

## YOUNGER STUDENTS & HOMESTAY POLICY AND PROCEDURE

<b>Approving authority</b>	Executive Management Team
<b>Purpose</b>	This policy and procedure has been developed to meet the ESOS National Code Standard 5: Younger Overseas Students
<b>Responsible Officer</b>	Head of Student Services
<b>Associated documents</b>	<ul style="list-style-type: none"> <li>• Child Safety Policy and Procedures</li> <li>• Child Safe Risk Management Policy and Procedures</li> <li>• Younger Students Policy and Procedures</li> <li>• Mandatory Reporting Policy</li> <li>• Responding to and reporting allegations of suspected child abuse policy and procedures</li> <li>• Student Support &amp; Services Policy &amp; Procedures</li> <li>• Homestay Policy and Procedures</li> <li>• Human Resources Policy</li> <li>• Critical Incident Policy and Procedures</li> </ul>

### 1. Rationale

This policy has been developed to meet the requirements of the National Code 2018 Standard 5, where students under the age of 18 are not being cared for in Australia by a parent or suitable nominated relative; Ozford College must ensure the arrangement made to protect the personal safety and social well-being of those students are appropriate. This policy also addresses the Victorian Child Safe Standards and Ministerial Order 870 – Child Safe Standards - Managing the risk of child abuse in schools.

Ozford takes its duty of care responsibilities very seriously and therefore needs to ensure that the proposed arrangements for the accommodation, support and welfare of those students under 18 years of age are safe and suitable.

### 2. Scope

This policy applies to any Ozford international students who are aged under 18 years where Ozford has taken on the responsibility under the Migration Regulations for approving the accommodation, support and general welfare arrangements.

By default, the nominated date for which Ozford accepts responsibility for approving the student's accommodation, support and general welfare arrangements is for the period of the Confirmation of Enrolment (CoE) plus 7 days before and after the CoE date.

Under National Code Part B Standard 5, all registered providers enrolling overseas students under 18 must meet the relevant Commonwealth, state or territory legislation or other regulatory requirements relating to child welfare and protection appropriate to the jurisdiction in which the provider operates. This is irrespective of whether the provider is taking responsibility for the welfare arrangements or the Department of Home Affairs has approved a nominated guardian.

### 3. Policy

3.1 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 as a student visa condition. Students will be provided with options before enrolment at Ozford that include:

- Ozford takes no CAAW responsibility. The student will 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 who has a visa to stay in Australia for the duration of the student visa or until the student turns 18; **or**

- Ozford takes CAAW responsibility – The student will be required to accept the accommodation, support and general welfare arrangements that have been approved by Ozford. In this case, Ozford will issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter for welfare responsibility until students are 18 years of age.
- 3.2 Ozford will only provide CAAW arrangements to students who are 13 years of age or older at the time of commencement of their studies with Ozford or arrival in Australia prior to commencement of studies if that is earlier than the commencement date. This is because students under the age of 13 years of age cannot reside in a homestay.
- 3.3 Ozford will take all reasonable enquiries and be satisfied that the student will be at least 13 years of age before:
- entering an agreement or arrangement for the provision of homestay accommodation to an international student; or
  - issuing a Confirmation of Appropriate Accommodation Welfare (CAAW) form to the Department of Home Affairs in circumstances where homestay accommodation will be provided to an international student.
- 3.4 The Head of Student Services has responsibility for deciding whether or not Ozford will take CAAW responsibility for the student. The Head of Student Services has been delegated this role by the PEO and the Executive Management team (EMT).
- 3.5 Where Ozford has issued a CAAW letter accepting the responsibility for approving the accommodation, support and general welfare arrangements for a student who is under the age of 18, Ozford will not delegate, outsource or contract out that responsibility.
- 3.6 When Ozford has issued a CAAW letter to enable student enrolment, Ozford will ensure that:
- a. The overseas student is in living arrangements which are safe and adequately meet their needs;
  - b. All arrangements to provide or approve appropriate accommodation, support and general welfare for the student, including any service provision by third parties, meet Child Safe standards;
  - c. The CAAW responsibilities are not delegated, outsourced or contracted out.
  - d. Support staff supporting receive training in Child Safe standards, Ozford' policies and procedures for managing emergency situations and critical incidents, the ESOS Act, the National Code and VRQA Guidelines for the Enrolment of Overseas Students Aged Under 18 years issued from time to time
  - e. Homestay hosts must meet the homestay selection suitability check
  - f. Students are provided with a an Induction and Student Safety Card
- 3.7 Ozford will take all practical steps to ensure welfare is maintained at all times, regardless of the overseas student's study circumstances.
- 3.8 Ozford will ensure that any adults involved in providing overseas student accommodation or welfare arrangements are suitable for child connected work and have Working with Children Checks (WWCC).
- 3.9 Ozford will screen and check the suitability of homestay arrangement by site visit prior to placement, and at least every six months that the overseas student accommodation is appropriate to the student's age and physical needs.
- 3.10 Ozford will provide homestay with appropriate information regarding their responsibilities and Ozford emergency contact and student's parents contact details.
- 3.11 Students who are under 18 years of age will be informed that are not allowed to move out of a homestay arrangement without consent from Ozford. Ozford will update PRISMS if students move out without consent.

