

YOUNGER STUDENTS PROCEDURE

Approving authority	Executive Management Team (EMT)
Purpose	This procedure has been designed to ensure that when enrolling overseas students under the age of 18 years, the Institute meets the relevant Commonwealth, state or territory legislation or other regulatory requirements relating to child welfare and protection appropriate to the jurisdiction in which the Institute operates.
Responsible Officer	Academic Dean and Head of Marketing and Student Experience
Next scheduled review	September 2026
Document Location	http://www.ozford.edu.au/higher-education/policies-and-procedures/
Associated documents	<p>Younger Student Policy</p> <p>Academic Staff Professional Development Policy and Procedure</p> <p>Admissions Policy and Procedure</p> <p>Child Safe Risk Management Policy and Procedure</p> <p>Child Safety Policy and Procedure</p> <p>Critical Incident Policy and Procedure</p> <p>Deferring, Suspending or Cancelling a Student's Enrolment Policy and Procedure</p> <p>Human Resources Policy and Procedure (Manual)</p> <p>Professional Staff Professional Development Policy and Procedure</p> <p>Records Management Policy and Procedure</p> <p>Student Code of Conduct Policy and Procedure</p> <p>Student Support and Services Policy and Procedure</p> <p>Transfer between Registered Providers Policy and Procedure</p>

1. PRINCIPLES

When the Ozford Institute of Higher Education (hereafter referred to as the "Institute") enrolls overseas students under the age of 18 (younger students), the Institute must meet certain obligations including:

- meet Commonwealth, state or territory legal requirements relating to child welfare and protection which is Victorian Child Safe Standards; and,
- give younger overseas students important age and culturally appropriate safety information, including what to do and who to contact in an emergency, and how to report any incident or allegation of sexual, physical or other abuse,
- assess, assign and monitor accommodation and welfare arrangement for under 18 international students when accepting the responsibility by signing the Confirmation of Appropriate Accommodation and Welfare (CAAW) letters.

As a student visa condition, if an overseas student is under the age of 18, the student's welfare must be maintained for the duration of their stay in Australia. To maintain welfare, overseas students can either:

- 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 accommodation, support and general welfare arrangements that have been approved by the overseas student's registered provider. In this case, the registered provider will issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter.

The ***Younger Student Policy and Procedure*** outlines the Institute's commitment to supporting underage students and the conditions under which the Institute will accept responsibility for approving the CAAW arrangements, and the succeeding monitoring and reporting processes associated with the arrangements.

2. SCOPE

This procedure applies to:

- All staff, contractors, carers and other persons involved in the provision of accommodation and support services to younger students.
- Younger students;
- Students that are living in a homestay arrangement with a younger student and are over the age of 18 years.

3. DEFINITIONS

Confirmation of Enrolment (CoE)

The Confirmation of Enrolment (also called a CoE) is an official statement from the Institute via PRISMS that lists the student's details, course and the start and end dates of the course.

The Confirmation of Enrolment (COE) is an official document issued to international students by universities and other education providers in Australia. It confirms that the student has accepted a place in a course and has paid required tuition fees and Overseas Student Health Cover (OSHC). The COE is required by the Department of Home Affairs for the purpose of issuing a student visa.

Confirmation of Appropriate Accommodation and Welfare (CAAW)

A Confirmation of Appropriate Accommodation and Welfare (CAAW) is issued via PRISMS to confirm that appropriate arrangements have been made for the student's accommodation, support and general welfare. The period nominated must be at least the length of the student's Confirmation of Enrolment (CoE) plus 7 days at the end of the CoE or until the student turns 18.

Compassionate or Compelling Circumstances

Compassionate or compelling circumstances are generally those beyond the control of the student and which have an impact upon the student's course progress or wellbeing. These could include, but are not limited to:

- serious illness or injury where a medical certificate states that the student is unable to attend class;
- bereavement for the death of close family members such as parents or grandparents (documented evidence must be provided);
- serious illness, accident or family incident which requires immediate travel which has impacted the student to studies;
- the inability to begin study on the course commencement date stated on the CoE due to delay in receiving a student visa if relevant;
- major political upheaval or natural disaster in the home country requiring their immediate travel and this has impacted on the student's studies;
- a traumatic experience supported by police or psychologist's reports which could include but is not limited to:
 - involvement in or witnessing of an accident; or
 - a crime committed against the student; or

- the student being a witness to a crime, and this has impacted on the student.
- where the Institute was unable to offer a pre-requisite unit.

