG's responsibility for underage students commences from the Confirmation of Enrolment's (COE) + 7 days or at the commencement of homestay arrangements, whichever one is the earliest and ceases when the student completes their course, withdraws from the course or transfers to another provider whichever is sooner.

If the student wishes to arrive in Australia ahead of the date in the CAAW, the student must contact the School and ask for permission. **The School reserves the right to refuse early arrival if welfare requirements are not in place for this period.**

If the student is under the age of 18, they must stay in accommodation approved by the School unless other accommodation is approved by the School in its place.

The School retains the ultimate responsibility for approving and assuring welfare arrangements of the student under the issued CAAW until the overseas student:

- is outside Australia; or
- turns 18; or
- transfers to another provider's CAAW; or
- enters the care of a nominated guardian approved by the Department of Home Affairs.

HOMESTAY ONBOARDING AND MANAGEMENT

Roles and Responsibilities

The onboarding, management, screening, monitoring, approval and Review of a Homestays is the responsibility of the **Director of Engagement**. In addition to the Director of Engagement, the checks involved in the onboarding and review of homestays may be made by **the International Student Coordinator or the Admissions and Enrolment Officer**.

Homestay Checklists

Homestay is only available for international students aged 13 years and over, studying in Years 7 to 12 where the School issues a CAAW letter accepting the responsibility for the wellbeing of the student while they study at our School.

The tools used to assess a homestay are the

- **Homestay - Check List – Onboarding,**
- **the Student Preference Sheet** and
- **the Homestay – Check List - Review.**

These check lists aim to ensure that homestays are suitable, age appropriate and meet the preferences of the student. They also ensures that all appropriate parameters for a homestay appointment are review and collected.

These include:

- Information to screen a host and family.
- Verifying that the accommodation and living arrangement meet the needs of the student and are age appropriate.
- Ensuring all adults living in the house have a validated Working With Children Check (WWCC).
- Ensuring all adults in the house receive child safety training and information on the School's Child Safe Policy and Code of Conduct and their families receive.
- Ensuring the International Student Coordinator will have regular formal and informal meetings with the International Student to check on their welfare.

St Margaret's Berwick Grammar provides all support and general welfare arrangements for students under the age of 18. The School does not delegate, outsource or contract out this responsibility to any third party.

COMMUNICATION

Any questions or queries related to this policy should be directed to the Director of Engagement.

RELATED DOCUMENTS

- Child Safe Presentation – 3rd Parties (Including Homestay Hosts)
- Child Safe Presentation – Students
- Confirmation of Appropriate Accommodation and Welfare (CAW)
- Confirmation of Enrolment (COE) (PRISMS)
- Homestay – Checklist Onboarding

- Homestay – Checklist Review
- Homestay Agreement
- Homestay Code of Conduct
- Homestay Student Code of Conduct
- Homestay Student Information Sheet
- International Student Orientation Checklist
- International Student Orientation Presentation
- International Student Safety Card
- International Student Wellbeing Model
- Student Homestay Preference Sheet

RELATED TOOLS

- NEXUS
- PRISMS
- School's Crisis App / Card
- TASS / Teacher Kiosk
- Visa Status Check VIVO
- WWCC Victoria Website Checklist Status Tool

RELATED POLICIES AND RESOURCES

These guidelines should be read in conjunction with other School policies and procedures

Australia Homestay Network (AHN)

Child Safety and Wellbeing Policy

Child Safety Code of Conduct

Complaints and Grievances Policy – Community (under review)

Complaints and Grievances Policy – Students (under review)

Emergency Evacuation Procedure

Emergency Management Plans – Officer and Berwick Campuses.

Education Services for Overseas Students (ESOS Framework) – Australian Government Department of Education

Enrolment Policy

Four Critical Actions Poster for Schools - PROTECT

Inclusive Education Policy (under review)

Responding to Suspected Child Abuse Template (Schools) – PROTECT

Victorian Registrations and Qualifications Authority (VRQA) Minimum Standards for School Registration.

REVIEW

This policy will be reviewed annually or after a mandatory report is made to the relevant authorities.

