

## Under 18 International Student Management Procedures

### 1. COMPLIANCE OBLIGATION SUPPORTED

[Education Services for Overseas Students Act 2000 \(Cth\)](#)

### 2. PROCEDURAL DETAILS

This procedure establishes the minimum standards for:

- (a) the admission of international students under 18 years old to the University;
- (b) the selection of welfare and accommodation services providers for this cohort; and
- (c) the safety and wellbeing of this cohort.

#### 2.1. Admission of international students under 18 years of age

2.1.1. The University will only admit international students under 18 years of age for study at its Australian campuses, where they:

- (a) will be at least 16 years of age when they commence their studies; and
- (b) satisfy the University's admission requirements to an award course in accordance with [Statute 12, Admissions and Enrolment Policy, Admissions Procedures](#) and in compliance with the [ESOS National Code Standard 5](#); and
- (c) meet one of the following:
  - i. will be under the care of and live with their parent(s) or legal guardian; or a Suitable Relative nominated by their parent or legal guardian who satisfies the [Department of Home Affairs](#)' (DHA) guardianship requirements; or
  - ii. have University-approved welfare and accommodation arrangements in place.

2.1.2. Global Curtin Admissions will provide the [Welfare and Accommodation Arrangements Form](#) along with the letter of offer to the under 18 international students who intend to study on a student visa.

2.1.3. The Global Curtin Compliance Team will provide all admitted students under 18 years of age with age-appropriate and culturally appropriate information on:

- (a) who to contact in emergency situations, including contact numbers for University staff assigned to their care and/or University appointed service provider staff; and
- (b) how to seek assistance and report any incident or allegation involving actual or alleged sexual, physical, or other abuse.

#### 2.2. Approval of welfare and accommodation arrangements

2.2.1. Parent(s) or legal guardians seeking University approval of welfare and accommodation arrangements for a student will submit a fully completed Welfare and Accommodation Arrangements Form, with their acceptance of offer, to confirm that they:

- (a) have arranged appropriate welfare services and accommodation with University-approved suppliers, listed on the Welfare and Accommodation Arrangements Form; and
- (b) accept the University's Welfare and Accommodation Arrangements Terms and Conditions see Section 3 of the Welfare and Accommodation Arrangements Form.

2.2.2. The Global Curtin Admissions Advisor will consider the Welfare and Accommodation Arrangements Form and may issue a Confirmation of Appropriate Accommodation and Welfare (CAAW), which will include the approved Welfare Period dates; and details of the welfare and accommodation arrangements that have been made for the student.

- 2.2.3. Students under University-approved arrangements must continue to abide with the Welfare and Accommodation Arrangement Terms and Conditions for the entire duration of the approved welfare period. Failure to abide by these terms and conditions may result in a student having their enrolment suspended or being excluded from the University and reported to the DHA.
- 2.2.4. The validity of a CAAW certificate issued by the University ceases if:
- the student transfers to another education provider and that provider assumes responsibility for approving the student's welfare, support and accommodation arrangements;
  - the student leaves Australia; or
  - other suitable arrangements are made for the student's welfare and accommodation, that satisfy the Australian [Migration Regulations 1994 \(Cth\)](#), (such as residing with a parent).
- In these instances, Global Curtin Admissions or the Fees and Statutory Reporting teams will notify the DHA of these changes through [Provider Registration and International Student Management System \(PRISMS\)](#) reporting and cancel the CAAW as soon as practicable.
- 2.2.5. Global Curtin Compliance will continue to monitor the suitability of welfare, support and accommodation arrangements for students whose enrolment has been terminated, suspended or cancelled, as per [ESOS National Code Standard 5.6](#), until:
- the student has alternative welfare arrangement approved by another registered provider;
  - the student leaves Australia;
  - other suitable arrangements are made that satisfy the Australian [Migration Regulations 1994 \(Cth\)](#), (such as residing with a parent); or
  - the University notifies the DHA that it is no longer able to approve the student's welfare arrangements or that it has taken the required action after not being able to contact the student.
- 2.2.6. Student breaches of the Welfare and Accommodation Arrangement Terms and Conditions, (e.g., breaching curfew requirements), will result in Global Curtin Compliance sending a warning notice to the student and their parent/legal guardian. Continued breaches may result in the student's enrolment being terminated. The student may be asked to return home or to re-enrol after they turn 18 years of age.
- 2.2.7. The University will not accept or transfer any payments between parents or legal guardians and approved service providers.

### **2.3. The transfer of international students under 18 years of age**

#### **2.3.1. All Transfers**

The Global Curtin Admissions and Compliance teams will advise inbound and outbound transfer students to maintain their existing current welfare arrangements until the transfer date, or have alternate welfare arrangements approved, or return to their home country until the new approved welfare arrangements take effect.