Notes:

- *misreading the examination timetable, examination anxiety or returning home will not be accepted as Compassionate and Compelling circumstances;*
- *religious or faith-based issues are not in themselves grounds for special consideration. However, they may be used in support of an application that meets the Compassionate and Compelling circumstances set out above.*

Critical Incident

A critical incident is defined as ‘a traumatic event, or the threat of such (within or outside Australia), which causes extreme stress, fear or injury’. It includes but is not limited to incidents that may cause physical or psychological harm. Non-life threatening events can be classed as critical incidents.

Critical incidents are not limited to, but could include:

- Critical illness/serious injuries/medical emergencies involving a student or staff;
- unexpected Student/staff death;
- missing students;
- termination of welfare arrangement where the Institute can no longer take responsibility for the overseas underage student due to student refusing their approved accommodation or leaving their accommodation without notice, even after the Institute has exhausted all possible avenues of assisting the student to maintain appropriate arrangement;
- severe oral, written or psychological aggression;
- Traumatic events/threat/allegation that affect students;
 - Sexual assault
 - Physical and/or sexual abuse
 - Domestic violence
 - A child safe incident
 - Mental Health Crisis
 - Drug/alcohol abuse
 - A child safe incident
- natural disaster
- riot; fire/explosion with injuries or significant damage on campus;
- campus disturbance / riot

Homestay hosts

Provide homestay accommodation to younger students as set out in the ***Younger Students Policy and Procedure***.

Homestay service

A homestay service that assists the Institute to source suitable homestay accommodation as set out in the ***Younger Students Policy and Procedure***.

ISA Membership

International Student Alliance (ISA) provides student advocates that support younger students to ensure that they have a positive experience. The student advocates are multilingual, act as additional support providing updates in the parent’s/legal guardian’s native language.

Nominated Guardian

A nominated guardian' is approved by the Department of Home Affairs. A parent, legal custodian or eligible relative can apply to be a 'nominated guardian' by lodging an application to the Department of Home Affairs. The Department of Affairs will assess the nominated arrangements according to the *Migration Regulations 1994*. The Institute is not involved and will not issue a CAAW letter under such arrangement.

Off-Campus Students

Students who are studying online or externally.

Younger student

A younger student is a student who is under 18 years of age.

Provider Registration and International Student Management System (PRISMS)

Means the Provider Registration and International Students Management System (the electronic system that holds CRICOS and the electronic confirmation of enrolment).

4. PROCEDURE

4.1 All younger students and their parent(s)/legal guardian(s) are made aware of the policies and procedures of the Institute, by the following means:

- on the Institute website;
- within the student acceptance agreement;
- in the Student Handbook;
- at orientation or induction;
- by publication, from time to time, of bulletins and notices;
- within the information provided by Marketing and Student Experience staff

Admission and Enrolment

4.2 The Institute's ***Admissions Policy and Procedure*** details the criteria for admission.

4.3 Applicants are expected to be a minimum of 18 years of age prior to commencing a course at the Institute.

4.4 Applicants who will be aged 17 years upon commencement may apply for consideration on a case-by-case basis providing evidence that the younger student will satisfy the following ***Younger Student Policy*** requirements:

- Select a satisfactory welfare arrangement:
 - stay in Australia with a 'nominated guardian' approved by the Department of Home Affairs, who can be the overseas student's parent or person who has legal custody (Option 1); or
 - stay in Australia with a 'nominated guardian' approved by the Department of Home Affairs, who can be an eligible relative who is aged over 21 and is of good character (Option 2); or
 - stay in Australia in accommodation, support and general welfare arrangements that have been approved by the Institute. (Option 3).
- provide evidence of an ISA Membership which provides for the engagement of a student advocate. The student's parents or legal guardian must arrange for the ISA membership and

provide the Institute with confirmation of engagement of a student advocate before a COE will be issued.

