Welfare Arrangements for Under 18 International Students Procedure

Section 1 - Purpose

(1) This Procedure outlines the welfare arrangements for international students under the age of 18 who are studying at the University of Canberra (University) and the University of Canberra College (UCC).

(2) The University and the University of Canberra College (UCC) are subject to the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018) a legislative instrument made under the Education Services for Overseas Students Act 2000.

Section 2 - Scope

(3) This Procedure applies to all international students under the age of 18 enrolled at the University or UCC.

Section 3 - Policy

(4) Refer to International Student Policy.

Section 4 - Procedure

Admission and Pre-arrival

(5) For students under the age of 18, the University will nominate the dates for which it accepts responsibility for the student's accommodation, support and general welfare arrangements and advise the Commonwealth Department responsible for Immigration.

(6) Future Student Services will issue a Confirmation of Enrolment (CoE) and Confirmation of Appropriate Accommodation and Welfare (CAAW) form to students who are under the age of 18.

(7) CoEs and CAAW forms will be issued once the University receives confirmation of the student's accommodation and welfare arrangements from the third party provider(s) the University has engaged to deliver these services.

(8) Student Wellbeing & International Support (SWIS) will run regular reports to identify students whose welfare is the responsibility of the University. SWIS will contact the student via their nominated personal email welcoming the student to the University and providing assistance and guidance to:

a. arrange an airport/bus station pickup through the online booking form; and
b. make an appointment to meet the Manager, Student Wellbeing and Support (or delegate) upon arrival in Canberra.

Arrival and Orientation

(9) Under the requirements of the National Code 2018, the University must provide age- and culturally-appropriate orientation to under 18 international students regarding contact and support services available at the University (and/or UCC). This activity is undertaken during Orientation Week by SWIS.

(10) Alternative orientation arrangements will be made for students who arrive after Orientation Week. Regarding the student's accommodation, the welfare provider is responsible for providing the student with a local orientation.

(11) If SWIS has not been contacted by the welfare provider or the student within one week of the arrival date, SWIS will follow up with the student to arrange a meeting.

(12) At the first meeting with the student, SWIS will:

a. update the student's contact and address details in both the University and PRISMS systems;
b. check the contact details of the parents/legal guardian and update if necessary; and
c. check that the student has participated in the University's Orientation for International Students Program, as relevant.

(13) If an under 18 student has not participated in the relevant orientation program, SWIS will provide them with information on:

a. safety and emergency contacts;
b. support services;
c. consequences of a breach of their student visa; and
d. grievance processes.

(14) SWIS will check that the student has received a local orientation from the welfare provider and is comfortable with the current welfare and accommodation arrangements (and follow- up with the welfare provider if any problems are found).

Monitoring of Student During Studies

(15) SWIS will maintain regular contact with the welfare provider regarding the accommodation, support and welfare arrangements of the student.

(16) If it is reported that a student is missing meetings with the welfare provider, SWIS will contact the student to arrange a meeting with the Manager, Student Wellbeing and Support (or delegate).

(17) Where it is found that the welfare provider is not maintaining the required contact with the student, the Manager, Student Wellbeing and Support will report this in writing to the welfare provider's management for investigation and action where required.

At-risk Students

(18) Where a student refuses to maintain the accommodation arrangements approved by the University, the matter will be escalated in accordance with the University's Resilience Management Framework and may result in the cancellation of the CAAW.

(19) Where the Director, Student Life considers it appropriate to cancel a student's CAAW, the student and their legal guardians will be informed in writing of the decision, in accordance with the University's Student Grievance Resolution Policy.

Accommodation

(20) International students under the age of 18 must maintain their accommodation arrangements as approved by the University. Students may not at any time or for any period stay anywhere other than the agreed accommodation except with the prior written approval of the University and a parent/legal guardian.

(21) The University will ensure that the approved homestay provider has appropriate documented procedures for checking the suitability of accommodation for international students under the age of 18.

(22) The University will ensure the employees of the accommodation and welfare provider have all the working with children and young people clearances required under State and Territory legislation.

