# Under 18 International Students Procedure

## Section 1 - Governing Policy

(1) These Procedures are governed by the Under 18 International Students Policy.

## Section 2 - Scope/Application

(2) These Procedures apply as set out in the Under 18 International Students Policy. Where the University delivers the Foundation Studies Program outside Australia, these Procedures will be applied having regard to the legal, regulatory and safeguarding requirements of the relevant jurisdiction, consistent with the Under 18 International Students Policy.

(3) This Procedure is to be read in conjunction with relevant University policies, including the Under 18 International Students Policy, Admission to Coursework Programs Policy, Safeguarding Children, Young People and Adults at Risk Policy, Critical Incident Management Policy, Privacy Policy and Standard 5 of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018.

## Section 3 - Enrolment of International Students Under the Age of 18

(4) The University only approves welfare, support and accommodation arrangements, and issues a Confirmation of Appropriate Accommodation and Welfare (CAAW), for students enrolling in the Foundation Studies Program.

(5) Under no circumstances will the University enrol international students who are under 17 years of age at the commencement date of the course.

(6) International students under 18 years of age who are going to live in Australia with a 'guardian', as defined in the Migration Regulations 1994 (Cth), must request approval from the relevant Australian Government department. The University will not be responsible for their welfare and accommodation arrangements. The nominated 'guardian', as defined in the Migration Regulations 1994 (Cth), must meet the relevant Australian Government department's requirements.

(7) International students under 18 years of age enrolling in the Foundation Studies Program may request the University to take responsibility for their welfare arrangements until they turn 18. Students must use specific welfare and accommodation service providers approved by the University. The University will then be responsible for their accommodation and welfare arrangements, issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) together with a Confirmation of Enrolment (CoE) for the purpose of applying for a student visa.

(8) The University will only approve the welfare, support and accommodation arrangements once provided with copies of binding agreements with the accommodation service provider and the welfare service provider. Approved support, accommodation and welfare arrangements must be confirmed from at least seven days prior to the Foundation Studies Program commencement date until seven days after the last day of study indicated in the Confirmation of

Enrolment (CoE), or until the student turns 18 years of age.

(9) The University will inform the relevant Australian Government department of the dates for which the University will begin and cease to take responsibility for the student via the Provider Registration and International Student Management System (PRISMS).

(10) International students under 18 years of age seeking variations of enrolment must contact the International Student Advisor for further assessment in accordance with Section 6 clause(24) of this Procedure.

(11) Where the University enrols an international student under 18 years of age whose welfare arrangements are approved by another registered education provider, the International Student Advisor must:

a. liaise with the releasing registered provider to negotiate and confirm the date of transfer of responsibility for the student's welfare arrangements, ensuring there is no gap in approved welfare arrangements;
b. confirm in writing the agreed welfare transfer date with the releasing provider and retain this confirmation in the student's file;
c. advise the student, and where appropriate their parent(s) or legal guardian, of the student's visa obligations in relation to maintaining continuous approved welfare arrangements until responsibility is formally transferred; and
d. ensure that the commencement date of the University's welfare responsibility is accurately recorded and, where required, reported to the Department of Home Affairs via PRISMS.

# Section 4 - Appointment and Selection of Welfare and Accomodation Service Providers

(12) The appointment of welfare and accommodation providers will be undertaken by a committee comprising the Pro Vice-Chancellor (Global), the Associate Director, International Admissions and Compliance and the National Manager, Student Accommodation. The Pro Vice-Chancellor (Global) is responsible for the final assessment and approval of providers recommended by the committee.

(13) The Committee will seek Expressions of Interest from relevant providers in accordance with the Procurement Policy including probity checks.

(14) When selecting University approved service providers the matters considered by the Committee will include, but not be limited to:

a. all adults involved in the provision of welfare and accommodation services must hold current working with children clearances;
b. fees and charges:
    i. cancellation policy;
    ii. availability of staff contacts;
    iii. published policies and procedures and information available on the internet;
    iv. evidence of ongoing student support;
    v. insurance;
    vi. critical incident management; and
c. additionally for accommodation providers:
    i. facilities and transport access;
    ii. curfew management;

iii. gender segregation where applicable.