- 4.5 The Academic Dean will assess and approve all younger student admission applications.
- 4.6 If the Applicant nominates Option 3, the Acceptance Agreement will include the condition that the younger student, upon arrival in Australia, will reside and remain in Institute's approved accommodation and not move out without approval until the age of 18.

Confirmation of Appropriate Accommodation and Welfare (CAAW)

- 4.7 For Option 3 younger students, the Marketing staff will
- Create the CoE and the CAAW letter via PRISMS. The CAAW letter is signed by the Head of Marketing and Student Experience under a delegation from the President and CEO.
 - Nominate the dates for which the Institute accepts responsibility for approving the younger student's accommodation, support and general welfare arrangements, i.e. the period of the CoE plus 7 days before and after the CoE date.
- 4.8 It is expected that the younger student will not travel to Australia until the CAAW commences. If the younger student wants to travel to Australia prior to that date, the younger student should travel with their parent/legal guardian or must apply in writing for the Institute to extend its approved care arrangements to cover the overseas student from the date of their arrival. The application will need to be supported by evidence of compassionate or compelling grounds.
- 4.9 The Head of Marketing and Student Experience will assess and approve any requests for extensions of CAAW.

Selection of third parties to organise and assess welfare and accommodation arrangements

- 4.10 The Head of Marketing and Student Experience will assess and approve third parties engaged to organise and assess welfare and accommodation arrangements, ie. Homestay services and student advocate services (ISA memberships).
- 4.11 The Institute will source suitable third parties to provide access to, and assist staff to organise and assess welfare and accommodation arrangements for younger students that satisfy the following criteria:
- The organisation will have appropriate experience and knowledge of the welfare and accommodation needs of younger students and the requirements of the ESOS Act, National Code of Practice 2018 and the Victorian Child Safe Standards.
 - The organisation will have the capacity to source suitable welfare and accommodation arrangements for younger students as and when required.
 - The organisation will have available suitable homestay arrangements that may be used as emergency accommodation if a younger student needs to be moved at short notice.
 - The organisation will have capacity to respond quickly to a critical incident including an appropriate critical incident policy and procedures including immediate notification to the Institute of the incident.
 - The organisation will be child safe screened including that all staff that may potentially interact with international students will be subject to the following:
 - working with Children Check status, or similar check;

- proof of personal identity and any professional or other qualifications;
 - the person's history of work involving children; and
 - references that address the person's suitability for the job and working with children
- All staff will receive training in the Institute's child safe practices and in reporting obligations as set out in the *Child Safety Policy and Procedure*.

4.12 Homestay services must:

- Check the location of the homestay (needs to be close to public transport)
- Conduct an interview to assess the suitability of the homestay host and satisfy the child safety requirements. This includes the ability to adequately respond to examples of situations that can arise whilst caring for a younger student.
- Visit homestay hosts to inspect the premises to confirm suitability as part of the initial selection process.
- Screen the homestay host family for suitability for child connected work including obtaining and verifying a current Working with Children Check clearance (WWCC) for all persons over 18 years of age including any students residing at the homestay.
- Carefully evaluate responses and look for qualities that make good Homestay hosts: understanding, kindness, flexibility and generosity.
- Provide the Institute with a Homestay profile of the family, including evidence of child safe screening,
 - proof of personal identity and any professional or other qualifications;
 - the person's history of work involving children; and
 - references that address the person's suitability for the job and working with children
- Provide an induction into the Institute's child safe policies and procedures.
- Provide evidence that at least annually, the supplier provides appropriate guidance and training to the Homestay.

4.13 While the Institute will expect the Homestay services to supply verified homestay hosts. The Institute **does not delegate** its responsibility to screen and monitor homestay hosts.

4.14 The College will monitor the third parties to confirm that all staff are suitable for child connected work.

4.15 The quality of the Homestay services will be measured on:

- The number of homestay hosts rejected prior to acceptance.
- The retention of students in the homestay
- Feedback from the younger students and their parents/legal guardians.
- Any critical incidents or serious issues that arise in respect to the homestay arrangements and the suitability of the response to these issues.
- Outcomes from homestay provider inspections carried out for each Homestay provider

4.16 The quality of student advocate services will be measured on:

- Feedback from the younger students and their parents/legal guardians.
- Any critical incidents or serious issues that arise and the suitability of the response to these issues.