- 3.12 Ozford will provide younger overseas students 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.
- 3.13 Ozford will provide each student with a Student Safety card which will include the homestay accommodation provider's address, home telephone number and mobile numbers and emergency contact details, including 24/7 contact details for Ozford College international student coordinator and general emergency contact information, and a statement that "Ozford College is regulated by the Victorian Registration and Qualifications Authority (VRQA). Students can contact VRQA at [www.vrqa.vic.gov.au](http://www.vrqa.vic.gov.au)".
- 3.14 Ozford will notify the police and any other relevant agencies as soon as practicable if unable to contact an overseas student and there are concerns for the overseas student's welfare
- 3.15 Ozford will report through Provider Registration and International Student Management System (PRISMS) if Ozford is no longer able to take responsibility for the overseas student's welfare
- 3.16 Ozford will make all efforts to contact a younger overseas student's parent or legal custodian immediately if they can no longer approve the overseas student's welfare.

#### **4. Procedures– Approving and Cancelling/Ending Welfare Arrangement**

- 4.1 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 as a student visa condition. To maintain welfare, Ozford will check with students' parents during enrolment if student will:
- 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 who has a visa to stay in Australia for the duration of your student visa or until the student turns 18; **or**
  - stay in accommodation, support and general welfare arrangements that have been approved by Ozford College. In this case, Ozford College will issue a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter.
- 4.2 If the parents would like Ozford to issue a CAAW letter, Ozford will provide parents with two options where CAAW can be approved:
- Option 1: Students' parents give permission for students to physically reside with a homestay organized by Ozford or
- Option 2: Students to physically reside with a carer nominated by the parents and approved by the Department of Home Affairs and Ozford.
- 4.3 For either Option 1 or 2, the Homestay Policy and Procedures must be implemented before a homestay arrangement can be approved.
- 4.4 The Head of Student Services has a delegation from the PEO and the Executive Management team to decide whether or not Ozford accepts CAAW responsibility for a student. Once the accommodation arrangement is approved, the Head of Student Services will confirm with the Department of Education and Training (DET) that appropriate arrangements are in place by completing a Confirmation of Appropriate Accommodation and Welfare declaration (CAAW), using the pro forma letter available through Provider Registration and International Students Management System (PRISMS), which is to be submitted by the student as part of the visa application; and advise in writing of the approval using the pro forma letter available through PRISMS.
- 4.5 For students with a student visa that covers multiple courses, Ozford will approve the welfare of students who are enrolled in the course offered by Ozford, as covered by the period of the Confirmation of Enrolment (CoE) plus 7 days before and after the CoE dates, using the pro forma letter available through PRISMS.

- 4.6 If Ozford suspends or cancels the enrolment of a student, Ozford must continue to check the suitability of the welfare arrangements for that student until:
- The student is accepted by another registered provider and that registered provider has approved alternative accommodation, support and general welfare arrangements for the student,
  - The student leaves Australia,
  - care of the student by a parent or nominated relative is approved by immigration, OR
  - Ozford has notified Immigration under Standard 5.3.6 that it is no longer able to approve the student's welfare arrangements or under Standard 5.5 that it has taken the required action after not being able to contact the student.
    - i. Ozford will report under Standard 5 unless students can provide evidence that:
      - A new CoE issued by the new registered provider confirming that it takes over responsibility for approving the student's accommodation, support and general welfare arrangements,
      - An airline ticket and letter from parents confirming student is leaving Australia permanently, OR
      - Any relevant documentation that proves that other suitable arrangements are made that satisfy the Migration Regulations
    - ii. If an under-18 student is found not living in an approved accommodation, actions below will be taken by Ozford:
      - the student will be required to immediately move into a homestay arrangement. Ozford will organise a Homestay using its outsourced homestay company.
      - if the student refuses to move to the approved homestay, 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.
      - after receiving the letter, the Student Welfare Officer will have another meeting with the student. The student will be requested to make a payment for the Homestay application fee as an agreement for Ozford to organise a Homestay for the student.
      - if payment is not received within 1 week, Ozford will inform the student in writing (please see below) that his/her living arrangement is not approved and advise the relevant Commonwealth department via PRISMS.
    - iii. Where a student is missing from their accommodation and cannot be contacted, Ozford will implement its Critical incident policy and inform the student's parents and place a missing person report with police and if the student does not contact the parents/Ozford within 5 working days Ozford will report under National Code Standard 5.3.6.2 that it can no longer approve of the arrangements for the student in such circumstances.