# Section 5 - Monitoring Welfare, Support and Accommodation Arrangements

(15) Prior to the University's Orientation the International Student Advisor must ensure that international students under 18 years of age have received all information relating to the University's orientation, enrolment, pre-departure, arrival details (including flight details), airport pick-up, accommodation and welfare arrangements.

(16) Prior to the University's Orientation the Senior International Student Advisor must ensure that the welfare and accommodation service providers have received all information relating to the University's orientation, enrolments, pre-departure and procedures to deal with events and incidents in accordance with the Critical Incident Management Policy.

(17) In accordance with the Privacy Policy and associated procedures, upon arrival the International Student Advisor will reconfirm and record the student's current residential address, mobile number (if any) and e-mail address (if any), who to contact in emergency situations, the contact details of the student's parent(s), legal custodian or any adult responsible for the student's welfare. The International Student Advisor will also ensure the student is given information on who to contact in emergency situations, including contact numbers of a nominated staff member and accommodation and welfare service providers; and how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical or other abuse.

(18) The International Student Advisor must set up monthly appointments with the student on campus to check on their welfare and accommodation arrangements until the student turns 18 or ceases to be a student of the University. The International Student Advisor must also regularly monitor the services provided by accommodation and welfare service providers until the student turns 18 or ceases to be a student of the University in accordance with Section 5 of this Procedure.

(19) The International Student Advisor must record any change in the student's contact details, attempt to resolve and report issues to the relevant staff of the University as well as relevant welfare and accommodation service providers immediately upon being notified.

(20) All notes from appointments, incidents and communications with parent(s) or legal guardian(s) related to Section 6, clauses (18) and (19) of this Procedure must be recorded and kept in the student's file.

(21) If the International Student Advisor is unable to contact the student and has concerns for the student's welfare, the matter must be escalated to the Senior International Student Advisor who will take all reasonable efforts to locate the student.

(22) Where an international student under 18 years of age cannot be located and there are concerns for the student's welfare, the Senior International Student Advisor must ensure that, in addition to internal escalation and actions undertaken in accordance with the Critical Incident Management Policy, notification is made to police and/or other relevant Commonwealth, state or territory agencies, as appropriate to the circumstances. Any such notifications, including the agency notified, date, time and outcome, must be documented and retained in the student's file.

(23) The Senior International Student Advisor or the International Student Advisor must notify the National Security Centre immediately upon being notified of incidents in accordance with the Critical Incident Management Policy.

(24) Variations in Confirmation of Enrolment (CoE), including suspension or cancellation of enrolment, must be processed in accordance with the University's policies and procedures and submitted to the International Student Advisor for review and to the Senior International Student Advisor for approval. The University will continue to approve

the student's welfare arrangements until one of the circumstances outlined below has occurred:

a. the student has alternative welfare, support and accommodation arrangements approved by another registered education provider;
b. care of the student by a parent, legal guardian or nominated relative is approved by the relevant Australian Government Department;
c. the student leaves Australia; or
d. the University has notified the relevant Australian Government Department that it is no longer able to approve the student's welfare arrangement and that it has taken the required action after not being able to contact the student. This will occur after further investigation of the event in accordance with clause (22) of this Procedure.

(25) Where the University is no longer able to approve a student's welfare, support or accommodation arrangements, the International Student Advisor or Senior International Student Advisor must take all reasonable steps to immediately notify the student's parent(s) or legal guardian of the change in welfare arrangements. All attempts to notify the parent(s) or legal guardian, including the method of contact, date, time, and outcome, must be clearly documented and retained in the student's file in accordance with University record-keeping.