- 4.17 If the third-party agreement is terminated by either party, existing Homestay and student advocate arrangements will remain in place for the planned duration providing the homestay host or student advocate continues to meet their commitments and the younger student and the student's parents/legal guardians are satisfied with the arrangement.

Homestay Accommodation Selection Process

- 4.18 The Institute will select, inspect, assess and only approve and assign to the student accommodation that is safe, appropriate and adequate to their needs.
- 4.19 During the accommodation selection process, the Institute (or the homestay service) will:
- conduct an initial physical site visit to confirm that the accommodation has suitable facilities including a bedroom for the student's sole use that is age appropriate.
 - A welcoming household and safe environment – it is expected that the Homestay host will be welcoming and supportive of the visiting student
 - An individual room with bed, bedding, wardrobe, desk, desk lamp, and a place for books;
 - Supply two meals per day including a prepared dinner each night. It is expected that meals are taken with the student as a family unit) and access to fresh and adequate food for the student to independently make breakfast;
 - A key to the host's premises
 - Provide electricity, gas and water except internet and phone calls (which may be supplied by arrangement);
 - Provide effective heating and cooling in the room;
 - Supply access to laundry facilities for students washing including machine, laundry detergent, iron and space for students to dry their clothes;
 - Provide a smoke free environment;
 - Provide a safe environment;
 - Provide support to make sure the student is confident using public transport so that they can easily get to and from school;
 - Respect the privacy of the student;
 - Provide care and support in the event of illness;
 - confirm that all adults (persons over 18 years of age) living in any homestay are suitable for child connected work. through:
 - interview to confirm suitability as a homestay provider and for child connected work;
 - referee checking to confirm suitability as a homestay provider and for child connected work;
 - ensure all persons over 18 years of age living in the household (including students) have valid WWCC. The WWCC should be verified using the Working for Children Victoria verification check.
 - confirm through review of personal identification that the key homestay host is over the age of 21 years and that the personal identification for all persons over the age of 18 is consistent with other documentation submitted.
- 4.20 All adults in approved accommodation must provide the Institute with their contact details and appoint an adult as the Key Contact of the Household.

- 4.21 To ensure younger students are safe and suitable welfare is maintained at all times, the Key Contacts of approved accommodations must agree to inform the Institute as soon as they are made aware that:
- The younger student does not return home overnight without approval from the Institute.
 - The younger student moves out without approval from the Institute.
 - They are unable to provide accommodation for the younger student.
 - There are changes in the accommodation or household composition such as any additional adults moving into the accommodation. Any such persons must receive a briefing on their obligations and provide the Institute with valid WWCC.
- 4.22 The Institute will provide information about the Institute's ***Younger Student Policy and Procedure***, the homestay provider's obligations under the ESOS framework and in respect to child safety on appointment and during each site visit.

Additional Support for Younger Students

- 4.23 Upon admission, the Institute will provide all younger students with an age and culturally orientation and support including information as set out in the ***Student Support and Services Policy and Procedure*** on:
- safety on campus and while living in Australia,
 - Child safety awareness,
 - younger student visa requirements on appropriate welfare and accommodation arrangement,
 - who to contact in emergency situations, including contact numbers of nominated staff members or service providers; and
 - how to seek assistance and report any child safe incidents including any involving sexual, physical or other abuse
- 4.24 For younger students living in homestay arrangements, the younger student will be informed as part of Orientation that they can approach the Student Experience staff at any time if they encounter any issue with the homestay. This is to ensure that the student has settled and there are no issues for both the younger student and the homestay.
- 4.25 The Institute will maintain up-to-date records of the younger student's contact details will be maintained in the Institute's student management system and in PRISMS including:
- the contact details of the student's parent(s), legal guardian
 - the contact details of any adult responsible for the student's welfare ie. The nominated guardian
 - For younger student's under CAAW, the contact details of the homestay provider and ISA student advocate.