## **5. Procedures – Arranging Homestay**

### **Sourcing, Selecting, Checking and Verifying Suitability of Homestay Accommodation**

5.1 Ozford will source suitable outsourced homestay accommodation suppliers to provide access to, and monitor the suitability of Homestay hosts for Ozford international students that satisfy the following criteria:

- i. The organisation will have appropriate experience and knowledge of the accommodation needs of international students and the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 Part B Standard 5, the Victorian Child Safe Standards, Victorian Registration and Qualifications Authority Guidelines for the Enrolment of Overseas Students Aged Under 18 Years, the Victorian Child Safe Standards and Ministerial Order 870 – Child Safe Standards - Managing the risk of child abuse in schools with respect to how they apply to homestay providers.
- ii. The organisation will have capacity to source suitable homestay accommodation for Ozford's international students as and when required.

- iii. The organisation will have available suitable homestay arrangements that may be used as emergency accommodation if an international student needs to be moved at short notice.
- iv. The organisation will have capacity to respond quickly to a critical incident including an appropriate critical incident policy and procedures including immediate notification to Ozford of the incident.
- v. The organisation will be child safe screened including that all staff that may potentially interact with international students will be subject to the following:
  - a. working with Children Check status, or similar check;
  - b. proof of personal identity and any professional or other qualifications;
  - c. the person's history of work involving children; and
  - d. references that address the person's suitability for the job and working with children
- vi. All staff will receive training in Ozford's child safe practices and in their reporting obligations.

5.2 For every homestay family that the Homestay agent provides Ozford, the Homestay agent must:

- Check location of host (needs to be close to public transport)
- Visit host families 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 obtain and maintain a current Working with Children Check clearance (WWCC) for all persons over 18 years of age.
- Conduct an interview to ascertain if likely to be suitable host and satisfy child safety requirements. This includes the ability to adequately respond to examples of situations that can arise whilst caring for a student
- Carefully evaluate responses and look for qualities that make good Homestay hosts: understanding, kindness, flexibility and generosity.
- Provide Ozford with a Homestay profile of the family
- Provide an induction into Ozford Child Safe policies and procedures concerning child safety and child-connected work.
- At least annually, provide appropriate guidance and training to the Homestay about:
  - Obligations and responsibilities for managing the risk of child abuse;
  - Child abuse risks in the homestay environment; and
  - Ozford College's current child safety policies and procedures.

5.3 The Homestay Agent must ensure and provide evidence to Ozford that the host family understands that they must provide the following:

- A welcoming household and safe environment – it is expected that the Homestay host will be welcoming and supportive of the visiting student
- 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 and lunch
- Utilities: the provision of all utilities including gas, electricity, and water, excepting outgoing phone calls
- The use of laundry facilities – washing machine, laundry detergent, iron and space for students to dry their clothes
- Their own room furnished with bed, desk, chair, lamp and wardrobe
- Adequate heating/cooling
- A key to the host's premises
- Set up and settle assistance including accompanying the student to their place of study and travelling with them by public transport at least once, assist them in buying MYKI tickets and opening bank accounts.

5.4 Details the Homestay agency are required to provide to Ozford for each homestay host:

- Information about the homestay:
  - Name, date of birth, all contact numbers and occupation for all members of the household
  - No Smoking policy
  - Number of rooms, details of each: bathroom (private/shared), laundry facilities, phone, internet, cable TV, pool, piano, pets (are they allowed inside)

- Students that the host may be currently hosting details – Nationality, age, gender and College they are attending.
- Location – Map reference, Met zone, travel time to school. Distance to train, tram and bus.
- Student preferences – male/female, over 18 only?
- Host interests / activities /
- If host has any holiday plans / past homestay experiences / professional association / clubs / religion etc.
- Suitability for child connected work records including:
  - A current WWCC for every adult residing or frequently visiting the premises which has been verified using the Department of Justice and Regulation check status website (<https://online.justice.vic.gov.au/wwccu/checkstatus.doj>).
  - A current Victorian Police Report
  - Proof of identity for every adult residing or frequently visiting the premises
  - The homestay provider's history/experience of work involving children; and
  - References that address the person's suitability for the job and suitability working with children.