Document Owner	Director of Engagement
Approved by Principal	July 2025
Published – Nexus, Website	July 2025
Next Review	November 2028



APPENDIX - HOMESTAY ONBOARDING AND REVIEW PROCEDURES

Onboarding

- The Admissions Team must check the student's age, as detailed in their passport. The student must be over 13 years old at the time of commencing their Homestay at the School.
- Families are provided with a **Homestay Preference Sheet**, which is designed to help identify suitable homestays to the needs of the student.
- Where possible the School will provide multiple options for the student/family to consider, prior to committing to a specific homestay.
- On the issue of a Letter of Offer, The Admissions Team should contact review homestay options available from the current database and if required engage external providers for additional homestay options.
- In all instances a homestay options should be reviewed using **the Homestay - Check List – Onboarding** prior to being provided to the family.
- On receipt of Homestay options these should be shared with the family, with potential transport options. Screening includes:
 - Physical visiting of the property and meeting the homestay host(s).
 - Ensuring that the host is over 21 years of age, of good character; and has an appropriate visa to remain in Australia until the overseas student's visa expires or the overseas student turns 18.
 - Ensuring all adults (people over the age of 18) living in the household a Working With Children Check (WWCC). Physically provided information must be checked against the WWCC Victorian Website Check Status Tool.
 - Ensuring that the host is qualified to be a host with experience in looking after children or having appropriate qualifications.
 - Ensuring that the homestay is appropriate for the age of the homestay child.
 - **Reviewing the facilities of the house. including:**
 - That the student has their own bedroom for their exclusive use
 - That the student is provided with three meals per day, seven days per week, including a cooked evening meal
 - That the bedroom has appropriate facilities including bed, wardrobe, desk, chair and study light
 - That the student will be provided with towels and linen
 - That the student has full use of the house common areas
 - Ensure that necessary utilities are available including gas, electricity, heating, water and the internet.
 - That the student will have access to laundry facilities.
 - That the student can get to school from the homestay location

- Understand the expectation for the student to be involved in cleaning of common living areas
- The homestay host is also provided with:
 - Student and Parent contact details
 - School contact information
 - School emergency contact information
 - Policy information
 - Useful welfare and school information.

Review of Homestay Arrangements

- The homestay will physically be reviewed every six months at a minimum. The School will use its **Homestay – Check List - Review** for this process.
- All adults (people over the age of 18) living in the household should have their Working With Children Check (WWCC) status reviewed. Physically provided information must be checked against the **WWCC Victorian Website Check Status Tool**.
- As part of the homestay review process a separate interview with the student will be conducted to understand any issues and to reconfirm the students' mobile phone number and email address.
- A homestay may not need to be reviewed, if a previous review for another student occurred with 3 months of the previous check.

As part of the homestay screening process the School will also providing training and information with regards to Child Safe Standards and the reporting processes relating to child abuse.

The School also provides information to homestay hosts advising them of their responsibilities and provides the host with a range of tools including:

- Code of Conduct – Homestay Host
- Code of Conduct – International Student

The Homestay hosts details should be added to TASS Addresses (Residential) with the following communication permissions:

- TK View
- Lives With
- Emergency Contact
- TK Correspondence
- TASS Correspondence
- Academic Report
- Access to Parent Lounge and Nexus

Student Complaints

Students in a homestay who are experiencing problems or have concerns about the suitability of their accommodation welfare arrangements should inform the International Student Coordinator so that the concern can be investigated and responded to in five working days.

Approving arrangements for Term and Semester Breaks

Students in homestay who are residing in Australia in any of the above situations may be allowed to temporarily change their accommodation arrangements other than returning home during semester break provided the following conditions are met:

- Students to meet with the relevant **Head of Students** at least four weeks prior to the end of semester of a change being made
- Parents or legal custody of the student must approve the temporary arrangements

The school reserves the right to refuse an application where it feels the student's welfare will be put at risk by the change

International students who changed their accommodation arrangements without the necessary approvals will be regarded as breaching their student visa conditions and may be reported to the Department of Home Affairs as a result.

Homestay and Providers of Services to International Students

The School does not delegate, outsource or contract out this responsibility to any third party. SMBG's external provider(s) that assist in the provision of services offered by the school include the **Australia Homestay Network (AHN)**.

This organisation assists the School in the following ways

- Assists in the identification of homestay options for the School.
- The Provision of insurance for homestay and students, for hosts introduced to the school by AHN.
- All communication with the student, families and hosts is via the School. There is no direct engagement with the provider. The School directly engages the host.

Training Homestay and Providers of Services to International Students on their Child Safe Obligations

As part of the school's child safe obligations the school facilitates child safe training at the commencement of a provider's engagement and then annually thereafter. The training aims to ensure providers understand and use the school's processes for reporting suspected child abuse. The Training is conducted by the Director of Engagement or delegate.

Training is online via presentation and shared.

Transferring to another Registered Provider

If an international student who is under 18 on a CAAW wishes to transfer to another registered provider, the receiving registered provider must ensure there is no gap in welfare arrangements.