(23) Students seeking a permanent accommodation change must seek approval from the University and the welfare provider. Accommodation changes require approval in writing from the student's parents or legal guardian. Once approvals are finalised, the 'Approval to Change Accommodation/Welfare Arrangements' letter will be updated via PRISMS.

(24) If the accommodation change is not approved, and the student refuses to maintain the current care arrangements, the matter will be referred to the Director, Student Life. Failure to resolve the matter may result in the Director, Student Life reporting the non-approval of the arrangements to the Commonwealth Department responsible for Immigration and cancellation of the student's CAAW and CoE. Reports will be made through the 'Non- Approval of Appropriate Accommodation/Welfare Arrangements' letter via PRISMS.

(25) Students seeking a brief, temporary accommodation change must first seek approval from the welfare provider who will notify the Manager, Student Wellbeing and Support. Such requests will be considered based on compelling need and whether the temporary accommodation arrangements are appropriate and will require written authorisation from the parent or legal guardian.

(26) If the University is no longer able to approve the welfare arrangements of a student, it must make all reasonable efforts to ensure that the student's parents or legal guardians are notified immediately.

(27) The University must advise the Commonwealth Department responsible for Immigration as soon as practicable if:

a. the student will be cared for by a parent or nominated relative approved by the Commonwealth Department responsible for Immigration;
b. a CAAW is no longer required within 24 hours; and
c. the registered provider is no longer able to approve the student's welfare arrangements.

(28) Where a student is reported to have stayed at accommodation not approved by the University, the University may report the student for breach of their welfare arrangements, particularly if the student has moved permanently to alternative accommodation without the correct approvals. In such instances the matter will be escalated in accordance with the University's Resilience Management Framework to the Director, Student Life.

Welfare Issues

(29) University staff must report all concerns about the health, general welfare, academic performance and/or attendance of an international student under the age of 18 years to the Manager, Student Wellbeing and Support.

(30) Where concerns have been raised by any parties regarding an under 18 international student's welfare, SWIS will provide support and referral as appropriate.

(31) If the University is unable to contact a student and has concerns for the student's welfare, the University must make all reasonable efforts to locate the student, including notifying the police and any other relevant

Commonwealth, State or Territory agencies as soon as practicable.

(32) Where a student reports to the University that they are having problems with any aspect of the service provided by the welfare provider or the homestay provider, the Manager, Student Wellbeing and Support will liaise with the welfare provider's administration and/or the homestay provider's head office in an attempt to resolve the problems. Serious issues will be reported to the Director, Student Life.

Critical Incidents

(33) Critical incidents and potential critical incidents involving international students under the age of 18 are to be dealt with under the terms of the University's Resilience Management Framework and Business Continuity Plans.

(34) University staff should be mindful that incidents involving international students under 18 years of age, whilst not necessarily critical for students aged 18 or over, may be critical purely because of the student's underage status.

Transferring to Another Provider

(35) Applications for a transfer to another education provider by international students under the age of 18 will be considered under the International Student Policy and International Student Transfer Assessment Procedure. In processing such applications, however, SWIS must:

a. verify that the student has appropriate welfare arrangements at the new institution (this can be done by the new institution providing evidence of the new welfare arrangements directly to the University to ensure there is no gap); and
b. arrange for the welfare provider to provide a letter of support from the student's parent or guardian.

Termination of CAAW and/or Enrolment

(36) Where the University finds that a student has breached the CAAW, the University may cancel the CAAW and inform the Commonwealth Department responsible for Immigration. Students and their parents or legal guardian will be informed in writing immediately prior to the cancellation of the CAAW.

(37) Once the CAAW is cancelled, unless acceptable alternative living arrangements can be made (such as the student living with a parent, legal guardian or relative aged over 21 nominated by the parent or legal guardian), the University will cancel or suspend the student's enrolment and report the matter to the Commonwealth Department responsible for Immigration.