5.5 Ozford will monitor the outsourced homestay supplier to ensure its staff and all homestay providers are suitable for child connected work. The Agreement will be reviewed annually at the end of each calendar year. The quality of the service will be measured on:

- The number of Homestay hosts rejected by Ozford prior to acceptance
- The retention of students in their homestay
- Feedback from the students and their parents
- Any critical issues that arise in respect to the homestay arrangements and the suitability of the supplier's response to these issues.
- Outcomes from homestay provider inspections carried out for each Homestay provider

5.6 Either party may terminate this agreement at any time by giving 30 days' written notice to the other party.

5.7 If the agreement is terminated by either party, existing Homestay arrangements will remain in place for the planned duration providing the Homestay provider and student continue to meet their commitments.

### **Placing Students in Homestay Accommodation**

5.8 Under 18 students who require Homestay are required to complete a Homestay application form to specify their needs and preferences.

5.9 Before placing an under 18 student in homestay, Ozford will obtain a homestay application form from students. Any special needs and preferences are recorded on the form.

5.10 Ozford will liaise with the homestay agency to organise a suitable homestay family that are deemed suitable for the age and needs of the students. If required, the profile may be reviewed by the student and family.

5.11 Alternatively, the family of the student may prefer to use a family friend or relative to act as the homestay provider. Where Ozford has CAAW responsibility for a student, Ozford must approve the arrangement including in the case of these arrangements. The process for screening and monitoring the homestay is the same as for an outsourced arrangement.

5.12 Ozford will conduct independent checks prior to placement and at least every six months (unless the particular homestay has been verified by a site visit in relation to another student in the previous three months) to verify the suitability of the homestay by ensuring approved homestay hosts meet the conditions below:

- Supply individual rooms 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
- Provision of 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 to do their washing and ironing
- 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.
- Ensure all household members over the age of 18 have a current Working with Children Check clearance (WWCC)
- Ensure that the homestay provider has been subject to child safe screening including an interview and checking of references and personal identification. This requirement is also required for family referred arrangements.

5.14 If the homestay is found unsuitable for the student, the homestay agency will provide an alternative homestay profile for review.

5.15 Once confirmed, Ozford will make contact with the homestay family to introduce Ozford to homestay host and to explain some of the relevant policy and rules of Ozford to the homestay host.

5.16 Once a student has moved into a homestay (usually in the first 4 weeks), Ozford will conduct an interview with the student to obtain feedback of the homestay family. Students are informed that they can approach the Student Support 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 student and the accommodation arrangement. Any issues arising must be dealt with promptly to reduce distress or discomfort to all parties.

5.17 The Head of Student Services uses the feedback from students, parents, and any other staff (if required) to ascertain if the homestay is a suitable and appropriate option for student.

5.18 Alternative arrangements will be made if the existing homestay is unable to provide suitable and appropriate care for students.

5.19 Ozford staff will conduct a visit to the homestay every six months after placement to verify that the accommodation is appropriate to the student's age and needs (unless the particular homestay has been verified by a site visit by Ozford in relation to another student in the previous three months).

## **6. Procedures – Student Induction and Safety Information**

6.1 At the time of commencement of the course, the Student Welfare Officer will provide younger overseas students important age and culturally appropriate safety information, including

- What to do and who to contact in an emergency, and
- How to seek assistance and report any incident or allegation of sexual, physical or other abuse.

6.2 Younger students will also be provided with a Student Safety Card which includes:

- (for any student on a CAAW letter in homestay accommodation) the homestay accommodation provider's address, home telephone number and mobile numbers, (Level 2 schools only)
- Ozford's contact details, including 24/7 contact details for Head of Student Support and general emergency contact information
- a statement that "Ozford is regulated by the Victorian Registration and Qualifications Authority (VRQA). Students can contact VRQA at [www.vrqa.vic.gov.au](http://www.vrqa.vic.gov.au)".