Ongoing Monitoring and Review of Arrangement

- 4.26 The Institute is committed to regularly monitor, verify and review the appropriateness and adequacy of the accommodation arrangement and welfare support provided to underage students, at least every 6 months after the accommodation being approved. This will include verification of WWCC details for all persons over the age of 18 years in the household.

- 4.27 Students will be encouraged to see the Student Experience staff if they have any concern or issues with the arrangement. Follow up meetings and interviews will be organised by the Student Experience staff and documented in the student management system.
- 4.28 The monitoring and verification process involves one or more of the following:
- a physical site visit;
 - a student interview;
 - a student survey;
 - any other ways of confirming that the accommodation still meets the overseas student's needs.
- 4.29 Inspections to the accommodation will take place if there are concerns raised about the student welfare by the younger student, other students, parents/legal guardian or Institute staff or third parties who have direct interaction with the students.
- 4.30 As part of the site visits, the staff conducting the visits will provide child safety training as required by the ***Child Safety Policy and Procedure***.
- 4.31 If the homestay is found unsuitable for the student, the homestay service will be asked to provide another homestay host.

Change of Student Enrolment

- 4.32 Younger students are required to notify the Institute within 7 days if there are any changes to:
- The students current address, mobile number or email address
 - Emergency contact details
 - Parent/legal guardian (or any adult responsible for the student's welfare) contact details
- 4.33 The Institute will take all practical steps to ensure welfare is maintained at all times, regardless of the overseas student's study circumstances.
- 4.34 If a younger student requests a transfer to the Institute from another provider or requests a transfer from the Institute to another provider, the Institute must ensure there is no gap in welfare arrangements. The ***Transfer between Registered Providers Policy and Procedure*** sets out the transfer process. The accepting registered provider is responsible for ensuring there is no gap in welfare arrangements. The Institute will cancel the student's CAAW 7 days after enrolment end date.
- 4.35 If the student is undertaking a package of courses within the Institute, the Institute will maintain the CAAW during any gap period between courses.
- 4.36 Where the Institute suspends or cancels the enrolment of an overseas student on a CAAW, the Institute must continue to check the suitability of care arrangements 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 Institute 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 Institute has taken the required action under Standard 5.5 after not being able to contact the overseas student; or
- the overseas student turns 18.

Disruption and Cancellation of Welfare Arrangement

- 4.37 The Institute will activate its ***Critical Incident Policy and Procedure*** in any emergency situations which disrupts welfare arrangements.
- 4.38 The Institute will notify the police and any other relevant agencies as soon as practicable if staff are unable to contact a younger student and there are concerns for the student's welfare.
- 4.39 The Institute will make all reasonable efforts to inform the student's parents or legal guardian.
- 4.40 If a younger student is found to be not living in approved homestay accommodation, the ***Student Code of Conduct Policy and Procedure*** will be followed. The following actions may be taken:
- the student will be asked to immediately move into a homestay arrangement approved by the Institute. If this involves a move from a parent arranged to a Institute arranged homestay, the homestay placement fees will apply.
 - if the student refuses to move to the approved homestay arrangement, a letter of intention to report for non-approval of welfare and living arrangement (see below) will be sent to the student and the parents will be informed. The student will be requested to meet with the Student Experience staff.
 - In the meeting, the student will be reminded of their visa obligations and the student will be requested to make a payment of the homestay placement fee to enable the Institute to organise a homestay for the student.
 - if the student still refuses to live in suitable accommodation and/or payment is not received within 1 week, the Institute will commence the cancellation process as set out in the ***Deferral, Suspension and Cancellation of Student Enrolment Policy and Procedure***.
 - The Institute will inform Department of Home Affairs via PRISMS of the student default of the Visa conditions and that the Institute is no longer able to take CAAW responsibility for the student's welfare. The CAAW letter will be cancelled.
- 4.41 The Institute will make contact with the Department of Home Affairs and other local agencies if it becomes aware the any overseas student is not being adequately looked after by his/her **'nominated guardian'**. Where the student is at risk of or subject to child abuse, the Institute's ***Child Safety Policy and Procedure*** will be followed.
- 4.42 The Institute's responsibility for welfare arrangements can only be terminated in the following circumstances:
- The younger student will be cared for by a parent or nominated relative approved by Immigration and a Confirmation of Appropriate Accommodation and Welfare (CAAW) is no longer required;
 - The younger student returns to their home country,

