



Global Business College of Australia Pty Ltd

trading as

Global Business College of Australia (GBCA)

**POLICY 28 WELFARE ARRANGEMENTS FOR UNDER 18 YEAR OF AGE  
INTERNATIONAL STUDENTS**

**337-339 La Trobe Street, Melbourne VIC 3000**

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## DOCUMENT CONTROL

<b>Department</b>	Management	<b>Author(s)</b>	Gbca	
<b>Quality Controlled Policy No. &amp; Title</b>	Policy 28 Welfare Arrangements For Under 18 Year Of Age International Students V1.2	<b>Approved</b>	Compliance Manager	
		<b>Authorised</b>	Managing Director	
<b>Standards</b>	ESOS National Code 2018 - Standard 5 ELICOS standard	<b>Distribution</b>	Internal	All staff
			External	GBCA website

## REVISION RECORD

<b>Date</b>	<b>Version</b>	<b>Revision description</b>
6 Feb 2017	1.0	Original version
15 Sep 2017	1.1	Update titles, address on cover
27 Feb 2018	1.2	Update policy to reflect the National Code 2018

## 1.0 Purpose

- 1.1 Australian Government regulations (ESOS National Code – Standard 5) and Student Visa conditions require that any student under the age of 18 must have approved accommodation and welfare arrangements in place.
- 1.2 Students under 18 years of age applying for a student visa will need to provide confirmation of the arrangements that they have in place to assure appropriate accommodation and welfare arrangements for themselves. These arrangements must meet the requirements of the Australian Government Department of Home and Affairs (DoHA) and this includes either:
  - a. Living with a parent of legal custodian; or
  - b. Living with a relative over 21 years of age who is nominated by a parent or legal guardian; or
  - c. Living under a welfare arrangement that has been approved by an Australian education provider.
- 1.3 The purpose of this policy and procedure is to set out the intent and provisions of the Global Business College of Australia (GBCA) in order to comply with the ESOS National Code Standard 5:

## 2.0 Scope

This policy and procedure apply to all international students who are under 18 years of age enrolled at GBCA.

## 3.0 Responsibility

- 3.1 The Compliance Manager is responsible for administering this policy and procedure.
- 3.2 The Student Administration Officer is responsible for the implementation of this procedure.

## 4.0 Definitions

- 4.1 Confirmation of Appropriate Accommodation and Welfare Arrangement (CAAW) letter: a pre-forma letter generated on the Provider Registration and International Student Management System (PRISM).
- 4.2 Confirmation of Enrolment (CoE): a CoE is a document that confirms student's enrolment as an international student at GBCA. It also shows the start and end date of the enrolled course.

## 5.0 Requirements

- 5.1 GBCA requires international students who are under 18 years of age to demonstrate that they will:
  - Live with a parent of legal custodian; or
  - Live with a relative over 21 years of age who is nominated by a parent or legal guardian; or
  - Live under a welfare arrangement that has been approved by an GBCA.

Until such time that they turn 18 years of age.

- 5.2 DOHA requires a relative to be aged over 21 years of age, be of good character and be eligible to remain in Australia until the applicant's visa expires or they turn 18. A relative is defined by DOHA as parent, 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. (Definition extracted from [form 157N](#), DoHA website Feb 27, 2018)
- 5.3 Under the terms of the National Code Part D Standard 5, GBCA is required to:
  - a) Nominate the dates for which responsibility is accepted for approving the student's accommodation, support and general welfare arrangements;
  - b) Advise DoHA in writing of the approval using the specified PRISMS pro forma letter;