In accepting the overseas student, the receiving provider must liaise with SMBG to ensure appropriate welfare in place at all times and issue a CAAW letter covering the transition from one accommodation arrangement to another. This is the reverse if SMBG is receiving an international student from another provider.

Disruption to welfare arrangements

Should a student on a CAAW face a disruption to their welfare arrangement the school will activate its Emergency Management Response.

Suspension or Cancellation of Enrolment

If the School decides to or needs to suspend or cancel the enrolment of an international student on a CAAW, the School remains responsible for the student's welfare until one of the following occurs:

- the overseas student has alternative welfare arrangements approved by another registered provider; or
- the overseas student has a nominated guardian approved by the Department of Home Affairs; or
- the overseas student leaves Australia; or
- the registered provider has notified the Department of Home Affairs through PRISMS that it is no longer able to approve the overseas student's welfare arrangements; or
- the registered provider has taken the required action under Standard 5.5 after not being able to contact the overseas student; or
- the overseas student turns 18.

Terminating a registered provider's responsibility for welfare arrangements

The School may terminate CAAW welfare arrangement under two circumstances:

1. If alternative welfare arrangements have been put in place.
2. Where the School can no longer take responsibility for the overseas student due to events, such as:
 - the international student refuses their accommodation or leaves their accommodation without notice, even after the registered provider has exhausted all possible avenues of assisting the overseas student to maintain appropriate arrangements.
 - the homestay host becomes unable to maintain arrangements and an alternative cannot be found.
 - the overseas student's enrolment being suspended or cancelled; or
 - the overseas student going missing from their accommodation and cannot be found or contacted, even after the registered provider has implemented its critical incident policy.

In the above situations, the School will report the international student within 24 hours using the **'Non-Approval of Appropriate Accommodation/Welfare Arrangements'** letter through PRISMS.

This report is used as a last resort, as it may lead to cancellation of the overseas student's visa by the Department of Home Affairs for breaching visa condition 8532.

The School will make all reasonable efforts to ensure the overseas student's parents or legal custodians are notified immediately if it can no longer take responsibility for the overseas student's welfare.

Staff Training – Homestay Onboarding and Management (Specific)

The onboarding and management of homestays is the responsibility of the Director of Engagement. Checks related to the onboarding and review of homestays may be made by the **International Student Coordinator** or the **Admissions and Enrolment Officer**.

These staff members are regularly (annually at least) trained in the use of the relevant checklists to ensure that students and homestays are appropriately onboarded.

The tool used to assess a homestay is the **Homestay - Check List – Onboarding**. This check list ensures that a homestay is suitable and age appropriate. It also ensures that all appropriate parameters for a homestay appointment are reviewed and collected.

These include:

- Information to screen a host and family.
- Verifying that the accommodation and living arrangements meet the needs of the student and are age appropriate.
- Ensuring all adults living in the house have a validated Working with Children Check.
- Ensuring all adults and their families involved in the homestay receive child safety training and information on the **School's Child Safe Policy and Code of Conduct** and that
- Staff are also trained on the requirement of 6 monthly homestay reviews. The tool used to access homestays at this point is the **Homestay – Checklist – Review**. This document ensures all items in the **Homestay - Check List – Onboarding** are reviewed.
- Staff also receive scenario training in emergency management and critical incidents as outlined in the Schools Emergency Management Response.

Staff Training – Managing the International Student Program

St Margaret's Berwick Grammar recognises that managing international students, which are an additional subset of the broader student cohort, requires additional training and support for all staff, but especially staff that consistently interact and take a leadership role to ensure these students are safe and regulatory requirements are met.

The School also recognises that the international student cohort is one of the most vulnerable cohorts of the student body, particularly those young students who are attending the School and living away from home in a homestay.

The School has therefore implemented, as per its obligations, a process of continuous training for all staff relating to **Child Safe, Child Safety Code of Conduct, Child Protection and Mandatory Reporting**.

In addition, key staff are provide with additional information that relates to the management of the broader management of the International Student Management Program which includes.

- Review of the ESOS Act
- Review of the National Standards
- Review of VRQA Standards and Ministerial Orders
- Review of Specific International Student Policies
- Review of Specific International Student Procedures
- Review of Specific International Student Tools
- Review of the Schools Emergency Management Response
- Admissions Staff also review PRISMS

Key staff include:

- International Student Coordinator
- Admissions Team
- Heads of House
- Heads of Students
- EAL Staff
- Leading Leaders
- Executive Leadership Team

International Student Coordinators are part of the **Schools Emergency response team** with access to Emergency Contacts via the **Schools Crisis Card and Crisis App**.

Administrative Procedures

Students will be informed about this policy through their orientation program.