(38) Where an enrolment is terminated, suspended or cancelled, the University will continue to be responsible for the student's welfare arrangements until:

a. the student presents evidence of a transfer to another registered education provider and that provider submits to the University evidence of change of course/provider and evidence that it has taken responsibility for the accommodation, welfare and support arrangements for the student; or
b. care of the student by a parent or nominated relative is approved by the Commonwealth Department responsible for Immigration; or
c. the student leaves Australia; or
d. the University reports to the Commonwealth Department responsible for Immigration that it can no longer approve the arrangements for the student.

Selecting, Screening and Monitoring Third Party Welfare and Accommodation Providers

(39) The University will verify and document that a student's accommodation provided by a third party provider is

appropriate to the student's age and need:

a. prior to the accommodation being approved; and
b. at least every six months thereafter.

(40) The selection and screening process for third party welfare and accommodation involves:

a. an initial meeting with the service provider to gain an understanding of the business and its operations;
b. ensuring the service provider has suitably qualified staff;
c. ensuring the staff of the service provider all have working with children and young people clearances as required under State and Territory legislation;
d. ensuring the service provider has checks and balances in place to ensure students do not at any time or for any period stay anywhere other than the agreed accommodation except with the prior written approval of the University and their parent/legal guardian; and
e. obtaining and verifying the service provider's policies and procedures in relation to screening, selecting and monitoring its homestay hosts.

(41) Third-party service provider policies and procedures must include, at a minimum:

a. completing an onsite home inspection, to ensure that the property is suitable to accommodate international students (unless the property has been verified by a site visit in relation to another student in the previous six months);
b. taking photos of the proposed living arrangement, including the student's bedroom, bathroom facilities, kitchen, and shared areas and keeping a record of those photos;
c. a follow-up process for verifying the accommodation is suitable at least every six months thereafter;
d. provisions for maintaining up-to-date records of the student's contact details, including the contact details of any adult responsible for the student's welfare;
e. vetting all adults associated with the accommodation/homestay have the appropriate working with children and young people clearances required by State and Territory legislation; and
f. a process for advising the University as soon as an emergency situation arises or when welfare arrangements may be disrupted for students under 18 years of age.

(42) Once screening is completed and approved, a service agreement that will include regular reporting requirements will be prepared by Legal and provided to the service provider for agreement and signature.

Section 5 - Roles and Responsibilities

WHO	RESPONSIBILITIES
Manager, Student Wellbeing and Support	• Overseeing all student wellbeing services.
SWIS Staff	• Monitoring to identify at-risk students. • Coordinating orientations. • Coordinating with third-party welfare providers.
Director, Student Life	• Reviewing Confirmation of Appropriate Accommodation and Welfare (CAAW) forms. • Responding to serious accommodation issues. • Responding to serious student welfare issues.
Future Student Services	• Issuing a Confirmation of Enrolment (CoE). • Issuing a Confirmation of Appropriate Accommodation and Welfare (CAAW).

WHO	RESPONSIBILITIES
Third Party Welfare and Accommodation Providers	• Providing suitable welfare and accommodation arrangements on behalf of the University. • Maintaining welfare and accommodation arrangements in accordance with relevant legislation, standards, University policies and provider policies.
Legal	• Preparation of service agreements for contracting third-party providers.

Section 6 - Definitions

TERMS	DEFINITIONS
Confirmation of Enrolment (CoE)	A document, provided electronically, which is issued by the University to intending international students and which must accompany their application for a student visa. The document must be produced using the Commonwealth Government's PRISMS system. It confirms the international student's eligibility to enrol in the particular course at the University or University of Canberra College.
International Student	Has the same meaning as overseas student in Section 5 of the ESOS Act. That is: a person (whether within or outside Australia) who holds a student visa, but does not include students of a kind prescribed in the ESOS Regulations.
Provider Registration and International Student Management System (PRISMS)	The system used to process information given to the Secretary of the Commonwealth Department responsible for Education.

Status and Details

Status	Current
Effective Date	1st January 2018
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Expiry Date	To Be Advised
Custodian	Michelle Lincoln Deputy Vice-Chancellor
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