- c) Have documented procedures for checking the suitability of the student's accommodation, support and general welfare arrangements;
- d) Advise DOHA of any change in these living arrangements; and e) continue welfare responsibility where a student's enrolment is terminated, suspended, or cancelled, until:
- the student is accepted by another registered provider who takes responsibility for the accommodation, support and student welfare;
  - the student leaves Australia;
  - the provider appropriately reports it can no longer approve arrangements for the student; or
  - alternative arrangements are made in accordance with Australian Migration Regulations.
- 5.4 GBCA nominates the start and end dates of welfare responsibility by completing and signing the Confirmation of Appropriate Accommodation/Welfare Arrangements (CAAW) letter generated from PRISMS. The student visa start and end dates will correspond with the dates in this letter, except if the student turns 18 during studies, when the standard visa end date will apply. The student cannot arrive in Australia before the nominated start date of the CAAW.
- 5.5 GBCA must give age and culturally appropriate information to international students under the age of 18, on:
- Who to contact in emergency situations, including contact numbers of GBCA Welfare Support Officer and welfare service provider (if applicable); and
  - How to seek assistance and report any incidents involving sexual, physical or other abuse.
- 5.6 GBCA engages a welfare provider and a homestay accommodation provider to assist in arranging suitable homestay accommodation and the oversight and provision of the welfare and support of international students under 18 years of age who are not living with a parent/legal guardian or approved relative. Responsibility for the student's welfare remains with GBCA.
- 5.6.1. Selecting welfare and accommodation arrangement providers
- GBCA selects welfare provider for its students based on the following requirements:
- The nominated guardian must have a valid Work with children check (WWCC)
  - Provide 24/7 telephone assistance for students
  - Conduct independent visit to students' accommodation at least once per 6 months.
  - Allow 24/7 for GBCA staff to access to students' guardian.
  - Provide local orientation for students during the first week of student arrival in Australia
  - Maintain bi-weekly contact with a student and provide access to GBCA welfare officer to the communication log.
  - Send a report to parents within 30 days of first arrival of student with the following details: local bank details of student, local mobile number of student, general information of how the student is settled in, full name and contact details of guardian, 24/7 emergency contact number for parents to call if emergency assistance is required.
  - Have a Grievance/complaints process in place to solve any arising disputes.
  - Have a non-English native speaking staff is preferable.
- GBCA selects homestay accommodation provider for its students based on the following requirements:
- Ensure that all adults providing accommodation must have a valid WWCC
  - Have a proven track record of providing homestay services for international students.
  - Provide homestay hosts with necessary training to ensure that they are familiar with students coming from different cultural.
  - Have a system in place to ensure student and host family is "best match"
  - Follow up any complaint made by students/host as soon as possible

#### 5.6.2. Monitoring welfare and accommodation arrangement providers

- GBCA welfare officer will conduct an initial visit to a homestay accommodation prior to the accommodation being approved and every six months thereafter.
- GBCA staff will contact its student at least once every two weeks.
- Feedback from GBCA visit and from student will be discussed with the relevant provider.
- Any issue raised during the monitoring period will be discussed with the relevant provider within seven (7) days of the identification of issue/s.
- The service provider is required to rectify the issue and report to GBCA within 10 working days after the discussion took place.
- GBCA may review the agreement with a third-party provider if the issue is not satisfactory resolved. Responsibility for the student's welfare remains with GBCA.

5.7 GBCA will accept responsibility for the accommodation, support and welfare of international students under 18 years of age commencing their programs under the following welfare provisions:

- the student is at least 17 years of age;
- the student's parent/legal custodian has agreed in writing to the GBCA accepting responsibility for their son or daughter's welfare by completing and signing the GBCA Under 18 Student Agreement;
- the student's parent/legal custodian has agreed in writing to the approved welfare provider providing ongoing welfare support to the student until their son or daughter turns 18 years of age;
- the student must live in the GBCA approved homestay accommodation until the end of their welfare dates and not change that accommodation unless written agreement is obtained from the parent/legal guardian and GBCA;
- the student must be met upon first arrival at the Melbourne Tullamarine International airport by a GBCA approved representative or the GBCA approved homestay provider;
- the student must attend orientation, and meet with a GBCA Student Support Officer in the first week after their arrival in Australia;
- students who expect to arrive late must send to GBCA the completed SA043 Student deferral, Suspension cancellation application form and obtain permission from the Student Administration & Services Manager. On arrival, the student must make contact with the GBCA Student Support Officer.
- the student must meet with a GBCA Student Support Officer to discuss academic progress every two weeks and at the end of each study term, or upon turning 18, whichever comes first.
- the student will not stay overnight from the approved homestay address without written approval from the student's parent or legal custodian and the representative from GBCA.

5.8 For transfer students, GBCA will accept responsibility for the accommodation, support and welfare of international students under 18 years of age commencing their programs under the following welfare provisions:

- the student's parent/legal custodian has agreed in writing to the GBCA accepting responsibility for their son or daughter's welfare by completing and signing the GBCA Under 18 Student Agreement;
- the student's parent/legal custodian has agreed in writing to the approved welfare provider providing ongoing welfare support to the student until their son or daughter turns 18 years of age; or the student's parent /legal custodian has agreed in writing to nominate a person who to care for an/or to provide accommodation for the student until their son or daughter turns 18 years of age;
  - GBCA will ensure the nominated person must be at least 21 years old, and of good character, and has an appropriate visa to remain in Australia until the student turn 18 years of age.

