

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

The School – means St Margaret's Berwick Grammar (SMBG) and its 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 are not permitted.

SMBG is a child safe environment. The school actively promotes the safety of wellbeing of all students and all staff are committed to protecting students from abuse or harm in the school environment. 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. The School cultivates, articulates and reinforces the core values on which all communication is based.

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.

Accommodation and Welfare Options

International Students, who are under the of 18, have two accommodation and welfare option 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.
 - homestay is only available students who are 13 years or older.

Staying with a Nominated Guardian

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, step-parent, step-brother, step-sister, 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).

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. Receptionist or Student Administration should refer all students under 18 to the Head of Wellbeing Girls/Boys 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.

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 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 or withdrawals 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

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 maybe made by International Student Co-ordinator or the Admissions and Enrolment Officer.

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 studying at our School.

The tools used to assess a homestay is the **Homestay - Check List – Onboarding, 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 who will have regular formal and informal meetings with the International Student to check on their welfare.

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Homestay Onboarding and Review Procedures

Onboarding

- Admissions Team must students age, as detailed in their passport, will 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 issuing of a Letter of Offer, The Admissions Team should contact review homestay options available from 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 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 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

- 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 regarding unsuitability of accommodation welfare arrangements

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 Head of Wellbeing Girls/Boys 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:

- Australia Homestay Network (AHN)
 - Assists identification of homestay options for the School.
 - 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 the age of 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. In addition to the Director of Engagement, the checks involved in the

onboarding and review of homestays maybe made by International Student Co-ordinator or the Admissions and Enrolment Officer.

To ensure that homestays are appropriately onboarded and meet the standards of the school training of responsible staff is completed when they commence at the school and then annually.

The tool used to assess a homestay is the **Homestay - Check List – Onboarding**. This check list ensures that a homestay suitable and age appropriate. It 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.
- 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.

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.

Responsibility for this Policy: Principal

Policy Location: Nexus

Policy Review: Annually or after a mandatory report is made to the relevant authorities

Related Documents

- Homestay – Checklist Onboarding
- Student Homestay Preference Sheet
- International Student Safety Card
- International Student Orientation Checklist
- International Student Orientation Presentation
- International Student Wellbeing Model
- Homestay Student Information Sheet
- Homestay Agreement
- Homestay Code of Conduct
- Homestay Student Code of Conduct
- Homestay – Checklist Review
- Child Safe Presentation – Students
- Child Safe Presentation – 3rd Parties
(Including Homestay Hosts)
- Confirmation of Enrolment (COE) (PRISMS)
- Confirmation of Appropriate Accommodation
and Welfare (CAAW) (PRISMS)

Related Policies

- Child Safe Policy
- Child Protection Mandatory Reporting and Reportable Conduct Policy
- Child Safety Code of Conduct
- Raising Concerns and Complaint Policy
- Student Wellbeing Policy
- Enrolment Policy
- International Student Support Service Policy

Related Tools

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