- The Institute can no longer take CAAW responsibility for the overseas student due to:
 - the younger student refuses to live in the approved homestay accommodation or leaves the approved homestay accommodation without notice and the Institute has exhausted all possible avenues of assisting the overseas student to maintain appropriate homestay arrangements;
 - the homestay accommodation provider is unable to maintain arrangements and alternative homestay accommodation cannot be sourced;
 - the younger student's enrolment is suspended or cancelled as set out in the *Deferring, Suspending or Cancelling a Student's Enrolment Policy and Procedure*;
 - the younger student goes missing from their accommodation and cannot be found or contacted, even after the Institute has implemented the *Critical Incident Policy and Procedure*.

- 4.43 Except in the circumstance set out above where the Institute can no longer approved the CAAW arrangement, the Institute must ensure be confirmed that there is no welfare gap with the new welfare arrangements are formally in place before terminating the CAAW.
- 4.44 In the above situations, the Institute will report the overseas student within **24 hours** using the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter through PRISMS. This report should be 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.

Staff Obligations

- 4.45 The provision of younger student support is a joint responsibility of the Marketing and Student Experience staff and the Academic staff.
- 4.46 All staff who interact directly with overseas students must be made aware of the Institute's obligations under the ESOS framework, the Victorian Child Safe Standards and the potential implications for overseas students arising from these obligations as set out in the:
- *Academic Staff Professional Development Policy and Procedure*
 - *Professional Staff Professional Development Policy and Procedure*
- 4.47 Staff must inform the Head of Marketing and Student Experience on the same day if any younger student is missing from class or advises that they are no longer in an approved homestay arrangement.
- 4.48 All staff must maintain younger student records as set out in the *Records Management Policy and Procedure*.

5. QUALITY ASSURANCE

To ensure that this procedure is fit for purpose and meets the requirements of the HES Threshold Standards the procedure will be;

- 5.1 internally endorsed by the Executive Management Team on development or review, prior to approval by Governing Board, or the Academic Board or other delegated authority;

- 5.2 externally reviewed as part of any independent review of the HES Threshold Standards approved by the Governing Board;
- 5.3 internally reviewed by the Responsible Officers every three years from the date of approval (if not earlier).
- 5.4 referenced to the applicable HES threshold Standard and/or other legislation/regulations.

6. FEEDBACK

Feedback or comments on this procedure is welcomed by the listed Responsible officers of the Institute.

7. ACKNOWLEDGEMENT

This procedure was developed with reference to the following:

- Deakin University, Underage Student Management Policy, 2023 ([Underage Student Management policy / Document / Deakin Policy Library](#))
- University of NSW, International Students Under the Age of 18 years – Welfare, Support & Accommodation Arrangements Procedure, 2020 ([International Students Under the Age of 18 years – Welfare, Support & Accommodation Arrangements Procedure \(unsw.edu.au\)](#))
- Victoria University, Safety and Welfare of Children and Young People Procedure, 2021 ([Safety and Welfare of Children and Young People Procedure / Document / Victoria University Policy Library \(vu.edu.au\)](#))
- Ozford College, Younger Student Policy and Procedures, (see Ozford website)
- Australian Government Department of Education, Standard 5: Younger Overseas Students (Education Fact Sheet Title ([internationaleducation.gov.au](#)))

8. VERSION CONTROL

Version	Date approved	Description	Approved by
1.0	September 2018	Initial issue	EMT
1.1	December 2020	Internal Review	EMT
2.0	June 2023	Internal Review	EMT
2.1	September 2023	Internal review – minor formatting changes, alignment of definitions and add external referencing	EMT
Related legislation/ regulation/standard	Tertiary Education Quality and Standards Act 2011 Education Services for Overseas Students Act (ESOS) 2000 Education Services for Overseas Students Regulations 2019 The National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standards 5, 6, 7 and 9 Higher Education Standards Framework (Threshold Standards) 2021 Child Wellbeing and Safety Act 2005 Children, Youth and Families Act 2005 Child Safe Standards 2022 (Vic)		

Note: EMT = Executive Management Team