- the student must live in the GBCA approved homestay accommodation until the end of their welfare dates and not change that accommodation unless written agreement is obtained from the parent/legal guardian and GBCA;
- the student must attend orientation, and meet with a GBCA Student Support Officer in the first week of their study.
- the student must meet with a GBCA Student Support Officer to discuss academic progress every two weeks and at the end of each study term, or upon turning 18, whichever comes first. During the meeting, the Support Officer will confirm with the student that the accommodation still meets the student's needs.
- the student will not stay overnight from the approved homestay address without written approval from the student's parent or legal custodian and the representative from GBCA.

## 6.0 **Method**

### 6.1 Identification of students under 18 years of age:

- 6.1.1. An applicant is identified as under 18 years of age during the admissions process.
- 6.1.2. An offer of admission will be conditional upon submission of a completed and signed GBCA International Student Under 18 Agreement signed by the student and their parent(s)/legal guardian(s).
- 6.1.3. If the student will be cared for by a relative, as defined by DoHA, GBCA will require satisfactory evidence of the relationship (e.g. birth and/or marriage certificate).
- 6.1.4. If the applicant and their parent/legal guardian request GBCA to provide accommodation, support and welfare arrangements, GBCA will provide the student details to the welfare and accommodation providers. GBCA requires students under 18 years of age to make arrangement for the welfare service and homestay accommodation service until the student turns 18 years of age, or finishes their program, whichever is the earliest.
- 6.1.5. If the applicant and their parent/legal guardian arrange their own homestay and guardianship, GBCA will require evidence of homestay accommodation and guardianship arrangement. The guardian must be at least 21 years old, and of good character, and has an appropriate visa to remain in Australia until the student turn 18 years of age. GBCA will visit the accommodation and contact the guardian to ensure such arrangements are in place.
- 6.1.6. If the student is transferred from another provider, GBCA will ensure that there is no gap in welfare arrangements. GBCA will liaise with the first provider to ensure the overseas students has appropriate welfare arrangement in place at all time and issue a CAAW letter covering the transition from one accommodation arrangement to another.
- 6.1.7. GBCA will ensure that prior to the accommodation being approved, GBCA Welfare Support Officer will conduct a physical site visit to ensure that the student's accommodation is appropriate to the overseas student's age and needs. An approved accommodation facilities include but not limited to:
  - A safe, secure, private bedroom for the student's sole use with suitable storage space for clothes, personal effects and study materials, and suitable facilities including a desk, a chair and adequate lighting for study purposes;
  - The home is clean and has appropriate furnishings suitable for a family and students;
  - There is access to a shared or private bathroom, with reasonable time allowed for showers;
  - There is access to kitchen, living areas, laundry facilities and shared areas of the home;
  - There is some form of heating in winter if required and some means of cooling in summer;
  - Students are to be provided with any keys, alarms or passwords required to have free access to the homestay residence.

6.1.8. Once the admission officer has received the confirmation from the welfare provider and homestay provider that either the student has registered for both services, or the accommodation arrangement is in place and the student welfare is taken care of by a person that satisfies the requirement in clause 6.1.5, the GBCA Student Administration Officer will issue the CoE and CAAW. The nominated start date on the CAAW will be 3 days prior to the course orientation date and the end date will be the date the student turns 18, or the end date of the CoE plus seven days. The GBCA Student Administration Officer will send the details of the student to the Welfare Support Officer.

## 6.2 Pre-arrival:

6.2.1. The GBCA Welfare Support Officer will send an introductory letter to the student and liaise with the airport pick up service provider, the welfare arrangement provider and/or the homestay accommodation provider to coordinate the arrival of the student.

6.2.2. The GBCA Welfare Support Officer will regularly liaise with the welfare provider and/or homestay accommodation providers to confirm the pending arrival of any international students under 18 years of age and to check and update the details of those students.

## 6.3 Arrival and orientation

6.3.1. The student must attend orientation, and meet with a GBCA Student Support Officer in the first week after their arrival in Australia;

6.3.2. At the first meeting with the student, the GBCA Student Support Officer and/or the Welfare Support Officer will:

- Update the student's contact and address
- Go through the orientation content with the student
- Check that the student is comfortable with the current welfare and accommodation arrangements (and follow up with the welfare provider if any problems are found)
- Remind the student to save the GBCA 24/7 mobile number.