### **STUDENT SAFETY CARD**

Residential Address:

Carer/Homestay Contact name & Number:

OFFICE HOUR CONTACT NUMBER of College: +61 (03) 86637188

24/7 CONTACT NUMBER of College: +61 0403062050

EMERGENCY CONTACT NUMBER IN AUSTRALIA: 000

**Notice: Ozford College is regulated by the Victorian Registration and Qualifications Authority. You can contact VRQA at:**

[www.VRQA.vic.gov.au](http://www.VRQA.vic.gov.au)

## **7. Procedures - Monitoring Accommodation and Care Arrangements**

- 7.1 Ozford monitors the suitability of the accommodation and welfare arrangements for students until students turn 18/when the CAWW period ceases using the “Younger Student Welfare Checklist”.
- 7.2 Student Welfare Office will meet with every under 18 student during their first week upon arrival and feedback will be sought from students and parents about the arrangement.
- 7.3 The SWO will also remind students verbally the requirements of approved accommodation. Students will be encouraged to see the SWO directly if they have any concern or issues with the arrangement. Follow up meetings and interviews are also organized by the SWO using the “Younger Student Welfare Checklist” on an ongoing basis or as required
- 7.4 Students are required to notify Ozford 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
- 7.5 Alternative arrangement will be made if existing arrangement is unsuitable and appropriate for students.
- 7.6 The Head of Student Services uses the feedback from students, parents, Student Welfare Officer and any other staff (if required) to ascertain if the homestay is a suitable and appropriate option for student.

## **8. FEEDBACK**

Feedback or comments on this policy and procedure is welcomed by the listed responsible officer.



### Oxford Homestay Assessment Checklist

This form is to be completed when **Oxford staff conduct independent inspection** of Homestays.

Date: \_\_\_\_\_ Staff Member: \_\_\_\_\_

Host Name:		Ph. No:	
Address:			
Occupation:		Days and Hours of Work	
Adult residing #1	WWCC number -		Verified as current? Y/N
Adult residing #2	WWCC number -		Verified as current? Y/N
Adult residing #3	WWCC number -		Verified as current? Y/N
Adult residing #4	WWCC number -		Verified as current? Y/N
Individual Room	Y/N	Comment on House Condition and Living Arrangement	
Bed & bedding	Y/N	Cleanliness, facilities, food provision, meal areas, safety	
Wardrobe	Y/N		
Desk	Y/N		
Laundry facility	Y/N		
Smoke free	Y/N		
Child safe environment (child abuse risk?)	Y/N		
Any children residing here that will turn 18 years of age during next 6 months?	Y/N	If yes, arrange for them to apply for a WWCC and verify that it has been done.	

#### Host Interview/Training:

1. Student arrival and transition support
2. Host responsibilities in student care and addressing student special needs (if any)
3. Provide and explain Child Safe related policy and procedures (Child Safe Risk management, Responding and Responding to allegations of suspected Child Abuse)
4. Obligations and responsibilities for managing the risk of child abuse

#### Comments from Interview/Training:

#### Decision Record:

Homestay arrangement appropriate for student age and needs	Yes/No Comment:
Homestay suitable for Child connected Work	Yes/No Comment:

Sample letter of intention to report for non-approval of welfare and living arrangement

310 King Street Melbourne  
CRICOS No. 02427A  
Registered School No. 2016

Date:

Dear \_\_\_\_\_,

**Intention to Report for Non-Approval of Welfare and Accommodation Arrangement**

During a meeting with you on \_\_\_\_\_ with the Student Welfare Officer, you were informed that your living arrangement is not approved by Ozford.

OR

As you have not provided Ozford with any details about your current accommodation arrangement, we cannot approve of this arrangement and are required to move you into approved living arrangement within the next 5 working days.

A phone call was also made to your parents on \_\_\_\_\_. They have been informed that Ozford requires you to be moved into accommodation approved by Ozford within 5 working days.

According to your student visa condition, you must maintain adequate arrangements for your accommodation, support and general welfare for the duration of your stay in Australia. The visa holder cannot change those arrangements without the written approval of their education provider. Please refer to the relevant website for more details:

<https://immi.homeaffairs.gov.au/visas/already-have-a-visa/check-visa-details-and-conditions/see-your-visa-conditions?product=500>

It is our intention to report you to the Department of Education and Training for non-approval of welfare arrangement if you do not come to see me or the Student Welfare Officer in the next 5 working days to organise a time to move to approved accommodation.

You are encouraged to consult the relevant policies pertaining to this process, all of which are can be easily accessed through the Ozford website. They are listed below:

- Younger Student Policy
- Homestay Policy
- Student Complaints & Appeals Policy

If you have any questions about this process including the assistance available to you, please do not hesitate to contact me.

Yours sincerely,  
Head - Student Services