#### **2.3.2. Inbound Transfers**

In addition to meeting the admission requirements laid out in section 2.1.1(a) and (b), students intending to transfer to Curtin University from another [Australian Registered Provider](#) will not be admitted until, Global Curtin Admissions has negotiated and agreed the transfer date for welfare arrangements with the releasing registered provider to ensure there is no gap in cover.

#### **2.3.3. Outbound Transfers**

Students seeking to transfer from Curtin University to another Australian registered provider will apply using the Student Withdrawal or Student Transfer Request Processes. The Global Curtin Compliance or the Student Fees and Statutory Reporting Teams will only approve the transfer of a student where:

- (a) the student's circumstances and application satisfy the University's requirements for withdrawal or transfer;
- (b) written support for the transfer is provided by the student's parent or legal guardian; and
- (c) they have negotiated and agreed the transfer date for welfare arrangements with the accepting registered provider to ensure there is no gap in cover.

#### **2.4. Selection of Accommodation and Welfare Services Providers**

2.4.1. The Manager, International Compliance (Global Curtin) will:

- (a) vet and recommend companies for appointment by the Director, Global Curtin to deliver Accommodation and Welfare Services for international students under 18 years of age;
- (b) agree and monitor compliance with Service Level Agreements by contracted service providers; and
- (c) recommend to the Director, Global Curtin to terminate agreements with service providers who fail to maintain compliance with Service Level Agreements.

#### **2.4.2. Service Level Agreements for Accommodation Services Providers**

Service Level Agreements established with Accommodation Services Providers will detail:

- (a) accommodation standards, including the requirements that:
  - i. students under the age of 18 have their own bedroom;
  - ii. no mixed-gender rules apply (i.e., female and male students cannot be hosted together if one of the students is under the age of 18);
  - iii. care be taken to ensure the gap in age between the under 18 student and other students in the home is no greater than 3 years; and
  - iv. The maximum number of students that can be accommodated, including those placed by another homestay agency and/or student in a separate twin share room, is limited to 3;
- (b) processes to ensure any adult (person 18 years or older) residing at the homestay has a valid Working with Children Check. This includes any temporary visitors, people who live at the premises part-time, as well as full-time residents;
- (c) that the service provider will maintain records of all contact with parents and legal guardians accessible by the University for audit purposes;
- (d) critical incident procedures that require the University to be notified of any critical incident involving its student within 60 minutes of the incident being identified and that the Manager, International Compliance (Global Curtin) will review the critical incident procedures every 12 months;
- (e) processes to ensure host families receive appropriate training; that accommodation is physically inspected at least every 12 months and that regular ongoing checks on accommodation standards are made by contacting the host family by phone or email at least every 3 months;
- (f) accommodation profiles provided to parents and students will:
  - i. show the date of the most recent inspection; and
  - ii. specify that the accommodation is age appropriate for an under 18 student; and
- (g) requirements for monitoring accommodation standards through regular reports to be sent to Global Curtin Compliance, and regular meetings to take place between the University and a Homestay Provider to discuss the arrangements.

#### **2.4.3. Service Level Agreements for Welfare Services Providers**

Service Level Agreements established with Welfare Services Providers will detail the following requirements:

- (a) any staff assigned to manage students (caregivers) will have valid Working with Children Check;
- (b) the nominated caregiver will conduct an initial visit with the student under care in their accommodation within 48 hours of their arrival. Where this is not possible (e.g., due to unavailability of the host), the caregiver will notify Global Curtin Compliance;
- (c) nominated caregivers will conduct fortnightly visits and phone calls with students under care independent of the University. Where necessary Global Curtin Compliance will provide suitable locations on campus for caregivers to conduct their fortnightly visits with students;
- (d) that the service provider will provide parents and legal guardians with periodic updates (e.g., a bi-monthly cycle) on their child's wellbeing and academic progress;
- (e) the service provider will maintain records of all contact with parents and legal guardians accessible by the University for audit purposes; and
- (f) critical incident procedures that require the University to be notified of any critical incident involving its student within 60 minutes of the incident being identified and that the Manager, International Compliance (Global Curtin) will review the critical incident procedures every 12 months.