# Section 6 - Monitoring the Suitability of Welfare and Accommodation Service Providers

(26) The University will monitor the suitability of a students' accommodation, support and welfare arrangements by verifying that:

a. the welfare and accommodation service providers have provided a current and accurate staff directory to the student, including an emergency point of contact which must be available 24 hours a day, seven days a week;
b. the welfare and accommodation service providers have demonstrated that any staff who will interact directly with the student comply with Working with Children or Vulnerable People Check (WWC/V Check) requirements in accordance with the Safeguarding Children, Young People and Adults at Risk Policy;
c. the student's accommodation arranged by the accommodation service provider is within 45 minutes travel time from the campus they are required to attend;
d. the welfare and accommodation service providers record every interaction with the student in their own data-base and that access to those records are available to the University staff for verification anytime, that every record saved in the data-base is appropriately stored, secured and backed up, made available to the University staff for future reference if required, and that this information can be provided to the University as a comprehensive report listing the dates each interaction took place;
e. the accommodation service provider has had regular communication with the student's parent or legal custodian at least once every month, and with the welfare service provider at least once every two months;
f. the welfare service provider has had regular communication with the student's parent or legal custodian at least once every month, and with the accommodation service provider at least once every two months;
g. the accommodation service provider allows a representative of the welfare service provider access to the premises where the student resides as required during standard working hours;
h. that detailed information on critical incidents have been provided by the welfare and/or accommodation service provider(s) and that the University procedures have been followed appropriately;
i. the accommodation service provider has provided evidence to the University that it has conducted a physical inspection to assure the accommodation is appropriate for the student's age and needs at least six months prior to the student's arrival and at least six months thereafter. The University must also join the inspection performed by the accommodation service provider or arrange their own inspection at an alternate time;

j. the welfare service provider has produced evidence that it has:
    i. personally met the student and inspected the accommodation arranged for the student within 48 hours of their arrival;
    ii. personally met the student at least once every fourteen day cycle after the student's arrival;
    iii. contacted the student by phone every week, unless meetings in person are scheduled on that particular week;
    iv. personally met the student at premises where the student resides within every six months cycle after the student's arrival. The welfare service provider must have consent from the student and the accommodation service provider prior to visiting the student.
k. the accommodation service provider has arranged suitable accommodation for the student in a segregated area divided by gender;
l. the student is satisfied with the welfare and accommodation arrangements and that both providers have taken all reasonable steps to address the student's concerns if any.

(27) The University will monitor the suitability of accommodation providers by conducting a review every six months taking in consideration the matters included in Section 5 and Section 7, of this Procedure

(28) For the purposes of Section 7 of this Procedure, University refers to a staff member of Global appointed from time to time to discharge responsibilities including (but not limited to) issuing Confirmation of Enrolments (CoE) and/or monitoring service providers, inspecting accommodation premises and liaising directly with students.

# Section 7 - Additional Requirements Applicable to Welfare and Accommodation Service Providers

(29) Welfare and accommodation service providers must advertise and comply with their policies and procedures. Policies and procedures must include:

a. fee structure and process for refunds;
b. list of support staff and their responsibilities;
c. accommodation service providers must also advertise:
    i. rules students must follow during their stay;
    ii. process to handle complaints and escalation;
    iii. provisions to arrange alternative rooms if required.

(30) Welfare service providers must provide a copy of binding agreements between the student and the welfare service provider to the student and the University as soon as practicable.

(31) Accommodation service providers must provide a copy of binding agreements between the student and the accommodation service provider to the student and the University as soon as practicable.

(32) Accommodation service providers must confirm student's placements in writing to the student and the University at least two weeks prior to the course proposed date as stated on the student's letter of offer.

# Section 8 - Associated Information

(33) For related legislation, policies, procedures and guidelines and any supporting resources please refer to the Associated Information tab.

## Status and Details

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| **Status** | Current |
| **Effective Date** | 14th September 2026 |
| **Review Date** | 14th September 2029 |
| **Approval Authority** | Governance Officer |
| **Approval Date** | 14th September 2026 |
| **Expiry Date** | Not Applicable |
| **Responsible Executive** | Richard Dobek<br>Pro Vice-Chancellor (Global) |
| **Responsible Manager** | Ben Griffin<br>Associate Director, International Admissions and Compliance |
| **Enquiries Contact** | Ben Griffin<br>Associate Director, International Admissions and Compliance<br>---<br>Global and Education Pathways |