6.3.3. If the Welfare Support Officer has received confirmation of a student's arrival in Australia but has not been contacted by the student or if the student misses their initial meeting, the Welfare Support Officer will implement one or more of the following:

- Contact the welfare provider and homestay provider to establish the last student contact.
- Contact the homestay host
- Contact the student
- Report to the Student Administration & Services Manager
- Report to local police
- Follow the Critical Incident Policy and Procedure (as required)

## 6.4 Monitoring of students during studies

6.4.1. GBCA Welfare Support Officer will regularly check with the welfare provider to ensure that is maintaining regular contact with student.

6.4.2. GBCA Welfare Support Officer will conduct a physical site visit to the student's accommodation at least every six months to confirm that the accommodation still meets the student's needs.

6.4.3. Where it is identified by the Welfare Support Officer that a student is missing meetings with the service and/or the welfare provider, the Welfare Support Officer will contact the student to follow up and discuss any problems that the student may face.

- 6.4.4. Where it is found that the welfare provider is not maintaining the required contact with the student, the Student Administration & Services Manager will report this in writing to the welfare provider's director for investigation and action where required.
- 6.4.5. When an international student under the age of 18 is found to be "at-risk" of breaching his or her student visa conditions, The Student Administration & Services Manager will arrange a counselling meeting with the student. The Student Administration & Services Manager may implement an intervention strategy, depending on the nature of the risk.
- 6.4.6. Where a student continues to breach conditions of their student visa or the accommodation, support, and general welfare arrangements of GBCA, the case will be referred to the Compliance Manager for consideration of cancellation of the CAAW.
- 6.4.7. International students under the age of 18 must stay in homestay accommodation approved by GBCA.
- 6.4.8. Students may not at any time or for any period stay anywhere other than the agreed accommodation except with the prior written approval of GBCA and the parent/legal guardian.
- 6.4.9. Students seeking a permanent accommodation change must first discuss with the GBCA Welfare Support Officer, who will in turn liaise with the Welfare Support provider and/or the homestay accommodation provider. If the change is approved and facilitated, the Student Administration & Services Manager will be informed by the GBCA Welfare Support Officer of the change of accommodation and will advise DoHA of the approved change to arrangements. This is done through the 'Approval to Change Accommodation/Welfare Arrangements' letter. Similarly, where the accommodation change is not approved, but the student refuses to maintain care arrangements which the provider has approved, Student Administration & Services Manager will advise DOHA of non-approval of the arrangements through the 'Non-Approval of Appropriate Accommodation/Welfare Arrangements' letter.
- 6.4.10. Where a student is reported to have stayed at accommodation not approved by GBCA, GBCA may report the student for breach of their welfare arrangements. In particular, if the student has moved permanently to alternative accommodation without GBCA's approval, Standard 5.1.d of the National Code Part D requires that GBCA advises DOHA immediately.
- 6.4.11. Critical incidents and possible critical incidents involving international students under the age of 18 are to be dealt with under the GBCA Critical Incident policy procedures (Policy 9).
- 6.5 Transferring to another provider
- All applications for transfer to another provider by international students will be considered under GBCA Student Transfer Policy and Procedure (Policy 18). In addition to the requirements of the policy 18, GBCA Student Administration Officer must verify that the student has welfare arrangements in place with the new provider and the new welfare provider to provide a letter of support from the student's parent/legal guardian.
- 6.6 Termination of CAAW and/or Enrolment
- 6.6.1. Where GBCA finds that a student has breached the CAAW, the GBCA Student Administration & Services Manager may cancel the CAAW and inform DOHA (through PRISMS). Students will be informed of the cancellation of the CAAW in writing by the Student Management team. Accordingly, unless the student can arrange alternative living arrangements that are acceptable to GBCA (i.e. student will live with a parent or legal custodian or with a relative aged over 21 nominated by the parent or legal



guardian) GBCA will be required to cancel or suspend the student's enrolment. In such cases, the student (if eligible) may reapply for admission when he or she turns 18.

6.6.2. Where an enrolment is terminated, suspended or cancelled, GBCA will continue to be responsible for the student's welfare arrangements until:

- 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
- GBCA has notified the Department of Home Affairs through PRISMS that it is no longer able to approve the overseas student's welfare arrangements; or
- If GBCA is unable to contact a student and has concerns for the student's welfare, GBCA has made all reasonable efforts to locate the student, including notifying the police and any other relevant Commonwealth, state or territory agencies as soon as practicable, or
- the overseas student turns 18.

Form SA051 GBCA International Student Under 18 Agreement

Form SA052 GBCA Welcome letter to international students under 18

Form SA061 GBCA site visit checklist – accommodation for international student under 18