## 2.5. Critical Incident Management and Notifications

- 2.5.1. The University will meet the relevant legislative and regulatory requirements relating to child welfare and protection of enrolled students under 18 years of age and will adhere to its policies and procedures, with particular consideration of the [Health and Safety Policy](#) and [Risk Management Policy](#).
- 2.5.2. In the event of an incident the Manager, International Compliance (Global Curtin) may notify the following stakeholders of any incidents involving international students under 18 years of age:
  - (a) The student's nominated welfare services provider, as proxy for the student's parents or legal guardian; or
  - (b) The DHA-approved relative, nominated as the student's guardian; and
  - (c) The Departments of Education and Home Affairs as per the PRISMS reporting requirements.
- 2.5.3. The Director, Global Curtin will appoint a Global Curtin team member to act as the designated Incident Manager to oversee wellbeing and safety of the student, including an assessment of whether the incident has resulted in the student's welfare and/or accommodation arrangements no longer being appropriate. Where this is the case, the Incident Manager will liaise with Global Curtin and the nominated service providers to put alternative arrangements in place as soon as practicable.
- 2.5.4. Where the University has concerns for the student's welfare, and is unable to contact the student under care, every reasonable effort will be taken to locate the student, including notifying, and assisting:
  - (a) The student's nominated welfare services provider, as proxy for the student's parents or legal guardian; or
  - (b) The DHA-approved relative, nominated as the student's guardian; and
  - (c) the police and any other relevant Commonwealth, State or Territory agency as soon as practicable.

## 2.6. Recordkeeping

- 2.6.1. The Global Curtin Compliance team will maintain up-to-date contact details for all admitted students including those details listed in [National Code Standard 3.5](#) and the contact details of:
  - (a) the student's parent(s), legal guardian; and/or

- (b) any adults assigned responsibility for the student's welfare or accommodation (e.g., a Student Welfare Advocate) or homestay parent.
- 2.6.2. Any personal information collected will be handled in accordance with the [Privacy Statement](#) and the [Disclosure of Personal Information Procedures](#).
- 2.6.3. All records relating to a critical incident response will be generated, stored and maintained as required in accordance with the [Information Management Policy and Procedures](#).

### 3. RESPONSIBILITIES

Responsibilities are as set out in Section 2.

### 4. SCOPE OF PROCEDURES

These procedures apply to staff involved in;

4.1 the admission of international students intending to study in any location or campus within Australia who are:

- (a) holding a Student Visa (Subclass 500); and are
- (b) under 18 years of age when they commence their studies; and

4.2 the selection of welfare and accommodation service providers in Australia.

### 5. DEFINITIONS

(Note: Commonly defined terms are located in the [Curtin Common Definitions](#). Any defined terms below are specific to this document)

#### **Approved Accommodation Provider**

An accommodation provider with which the University has an agreement in respect of the accommodation of Under 18 Students.

#### **Australian Registered Provider**

An education institution registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) for the delivery of education services to student visa holders.

#### **Caregiver**

An employee of a Curtin University approved Welfare Service Provider assigned responsibility for the student under care.

#### **Confirmation of Appropriate Accommodation and Welfare (CAAW)**

The Confirmation of Appropriate Accommodation and Welfare a pro-forma letter downloadable through PRISMS which specifies the agreed welfare period dates and details of the care arrangements put in place for the students.

#### **Guardian or Suitable Relative**

A person aged over 21 who is a spouse, de facto partner, a child, brother or sister of the Applicant, step-child, step-parent, step-brother or step-sister of the Applicant, grandparent, grandchild, aunt, uncle, niece or nephew, or a step-grandparent, step-grandchild, step-aunt, step-uncle, step-niece or step-nephew of the Applicant.

#### **Provider Registration and International Student Management System (PRISMS)**

An online database maintained by the Department of Education used to issue Confirmations of Enrolment (CoE), required for student visa applications and report changes to student enrolments.

#### **Under 18 Student**

An international student studying on a student visa who is under the age of 18 when they commence their University course.

#### **Welfare Period**

The period for which the University accepts responsibility for approving welfare, support and accommodation arrangements and as advised to the Department of Home Affairs (DHA) in accordance with the *National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code)*.

## Welfare Service Provider

A Curtin University approved business or company providing welfare and pastoral care services for international Under 18 Students.

### 6. SCHEDULES

Nil.

### 7. RELATED DOCUMENTS/LINKS/FORMS

#### Internal

- [Admission and Enrolment Policy \(\\*see Admission and Enrolment Manual\)](#)
- [Admission Procedure \(\\*see Admission and Enrolment Manual\)](#)
- [Disclosure of Personal Information Procedures](#)
- [Health and Safety Policy](#)
- [Incident Alert matrix](#)
- [Information Management Policy](#)
- [Information Management Procedures](#)
- [Privacy Statement](#)
- [Risk Management Policy](#)
- [Sexual Assault and Sexual Harassment Prevention Policy](#)
- [Statute 12](#)
- [Welfare and Accommodation Arrangements Form](#)
- [Working with Children Check Procedures](#)

#### External

- [National Code of Practice for Providers of Education and Training to Overseas 2018 \(National Code\)](#)
- [Department of Home Affairs – Welfare arrangements for students under 18](#)
- [Migration Regulation 1994 \(Cth\)](#)

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#### REVISION HISTORY (filled out by Compliance Services)

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